Strategic & Local Plan
Cheltenham, Gloucester & Tewkesbury

Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan

Regulation 18 Statement of Consultation and Engagement

CHELTENHAM BOROUGH COUNCIL

Gloucester City Council
Transforming Your City

Tewkesbury Borough Council

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1. Introduction and purpose

1.1. This Statement of Consultation and Engagement has been prepared to accompany the publication of the Strategic and Local Plan (SLP) under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The SLP has been prepared jointly by Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council (the SLP authorities).

1.2. The purpose of this statement is to set out the consultation and engagement undertaken throughout the preparation of the SLP and to explain how the views of communities, businesses, infrastructure providers, statutory consultees, elected Members, Town and Parish Councils, landowners, developers and other stakeholders have informed the development of the Plan.

1.3. The statement demonstrates compliance with the adopted Statements of Community Involvement of the three SLP authorities and summarises: a) who has been engaged in the preparation of the SLP; b) the methods of consultation and engagement undertaken; c) the principal issues raised by participants; d) how those issues have influenced the development of the Plan; and e) the consultation and engagement activities undertaken at each stage of plan preparation.

1.4. The preparation of the SLP has involved an iterative process of evidence gathering, stakeholder engagement, plan preparation and consultation. This statement focuses primarily on the consultation and engagement undertaken during the Regulation 18 stages of plan preparation, and how the feedback received has informed the Regulation 19 version of the Plan.

1.5. Figure 1 illustrates the relationship between the various consultation reports prepared during the plan-making process and the role of this Statement of Consultation and Engagement within that wider framework.

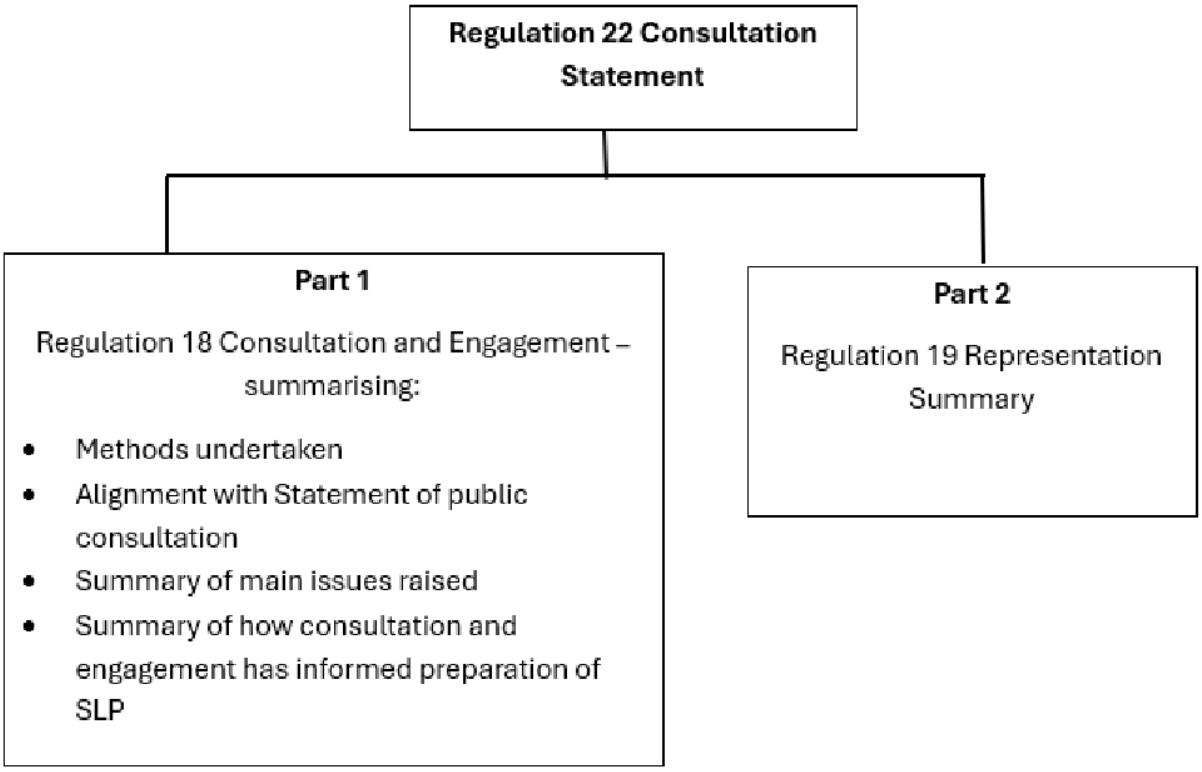


Figure 1: Diagram showing structure of local plan consultation reports

1.6. Regulation 19 represents a formal Publication stage rather than a further consultation on the content of the Plan. Representations are invited on whether the SLP has been prepared in accordance with legal and procedural requirements and whether it is sound. These representations will be submitted alongside the Plan and considered through the independent examination process.

1.7. Following completion of the Regulation 19 publication period, this statement will be updated in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The updated document will include a summary of the representations received and explain how those representations have been taken into account through the submission and examination stages.

2. Evidence base

2.1. The evidence base is a critical component of the SLP, underpinning the preparation of a sound and legally compliant development plan. While the National Planning Policy Framework (NPPF) emphasises that evidence should be proportionate to the issues being addressed, the scale, complexity and diversity of the SLP area have required a comprehensive programme of evidence gathering, analysis and assessment. This evidence has been used to understand current conditions, identify future needs, evaluate reasonable alternatives, and test the deliverability of the Plan's proposed strategy, while reflecting the area's varied opportunities, constraints and characteristics, including its economic role, environmental assets, settlement pattern and infrastructure requirements.

2.2. Key areas of evidence include:

a. Assessments of housing, employment and retail need to understand the scale and type of development required to support residents, communities and businesses over the plan period
b. Analysis of environmental and physical constraints, including landscape, biodiversity, flood risk, heritage assets, water supply, wastewater treatment capacity, Green Belt and Grey Belt considerations
c. Assessment of potential development sites through each authority's Housing and Economic Land Availability Assessment (HELAA), using a consistent methodology across the plan area to consider site suitability, availability, achievability and deliverability. The HELAA provides the starting point for identifying and assessing potential site allocations within the Plan
d. Transport, infrastructure and service capacity assessments to understand the implications of growth and identify the investment required to support development
e. Preparation of the Infrastructure Delivery Plan (IDP), which considers the infrastructure necessary to support both the overall scale of development proposed and the specific locations identified for growth, including education,

healthcare, transport, utilities, community facilities, green infrastructure and other essential services; and

f. Viability and deliverability assessments to ensure that the Plan's policies and site allocations can realistically be implemented over the plan period

2.3. Collectively, this evidence has informed the development of the spatial strategy, the identification of site allocations and the drafting of policies. It has also been used to test alternative approaches and ensure that the Regulation 19 SLP represents the most appropriate strategy for meeting identified development needs in a sustainable and deliverable manner.

2.4. A range of evidence base documents support the SLP. A summary of the evidence base is provided at Appendix 1.

3. Approach to consultation and engagement

3.1. Consultation and engagement have been undertaken throughout the preparation of the SLP in accordance with the adopted Statements of Community Involvement (SCI) of each of the SLP authorities. The SCI sets out how communities and stakeholders will be engaged in planning matters, including local plans. These are kept under review and were last updated by each of the authorities in summer 20261.

3.2. Consultation and engagement activities have been designed and delivered having regard to the requirements of the principles set out in the SCIs, using a wider range of consultation methods. Opportunities to participate and help shape the SLP were provided using a range of online and in-person engagement methods designed to reach residents, businesses, community organisations, statutory consultees, infrastructure providers and other interested parties.

3.3. Consultation and engagement included:

a. **Phase 1: Spatial options and key policy areas:** A wide ranging consultation, framed around 31 key questions, covering matters such as vision and objectives, the amount of development and how this could be delivered in the most sustainable way, and key policy areas such as climate change and infrastructure. This was supported by a range of in person and online events, and targeted consultation with young people, as a group that is harder to reach in planning consultations;
b. **Phase 2 – Topic-based engagement:** Engagement around specific topic paper and evidence studies, primarily undertaken through the consultation portal;

[1] Cheltenham Borough Council Statement of Community Involvement
Gloucester City Council Statement of Community Involvement
Tewkesbury Borough Council Statement of Community Involvement

c. **Targeted engagement:** with statutory consultees, key stakeholders, (such as infrastructure providers), harder to reach groups, and Town and Parish Councils;
d. An ongoing programme of engagement with **elected Members**;
e. Engagement with **neighbouring authorities and prescribed bodies** in support of effective cooperation; and
f. Engagement with **developers and site promoters**, particularly around the delivery of site opportunities.

3.1. Phase 1: Spatial options and key policy areas

3.4. The 'Spatial options and key policy areas' consultation sought responses to 31 questions covering matters such as growth distribution, housing, employment, climate change, nature recovery, infrastructure, transport, heritage and place-making. Consultation was undertaken for eight weeks, between 16th January and 13th March 2024.

3.5. Alongside this, the councils consulted on a new methodology for the Housing and Economic Land Availability Assessment (HELAA). The HELAA assesses the potential of sites to accommodate a range of development types, including housing, employment uses, and traveller pitches and plots. The consultation focused on introducing a single methodology to be applied consistently across the SLP area, replacing the separate approaches previously used by each authority and providing a more consistent basis for site assessment.

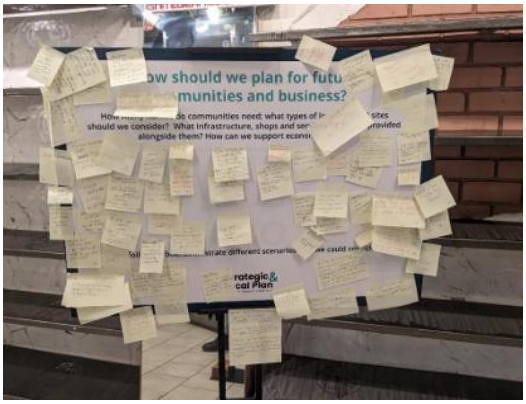
Consultation events

3.6. The Regulation 18 consultation was supported by a comprehensive programme of in-person and online events, designed to maximise participation from residents, businesses, community organisations, elected members, statutory consultees and other stakeholders. A combination of face-to-face and digital engagement opportunities was provided to ensure that people could participate in a manner that best suited their individual circumstances, preferences and interests. In-person events enabled direct discussion with the SLP team and immediate feedback, whilst online events allowed participants to engage remotely from across the plan area. This approach was complemented by a

dedicated interactive consultation platform, through which participants could access consultation materials, respond to questionnaires, complete polls, submit ideas, comment on consultation documents and register for engagement events.

In-person events

3.7. A total of seven in-person events were held across the SLP area. Two each were held in Gloucester City Centre and Cheltenham Town Centre, as the two biggest settlements in the area. The events were held on a weekday and weekend, to engage with people using the centres for different purposes, for example work or shopping. Other events were held in Tewkesbury Town Centre, and at community centres in Winchcombe and Churchdown. Locations were selected to provide a broad geographical spread and to maximise accessibility for local people. The events featured a range of exhibition material explaining the purpose of the consultation, the challenges and opportunities facing the area, and potential approaches to future growth. Officers were available throughout to discuss the consultation material, answer questions and provide additional information. Attendees were encouraged to provide feedback directly through interactive consultation boards. Leaflets were provided, with a link and QR code to the online consultation portal, to find out more and to respond in more detail in their own time. The events further provided the opportunity to publicise other in person and online events and encourage further engagement. Overall, The events were very well attended, with direct engagement with more than 500 people.







Online events

3.8. In-person events were complemented by a programme of online engagement workshops. A total of 12 online workshops were held, two each framed around six consultation themes:

- Vision and objectives;
- Growth scenarios;
- Housing and local services;
- Climate and nature;
- Business and jobs; and
- Improving our city, town and village centres.

3.9. Each workshop included a presentation from members of team, including an introduction to the SLP consultation, followed by further detail around that particular theme. There was then an opportunity for questions, answers and a discussion.

