

1. Response Report 1 – Regulation 18 Questionnaire Responses

- 1.1. This Response Report summarises what people who completed the Regulation 18 questionnaire (either online or via email) told us as part of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan Regulation 18 consultation.
- 1.2. The consultation was held between January 15th – March 13th 2024.

2. What did we ask?

- 2.1. There were 31 questions on the questionnaire across different topic areas. The full questionnaire is set out below with hyperlinks to the summaries:

Strategic and Local Plan

- [1. The SPL covers a minimum of 15 years, how far into the future should the Strategic and Local Plan cover?](#)
- [2. Are there any strategic policy topics, not identified above \(paragraph 2.4\), which should also be considered?](#)
- [3. What local policy topics are unique to only a council area, neighbourhood or community?](#)

Draft Vision and Strategic Objectives

- [4. Do you agree with the draft Vision?](#)
 - [a. If not, what changes would you like to see?](#)
- [5. Do you agree with the draft Strategic Objectives?](#)
 - [a. If not, what changes would you like to see?](#)

Planning for climate change and nature recovery

- [6. In what ways do you consider the Strategic and Local Plan can most effectively address the impacts of climate change?](#)

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7. What measures and standards should the Strategic and Local Plan introduce in respect of the:

a. Construction and operation of new buildings?

b. Retention and reuse of existing buildings?

8. Should the Strategic and Local Plan require more than the mandatory minimum 10% Biodiversity Net Gain through development?

9. Are you aware of any land that could be identified for environmental purposes, such as wildlife/biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production?

10. Which key services and facilities do you think are most important to be provided within easy reach of developments?

11. Should we allocate sites in the SLP specifically for renewable energy generation or storage?

a. If so, what forms of renewable energy would be appropriate and in which locations?

Planning for new homes and businesses

New Homes

12. Should the Strategic and Local Plan use the local annual housing need calculation from the Standard Method?

a. If no, please set out what you consider the councils should use instead.

13. Are there any constraints or other reasons why the number of houses to be actually planned for in the Strategic and Local Plan should differ from calculated needs?

14. Are there any specific types, sizes or tenures of housing that the SLP should require for particular groups in the community?

a. If so, please explain further.

Traveller Communities

15. Should sites for traveller communities be provided as part of large developments for housing and/or employment?

16. Are there any other ways that sites for traveller communities could be met in our area?

17. What site characteristics and locations would be most suitable for different traveller communities?

Jobs and the economy

18. What economic and regeneration needs should the Strategic and Local Plan address in supporting businesses to invest, expand and adapt?

19. How should the Strategic and Local Plan best seek to accommodate employment needs and provide an environment that is attractive to inward investment?

20. How should the Strategic and Local Plan support and encourage rural employment?

Retail and town centres

21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?

22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?

Infrastructure

23. What types of infrastructure do you consider are most critical to be delivered alongside new development?

24. Given their size, if strategic scale new settlements were to form a part of the Strategic and Local Plan, what accompanying infrastructure would be necessary?

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25. What key services and facilities do you consider most important in deciding if a rural settlement is a suitable location for new homes and other forms of development?

26. Should the Strategic and Local Plan safeguard sites or routes for longer term infrastructure projects?

Planning for sustainable development

27. Are there any additional development scenarios that should be considered?

a. If yes, please describe what they are.

28. Are the pros and cons identified for the six development scenarios a fair and accurate assessment?

a. If not, which one(s) and what are your reasons?

29. Which of the development scenarios, or combination of them, do you consider the most appropriate for the Strategic and Local Plan?

30. Are there any places not currently identified in the rural settlement hierarchy, which could/should be included?

Conclusions and Next Steps

31. Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

3. How were the questions presented?

- 3.1. Respondents could complete the questionnaire through the online consultation software [Citizen Lab](#) (now Go-Vocal). Respondents could also download the questionnaire and email it back to the SLP team.
- 3.2. 242 emails were received (229 during the consultation period and 13 late submissions that were considered). 108 questionnaires were completed directly online through the consultation software.

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- 3.3. Some questions were also asked through individual 'projects' on the consultation portal. This enabled people who were only interested in a particular topic (such as climate and nature or housing for example) to go into that project and interact without needing to complete the full questionnaire or read the document in full. Appendix 1 provides screenshots of 'project' windows taken from the consultation software.
- 3.4. The questionnaire was also adapted for young people (aged 13-25) and the results of this are presented in the separate response report 2 - Young People.

4. What did you tell us?

- 4.1. Comments from all sources were uploaded and combined using the consultation software to provide 'AI Insights'. These are a summary of what everyone said using artificial intelligence software. Those summaries were then cross checked by officers against the individual responses and amended as appropriate.
- 4.2. Below is a summary of all responses from all sources made to the questionnaire.

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1. The SPL covers a minimum of 15 years, how far into the future should the Strategic and Local Plan cover?

Of the respondents who provided a whole numerical answer (119) the range of answers was 1 year to 100 years with an average of 20.3 years.

Those that provided more detailed answers commented on the requirements of the NPPF and Planning Practice Guidance in suggesting the plan should cover at least 15 years post adoption with a vision looking 30 years ahead. Others suggested aligning the plan period with the National Highway Road period. A suggestion was also made to extend the plan period to align with the Tewkesbury Garden Communities Project (up to around 2050).

2. Are there any strategic policy topics, not identified above (paragraph 2.4), which should also be considered?

Respondents raised several points regarding strategic policy topics that they felt should be considered. This included the need for a focus on crime prevention and designing out crime, as well as the importance of preserving the character and amenity of existing settlements. There were suggestions for more emphasis on green infrastructure, including the preservation of green spaces and preventing the merging of villages into larger towns, the delivery of biodiversity net gain and net zero carbon development.

It was highlighted that there needs to be better systems to review and update plans, and concerns were raised about the impact of development on healthcare infrastructure, with calls for more proactive planning in this area. The importance of considering secondary healthcare, such as hospitals, was also mentioned.

The use of brownfield sites before greenfield sites for development was emphasised, and there were calls for policies to consider the end state /saturation point of areas, beyond which no more houses should be built. Traffic calming measures were also mentioned as a topic to be considered. It was further reiterated that the Plan will need to be supported by a Green Belt review and the consideration of Green Belt releases of land for housing.

Some respondents expressed objections to specific development ideas, such as a Cheltenham/Gloucester/Tewkesbury megacity, while others emphasised the need for active travel infrastructure and expanding access to the railway network.

There were also suggestions to include policies on power generation and distribution, district heating/cooling and carbon emissions. The need for future-proofing housing and ensuring services are adaptable was also highlighted. It was also suggested that criterion d) (conservation and enhancement of the natural, built and historic environment) could be amended to address the climate change emergency declared across the joint authority areas.

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It was also highlighted that consideration should be given to any cross boundary strategic issues in terms of housing and / or employment delivery and the need for associated infrastructure.

It was suggested that a strategic topic area should include analysis of long-term requirements and opportunities arising from related economic strategies and major infrastructure investment opportunities. It was further suggested that the view of the Local Enterprise Partnership (GFirstLEP) should specifically be incorporated.

Overall, respondents wish to see strategic policies that are comprehensive, forward-thinking and considerate of the existing character of communities, infrastructure needs, environmental and economical sustainability and public well-being.

3. What local policy topics are unique to only a council area, neighbourhood or community?

Respondents raised concerns about a variety of local policy topics, with a significant emphasis on the impact of new housing developments on infrastructure, traffic and the environment.

Many respondents were concerned about the loss of Green Belt areas and farmland, and the effect on local wildlife and biodiversity. Traffic congestion and inadequate road infrastructure were also major concerns, particularly in relation to specific areas (such as the B4215 through Highnam) and the impact of developments on the A40 and surrounding routes. The M5, Junction 10 improvements were also highlighted as important considerations for the west of Cheltenham.

Flooding was a recurring theme of concern, with several respondents mentioning the need for better flood risk management and protection. The preservation of heritage environments and specific local landmarks, such as Cheltenham Racecourse and Staverton Airport were also highlighted. In addition, the Golden Valley was specifically mentioned as a significant designation for growth at northwest Cheltenham.

Several respondents expressed the need for more localised knowledge in planning, particularly regarding infrastructure issues. It was suggested to integrate urban extension areas with existing settlements. The importance

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of protecting natural landscapes and maintaining recreational opportunities was also mentioned, as well as the need for standards for community open space and meeting places.

It was suggested that it is important that the specific circumstances of Local Authority areas and specific settlements/communities are given due consideration (for example local housing need, affordability, demographic challenges) within the SLP.

There was a call for the strategic plan to consider the unique needs of rural and urban areas within the council areas, with some respondents suggesting that policies should be tailored to these different contexts. The need for cooperation between authorities to meet housing demands was also highlighted as important.

Overall, respondents requested careful consideration of local specifics in policymaking with a strong focus on managing the environmental impact of development, improving infrastructure to cope with increased demand and preserving the character and amenities of local communities.

Draft Vision and Strategic Objectives

4. Do you agree with the draft Vision?

55.4% of respondents provided no answer.

22.8% of respondents said 'No'.

21.8%¹ of respondents said 'Yes'.

a. If not, what changes would you like to see?

Respondents expressed a variety of concerns and suggestions regarding the future development of their area within the vision. A recurring theme was the need for sustainable development, with a focus on preserving green spaces and heritage.

It was also stressed that the SLP must deliver a mix of sites in a variety of locations in order to be successful and deliverable and that this should

¹ Due to rounding, the answers sum may not precisely add up to 100%

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include sustainable locations within the rural areas. It was further suggested that there should be explicit recognition of the key rural centres in the plan area and the role these play in serving the wider rural hinterland.

There was also a strong emphasis on improving public transport and creating walkable neighbourhoods to reduce reliance on cars.

Many responses highlighted the importance of addressing housing needs through the use of brownfield sites, providing affordable homes and meeting sustainable standards of design and construction. The need for strategic planning to support infrastructure and community facilities was also highlighted.

Decarbonisation and meeting climate change targets were considered crucial, with calls for bold action and consideration of carbon impact in all development choices.

Some respondents suggested using the Gloucestershire Green Belt for development due to its proximity to services and potential for increasing biodiversity.

There was also some criticism questioning the assumptions behind the SLP, with respondents demanding transparency and suggestions to challenge the potential profit motives of developers.

The idea of building on the Gloucestershire Airport site to provide housing was proposed, with the argument that other airports are sufficient to meet the region's needs.

Some respondents suggested a more concise and impactful vision statement, while others stressed the importance of retaining key facilities should be set out, such as the airport to attract businesses and balance the demographic shift towards retirement towns.

It was recommended that the vision address matters of deteriorating housing affordability and recognition of the need for sufficient choice and competition in the housing market. It was highlighted that stimulating economic growth and addressing matters of housing affordability within the Plan Area should go well beyond meeting minimum housing need.

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The provision of key worker housing, particularly for health and care sectors, was also highlighted as a critical need that should be prioritised.

In considering the vision it was stressed by one respondent that the SLP is an exciting opportunity to positively prepare for the future in terms of ensuring sufficient development is allocated, learning from the lessons of the Joint Core Strategy (JCS).

5. Do you agree with the draft Strategic Objectives?

59.8% of respondents provided no answer.

19.3% of respondents said 'No'.

20.8% of respondents said 'Yes'.

a. If not, what changes would you like to see?

Within the draft strategic objectives, respondents expressed concerns about various aspects of urban and rural development, with a strong emphasis on sustainability, infrastructure and community needs.

It was commonly highlighted that a core strategic objective of the Plan should be to meet housing needs in full for the area on a range of sites to secure a consistent, deliverable supply of housing land. It was further stressed that this should include a review of Green Belt where this is necessary to meet local needs.

Many responses highlighted the importance of preserving green spaces for activities like dog recreation and enhancing the natural and historic environment. The integration of new developments with existing communities and the provision of adequate infrastructure, such as public transport, schools and healthcare facilities were also frequently mentioned.

