

Appendix 2: Summary of Regulation 18 comments and changes to Vision and Objectives

Themed Comments	CHANGE PROMPTED BY REGULATION 18 RESPONSES
<i>Timing of Vision</i>	
<p>A number of comments were received concerning the time frame for the vision and objectives suggesting that the date should be extended to at least 2046 (and beyond). This was due to the life of the plan and rapidly changing environment in terms of technology, demographic changes and political, socioeconomic and environmental challenges that the area will face.</p>	<p>The vision has been extended to 2050 to enable any strategic allocations to be included and to tie in with the government's climate change agenda to achieve its net zero carbon target by this date.</p>
<p>It was suggested that the vision end date should be amended accordingly if there is any delay in the adoption date of the SLP. There was a suggestion that there should be shorter delivery timeframes incorporated for specific housing elements within the plan and that the strategy could look at long-term, mid-term and short-term objectives that could be revised with each revision of the SLP at each examination</p>	
<p>There was a suggestion to looking forward a minimum of 30 years for strategic policies in line with the 2023 version of the NPPF (para 22).</p>	
<i>Sustainable Transport / Active Travel / Public Transport</i>	
<p>There were many comments received concerning the issue of sustainable modes of transport provision. Some</p>	<p>The vision and objectives have been amended to strengthen the SLP focus on creating the</p>

<p>respondents suggested that the vision needs to be strengthened to show ambition for the area to create the conditions to enable residents to use active travel routes to access all necessary services and facilities. It was considered this would also allow a move to significantly less reliance on the motor car which also helps towards moving to a low carbon future.</p>	<p>conditions to enable residents to use active travel routes to access all necessary services and facilities and to move to significantly less reliance on the motor car.</p> <p>Reference to 'active environments' is incorporated into the wording.</p>
<p>It was suggested that the vision needs to strengthen its support for the delivery and expansion of public transport provision, stressing that the focus of the plan should be on 'high quality public transport corridors'. It was considered that there should be a major upgrade of existing train and bus services that service the local business parks, to enable local employees to use public transport to access work.</p>	<p>A stronger commitment within the vision to improving and facilitating public transport provision to assist this agenda.</p>
<p>It was considered that the vision is broadly comprehensive but fails to properly direct the plan strategy where the pressing need to secure a more sustainable balance of travel choices by sustainable modes is concerned, and public transport in particular.</p>	<p>The wording has been amended to highlight that the chosen development strategy ensures new development is located where sustainable transport infrastructure can be best utilised.</p>
<p>There were suggestions as to how the vision could be rewritten with emphasis on the spatial strategy in terms of locations for new development to be directed towards settlements that have the sustainable infrastructure readily in place and that active travel routes will help to identify and create suitable locations of local growth. It was considered that this could help to centre</p>	

sustainable transport from a conceptual perspective. In this vein it was suggested that new developments be located where sustainable transport infrastructure can be best utilised, i.e. locations the subject of recent major highway/cycle/pedestrian improvements that will provide links to existing services and facilities, through a range of transport modes.

It was stressed that there should be a recognition of the delivery of 'safety' within the transport element of the vision. Furthermore, it was considered that public footpaths and cycleways should be specifically mentioned

There were mixed responses concerning the 15/20 minute city concept and concern that rapid transport routes would get clogged up with motor traffic.

It was suggested to use the Sport England and Government phrase 'active environments' within the vision when discussing the promotion of active travel, walkable neighbourhoods and interconnected green spaces.

Climate Change

There was a consensus among respondents that there should be greater ambition on our decarbonisation aspirations, suggesting that we should aim to return to 1990 levels of carbon emissions and flood risk or aim to achieve net zero. It was suggested to include a requirement to provide mitigation through an offsetting fund if net zero can exceptionally not be

*The vision has been altered to include reference to **nature recovery** aligning more with the **climate change aspects** of the vision.*

Short / mid / long term objectives are incorporated to ensure that the vision has

<p>achieved on a development site.</p>	<p><i>measurable outcomes and milestones for climate change.</i></p>
<p>There was general support for growth that aligns with decarbonisation efforts, aiming to reduce reliance on fossil fuels and striving for zero and low carbon emissions.</p>	<p><i>The vision and objectives more clearly reflect the contribution that the plan area will have made within climate change objectives in terms of mitigation through renewable energy, mass public transit, nature recovery etc.</i></p>
<p>It was considered that more widespread use of 'nature-based' solutions to climate change is needed, a holistic approach above that of natural flood management techniques. It was also suggested that 'nature recovery' is embedded into the climate change aspect of the vision.</p>	
<p>It was suggested to add reference to the need for housing etc. to be highly efficient in terms of carbon emissions and that any major urban housing schemes should be incentivised to install district heating solutions. There were also comments suggesting that the vision should state that the existing stock of housing, community buildings etc. will have been upgraded to meet net zero standards.</p>	
<p>It was highlighted that development built over the lifetime of the SLP will be the most sustainable built in the area to date and that it should be emphasised that this growth will have a great contribution to make in delivering the transition to a low carbon future.</p>	
<p>There was concern that growth and population increase is not compatible with net zero, biodiversity or protecting natural habitats. It was considered that the policies are guilty of 'Green Washing'. There was acknowledgement that you can mitigate the impact, but</p>	