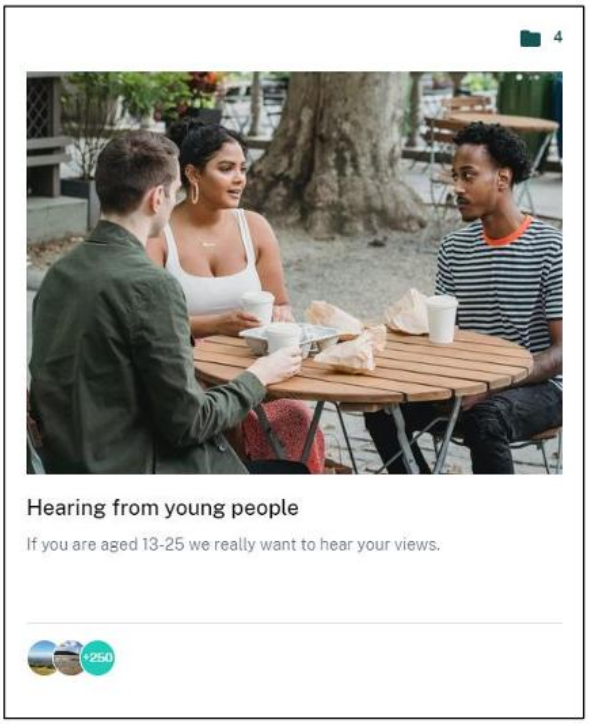
3.10. The online workshops were held at different times of the day, during the day and evening, to provide choice and flexibility, and ensure engagement opportunities were available to the widest audience possible. In total, the online events attracted 87 participants, complementing the extensive programme of in-person engagement undertaken across the SLP area.

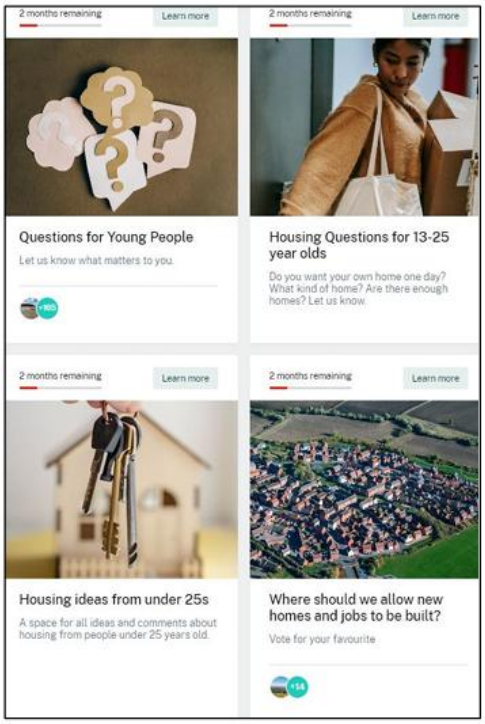
3.11. Recognising the important role that town and parish councils play in communicating with local communities, all were directly notified of the consultation and were invited to participate. A dedicated town and parish council briefing event was held at Stoke Orchard Community Centre on 31 January 2024 and was attended by 37 representatives from 27 councils. The event provided an opportunity for officers to explain the purpose of the consultation, answer questions and encourage local councils to both participate in, and promote, the consultation within their communities. Additional engagement meetings with individual town and parish councils were also held where requested.

Engagement with young people

3.12. Young people are traditionally one of the more difficult groups to engage in the plan-making process. However, as a group whose future opportunities will be significantly influenced by the implications of the Plan, such as housing and employment opportunities, the SLP authorities recognised it was essential their views helped inform the preparation of the Plan. Elected Members identified engagement with young people as a key priority for the SLP.

3.13. To ensure that younger residents could play an active role in shaping the SLP, the councils developed a dedicated programme of youth engagement. A bespoke 'Hearing from Young People' theme was established on the consultation platform, with content designed specifically for younger audiences.





3.14. The engagement focused on topics likely to have the greatest impact on young people's futures, including housing, employment, transport, climate change and the character of future communities. A range of interactive activities encouraged participants to share ideas, identify priorities and explore options for the location of future homes and jobs. It included:

a) Specific questions, designed by young people, aimed at people aged 13-25 on housing and future living aspirations;
b) Opportunities for young people to submit ideas and comments on housing;
c) Interactive voting exercises on where new homes and jobs should be located;
d) Dedicated opportunities for young people to identify issues and priorities for the future of the area; and
e) A youth engagement workshop.

3.15. The design and delivery of the engagement programme was informed by specialist youth engagement expertise. Advice was sought from Cheltenham's 'No Child Left Behind' programme to ensure the language, format and

communication methods were appropriate for younger audiences, while Gloucester City Council's Young Engagement Officer played a leading role in developing and delivering the consultation. Young people were directly involved in shaping elements of the engagement, including the development of consultation questions and the creation of short videos highlighting the issues they considered most important to the future development of the area. This peer-led approach helped make the consultation more relatable and accessible.





3.16. To further encourage engagement, young people were commissioned to prepare short videos setting out the sorts of things that were important to them regarding the future development of their area. The Youth Engagement Officer hosted various events and visited a series of schools and other youth projects to engage with as many young people as possible. A second year Human Geography student at the University of Gloucestershire undertook a 12-week work experience placement to support the work of the Youth Engagement Officer.

3.17. The programme generated a significant level of participation and represented the most successful youth engagement exercise undertaken by the SLP authorities in relation to planning policy. A total of 166 young people responded to the dedicated questionnaire, with a further 73 providing responses to

additional housing-focused questions and 15 participating in an exercise considering alternative development scenarios. The feedback received provided valuable insights into the priorities and aspirations of younger residents and has helped inform the preparation of the Regulation 19 SLP. Full details of the engagement activities and responses received are set out in Appendix X.

Consultation outcomes

3.18. A consultation report was published in January 2025, which summarises the key messages from the consultation. It is accompanied by a more detailed analysis of each consultation method, as set out below:

- Questionnaire
- Young people
- In person events
- Online workshops
- Sites

3.19. These are provided as Appendix 4 of this report.

3.20. Details of how these outcomes fed into and influenced the SLP are summarised as part of Section 4 of this report.

3.2. Phase 2: Topic based engagement

3.21. Between December 2025 and June 2026, a range of topic papers and emerging evidence studies were published on the SLP website / consultation portal, with views of residents, businesses, visitors and stakeholders sought. Hard copies were also available in each of the council's reception areas.

3.22. Topic papers published were:

a) **Vision and objectives**
Set out a draft vision and strategic objectives for the SLP, along with feedback for how it has been refined following previous Regulation 18 consultation responses (2024), and changes to national planning policy and corporate priorities of the SLP authorities.

b) **Spatial options**
Sets out how the councils have explored alternative approaches to distributing growth requirements across the SLP area. It drew on evidence around matters such as housing and employment needs, urban capacity, transport connectivity and development opportunities. The topic paper identified four reasonable spatial options capable of meeting the area's development requirements and explains the implications of each.

c) **City, Town and Local Centres**
Provides an assessment of the current performance, function and future role of centres across the SLP area. Drawing on national policy, local evidence and consultation feedback, it examines the challenges facing centres and identifies opportunities to strengthen them through regeneration, mixed-use development, enhanced public realm, sustainable transport and increased residential activity.

d) **Settlement Hierarchy**
Provides an updated assessment of the role, function and relative sustainability of settlements across the SLP area. Using evidence on population, service provision, transport accessibility and settlement characteristics, the paper establishes an emerging hierarchy of settlements to help inform the distribution of future growth

and the preparation of plan policies. It explains how settlements have been evaluated and grouped according to their existing facilities and accessibility, creating an important element of the evidence base that will support the SLPs spatial strategy.

e) **Housing density**

Provides the evidence base to help ensure that the best possible use is made of development sites, in a way that is responsive to local character. Drawing on national planning policy, design guidance, local examples and wider research, the topic paper demonstrates how higher-density development can contribute to meeting housing needs, supporting sustainable transport and infrastructure, and reducing pressure on undeveloped land, whilst maintaining high standards of design and placemaking. The paper establishes updated density assumptions for the SLP which will inform future site assessments, capacity calculations and policy development.

f) **Residential above shops**

This paper examines the potential to increase housing delivery by bringing vacant or underused upper floors above commercial premises back into residential use. It considers national policy, local evidence and consultation feedback, highlighting both the opportunities and challenges of this approach. The paper concludes that a positive policy framework can help unlock additional housing, support town centre regeneration and make better use of existing buildings in the SLP area.

3.23. Evidence document published alongside were:

a) **Housing and Employment Land Availability Assessment (HELAA)**

The HELAA is an evidence base that assesses site opportunities against a methodology to determine the potential for different forms of development. This engagement opportunity sought feedback on a revised draft methodology, following earlier consultation, to be used consistently across the SLP area, and published alongside site assessments undertaken against that methodology. It

was also a further targeted opportunity for sites to be submitted for consideration.

b) **Retail and Town Centres Study – Part 1**

This evidence reviews the retail, leisure and commercial position across the Strategic and Local Plan area. It examines recent trends and the performance of centres in Gloucester, Cheltenham and Tewkesbury, including how people use them and spend money. The findings provide evidence to support future town centre, retail and commercial planning policies.

c) **Urban Capacity Studies**

The Urban Capacity Studies (UCS)assessed the potential for new housing within the existing urban areas of Cheltenham, Gloucester and Tewkesbury Town. It identifies opportunities on brownfield and redevelopment sites and establishes how much growth could be accommodated within existing settlements. It is supported by the separate 'Housing Density' study, which aims to make the best use of sites. The UCS demonstrate that whilst housing growth can be accommodated within the existing urban area, additional land elsewhere would be required to meet future housing needs in full.

3.24. In addition, feedback was sought on a SLP-wide **Design Code** in terms of what it should contain and what it should say. The early public engagement exercise was undertaken at the end of 2025 as part of the preparation of the SLP Design Code to understand local priorities for the design of new development. The consultation sought views on what creates attractive places, local character and identity, green spaces and nature, walkable and connected neighbourhoods, housing quality and layout, community facilities and social spaces, and the long-term maintenance and stewardship of development. Respondents consistently highlighted the importance of distinctive places that reflect local character, are well connected, incorporate high-quality green infrastructure, and provide attractive environments in which people can live, work and spend time.

3.25. To support the engagement, a series of short films featuring leading industry experts were produced to support the 2025/26 consultation programme, helping to explain and demystify complex technical issues for a wider audience.

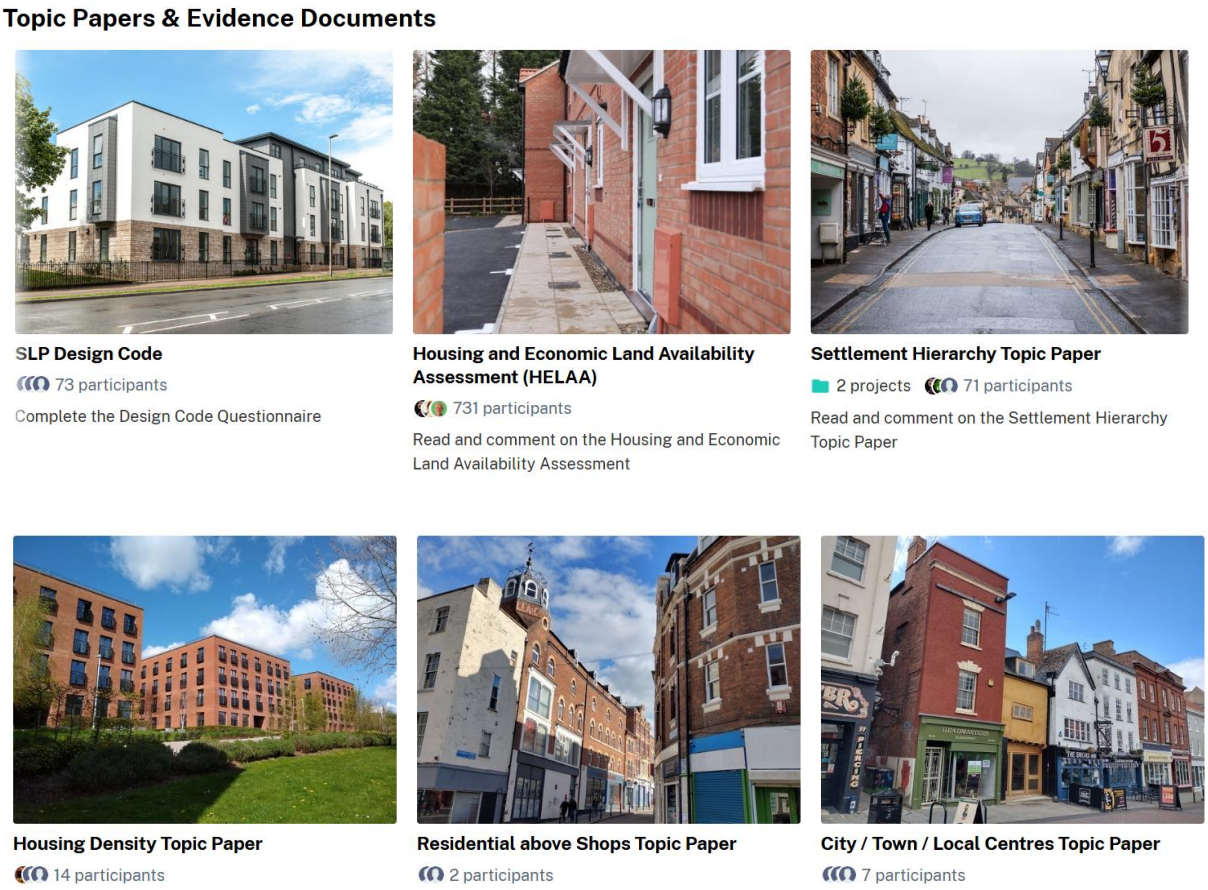


Figure 2: Images of 'Topic Papers & Evidence Documents' on the SLP consultation platform

3.26. A workbook of all responses received through Phase 2 engagement, and a summary of the views expressed, are provided at Appendix 5.