There was a call for strategic objectives to be measurable and for the use of simpler language to avoid ambiguity. Flooding and climate change were major concerns, with suggestions to include planning for flood plains and protecting against the impact of development on downstream areas. The need for a diverse housing supply that meets community needs was also noted.

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The vitality of city and town centres was highlighted as a concern, with suggestions for centres to adapt to changing needs and support a mix of uses. The lack of local supermarkets and adequate parking in the Tewkesbury area was also highlighted. Respondents also mentioned the need for support for home-based businesses and start-up units.

The concept of 'service villages' was criticised for not truly offering services. There was a suggestion for a shared five-year housing land supply target to prevent developers taking advantage by using the 'presumption in favour of development'². Sustainable transport was also seen as a priority, with a focus on reducing reliance on private vehicles.

Economic resilience, support for agriculture, tourism and broadband connectivity were seen as important for building strong economies. There were also suggestions made as to improvements to Gloucester city centre. A further strategic objective within the economic section was suggested which is to advocate a partnership approach to strengthen the urban and rural economies.

It was considered that reference to delivering homes should specifically refer to market and affordable, specialist homes (e.g., older persons), Gypsy, Travellers and Travelling Showpeople and those wishing to build their own homes (self and custom build homes).

Climate change challenges were highlighted, with respondents emphasising the need for decarbonisation and sustainable development. Respondents also provided more detailed feedback on the strategic objectives, calling for explicit reference to net zero goals, inclusivity, affordability and safety.

The inclusion of places of worship in planning was requested to cater to the spiritual needs of incoming families. The protection of Local Green Spaces was proposed to ensure they remain open and accessible to the public.

It was stressed that whilst brownfield first approach is positive, careful consideration must be attributed to the existing urban capacities of Cheltenham, Gloucester and Tewkesbury to determine the realistic level of

² The 'presumption in favour of development' is intended to streamline planning approvals for developments that align with sustainability principles, particularly in instances where local planning policies are out of date or where housing supply targets are unmet.

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growth; given the supply of brownfield land is not infinite. Consequently, it was highlighted as important that the Plan is supported by a robust evidence base that justifies the effectiveness of the spatial pattern of development proposed within the Plan.

Finally, there was a call for higher consideration in building secondary schools to accommodate the growing number of families in areas (such as Quedgeley). There was critique of recent developments as neither well-designed nor beautiful, with recommendations for stricter design criteria and reduced density.

Planning for climate change and nature recovery

6. In what ways do you consider the Strategic and Local Plan can most effectively address the impacts of climate change?

Many respondents considered that improvements to public transport and infrastructure would help address the impacts of climate change with suggestions to make public transport more attractive by providing comfortable, heated waiting areas and live bus progress displays. It was considered important that high quality development should be directed not only to the main urban areas, but also the most sustainable rural settlements to help mitigate against climate change by enabling sustainable development.

There was a strong call for the protection of Areas of Outstanding Natural Beauty and Green Belt land to support biodiversity and natural flood management. Respondents also suggested more robust policies to ensure biodiversity net gain in new developments, criticising the inadequacy of current measures and suggesting the involvement of organisations like the Royal Society for the Protection of Birds (RSPB) to offset biodiversity loss. The creation of green corridors to connect habitats was also highlighted as important.

In terms of building and housing standards in addressing climate change many responses focused on the need for higher environmental standards within developments, including the use of renewable energy sources like solar panels, water harvesting systems and green roofs. There was also a

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call for carbon-neutral housing designs that incorporate passive heating and cooling.

Respondents expressed a desire for better engagement with local communities to encourage participation in climate-positive activities and clearer communication of the strategies and resources available to them.

Nature-Focused urban planning was mentioned with suggestions including rewilding with hedging boundaries instead of fences, less frequent mowing of grass areas to increase biodiversity and incorporating nesting cavities for birds in new buildings.

There was a call for stricter regulations to ban environmentally harmful practices, such as the installation of new wood-burners and to enforce higher standards in development projects, ensuring that developers deliver more than just the minimum requirements.

Respondents were concerned about flooding and demanded no building in flood prone areas. There were some suggestions for flood management measures to be incorporated to mitigate against climate change, with some criticising current dredging practices, suggesting the restoration of wetlands as a more effective solution. There was also a call for Sustainable drainage systems (SuDS) to be incorporated into all new developments.

Some respondents considered that a wildlife emergency declaration should be made to prioritise nature in all council decisions, reflecting concerns about the ongoing loss of biodiversity.

There were suggestions that urban concentration should be planned, leading to a step change to sustainable travel as it was considered that sprawling across greenfield areas would lead to an ecological disaster.

It was stressed that given that the authorities have a declared Climate and Ecological Emergency, it is important to have a clear strategy to ensure that the homes and developments will meet the Governments targets of being net-zero by 2050. It was further suggested that the viability of policy measures that go beyond mandatory requirements (i.e. 10% biodiversity net gain or Building Regulations energy efficiency standards) needs to be fully considered and acknowledged when drafting SLP policies. Another

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respondent suggested that robust evidence clearly setting out local circumstances to justify any enhanced standard will be required.

Overall, there was a strong consensus among respondents for more sustainable urban planning, stricter environmental regulations, enhanced community engagement and a greater focus on preserving and enhancing biodiversity.

7. What measures and standards should the Strategic and Local Plan introduce in respect of the:

a. Construction and operation of new buildings?

It was suggested by many respondents that new buildings should be carbon neutral or carbon plus in operation, with high ambition for the reduction of embodied carbon and that the SLP should make this a minimum requirement. However, it was mentioned that the thresholds could be reduced for affordable homes.

There was a suggestion that the construction process of new homes should be accompanied by a separate Embodied Carbon statement. Conversely it was considered by some respondents that Building Regulations should solely deal with carbon targets. It was highlighted that aligning the SLP with those of Government would be welcomed, but anything beyond these requirements should be supported by robust evidence and explanation. There was also a concern that adding in environmentally friendly requirements will further de-incentivise builders who will be reluctant to reduce profit margins.

There was strong sentiment that the SLP should consider alternative building techniques, with many suggesting building to passivhaus standards. There was a further suggestion that groups of self-builders should be encouraged to work together to source supplies of materials and renewable energy.

Several respondents recommended that the SLP should make provision for effective and comprehensive design codes based on different character areas. It was suggested that houses be designed to fit with the traditional look of each town with their own characteristics to retain separate identities.

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The adaptive retention and reuse of existing buildings was a common theme along with the incorporation of solar, batteries, ground source, heat transfer systems, air source and other renewable sources being made mandatory on new dwellings. It was also suggested that Electric vehicle charging technology should be strongly encouraged in policy and that new buildings should have a 100+ year life expectancy. A further suggestion was for the policies to seek to allow the owners of listed buildings and buildings in conservation areas to improve their energy performance.

In considering new buildings, respondents called for a fabric first approach, using reclaimed materials and construction in line with the Government advice on 'Heat and Buildings Strategy', 'Net Zero Strategy', 'Build Back Greener' and 'Building with Nature'. The advice and standards about construction and operation already set out in the Cheltenham Climate Change Supplementary Planning Document (SPD) was suggested as an excellent example. The incorporation of active travel into new development was also seen as a crucial issue to be dealt with in the SLP.

The requirement for developers to produce robust construction management plans was suggested by several respondents, given the longevity of the impact of construction vehicles on local communities.

There was also a suggestion to increase space standards for dwellings, so there is space to work from home and that plots should be large enough to allow extensions as families expand. A further suggestion was received for garage sizes to be of a size that can accommodate modern car sizes and charging.

Flooding was an issue of concern with suggestions to build on stilts, to design floating homes and to create new bridges in flood prone areas.

Nature and biodiversity were also a common theme of concern in new house building with suggestions for vegetated gardens and providing nesting cavities for building dependent species.

More generally it was considered that local authorities should be given resource and capacity to follow up and ensure strategic climate change objectives are met, delivered and upheld.

b. Retention and reuse of existing buildings?

Respondents expressed a strong preference for the retention and reuse of existing buildings over demolition and new construction. The emphasis throughout was on sustainability, with many advocating for the redevelopment of brownfield sites and the conversion of unused commercial properties into residential spaces. There was a call for financial incentives to make brownfield development more viable and for planning processes to be streamlined to facilitate conversions.

Many responses argued that the plan should introduce measures to encourage the reduction of carbon emissions, improved energy efficiency and the incorporation of sustainable energy production in building retrofitting. A few respondents mentioned specific technologies which they believed should be encouraged as part of these measures. Many suggested the installation of solar panels on existing buildings, particularly on commercial properties with large roof areas. Heat pumps, improved insulation, and the incorporation of green infrastructure into buildings were also mentioned.

There was strong sentiment towards preserving local character and historical significance, with suggestions that regeneration should be sympathetic to a building's historical use. The architectural and historic merit of buildings was highlighted as an important factor in decision-making. The use of sustainable and local materials was seen as imperative for both environmental reasons and to maintain a sense of place and history.

There was a call for flexibility in the use of buildings in city and town centres to prevent decay and vacancy, with the need to retain historic facades while allowing for internal remodelling. The re-use of existing agricultural buildings and brownfield land for new farming methods such as hydroponics³, was also suggested.

The responses indicated a desire for local authorities to adopt clear and robust measures that align with national standards and regulations, avoiding duplication and ensuring that schemes are viable. Some

³ Hydroponic farming is a soil-less cultivation technique. It involves growing crops without the use of traditional soil, instead using a water-based solution.

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respondents suggested that local design codes should be developed to guide the retention and reuse of buildings. One response called for compulsory purchase orders to be used on houses unoccupied for more than a year to address housing shortages. Several respondents highlighted that standards and regulations are dealt with through government and as such the SLP should heed caution on creating bespoke standards which would provide a patchwork of differing local standards.

Overall, there was a consensus among respondents that sustainable development should be prioritised, with a focus on reusing existing structures, improving energy efficiency and respecting the cultural significance of buildings while also considering the economic viability of such projects.

8. Should the Strategic and Local Plan require more than the mandatory minimum 10% Biodiversity Net Gain through development?

59.6% of respondents provided no answer.

16.6% of respondents said 'No'.

23.6% of respondents said 'Yes'.

9. Are you aware of any land that could be identified for environmental purposes, such as wildlife/biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production?

13% of respondents said 'No'.

22% of respondents said 'Yes'.

65% of respondents provided no answer.

10. Which key services and facilities do you think are most important to be provided within easy reach of developments?

Respondents emphasised the importance of having key services and facilities within easy reach of developments to support sustainable living and reduce the need for travel, particularly by private car. The most frequently mentioned services included:

- Healthcare facilities, such as GP surgeries, hospitals, and dental services.
- Educational institutions, particularly nurseries, primary and secondary schools.
- Retail facilities necessary to meet daily needs, including convenience stores, banks and supermarkets.
- Leisure facilities for health and wellbeing, including public open spaces, playing fields, allotments and leisure centres.
- Community facilities, including libraries, village halls, public houses and cafes.

Several respondents also highlighted the need for accessible public transport, safe cycling routes and walkable footpaths to encourage sustainable travel and reduce private car dependency.

Locating employment opportunities near to developments was highlighted as important. A few responses also highlighted the importance of locating places of worship within easy reach of developments. The provision of recreational spaces, community centres and green spaces were also considered essential for the well-being of residents.

Overall, there was a strong consensus on the need for developments to be planned with sustainability in mind, ensuring that essential services are within easy reach to support community health, education and well-being while also addressing environmental concerns.

11. Should we allocate sites in the SLP specifically for renewable energy generation or storage?

90.6% of respondents provided no answer.

2% of respondents said 'No'.

7.3% of respondents said 'Yes'.

If so, what forms of renewable energy would be appropriate and in which locations?

Respondents expressed a variety of preferences for renewable energy types and locations. Solar energy was the most frequently mentioned form, with many suggesting the installation of solar panels should be mandatory for new developments and should be installed on industrial buildings and existing large roof spaces. Wind energy was also a popular choice, with some responses advocating for small-scale local turbines and others for larger installations in suitable locations away from Areas of Outstanding Natural Beauty (AONB)⁴. Hydroelectric power was also suggested, particularly along the River Severn.