<p>development on green field sites will be to the detriment of the environment.</p>	
<p>It was emphasised that the benefits of significant tree planting to mitigate against climate change should be included within the vision and that the aim to promote re-use / recycling should also be included within the objectives. It was also suggested to include the aim of installing public electric vehicle (EV) charges in every village.</p>	
<p>There was general support for the concept of 'Green Growth', focused on carbon reduction and addressing the causes and impacts of climate change, although it was suggested this should apply to all sizes of development.</p>	
<p>It was stressed that the vision should clearly reflect the contribution the area will have made to climate change mitigation. This included reference to a huge increase in local renewable energy and the planning of new mass public transit etc. In addition, it was considered it should include reference to a substantial and measurable recovery in the natural environment with increased biodiversity, strengthened ecological networks and better protected green and blue infrastructure.</p>	
Infrastructure	
<p>It was considered that the vision needs to detail infrastructure needs associated with each development scenario and that it must be made clearer that infrastructure improvements need to come before development, including</p>	<p><i>Reference is made to reflect the full suite of infrastructure provision required over the plan period and to achieve this the vision now refers to the Infrastructure Delivery Plan</i></p>

<p>highlighting known ongoing infrastructure investment. There was a suggestion for the inclusion of a clear infrastructure plan outlining necessary upgrades and timelines.</p>	<p><i>(IDP) that is being prepared.</i></p>
<p>It was further suggested that reference to the definition of infrastructure set out in the Levelling up and Regeneration Act 2023 be included in the vision.</p>	
<p>It was also highlighted that reference to education and research should be included in the vision and that education is not covered sufficiently, suggesting that the aim of improving the quality of education should be included with monitoring of results. It was further highlighted that hospital provision should also be adequately factored in.</p>	
<p>There was concern expressed about the closure of community facilities when the vision wishes to see community facilities built to support growth.</p>	
<p><i>Emergency Services Infrastructure / Public Safety</i></p>	
<p>It was highlighted that the list of infrastructure to support development is not exhaustive and it should include emergency services and rescue infrastructure.</p>	<p>Reference is made to reflect <i>the full suite of infrastructure provision required</i> over the plan period and to achieve this the vision now refers to the <i>Infrastructure Delivery Plan</i> <i>(IDP) that is being prepared.</i></p>
<p>There were concerns that public safety (road speed enforcement, vandalism, crime) should be included within the plan with an objective added of reducing crime/making the area safer for its residents.</p>	<p>More reference to <i>community safety</i> is incorporated to help ensure that the area is safe for all residents going forward.</p>
<p><i>Rail Network</i></p>	

<p>Several respondents considered that much more emphasis is required on the use of the rail network in Gloucestershire rather than depending on the M5. There was a further suggestion that there should be an objective that old railway lines should be reopened.</p>	<p><i>The vision and objectives have been amended to strengthen the SLP focus on creating the conditions to enable residents to use active travel routes to access all necessary services and facilities and to move to significantly less reliance on the motor car.</i></p>
<p>It was also mentioned that there should be transfer of road freight to the railway network of the armoured vehicles from Ministry of Defence, Ashchurch.</p>	<p><i>Reference to 'active environments' is also incorporated into the wording.</i></p>
<p>It was also suggested that Park and Ride facilities need to be considered for Tewkesbury, particularly in light of the Ashchurch development.</p>	<p><i>There is now a stronger commitment within the vision to improving and facilitating public transport provision to assist this agenda.</i></p>
<p>In terms of public transport considerations – it was considered that development should be promoted in areas with good rail connectivity in particular, and that the potential for new and improved station and train facilities should be reflected in the vision.</p>	<p><i>The wording has been amended to highlight that the chosen development strategy ensures new development is located where sustainable transport infrastructure can be best utilised.</i></p>
<p>Capacity / Density</p>	
<p>It was suggested that there should be a much more sensitive settlement by settlement analysis of capacity (the amount of land available for development) and opportunities for coherent place-making. There was also general support for incorporating greater</p>	<p><i>The vision reflects the evidence in terms of utilising the best use of land by including a requirement to 'ensuring optimum densities'.</i></p>

<p>emphasis on flexibility in housing types, densities, and design approaches.</p>	
<p>It was also suggested that the vision needs to be clear that building at higher densities, and where appropriate, greater height is required to meet housing needs in a sustainable manner. It was stressed that the SLP will need to recognise that there will be a possible tension between policies that seek to maximise housing density and policies that seek to meet the full range of housing needed.</p>	
<h3>Sports and Recreation</h3>	
<p>It was considered that the list of infrastructure requirements should include reference to sport, play and recreation provision and that current references within the vision appears to relate to existing facilities and not the provision of new. There was also concern raised that there will not be sufficient capacity to serve the projected population and that some of the existing provision is aged and environmentally inefficient.</p>	<p>Reference is made to reflect the full suite of infrastructure provision required over the plan period and to achieve this the vision now refers to the Infrastructure Delivery Plan (IDP) that is being prepared.</p>
<p>It was suggested that there should be a proactive approach to identifying and safeguarding sport and activity hubs/centres within all new strategic development, including both indoor and outdoor facilities for community sport and activity.</p>	

<p>It was considered that it should be made clear that growth can unlock new opportunities for healthy lifestyles and inclusive access to sport and recreation.</p>	
<i>Greenfield Land Development</i>	
<p>There was a suggestion that land between villages should be exempt from providing development and another that minimum separation distances between villages should exist.</p>	<p><i>There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.</i></p>
<p>It was considered that 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.</p>	
<p>There is concern that the vision, while highlighting the benefits of brownfield development, does not refer to the need to consider the advantages of well managed and sustainable development on appropriate greenfield locations. It was further suggested that larger scale greenfield sites can offer the most sustainable opportunities to deliver on the vision, tackling previous unsustainable development patterns across the three districts.</p>	
<p>There is concern that you cannot build housing and retain the natural environment in the same area. It was further considered that aspects of the vision are not appropriate for some semi-rural areas and are more relevant to</p>	