3.3. Communications and awareness raising

3.27. The Regulation 18 consultation and engagement activities was supported by a comprehensive communications and awareness-raising programme designed to maximise participation across the SLP area. Information was disseminated through a variety of channels, including:

a) Direct notification via the SLP database

The SLP database was refreshed at the beginning of the plan-making process and includes statutory and non-statutory consultees, local interest groups and members of the public who have requested updates on SLP matters. During the consultation, information was circulated directly to contacts on the database, with opportunities for additional parties to join or leave the mailing list through the SLP website.

b) Websites

Consultation materials, supporting evidence, consultation questions and details of engagement events were published on the SLP websites, providing a central source of information throughout the consultation period. Links were also provided from each SLP authority's website.

c) Press releases and media activity

A series of press releases were issued during the consultation period to promote awareness of the SLP, explain the issues under consideration and encourage participation. These communications directed residents, businesses and other stakeholders to the consultation material and engagement opportunities.

d) Social media communications

A programme of social media activity supported the consultation, including short videos featuring the Senior Responsible Owner for the SLP, Council Leaders and subject specialists. These communications sought to explain key issues in an accessible way, promote engagement opportunities and encourage participation from a broad audience.

e) Local networks and partner organisations

Elected members, parish and town councils, community organisations and wider stakeholder networks were encouraged to share consultation information through their own communication channels. Existing council and partner networks were also utilised wherever possible to extend the reach of the consultation and ensure that a broad cross-section of communities.

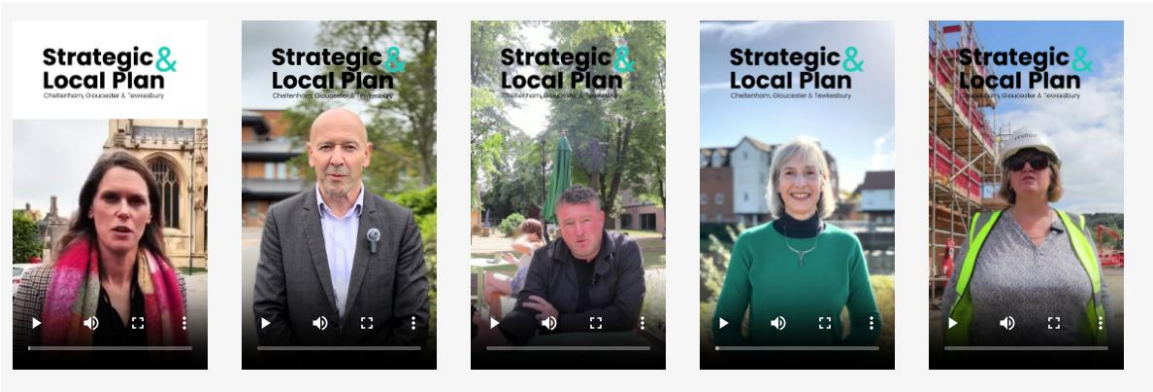


Figure 3: Images of social media videos

3.28. Further information in relation to communications and awareness raising as part of Phase 1 and Phase 2 consultation And engagement is provided at Appendix 4 and Appendix 5.

3.4. Inclusive consultation and engagement

3.29. The SLP authorities are committed to making consultation and engagement activities as inclusive as possible. The SLP consultation portal is hosted by 'Go Vocal', which was selected in part due to its strong accessibility credentials. The platform is designed to meet important accessibility standards[2] and incorporates features such as keyboard navigation, screen reader compatibility, alternative text for images, clear form labelling and appropriate colour contrast. These features help ensure that consultation content and response mechanisms are accessible to people with a range of disabilities and access needs. The platform is regularly reviewed and independently audited for accessibility, supporting the Councils' objective of enabling the widest possible participation in the preparation of the Strategic and Local Plan.

3.30. In recognising that people have different preferences, circumstances and requirements when engaging with plan-making, a combination of in-person and online engagement opportunities was provided, enabling participants to access information and discuss proposals with the SLP team in a manner, location and format that best suited their needs. In-person events were held at a range of venues distributed across the SLP area. Online events enabled residents, businesses and other stakeholders to participate remotely where attendance at a physical event was not possible or convenient.

3.31. Consultation materials were made available through the SLP website and in hard copy in each of the council's reception areas. Libraries were notified of the consultation and provided instructions on how people could access the consultation, and asked to make this available to the general public.

3.32. The consultation portal provides translation into three different languages, and other language translations are available on request. Large-print versions of consultation materials were also made available on request. Collectively, these measures were intended to reduce barriers to participation and ensure that all sections of the community had a reasonable opportunity to engage with the preparation of the SLP.

[2] WCAG 2.2 AA

3.33. As part of the SLP, specific efforts have been made to reach 'harder to reach groups' i.e. those that do not traditionally engage in planning consultations. This includes ensuring the representative bodies are included on our consultation database and notified of the opportunity to engage. In addition, specific efforts have been made to engage those groups where it was considered appropriate given the sorts of issues the SLP will address. This has included younger people in relation to all matters relating to the SLP (see elsewhere in this statement); a disability forum, primarily in the context of transport and accessibility policies; and the traveller community in relation to housing needs and choices, through the Gypsy and Traveller Accommodation Assessment. Engagement has also been undertaken with the Gloucestershire Affordable Housing Partnership and Gloucestershire Rural Community Council in relation to affordable housing, specialist housing and rural housing policies, as groups with a particular understanding of issues and opportunities relating to those topics.

Other targeted engagement

Infrastructure providers and transport bodies

3.34. The SLP authorities took the decision to prepare the Infrastructure Delivery Plan (IDP) in-house. This was a significant undertaking, but the SLP Councils wanted to ensure that it accurately captured the complex and often interdependent infrastructure requirements associated with the growth strategy set out in the Plan, building on the strong network of relationships with statutory providers and key stakeholders. This approach enabled infrastructure planning to be integrated directly into the plan-making process, drawing upon close engagement with infrastructure providers, partner organisations and service delivery bodies. As a result, the IDP provides a comprehensive and locally informed assessment of infrastructure needs, costs, delivery mechanisms and funding opportunities.

3.35. As part of this process, workshops and direct engagement was undertaken a range of infrastructure providers, for example Gloucestershire County Council (including transport, education, libraries, flood risk and nature recovery), Severn Trent (local water and waste water treatment provider), Gloucestershire Integrated Care Board and National Grid.

3.36. In recognition of existing transport in the SLP area, such as capacity of the M5 motorway, and the driving force behind the vision for the SLP i.e. climate change, public transport and active travel, a specific Transport Working Group (TWG) was set up. The TWG has representation from Gloucestershire County Council as Local Highway Authority, National Highways as Strategic Highway Authority, Active Travel England and Network Rail. The group met on a regular and ongoing basis and engaged directly in the emerging transport evidence.

3.37. Overall 29 infrastructure organisations and statutory providers have been engaged through this workstream.

3.38. Further information is available with the Statement of Cooperation.

Design Code

3.39. The SLP Design Code has been prepared with support from the Design Code Pathfinder Programme and will provide design guidance across Cheltenham,

Gloucester and Tewkesbury. A dedicated officer working group met regularly throughout its preparation, bringing together planning, urban design, infrastructure, development management and highways specialists to ensure the Code aligns with the emerging Strategic and Local Plan.

3.40. The Design Code has been informed by extensive engagement with residents, members, officers, developers and other stakeholders. An early public questionnaire highlighted the importance of local character, high-quality green infrastructure, connected neighbourhoods, attractive places and good-quality homes. These priorities have directly shaped the Code's approach to placemaking, landscape-led design, movement, biodiversity and community facilities.

3.41. A series of member briefings, officer workshops and developer engagement sessions tested and refined the emerging document. Feedback helped strengthen the Code's approach to character, density, highways, climate resilience, green infrastructure, housing quality, connectivity and deliverability, while ensuring it can be applied proportionately across different types and scales of development.

3.42. The final Design Code reflects the outcomes of this collaborative process, providing a consistent framework to support the delivery of high-quality, sustainable and locally distinctive development across the Strategic and Local Plan area.

3.43. A more detailed summary is provided at Appendix 6.

Economic development specialists

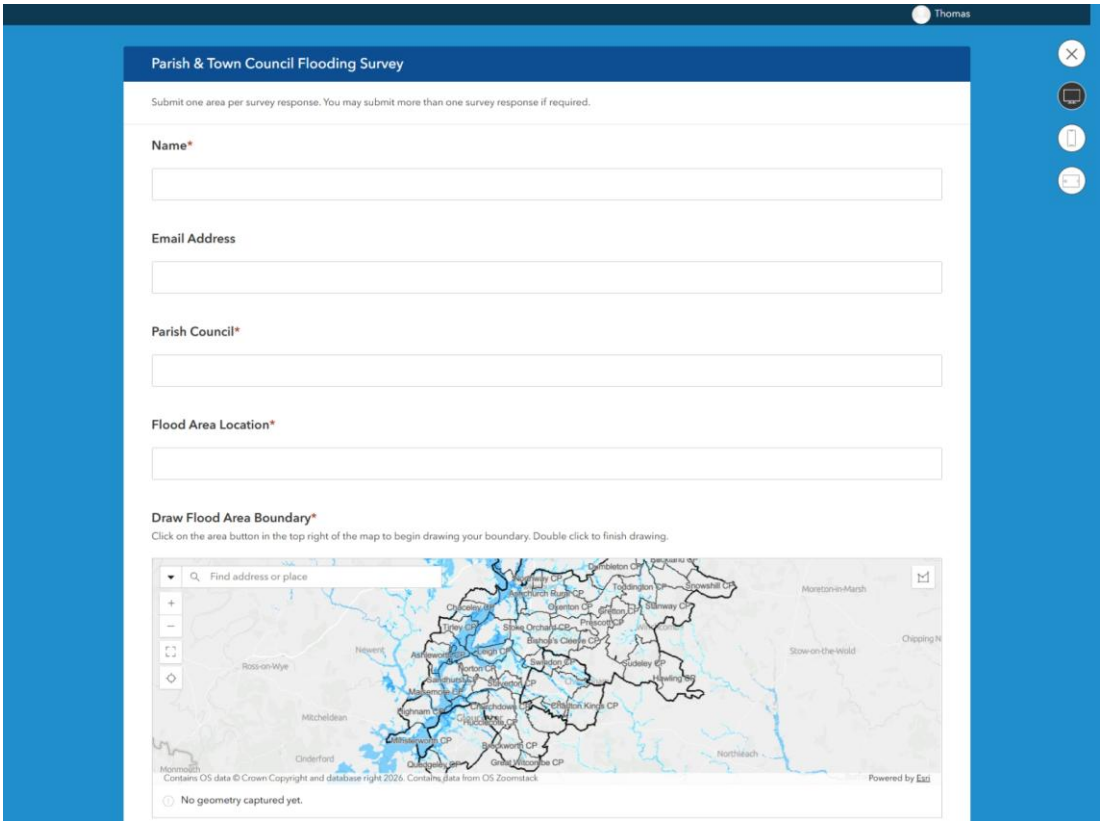
3.44. As part of the preparation of the SLP, the Councils have undertaken ongoing engagement with economic growth specialists across Gloucestershire, including officers from Gloucestershire County Council and the economic development teams of the constituent district councils. This engagement has extended beyond formal consultation stages and has included workshops, evidence review sessions and policy discussions focused on the economic growth strategy, employment land requirements, sector strengths, labour market trends, investment priorities and the role of strategic development locations in

supporting sustainable economic growth across the area. Particular consideration has been given to the economic role of the Gloucester-Cheltenham growth corridor, including opportunities to support the area's internationally significant cyber, digital and knowledge-based sectors, strengthen links between employment, housing and infrastructure provision, and reinforce Gloucestershire's position as a nationally important location for business investment and innovation.