There was a strong emphasis on the need for energy storage solutions, such as battery farms, to complement renewable energy generation. The importance of local-level energy generation and storage was highlighted, with a call for all new buildings to include renewable technologies like rooftop solar panels and ground source heat pumps.

Some respondents noted the need for careful consideration of the impact on landscapes and heritage assets when planning for renewable energy sites. Several responses indicated a preference for renewable energy installations to be sited on brownfield or low-value agricultural land rather than greenfield sites. The potential for dual use of land, such as agricultural land also hosting solar farms, was also suggested.

Overall, there was clear support for the allocation of sites for renewable energy generation and storage. Solar and wind power had the most

⁴ AONBs are areas of countryside that were designated for conservation due to their significant landscape value. Now referred to as the Cotswolds National Landscape (CNL).

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support, with many responses highlighting the importance of integrating these technologies into new developments and existing structures. The responses showed a preference towards brownfield land and low-value agricultural land and emphasised the need to minimise impacts on protected landscapes, particularly the Cotswold National Landscape (CNL).

Planning for new homes and businesses

New Homes

12. Should the Strategic and Local Plan use the local annual housing need calculation from the Standard Method?

80% of respondents provided no answer.

9.3% of respondents said 'No'.

10.6% of respondents said 'Yes'.

a. If no, please set out what you consider the councils should use instead.

Respondents expressed a variety of views on the use of the standard method for assessing local housing needs. Within the responses a significant number of respondents supported the standard method as a minimum starting point. However, there were concerns about whether this method reflects actual local needs and whether it can address issues such as affordability and economic growth. Some respondents argued that the standard method does not account for exceptional circumstances that may justify a higher housing need figure, such as economic growth strategies, analysis of affordable housing need, strategic infrastructure improvements or the need to accommodate unmet demand from neighbouring areas. It was also stressed that population projections may change, or the government could suggest a new approach through legislation and therefore the SLP must be suitably flexible as the plan evolves to accommodate potential increase.

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There were also suggestions for alternative approaches to calculating housing needs, such as focusing on local needs and considering economic forecasts and demographic changes. Some respondents suggested that the councils should consider separate housing targets for different types of housing, such as affordable homes, older people's homes and self-builds, and that these should be reviewed regularly, based on up-to-date data.

A few respondents expressed concerns about the suitability of the standard method for determining land allocation, particularly in Cheltenham and Gloucester City, due to development constraints and limited land availability. There was also concern about the potential creation of dormitory areas lacking community feel and employment opportunities.

In summary, while there was support for using the standard method as a starting point, there was also a call for a more nuanced approach that takes into account local circumstances, economic growth potential and other factors that may indicate a need for higher housing figures. There was also a desire for transparency in how housing need calculations are made and for regular updates to ensure that plans are based on the most current data.

13. Are there any constraints or other reasons why the number of houses to be actually planned for in the Strategic and Local Plan should differ from calculated needs?

83% of respondents provided no answer.

8% of respondents said 'No'.

9% of respondents said 'Yes'.

a. If answered yes, please explain further.

Respondents expressed a range of views on constraints and other reasons why the number of houses to be actually planned for should differ from calculated needs. A significant number of respondents argued that there should be no constraints on the housing requirement, suggesting that the

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area can and should plan for a higher number of homes to meet demand and support economic growth.

Conversely, some respondents highlighted various constraints that should be considered when planning for new housing. These include environmental considerations such as the CNL and Green Belt, flood risk areas and the need to preserve rural character and biodiversity. Some respondents also mentioned the pressure on existing infrastructure such as roads and healthcare services. There was also a sentiment that economic and population growth may not be compatible with the green agenda. Some respondents felt that development is changing the character of their communities.

Many argued for an increase in housing targets to address various local factors and needs, such as economic considerations, affordability challenges and demographic changes. Respondents highlighted that the Standard Method does not fully capture local housing affordability issues, especially given the cost-of-living crisis, and suggested that local multipliers should be applied to ensure adequate housing delivery. The need for overprovision to account for unforeseen delays in site development, particularly when relying on a small number of large sites was also highlighted. The potential change in government and Labour's housing pledges were also cited as reasons to plan for more homes than the Standard Method suggests.

A significant number of respondents agreed that the housing requirement should not be constrained and should reflect the full calculated housing need for the area. Several responses highlighted the need for a balanced portfolio of sites, including both strategic growth locations and smaller, sustainable sites, to avoid reliance on speculative proposals.

The presence of Green Belt or Areas of Outstanding Natural Beauty was acknowledged, but many argued that these should not impose constraints on housing ambitions. The need to consider unmet needs from neighbouring authorities was frequently mentioned, suggesting that the housing requirement may need to increase to accommodate this unmet need.

Some respondents advocated for a flexible approach that includes a buffer to ensure delivery matches identified needs, while others called for separate

targets for different types of housing such as affordable homes and homes for older people.

Overall, there was a clear divide between those who believed that the SLP area can accommodate more housing without constraints and those who felt that environmental and infrastructure considerations must limit growth. The need for a balanced approach that considers both growth and sustainability was a recurring theme throughout the responses.

14. Are there any specific types, sizes or tenures of housing that the SLP should require for particular groups in the community?

87.3% of respondents provided no answer.

1% of respondents said 'No'.

11.6% of respondents said 'Yes'.

a. If so, please explain further.

Respondents highlighted a variety of housing needs, with a strong emphasis on the provision of affordable housing, particularly for the elderly, young people, service families and those with disabilities. There was a notable call for more bungalows and low-rise options for the elderly and adaptable housing that can cater to changing needs.

There was also a strong sentiment against the development of large, luxury homes, with calls for higher density development on brownfield sites in addition to more starter homes, smaller units and rental properties suitable for young adults and first-time buyers. The need for self-build policies which reflect local demands was also highlighted. It was stressed that this is a statutory duty of local authorities and the best way to meet the need is to allocate sufficient sites and plots.

Several responses indicated a need for social housing which is integrated within communities and housing that is accessible and suitable for people throughout their life stages, including those with disabilities.

The impact of second homes and short-term lets on local housing availability was also mentioned as matters of concern, with suggestions for tighter controls to ensure homes are available for local residents rather than standing empty. It was further highlighted that self-build policies were proposed to meet specific demands and reflect local connections.

There were a high number of responses that provided no answer to this question. However, of those that responded, the answers suggested a flexible policy approach that reflects both housing need and demand. There was general consensus on the need for diverse housing options that cater to different demographics and lifestyles, with an emphasis on affordability, suitability for the elderly and integration within communities.

Traveller Communities

15. Should sites for traveller communities be provided as part of large developments for housing and/or employment?

93% of respondents provided no answer.

4% of respondents said 'No'.

3% of respondents said 'Yes'.

16. Are there any other ways that sites for traveller communities could be met in our area?

Respondents expressed a variety of views on how sites for traveller communities could be met in the area. A common theme was the need for proper engagement with traveller communities to understand their needs and ensure that site allocations are suitable and deliverable. There was scepticism about the success of including traveller sites within large developments, with some respondents suggesting that criteria-based policies and the expansion of existing sites may be more appropriate.

Several responses highlighted the importance of integrating traveller communities into the wider community to improve social cohesion. The use of brownfield sites and unused car parks was suggested as suitable

locations for sites, as well as ensuring travellers have access to community facilities like schools and shops.

A few responses called for a more active approach from councils in seeking out new sites and suggested that there is a moral obligation to provide adequate sites for traveller communities. Some respondents suggested making traveller site provision mandatory for new developments over a certain size. There was also mention of the need for proper planning enforcement and control of sites.

Overall, a high number of respondents provided no answer to this question. Of those that responded however there was a recognition of the need to address the accommodation needs of traveller communities, but opinions varied on how best to achieve this, with an emphasis on engagement, integration and appropriate site selection.

17. What site characteristics and locations would be most suitable for different traveller communities?

There were a number of mixed responses to what site characteristics and locations would be most suitable for different traveller communities. It was recognised that there is a moral obligation to provide adequate sites for traveller communities vulnerable to poverty, poor educational and health outcomes and discrimination.

The vast majority of respondents suggested that rural areas should be used for gypsy and traveller site provision. It was generally noted that sites should be away from existing settled communities, whilst avoiding both sensitive landscapes (including the Green Belt) and 5G masts. Conversely some respondents suggested that urban areas and/or brownfield sites would be better locations for traveller communities.

There were also calls for locations to be semi-rural or edge of built-up areas to help facilitate employment opportunities and to enable the gypsy and traveller community to keep their livestock whilst allowing access to existing amenities and services. It was further suggested that good access to education and healthcare should be a high priority.

It was recommended that existing sites should be developed and intensified. Another recommendation was to actively allocate new areas in

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the Tewkesbury Garden Communities / other large-scale developments. It was further highlighted that sites should be protected and enhanced for the traveller communities to encourage these groups to adopt these areas as their responsibility and something to conserve.

It was generally noted that travellers need a large land take with sufficient sizes to enable grazing, adequate washing facilities, access to clean water and areas to break metal, etc. However, it was also generally stressed that the number of pitches on each site should be small (e.g. 4 – 8) as it was considered that they tend to be better maintained and integrated into the wider community. It was noted that if a site is too large it can lead to tensions within the traveller community and encourage anti-social behaviour, consequently impacting on the surrounding settled communities.

It was highlighted that travellers who live on permanent sites all year still like to retain their sense of tradition and their ability to travel so access to major road networks, e.g. motorways or major A roads, (even in more industrial areas) should be a high priority.

It was stressed that the requirements for a travelling show person and a traveller gypsy are very different, when considering sites and this needs to be recognised. Also, it was noted that no specific question was asked concerning the boat dwelling community and that this should be addressed. It was stressed that boat dwellers need access to services such as water, electricity, pump out or direct sewage connection, parking and waste disposal and that these should be provided as part of the development to prevent pressure on existing services. It was suggested that early engagement with the Canal & River Trust would help identify issues at any particular suggested location in this regard.

There was a suggested traveller site in Cheltenham proposed as part of this question and a further extension of an existing site at Woodmancote also suggested for consideration.

A small number of respondents stated that they would not support the provision of any new traveller sites in the SLP area with some stressing that appropriate planning permissions and Council Tax levied and enforced should be a priority for existing sites.

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It was suggested that the Gypsy and Traveller Accommodation Assessment (GTAA) report already provides the advice. This existing evidence should be used to identify key movement corridors and existing locations of those communities (using Dr Simon Ruston's up to date policy criteria for assessing locations⁵). The importance of backing this up with discussions with those communities and potential landowners exploring future development options was also stressed.

Jobs and the economy

18. What economic and regeneration needs should the Strategic and Local Plan address in supporting businesses to invest, expand and adapt?

Respondents highlighted a range of economic and regeneration needs for the SLP to address in supporting businesses to invest, expand and adapt. A recurring theme was the need for the revitalisation of town and city centres, with suggestions to repurpose empty sites for temporary business or leisure uses to maintain footfall. There was a call for more affordable housing to accommodate young professionals and skilled workers and for a focus on manufacturing and agriculture to reduce reliance on imports.

The need for the SLP to cater for the increasing number of work-from-home arrangements was highlighted, as well as the importance of integrating infrastructure with business locations. The importance of creating employment availability before starting housing development was also highlighted. There was a call for increasing the range of housing types and tenures to meet specific needs of high value industries and services.

There was also a call for prioritising small businesses with flexible and shared office spaces and intensifying the use of brownfield sites for business and industry. High-tech industry investment, particularly in cyber and engineering, was seen as an area for encouragement. It was also suggested that there should be a push for investment in green energy and local food production.

⁵ <https://www.gypsy-traveller.org/resource/planning-reforms-december-2024-impacts-on-planning-for-gypsy-and-traveller-communities/>

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Several respondents emphasised the need for good road infrastructure as well as the need to designate land near train stations for businesses to encourage the use of public transport networks for commuting.