<p>established urban areas.</p>	
<p>It was suggested that the vision should set out sustainability criteria to provide the basis for a sustainable location-based plan for the provision of the identified housing need. It was further stressed that the vision should be more spatially focused and locationally specific with particular outcomes sought for each key location.</p>	
<p>It was considered important that for the plan to be resilient and flexible the vision should support the development of brownfield and greenfield land in equal measure alongside the delivery of large-scale new developments and proportionate development at settlements across the SLP area.</p>	
<p>It was noted that development within the confines of the established tightly drawn settlement boundaries has already been maximised, evidenced by development being approved on edge of settlement sites.</p>	
<p>It was stressed that the vision should acknowledge that the location of growth areas be most appropriately located where people can live, work and access the countryside, and all such factors should be considered together.</p>	
<p><i>Spatial Strategy</i></p>	
<p>There was concern that the vision focusses on large scale development and is too urban focused and that this would rule out small scale rural dispersal. There was concern that limiting housing</p>	<p>There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.</p>

<p>development to brownfield land and large-scale new developments would result in settlements stagnating and the closure of services and facilities if they cannot be sustained by the resident population.</p>	<p><i>The vision has been strengthened to include reference to meeting housing needs in full to include the gypsy, traveller and travelling showperson community, other specialised needs and those wishing to build their own homes (self and custom build homes).</i></p>
<p>It was considered that while the protection of farmland and valuable green spaces is offered as the justification for the focus on brownfield sites, those brownfield sites in urban areas cannot be placed at the centre of the vision if its wider and better objectives are to be realised.</p>	
<p>There was concern that the plan runs the significant risk of failing to be positively prepared (in accordance with the NPPF) and would have substantive negative impacts on the prospects of successfully delivering the Plan vision. This is because the respondent considers that it needs to embrace all sustainable development opportunities that are presented within the plan period.</p>	
<p>It was suggested that the vision sets specific ambitious housing targets to ensure the objectives are measurable and that a higher target is both achievable and necessary to address the area's full housing needs.</p>	
<p>There was concern that valuable green spaces and farmland must be preserved. One respondent also suggested that if development is essential then it should be away from existing areas.</p>	
<p>It was noted that whilst in due course there may be the opportunity to embrace a more meaningful and effective spatial</p>	

<p>strategy within the vision, this is not the case yet.</p>	
<p>It was suggested that that the garden community at Ashchurch, Tewkesbury must be prioritised over other greenfield proposals with less potential for sustainable transport. It was also suggested that now is the time for a major attractive new settlement with state-of-the-art infrastructure with spare capacity for future growth to meet all housing needs.</p>	
<p>Conversely it was considered by a respondent that new settlements are a high-risk delivery strategy and present many hurdles to the achievement of the local plan. It was therefore suggested that existing settlements should be prioritised for growth, utilising existing infrastructure and minimising delays to housing delivery.</p>	
<p>There was concern that the vision focuses on large scale developments and growth, that this is reinforcing unpopular urban extensions which in practice have delivered car-centred housing estates without any local or community facilities. It was separately considered that growth as an overarching objective is not sustainable and sends the wrong message about the purpose of a local plan which should be about the wellbeing and quality of life of its current and future inhabitants within a sustainable environment and a new, decentralised and sustainable model of prosperity.</p>	
<p>It was highlighted that Gloucester and</p>	

<p>Tewkesbury have sufficient traveller locations and Cheltenham has none, so there is a suggestion to level up 20 more sites in Cheltenham.</p>	
<p>There was concern about the assumption that there will be focus on “large-scale development” in “sustainable locations” referred to in the vision. It was suggested that this should be replaced with a commitment to “human-scale environmentally friendly development”. It was considered that this should entail meeting identified needs, utilising the existing built-up area better and prioritising dispersed smaller, human-scale development.</p>	
<p>There was suggestion to build on Gloucestershire Airport – that young people need homes not airports.</p>	
<p>It was frequently stressed that there are insufficient sources of brownfield land in the SLP area to make the requirements for new homes.</p>	
<p>It was suggested that a standardised range of houses whereby the facade can be changed but the remainder is standardised to improve quality, environmental rating, speed of construction and reduce cost significantly should be introduced.</p>	
<p>It was stressed that the commitments to the use of brownfield sites and improvement of town and city centres should be retained. It was suggested that the vision should be amended to ensure that where large-scale development has taken place, it will have delivered accessible local community</p>	

<p>facilities, have met the highest possible environmental standards – this would include net zero carbon impact and significant nature biodiversity net gain on site.</p>	
<p>It was noted that the Issues and Options consultation offered six scenarios or options to inform the spatial strategy and that the LPAs noted that the ultimate strategy will depend on a broadly based combination of options. It is considered that this is not addressed in the vision which focusses on brownfield opportunities.</p>	
<p>There was concern that the presumption in favour of development effectively means that all the strategic objectives are compromised from the outset because its developer led and not plan led.</p>	
<p>It was suggested that the vision ought to include smaller scale extensions to existing settlements rather than just large-scale extensions, suggesting that between 10 and 250 dwellings on the edge of settlements can provide a significant source of additional land for growth and contribute towards meeting needs. Furthermore, it was considered that there are numerous locations where this level of growth can contribute towards sustainable development patterns particularly where they are well placed in terms of existing public transport routes and in close proximity to existing facilities</p>	
<p>It was suggested that as the amount of growth is crucial, modelling for different</p>	

