

**Cheltenham Borough, Gloucester City  
and Tewkesbury Borough councils'  
Strategic and Local Plan (SLP)**

**Vision and Objectives  
Topic Paper**

November 2025

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Appendix 1 – Initial Draft Vision and Strategic Objectives

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# Part 1 – Proposed Vision and Strategic Objectives

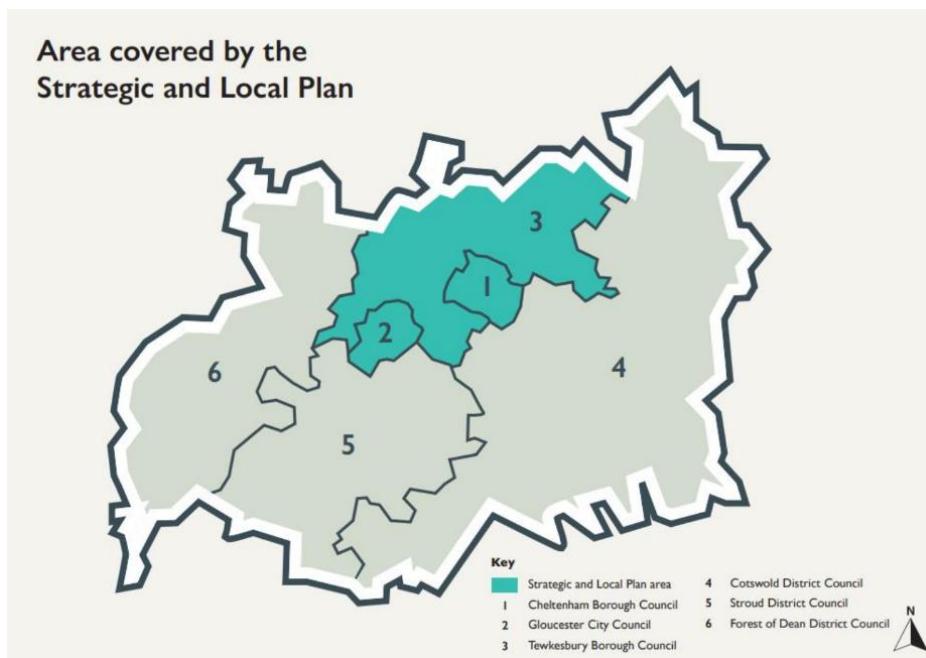
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## 1. Introduction

- 1.1. The purpose of this topic paper is to set out the proposed Vision and Objectives that will guide the Strategic and Local Plan (SLP) and explain how they have been formulated.
- 1.2. The SLP needs a bold, ambitious overarching vision. The vision should be supported by Strategic Objectives, which set out the ways that the vision will be achieved. The vision and strategic objectives provide the foundation on which the plan's strategy and policies are then based. Therefore, if the policies are successfully implemented, the future state of the SLP area described by the vision will be the natural conclusion.
- 1.3. The proposed Vision and Objectives have been informed by (amongst other things) national planning policy, consultation undertaken earlier in the plan-making process, corporate policy from each of the constituent local authorities and the recommendations from the initial Sustainability Appraisal (SA) and wider SLP evidence base.
- 1.4. The proposed Vision and Objectives to guide the SLP are set out below. Part 2 of this topic paper sets out how they have evolved to date.

## 2. Context

- 2.1. Since 2008, Cheltenham, Gloucester and Tewkesbury local planning authorities (LPAs) have worked together to produce a strategic plan covering their three areas. This resulted in the adoption of the Joint Core Strategy (JCS) in 2017, which provided an approach for how the three areas would develop.
- 2.2. Major changes have happened since then including the effects of a global pandemic that has touched our lives in many ways. We also recognise the escalating climate change and ecological emergencies and understand that we have an active role to play in managing change that has these principles at its heart.
- 2.3. In the summer of 2023, the three LPAs agreed to produce a single plan rather than three separate plans to cover the areas of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council. The new plan is called the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). Gloucestershire County Council has also joined as a partner to the SLP.
- 2.4. The figure below shows the area of Gloucestershire covered by the SLP:



- 2.5. The SLP authorities are working together to draw up the Plan because, although we are separate councils with our own unique identities, the issues we are trying to address (such as housing needs, employment, environmental and climate change), and the policies that will be needed to solve them, do not fit neatly to administrative boundaries. These are shared questions that will require shared answers. In December 2024 the Government published the [English Devolution White](#)

[Paper](#) setting out its position regarding local government reorganisation in all two-tier areas in England. At the time of writing, the details for Gloucestershire are being considered. Notwithstanding this, the SLP authorities are committed to continuing to prepare the SLP and ensure we work collectively and collaboratively on identifying and meeting the needs of our area.

- 2.6. The SLP will bring together four core elements – formerly the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy and the local plans for each of those areas under a single plan setting out a long-term vision for development.
- 2.7. The publication of this Topic Paper is part of the ongoing engagement under Regulation 18.

### 3. What has happened so far?

- 3.1. Councils have a legal 'duty to co-operate' with other local authorities and public bodies. This means we must engage constructively and on an ongoing basis to maximise the effectiveness of plan-making through seeking to agree strategic, cross boundary planning matters. The Gloucestershire district councils and county council have formalised this in approving a 'Gloucestershire Statement of Common Ground' (SoCG)<sup>1</sup>. This includes agreements on different issues such as climate change, the delivery of development needs, flood risk and transport and has been approved by all the councils.
- 3.2. To reflect the SoCG the councils have worked with other councils in Gloucestershire to produce evidence to support the emerging SLP. This includes information on how many new homes and jobs might be required in our area, and a review of issues and opportunities in our city and town centres.
- 3.3. The SLP will be a plan to meet development needs in a way that achieves sustainable development, including addressing the causes of climate change, mitigating its effects and promoting nature recovery. The SLP will also include policies to safeguard against other environmental effects of development. All local plans are required to be informed throughout their preparation by a SA<sup>2</sup>. A draft SA report was prepared to inform the Regulation 18 stage, including evaluating the likely sustainability effects of the draft vision, objectives, and spatial options.
- 3.4. The emerging Plan is also required to be accompanied by a Habitats Regulations Assessment (HRA)<sup>3</sup> to ensure adverse impacts on internationally designated habitats sites are avoided or, where this is not possible, effectively mitigated. A draft HRA was similarly prepared to inform Regulation 18 stage.
- 3.5. As part of the preparation for the SLP a public consultation (Regulation 18)<sup>4</sup> was undertaken for eight weeks, from Tuesday 16<sup>th</sup> January until Tuesday 13<sup>th</sup> March 2024 that focused on spatial options and key policy areas and this consultation introduced a draft vision and strategic objectives for consideration.
- 3.6. The next formal stage of plan-making is the preparation of the Regulation 19 pre-submission plan, which would be the Plan that the Councils expect to submit for examination. Full details are available on the SLP website: [strategiclocalplan.org](http://strategiclocalplan.org)

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<sup>1</sup> [SLP Statement of Common Ground](#)

<sup>2</sup> [Sustainability Appraisal \(incorporating Strategic Environmental Assessment\)](#)

<sup>3</sup> [Habitats Regulation Assessment](#)

<sup>4</sup> [Regulation 18 Consultation](#)

however the SLP authorities are committed to ongoing engagement as part of Regulation 18. This includes publication of topic papers, such as this one, publication of evidence base and focused sessions with stakeholders and key partners, including parish councils. The full details of this emerging plan for engagement will be published on our website as they develop.

- 3.7. Much more evidence gathering is under way, including, for example, a new strategic flood risk assessment (SFRA) and a review of the Green Belt within the SLP area.
- 3.8. What is clear is that with a relatively new Government in place we are embarking on a journey of significant change across the planning system on a scale we have not experienced since the 1970's. The SLP authorities are being responsive to these changes and will support communities and stakeholders in navigating this complexity. Whilst there have already been many changes, we expect more to come, so the SLP will need to be agile in its approach to be able to deal with these as we prepare our plan.