3.45. As part of local government reorganisation arrangements, the functions previously undertaken by the Gloucestershire Local Enterprise Partnership (GFirst LEP) have been absorbed into Gloucestershire County Council. The Councils have therefore continued to benefit from access to strategic economic expertise, business intelligence and stakeholder networks through the County Council's enhanced economic growth function. Regular dialogue with these officers has informed both the preparation of the SLPs economic evidence base and the development of policies supporting business investment, skills development, innovation, employment growth and strategic infrastructure. This has helped ensure that the Plan is founded on robust and up-to-date evidence and provides an appropriate framework for supporting sustainable economic growth, including the continued success of the Gloucester-Cheltenham growth corridor and other key economic locations across the plan area.

Town and Parish Councils

3.46. In July 2026, the SLP team and the appointed flood risk and water environment consultants held an online community engagement session involving representatives from Parish and Town Councils, Flood Wardens, local authority officers and partner organisations to support the preparation of the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS). The session introduced both studies, explained how local evidence could be submitted, and sought information on flooding, drainage and water management issues across the plan area. Attendees were invited to provide local evidence, including flood records, photographs and site-specific information, through the SLP engagement platform. A screenshot of the engagement portal is provided below.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Parish & Town Council Flooding Survey
Submit one area per survey response. You may submit more than one survey response if required.
Name*
Email Address
Parish Council*
Flood Area Location*
Draw Flood Area Boundary*
Click on the area button in the top right of the map to begin drawing your boundary. Double click to finish drawing.
Find address or place
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack
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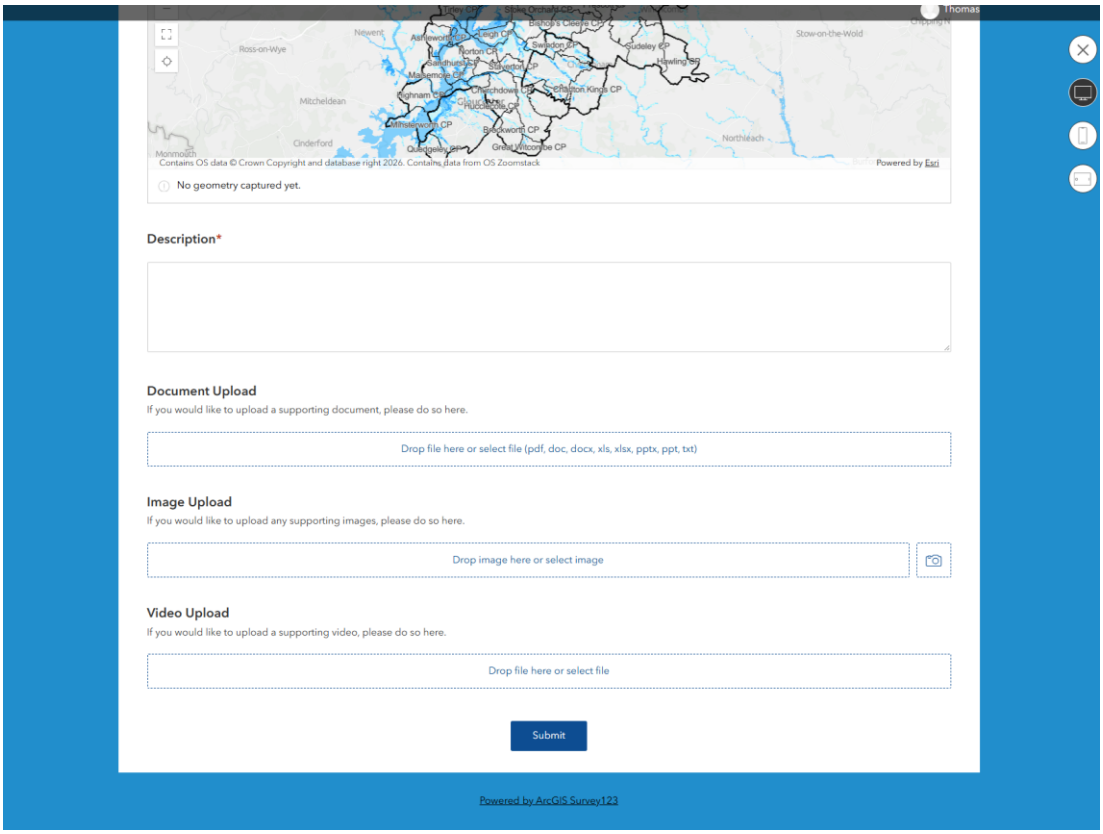
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Drop file here or select file (pdf, doc, docx, xls, xlsx, pptx, ppt, txt)
Image Upload
If you would like to upload any supporting images, please do so here.
Drop image here or select image
Video Upload
If you would like to upload a supporting video, please do so here.
Drop file here or select file
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Powered by ArcGIS Survey123

Figure 4: Image of online 'Parish and Town Council flooding survey'

3.47. The consultation informed the SFRA and WCS by identifying local flooding issues, tributary flood mechanisms, sewer capacity concerns, drainage infrastructure issues, SuDS performance and maintenance concerns, natural flood management opportunities and the potential cumulative impacts of development on flood risk. Importantly, the consultation captured local knowledge and lived experience of flooding that is not always reflected in formal datasets, historical records or hydraulic models, helping to validate technical evidence and identify issues that may otherwise have been overlooked. The information gathered was reviewed alongside evidence from statutory bodies and infrastructure providers and has helped inform the preparation of the SFRA, WCS and ultimately the SLP.

3.48. More generally, the SLP authorities have taken part in two annual Town and Parish Council seminars at Tewkesbury Borough Council. This was an opportunity to update and engage with Town and Parish Councils.

Disability forum

3.49. Towards the latter part in the preparation of the SLP, once evidence was available to support specific policies in the plan, a workshop session was held with a local disability forum, to engage and seek feedback on the appropriateness of the emerging transport and accessibility needs of disabled people. Participants were provided with copies of the draft policies in advance and the session focussed on a roundtable discussion. Feedback from this event has positively influenced the final transport and accessibility policies in the SLP. Notes of the meeting are provided at Appendix 7.

Gloucestershire Affordable Housing Partnership

3.50. Given the importance of delivering the right number of type of homes in the SLP area, the councils undertook targeted engagement with the Gloucestershire Affordable Housing Partnership (GAHP), comprising representatives from Registered Providers together with officers from the partner authorities. The purpose of this engagement was to test and refine the emerging affordable housing, housing mix, housing standards and accessible and adaptable housing

policies with organisations directly involved in the delivery and long-term management of affordable housing. Discussions focused on the characteristics of successful affordable housing schemes, affordable housing thresholds and tenures, viability considerations, accessibility standards, housing mix, additionality, nomination arrangements and the practical delivery of affordable housing through both Section 106 and land-led schemes. This engagement provided valuable insight into both policy development and delivery considerations. Detailed outcomes from the workshop are provided at Appendix 8.

Technical specialists

3.51. A whole council approach has been adopted in the preparation of the SLP. This involved extensive engagement with and between technical specialists, ranging from housing enabling teams, colleagues specialising in the natural and built environment, property, urban design and communities, across the SLP authorities. These discussions have been an important part of the SLP development process and provided valuable check and challenge.

3.52. Climate Change is an important thread through the SLP and the SLP team has benefitted from the appointment of a countywide climate and planning manager funded via the Gloucestershire City and Regional Board. This role was specifically appointed to ensure collaboration on the development of policies around climate and drive positive and best practice. This work is embodied in the SLP as presented at Regulation 19.

3.53. In the latter stages of SLP preparation, the SLP has also benefitted from a further Gloucestershire City Region Board investment, of a Gloucestershire wide planning programme manager. This role has created an important link between early preparation of a Gloucestershire Spatial Development Strategy and the SLP. This role has also been key in supporting and connecting across the duty to cooperate conversations.

3.5. Other consultation and engagement activities

Call for sites

3.54. As is good practice, and in light of the high development needs in the SLP area, the councils have undertaken specific 'call for sites' opportunities, where landowners, developers, site promoters, stakeholders and members of the public, can put forward sites for assessment through the Housing and Economic Land Availability Assessment (HELAA) process for their development potential. The HELAA assesses opportunities for variety of different uses, including housing, employment land and gypsy and traveller accommodation.

3.55. Outside of these targeted events, the opportunity to submit any further sites was available on an ongoing basis through the SLP website (see Figure 5), and within the urban areas, as part of the urban capacity study engagement.

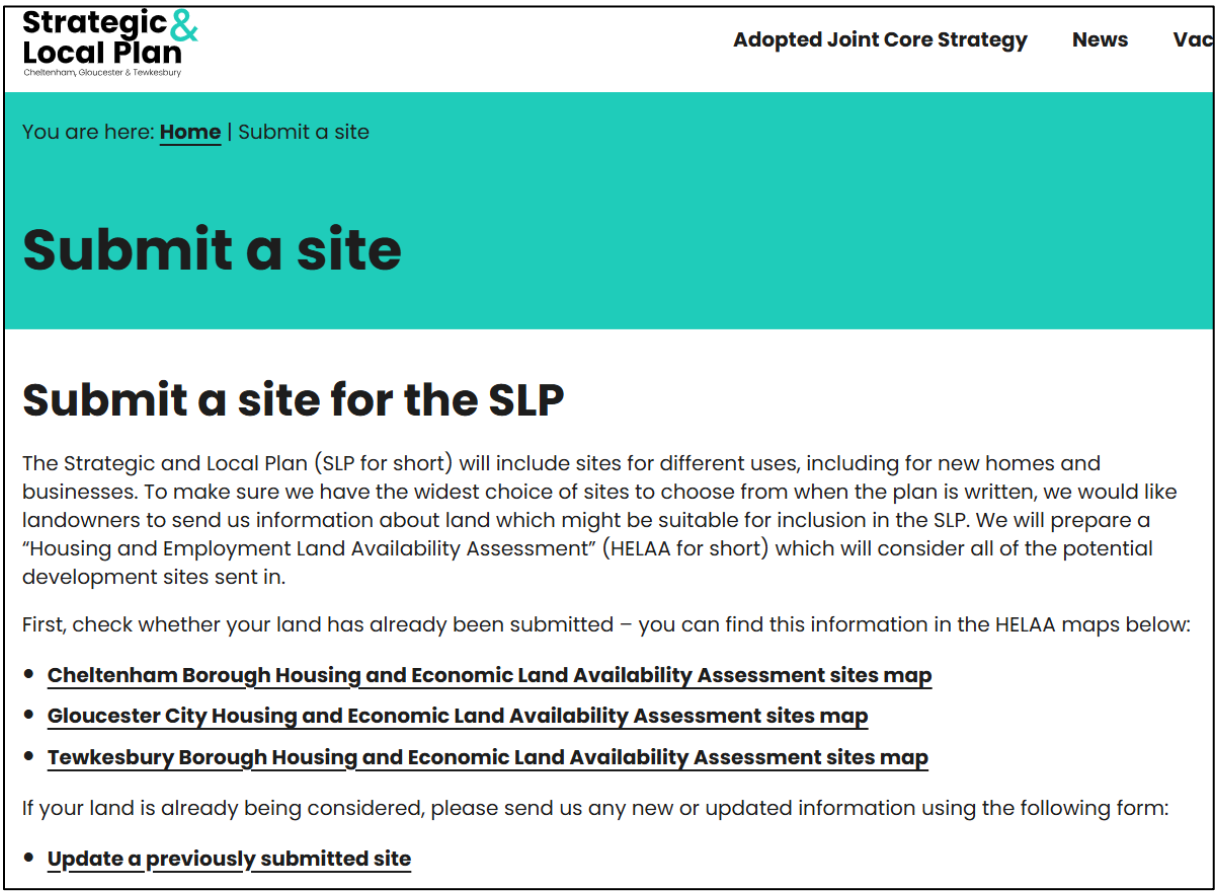


Figure 5: Image of SLP website 'Submit a site' page

Duty to co-operate and strategic partners

3.56. Recognising that the development of strategy and accommodating development needs are influenced and requires a larger than SLP response to cross boundary matters and strategic infrastructure, the SLP councils have engaged constructively, actively and on an ongoing basis with neighbouring authorities, Gloucestershire County Council, statutory agencies and prescribed bodies. This engagement is set out within the Duty to Cooperate Statement and documented through Statements of Common Ground and ongoing technical discussions.

Gloucestershire County Council as SLP partner

3.57. Gloucestershire County Council has been an important and active SLP partner. From a programme perspective, the County Council contributes £60,000 per annum to support the delivery of the SLP and is a member of the SLP Joint Advisory Group, represented by the Cabinet Member for Business, Economic Development, Planning and Infrastructure and a senior officer.

3.58. At an operational level, the SLP team has been supported by county council staff with technical skills and knowledge across workstreams such as transport, flooding and infrastructure. In some workstreams, for example transport, a one team approach has been adopted, with the County Council helping to support the outcomes of consultancy-led technical workstreams.