<p>amounts of population growth should be undertaken.</p>	
<p>It was stressed that there should be specific acknowledgement of the role played by Gloucester and Cheltenham as major urban hubs, with a wider catchment than just the SLP area.</p>	
<p>It was emphasised that Stroud District's own Vision to 2040 references the district's "network of market towns, well connected to their rural hinterlands and complementary to the role of wider regional centres" – which should be taken to include both Gloucester and Cheltenham.</p>	
<p>The comments above further highlight that the vision should be flexible in order that a meaningful and effective spatial strategy can be reflected within the vision when it is established. As stated previously, the optimum development strategy may require the inclusion of some elements of sustainable development on greenfield sites where the infrastructure provision can also be facilitated.</p>	
<h3>Housing / Employment / Other Needs</h3>	
<p>It was considered that the vision focusses on meeting housing needs, but similar emphasis needs to be placed on meeting people's employment needs. Many respondents agreed that the vision should state that all identified needs will be met in full – employment, Gypsy and Traveller, leisure, education etc. It was also considered that more place of worship should be included in the plan to</p>	<p>There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.</p> <p><i>The vision has been strengthened to include reference to meeting housing needs in full to include the</i></p>

<p>ensure the growing population have these needs met.</p>	<p><i>gypsy, traveller and travelling showperson community, other specialised needs and those wishing to build their own homes (self and custom build homes).</i></p>
<p>It was strongly suggested that it is appropriate for the LPAs to identify housing, and the maintenance of the five-year supply as an objective for the Plan. Furthermore, it was considered that meeting housing need in full should also be a key objective of the Plan.</p>	
<p>One respondent highlighted the recruitment and retention problems experienced by Gloucestershire Royal Hospital and the wider health and care sectors and suggested that there should be a strategy to provide a significant number of homes for key workers.</p>	
<p>It was suggested that the vision for meeting housing need should be more aspirational and that there should be a firm presumption in favour of sustainable housing development, reflecting that of the NPPF. It was further stressed that, in particular, there should be a firm objective to deliver more housing to meet the most pressing needs, particularly smaller homes, affordable housing and housing for older people. It was considered that the SLP should seek a step change in housing delivery.</p>	
<p>It was considered that the SLP should identify specific local rural need versus borough city wide housing need.</p>	
<p>There was a suggestion that the plan should encourage more community-led (not-for-profit) development – such as co-housing, or group self-build schemes. It was further considered that it is a way of speeding up the delivery of new</p>	

<p>housing as it generates a wider range of properties.</p>	
<p>It was highlighted that there needs to be a balance struck between established communities, where people come to live and stay forever and other housing stock which can provide short term affordable accommodation for a younger and potentially mobile workforce.</p>	
<p>There was a suggestion that it may be appropriate to be more explicit on how all the accommodation issues surrounding an ageing population will be achieved over the next 5-15 years. Furthermore, it was suggested that there is a need to mention the various types of accommodation and the need to strive to ensure independent living with easy access and support of local health and other services required by older people. Additionally, there was a suggestion that reference to the provision of more intergenerational homes on large development sites, in particular, should be made.</p>	
<p>It was stressed that the plan will need to deliver a range of housing sites providing a range of housing types, sizes and tenures.</p>	
<p>There was concern that "meeting needs" conveys little vision, or aspiration, contrasting with the wider ambition expressed in relation to other strategic topics and, underestimating and undermining the role of new homes in achieving such ambition(s).</p>	
<p>There was comment that our natural population will begin to decline from next</p>	

<p>year and that this will lead to a surplus of housing and/or the wrong type of housing.</p>	
<p>A number of respondents made suggestions to specific sites that could help deliver the housing needs set out in the vision.</p>	
<p>It was considered that more weight needs to be given to Neighbourhood Development Plans (NDP) and that the 5-year land supply should not trump NDPs.</p>	
<p>There was a suggestion that the vision should reflect the importance of meeting the needs of more vulnerable residents including those with disabilities, or residents who are otherwise disadvantaged by the housing market. It was further considered that from a housing perspective, meeting identified housing needs and addressing affordability issues, especially for rented homes for households in the greatest need of accommodation, should always be a priority.</p>	
<p>It was suggested that the provision of specialist homes should be driven by need, and be reflective of local affordability, rather than being driven by speculative proposals. It was further stressed that the vision should reflect that the provision and specification of specialist housing should be agreed in consultation with commissioners.</p>	
<p>It was highlighted that ensuring the 'highest possible quality of life for all' can only be equitably and realistically achieved if housing, infrastructure, transport and public services are</p>	

<p>designed to meet the needs of the ageing population, with an increasing incidence of households requiring wheelchair accessible and level access homes respectively.</p>	
Scope of Vision	
<p>There was a concern that the vision is far too focused on the needs and wants of people and the respondent considers that people are simply part of a wider ecosystem and the SLP must pay due attention to that. It was suggested that the focus needs to place the environment at the centre of any policy and there is insufficient detail in the vision on aspects such as nature recovery.</p>	<p><i>The vision has been altered to include reference to nature recovery, aligning with the climate change aspects of the vision.</i></p>
<p>There were a number of respondents who were unsure what 'Green Growth' referred to and suggested it was 'green washing'. It was further suggested that Green Growth should be defined in the glossary using the Organisation for Economic Co-operation and Development (OECD) definition. It was also noted that the first paragraph of the vision seems only to apply to larger scale developments, and it was suggested that harnessing the opportunities for green growth etc. should apply throughout the plan area with inclusion of how further growth can be 'green' and appropriately managed and mitigated.</p>	<p><i>The vision now includes an individual section for each council area to recognise and appreciate their distinct character and challenges.</i></p> <p><i>The wording of the vision is amended to ensure that economic development of all sizes and types are embraced.</i></p> <p><i>The vision now references 'Working with our partners' to facilitate the objectives.</i></p> <p><i>References to health and wellbeing are more fully embedded into the vision and objectives.</i></p>
<p>It was stressed that it is not clear who will deliver the vision or how it will be delivered. The suggestion is to state "working with our partners". An additional comment suggested that the objectives</p>	<p><i>Reference to putting 'placemaking at the heart of development' has been incorporated into the vision.</i></p>