## 4. Proposed Vision and Strategic Objectives – November 2025

By 2030

*The focus will be on working with our partners to facilitate the optimum development strategy through the provision of carbon neutral, sustainable, high-quality market, affordable and other specialist homes and the provision of new jobs and infrastructure to support them, alongside the facilitation of nature recovery, decarbonisation, biodiversity and conserving the areas special landscapes. To achieve this, priority will be on making the best possible use of brownfield sites and previously developed land, regeneration of existing sites and comprehensively planned new biodiversity-rich development with optimum densities in well-connected sustainable locations that will help towards:*

Environment	<ul style="list-style-type: none"><li>• Protecting greenfield land and Best and Most Versatile (BMV) soils across the plan area resulting in an efficient use of natural resources whilst providing nature protection.</li><li>• Providing for the full range and types of housing needs for all members of the community</li><li>• Achieving carbon neutrality and working towards addressing the causes and effects of climate change.</li><li>• Conserving, enhancing and repurposing the areas rich diversity of heritage, cultural assets and the historic environment through carefully considered developments and enhancements.</li><li>• Creating active environments by reducing the need to travel through providing healthy, accessible and walkable neighbourhoods where key services are available without the need to rely on private motorised transport;</li><li>• Achieving a vision-led approach to prioritise genuine sustainable transport and active travel options by ensuring new development is located where sustainable transport infrastructure can be best utilised.</li><li>• Conserving, managing and enhancing the area's unique natural environment, landscape and biodiversity, including its waterways, Sites of</li></ul>
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	<p><i>Special Scientific Interest (SSSI), the Cotswold's National Landscape and its setting, and areas of landscape and biodiversity importance,</i></p> <ul style="list-style-type: none"> <li>• <i>Achieving measurable net gains in biodiversity – ensuring developments provide new and support existing green infrastructure within urban and rural areas to provide movement corridors for people and wildlife.</i></li> <li>• <i>Ensuring development is located in areas that are not liable to any forms of flooding and making effective use of active flood risk management and sustainable drainage systems whilst improving water quality by applying a catchment based approach and maximising the opportunities to use land to manage flood water;</i></li> <li>• <i>Ensuring development minimises the generation of waste and supports the waste hierarchy of prevention, preparing for reuse, recycling and recovery of materials during both construction and occupation.</i></li> </ul>
Social	<ul style="list-style-type: none"> <li>• <i>Ensuring the area's thriving cultural offer is flourishing</i></li> <li>• <i>Supporting and safeguarding village shops and community facilities that serve the everyday needs of local communities.</i></li> <li>• <i>Ensuring that new development is integrated well with existing communities and delivers the new social and community infrastructure requirements set out in the Infrastructure Delivery Plan to meet the needs of communities;</i></li> <li>• <i>Supporting the provision of a wide range of different uses appropriate to city and town centres, including new homes, employment, social and cultural uses to build an active city and town centre community.</i></li> <li>• <i>Promoting opportunities and access to a range of skills and vocational training and levels of education for all ages.</i></li> <li>• <i>Developing the area's role as a tourist destination, building on the unique and varied cultural offer that already exists.</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Delivering sufficient new homes in the right places to meet the needs of our communities in full, including 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).</i></li> <li>• <i>Supporting the necessary retention and management of existing sports and leisure facilities, that will unlock opportunities for healthy lifestyles with inclusive access to sport and recreation.</i></li> <li>• <i>Ensuring new developments create high quality living environments that prioritise health and mental wellbeing.</i></li> </ul>
Economic	<ul style="list-style-type: none"> <li>• <i>Fostering inward investment, innovation and growth in key sectors including cyber and digital-tech, food/agri-tech, advanced engineering and tourism.</i></li> <li>• <i>Improving the area's economic resilience, supporting a highly skilled workforce, skills and educational development attainment.</i></li> <li>• <i>Providing the right conditions and sufficient land in the right locations to support existing and new businesses of all sizes and types, to foster economic growth that is environmentally sustainable.</i></li> <li>• <i>Supporting the needs of agricultural businesses, encouraging farm diversification, the development of small rural business units, the conversion of existing buildings for rural business use, appropriate expansion of existing businesses.</i></li> <li>• <i>Supporting effective home working through provision of housing with adequate space and services.</i></li> </ul>

### By 2040

*In addition to the above, the focus will be on putting 'place-making' at the heart of development to create a net zero carbon future, continuing to provide a balanced mix of house tenures and types to satisfy the full range of needs and allowing people to move around without the use of the private motorcar. In addition, fostering the right conditions to allow for a flourishing circular economy that creates jobs and delivers economic growth. This will create active / inclusive / sustainable / healthy / thriving / energy efficient communities whilst maintaining biodiversity and special landscapes and sustaining rural areas in order to achieve:*

Environment	<ul style="list-style-type: none"><li>• The delivery of net zero carbon energy development, making the most effective use of renewable energy opportunities, both in new developments and off-site energy generation.</li><li>• The provision of a network of interconnected green spaces and waterways to secure a high-quality environment for people and support nature recovery.</li><li>• Focusing significant development in locations which are or can be made sustainable, offering a genuine choice of transport modes.</li><li>• The preservation of valuable green spaces and highest quality agricultural land.</li><li>• The provision of new frequent public transport systems that work for local people and visitors.</li><li>• Protecting flood plain land and making effective use of natural flood management techniques, whilst continuing to secure improvements in water quality.</li><li>• Continued improvements to biodiversity - ensuring developments provide and manage biodiversity rich new and existing green infrastructure in both rural and urban areas.</li><li>• The continued protection of high quality agricultural land to provide food security and maintain the areas local farming identity.</li></ul>
Social	<ul style="list-style-type: none"><li>• Sustainable growth that will have unlocked opportunities for healthy lifestyles and inclusive access to sport and recreation.</li><li>• New development designed to ensure natural surveillance and active street frontages to reduce</li></ul>

	<p><i>opportunities for crime and anti-social behaviour.</i></p> <ul style="list-style-type: none"> <li>• <i>A strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.</i></li> <li>• <i>Preservation and enhancement of the area's unique historic and cultural environment, archaeological heritage and geological assets.</i></li> <li>• <i>Improving and ensuring the vital role of the area's city centre, town centres and high streets and ensuring flexibility to enable adaptation to allow centres to respond to future changes in role or function and to reinforce their roles in supporting cultural uses and events.</i></li> <li>• <i>Delivering new developments that are supported by the full suite of social and community infrastructure provision set out in the Infrastructure Delivery Plan.</i></li> <li>• <i>Providing the right environment for business start-ups, entrepreneurship, and the improvement and expansion of education and training facilities to develop the skills employers need.</i></li> </ul>
Economic	<ul style="list-style-type: none"> <li>• <i>Providing the right environment for business start-ups, entrepreneurship, and the improvement and expansion of education and training facilities to develop the skills employers need.</i></li> <li>• <i>Ensuring access to the latest high speed, reliable data and digital connectivity in both urban and rural areas.</i></li> <li>• <i>A younger workforce that will have been attracted by investment in training, skills and development and provided with new premises and flexible workspaces to support a flourishing circular economy in both urban and rural areas.</i></li> </ul>

### By 2050

*In addition to the above, the focus will be on maintaining integrated or self-contained growth in sustainable locations without adverse environmental consequences, along with supporting infrastructure and jobs. Public transport and active travel will be embedded into people's lifestyles and flooding will have been mitigated against. Climate change will no longer pose a risk as we have adapted through a net zero carbon plus environment meaning the area will be fully resilient and equipped to achieve:*

Environment	<ul style="list-style-type: none"><li>• A net zero carbon plus future in perpetuity with energy harnessed solely by renewables</li><li>• Habitats will have been fully restored through nature recovery and landscapes enriched to support a thriving wildlife population.</li><li>• The majority of journeys will be by walking, cycling and mass public transit</li><li>• Environmental sustainability is a central facet of all new development, encompassing water management and adaptation of the built environment.</li><li>• An exceptional geological heritage, the highlights of which include the Cotswolds National Landscape.</li><li>• Delivering new developments that are fully integrated into the green infrastructure network to allow people access to nature and green spaces to maximise wellbeing and active travel opportunities</li><li>• All brownfield, under-used, vacant and redundant land will have been redeveloped to sustain communities and provide a home for everyone</li><li>• Houses and businesses that are not at risk of flooding and a healthy water environment where people and wildlife flourish.</li></ul>
Social	<ul style="list-style-type: none"><li>• Harness the opportunities of growth to create thriving, net zero carbon plus, resilient and healthy places, affording the highest possible quality of life for all.</li><li>• People's housing needs will be met through the delivery of a wide choice of sustainable, high-</li></ul>