Support for existing businesses to expand and adapt was highlighted, with suggestions focusing on lowering business rates to retain town centre shops and creating attractive places to work.

Some responses received were specific to local projects, such as support for the Cyber campus west of Cheltenham centred on GCHQ and the importance of considering the service economy, particularly in relation to transport infrastructure like bus depots.

It was urged that the SLP should caution against taking an approach to the provision of economic development land influenced by past trends with a recommendation that the SLP should take an approach to employment land provision that brings forward sufficient land at appropriate locations to meet economic growth aspirations and plan for new housing at a level to facilitate that growth.

Overall, there was a clear demand for strategic planning that supports business growth, adapts to changing work patterns and integrates economic development with sustainable infrastructure and housing.

19. How should the Strategic and Local Plan best seek to accommodate employment needs and provide an environment that is attractive to inward investment?

Respondents expressed a variety of views on how best to seek to accommodate employment needs and provide an environment that is attractive to inward investment. A recurring theme was the importance of sustainable development, with suggestions for a zero-carbon energy provision, active travel and robust digital infrastructure. The enhancement of transport links, including better public transport to rural areas and the development of road networks, was also seen as crucial.

Several responses highlighted the need for strategic employment zones and the allocation of land for employment use, while others suggested repurposing derelict industrial buildings as workspaces. The potential for

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capitalising on the growth of the cyber industry and sustainable energy research was mentioned, as well as the importance of providing housing development for adjacent employment areas.

Concerns about traffic congestion and the need to reduce commuting times were noted, with some respondents arguing for the creation of employment opportunities in rural areas to avoid them being overly concentrated in large towns and cities. Some respondents also highlighted the importance of providing employment opportunities which cater to local communities.

Incentives for businesses, such as discounts on business rates and support for training facilities, programmes and apprenticeships, were also mentioned as ways to attract inward investment. The need for a variety of employment sites to meet different sector requirements was emphasised, along with the potential role of heritage-led regeneration in finding new uses for heritage assets and creating attractive investment environments.

Overall, respondents advocated for a balanced, sustainable approach to economic growth that leverages local strengths, improves connectivity and distributes opportunities across urban and rural areas while being mindful of environmental impacts and existing community assets.

20. How should the Strategic and Local Plan support and encourage rural employment?

In considering how the SLP can support and encourage rural employment a recurring theme was the need for sustainable development that does not compromise the environment or local agriculture. Many respondents emphasised the importance of preserving agricultural land and promoting food security by encouraging local food production.

There was a strong call for improved infrastructure, particularly high-speed internet connections, to enable remote working from homes in rural areas and support businesses that do not rely on extensive physical networks. Respondents also suggested that the SLP should facilitate the diversification of farms into other business areas, such as tourism or renewable energy.

The need for affordable housing for rural workers was highlighted, with suggestions indicating that this could help attract and retain employees in

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rural areas. Some respondents were concerned about the impact of new housing developments on rural employment, highlighting that while enabling well-located housing development is important in attracting and retaining rural workers and businesses, it is equally important that housing is built with the needs of local populations in mind.

Transportation improvements were frequently mentioned, with some respondents suggesting better public transport links connecting rural areas to urban centres and employment hubs will attract businesses to these locations.

There was also a sentiment that planning rules should be eased for farms wanting to diversify and for small businesses in rural areas. There was however some caution against overdevelopment of green fields and suggestions that the SLP should protect the rural environment. It was further highlighted that allocating sites for employment uses within or adjacent to settlements would support and encourage rural employment.

In summary, respondents want the SLP to promote sustainable rural employment through improved infrastructure, the protection of agricultural land and support for local food production. Key issues that were highlighted included affordable housing for rural workers and better transportation links. It was generally considered that flexible planning policies that allow for diversification and small business development should be incorporated.

Retail and town centres

21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?

In terms of how the SLP can best enable change and encourage investment to support our city and town centres respondents expressed a variety of suggestions and concerns with a recurring theme being the need for improved accessibility and transportation. Many respondents advocated for better public transport, cycling links and an improved parking provision. The idea of converting upper floors of retail buildings to residential use was also popular, as it was felt that it could increase city centre populations and thus support local businesses.

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Several responses highlighted the need for urban renewal and densification, suggesting the repurposing of existing buildings for new businesses or accommodation, and the development of housing within town centres to support local shops and services. There was a call for the protection of town centres and a resistance to out-of-town retail parks, which some respondents considered as detrimental to local businesses and traffic congestion.

Crime and safety were also mentioned, with one respondent noting the impact of crime on businesses and suggesting that changes are needed to safeguard them. The importance of creating a safe, accessible and welcoming environment for pedestrians was emphasised. There were suggestions for wide, well-lit, and secure pavements and the integration of green infrastructure such as trees, rain gardens, and wildflower spaces to enhance the urban environment.

Respondents emphasised the need for mixed-use developments in city and town centres, combining residential, business and leisure spaces, with a particular focus on redeveloping brownfield sites. There was a call for a shift from retail to residential spaces, with improved transport systems and health facilities.

Overall, respondents expressed a clear request for strategic planning that supports the evolution of city and town centres into vibrant, accessible and multifunctional spaces that cater to the needs of local communities.

22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?

Respondents considered that there were ways in which the SLP can protect and encourage essential shops, services and facilities in villages and rural areas. One popular view was to allow limited housing in villages (particularly affordable housing) to ensure an optimum population that could be achieved by introducing policy criteria in place of settlement boundaries.

It was stressed that the SLP should resist further urban extensions to Cheltenham and Gloucester and support small-scale development at dispersed rural locations supported by good public transport links that will

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support the viability of rural areas. Another respondent suggested that the villages and rural areas should not be subsumed into urban sprawl with another suggesting that the SLP recognise the role of Key Rural Service Centres to reinforce their vitality and viability, as well as further reinforce their sustainability.

It was generally considered that growth in rural areas would help encourage banks/post offices to maintain a presence and encourage the provision of sustainable transport options. Providing well-lit, well-overlooked, safe pedestrian routes, would make it possible for residents to use facilities without having to use their car.

Another suggestion was to ensure housing is for people working locally and not commuters and that rural properties should not be allowed to be holiday homes, Airbnb's or second homes. There was also a suggestion that the SLP gives consideration to applying the '20-minute neighbourhood'⁶ approach to rural areas.

Respondents highlighted the importance of retaining corner shops, rather than the big supermarkets. There were a number of suggestions to ensure they are retained including:

- assessing the impact of new supermarket chains on existing small shops;
- reducing or removing rates for small shops;
- encouraging volunteer staff;
- facilitating green infrastructure improvements;
- utilising the High Street Rental Auctions power in rural areas;
- introducing health representatives (e.g. district nurse);
- facilitating shared community ownerships; and,
- introducing a mix of uses that could be co-ordinated by the councils.

It was further stressed that a strategic policy be included within the SLP that guards against the loss of all community/cultural/social facilities in line with paragraph 97 of the National Planning Policy Framework (NPPF) (December 2023) unless alternative facilities can be secured in the locality. There was a

⁶ Also known as '15-minute cities' - <https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>

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call for policies to require a clear marketing period for community uses before the loss be allowed.

Many respondents were concerned about ensuring that better transport links that are easily accessible and well published are integrated into new rural development. There were suggestions to ensure cheaper parking and regulating and driving down taxi fares. There was a further suggestion that existing car parks should not be sold off to developers.

There was a call for community hubs with suggestions that these hubs should connect rural areas together with urban centres. It was suggested as part of this concept that autonomous electric or hydrogen powered transport should be available to all, to transport goods or people at any time. It was stressed that the rural mobility hub concepts would provide pass through trade as well as facilitating local use to sustain rural areas.

There was concern about out-of-town development with respondents suggesting that these should be prevented and that large supermarkets should no longer be the usual retail model, but smaller units for use by local businesses should instead be provided at low rent. It was further suggested that existing businesses should be provided funds to renovate and update their services.

It was recommended that Section 106 and Community Infrastructure Levy (CIL) money from developments be used primarily to benefit the villages concerned with promotion and enhancement of existing amenities and services to encourage people to stay local. There was also a suggestion for the SLP to facilitate developer funded council facilities, NHS facilities and schools.

There were comments received that highlighted the importance of maintaining the rural economy to sustain rural facilities and services. Suggestions included to facilitate lower rents and for landlords to be made to upkeep empty units. Further suggestions included supporting growth sectors of the rural economy such as locally grown or locally reared food, sustainable forms of tourism, renewable energy generation and schemes to capture carbon in soils, trees etc. There was also a call to encourage farm shops, allowing them to sell a more diverse range of goods not just from their own farm but from the local economy.

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Some respondents noted that the retention of rural services and facilities is extremely difficult as there is a lack of sufficient demand, noting the difficulties of supporting such facilities if people are not prepared to make use of them. Another considered that it is market led and only survives if there is sufficient support and that it should be left to the retail market to decide if premises are financially viable.

There was a suggestion that policy criteria could apply in place of settlement boundaries, for example by identifying a list of services which a development should have good access to as a means to facilitating sustainable rural development.

Infrastructure

23. What types of infrastructure do you consider are most critical to be delivered alongside new development?

Respondents emphasised the importance of sustainable and active travel options, such as improved public transport links, dedicated cycle paths, and pedestrian infrastructure. Many respondents highlighted the need for green spaces and the management of surface water runoff to prevent flooding. There was a strong call for essential services like schools, healthcare facilities (including GPs and dentists), and local shops to be readily accessible. The adequacy of sewerage systems and the capacity of roads to handle increased traffic were also common concerns.

Transport infrastructure was a recurring theme, with suggestions for better rail access, tram systems and an integrated transport policy that includes sufficient parking spaces. Investment in Junction 10 of the M5 was specifically mentioned.

The impact of new development on climate change was noted, with recommendations for policies that discourage car use and promote sustainable travel. Respondents also mentioned the need for zero-carbon energy infrastructure and digital connectivity.

The importance of planning development in a way that does not exacerbate existing infrastructure deficits was emphasised, with some suggesting that each strategic development location should have its own

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infrastructure delivery plan. The need for natural flood management and the prioritisation of natural features in urban planning were also highlighted as important.

Overall, there was a consensus on the need for a holistic approach to infrastructure planning that considers the unique needs of each development area and integrates sustainable practices to support community well-being and environmental resilience.

24. Given their size, if strategic scale new settlements were to form a part of the Strategic and Local Plan, what accompanying infrastructure would be necessary?

The following infrastructure was suggested as necessary to support a strategic scale new settlement:

Infrastructure Type / Theme	Suggestion
Transport	<ul style="list-style-type: none"> • Transport Hubs • New Bridges • Autonomous electric and hydrogen powered vehicles • Affordable school transport • Electric Vehicle (EV) Charging Infrastructure • Trams • Road and Rail improvements • Parking • Links to existing settlements • New access points to the motorway and train stations • Access to rail facilities (passenger and freight) • Dedicated cycle lanes • Mass Transport Infrastructure • New Bus Links • New Highways and Transport Links • Retail and Employment Hubs • Public Transport

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Education	<ul style="list-style-type: none"> • Schools and Nurseries
Health	<ul style="list-style-type: none"> • Pharmacies • Hospitals • Dentists • Medical Facilities
Water	<ul style="list-style-type: none"> • High quality Water Supply • Sewerage Infrastructure • Flood Prevention Measures
Utilities and digital	<ul style="list-style-type: none"> • New Power Supply • Telecommunications • Digital Infrastructure
Community, public and social services	<ul style="list-style-type: none"> • Fire and Rescue Services • Ambulance Services • Police Services • Library Services • Youth Services • Post Office • Community Centres
Sport and recreation	<ul style="list-style-type: none"> • Exercise Routes • Play Areas • Strategic Sports Facilities (indoor and outdoor) • Playgrounds • Sports Facilities
Green and blue Infrastructure	<ul style="list-style-type: none"> • Formal Parkland • Community Orchards • Allotments • Green Infrastructure
Other	<ul style="list-style-type: none"> • Youth Activities • Nightlife & Music venues • Petrol Station • Environmentally friendly housing • CCTV coverage • Care Homes • Renewable Energy Infrastructure • Supermarkets • Accommodation / Support services for older people

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	<ul style="list-style-type: none">• Shops• Employment Uses
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A key consideration within responses was the viability of the infrastructure required to support strategic scale development. There were suggestions that the infrastructure should be proportionate and considered on a case-by-case basis. It was highlighted that this would ensure that development can be delivered to meet the needs arising, and for mitigation measures to limit impacts on existing communities without unduly impacting on viability.