Member engagement

3.59. From the outset, the preparation of the SLP has been supported by a comprehensive programme of Member engagement, as leaders in their local communities.

3.60. From 2023 onwards this was principally undertaken through each authority's Member Working Group, established to consider and provide feedback on the emerging Plan. Members allocated to sit on this group held the responsibility to feed back to their wider political group, together with drawing any feedback to actively feed into ongoing meetings of the Member Working Group.

3.61. During 2025- 2026 representatives from these groups predominantly met collectively through an SLP wide Member Working Group, ensuring that the views,

opportunities and concerns of each authority have been appropriately considered as policies have been developed. These joint arrangements have enabled Members to oversee cross-boundary matters, consider strategic policy issues and influence the overall direction of the Plan. Again, Members held the responsibility to feed back through their wider political group.

3.62. Terms of Reference are in place to support the activities of the Member Working Group.

3.63. The Member Working Groups have met regularly to review and discuss:

a) Spatial strategy
b) Proposed site allocations
c) Evidence base documents
d) Infrastructure requirements
e) Transport and connectivity
f) Climate change and nature recovery, and
g) draft development management policies

3.64. These discussions provided Members with opportunities to examine all aspects of the SLP in detail, scrutinise the evidence base, check and challenge assumptions and test emerging proposals. Through this process, Members have played an important role in refining and shaping the content of the Plan as it has evolved.

3.65. Feedback received from both the individual authority working groups, and the joint SLP Member Working Group was carefully considered and, where appropriate, incorporated into subsequent iterations of the Plan. This iterative approach has helped ensure that the Regulation 19 SLP reflects local priorities while maintaining a coherent and deliverable strategy across the wider plan area.

3.66. In preparation for Regulation 19 being presented to Councils, detailed briefings were offered and provided to all Members. This facilitated:

a) The context of the SLP in response to planning reforms;

b) An overview of the SLP as a whole;
c) A deep dive into sites; and
d) Development management policies

4. Outcomes of consultation

4.1. Following the Regulation 18 consultation, the SLP councils undertook a comprehensive review of all representations received. The feedback was considered alongside ongoing engagement with stakeholders, updates to the evidence base, changes to national planning policy and further technical assessment work. This process has informed amendments to the spatial strategy, refinement of policies, further assessment of site allocations and strengthened policy wording in many areas.

4.2. Engagement did not stop at the formal consultation stages and has been a continuing feature of plan preparation.

4.3. **This chapter sets out the main issues identified by the Regulation 18 Consultation and Engagement, and how they have shaped the SLP.** Each of the sections below summarises responses related to an issue and sets out how they have informed the SLP's development.

4.1. Timeframe of the SLP

4.4. The Spatial Options and Key Policy Areas consultation asked what timeframe the SLP should cover. It was acknowledged that the NPPF requires a Local Plan to cover a timeframe of at least 15 years from the point of adoption, but that the start date can be earlier.

Issues identified

4.5. A range of views were expressed regarding the length of time the SLP should cover. Some suggested the timeframe should align with the requirements of national policy i.e. 15 years from the point of adoptions, whilst others suggested extending the plan period to align with longer-term infrastructure programmes or strategic projects such as the Tewkesbury Garden Communities initiative. Some suggested much longer timeframes to provide longer-term certainty.

How has this shaped the SLP?

4.6. Having considered the different options, the SLP authorities are of the view that the plan-period should align with the requirement set out in national policy, and cover a timeframe if 15 years from the point of adoption. It is anticipated that following the examination process, the SLP will be adopted in 2028. This means the end date of the SLP would be 2043.

4.7. A 15-year period strikes an effective balance between providing sufficient certainty for communities, infrastructure providers and developers, whilst ensuring the SLP remains responsive to changing economic, environmental and social circumstances. Given the pace of change in areas such as housing need, employment markets, infrastructure funding, environmental policy and climate change, projections extending significantly beyond this timeframe are inherently more uncertain and therefore reduce the effectiveness of the Plan.

Conclusion

4.8. The Councils consider plan period of 15 years from adoption provides an appropriate, proportionate and robust basis for planning the future growth and development of the area, whilst retaining the flexibility to respond to future evidence, changing circumstances and subsequent plan reviews.

4.2. Strategic policy areas

4.9. The Spatial Options and Key Policy Areas consultation asked about the strategic policy topics that the SLP should include. The question specifically referenced the paragraph from the relevant NPPF at that time, which specified what strategic policies should address.

Issues identified

4.10. Respondents highlighted a wide range of issues that they felt should be addressed through the Strategic and Local Plan. Many comments focused on protecting and enhancing the environment, including the need to safeguard green spaces, strengthen green infrastructure, deliver biodiversity net gain and net zero carbon development, and prevent the coalescence of settlements. There were also calls for greater emphasis on designing out crime, preserving the character and amenity of existing communities, making effective use of brownfield land before greenfield sites, and ensuring that the Plan responds to the climate emergency.

4.11. Infrastructure and community capacity were recurring themes. Respondents stressed the importance of planning proactively for healthcare provision, including both primary and secondary healthcare facilities, alongside transport and active travel infrastructure. Suggestions included expanding access to the railway network, introducing traffic calming measures, planning for energy generation and distribution networks, and considering district heating and cooling systems. Some respondents also emphasised the need to future-proof new development and ensure that services and infrastructure are adaptable to changing needs over time.

4.12. Many respondents emphasised the importance of a long-term and strategic approach to growth. This included consideration of Green Belt review and potential Green Belt releases, cross-boundary housing and employment requirements, and the infrastructure needed to support development. Suggestions were also made to align planning more closely with economic strategies, major infrastructure investment opportunities and the views of key

stakeholders such as GFirst Local Enterprise Partnership, to help ensure that future growth supports economic priorities across the area. Overall, respondents sought a comprehensive and forward-looking Plan that balances growth with environmental protection, infrastructure delivery, economic prosperity and the wellbeing of existing and future communities.

How has this shaped the SLP?

4.13. Having considered responses, the SLP authorities are satisfied that the strategic policy framework identified through national policy, and identified as part of the consultation, remains sufficiently broad to address the vast majority of the matters raised. Many of the issues highlighted by respondents are not separate strategic topics in their own right but are important considerations that cut across multiple policy areas. They are therefore embedded throughout the preparation of the SLP rather than being addressed in isolation.

4.14. That said, consultation responses have helped to reinforce those matters that are considered strategic and have been identified as such in the SLP. This includes responding positively to the climate emergency, promoting healthy and safe communities, supporting the delivery of strategic infrastructure, and maintaining a strong emphasis on sustainable and well-connected patterns of growth.

4.15. This is turn has informed the overall structure of the SLP. The Regulation 19 SLP is divided into a series of different chapters, each covering a different topic. In most cases, the first policy(ies) in each section is identified as the strategic policy, providing the overall context for that topic, following by a series of non-strategic policies that support overall delivery.

Conclusion

4.16. The SLP authorities consider that the strategic policy topics identified within national policy remain appropriate and comprehensive. Rather than introducing a significant number of additional strategic policies, consultation responses have supported the overall identification of strategic policy matters, and that other matters are sufficiently embedded within them.

4.17. The final strategic policies in the SLP are as follows:

a) S-HN1 – Housing needs
b) S-EN1 – Employment land needs
c) S-SS1 – Spatial Strategy
d) S-CC1 – Adaptation and resilience
e) S-CC9 – Management of flood risk
f) S- RA1 – Development within rural areas and open countryside
g) S-H1 – Housing standards
h) S-H2 – Housing mix
i) S-H3 – Affordable housing
j) S-I1 – Delivering infrastructure and developer contributions
k) S-QH1 – Green and blue infrastructure
l) S-QH2 – Design and placemaking
m) S-QH3 – Healthy and active communities
n) S-PE1 –Development of key economic sectors
o) S-PE2 –Digital and cyber sector
p) S-PE3 – Advanced engineering and manufacturing
q) S-PE4 – Withybridge Business Park
r) S-ST1 – Sustainable transport and connectivity
s) S-HE1 – Historic environment
t) S-GB1 – Gloucestershire Green Belt
u) S-CT1 – City and town centre hierarchy and principles
v) S-NE1 – Landscape character
w) Sites allocations

4.3. Locally specific policy areas

4.18. The Spatial Options and Key Policy Areas consultation asked about specific policy topics that are unique to only a single council area, neighbourhood or community. This is on the basis that the SLP will cover both strategic matters, which impact all three council areas, and local matters, which impact a smaller geographical area.

4.19. Respondents emphasised the impact of development on infrastructure, transport and the environment. Concerns were raised about the loss of Green Belt land, agricultural land, wildlife habitats and biodiversity, alongside the need to better manage flood risk. Traffic congestion and transport capacity were also recurring themes, with particular reference to pressures on the A40, the B4215 through Highnam and the importance of the M5 Junction 10 improvements in supporting growth in west Cheltenham. Respondents also highlighted the need to protect valued heritage assets, landscapes and local landmarks, while ensuring that recreational opportunities and community open spaces are maintained.

4.20. Many responses called for a more locally informed approach to planning, recognising the distinct characteristics and challenges of different settlements and communities. Respondents emphasised the importance of considering local housing needs, affordability issues and infrastructure constraints when planning for growth. There were also suggestions that urban extensions should be better integrated with existing communities and that planning policies should reflect the differing needs of rural and urban areas rather than applying a uniform approach across the entire plan area.

How has this shaped the SLP?

4.21. Having considered the responses received, the SLP authorities recognise that communities across Cheltenham, Gloucester and Tewkesbury have distinct identities, characteristics, opportunities and challenges. The consultation highlighted the importance of ensuring that growth responds sensitively to local context.

4.22. In considering feedback, and engaging with elected Members on the overall structure and approach to policies in the SLP, officers analysed the content of the existing Joint Core Strategy and district plans, as well as the National Planning Policy Framework, to understand where there are locally specific issues that the SLP should address. This analysis identified that the vast majority of matters where a policy response is necessary are in fact shared. With this in mind, the overall approach of the SLP is to have an overarching policy in relation to a particular topic, with local variation within it where that is justified by evidence. A good example is affordable housing, where different percentages of affordable housing are identified for different areas within the SLP, which reflect viability in those different locations.

4.23. For other locally specific issues in response to the question, it is necessary to take an holistic approach across the SLP area. For example, congestion at specific junctions must be considered in combination with issues that exist elsewhere on the network, within and outside of the SLP area. Likewise, the impact of development across on the transport network must be considered at a strategic scale so that impacts and mitigation requirements can be understood across the network.

4.24. The Councils recognise that local variation is appropriate where there are specific needs, constraints or opportunities that cannot be adequately addressed through a single policy approach. The SLP authorities therefore consider that the most effective approach is one that combines a shared policy approach with recognition of local variation, where supported by evidence. Consultation responses have helped to shape this approach, ensuring that the SLP maintains consistency across the area while remaining responsive to the identity, character and circumstances of individual communities.

4.4. Vision and Strategic Objectives

4.25. The Vision and Strategic Objectives have evolved through several stages of consultation, evidence gathering and stakeholder engagement during the preparation of the SLP. Throughout this process, the Councils have sought to develop a vision that is ambitious, deliverable and locally distinctive, whilst providing a clear framework to guide the Plan's strategy, policies and implementation. The evolution of the Vision and Strategic Objectives reflects an iterative process of testing, refinement and improvement, informed by the SLP authorities corporate / council plans, consultation outcomes, the evidence base, and changes in national planning policy.

Issues identified

4.26. The initial Vision and Strategic Objectives were published as part of the Spatial Options and Key Policy Areas consultation. It set out a broad vision, supported by a series of objectives addressing the environmental, social and economic dimensions of sustainable development. Consultation responses generally supported the overall direction of travel but identified a number of areas where respondents considered greater emphasis / focus was needed, including:

a) Climate change mitigation and adaptation

b) Nature recovery

c) Sustainable transport

d) Infrastructure delivery

e) Housing affordability

f) Economic growth

g) Health and wellbeing

h) Local character and heritage

i) Role of rural communities.

j) Delivering growth with the right infrastructure and timely delivery of it

k) Development contributing and integrating with existing communities

l) Local identify of settlements

4.27. The feedback received informed a comprehensive review of both the Vision and Strategic Objectives. This led to a substantially revised Vision and Objectives framework which sought to provide a more detailed articulation of how the area could evolve over time. This was set out in the Vision and Strategic Objectives Topic Paper, that was published for engagement and feedback.

4.28. The revised approach introduced a series of milestones looking ahead to 2030, 2040 and 2050, expanded the range of outcomes the SLP sought to achieve and considered locally specific matters for each local authority area. Greater emphasis was placed on climate resilience, infrastructure provision, housing delivery, transport connectivity, environmental enhancement, economic prosperity and community wellbeing.