<p>of the vision should be capable of being monitored.</p>	<p>References to 'beautiful' have been deleted from the vision and objectives.</p>
<p>It was considered that the strategic objectives should line up more closely with the Garden Communities principles which are stronger in aspiration for the highest quality in all developments.</p>	<p><i>The vision and objectives have been reorganised to ensure the interdependency of the three components of sustainable development is acknowledged.</i></p>
<p>There were suggestions that reference needed to be made as to the consideration of adjacent areas within the vision.</p>	<p><i>Reference to the terminology 'green growth' has been removed from the wording of the vision and objectives.</i></p>
<p>There were a number of suggestions to amend the fifth paragraph including, splitting it into separate points and that a more specific health reference should be included.</p>	<p><i>Instead, the vision refers to 'growth without adverse environmental consequences' and 'growth that is environmentally sustainable' for clarification.</i></p>
<p>A number of respondents were concerned that the maps produced for the Regulation 18 consultation were misleading and should not have been published without consultation with local parish councils, borough councillors and county councillors, who are elected for this reason. For clarity it should be noted that each SLP council approved the Regulation 18 consultation, and this included the maps contained within.</p>	
<p>It was suggested that all elements of the vision must be considered together so that there is a cohesive approach to the execution of the vision and a quality to living and working across the SLP areas. It was further recommended that putting 'placemaking' at the heart of development and securing high quality design and respecting the character of our existing communities and the surrounding landscape' should be at the</p>	

<p>heart and an overarching tenet of the strategy.</p>	
<p>There was concern that the vision covers a range of key areas but is silent on public safety and defence requirements. The recommendation is for the vision to include support for national defence needs.</p>	
<p>It was strongly suggested that at this stage of the consultation exercise the vision and objectives should be treated as work in progress, to be refined and developed as the chosen development strategy is clarified. It was further stressed that the plan-making authorities must ensure that they re-visit and iterate the vision and objectives as the Plan develops and avoid the temptation to settle for a generic and otiose set of criteria that could be applied to any location.</p>	
<p>There was concern that, in order to be effective and meaningful, the vision and objectives should be specific to the particular challenges that are facing the districts. It was suggested that they could be more locationally tailored and distinctive, such that it would be clear to anyone reading the vision that it is particular to Cheltenham, Gloucester, and Tewkesbury.</p>	
<p>There was concern that the vision at present is too lengthy and should be designed to be more concise. It was recommended that the vision text should be reduced and the explanation of how the SLP intends to meet the vision contained below the 'vision statement'.</p>	

It was stressed that the policies of the SLP should be clearly informed by the vision and should manifest themselves as the conduit via which the outcomes sought by the vision will be achieved. It was further suggested that the vision should be completely clear that if the policies are successfully applied, the future state of the district described by the vision is the natural conclusion.

It was recommended that the key development proposals that will in due course be subject to policy provisions within the SLP should form part of the described outcomes, expressed in specific terms such that there can be no mistake that this vision relates to Cheltenham, Gloucester and Tewkesbury in order to ensure that they are not generic being arguably capable of applying to anywhere. Another respondent suggested that the vision avoids expressions such as 'beautiful', 'flourishing circular economy', 'thriving cultural offer will have flourished' etc. as these are too generic.

There was concern that presently, due to the stage the Plan has reached, the vision and objectives are not capable of being measured effectively or meaningfully and that further work is required to ensure that the vision and objectives will act as clear signposts to the policy framework that will underpin them.

It was suggested that the vision should be framed on the basis that the SLP is firstly a strategic land use document, with a clear spatial remit at its heart and that

<p>this should inform everything that the plan seeks to manage and influence.</p>	
<p>Several respondents considered that the spatial ambition of the plan, and all of the attendant outcomes that flow therefrom, should be the fundamental building block for all of the policies that the emerging Local Plan contains.</p>	
<p>There was comment that reference to the successful golden valley development aspiration is precisely the type of locationally specific aspiration that should be incorporated into the vision to demonstrate what an effective SLP could achieve.</p>	
<p>There were some specific comments on the vision text as drafted including that it should avoid the use of vague terms such as 'green-growth' unless these are defined, and terms such as 'the highest quality of life for all', which are essentially meaningless and will rely on matters far beyond the remit of land use planning.</p>	
<p>It was suggested that the vision should be founded on a set of outcomes that can be realised, the achievement of which will create the necessary conditions to support/encourage/facilitate outcomes such as increased inward investment. It was further stressed that successful implementation of policy cannot guarantee outcomes and that it is important that this distinction is made.</p>	
<p>It was suggested that the vision and objectives should also be drafted to address directly the key challenges identified at the start of the consultation</p>	

document and be ordered in a way that is consistent with the three objectives underlying the realisation of sustainable development

It was further highlighted that it is important to maintain the emphasis articulated in the NPPF, given that a strong, competitive, and resilient economy will create the necessary conditions to support strong, healthy communities, which in turn will help to foster and support a valued and enhanced natural environment. It is suggested that the interdependency of the three components of sustainable development is acknowledged along with the obligation to plan sustainably for development.

It was considered that the objectives should be ordered and rationalised to ensure that they are focused and clear. It was noted that there are currently 34 objectives, which are both too generic and wide ranging, while also being concerned with inappropriate levels of detail.

It was further considered that there is inappropriate focus within the objectives on matters of detail that should not be a core objective of the Plan and no commentary on how the core settlements of Gloucester, Cheltenham, and Tewkesbury will develop and change.

One respondent suggested that the vision set out by the current Joint Core Strategy (JCS) is much better, albeit that it neglects the environmental dimension.