Other responses suggested that the requirement for early delivery of infrastructure to 'pump-prime'⁷ such sites often means that the viability of new settlement provision is challenging. The suggestion was to instead commit to the delivery of housing during the early-mid years of the plan period from other sources that are less reliant on significant preparatory infrastructure works. It was considered that this would ensure that the supply trajectory is even and secure.

Related to this were comments received on phasing and associated adequately timed infrastructure. One respondent suggested the SLP to look to the Commission for the New Town/English Partnership model where on larger schemes permissions were clearly phased to ensure that the necessary infrastructure (physical and social) was provided before all the houses were built. It was further recommended that a specific phasing policy (rather than equalisation figures) be attached to the larger allocations to give clarity to developers at the outset and avoid viability arguments at a later stage.

Another respondent highlighted that it is important to acknowledge that external public funding may be required to help secure deliverability. There was also a suggestion that the question should be addressed in a separate piece of professional assessment of future growth and necessary infrastructure and that a regulation 18 consultation is not the place to ask a question of this complexity.

⁷ Used to describe the process in which money is invested.

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Transport provision was a significant theme in the responses with concerns that the road network would need to be substantially upgraded to facilitate access, and that public transport infrastructure would need to be provided to support sustainable travel. It was seen as imperative that careful scrutiny is given where new highway infrastructure is identified, to ensure that it complements and facilitates more sustainable transport options. It was also stressed that whilst careful master-planning is essential to maximise “containment” of trips, it is also critical to consider interactions with the existing transport network. It was particularly considered that opportunities to link with and enhance existing or planned public transport provision to prevent reliance on the private car for longer-distance trips should be paramount.

It was recommended that streamlining travel between a network of transport hubs, with provision for segregated public transport and (in the medium term) driverless public transport vehicles should be given consideration in strategic new settlement planning. A final suggestion was that active travel should be such that you shouldn't need to own a car if you live in a new settlement.

Issues related to the Tewkesbury Garden Town were noted with specific concerns raised. One concern stressed the importance of a co-ordinated approach for the planning of transport infrastructure (particularly major improvements to Junction 9 (M5)) to enable development at Tewkesbury / Ashchurch. It was considered crucial to also include development in the Mitton area within the SLP. In addition, the importance of an overall plan or strategy to identify requirements for upgrades to the local road network and sustainable travel infrastructure in this area was stressed. It was suggested that the role and delivery timetable of Ashchurch needs to be managed so that key infrastructure is delivered alongside new development.

Another issue raised in relation to the Tewkesbury / Ashchurch area was that priority to ensuring suitable employment opportunities aligned with future market needs and future housing development locations should be given. It was highlighted that facilitating sustainable travel for commuting to workplaces should be considered. It was also stressed that new employment sites that result in significant increases in traffic using the Strategic Road Network may not be sustainable.

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It was recognised that it is essential for the infrastructure for the Garden Town concept to be clearly laid out in the SLP. Thus, providing the important policy 'hook' that Government requires in the emerging plan to enable progression of the infrastructure through the business case process.

One respondent, considered that the Tewkesbury Garden Town, is a once in a generation opportunity to be truly visionary in planning a new approach to sustainable living. It was suggested that it could be designed in harmony with the landscape, prioritising broad wildlife corridors, creating high quality habitat and that it should strongly involve the local community in its design.

With regards to more general sports provision, it was noted that strategic scale new settlements typically require significant investment into larger community facilities. It was therefore considered critical that an assessment is made as to the needs of the proposed new settlement and its neighbouring areas. The respondent urged the SLP authorities to ensure their sports facilities strategies are up to date, and that they have clear guidance on developing active travel solutions, play provision and access to open spaces.

There were also concerns raised about recognising the areas vulnerability to flooding and how covering green fields with concrete and tarmac to provide additional housing will only make the problem worse. It was suggested that flood prevention measures should be a crucial part of the Plan. It was also considered that comprehensive downstream flooding prevention measures may also be needed, as well as enhanced capacity to water supply and sewerage infrastructure. It was proposed that the Plan should require 'Grampian conditions' to ensure the necessary water supply and sewerage infrastructure is secured.

Several respondents highlighted that new settlements can have long lead in times and that reliance on these can often mean delivery will occur later on in the Plan period. It was therefore stressed that this increases the importance of the need for a range of other sites to be provided to ensure a five-year housing land supply and early delivery of housing. Additionally, it was suggested that any decision to include a new settlement should be informed by an appreciation that such a project is likely to have a horizon that extends out around 25-30 years from inception.

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It was also noted that neighbouring districts should be given early consideration to the strategic and local infrastructure that may impact services and facilities in their areas. The respondent stressed that infrastructure demands and pressures don't stop at district boundaries and strategic scale new settlements won't necessarily be self-contained in terms of infrastructure usage. It was requested that a detailed Infrastructure Delivery Plan be produced to support new developments and consider cross boundary impacts.

It was highlighted that if development is going to be resilient to climate change and support nature recovery, then high-quality, multifunctional, well-connected green (including blue) infrastructure must be a fundamental element of all development. There were suggestions that new settlements should make a commitment to everyone living within 15 minutes' walk of accessible biodiversity-rich green space, in line with Natural England's Accessible Natural Greenspace standards. Furthermore, it was suggested that they should also meet the Building with Nature standards, walking infrastructure that is compliant with Manual for Streets / Healthy Streets guidance and that Local Transport Note (LTN) 1/20 compliant cycling infrastructure is provided. It was also stressed that renewable energy infrastructure including local heat networks and ground loops and local solar and wind generation should be given priority.

In terms of employment, it was stressed that new settlements only work if there is already access to employment and services and unless this is in an advanced state of planning, it will arrive too late for the success of the settlement. However, it was noted that further developments of new settlements could provide a significant contribution to employment.

25. What key services and facilities do you consider most important in deciding if a rural settlement is a suitable location for new homes and other forms of development?

The following infrastructure was suggested as necessary in consideration of deciding if a rural settlement is a suitable location for new homes and other forms of development:

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Infrastructure Type / Theme	Suggestion
Transport	<ul style="list-style-type: none"> • Public Transport • Charging Points • Parking • Easy Access to a larger centre • Safe and Sustainable access to other communities
Education	<ul style="list-style-type: none"> • Schools / Nurseries
Health	<ul style="list-style-type: none"> • Pharmacies • Access to Hospitals • Doctors Surgery • Dentists • Chemist
Water	<ul style="list-style-type: none"> • Reliable Water Supply
Utilities and digital	<ul style="list-style-type: none"> • Utilities • Fast Broadband Connection
Community, public and social services	<ul style="list-style-type: none"> • Postal Service • Emergency Services • Social/Meeting Facilities • Post Office • Community Hubs • Community Areas
Sport and recreation	<ul style="list-style-type: none"> • Sports Clubs • Playing Fields • Indoor Sports Facilities • Community Recreational Facilities • Leisure/Sports Facilities • Exercise Routes
Green and blue Infrastructure	<ul style="list-style-type: none"> • Green Infrastructure • Formal Parkland • Allotments • Open Space
Other	<ul style="list-style-type: none"> • Housing Mix • Restaurants • Cultural Venues • A Medium-Size Superstore

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	<ul style="list-style-type: none">• 'Meantime' Spaces• Youth Activities• Nightlife & Music Venues• Petrol Station• Food Store• Retention of surrounding Green Belt• Local Shops• Pubs• Employment Opportunities• Local Jobs
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Many respondents stressed the importance of transport connectivity and sustainability as key factors in determining if a rural settlement is suitable for development, particularly with regards to road safety, public transport and alternative travel options. The need for a safe and efficient local road network, considering existing stresses like flooding, school buses, and cycle routes was emphasised. It was suggested that it should be possible in the future to live without a car in rural areas, highlighting the necessity of public transport and the integration of walking and cycling infrastructure.

There were concerns raised about rural roads becoming overloaded with private vehicles, with a suggestion to reopen old railway lines or dedicated busways to address this. An additional concern highlighted the importance of considering transport links when deciding on new rural developments, as lack of alternatives can lead to residents becoming isolated.

It was emphasised that local communities should be supportive of change, particularly regarding transport, and should ensure roads can handle any increased traffic. Many respondents considered that active transport (walking, cycling) should be prioritised, and access to services via these means should be considered a priority.

It was suggested that locations with good existing public transport connections, especially to larger settlements and strategic road networks, are optimal for development. Conversely it was considered that rural areas with poor transport options may struggle to meet sustainability and climate change goals due to the reliance on cars. A good example was cited as at

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Bishops Cleeve which show the benefits of good transport infrastructure, with ongoing enhancements like cycleways.

Respondents noted the challenges of balancing growth in rural settlements with preserving the rural way of life. It was highlighted that small-scale developments, targeting wealthier individuals, are common but often don't require basic services whereas larger developments will necessitate the provision of essential services. It was consistently stressed that the necessary infrastructure (such as schools, shops, and healthcare) should be established before new homes are built, and this will help avoid over-reliance on cars.

It was suggested that rural development should be organic, in small increments and avoid overwhelming existing settlements. It was considered that proposals should support the growth of "service villages" that cater to surrounding communities. It was also stressed that new developments should not be concentrated near urban areas like Cheltenham and Gloucester but instead should focus on those areas with good public transport links to sustain local services. Respondents highlighted that development should enhance community cohesion and not disrupt it. It was also suggested that new development can bring essential services to areas without them, making them more sustainable and this should be recognised in the SLP.

It was recommended that policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Furthermore, it was suggested that where there are groups of smaller villages, where one village provides services to the others, incremental development in one may help support these shops, services and facilities. A good example of a similar policy at Cotswold District was cited.

There was a suggestion that the SLP should focus on improving villages and neighbourhoods, rather than preventing growth. The importance of preventing rural areas from becoming commuter towns or second-home hotspots by ensuring balanced community development, including jobs, services, and a mix of residents was also emphasised.

Another concern frequently raised in relation to development at rural settlements was flood risk and the loss of green fields due to development. One respondent commented on the decision to build a flood detention

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basin at Twigworth Green. They stressed that despite minimal occupancy, nearby areas have already experienced significant flooding leading to disrupted access to the new development. This highlighted the concern that Sustainable Drainage Systems (SUDS) will only offer limited protection. Another respondent was anxious about the loss of good agricultural land and highlighted the need for farmers to keep producing food to feed an increasing population.

Respondents also noted the importance of enhancing utility infrastructure, preserving natural landscapes, and promoting environmental sustainability in rural settlements. It was emphasised that there is a need for economic growth and a thriving circular economy in both urban and rural areas. It was suggested that strategic housing development near employment centres, like Ashchurch Business Centre, can support this economy, reduce reliance on private vehicles, and encourage sustainable transport.

The importance of integrating nature recovery networks, wildlife corridors, and community involvement in sustainable development planning was highlighted. Another respondent considered that energy for an all-electric future should be priority.

Cross-boundary impacts were also highlighted to ensure that adjoining districts can facilitate a joined-up approach to development. It was also considered that accessibility to green spaces and countryside for healthy living and biodiversity improvements must be prioritised in development proposals.

26. Should the Strategic and Local Plan safeguard sites or routes for longer term infrastructure projects?

88.6% of respondents provided no answer.

1% of respondents said 'No'.

10.3% of respondents said 'Yes'.

Planning for sustainable development

27. Are there any additional development scenarios that should be considered?

90.3% of respondents provided no answer.