4.29. Engagement on the revised Vision demonstrated broad support for many of the themes and outcomes it sought to promote. Respondents strongly supported ambitions relating to climate action, sustainable development, affordable housing, public transport improvements, walkable neighbourhoods, infrastructure investment and the protection and enhancement of natural and historic assets. There was also support for recognising the role of rural communities, addressing housing affordability challenges and promoting economic growth.

4.30. Feedback on the Strategic Objectives revealed a similar pattern. Respondents generally supported the breadth of issues being addressed, but some sought greater clarity regarding how the objectives would be delivered and measured. Many representations focussed on ensuring that growth is accompanied by the infrastructure required to support it, including transport improvements, healthcare facilities, schools and community infrastructure. Climate change, flood risk, biodiversity, sustainable transport, economic resilience and the quality of the built environment together with the desire for design codes were

repeatedly identified as matters that should be reflected within the objectives. Respondents also called for greater recognition of different housing needs, including affordable housing and specialist accommodation.

4.31. However, whilst there was broad support for the substance of the revised Vision and Strategic Objectives, concerns were expressed regarding their overall complexity and length, principally resulting from splitting the objectives into the 2030, 2040 and 2050 categories. A number of respondents considered that the use of multiple time horizons made the Vision more difficult to understand and introduced unnecessary repetition. Others suggested that the Vision should be more concise, memorable and impactful, providing a clearer expression of the future the Plan seeks to achieve, tied to the plan period.

How has this shaped the Vision and Objectives?

4.32. The Vision and Objectives has evolved over two stages of consultation and engagement. Having reviewed feedback from the most recent topic paper engagement, the councils agree that the overall approach, in splitting the Vision into three different time horizons, whilst well intended, was overly complicated and made it difficult to relate specific elements through to objectives and specific policies in the SLP.

4.33. The Vision continues to place strong emphasis on climate resilience, nature recovery, infrastructure-led growth, sustainable transport, healthy communities, the provision of a wide range of homes, high-quality placemaking and the protection and enhancement of heritage assets. It also retains a strong recognition of the needs of both urban and rural communities and the importance of delivering sustainable growth supported by appropriate infrastructure, services and facilities. It further expands on specific elements for each of the main areas in the Plan.

Conclusion

4.34. The Councils consider that the final Vision and Strategic Objectives represent the culmination of an iterative process of engagement, testing and refinement. Whilst the final structure more closely resembles the original Regulation 18

format, it has been substantially strengthened by the feedback received throughout the plan-making process. The final version incorporates the key themes consistently raised by communities, stakeholders, infrastructure providers and other consultees, including ambitious climate action, infrastructure-led and sustainable growth, improved housing affordability, support for urban and rural communities, environmental stewardship, economic prosperity and high-quality placemaking.

4.5. Climate Change, Carbon Reduction and Renewable Energy

4.36. As part of the Spatial Options and Key Policy Areas consultation, a series of specific questions were asked around the ways the SLP could most effectively address the impacts of climate change, renewable energy and policy measures that could be introduced in relation to the construction and operation of buildings, and the retention and reuse of existing buildings.

Issues identified

4.37. Respondents strongly emphasised the importance of climate change as a central issue for the SLP. A broad range of matters were identified that respondents would like the SLP address, including:

- Reducing carbon emissions and providing a clear framework for reaching net zero;
- Increasing renewable energy generation;
- Improving public transport and active travel opportunities;
- Delivering higher standards of energy efficiency in buildings;
- Managing flood risk;
- Protecting and enhancing biodiversity;
- Strengthening green infrastructure networks;
- Ensuring that development is resilient to the impacts of a changing climate; and
- Responding to climate emergency declarations made by the three authorities.

4.38. A recurring theme was the relationship between the location of development and impact on climate. Respondents supported directing growth towards locations where residents could access jobs, services and facilities without relying on

private vehicles and highlighted the importance of enhancing public transport, walking and cycling infrastructure. These comments have informed both the spatial strategy and transport policies of the SLP. The strategy focuses the majority of growth within and adjoining the Gloucester, Cheltenham and Tewkesbury town, in close proximity to sustainable transport corridors, where opportunities exist to maximise public transport, walking and cycling, These locations also provide access to existing infrastructure, shops, services and facilities. The SLP also provides a comprehensive suite of sustainable transport policies which place walking, wheeling, cycling and public transport at the heart of decision making. This is considered in more detail at Section 4.6 of this Statement.

4.39. Respondents were generally supportive of increasing renewable energy generation across the area. Particular support was expressed for incorporating solar panels into new housing and employment development, alongside opportunities for wind energy, ranging from community-scale turbines to larger schemes in appropriate locations. Some respondents also identified potential for hydroelectric power associated with the River Severn, as well as other low-carbon technologies such as ground-source heat pumps.

4.40. Support for renewable energy was commonly accompanied by calls for appropriate safeguards. Respondents emphasised that renewable energy schemes should be carefully located to minimise impacts on landscapes, heritage assets and the countryside, with a preference for using brownfield sites and lower-quality agricultural land where possible. Many also highlighted the importance of supporting renewable energy generation with battery storage infrastructure and suggested that dual-use approaches, such as combining solar energy generation with agricultural activities, should be explored. Overall, respondents supported an expansion of renewable energy and storage capacity, provided that environmental and landscape considerations are appropriately addressed.

How has this shaped the SLP?

4.41. Overall, there was support for more ambitious policies in relation to the environmental performance of new buildings, such as net zero carbon development, passive house principles, renewable energy generation, electric vehicle infrastructure, embodied carbon and the reuse of existing buildings. These themes have informed the dedicated climate change chapter of the SLP (Chapter 6), which includes policies on matters such as:

a) Climate adaptation and resilience;

b) Climate resilient design;

c) Future fitting and demolition

d) Embodied carbon and the circular economy;

e) Energy management in buildings;

f) Community energy;

g) Renewable energy generation, storage and transmission; and

h) Community energy and district heating systems.

4.42. Together, these policies establish a comprehensive framework for reducing emissions, increasing resilience and supporting the transition to a low-carbon economy.

4.43. The SLP is supported by a comprehensive climate change evidence base. This includes climate mitigation, net zero and carbon budget evidence.

4.44. Responses also identified a series of more specific climate change and carbon reduction related, such as nature recovery, Biodiversity Net Gain and flood risk. These have been addressed specifically in other sections of this statement.

Conclusion

4.45. Consultation responses strongly reinforced the importance of climate change as a cross-cutting issue that should influence all aspects of the SLP. Climate change have been embedded throughout the Plan, informing the vision and strategic

objectives, spatial strategy and the site selection process, and a comprehensive suite of policies. The SLP authorities consider that this integrated approach provides the most effective means of addressing both the causes and consequences of climate change while supporting the delivery of sustainable communities across the plan area.

4.46. While many consultation suggestions have helped shape the Plan, not all could be directly translated into planning policy. Some proposals related to matters that fall outside the scope of the planning system or are already controlled through other regulatory frameworks. Other responses sought blanket restrictions on development or absolute prohibitions on particular technologies that would not be consistent with national planning policy or legal requirements. The SLP therefore seeks to maximise climate benefits through locally justified policies supported by evidence, while remaining consistent with the wider planning system.

4.6. Spatial Strategy and Distribution of Growth

4.47. The spatial strategy and distribution of growth has been explored through the following:

a) Spatial Options and Key Policy Areas

b) Spatial Option Topic Paper

c) Settlement Hierarchy Topic Paper

4.48. In addition, the Urban Capacity Studies, Living Above Shops Topic Paper and Housing Density Topic Paper are relevant, in considering the role that the main urban areas can make in contributing to development needs.

Spatial Options and Key Policy Areas consultation

4.49. This consultation presented six different ways that growth could be delivered in the SLP area, and sites adjoining in neighbouring local authority areas.. It presented six different approaches, including concentrating development in existing urban areas, urban extensions, new settlements, distributing across the rural dispersal, or a scenario focussed around public transport opportunities. Consideration was also given to the role of sites within and outside of Green Belt.

4.50. The consultation asked whether respondents considered there were any other development scenarios that should be considered. A variety of feedback was provided, including:

a) Favouring brownfield sites, including former industrial sites and regeneration / repurposing of city and town centres;

b) Increasing densities in the urban areas to make the most efficient use of land;

c) Different blends of the options, including for example a combination of urban areas and urban extensions

d) Focussing development around the five main settlement of Gloucester, Cheltenham, Tewkesbury, Bishops Cleave and Winchcombe, where sympathetic to the form and structure of each settlement;

e) Strategic sites that are big enough to accommodate the required infrastructure e.g. 2,000 to 3,000 homes;

f) A combination of all of the scenarios presented (various options suggested);

g) Increased density and concentration in urban areas, allowing for some Green Belt releases to protect the wider natural landscape areas, focussed within a clearly defined transport corridor;

h) Larger expansion of existing towns;

i) Infrastructure-led – directing development to locations that have a base level of employment, services and facilities;

j) Do nothing – assume no population growth;

k) Small sites of a few hundred houses in each 'pepper potted' across the area;

l) Identify Green Belt locations that make less of a contribution to purposes of the Green Belt;

m) A variety of additional transport focussed scenarios e.g. better public transport to meet Net Zero targets, integration of development and minimise 'unnecessary movements', an additional River Severn Crossing;

n) A variety of growth in villages scenarios e.g. sustainable levels of growth to increase functionality, identifying village clusters, growth at a proportionate level to support rural villages;

o) Landscape focussed scenario that avoids the Cotswold National Landscape;

p) New settlement option.

4.51. Overall, the responses were varied and explored a variety of different ways that growth may be delivered. There was a strong support for making effective use of

previously developed land and regeneration opportunities, whilst ensuring that future housing and employment growth is balanced with the protection of environmental assets, local character and the Green Belt. A recurring theme was the need for growth to be supported by appropriate infrastructure, directed towards locations with good access to services, facilities and sustainable transport, and planned in a way that responds positively to environmental constraints and opportunities.

Spatial Options Topic Paper

4.52. Drawing on this feedback, and recognising that none of the development scenarios presented in the earlier consultation would likely deliver sustainable growth in their own right, the Spatial Options Topic Paper explored different ways that development needs could be delivered. It considered different combinations that could be capable of delivering the overall development challenge. These were:

a) Option 1: Strategic scale growth along a sustainable transport corridor with urban fringe opportunities along the express bus corridor;

b) Option 2: Strategic scale growth along a sustainable transport corridor, with smaller scale growth at rural settlements that are well connected to public transport;

c) Option 3: Strategic scale growth along a sustainable transport corridor, plus growth at Winchcombe and Service Villages, in locations outside of the Green Belt; and

d) Option 4: Growth dispersed across the rural area, with the identification of limited strategic scale opportunities around Gloucester, Cheltenham and Tewkesbury.

4.53. Each option was accompanied by a description, and a map showing the development options that could be selected for that option. This was based on evidence available at the time the topic paper was prepared, including

constraints and indicative housing capacities for each of the different site options presented.

4.54. In addition, a further four options were explored and discounted, as they would not be able to meet the overall development requirement.

4.55. In terms of feedback, Options 1 and 2, which focused on strategic growth linked to sustainable transport corridors and larger-scale development opportunities, received varying degrees of support, which was principally based on their ability to coordinate strategic infrastructure delivery, support sustainable transport investment and plan growth around locations that are well connected to existing urban areas. However, both options also attracted opposition from residents, with concerns focused on the release of Green Belt land, pressure on existing infrastructure and the potential impacts on Churchdown, Chosen Hill and the wider Gloucester-Cheltenham corridor.

4.56. Option 3 received the strongest level of support from residents and community groups. Support was predominantly based on its avoidance of Green Belt release and the perceived benefits this would deliver in terms of protecting landscape character, biodiversity, the coalescence of settlements and local identity.

4.57. Option 4 received the lowest level of overall support, which focussed on delivering substantial growth at rural villages, with fewer strategic scale opportunities. Those supporting the option generally welcomed the reduced reliance on larger strategic sites and the greater distribution of growth. However, significant concerns were raised regarding increased car dependency, potential impacts on the character of villages, infrastructure delivery challenges and questions regarding consistency with national planning policy objectives.

Settlement Hierarchy Topic Paper

4.58. The Settlement Hierarchy Topic Paper considered the evidence and methodology used to assess the relative role, function and sustainability of settlements across the SLP area. It reviews factors such as population, service provision and accessibility to establish an updated settlement hierarchy, reflecting changes that have occurred since the previous assessment undertaken for the Joint Core

Strategy (JCS). The resulting hierarchy forms an important part of the evidence base for the SLP, helping to inform the spatial strategy and ensuring that future growth is directed towards the most sustainable locations while recognising the differing characteristics and capacities of individual settlements.