	<p>quality market, affordable and other specialist homes that meets the needs of communities and there is no homelessness.</p> <ul style="list-style-type: none"> <li>• To draw on the uniqueness of the different centres in planning for their future.</li> <li>• High quality living environments that prioritise health and mental wellbeing, harmonise with existing communities to create better places for people and wildlife.</li> <li>• Active movement that will have been embedded into people's lifestyles such that reliance on car use will be minimal</li> <li>• Social and community infrastructure will have been delivered and maintained to support the needs of existing and new communities.</li> <li>• City, town and village centres that are thriving, adapting to changes and suitably flexible to enable their long-term health and vitality whilst retaining their unique characters.</li> </ul>
Economic	<ul style="list-style-type: none"> <li>• Sustainable growth, without environmental consequences that will have been supported by the provision of a range of essential digital, transport, community and other infrastructure.</li> <li>• A thriving tourism market underpinned by the highest quality natural and built environment.</li> </ul>

## Local Priorities

### Tewkesbury

- Tewkesbury will care for its place, its people and its environment, supporting people and strengthening communities with a focus on recognising and valuing the distinctiveness of the different communities that make up the borough and the young people that are so essential to the future. The Climate and Ecological Emergency will initiate urgent action to address the causes of climate change and make the Borough carbon neutral, biodiversity rich and flood resilient by 2030. Service delivery will be informed by Place Plans to ensure that local infrastructure needs are connected to any planned growth with the provision of affordable housing significantly increased and homelessness diminished. The economy will be encouraged to grow and flourish through attracting new investment and promoting

*growth particularly in the advanced engineering and manufacturing, agri- tech and aerospace sectors. The communities will be robust, healthy and thriving places to live with health and wellbeing strategies informing future policy direction. The Garden Communities programme will provide a unique opportunity to create fully sustainable principles into the Borough.*

### **Cheltenham**

- *Cheltenham will become the new cyber capital for the UK, bringing with it a catalyst for growth and change in Gloucestershire, creating a destination of global significance. This will be ignited by the Golden Valley Development, a pioneering Garden Community integrating hi-tech business, residential and leisure uses. Cheltenham declared a climate Emergency in 2019 and has a target of reaching net zero by 2030, working with residents, communities and businesses to achieve this. The number of affordable homes will be increased and a fabric first and energy efficient approach to homes will be achieved through the housing investment plan and residents will benefit from a more modern, financially sustainable and efficient council. Development and regeneration opportunities will be facilitated to support more town centre living to ensure that Cheltenham's growth and prosperity continues.*

### **Gloucester**

- *Gloucester will build on its strengths to become a more sustainable, green and fair city of diverse culture and opportunity with the health and wellbeing of its residents at the heart of everything. Tackling health inequalities, eliminating homelessness and creating more inclusive communities will be prioritised, alongside greening the city with a focus on improving the biodiversity of green spaces, tree planting and combatting environmental crime. In facilitating sustainable development schemes that prioritise the protection and improvement of the environment and mitigate against climate change, the city will be net zero by 2030. Gloucester will be a leading location for knowledge-based jobs and enterprise, and will be a thriving centre for health, service and advanced manufacturing industries. Regeneration in Matson and Podsmead as part of the wider revitalisation of the city, building on the success of the Forum will help drive economic growth and showcase everything the city has to offer. The promotion of the city's rich heritage and attractions will embed its position as a visitor destination, while also enabling new creative industries to flourish making the most of Gloucester's unique attributes and talent.*

# Part 2 – Inputs into the Vision and Strategic Objectives

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## 5. Sustainability Appraisal

- 5.1. The SA of the Regulation 18 (2024) SLP explains that local plans should set out a clear vision for the local authority area, which is positive and aspirational but also deliverable. It stresses that, stemming from the vision, a series of objectives should be established which set out how key issues for the area will be dealt with. It explains that together, the vision and objectives of a local plan should be clear, realistic, locally distinctive and spatial in planning terms, and be based on a sound understanding of the form and function of the Plan area.
- 5.2. The SA report confirms that the proposed SLP vision aims to harness opportunities for green growth across Cheltenham, Gloucester and Tewkesbury to provide thriving, sustainable and healthy places.
- 5.3. It reports that the vision performs well across all SA Objectives. It provides strong aspirations for climate change through mitigation technologies and adaptations, focusing on green growth and providing the necessary conditions for a circular economy. In addition, the SA states that the vision performs well in regard to flood risk, providing aspirations to adopt active flood risk management and establish a strong network of green infrastructure (GI)<sup>5</sup>.
- 5.4. Furthermore, it states that the provision of GI, and the aim to improve the uptake of active and sustainable travel, has resulted in the vision performing well in terms of human health as well as transport and accessibility. It also reports that the vision additionally seeks to boost the economy, direct inward investment into key sectors and develop a highly skilled workforce, with likely benefits for both economic and educational growth.
- 5.5. In terms of improvements, the SA suggests that, although positive scores were identified across all SA Objectives, minor rather than major positive impacts were identified against SA Objectives 5 (cultural heritage) and 8 (waste). It states that the *“vision could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, and by making reference to sustainable waste management*

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<sup>5</sup> [What is Green Infrastructure](#)

*including preventing the generation of waste and supporting the recycling, recovery or re-use of materials during both construction and occupation of new development”.*

- 5.6. The SA also assesses the eight draft strategic objectives for the emerging SLP. It reiterates that the strategic objectives underpin the overarching vision for the SLP, setting out further detail and aspirations for the delivery of sustainable growth.
- 5.7. The SA reports that in general, the objectives perform well across the SA objectives. In terms of sustainability performance, the objectives deliver a range of major positive, minor positive and negligible effects. The SA reports that the objectives seek to adopt a proactive approach to climate change mitigation and adaptation, improving flood risk management, encouraging de-carbonisation and supporting a strong GI network. Additionally, it reports that they recognise the importance of delivering well-designed communities which incorporate open space and local services to meet the needs of residents, supported by appropriate social and transport infrastructure. The SA concludes that these measures are expected to improve health and wellbeing, address social inequalities and ensure development remains in keeping with the local identity, and support the delivery of sustainable growth.
- 5.8. The SA report is however concerned about the ineffective wording in relation to the use of brownfield land. It recommended that (particularly SLP Objective 7) make direct reference to the use of brownfield land and how its use can be maximised to protect greenfield land within the area and result in an efficient use of natural resources. It also considered that reference to brownfield land usage within the SLP vision and SLP objectives would also benefit from wording on how it can be used to protect Best and most versatile agricultural land (BMV)<sup>6</sup> soil in the SLP area, especially as the area has large areas of Grade 3 soils and pockets of Grade 1 and 2.

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<sup>6</sup> The highest quality land is known as BMV (best and most versatile). This is grades 1 to 3a.

## CHANGES PROMPTED BY SA

*Stronger references to the importance of conservation and enhancement of cultural heritage and the historic environment have been included.*

*Amendments to include reference to sustainable waste management including preventing the generation of waste and supporting the recycling, recovery and re-use of materials during both construction and occupation of new development.*

*Reference to how brownfield land can be used to protect the BMV soils across the plan area is incorporated to strengthen this aspect.*

## 6. Issues and Options Consultation – by Theme

6.1. Since the Regulation 18 consultation was undertaken, we analysed responses to determine the direction of the SLP, a workbook containing a record of all responses received is available to [view here](#). The NPPF requires plan-making to be shaped by a positive vision and objectives that contribute towards the three strands of sustainable development. We need to ensure that we get the vision right, whilst ensuring enough flexibility exists within it to respond to changing circumstances. We also appreciate that the vision, nor the SLP will not fully meet or resolve the issues raised and there will be ongoing push and pull. The focus is on achieving a balanced approach that creates the right environment within which to innovate, positively transform our areas and empower our communities.