3.6% of respondents said 'No'.

6% of respondents said 'Yes'.

a. If yes, please describe what they are.

The following additional development scenarios or observations were received from respondents and split into recurring themes:

Infrastructure Type / Themes	Detail
Additional Brownfield / previously developed land scenarios	<ul style="list-style-type: none"> • Moving forward, the emerging Strategic and Local Plan should favour brownfield sites that can be expanded within the open countryside to meet the future development needs. • Use of cleaned up industrial sites, utilising unused or underused offices, shops and other existing buildings must be considered before any further rural developments. • Repurposing of town centres and empty premises should be considered.
Additional urban focused scenarios	<ul style="list-style-type: none"> • Suggest urban densification. More people living in and using shops, services and facilities in the main city and town centres. Bringing more life and vitality to the city and town centres,

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	<p>including at night. Concentrated development in urban areas would support the use of bus and rail, walking, cycling and car clubs.</p> <ul style="list-style-type: none">• Suggest a hybrid model which blends urban concentration and urban extensions, adopting a sequential approach to focus on urban concentration, using densification and higher rise development, where appropriate.• Suggest only use brownfield sites for development How can we secure our food supplies if we continue to build on green field farmland?• Recommend revitalising the centres of Cheltenham and Gloucester, which is already happening in Gloucester.• Suggest a model for the regeneration of Gloucester City Centre, encouraging wealth back into the city to support retail and the night time economy and generate a more conducive atmosphere to live and invest.• The urban extensions and urban concentration scenarios could be expanded upon with the consideration of smaller scale extensions to existing communities in order to complement the urban concentration and larger scale extensions.• The focus should be on housing in existing towns and cities. By regeneration of these areas private vehicle use is reduced, the local economy is stimulated and there is reduced usage of construction materials.
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	<ul style="list-style-type: none"> • Suggest sympathetic new growth around the existing larger towns (Cheltenham, Gloucester, Tewkesbury, Bishops Cleeve, Winchcombe), where the infrastructure has the ability to accommodate this and where this is sympathetic to the form and structure of each settlement.
<p>Blended / Mix of proposed scenarios</p>	<ul style="list-style-type: none"> • Consideration for in-between scenarios - instead of one large strategic development consider two or three smaller developments, big enough to bring the required infrastructure. • It is important to acknowledge that development on brownfield sites in the urban areas alone will be insufficient to meet housing needs and that the most sustainable, and importantly deliverable strategy will include a range and choice of sites both within and outside the green belt. • Suggest another development scenario - a combination of urban concentration, urban extensions, new strategic settlements, rural dispersal, and development along sustainable transport routes. In this scenario, we would also like to see the plan make use of emerging technology. Modular, off-site constructed eco homes could meet housing need in a shorter timescale and with less impact on the environment. • Recommend a blended solution with emphasis on Strategic settlements. All other scenarios should be included, but

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	<p>urban extensions should be minimised, especially in Green Belt, and particularly where they have long and tenuous transport and infrastructure links to the centre(s).</p> <ul style="list-style-type: none"> • A combination of increased density and concentration in urban areas, with urban extensions allowing for some Green Belt releases to protect the wider natural landscape areas of the Borough, and focused within a clearly defined sustainable transport corridor, together with allowing for one or two new strategic settlements for later housing provision would achieve the overall housing targets identified.
Alternative scenarios	<ul style="list-style-type: none"> • Larger expansion of existing towns (not just urban extensions). • There does not appear to be a scenario which directs growth to locations which have access to a base level of facilities. • Suggest a do-nothing scenario. Assume no population increase based on birth rate. • Absent from the scenarios is any focus on 'Sustainable settlements' to capture those settlements with good range of employment, services and facilities and the potential to accommodate growth. The authorities should look at sustainable locations to meet a substantial proportion of the housing needs and to deliver sustainable development in their own right. • Consider it is best to build in small

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	<p>pockets next to existing small towns. A few hundred houses in each area and a small business park/school/shop is needed, not massive housing estates where thousands of people go to live.</p> <ul style="list-style-type: none"> • Suggest there are smaller sites that are currently in the Green Belt which contribute little to Green Belt objectives but remain protected. These would simply round off development in parts of Cheltenham and Gloucester to help deliver much needed local/affordable/specialist housing in well located sustainable, safe locations within walkable neighbourhoods. • Suggest it might be useful to consider strategic settlements around 2000-3000 homes. This size would be sufficient to justify the provision of a new primary school and small village centre.
<p>Additional transport focused scenarios</p>	<ul style="list-style-type: none"> • Better public transport to meet Net Zero carbon targets. • Detailed analysis of how the transport system could be made more sustainable by properly integrating new development to reduce unnecessary movements. • A scenario with an additional River Seven crossing from the Forest of Dean (A48) to Gloucester (A38). • Sequentially, strategic growth options should first be focused on the County's primary transport corridors, with the

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	<p>larger strategic growth options anchored around a new or existing rail service.</p> <ul style="list-style-type: none"> • Suggest further exploiting the existing rail network – it is considered that a sympathetic new neighbourhood could be accommodated between Cheltenham and Gloucester that has the ability to provide strategic new services for both settlements such as a parkway railway station and a new hospital.
<p>Growing existing villages scenario</p>	<ul style="list-style-type: none"> • Across the SLP area there is a significant opportunity to sustainably grow a number of Service Villages in order for these to efficiently develop into Rural Service Centres, which in turn increase the sustainability and functionality of their immediate surroundings. • Suggest small scale development in rural villages. • Suggest a scenario called ‘Village clusters’ which differs from dispersed development. The logic of this approach is rooted in the NPPF which emphasises that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services and that where there are groups of smaller settlements, development in one village may support services in a village nearby. • Suggest small developments in rural villages proportionate to the scale and

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	<p>character of the village.</p> <ul style="list-style-type: none"> All other settlements should be considered for smaller levels of growth, where this has the collective ability to support shops, services and facilities within the immediate area.
Specific areas as a scenario	<ul style="list-style-type: none"> Suggest an out spill 'satellite settlement' for environment-constrained Cheltenham, extending North from Stoke Road (west of Bishops Cleeve) on flat land between the railway mainline and the A435.
Additional new town scenario	<ul style="list-style-type: none"> Consider alternative plans for growth in the future, such as a 'new town' somewhere in the Cheltenham, Tewkesbury, Gloucester area which will provide affordable housing, businesses and jobs. An expansion of the Garden Communities option could be considered to better enable a future self-contained sustainable development scenario, with more scope for the required infrastructure.
Landscape focused scenario	<ul style="list-style-type: none"> Recommend that consideration should be given to a scenario that doesn't involve: (i) major development within the CNL; or (ii) development within the CNL and / or its setting that would harm the natural beauty of the area. It is important to note that such a scenario

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	<p>doesn't necessarily mean that there should be no development within the CNL.</p> <ul style="list-style-type: none"> • Recommend that consideration should be given to a scenario that doesn't involve major development within the CNL or its setting that would harm the biodiversity or natural beauty of the area. • Suggest avoiding urban sprawl at motorway junctions and large-scale development that adversely affects the views and the setting of the CNL.
Heritage focused scenario	<ul style="list-style-type: none"> • Suggest a scenario that preserves the unique heritage of Cheltenham, Gloucester and Tewkesbury.
Flood mitigation scenario	<ul style="list-style-type: none"> • Consider a scenario that avoids major, repetitive flooding meaning many people need to live elsewhere, recommend development on hilly areas e.g. in Area of Outstanding Natural Beauty (AONB) areas. • Focus development in areas not at risk of flooding and along existing major road networks, with access to all the facilities required to live a good life, that doesn't affect village communities.
Low carbon scenario	<ul style="list-style-type: none"> • Suggest a lowest carbon budget scenario - estimate the carbon budgets of the 6 given scenarios and look for alternatives that have a lower budget

	than any of the 6.
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There were a number of responses received to this question that did not suggest alternative scenarios but wished to raise concerns about the scenarios in general.

One respondent was concerned that scenario 3 fails to consider a new pattern of growth derived from widespread remote/home working arrangements. They considered that this places far less pressure on residents needing to live within close proximity of traditional economic centres.

There was a comment relating to the emerging Local Nature Recovery Strategy (LNRS), suggesting that a mixture of all scenarios should be considered with the strategy in mind to determine the best areas for development whilst ensuring nature protection.

One respondent supported the existing strategy's settlement hierarchy emphasising that any spatial strategy should promote growth near existing settlements with access to planned infrastructure capable of supporting new housing. Whilst one respondent was very concerned about any development directed towards Tewkesbury given its population increase and vulnerability to flood risk.

Sustainable transport was highlighted as an essential aspect of all development scenarios, rather than it being a separate consideration. There was criticism that the SLP does not adequately address sustainable transport, particularly rail, and its role in reducing car dependency. There was further concern that the scenarios are not in accordance with the national Climate Change Emergency agenda.

The safeguarding of former railway routes, such as the Cheltenham-Honeybourne-Stratford line, was also urged to support future development, including potential park-and-ride facilities at Cheltenham Racecourse.

A focused approach to housing needs was recommended for rural areas with limited services. This includes identifying local needs and ensuring that future housing development is controlled to prevent unchecked expansion.

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A review of the Green Belt was seen as critical, particularly in assessing sustainable locations for growth in rural settlements. It was also stressed that the SLP should be developed through a comprehensive and evolving countywide plan to support sustainable growth while preserving the natural landscape. One respondent urged the SLP to ensure that any testing is based on a scenario where growth and investment that is already planned has been delivered.

One respondent considered that none of the scenarios presented in the Issues and Options consultation form an adequate basis for progressing the SLP. It was generally acknowledged that the scenarios are considered insufficient on their own, with concerns raised about the lack of potential for smaller development sites to contribute meaningfully to housing needs.

The preservation of the natural views from Crickley Hill and the Cotswold escarpment was emphasised, along with the importance of maintaining a green gap between settlements to protect the area's visual and environmental integrity.

In addition, there were many respondents that suggested that the SLP should consider a combination of all elements as the final strategy. It was considered that this would support the Government's objective of 'significantly boosting the supply of homes'.

Several respondents considered that the six development scenarios provide a comprehensive range of broad alternative spatial strategy options and that there are no further alternative development scenarios necessary to test. Conversely there was a comment that suggested that not all the scenarios individually would provide for sufficient development, even at the lower levels but that none are sufficiently different (or differentiated) to allow for any plausible additional scenarios.

28. Are the pros and cons identified for the six development scenarios a fair and accurate assessment?

88.6% of respondents provided no answer.

6.6% of respondents said 'No'.

4.6% of respondents said 'Yes'.

a. If not, which one(s) and what are your reasons?