4.59. A number of consultation responses commented on the emerging settlement hierarchy, including concerns regarding the proposed categorisation of certain settlements and the accuracy of some of the underlying data. In particular, responses focused on the identification of Apperley as a Service Village, citing its limited range of services and facilities and the absence of regular sustainable transport options. Representations also highlighted instances where they considered the population data and settlement boundaries used within the assessment to be an inaccurate reflection of the places in which they live.

Urban Capacity Studies, Living Above Shops Topic Paper and Housing Density Topic Paper

4.60. The main purpose of the Urban Capacity Studies, Living Above Shops Topic Paper and Housing Density Topic Paper was to ensure that all possible options are identified within the main settlements of Cheltenham, Gloucester and Tewkesbury (brownfield or other opportunities), and that the best possible use is made of made of them by maximising density.

Urban Capacity Studies

4.61. Most respondents focussed more on the conclusion that urban capacity alone would be insufficient to meet development needs, and that alternative sites would be required elsewhere. Concerns about the loss of countryside, agricultural land, habitats and biodiversity. There were calls for the study to place greater emphasis on nature recovery, Biodiversity Net Gain and strategic green infrastructure, while others argued that more could be done to maximise urban capacity through higher-density development and more efficient use of land before considering further greenfield release.

4.62. In contrast, some respondents, particularly from the development sector, supported the conclusion that urban land alone will be insufficient to meet future housing needs and argued that strategic greenfield allocations will be required, particularly in Tewkesbury Borough. A smaller number of comments focused on design and heritage considerations, promoting the reuse of existing buildings, traditional architectural approaches and limiting demolition where possible.

Living Above Shops Topic Paper

4.63. This topic paper explored the contribution that the use of vacant floors above shops in the main city and town centres could make to meeting development needs. Very few people responses, however those that did expressed strong support for increasing residential use above shops as a way to boost housing supply, revitalise town centres and make better use of underutilised upper floors. Many felt that planning policy should take a more positive and enabling approach, with fewer barriers to conversion and greater support for town-centre living. Concerns were raised that current policy can be overly cautious, with obstacles including noise constraints, access requirements, servicing arrangements, waste storage, absentee ownership and the challenges of adapting heritage buildings. There were calls for clearer and more practical guidance, particularly for listed buildings and conservation areas, alongside a more flexible approach to standards where this would help bring vacant space back into productive use.

4.64. Furthermore, respondents supported broader town-centre densification through additional storeys, mansard roofs and a wider mix of residential formats, including shared living and HMOs. However, this support was tempered by a strong desire to retain active ground-floor frontages, protect historic shopfronts and ensure that development respects the character, heritage and vitality of centres. Overall, respondents favoured a more ambitious and enabling policy framework that actively promotes living above shops as part of town-centre regeneration, while balancing heritage protection, good design and the continued function of vibrant high streets.

Housing Density Topic Paper

4.65. This topic paper provided an analysis of density in different locations, with the aim of ensuring that the best possible use is made of sites, in a way that responds to local character. This will then be used in assessing the housing capacity of development opportunities through the Housing and Economic Land Availability Assessment (HELAA).

4.66. Generally respondents were supportive of increasing housing density and making more efficient use of land, but stressed that density should be based on local circumstances rather than applied uniformly. Many advocated an 'optimum density' approach that takes account of local character, housing needs, site constraints, infrastructure capacity and placemaking objectives. There was support for directing higher-density development towards sustainable locations such as city and town centres, brownfield sites and areas well served by public transport, although views differed on how ambitious the strategy should be. Some respondents argued for substantially higher densities, particularly in Cheltenham and around transport hubs, while others warned that expectations may already be too optimistic given the land requirements associated with biodiversity, flood risk, green infrastructure, heritage assets, open space and supporting infrastructure.

4.67. However, while some recognised that higher densities can help support public transport and local services, others emphasised that they must be accompanied by appropriate transport and community infrastructure and should not exacerbate congestion. There was also strong support for ensuring that higher-density development delivers high-quality places, with adequate living space, amenity provision, trees and green infrastructure. Several respondents called for a stronger evidence base, including analysis of completed developments, monitoring of achieved densities and clearer links to related evidence. Overall, there was broad agreement with the principle of increasing density, but differing views on the extent to which higher densities can realistically be achieved in practice.

How has this shaped the SLP?

4.68. A central consideration in developing the spatial strategy has been the need to accommodate identified housing and employment requirements. The SLP needs to provide for at least 42,775 dwellings and 192 hectares of employment land over the plan period[3].

4.69. Taken together, the 'Spatial Options and Key Policy Areas' consultation, and topic papers have explored the different ways in which this could be delivered. However, the amount of development that is required, and the presence of significant constraints such as flood risk, National Landscape Green Belt, mean that options are limited. Overall, feedback supports the need for a balanced approach that makes the best use of brownfield and other urban sites, whilst responding to concerns around the release of Green Belt and other land in the countryside, infrastructure capacity, the need to support but not over deliver at rural settlements, address climate change, transport capacity and public transport opportunities. Feedback demonstrated that no individual option would be capable of resolving all of these issues in isolation, and there were a variety of views expressed on how sustainable growth could best be delivered in the SLP area.

4.70. Evidence in relation to existing planning permissions[4], undeveloped site allocations in existing local plans[5] and consideration or urban capacity, along with the review of density, shows that whilst the main urban areas present a good starting point for delivering development needs, they are not enough on their own. Is it necessary therefore to consider additional sites elsewhere.

4.71. In doing this, the SLP authorities have considered how this can be achieved in a way that meets the overall vision, which has a focus around meeting the challenge of climate change and sustainable travel. Drawing on the Settlement Hierarchy, accessibility analysis, infrastructure evidence, environmental constraints and Sustainability Appraisal, it adopts an urban-first approach, directing the majority of growth to the Gloucester-Cheltenham-Tewkesbury corridor as the principal location for development. This reflects the concentration

[3] Gloucestershire Housing and Economic Needs Assessment
[4] Each district council's housing monitoring report
[5] Joint Core Strategy, Cheltenham Plan, Gloucester City Plan and Tewkesbury Borough Plan

of homes, jobs, services and infrastructure within the corridor, together with the opportunities to support sustainable travel patterns and coordinated infrastructure delivery.

4.72. The strategy provides for strategic-scale site allocations in locations well served by public transport and active travel, together with proportionate growth at rural towns and villages, with a more restrained approach is taken within the wider rural area. Overall, the strategy seeks to balance the delivery of homes, jobs and supporting infrastructure with the protection of environmental assets, landscape and settlement character, while supporting the long-term sustainability of local communities.

4.73. The spatial strategy is underpinned by five key principles:

a) **Urban First** – prioritising the efficient use of regeneration opportunities, previously developed land and urban capacity within the main urban areas.
b) **Sustainable Transport** – directing growth towards locations that maximise opportunities for public transport, walking, cycling and wheeling and reduce reliance on private vehicles.
c) **Climate Resilience** – promoting development patterns that contribute towards climate mitigation and adaptation objectives.
d) **Infrastructure-Led Growth** – aligning development with the timely provision of transport, education, healthcare, utilities, green and blue infrastructure and community facilities.
e) **Well-Designed and Healthy Places** – creating attractive, inclusive and sustainable communities which support health, wellbeing and social interaction.

f) **Settlement role and function:** directing proportionate growth having regard to the relative sustainability, accessibility, role and function of settlements, alongside development opportunities and relevant environmental and infrastructure considerations

Conclusions

4.74. The Spatial Strategy has been shaped by consultation feedback, evidence and ongoing engagement with stakeholders and infrastructure providers. Respondents consistently highlighted the importance of ensuring that growth is supported by appropriate infrastructure, addresses climate change and is located where public transport, walking and cycling opportunities can be maximised. These principles have informed both the overall distribution of development and the assessment of individual site allocations.

4.75. Feedback received through the Regulation 18 consultation, the Spatial Options Topic Paper and wider engagement played an important role in testing alternative approaches, identifying key concerns and refining the preferred strategy. While views differed, with some respondents favouring a greater focus on urban development, others advocating increased rural growth, and some opposing any Green Belt release, no single alternative was capable of meeting identified housing and employment needs whilst also addressing the full range of sustainability, infrastructure, transport, environmental and deliverability considerations.

4.76. The resulting Spatial Strategy therefore represents a balanced and evidence-led approach that responds to the opportunities and constraints of the SLP area. The SLP authorities consider that it provides the most sustainable and deliverable framework for accommodating housing, employment and infrastructure needs over the plan period, while supporting the vision and strategic objectives of the SLP.

4.7. Rural areas and Settlement Hierarchy

4.77. It is important that full consideration is given the role of the rural areas can play in delivering sustainable growth. The 'Spatial Options and Key Policy Areas' consultation asked whether there were settlements not currently identified in the Settlement Hierarchy, that could you should be included. Most respondents did not answer this question, but those that did included a number of suggestions for inclusion, such as Ashleworth, Twigworth, Shurdington, Churchdown and Gotherington. Other suggestions included places that aren't located in the SLP area, such as Newent, or broad areas rather than specific settlements, such as around M5 junctions or the M5 corridor.

4.78. This feedback was considered as part of the Settlement Hierarchy Topic Paper, which examined the role and function of settlements across Cheltenham, Gloucester and Tewkesbury. Understanding how settlements currently function is an important step in developing an appropriate spatial strategy, as it helps identify where future growth can be most sustainably accommodated and how different communities serve both their residents and surrounding areas.

4.79. The topic paper was published for feedback and a variety of responses were received. The majority of responses from this feedback relates to Apperley, with a strong and consistent view that it should not be designated as a Service Village, as it does not reflect local circumstances, which has limited facilities, poor accessibility and infrastructure constraints.

4.80. Respondents were fed back on Churchdown, in terms of the settlement classification and development pressures. A number of respondents argued that Churchdown has been incorrectly classified as an urban fringe settlement, suggesting instead that it should continue to be recognised as a distinct village, or alongside Innsworth as a small town.

4.81. More generally, respondents questioned the accuracy of the evidence base supporting the draft hierarchy, for example population figures and service data for Churchdown and Innsworth. Several responses suggested improvements to the settlement hierarchy methodology itself. While some respondents supported

the principle of reviewing and refining the hierarchy, others felt it had become overly complex, lacked transparency in places and needed stronger justification, particularly regarding accessibility assumptions and distinctions between settlement tiers.

How has this shaped the Settlement Hierarchy?

4.82. Following this feedback, the Settlement Hierarchy Topic Paper and supporting evidence base were subject to further review, as part of the emerging Settlement Role and Function Study. This included a detailed reassessment of settlement boundaries, population estimates and the methodology used to identify and score services, facilities and accessibility. Where necessary, refinements were made to the methodology and data sources to ensure that the assessment provided the most accurate and robust representation of each settlement's current characteristics and function.

4.83. The updated assessment confirmed that both Apperley and Minsterworth perform less strongly against the settlement hierarchy criteria than originally envisaged. The review identified a relatively limited range of services and facilities within both settlements and more constrained accessibility to key services, employment opportunities and public transport when compared with higher-tier settlements. In the case of Minsterworth, the assessment also identified a reduction in local service provision since the 2017 Settlement Audit. As a result, both settlements have been repositioned within lower tiers of the hierarchy to better reflect their current role, function and overall sustainability. The revised hierarchy provides a more robust, transparent and evidence-led basis for directing future growth to the most sustainable locations across the SLP area.

4.84. As a result, Apperley and Minsterworth have been moved to lower tiers within the settlement hierarchy, reflecting their more limited service provision and lower levels of accessibility, relative to higher-tier settlements. Amendments were also made to the methodology, settlement boundaries and population data, where

appropriate, to ensure that the assessment is based on the most accurate and up-to-date evidence available.

4.85. Section 4.6 of this Statement provides more information in relation to considerations regarding the spatial strategy of the SLP.

4.8. Nature Recovery, Green Infrastructure and Biodiversity

4.86. The protection and enhancement of biodiversity, green infrastructure and the natural environment emerged as recurring themes throughout consultation responses. Across a range of consultation questions, respondents emphasised the importance of ensuring that growth is planned in a way that not only avoids harm to environmental assets but actively contributes towards nature recovery, ecological resilience and improved access to high quality green spaces.

Issues identified

4.87. Nature recovery, biodiversity and green infrastructure emerged as important themes from consultation and engagement. Respondents expressed concerns about biodiversity loss and the potential impacts of development on wildlife and habitats, and many called for more robust approaches to biodiversity net gain. There was strong support for protecting environmental assets and ensuring that new development contributes positively to the natural environment rather than simply mitigating harm.