6.2. The responses to the Regulation 18 consultation, along with changes to national guidance, recommendations from the SA report and updated corporate plans have shaped the changes to the vision and accompanying objectives set out in this Topic Paper. Ensuring ongoing engagement on the vision and objectives will also help shape and develop other key matters to ensure that the plan is holistic and ultimately effective.

6.3. Two questions concerning the vision and strategic objectives were put forward at the Regulation 18 stage to initiate debate on this topic and set out below:

### Questions

- 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?**

6.4. Whilst analysing Regulation 18 comments, a number of main issues (themes) were identified – an assessment of each is summarised below and in more detail at Appendix 2, along with commentary on how those responses have helped to shape an updated vision and objectives. As the vision and accompanying objectives are set to represent all communities within the SLP area it is important that it is formed and shaped under scrutiny by the local population and that the consultation process continues to evolve.

## CHANGES PROMPTED BY REGULATION 18 RESPONSES

*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.*

- 6.5. The following represents the main themes identified:

### *Timing of Vision*

- 6.6. Respondents recommended extending the vision and objectives' timeframe to at least 2046 due to the plan's lifespan and changing environment. They suggested adjusting the vision end date if there's a delay in adopting the SLP, incorporating shorter delivery timeframes for housing elements and setting long-term, mid-term, and short-term objectives that can be revised with each SLP examination. Additionally, they proposed aligning strategic policies with a minimum 30-year outlook, as per the 2023 NPPF guidelines.

### *Sustainable Transport / Active Travel / Public Transport*

- 6.7. Respondents highlighted the need to strengthen the vision for sustainable transport by promoting active travel routes and reducing car reliance to support a low carbon future. They suggested enhancing public transport, focusing on high-quality corridors and upgrading train and bus services for better access to business parks. It was considered that the vision should better balance travel choices, especially public transport.
- 6.8. Suggestions included directing new development to areas with existing sustainable infrastructure, utilizing recent improvements in highways, cycle paths and pedestrian routes. Safety in transport should be recognized, and public footpaths and cycleways specifically mentioned. There were mixed views on the 15/20 minute city concept<sup>7</sup>, with concerns about motor traffic congestion. The term "active environments" was encouraged to promote active travel, walkable neighbourhoods, and interconnected green spaces.

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<sup>7</sup> Also known as '15-minute cities' - <https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>

## CHANGES PROMPTED BY REGULATION 18 RESPONSES

*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**.*

*Reference to 'active environments' is incorporated into the wording.*

*A stronger commitment within the vision to **improving and facilitating public transport provision** to assist this agenda.*

*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**.*

## Climate Change

- 6.9. Respondents emphasised aiming for net zero or 1990 levels of carbon emissions, with mitigation through offsetting funds if needed. They generally supported growth aligned with decarbonisation, using nature-based solutions and ensuring housing is highly efficient in carbon emissions. Concerns were raised about growth conflicting with net zero and biodiversity, with some concerns about "Green Washing."
- 6.10. Recommendations included significant tree planting, promoting reuse/recycling, installing public EV chargers in every village and supporting "Green Growth" for all development sizes. It was considered that the vision should reflect contributions to climate change mitigation, increased local renewable energy, new mass public transit and substantial recovery in the natural environment with enhanced biodiversity and ecological networks.
- 6.11. The SLP authorities are undertaking a 'Climate Change' Topic Paper that will inform the strategic and local policy direction on this issue for the SLP.

#### **CHANGES PROMPTED BY REGULATION 18 RESPONSES**

*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 measurable outcomes and milestones for climate change.*

*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.*

#### **Infrastructure**

- 6.12. Respondents suggested detailing infrastructure needs for each development scenario and ensuring infrastructure improvements precede development. They recommended including a clear infrastructure plan detailing necessary upgrades and timelines, referencing the Levelling up and Regeneration Act 2023.
- 6.13. It was considered that education and research should be emphasised in the vision, with aims to improve education quality and monitor results. It was further suggested that hospital provision should be adequately considered. Concerns were raised about the closure of community facilities, which contradicts the vision's goal of supporting growth with new community facilities.

#### **CHANGES PROMPTED BY REGULATION 18 RESPONSES**

*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.*

## *Emergency Services Infrastructure / Public Safety*

6.14. Respondents emphasised that the infrastructure list should include emergency services and rescue infrastructure. Concerns were raised about public safety, suggesting the plan should address road speed enforcement, vandalism and crime, with an objective to reduce crime and make the area safer for residents.

### **CHANGES PROMPTED BY REGULATION 18 RESPONSES**

*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.*

*More reference to **community safety** is incorporated to help ensure that the area is safe for all residents going forward.*

## *Rail Network*

6.15. Respondents emphasised the need to prioritise the rail network in Gloucestershire over the M5, suggesting reopening old railway lines and transferring road freight to the railway network from the Ministry of Defence, Ashchurch. They also recommend considering Park and Ride facilities for Tewkesbury, especially due to the Ashchurch development. It was considered that development should be promoted in areas with good rail connectivity, and the vision should reflect the potential for new and improved station and train facilities.

#### CHANGES PROMPTED BY REGULATION 18 RESPONSES

*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**.*

*Reference to '**active environments**' is also incorporated into the wording.*

*There is now a stronger commitment within the vision to **improving and facilitating public transport provision** to assist this agenda.*

*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**.*

#### Capacity / Density

- 6.16. Respondents suggested conducting a detailed settlement-by-settlement analysis of land capacity and place-making opportunities. There was general support for emphasising flexibility in housing types, densities and design approaches. It was considered that the vision should clarify that higher densities and, where appropriate, greater heights are necessary to meet housing needs sustainably. There were some concerns about the potential tensions between policies aiming to maximize housing density and those addressing the full range of housing needs.
- 6.17. The SLP authorities are undertaking ongoing evidence in relation to ensuring appropriate densities are supported across the plan area and will be publishing a 'Density' Topic Paper in due course.

#### CHANGE PROMPTED BY REGULATION 18 RESPONSES

*The vision reflects the evidence in terms of utilising the best use of land by including a requirement to '**ensuring optimum densities**'.*

## *Sports and Recreation*

- 6.18. Respondents suggested including sport, play, and recreation provision in the infrastructure requirements, noting that current references focus on existing facilities rather than new ones. Concerns were raised about insufficient capacity for the projected population and the inefficiency of some existing facilities.
- 6.19. A proactive approach to identifying and safeguarding sport and activity hubs/centres in new developments was recommended, including both indoor and outdoor facilities. It was considered that the vision should highlight that growth can create opportunities for healthy lifestyles and inclusive access to sport and recreation. It was further highlighted that sport and recreational needs should be addressed in the masterplanning process for strategic development, identifying required hubs/centres on a site-by-site basis.

## *Greenfield Land Development*

- 6.20. Respondents suggested protecting land between villages from development and maintaining minimum separation distances. Other respondents highlighted potential in growing Service Villages into Rural Service Centres for increased sustainability. Concerns were raised about the vision's focus on brownfield development, suggesting it should also consider sustainable greenfield development.

### ***CHANGE PROMPTED BY REGULATION 18 RESPONSES***

*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.*

6.21. It was considered that the vision should set sustainability criteria for housing needs and be more spatially focused with specific outcomes for key locations. It was suggested that the vision should support both brownfield and greenfield development, large-scale new developments, and proportionate development at settlements, acknowledging the importance of locating growth areas where people can live, work, and access the countryside.

#### CHANGE PROMPTED BY REGULATION 18 RESPONSES

*There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.*

### *Spatial Strategy*

6.22. Respondents expressed concern about the vision's focus on large-scale urban development, suggesting it may neglect small-scale rural dispersal and lead to stagnation and closure of services. It was suggested that brownfield sites alone cannot achieve the vision's objectives and that there is a need to embrace all sustainable development opportunities.

6.23. It was recommended to include specific ambitious housing targets, along with preserving green spaces and farmland. It was suggested that the garden community at Ashchurch should be prioritised over other greenfield proposals, while some respondents view new settlements as high-risk and instead advocated for growth in existing settlements.

6.24. Concerns include reinforcing unpopular urban extensions, insufficient traveller locations in Cheltenham and the need for human-scale environmentally friendly development. Building on Gloucestershire Airport and standardising house designs to improve quality and reduce costs were also proposed.