The following table shows respondents suggestions for additional pros and cons in relation to each development scenario:

	Suggested Pros	Suggested Cons
Scenario 1	<ul style="list-style-type: none"> • Reduces development pressure on the CNL. • The sites that fall within urban concentration are likely to perform well from a sustainable transport perspective. • This would rejuvenate city centres and use some unused previously developed sites. • If done well could be heritage-led regeneration. • May ease sustainable transport and active travel within these quite confined zones. • This helps mitigate the effect of a decline in the viability of retail. 	<ul style="list-style-type: none"> • Concern that this scenario alone would not deliver sufficient new homes and jobs alone. • Would only provide a limited range of housing types. • Would likely result in harm to the setting and significance of important heritage assets. • Would present viability challenges - Brownfield redevelopment of sites is more expensive. • Potential loss of, and / or lack of provision of green infrastructure. • Would be likely to result in poor and overly dense forms of development. • There would be no associated opportunity to improve public access to the Green Belt, or to provide

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		<p>quality, publicly accessible, open space at scale.</p> <ul style="list-style-type: none"> • By focusing on urban concentration, the needs of rural communities would be completely overlooked. • The needs of Tewkesbury Borough would not be met by this scenario. • Does not help rural areas thrive and address the many economic and social issues which rural communities face.
Scenario 2	<ul style="list-style-type: none"> • Urban extensions could provide for jobs, services etc. • As a well-designed scheme would enable internalisation of trips. • Often provide a greater variety of homes to meet the local need. • Would include land without long-leases that would otherwise hamper development timeframes. • Development can be delivered close to 	<ul style="list-style-type: none"> • Don't agree journey lengths would be increased. • Potential urbanisation of the CNL • Adverse impacts on views from and to the CNL. • Difficult to provide good infrastructure, especially to provide good transport. • Urban extensions take away the green lung from existing communities, whilst not providing it for the new community. • Could potentially result in the coalescence of Cheltenham and

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	<p>where the need arises, reducing the likelihood of unnecessary travel into and out of the area.</p> <ul style="list-style-type: none"> • May deliver better spatial options. • Could enhance existing communities and associated Green Infrastructure (GI) with improved natural areas. • Only scenario that would deliver the minimum housing number prescribed as a starting point by the Standard Method in full. • Would mean public transport is more cost-effective, as these extensions can be easily supported from the centre. • May produce nicer places to live, with lower densities. • Opportunity to grow innovative strategic allocations to support 	<p>Gloucester, which, in turn, would have an adverse impact on views from the CNL.</p> <ul style="list-style-type: none"> • Potentially excessive increase in traffic movements within and along the boundary of the CNL. • Would be subject to inevitable delays and would provide for high densities, which would not necessarily be in keeping with the character of settlements. • Increased pollution and reduced air quality. • Note that some of the locations fall outside of the SLP area. • Loss of identity of village locations becoming part of the urban sprawl of adjacent cities and losing their rural appeal. • Would be a salami slicing approach which will ultimately destroy all the Green Belt. • Could not accommodate the majority of the likely residual development
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	<p>their long-term success.</p>	<p>requirement that needs to be identified.</p> <ul style="list-style-type: none"> • Long lead in time and the significant associated infrastructure that is involved with delivering urban extensions. • This scenario would result in the lack of development in the rural settlements resulting in local housing needs remaining unmet, which would in turn exacerbate existing demographic and affordability issues.
<p>Scenario 3</p>		<ul style="list-style-type: none"> • Current wording discredits the level of statutory protection that should also be afforded to the AONB. • Would not deliver sufficient new homes and jobs alone. • Would only provide for a limited range of housing types, sizes and tenures. • Would be inconsistent with NPPF objectives of boosting the supply of housing as well as the draft SLP Vision. • Will result in loss of valuable agricultural land.

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		<ul style="list-style-type: none">• Potential increased development pressure on the CNL and its setting.• Would be subject to inevitable delays and would provide for high densities, which would not necessarily be within keeping with the character of settlements.• Whilst Green Belt policy has been an effective planning tool, it is not an environmental designation per se.• Long lead in times is a constraint.• Planning so far has been short sighted and only focused on hitting the housing target without investing in infrastructure.• On its own, would not deliver significant new homes at Cheltenham where there is significant investment and growth already planned.• If sustainable travel becomes unattractive due to long journey times, this may result in an increased demand on the strategic road network (SRN) and a
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		<p>higher impact in terms of safety and capacity.</p> <ul style="list-style-type: none"> • This scenario would result in the lack of development in the rural settlements resulting in local housing needs remaining unmet, which would in turn exacerbate existing demographic and affordability issues.
Scenario 4	<ul style="list-style-type: none"> • Would reduce the need to build on Green Belt land. • Would enable the provision of a wide choice of housing sizes, types and tenures. 	<ul style="list-style-type: none"> • The costs for the delivery of new infrastructure can have significant impacts on overall viability. • Large schemes take a significant amount of time to develop masterplans and work through the planning and political frameworks. • Limited benefits for existing residents. • Overreliance could result in long-term harm to the SLP being able to adequately direct where development should be located. • The implications and risks of long lead-in times should not be underestimated.

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		<ul style="list-style-type: none">• Unlikely to provide for all of the new homes and jobs required.• Potential adverse impacts on views from the CNL.• The complexity of delivering sustainable transport infrastructure in areas where there is currently a lack of provision should be recognised.• The scenario will not assist urban regeneration or existing rural settlements.• This option only identifies land in the Tewkesbury Borough Council area and doesn't share the responsibility with Gloucester and Cheltenham.• Potential adverse impacts on downstream flood risk.• Potential adverse impacts on biodiversity and natural beauty.• Potential adverse impacts on dark skies.• Difficulties surrounding land assembly, which will have implications for masterplanning.
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		<ul style="list-style-type: none"> • Could result in impacts on the safe and efficient operation of the SRN and therefore may result in a need for improvements on the SRN. • This scenario would result in the lack of development in the rural settlements resulting in local housing needs remaining unmet, which would in turn exacerbate existing demographic and affordability issues.
Scenario 5	<ul style="list-style-type: none"> • Would help to support thriving communities by supporting shops services and facilities. • This would enlarge existing communities, making them more viable in some areas. • Advantage is that some village schools are at present not viable because of the lack of affordable housing in rural locations. 	<ul style="list-style-type: none"> • Would not be capable of delivering sufficient levels of development to meet the required targets alone. • Negative implications for existing settlements and their inhabitants. • Would not retain or enhance the character of much of the rural areas affected. • Does not help support town centres. • Destroys character of historical and often picturesque villages/hamlets.

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		<ul style="list-style-type: none"> • Excessive development pressure on the CNL. • Potential adverse effects on the natural beauty of the CNL. • Potentially excessive increase in traffic movements within and along the boundary of the CNL. • Unlikely to provide for the full housing need. • Would be over capacity for existing infrastructure and resources in some areas. • Potentially excessive increase in traffic movements. • Not enough focus on pre-requisites of utility/ transportation; flooding needs, which have to be in place before houses are built.
Scenario 6	<ul style="list-style-type: none"> • Emphasise the ability to be in close proximity to schools. • Would enable a significant proportion of, or all, housing and employment needs to 	<ul style="list-style-type: none"> • Potentially reducing the gap between Gloucester, Cheltenham and Bishop's Cleeve. • Could lead to longer journeys and focus development not only in the Green Belt but towards

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	<p>be met close to where they arise.</p> <ul style="list-style-type: none"> • Neighbouring districts could benefit from easy access to improved transport connections in and around the SLP area. • Prioritises housing and economic development in areas where travel choices can be maximised. • This option ticks the boxes for sustainability and reducing the carbon footprint. • Potential to provide enhancements such as an extra platform, a rail line realignment and increased services per hour in both directions. 	<p>more environmentally sensitive areas.</p> <ul style="list-style-type: none"> • Large parts of the borough are completely missed with this approach. • Fails to acknowledge the inertia that most people possess when it comes to adopting sustainable options such as public transport or cycling. • Would create continuous ribbon development which is a wholesale salami slicing of every part of the Green Belt ultimately leading to the destruction of the Green Belt purpose. • M5 Junction 10 and 9 would also face these sites and offer residents vehicular alternatives. This could result in a higher demand on the SRN in these areas. • This scenario would result in the lack of development in the rural settlements resulting in local housing needs remaining unmet, which would in turn exacerbate existing demographic and affordability issues.
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In addition, a number of general comments in relation to the development scenarios were made. Key points include a response concerning employment land suggesting that the SLP should specify employment land requirements and promote joint efforts with Stroud District Council for large-scale developments like Symmetry Park. Another comment was concerned about biodiversity and habitat fragmentation and emphasised the need for greater support for larger, connected ecological networks within the development scenarios.

In relation to scenario 1, there were general concerns about urban sprawl, the mix of housing types and the impact on heritage settings. There was however support for high-density housing in urban areas to reduce sprawl and improve public transport usage. There was also strong support for redeveloping brownfield sites, with several respondents noting that it does not necessarily harm heritage areas or hinder climate change mitigation if well-designed. It was stressed that new buildings should be designed to be more energy efficient than those they replace.

With regards to scenario 3, one respondent does not agree that it would not deliver sufficient new homes and jobs and believes that there is currently insufficient evidence to draw that conclusion. It was further considered that Scenario 3 could be adjusted to include strategic growth at other non Green Belt, non AONB locations within the Plan Area, suggesting this would result in a more balanced spatial strategy and a greater contribution towards growth needs.

In terms of scenario 4 it was recognised that while new settlements may not meet all housing and job needs, they provide opportunities for sustainable, planned growth. However, concerns around the limited impact on urban areas and potential landscape impacts were also raised in this scenario. It was also questioned whether any assessment of the new settlements providing more than 4,000 homes has been made. There was also concern that scenario 4 represents an unbalanced pros and cons list implying this scenario rules out others and includes several highly contentious arguments. It was suggested that the Tewkesbury Garden Community is better situated under Development Scenario 2 as an urban extension. One respondent considered that it is not accepted that in not providing all of the

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new homes and new jobs needed directly results in worsening housing unaffordability and constrained economic growth.

Scenario 5 was criticised for its unsustainable nature, with concerns over car dependency and limited rural services. The need for affordable housing in rural areas was acknowledged and it was suggested that this should be targeted where demand is high. One respondent considered that some of the cons in scenario 5 are highly contentious that could apply equally to other scenarios. Another respondent considered it unlikely that the character and setting of existing settlements will be harmed by development in more rural locations. It was further suggested that the respondent is not aware of any rural services or facilities which would experience undue pressure as a result of a small amount of additional housing in the vicinity. It was also highlighted that the argument that this scenario increases reliance on the car is ignoring the fact that even in urban areas buses drive around empty of passengers and everyone relies on a car to shop, work, attend appointments. Another respondent suggested that the cons state that it would be unlikely to provide for the full amount of new homes needed and considers this should be removed as the consultation document clearly states that no one single scenario will deliver all the growth.

There was support for scenario 6 in enhancing public transport links and integrating development with existing transport infrastructure, such as in the Tewkesbury Garden Community. Emphasis was placed on integrating development with public transport networks to reduce car dependency and improve sustainability. There was also a concern about why it is not clear the Sustainable Transport Corridor does not extend to Tewkesbury. It was suggested that Tewkesbury Garden Community should be referenced under this scenario, given that it would benefit from a sustainable location on the rail network. It was also considered that within scenario 6 the pros and cons are very unbalanced, and many are very contentious, giving the impression of pre-determined preferences and arguments being made rather than views being genuinely consulted on. There was also concern that scenario 6 mentions the Local Transport Plan which is now way out of date, and it was questioned how the SLP can gain ground if there appears to be little consultation between all parties.

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There was a call for testing the viability of each scenario in terms of housing delivery, including the mix and affordability of homes.

It was considered that there does not appear to be a scenario which directs growth to locations which have access to a base level of facilities.

It was requested that a clearer, more consistent criteria for evaluating development scenarios is provided. A suggestion for this was for greater cross-reference from the pros and cons to the proposed Strategic Objectives, the Sustainability Appraisal transport criteria and the Sustainable Transport Strategy Broad Site Assessment criteria.

It was highlighted that the pros and cons for green space, GI and biodiversity look a bit slim and that there could be a mixture of scenarios based on the best place for new houses/ nature recovery.

There was a consideration that, the SLP should invest in those parts of the Green Belt to build what is required. It was suggested this be undertaken simultaneously with converting the remaining Green Belt into natural flood measures to manage flood risk and increase biodiversity.

It was recommended that, to ensure public transport is a credible choice in the preparation of the spatial strategy, the public transport network (defined by regular bus routes and main rail stations) should be considered to represent a key “fix” for the plan, to which development needs to be directed.

It was considered that the options should recognise the agreed contribution that Mitton, as a strategic site outside the SLP area, will make towards the needs of Tewkesbury Borough Council (500 homes).

Finally, there was a concern about why scenarios focus on supporting thriving communities and a suggestion that the SLP emphasis should be on communities that aren't thriving.

29. Which of the development scenarios, or combination of them, do you consider the most appropriate for the Strategic and Local Plan?