It was suggested to replace the constant

references to 'growth' with a vision of an area in which the health, wellbeing and quality of life of inhabitants is increased. It was considered this could reiterate that communities will be better served by active travel and good public transport links and infrastructure. It was suggested in addition, that it could refer to economic development that has created sustainable prosperity reflecting new decentralised ways of working. Furthermore, it was felt that it could also stress that the distinctiveness of local communities has been enhanced and not just protected.

It was noted that while the vision is short and to the point, there needs to be a preamble which states that the aims and achievements of the vision will be subject to national Government policies. It was considered that this could cover investment, financial constraints and changes in planning / other policies covering services such as housing, transport, climate change, health and education.

There was concern that the vision needs to be more detailed to show that it will be subject to national government policies including investment, financial constraints, changes in planning and other policies covering housing, transport, health and education.

It was suggested that some supporting text explaining the need for positivity, flexibility and balance would be helpful.

There was general concern that most of the vision is about urban areas and there

<p>should be more rural focus.</p>	
<p>It was suggested that the vision needs to be set in context of the need to be adaptable because the area will face significant change over the next period especially if green growth, climate change and restoring biodiversity are going to be at the heart of it.</p>	
<p>It was considered that there is a lack of focus on existing housing and developments within the vision.</p>	
<p>It was recommended that the vision should contain narrative around both capital and revenue funding.</p>	
<p>In order that the vision and objectives are clear and concise it would be impossible to incorporate all of the suggested changes but nonetheless any comments received will be analysed in relation to wider plan making, particularly where they relate to a particular theme or issue that is being considered.</p>	
<p>General Supporting comments</p>	
<p>There was general support for the focus on sustainable growth, addressing climate change, meeting housing needs, and creating high-quality living environments.</p>	<p>Supporting comments are noted.</p>
<p>Support was generally given to requiring the best possible use of brownfield sites for new development and the release of Green Belt where appropriate to meet housing needs.</p>	
<p>The inclusion of the aspiration to ensure growth is supported by essential transport and other infrastructure, which is critical in successfully delivering new</p>	

<p>sustainable development was generally supported.</p>	
<p>It was considered that the vision was broadly positive in focussing on the better future outcomes that are aspired to.</p>	
<p>Respondents noted that the vision and objectives represent an appropriate set of priorities for the area and will help to address wider objectives relating to the climate and ecological emergencies.</p>	
<p>It was considered that the reference to "Building strong, competitive and sustainable urban and rural economies" ambition is sound planning, in-line with national planning policy.</p>	
<p>One respondent supported the facets of the vision that are concerned with 'green growth', investment in training, skills and development, the attraction and retention of a younger workforce and provided new premises and flexible workspaces to support a flourishing circular economy.</p>	

Landscape

<p>There was concern that the paragraph of the vision that refers to 'conserving the area's special landscapes' is not aspirational enough and does not reflect national policy relating to landscapes. It is considered that this paragraph should make explicit reference to the Cotswold's National Landscape (CNL) and its setting and its national importance and statutory purpose.</p>	<p><i>Stronger reference to the CNL and its setting is incorporated within the vision and objectives given its importance in the local area.</i></p> <p><i>Reference to the terminology 'green growth' has been removed from the wording of the vision and objectives.</i></p> <p><i>Instead, the vision refers to</i></p>
<p>It was considered that reference to 'a</p>	

<p>network of green spaces' helping to secure 'a high-quality environment for people and nature' and 'improvements to biodiversity' are not aspirational enough. It is recommended that the aspiration should be to deliver a nature recovery network that is of sufficient quality, scale and connectivity to secure nature's recovery and that this connectivity will be required across neighbouring authorities.</p>	<p>'growth without adverse environmental consequences' and 'growth that is environmentally sustainable' for clarification.</p>
<p>There was concern with objective 5 in relation to impact on the CNL and other protected landscapes. It is considered that allocations for large-scale renewable energy schemes in the CNL or to a lesser extent its setting would not be compatible and that the identification of 'suitable areas' for renewable energy (specifically wind and solar energy) is a higher priority than the allocation of specific sites.</p>	
<p>It was suggested that alongside conserving the area's special landscapes and its attractiveness as a place to visit, an expanding network of interconnected, multifunctional green spaces and waterways will have secured a high-quality environment for people and nature should be included.</p>	
<p>There was concern that the vision refers to "green growth" and henceforth to "growth" several times, including in key sectors and sustainable locations and there should be greater attention paid to the protection and enhancement of green and natural spaces in this area, including in the CNL.</p>	

<p>It was suggested that references in the vision should be added to nature recovery, biodiversity enhancement and places being safe for all users particularly more vulnerable ones.</p>	<p><i>The vision has been altered to include reference to nature recovery, aligning with the climate change aspects of the vision.</i></p>
<p>An overriding concern of this consultation was the impact of any proposals on the environment.</p>	<p><i>References to 'biodiversity-rich' is incorporated within the phrasing to make clear that this applies to urban areas of the district in addition to the more rural landscapes.</i></p>
<p>It was recommended that it would be good to see the language of nature recovery and biodiversity expressed more explicitly in the text of the vision - for example, paragraph 1 could also reference "nature recovery".</p>	
<p>It was suggested that paragraph 3 be amended to read: "to ensure high quality habitat, priority nature recovery zones and wildlife corridors, valuable green spaces and highest quality farmland are preserved".</p>	
<p>The draft Strategic Objective 'Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments' was suggested to be strengthened by making more explicit reference to nature recovery. For example, using the phrase "supporting nature to recover".</p>	
<p>It was recommended that paragraph 5 of the draft Vision be amended to read: "...a network of biodiversity-rich green spaces and waterways..."</p>	
<p>It was suggested that there is potential to add aims about opportunities to improve existing urban areas, particularly the more deprived areas within the Gloucester, Cheltenham and Tewkesbury</p>	