6.25. It was considered that the strategy should address a combination of options and include smaller-scale extensions to settlements with the modelling of different population growth scenarios also suggested.

6.26. Respondents suggested acknowledging Gloucester and Cheltenham as major urban hubs with a wider catchment area beyond the SLP. They emphasized that

Stroud District's Vision to 2040 highlights its network of market towns, well connected to rural hinterlands and complementary to Gloucester and Cheltenham's roles as regional centers.

- 6.27. The SLP authorities are currently formulating the optimum development strategy as part of the wider plan-making process using the results of the Regulation 18 consultation and the evidence based studies that have been commissioned to inform this.

### *Housing / Employment / Other Needs*

- 6.28. Respondents suggest that the vision should emphasize meeting all identified needs, including employment, Gypsy and Traveller, leisure, education and places of worship. It was recommended to maintain five-year housing supply's and address key worker housing shortages.

#### ***CHANGES PROMPTED BY REGULATION 18 RESPONSES***

*There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.*

*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).*

- 6.29. It was stressed that the vision should be more aspirational, promoting sustainable housing development and addressing the most pressing needs, including smaller homes, affordable housing, and housing for older people. In addition, community-led developments and a balance between long-term and short-term housing were also encouraged.

6.30. It was recommended that the plan should address accommodation for an ageing population, provide a range of housing types, and give more weight to Neighbourhood Development Plans. Furthermore, it was suggested that the vision should aim for the highest quality of life by designing housing, infrastructure, and services to meet the needs of an ageing population.

#### ***CHANGES PROMPTED BY REGULATION 18 RESPONSES***

*There is now recognition within the vision to facilitate the optimum development strategy to deliver the full needs of the communities.*

*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).*

#### ***Scope of Vision***

6.31. Respondents suggested that the vision should focus more on the environment and nature recovery, with clearer definitions of terms like "Green Growth." The need for collaboration with partners and monitoring of objectives was emphasised and it was suggested that the vision should align with the Garden Communities principles and also consider adjacent areas.

6.32. Respondents recommended making the vision more concise and specific to Cheltenham, Gloucester, and Tewkesbury, avoiding generic terms. It was suggested that public safety and national defence should also be included. There was a suggestion that the vision and objectives should be treated as work in progress, tailored to district challenges, and clearly inform policies.

6.33. It was suggested that the vision be framed as a strategic land use document with a clear spatial remit, and the spatial ambition should be the foundation for all policies, highlighting key development proposals. It was further suggested that the vision should be based on achievable outcomes to support inward investment, addressing key challenges and aligning with sustainable development goals.

6.34. Respondents emphasised the importance of a strong economy being crucial for supporting healthy communities and a valued environment, suggesting that the

vision should mention both capital and revenue funding. It was suggested that the objectives need to be clear and focused, avoiding excessive detail, prioritising health, wellbeing and quality of life, with good transport links and sustainable economic development.

6.35. There were concerns that the vision needs a more rural focus with adaptability to future change.

#### **CHANGES PROMPTED BY REGULATION 18 RESPONSES**

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

*The vision now includes an individual section for **each council area** to recognise and appreciate their distinct character and challenges.*

*The wording of the vision is amended to ensure **that economic development of all sizes and types** are embraced.*

*The vision now references '**Working with our partners**' to facilitate the objectives.*

*References to **health and wellbeing** are more fully embedded into the vision and objectives.*

*Reference to putting '**placemaking**' at the heart of development' has been incorporated into the vision.*

*References to '**beautiful**' have been deleted from the vision and objectives.*

*The vision and objectives have been reorganised to ensure the interdependency of the **three components of sustainable development** is acknowledged.*

*Reference to the terminology '**green growth**' has been removed from the wording of the vision and objectives. Instead, the vision refers to '**growth without adverse environmental consequences**' and '**growth that is environmentally sustainable**' for clarification.*

## *General Supporting comments*

- 6.36. There was strong support for focusing on sustainable growth, addressing climate change, meeting housing needs and creating high-quality living environments in the vision. Using brownfield sites and releasing Green Belt land where necessary for housing was also generally supported, along with ensuring growth is backed by essential transport and infrastructure.
- 6.37. The vision was viewed positively for its future-focused outcomes and priorities, which align with addressing climate and ecological emergencies and its ambition to build strong, competitive and sustainable economies.
- 6.38. Support was also noted for aspects of the vision related to green growth, investment in skills, attracting a younger workforce, and providing flexible workspaces for a circular economy.
- 6.39. The supporting comments received have been noted.

## *Landscape*

- 6.40. Respondents were generally concerned that the vision's references to conserving landscapes and green spaces are not ambitious enough and do not align with national policies. It was suggested that it should explicitly mention the Cotswold's National Landscape (CNL) and its importance and recognise that large-scale renewable energy schemes in the CNL are seen as incompatible, and further that identifying suitable areas for renewable energy should be given priority over specific site allocations for this use.
- 6.41. It was highlighted that the aspiration should be to create a nature recovery network with sufficient quality and connectivity and should include expanding interconnected green spaces and waterways with greater attention given to protecting and enhancing green and natural spaces, including in the CNL

#### CHANGES PROMPTED BY REGULATION 18 RESPONSES

*Stronger reference to the CNL and its setting is incorporated within the vision and objectives given its importance in the local area.*

*Reference to the terminology 'green growth' has been removed from the wording of the vision and objectives. Instead, the vision refers to '**growth without adverse environmental consequences**' and '**growth that is environmentally sustainable**' for clarification.*

#### *Nature*

- 6.42. Respondents suggested enhancing the vision by explicitly mentioning nature recovery, biodiversity and safety for all users with the main concern being the environmental impact of proposals.
- 6.43. It was suggested that the vision should use clear language about nature recovery and biodiversity, and that it should highlight nature recovery as a key priority and include references to creating and extending habitats in Nature Recovery Network priority zones. It was further recommended that the strategic objectives should focus on protecting and enhancing natural environments, including urban areas and prioritise biodiversity.

#### CHANGES PROMPTED BY REGULATION 18 RESPONSES

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

*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.*

## *Town Centres*

- 6.44. Respondents were concerned that the vision doesn't focus enough on regenerating town centres as residential areas. It was considered that village centres also need support to stay viable, and development can help with this. It was suggested that the vision should include "village centres" alongside city and town centres.
- 6.45. It was recommended that the objectives support cultural events and a variety of uses, including new homes, to create active communities and that the uniqueness of different centres should be considered. There was also general support for the vision to recognize the need for town centres to evolve and adapt flexibly.
- 6.46. The SLP authorities are currently working on a 'Centres' Topic Paper that will evidence and inform the policy response that will be incorporated into the emerging SLP as well as helping ensure that measures are embedded into wider plan-making principles.
- 6.47. In addition, they are also commissioning a partial update to the existing Retail Study undertaken as part of the evidence base in relation to economic development in the area which will help inform the successful direction of the SLP centres futures.

### ***CHANGES PROMPTED BY REGULATION 18 RESPONSES***

*The vision has been strengthened to ensure that **flexibility to enable adaptation** to allow centres to respond to changes is fully embedded to ensure their future success.*

*Reference to **culture within the role of centres** has been embedded within the objectives.*

## *Protection of Farmland / Villages*

- 6.48. Respondents considered that the vision should include protecting and preserving high-quality farmland with emphasis placed on conserving rural areas, supporting countryside recreation and local food production.
- 6.49. There were concerns raised about the impact of major developments on small communities and the potential compromise of local services. In addition, building on Green Belt and flood plain land was seen as a threat to unique rural spaces.

#### **CHANGE PROMPTED BY REGULATION 18 RESPONSES**

*Reference to how brownfield land can be used to **protect the BMV soils across the plan area** is incorporated to strengthen this aspect.*

### *Flood Risk / Water Management*

- 6.50. Respondents were generally concerned about building on flood plains and there were suggestions to utilising a catchment approach to flood risk management, prioritizing natural flood management and green infrastructure.
- 6.51. It was suggested that the vision should address all forms of flood risk and consider the impact of development on flooding in other areas with the objectives recognising the interdependencies of different types of infrastructure. It was further suggested that active flood risk management and biodiversity enhancements should be integral to growth decisions.
- 6.52. The SLP authorities are currently commissioning a Strategic Flood Risk Assessment Level 1 that will analyse the most up-to-date flood risk information for all sources and provide an overview of flood risk issues across the SLP area.
- 6.53. Alongside this a Water Cycle Study is also being commissioned which will identify if the water infrastructure capacity could constrain growth and if there are any gaps in the evidence needed to make the assessment. These studies will be used as part of the SLP evidence base.