3.25% Provided no answer (13 votes)

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23.05%	Scenario 1: Urban Concentration (92 votes).
15.78%	Scenario 2: Urban Extensions (63 votes).
16.79%	Scenario 3: Urban Extension, Avoiding the Green Belt (67 votes).
11.27%	Scenario 4: New Strategic Settlement (45 votes).
10.02%	Scenario 5: Rural Dispersal (40 votes).
19.79%	Scenario 6: Sustainable Transport (79 votes).

(Note that some respondents voted for more than one scenario within their response to this question).

30. Are there any places not currently identified in the rural settlement hierarchy, which could/should be included?

86% of respondents provided no answer.

10% of respondents said 'No'.

4% of respondents said 'Yes'.

a. If answered yes, please specify.

The following locations and suggestions were proposed in response to any places not currently identified in the settlement hierarchy that could be included:

- Within Areas of Outstanding Natural beauty
- Ascot house farm
- Ashleworth
- Twigworth
- Suggest the 'Hub and Spoke' model
- Shurdington
- Small scale village development
- Gotherington
- Churchdown
- Innsworth
- Twyning

- Village Clusters
- Newent
- Duty to cooperate with the Cotswolds
- The M5 corridor
- Individual or small clusters of house plots, including “tiny homes”
- Land either side of the A40 between Gloucester and Cheltenham
- To the west of A38 south of Tewkesbury
- Around J10 M5 redevelopment
- Around J11 M5 and towards J11A M5
- North of A4019 between A38 and M5
- Fiddington
- Bishops Cleeve should be upgraded to Market Town
- On rural settlements – ask all the communities and villages.
- Rural settlements - albeit limited quantum of total potential but should be where they are wanted, and not imposed.

Conclusions and Next Steps

31. Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

The majority of responses received to this question related to sites or expanded on the preceding questions and these will be considered within the relevant sections of the questionnaire. Below is a summary of other key points made:

Housing & Development:

- More affordable housing, including bungalows for the elderly and accommodation for disabled people.
- Focus on developing brownfield sites first and avoiding rural sprawl by preserving Green Belt and agricultural land.
- Development should be proportional to infrastructure capacity (e.g., healthcare, education, sewage systems).

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- There is concern that the planned housing figures are too high and should be reassessed.
- Would like the new Local Plan to recognise the role of Housing Associations in providing affordable housing in Cheltenham, Gloucester and Tewkesbury.
- The needs of the homeless need to be considered.
- Development should not proceed until the necessary infrastructure (roads, services) are in place.
- The SLP should consider amphibious housing and offices to mitigate against flood risk.
- Strongly feel that instead of asking opportunistic landowners to put land forward you need to start by identifying the areas that can take development according to their existing or planned transport links and the job opportunities that can be created in those areas.
- Suggest the SLP need to fully evidence the real world contribution to future development needs from brownfield land to avoid the risk of setting unrealistic delivery goals for delivery on previously developed land.

Infrastructure & Transport:

- Improved transport links, especially between urban and rural areas, are essential.
- Support for reopening railway stations and enhancing public transport (buses, cycling, walking) is needed.
- Should be a strong emphasis on sustainable transport options like electric and hydrogen-powered vehicles.
- The National Cycle Network is an important local asset for walking and cycling infrastructure.
- A better connection into Tewkesbury than is currently available from Ashchurch station should be examined.

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- The Transport evidence pertains only to buses, cycling and walking, but lacks any contribution from County Council Highways towards specifying the road infrastructure needed for tens of thousands of houses.
- Concerns about the adequacy of road infrastructure to cope with future housing developments.
- SLP should take into account future infrastructure needs (e.g., A46 realignment).
- Need for more cemeteries and memorial spaces – these should be provided on higher ground.
- The outstanding services and infrastructure requirements from the original plan need to be delivered for communities prior to considering future urban extension options.

Environmental Concerns:

- Protect wildlife areas, green spaces and natural landscapes.
- Support for biodiversity net gain and nature recovery strategies.
- Water quality and efficient use of water resources must be prioritised.
- Preservation of Green Belt land and avoiding its erosion should be a priority.
- Emphasis on addressing the climate and ecological crises together.

Consultation & Community Engagement:

- The consultation process was seen as complicated and poorly advertised, limiting public awareness.
- Suggest a more inclusive approach to planning that considers the needs of existing communities.
- Recognition of the importance of NHS services, with suggestions to embed healthcare needs into the plan.

Planning & Strategy:

- A call for a clear, long-term vision for housing, with an end state where no further development is needed.
- Strong collaboration among councils, developers, and environmental organisations is crucial.
- The plan should take into account local needs for Gypsies and Travellers and address any infrastructure gaps.
- Recommendations to assess flood risks, water management and pollution controls during development.

Other Issues:

- Support for the expansion of Gloucestershire Airport for economic growth and job creation.
- A focus on monitoring and adapting the plan over time.
- Suggest thinking more strategically in respect of providing high-quality, accessible, sport, activity and recreation opportunities to all residents.
- Inclusion of policies for affordable housing and park homes.
- Concerns that the plan should not be developer-driven but rather focus on a balanced, strategic approach.
- The land around Gloucestershire airport should be preserved on the basis of aviation safety for emergency landings and noise mitigation.
- The strategic plan could be a blueprint for other areas – if we do something radical and progressive like Transport hubs, autonomous electric and hydrogen powered vehicles, energy sources for the same for transport of people and goods.
- Noting the intention to submit the SLP to the Secretary of State for examination in 2026, suggest that it may be prudent to ensure that there is sufficient time in the plan period from the outset to account for any slippage in these timescales.

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- It needs to be carefully considered that the population might not rise at the rate currently being planned for.
- Promote a Heritage Impact Assessment of all potential site allocations as a step between the Housing and Employment Land Availability Assessment (HELAA) and the selection of site allocations for inclusion in the plan and the drafting of associated policies.
- Note absence of any supporting study and mapping for where the green/ blue infrastructure should go.
- It is very important to look at the whole plan with an eye to accelerated decarbonisation.
- Monitoring of the Plan is critical for a number of reasons and in terms of the review of the plan.

5. What happens next?







- 5.1. Now that the consultation on Issues and Options has concluded, the feedback provided will be reviewed and used to shape the next stage of the SLP. The nature of Regulation 18 is that engagement will be ongoing with key service providers and other stakeholders. If you would like to be involved in the next stage of the process please join the planning policy database [here](#).

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Appendix 1 – Screenshots of ‘project’ windows from consultation software

<https://strategiclocalplan.govocal.com/en-GB/>

 <p>Draft Vision and Strategic Objectives</p> <p>View and comment on the draft Vision and Strategic Objectives.</p> <hr/> 	 <p>Climate and Nature Recovery</p> <p>Tell us your views about how the SLP should address climate change and nature recovery.</p> <hr/> 	 <p>Planning for community and business</p> <p>This project folder explores what the housing policies in the SLP could look like to help to deliver the right homes in the places where they are needed.</p> <hr/> 
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5



Hearing from young people

If you are aged 13-25 we really want to hear your views.



2



Strategic and Local Plan Regulation 18 Documents

In this project folder you can view the Regulation 18 consultation document in full and comment directly on a PDF version. You can also answer the full set of questions.



9



Scenarios

Take a look at some options for how new homes and jobs could be spread across the three council areas. Let us know what you think of each of them and which ones work better than others.



2







Additional Comments and Feedback

Is there anything else you would like to tell us?



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<p style="text-align: right;">Learn more</p>  <p>Infrastructure</p> <p>Answer a survey about the provision of infrastructure required to support the level of growth proposed.</p> <hr/> <p> +20</p>	<p style="text-align: right;">Learn more</p>  <p>Type, size or tenure of new homes</p> <p>Tell us about the housing you or your community needs.</p> <hr/> <p> +22</p>
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[Share](#)

Planning for community and business


A key part of good planning is ensuring that those who live in the area now, as well as those who may live in the area in the future, have a home that meets their needs. Whether that be an older household wishing to downsize; a young professional wishing to move out of their parents' home; or a growing family needing more space.

This project folder explores what the housing policies in the SLP could look like to help to deliver the right homes in the places where they are needed.

To read the "Issues and Options Consultation: Spatial Options and Key Policy Areas" document in full click [here](#).


<p style="text-align: right;">Learn more</p>  <p>Jobs and the Economy</p> <p>Tell us your ideas on how the SLP will establish the right level of employment growth and ensure the right type of employment land is provided.</p> <hr/>	<p style="text-align: right;">Learn more</p>  <p>Retail and City/Town Centres</p> <p>Tell us your ideas on how the SLP can improve, adapt, encourage and protect out city, town, and neighbourhood centres.</p> <hr/>
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Learn more




Traveller communities

Answer a survey to let us know how you think the SLP should plan for traveller communities.




Learn more



How many new homes?

How many new homes should the SLP plan for? Read the provided information and take the survey to let us know your views.





Climate and Nature Recovery


In this project folder you will find a map where you can help us identify any land that could be used for environmental purposes, such as wildlife / biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production.

You will also be able to submit your ideas about how the SLP can address climate change and nature recovery.

You can also read the Renewable Energy Study. This is a piece of emerging evidence base to support future policy development.


To read the "Issues and Options Consultation: Spatial Options and Key Policy Areas" document in full click [here](#).

Learn more




Tell us about locations for climate and nature recovery

Let us know of any locations you think are suitable for climate and nature recovery.




Learn more



What should the SLP do for climate and nature?


Tell us how the SLP could effectively address climate change and nature recovery?



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[Learn more](#)




Renewable Energy Study

Read the Phase 1 Renewable Energy Study.




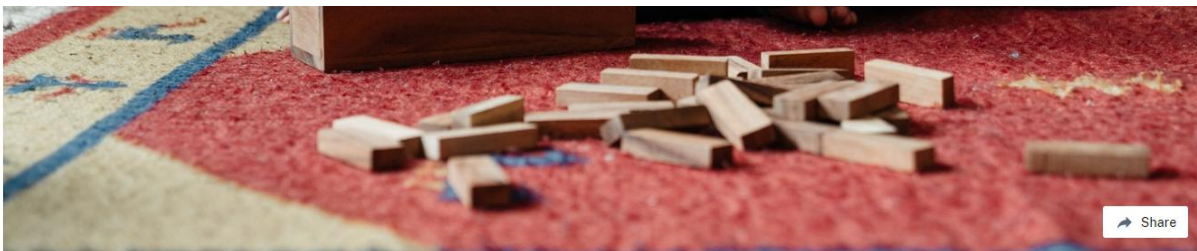
[Learn more](#)



Renewable Energy Poll

Should we allocate land for renewables?





Draft Vision and Strategic Objectives


The SLP needs to provide a positive Vision for the development of the area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

The Vision should be supported by Strategic Objectives, which set out the key ways that it will be delivered. The Vision and Strategic Objectives provide the foundation on which the plan's strategy and policies are then based. A Vision should be bold and ambitious, but realistic, and set the approach for at least the next 15 years.

In this folder you can view the Draft Vision and Strategic Objective as well as let us know if you agree, disagree, or have other ideas you would like to share.


To read the "Issues and Options Consultation: Spatial Options and Key Policy Areas" document in full click [here](#).

[Learn more](#)




Draft Vision

Read the Draft Vision, comment on the council's ideas, and tell us your own.




[Learn more](#)



Strategic Objectives

Read the Strategic Objectives, comment on the council's ideas, and tell us your own.



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Strategic and Local Plan Regulation 18 Documents

Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are working together to create a plan for new homes, jobs, and infrastructure that meets the needs of local people whilst protecting the climate and nature. We want to hear from you.

In this folder you can view the Regulation 18 document "Issues and Options Consultation: Spatial Options and Key Policy Areas" and directly comment on a PDF version of the document.

There is also a questionnaire containing all of the questions from the document that are spread across this platform.

Learn more

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Cheltenham, Gloucester & Tewkesbury

Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan

Issues and Options Consultation: Spatial options and key policy areas

December 2023

Regulation 18 Document

Directly comment on a PDF version of the consultation document.

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Learn more

Consultation Document Questionnaire

Answer a questionnaire containing all of the questions from the document.

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