<p>areas, to the vision statement</p>	
<p>It was commented that there should be greater emphasis on nature on the doorstep and green infrastructure throughout with biodiversity set out as one of the core areas such as digital growth or housing.</p>	
<p>It was suggested that the strategic objectives should start by protecting our current tree population and biodiversity position.</p>	
<p>It was commented that whilst pleased to see nature recovery at the top of the list of key issues, it should also be mentioned up front in the first paragraph of the draft vision, as it's a key priority and is fundamental to meeting many of the other ambitions.</p>	
<p>It was suggested that reference to "a flourishing nature recovery network" is included within the existing statement relating to improvements to biodiversity. It was further suggested to reference "fully mitigating the impacts of new development on existing sites of nature conservation importance" within this section.</p>	
<p>For the strategic objective, it was suggested that the text be amended to refer to 'extending' as well as 'conserving; or maximising opportunities to create and extend new habitat in Nature Recovery Network priority zones.</p>	
<p>Town Centres</p>	
<p>There was concern that the vision does not harness the opportunity to regenerate failing town centres as</p>	<p>The vision has been strengthened to ensure that flexibility to enable</p>

<p>residential centres.</p>	<p>adaptation to allow centres to respond to changes is fully embedded to ensure their future success.</p>
<p>It was highlighted that many villages have centres which need supporting to ensure they remain viable and vibrant and suitably located development can help facilitate this. It was suggested that the objective that refers to "Ensuring strong and vibrant city and town centres" should be amended to read: "Ensuring strong and vibrant city, town and village centres".</p>	<p>Reference to culture within the role of centres has been embedded within the objectives.</p>
<p>It was considered that paragraph three be amended to read: "... through careful management of development and land uses opportunities across the plan area".</p>	
<p>There was a suggestion to alter the wording of the objective 'Ensuring a network of city and town centres that meet the needs of communities' be amended to include supporting cultural uses and events, and that are able to respond and evolve as the role and function of centres changes.</p>	
<p>Furthermore, it was suggested the objective be amended to support the provision of a wide range of different uses appropriate to city and town centres, including new homes, to create activity at different times of the day and build an active city and town centre community. In addition, it was considered important to draw on the uniqueness of the different centres in planning for their future.</p>	
<p>There was general support for the vision to recognise the need for town centres to evolve and adapt, and the need for flexibility in the approach taken.</p>	

<p>It was considered that the vision should add “protect farmland which is feeding us” and that reference to preserving the highest quality farmland is included within the vision.</p>	<p><i>Reference to how brownfield land can be used to protect the BMV soils across the plan area is incorporated to strengthen this aspect.</i></p>
<p>It was suggested that greater emphasis is given to the conservation and enhancement of existing rural areas and countryside recreational activity and local food production.</p>	
<p>It was commented that there seems very little consideration of the actual impact of major development on small communities suggesting that the residents who choose to live in them are understanding that they may have compromised local services.</p>	
<p>There was general concern that building on green belt, flood plain land and establishing large developments will spoil forever the unique rural spaces we have.</p>	

Flood Risk / Water Management

<p>There was general concern about building on flood plains.</p>	<p><i>The objectives reflect that all forms of flooding are given equal consideration using a catchment approach and that active flood risk measures, including natural flood management are incorporated.</i></p>
<p>It is suggested to include further reference to the marine area, encompassing rivers and estuaries, covered under the Southwest Marine Plan.</p>	
<p>It was suggested that the vision is more locally specific and a suggestion to insert the following: “A catchment approach will be taken to flood risk management. Natural flood management will be a priority, with urban watercourses greened and buffers promoted along rural</p>	<p><i>The vision stresses that by 2050 flooding will have been mitigated against and will not pose a risk to the SLP area.</i></p>

watercourses. Features such as permeable paving and raingardens will be commonplace in urban areas, there will be more tree cover, and wetlands areas will be expanded. The delivery of multifunctional benefits for people and nature will be prioritised, with watercourses at the heart of a green infrastructure network”.

It was considered that the vision and objectives should make clear that flooding relates to all forms of flood risk.

It was stressed that the ‘climate change’ objective should go further by considering the impact of development on the flooding of other areas and planning for the appropriate use of the flood plains, setting aside land specifically for that purpose.

The objectives need to consider that the interdependencies of the different types of infrastructure that needs to be considered effectively and not to repeat the issues of the past by managing each of these independently.

An amendment was suggested to the fifth paragraph to read: “Growth will have been supported by the provision of a range of essential digital, transport, community and other infrastructure. Active flood risk management and enhancements to biodiversity will be integral to decisions around growth and development...”

It was suggested for the vision to include the requirement for the safe movement of people during a flood event if flooding becomes so severe and where it isn’t

<p>affordable to protect houses that are flooded regularly.</p>	
<p>It was suggested that Natural Flood Management should be embedded as a core component of flood management response, especially as it brings additional nature recovery and river restoration opportunities.</p>	
Culture / Heritage	
<p>It was suggested that the opaque language of "cultural offer" should be replaced with a clear commitment to respect and enhance the area's distinctive built heritage of different eras. It was suggested this could include support for local sport and outdoor activities both at major venues and in the community and providing a supportive environment for our important community and cultural festivals.</p>	<p><i>References to 'preservation' have been replaced with 'conservation' to ensure the careful management of heritage assets is reflected.</i></p>
<p>There were concerns from respondents that they don't wish to see Cheltenham, Gloucester & Tewkesbury being eroded by a 'megacity'.</p>	
<p>It was suggested that reference to heritage assets being 'preserved' is replaced with 'conserved', to reflect the terminology of the NPPF and the need for careful management of change, rather than preservation unchanged.</p>	
<p>It was suggested that there is also an opportunity within the vision to harness the potential of the outstanding historic environment of the area as a driver for tourism and heritage-led regeneration, particularly in centres and historic high streets.</p>	