### CHANGES PROMPTED BY REGULATION 18 RESPONSES

*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.*

*The vision stresses that **by 2050 flooding will have been mitigated against** and will not pose a risk to the SLP area.*

## Culture / Heritage

- 6.54. Respondents suggested that the term "cultural offer" be replaced with a commitment to respect and enhance the areas built heritage, including support for local sports, outdoor activities, and community festivals.
- 6.55. It was suggested that the vision should harness the historic environment for tourism and heritage-led regeneration, especially in historic high streets and there were concerns raised about Cheltenham, Gloucester, and Tewkesbury merging into a 'megacity'.
- 6.56. It was recommended that the term "preserved" should be replaced with "conserved" to reflect the careful management of change.

### CHANGE PROMPTED BY REGULATION 18 RESPONSES

*References to 'preservation' have been replaced with 'conservation' to ensure the careful management of heritage assets is reflected.*

## Economy

- 6.57. Respondents considered that a broad range of new homes is essential for economic goals and that there needs to be a comprehensive look at future living, working, and playing patterns, including changes in jobs and transport.
- 6.58. It was suggested that the objectives should support home-based businesses and small start-up units with agricultural ecosystem development supported – from farm to table or other uses.

It was further recommended that the term "full fibre" should be replaced with "appropriate, modern" and that new housing sites should be located away from incompatible industrial sites for a sustainable environment.

6.59. The SLP authorities are currently commissioning an update to the Housing and Employment Needs Assessment (HENa) which will provide an updated assessment as to the quantity and type of employment land needed to inform the SLP.

#### ***CHANGES PROMPTED BY REGULATION 18 RESPONSES***

*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.*

*The wording of the vision is amended to ensure that **economic development of all sizes and types** are embraced.*

### *Green Belt*

6.60. Respondents considered that development should be focused on sites near major sustainable settlements and avoid the Green Belt unless absolutely necessary. Other comments suggested that the vision should address the need for managed release of Green Belt land to meet housing and job requirements, as some scenarios without Green Belt development won't provide enough homes and jobs. It was recommended that the vision links growth in sustainable locations to the potential release of Green Belt land, based on further assessments.

6.61. The SLP authorities are commissioning an imminent review of the Green Belt that will provide the necessary evidence to ensure that the government's ambitions for the Green Belt will be met and incorporated within the vision.

### *Affordable Housing*

6.62. Respondents considered that the vision should differentiate between affordable houses and genuinely affordable houses, especially for public service workers. There were concerns about second and holiday homes making housing unaffordable and affecting local employment. It was suggested that the vision explicitly addresses meeting identified needs for both market and affordable homes to reduce the affordability gap and ease pressure on the private rented

sector.

6.63. The vision has been strengthened to include reference to meeting housing needs in full. In addition, NPPF changes highlight a stronger focus on delivering affordable housing and gives LPAs more power to decide how much social housing and affordable houses to build, along with the number of 'First Homes'. These new provisions will be picked up in future iterations of corporate council plans and will feed into wider plan-making.

### *Green Infrastructure*

6.64. Respondents suggested that the vision should emphasize growing green infrastructure alongside housing and economic growth and that existing green spaces should be supported to handle increased visitor pressures.

6.65. It was suggested that the vision should ensure optimal outcomes for climate, nature, and transport, including developing Suitable Alternative Natural Greenspaces (SANGs) to manage recreational pressure and that reference to new housing developments should include accompanying green spaces.

#### ***CHANGE PROMPTED BY REGULATION 18 RESPONSES***

*References to **green infrastructure** are more fully embedded within both the vision and objectives.*

### *Biodiversity*

6.66. Respondents considered that the vision should prioritise the natural environment, clearly setting out environmental ambitions and opportunities with a strategic approach to protecting and enhancing the natural environment, including biodiversity net gain and connectivity improvements recommended.

6.67. It was suggested that growth should be in ecologically sustainable locations and that relevant linkages with various environmental plans and strategies should be included within the vision. It was further suggested that the biodiversity emergency should be given equal status to the climate emergency and that people's connection to nature should be prioritized for their wellbeing.

#### **CHANGE PROMPTED BY REGULATION 18 RESPONSES**

*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.*

## 7. Planning reform

- 7.1. The Government announced various reforms to the NPPF in December 2024 that were assessed to determine if they would impact on the draft vision and objectives.
- 7.2. The following amendments to the previous (2023) version of the NPPF are now in place:

### *Standard Method for Assessing Local Housing Need*

- 7.3. The NPPF, in paragraph 62, reinforces and updates the 'Standard Method' (way of calculating housing need) as the approach for determining local housing needs, replacing the previous opportunity for LPAs to use an alternative approach if they could demonstrate 'special circumstances'.
- 7.4. The updated method is based on housing stock and housing affordability and is in response to local affordability pressures – essentially increasing housing need in areas with the highest affordability pressures.
- 7.5. Strategic policies are now required to align with the housing needs identified using this method. The revised phrasing in paragraph 61 – "*meet an area's identified housing need*" puts additional pressure on LPAs to deliver more housing by effectively strengthening their housing delivery obligations.
- 7.6. In light of these changes the SLP authorities are using the revised standard method to calculate the areas needs in full.

### *Five-Year Housing Land Supply*

- 7.7. The 2024 NPPF revisions have reinstated the requirement for all LPAs to continually demonstrate a 5-year housing land supply (5YHLS), regardless of whether this is an up-to-date plan. This must include a 5% buffer or 20% if there has been significant under-delivery of housing over the previous three years.
- 7.8. The SLP authorities continue to undertake monitoring and update their 5YHLS positions through the publication of their respective Housing Land Supply Position Statements.

### *Green Belt & Grey Belt*

- 7.9. The updated NPPF advises LPAs to carry out Green Belt reviews if housing, commercial or other needs cannot be satisfied without modifying the boundaries.

Paragraph 148 introduces a sequential approach to guide Green Belt releases.

- 7.10. The NPPF introduces the concept of "Grey Belt" land. It stresses that for the purposes of plan-making and decision-making, Grey Belt is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 7.11. The three of the five purposes of Green Belt mentioned within the definition are:
  - a) *to check the unrestricted sprawl of large built-up areas;*
  - b) *to prevent neighbouring towns merging into one another;*
  - c) *to preserve the setting and special character of historic towns.*
- 7.12. Given the above definition, sites within the Green Belt comprising previously developed land and any other parcels and/or areas that make a limited contribution to the aim of the Green Belt but excluding areas or assets of particular importance (i.e. land with an existing environmental designation) could constitute Grey Belt.
- 7.13. The introduction of a new set of "golden rules" is also included to ensure that any major development on such land benefits both communities and nature.
- 7.14. It is clear that there will now be a requirement for LPAs to review their Green Belt. The SLP authorities recognise this requirement and are currently in the process of commissioning this workstream.

### *Local Character and Design Coding*

- 7.15. The revised NPPF removes references to "beauty" and "beautiful" from Chapter 12. Additionally, the previous paragraph 130, which allowed local character to influence housing capacity, has been removed. Furthermore, the definition of previously developed land has been broadened to include "*land which has been lawfully developed.*"

7.16. The future design coding work undertaken through the SLP will instead ensure that good, locally derived design will be embedded into plan-making.

#### ***CHANGES PROMPTED BY NPPF AMENDMENTS***

*References to '**beautiful**' have been deleted from the vision and objectives.*

*The vision reflects the evidence in terms of utilising the best use of land by including a requirement to '**ensuring optimum densities**'.*

### *Affordable Housing*

7.17. New provisions mandate that housing needs assessments explicitly address the need for social rent. Authorities must outline their expectations for social rent delivery as part of their affordable housing policies and must also now meet the needs of "looked after" children. There is also a push for mixed tenure development proposals, with strengthened policies for small sites, including a focus on what's essential for small and medium sized enterprise (SME) housebuilders to deliver new homes. Additionally, there is an emphasis on 50% affordable housing (subject to viability) for Green Belt sites.

7.18. These changes highlight a stronger focus on delivering affordable housing and gives LPAs more power to decide how much social housing and affordable houses to build, along with the number of 'First Homes'. These new provisions will be picked up in future iterations of corporate council plans and will feed into wider plan-making.

### *Supporting Economic Growth, Clean Energy, and Infrastructure*

7.19. The NPPF now prioritises provision for commercial development that support modern economies, such as laboratories, gigafactories, data centres, digital infrastructure, freight, and logistics. It also emphasises infrastructure upgrades, including grid connections for renewable energy. Additionally, it reintroduces onshore wind into the Nationally Significant Infrastructure Projects (NSIP) regime, with "significant weight" given to renewable energy proposals.

7.20. These changes are designed to foster economic growth and help achieve net-zero

targets, aligning with broader sustainability objectives and are already embedded into the vision.

7.21. The SLP authorities have published a two part Renewable Energy study, commissioned by CSE and LUC providing a detailed review of planning considerations related to climate change and renewable energy, a summary of the technical potential for renewable energy in the SLP area, and recommendations for next steps and further actions to support deployment of renewable and low carbon

#### **CHANGE PROMPTED BY NPPF AMENDMENTS**

*Reference to using a **vision-led approach** to prioritise genuine sustainable transport and active travel options have been incorporated within the objectives.*

energy sources.

### *Strategic Planning / Plan-making*

7.22. Paragraph 24 of the NPPF sees an increased requirement for the duty to cooperate between local authorities. There is a heightened requirement for strategic planning across LPA borders to address key spatial issues such as meeting housing need, delivering strategic infrastructure and building economic and climate resilience.

7.23. Paragraph 27 requires strategic policy-making authorities to ensure that their plan policies are consistent with those of other bodies that have a strategic relationship. This includes consistency with the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary.

7.24. These changes recognise the vital role that effective strategic planning across local planning authority boundaries play in delivering sustainable growth.

7.25. The updated NPPF provided updates to plan-making processes that implement the timing of Local Plans. This means the LPAs have until December 2026 to submit a Plan for examination under the current legislative framework. After this, a Plan will need to be made within the provisions of the Levelling Up and Regeneration Act 2023, with relevant provisions due to be brought into force in 2025.

7.26. The agreed joint approach set out in delivering the SLP means that we are already responding to this change. In addition, the SLP authorities are already working effectively with Gloucestershire County Council (GCC) and relevant infrastructure

providers to ensure that their respective strategic plans align. Cross boundary working with those LPAs that adjoin the SLP area is already embedded, and we will ensure that our evidence aligns with their respective strategic objectives and needs.

- 7.27. With regards to plan making and timings, a new consolidated and streamlined SLP timetable has been produced alongside a more iterative and flexible approach to community and stakeholder engagement to ensure the timely production of the SLP to allow the vision and objectives to be implemented through an adopted plan.
- 7.28. In addition, the SLP authorities are supporting the future development of [a Gloucestershire Strategic Plan](#), building on the agreed Gloucestershire Statement of Common Ground and its action plan. Within the context of the English devolution agenda set by Government at the end of 2024, developing a Gloucestershire Strategic Plan proactively takes forward the Government objectives around strategic planning, providing a clear route map for delivery by working collaboratively.

## *Education*

- 7.29. Paragraph 100 now requires that a sufficient choice of **early years**, school **and post-16 places** are available to meet the needs of existing and new communities.
- 7.30. Previously LPAs were only required to plan for 'school' places and therefore early years and post-16 education will now be factored into plan-making and hence the IDP.

## *Sustainable Transport*

- 7.31. Chapter 9 now gives significant emphasis to the importance of considering transport issues early in the planning and development process. It states that LPAs need to adopt a 'vision-led' approach to identifying transport issues.

## *Brownfield Land / Farmland*

- 7.32. Paragraph 125 c) gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.
- 7.33. In terms of agricultural land, footnote 65 makes clear that were significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

7.34. This approach fits in with the vision that requires substantial weight be given to a brownfield first approach, and that highest quality agricultural land will be preserved.

## 8. Corporate Objectives

8.1. It is important to ensure that the vision reflects locally important strategic objectives set out within published corporate documents for each LPA. Some of the aims and objectives within council plans contain components within the remit of the SLP. The following documents have been assessed to ascertain that the new vision and objectives align with their main principles:

### *Tewkesbury Borough Council (TBC) Council Plan*

8.2. Tewkesbury's Council Plan<sup>8</sup>, covering the period 2024 – 2030 introduces new priorities and focus areas, which are all underpinned by a new vision: 'Supporting People, Strengthening Communities'. It contains three priority areas which are:

- *Caring for people*
- *Caring for the environment*
- *Caring for place*

8.3. Alongside the three priority areas, the plan identifies eight focus areas including the climate and ecological emergency, young people, the economy and flood resilience. Within this plan TBC set out their aspirations for these areas of focus with clear actions on what they want to do to make a difference and have a positive impact on the area.

8.4. TBC declared a Climate Emergency in 2019 and in May 2023, the scope of the declaration was extended to include a borough-wide Climate and Ecological Emergency. This commits TBC to take urgent action to address the causes of climate change across the borough and do all in their power to make the Borough carbon neutral by 2030. One of the actions arising from this is to develop an evidence base on climate and ecological sustainability to inform the development of future planning policy. This evidence is anticipated and will be used to shape the SLP going forward.

8.5. Tewkesbury's geographical setting means that the Borough is prone to flooding and therefore 'Flood Resilience' is another area of focus. Accordingly, TBC have reflected the need to commission a Strategic Flood Risk Assessment Level 1 as a specific action within their plan. This is being completed through the SLP as part of the wider evidence base

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<sup>8</sup> [Council Plan 2024-2030 – Tewkesbury Borough Council](#)

- 8.6. 'Place' is another area of focus for the council. This is a focus on recognising and valuing the distinctiveness of the different communities that make up the borough. As part of this TBC are committed to creating 'place plans'. These will highlight key issues and projects by engaging with local communities on their infrastructure needs and ensuring they are connected to any planned growth. The aim is for the place plans to feed into the SLP to help ensure that any housing growth is accompanied by the appropriate infrastructure.
- 8.7. The plan's focus on 'Managing growth' is concerned with planning for the building of new homes, through the SLP, rather than letting development take place in an ad hoc manner. The 'Managing Growth' focus highlights the importance of ensuring that the necessary infrastructure is secured to support the growth requirements. One of the actions is to work with providers to prepare an Infrastructure Delivery Plan, as part of the evidence base that informs the preparation of the SLP and to support both the SLP and the Garden Communities Charter that concerns the new Tewkesbury Garden Community.
- 8.8. 'Housing and homelessness' is a further area of focus for TBC's plan with preventing and resolving homelessness a key part of this. TBC recognise the importance of affordable housing and one of the actions is to identify housing needs across the borough through the SLP. It is considered that a community-led approach will help identify potential sites. TBC will seek to increase numbers of affordable houses, provide options in areas less likely to see wider development and explore options for the council to begin to deliver affordable housing on their brownfield land.
- 8.9. 'Economy' is another area of focus for the council and is concerned with a commitment to support businesses in the borough to grow and encourage investment in the local economy, ensuring the right infrastructure and skills are in place to attract new investment and retain and strengthen existing businesses. TBC consider that the SLP will help facilitate this and ensure the needs of local businesses are met, aiding economic growth and sustainability. There is an action included to commission an Employment Land Use Study to inform the development of future planning policy and to work with partners to promote the growth of key sectors, including: advanced engineering and manufacturing, agri- tech and aerospace.
- 8.10. The plan's focus on 'Young people' is concerned with recognising that they are essential to local communities and the future of the borough which will help ensure that the SLP will be shaped to meet the needs of young people in the future.
- 8.11. 'Health and wellbeing' is another area of focus in recognition of the huge role TBC play in ensuring their communities are robust, healthy and thriving places to live.