<p>It was suggested that the role of heritage buildings as assets that are valued, conserved and put to good use should be highlighted within the vision.</p>	
<i>Economy</i>	
<p>It was considered that a broad range of new homes is integral to delivering the economic aspirations of the vision.</p>	<p><i>Reference to 'full fibre' is replaced with ensuring access to the latest high speed, reliable data and digital connectivity in both urban and rural areas.</i></p>
<p>It was suggested on the 'Building strong, competitive and sustainable urban and rural economies' objective that reference to 'full fibre' should be replaced with 'appropriate, modern'.</p>	<p><i>The wording of the vision is amended to ensure that economic development of all sizes and types are embraced.</i></p>
<p>There was concern that there needs to be a far more wide reaching look at the way our residents will both live, work and play now and into the future. This means that the nature of jobs and working patterns will change as will modes of transport.</p>	
<p>It was suggested that the 'Building strong, competitive and sustainable urban and rural economies' objective should include not just home-based working but home-based businesses such as garage start up space. It was further considered that there should also be reference for small start-up units rather than the larger industrial estate units to enable a business to take a smaller growth step.</p>	
<p>On the objective of 'Building strong, competitive and sustainable urban and rural economies' it was suggested that it should drive up agricultural ecosystem development i.e. from farm to table (home/restaurant) or farm to other use e.g. willow furniture/biofuel should be included.</p>	

It was suggested that the plan should clearly set out a vision for industrial development. This will enable people to work within walking, cycling, bus distance from their homes, rather than creating a vast commuter land.

It was suggested that any new housing sites be situated at a distance from operational industrial sites with incompatible land uses to contribute toward a more sustainable and suitable environment and comply with the guidelines for compatible land use.

Green Belt

It was suggested that development should be promoted within sites which are located adjoining major sustainable settlements, and unless 'Very Special Circumstances' are demonstrated, are not within the Green Belt in the first instance.

There was concern that the vision, while highlighting the benefits of brownfield development, does not refer to the need to consider the well managed release of parts of the Green Belt to deliver requisite housing and jobs. It was stressed that it is clear that three of the scenarios which do not necessitate development on Green Belt land would fail to provide for the full amount of new homes and jobs needed.

<p>It was recommended that the fourth paragraph of the vision is amended to link growth in sustainable locations to the release of Green Belt land, where further assessment work deems this to be appropriate.</p>	
Affordable Housing	
<p>It was suggested that the vision needs to differentiate between affordable houses as currently defined and genuinely affordable houses, in particular for those working in the delivery of public services.</p>	<p><i>The vision has been strengthened to include reference to meeting housing needs in full to include the gypsy, traveller and travelling showperson community, other specialised needs and those wishing to build their own homes (self and custom build homes).</i></p>
<p>It was recognised that second and holiday homes are a problem across the Cotswolds' because they push up prices making houses even more unaffordable. Ultimately this means employers in those areas can't get staff because it's too expensive for them to live there.</p>	
<p>There was a suggestion that the vision should make explicit reference to meeting 'identified needs' for both market & affordable homes across the SLP area. Equally, the vision should reflect that new market homes should meet 'identified needs', to reduce the affordability gap between affordable and market housing (which, in turn, places additional pressures on the overburdened private rented sector).</p>	
Green Infrastructure	
<p>One respondent suggested that there is reference to 'a network of interconnected green spaces and waterways', but less sense of growing green infrastructure</p>	<p>References to green infrastructure are more fully embedded within both the vision and objectives</p>

<p>alongside (and supported by) the proposed housing and economic growth.</p>	
<p>It was suggested that the fifth paragraph is amended so the end of the final sentence reads: "and existing green spaces will be supported to respond to increased visitor pressures".</p>	
<p>It was considered that a point should be made in the vision to ensure optimal outcomes, including for climate and nature, but also other issues such as transport. An example is the need to identify land to develop large Suitable Alternative Natural Greenspaces (SANGs) to help manage and mitigate recreational pressure at popular designated sites.</p>	
<p>There was a suggestion that the third paragraph of the vision be amended as there is no mention of new housing developments including green spaces.</p>	
<p>Biodiversity</p>	
<p>It was suggested that the vision should address impacts upon, and opportunities for, the natural environment as a high priority - 'an economy is built upon the environment'. It was further considered that the vision needs to clearly set out the environmental ambition and linked opportunities for the plan area.</p>	<p>References to 'biodiversity-rich' is incorporated within the phrasing to make clear that this applies to urban areas of the district in addition to the more rural landscapes.</p>
<p>It was suggested that the plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity and considering opportunities to enhance and improve the quality of connectivity.</p>	

<p>It was further suggested that the fourth paragraph be amended to refer to "Growth in ecologically sustainable locations".</p>	
<p>There was a suggestion that where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network as applicable.</p>	
<p>It was noted that the vision mentions the Climate emergency. However, there is also a biodiversity emergency which must be held with equal status alongside climate change as it has the potential to contribute to addressing climate change.</p>	
<p>It was considered that the inclusion, interaction and nature connectedness of people must also be considered as a priority, especially in terms of their wellbeing and developing love for the natural world.</p>	
<p>It was stressed that there should be an overarching strategy in the plan for the natural environment covering all aspects related to ecosystems, nature recovery, landscapes, geodiversity, ecology, biodiversity etc.</p>	