One of the actions relating to this area of focus is to work with the Integrated Care Board (ICB), Integrated Locality Partnership (ILP) and local communities to ensure that health and wellbeing strategies inform the development of future planning policies. A further action is to develop a health and wellbeing strategy and action plan to address health inequalities, and this will feed into the SLP.

#### **CHANGES PROMPTED BY TBC COUNCIL PLAN**

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

*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.*

*Reference to putting '**placemaking**' at the heart of **development**' has been incorporated into the vision.*

*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.*

*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).*

*References to **health and wellbeing** are more fully embedded into the vision and objectives.*

## *Cheltenham Borough Council (TBC) Council Plan*

8.12. Cheltenham's Council Plan<sup>9</sup>, covering the period 2023 – 2027 supports five principles including:

- *Key Priority 1 – Enhance Cheltenham's reputation as the cyber capital of the UK;*
- *Key Priority 2 – Working with residents, communities and businesses to help make Cheltenham net zero by 2030;*
- *Key Priority 3 – Increasing the number of affordable homes through our – £180m housing investment plan;*
- *Key Priority 4 – Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity; and*
- *Key Priority 5 – Being a more modern, efficient and financially sustainable council.*

8.13. CBC highlight that Key priority 1 is to be met through the Golden Valley Development, which is a pioneering garden community integrating hi-tech business, residential and leisure uses with the National Cyber Innovation Centre at its heart.

8.14. CBC declared a climate emergency in February 2019 and since this date have been working towards meeting the aim to help make Cheltenham net zero by 2030 through their Climate Emergency Action Plan 'Pathway to Net Zero', published in 2022 and updated in 2024. This is the basis for key priority 2. One of the actions being implemented is the new Climate Impact Assessment Tool being used to ensure that the council are appropriately considering climate factors in all its decisions. In addition, they are working to embed their Climate Change Supplementary Planning Document (adopted in 2022) into the decision-making process.

8.15. Key priority 3 will be met through CBC's £180m housing investment plan from which £35m has already been spent delivering 136 homes. They state that they will continue to take a 'fabric-first' approach with improvements to existing homes, ensuring they are as energy efficient as possible. In meeting this priority, they also aim to enable development and regeneration opportunities to support more town centre living.

8.16. Key priority 4 is centred on the economy with the aim to ensure residents, communities and businesses benefit from Cheltenham's future growth and

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<sup>9</sup> [Our corporate plan | Cheltenham Borough Council](#)

prosperity. CBC state that Cheltenham will see huge investment over the coming years through expansion of the cyber industry, more affordable homes and infrastructure which is tied in with the preceding priorities. There are a range of supporting actions that will help meet this priority. The SLP vision must reflect these aims in terms of providing the basis for which CBC can identify and drive opportunities in all aspects of economic development. Tied in with this priority are actions to develop a Sports Strategy and a Heritage Strategy that can feed into the SLP.

- 8.17. CBC highlight that key priority 5 concerns being a more modern, efficient and financially sustainable council and the aim is to continue to identify opportunities to increase income and reduce costs to ensure financial sustainability. As part of this one of the goals is to develop a car parking strategy with the aim of bringing travel change to Cheltenham and looking at regeneration opportunities.

## CHANGES PROMPTED BY CBC CORPORATE PLAN

*The vision has been altered to ensure climate change is fully embedded with clear ambition to reach **carbon neutral status by 2030** and to **fully rely on renewable energy for power by 2050**.*

*The wording of the objectives has been amended to refer to fostering economic growth that is environmentally sustainable.*

*The vision has been amended to refer specifically to **regeneration** in making the best possible use of land.*

*The vision has been strengthened to ensure that flexibility to enable adaptation to allow **centres to respond to changes** is fully embedded to ensure their future success.*

*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.*

*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).*

## Gloucester City Council (GCC)

8.18. Gloucester City's Corporate Plan<sup>10</sup>, covering the period 2025-2028 includes an overarching vision which is 'Putting the heart back into Gloucester'. This vision is driven by the council's key objectives to:

- Strengthen civic pride;
- Build more affordable homes;
- Deliver a zero-carbon council;

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<sup>10</sup> [Appendix 1 Draft Corporate Plan 2025-28 for Consultation.pdf](#)

- Improve the biodiversity of parks and open spaces;
- Transform Council services;
- Deliver regeneration and
- Make the city an exciting and attractive place to live and visit.

8.19. The priorities that set out how this will be achieved are:

1. A vibrant and attractive city that celebrates Gloucester's unique heritage.
2. Inclusive, thriving communities and residents that feel safe, supported and valued.
3. An innovative and accountable council focused on providing sustainable, high quality, accessible services and facilities.

8.20. The first priority includes actions for the council to complete construction on The Forum in accordance with the project plan, develop masterplans for key sites, including Greyfriars, the Eastgate Quarter and the Northgate area of the city and to bring forward housing development at Whitefriars, St Oswalds, Wessex House and Spread Eagle Court.

8.21. It also seeks to determine Gloucestershire Airport's long-term future and safeguard employment at the site, create job opportunities for graduates and support economic growth within the city and to create employment and skills opportunities from new major developments for local residents.

8.22. Further actions include growing the arts, culture and heritage sectors that are already well-established, improving public amenities and introducing design standards to protect and enhance the built environment.

8.23. The second priority includes actions for the provision of suitable, affordable, energy efficient housing and tackling homelessness. It also seeks to control introduce stronger mechanisms to control the proliferation of Houses in Multiple Occupation.

8.24. It also includes a series of actions to create a safer environment for everyone who lives in and visits Gloucester and improve the health and wellbeing of all residents.

8.25. The third priority is focused on transforming and strengthening council services with actions that include delivering increased income from the council's commercial assets, including its property portfolio and strengthening the planning enforcement provision.

8.26. It also includes a focus on biodiversity with actions to plant more trees across the city and improve the biodiversity of the parks and open spaces. As part of this there

is an action to develop a Play Strategy and transform undeveloped land along the River Severn.

8.27. As part of their commitment to a zero-carbon Council by 2030 there are actions within this priority to install solar panels at the GL1 leisure centre and explore further renewable energy opportunities. Actions also include installing more Electric Vehicle (EV) charging points and promoting active travel choices by delivering the recommendations of the Green Travel Plan.

#### **CHANGES PROMPTED BY GCC CORPORATE PLAN**

*The vision has been altered to ensure climate change is fully embedded with clear ambition to reach **carbon neutral status by 2030** and to **fully rely on renewable energy for power by 2050**.*

*Stronger references to **the importance of conservation and enhancement of cultural heritage and the historic environment** have been included.*

*More reference to **community safety** is incorporated to help ensure that the area is safe for all residents going forward.*

*The vision has been amended to specifically reference that there will be no **homelessness** by 2050.*

*The vision has been strengthened to ensure that flexibility to enable adaptation to allow **centres to respond to changes** is fully embedded to ensure their future success.*

*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.*

*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).*

*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.*

*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**.*

8.28. It is considered that the visions focus aligns with the 3 corporate plans overall objectives. This is pertinent for climate change mitigation, meeting housing needs in full, including the provision of both affordable housing and employment opportunities. There is enough flexibility within the text to enable other actions within the remit of the SLP to be supported through the objectives, for example promoting health and wellbeing, supporting open spaces and biodiversity, facilitating sustainable travel and supporting regeneration opportunities. In addition, there are many streams of work arising from the corporate actions that will positively feed into the SLP process to enable a wide and shared evidence base.

## 9. Conclusions and next steps

- 9.1. The Proposed Vision and Strategic Objectives set out in this topic paper are considered to represent a more succinct, measurable and ambitious foundation upon which to base the SLP policies, shaped by objectives that contribute towards the three strands of sustainable development. Once the policies are subsequently successfully implemented the future state of the SLP area described by the vision can be achieved. It will continue to evolve as the SLP develops, building on comments arising from ongoing engagement, the evidence base that will support the SLP and focused input from key stakeholders.
- 9.2. The next step is to publish this paper for further comment and input in December 2025 which will help frame and develop other key matters to ensure that the plan is holistic and ultimately effective. This further engagement will continue to regulation 19 submission stage. In summer 2026 If you would like to be involved in the next stage of the process please join the planning policy database [here](#).