4.88. A recurring message was the importance of creating a more connected ecological network across the plan area. Respondents highlighted the role of green corridors in linking habitats and supporting wildlife movement, alongside wider measures to restore and enhance biodiversity. Suggestions included rewilding initiatives, the use of hedging in place of fences, less intensive grass cutting regimes to improve biodiversity, and the incorporation of wildlife features such as nesting cavities within new buildings.

4.89. Many respondents emphasised the close relationship between biodiversity, climate change and flood risk management. There was strong support for habitat restoration, wetland creation, natural flood management measures and the incorporation of Sustainable Drainage Systems (SuDS) within new development. These nature-based solutions were seen as capable of delivering multiple benefits, including biodiversity enhancement, improved ecological resilience and flood mitigation. Collectively, the feedback highlighted the

important role of green and blue infrastructure in supporting nature recovery and helping communities adapt to the effects of climate change.

How has this shaped the SLP?

4.90. In response, the SLP includes a comprehensive policy framework covering nature recovery, green and blue infrastructure and biodiversity. These include:

a) Biodiversity net gain

b) Ramsar sites, Special Protection Areas and Special Areas of Conservation;

c) Protected species

d) Protected sites and habitats

e) Woodland, trees and hedgerows

f) Nature recovery

4.91. In relation to point f), the SLP supports the implementation of Gloucestershire's Local Nature Recovery Strategy (LNRS), providing a framework for the creation of more resilient and connected ecological networks across the county.

4.92. All the 'Natural Environment' policies, as well as some policies in other SLP sections but which are closely aligned, have been reviewed with feedback by members of groups such as the Gloucestershire Local Nature Partnership, the Gloucestershire Local Authorities Planning and Biodiversity Group, and officers at Gloucestershire County Council working on the LNRS. Furthermore, the Woodland, Trees and Hedgerows policy has had significant drafting input from the tree officers from each of the SLP councils. Cotswold Beechwoods Special Area of Conservation - Mitigating Recreational Pressure, has been drafted in part using updated recent advice from Natural England and on the basis of new adopted and in progress Suitable Alternative Natural Greenspace (SANG) studies for the SLP area.

4.93. Furthermore, a new Green and Blue Infrastructure Strategy (GBIS) has been prepared. The GBIS is a key part of the SLP evidence base provides the strategic framework for protecting, enhancing and extending the network of green and blue infrastructure across the SLP area. It recognises green and blue infrastructure as essential infrastructure, alongside transport, education and health facilities, and seeks to ensure that growth contributes positively to a connected network of green spaces, watercourses, habitats and landscapes. The strategy responds to emerging challenges including climate change, biodiversity loss, flood risk and increasing recreational pressure, whilst supporting the delivery of the Gloucestershire Local Nature Recovery Strategy, Biodiversity Net Gain requirements and wider environmental objectives.

4.94. The GBIS has directly informed the development of green and blue infrastructure policies in the SLP. It provides a framework for shaping the location and design of development, guiding masterplanning, identifying priorities for on-site and off-site green infrastructure provision, and directing developer contributions and other investment towards strategic environmental improvements. The strategy does not allocate land or create new designations, but it helps ensure that plan-making and development decisions protect and enhance the area's green infrastructure assets, support nature recovery and deliver sustainable, healthy and climate-resilient communities.

4.95. The consultation also generated a number of detailed suggestions relating to specific land management practices, mandatory wildlife features and the declaration of a wildlife emergency. Whilst many of these matters fall beyond the scope of the planning system, they have helped inform the overall direction of the Plan by reinforcing the importance of ecological enhancement, environmental stewardship and securing long-term benefits for nature alongside future growth.

Conclusion

4.96. Responses have been reflected throughout the SLP and have helped shape both the Plan's strategic direction and detailed policy framework. The Vision and Strategic Objectives place a strong emphasis on nature recovery, environmental

enhancement and the creation of resilient green and blue infrastructure networks. This is supported by a comprehensive suite of policies relating to biodiversity net gain, nature recovery, green and blue infrastructure, trees and hedgerows, landscape character, protected habitats and species, water environments and wider environmental enhancement. Together these policies seek to ensure that development not only avoids unacceptable harm to biodiversity, but contributes positively towards reversing biodiversity decline and improving ecological resilience across the plan area.

4.97. Overall, consultation responses demonstrated strong and consistent support for a plan-led approach to nature recovery. This consistency of feedback has helped shape and strengthen the SLPs approach to biodiversity, green infrastructure and ecological resilience. The SLP authorities consider that the resulting policy framework provides a robust basis for securing meaningful environmental improvements alongside the delivery of sustainable growth across the plan area.

4.9. Green Belt

4.98. The issue of Green Belt is a cross-cutting theme and has been considered through a number of different elements of consultation and engagement. This includes the Spatial Options and Key Policy Areas consultation, which considered different ways that growth could be delivered, and as part of the Spatial Options Topic Paper, which considered ways that development requirements could be delivered. This section brings together a summary of those responses.

Issues identified

4.99. A range of views were provided regarding the role and purpose of the Gloucestershire Green Belt, the majority of which lies within the SLP area (Tewkesbury Borough Council and Cheltenham Borough Council). A small amount also exists in Cotswold District Council. Responses addressed matters such as:

a) Whether or not Green Belt boundaries should be reviewed;

b) The relationship between housing and employment needs and Green Belt protection; and

c) The contribution of the Green Belt to settlement identity and the role it plays in protecting landscape character and preventing the coalescence of settlements.

4.100. Many respondents highlighted strong support for the continued protection of the Green Belt and the important role it plays in preventing urban sprawl, safeguarding the countryside from encroachment, maintaining settlement identity and preventing the coalescence of settlements. Concerns were raised regarding the potential loss of Green Belt land to development and the implications this could have for landscape character, biodiversity, infrastructure capacity and local identity. Some respondents advocated that no Green Belt land should be released under any circumstances.

4.101. In contrast, others supported more extensive Green Belt release to accommodate housing and employment growth. Changes to the Green Belt should be informed by robust evidence and consideration through the SLP. A consistent theme was that Green Belt decisions should form part of a wider evidence-led assessment of how development needs can most sustainably be accommodated across the plan area.

How has this shaped the SLP?

4.102. Over 20 years to 2043, the SLP seeks to deliver at least 42,775 dwellings and 192 hectares of employment land, as well as pitches, plots and moorings to meet the needs of traveller communities and retail floorspace. In considering how to address this, the SLP authorities first considered the contribution that could be made through existing planning permissions, undeveloped allocations in the Joint Core Strategy and district plans, and urban capacity (regeneration opportunities, previously developed land and other sites in and around the main urban areas of Gloucester, Cheltenham and Tewkesbury Town). This work was informed through the annual monitoring reports, urban capacity studies, and the Housing and Economic Land Availability Assessment (HELAA).

4.103. This evidence demonstrates that these sources of supply can make an important contribution towards meeting development needs. This is a key principle of the spatial strategy and the SLP includes policy to ensure the efficient use of sites in the main settlements.

4.104. However, the evidence also demonstrates that these opportunities are not sufficient to accommodate development requirements and it is necessary to identify sites elsewhere. The SLP authorities considered ways in which this could be achieved through the Spatial Options and Key Policy Areas consultation, and more recently published Spatial Options Topic Paper. The geography of the SLP area is broadly characterised as having areas of flood risk to the west and the Cotswold National Landscape to the east, both of which are significant constraints to new development. The main urban areas of Gloucester, Cheltenham and Tewkesbury are located within the central area which also accommodates key transport routes. The Gloucestershire Green Belt is also

within this central area in close to proximity to the SLP's two largest urban areas, Gloucester and Cheltenham. When considering strategic options, the role of the Green Belt was carefully considered, however, in order to meet the areas housing requirements it is necessary to allocate land within the Green Belt. The identified sites are in locations that support the overall strategy, which is based on access to public transport, walking, cycling and wheeling, and decarbonisation. A Green Belt Topic Paper has also been produced that demonstrates that exceptional circumstances justify the allocation of sites within the Green Belt.

4.105. The role of the Green Belt has been considered through a range of different evidence studies, which in turn has fed into the sites selected. Government policy prescribes how local authorities with Green Belt in their area should assess the Green Belt and identify Grey Belt. Consistent with national policy advice, the SLP commissioned experienced consultants to undertake a Green Belt Assessment for the area. The methodology used divides the Gloucestershire Green Belt into different parcels of land, which have each been assessed against the main Green Belt purposes, as set out in national planning policy. The study also considered whether any parcels meet the definition of Grey Belt, as introduced in the National Planning Policy Framework in 2024. A further study considered the impact of proposed site allocations on the Green Belt, when taken as whole.

4.106. In line with national policy the SLP responds to consultation feedback by retaining strong protection for the remaining Green Belt. Policies S-GB1, GB2, GB3 and GB4 continue to recognise the importance of the Green Belt in preventing urban sprawl, maintaining settlement separation and protecting the openness of the countryside. The resulting approach seeks to maintain the overall function and permanence of the Green Belt whilst protecting land that continues to make an important contribution to its purposes. The plan has needed to balance the need to meet identified development requirements, maintain a deliverable housing and employment land supply, support economic growth and comply with national policy alongside the protection of the Green Belt and other environmental assets. The final strategy therefore reflects a balanced approach informed by evidence rather than any single perspective expressed through consultation.

Conclusion

4.107. Responses on the subject of Green Belt were mixed, with some advocating its full protection, and others considering that some Green Belt release is necessary to meet development needs and create a sustainable pattern of development.

4.108. The feedback received has played an important role in shaping the evolution of the strategy and testing alternative approaches to accommodating growth. In preparing the SLP, the authorities have sought to balance the need to meet identified development requirements, maintain a deliverable supply of housing and employment land, support economic growth, comply with national policy, and protect the Green Belt and other environmental assets. The resulting strategy seeks to maintain the overall function, purpose and permanence of the Green Belt, safeguarding land that continues to make an important contribution to its purposes, while limiting boundary changes to those necessary to support the delivery of housing and employment requirements. This approach has been informed by detailed evidence on both the contribution of individual parcels of land to Green Belt purposes and the continuing performance of the Green Belt as a whole following the proposed boundary changes. The SLP authorities consider that this represents an appropriate and evidence-led balance between safeguarding the Green Belt and delivering sustainable growth in accordance with the wider objectives of the SLP.

4.10. Housing Requirement and Housing Delivery

4.109. Housing requirement and delivery was considered through the Spatial Options and Key Policy Areas consultation, asking whether the SLP should use the Standard Method as a starting point, or an alternative. The consultation also asked whether there are any specific types, sizes, or tenures of housing that the SLP should require for particular groups in the community.

4.110. Furthermore, given the importance of this areas of the Plan, the SLP authorities undertook targeted engagement with the Gloucestershire Affordable Housing Partnership, comprising representatives from Registered Providers together with officers from the partner authorities. The purpose of this engagement was to test and refine the emerging affordable housing, housing mix, housing standards and accessible and adaptable housing policies with organisations directly involved in the delivery and long-term management of affordable housing. Discussions focused on the characteristics of successful affordable housing schemes, affordable housing thresholds and tenures, viability considerations, accessibility standards, housing mix, additionality, nomination arrangements and the practical delivery of affordable housing through both Section 106 and land-led schemes.

4.111. This engagement provided valuable insight into both policy development and delivery considerations. Feedback from Registered Providers informed the continuing evolution of the Affordable Housing, Housing Mix and Accessible and Adaptable Homes policies and helped ensure that they are capable of supporting the delivery of high-quality and sustainable affordable housing schemes. In particular, the engagement reinforced the importance of delivering a broad range of affordable housing tenures, supporting social rented housing, providing accessible and adaptable homes, promoting inclusive communities and maintaining sufficient flexibility to respond to local housing needs and changing market circumstances. The engagement also strengthened the evidence supporting the adoption of housing standards and accessibility requirements and helped ensure that policy requirements were tested against

the practical realities of affordable housing delivery. Detailed outcomes from the workshop are provided at Appendix 8.

4.112. Engagement was also undertaken with Gloucestershire Rural Community Council in relation to rural housing issues and policy development.

Issues identified

4.113. Opinions differed on how growth should be accommodated, there was broad recognition of the need for the SLP to provide a clear and deliverable framework for meeting housing needs and ensuring that our communities have access to suitable homes.

4.114. A recurring theme was the importance of ensuring that housing requirements are supported by a robust and transparent evidence base. Respondents sought assurance that housing requirements were justified, realistic and capable of being delivered through the Plan's proposed strategy. Many responses highlighted the importance of maintaining a sufficient supply of deliverable and developable sites across the plan period and emphasised the need for flexibility within the SLP to respond to changing circumstances. Some respondents argued that housing provision should go beyond minimum identified need in order to support economic growth, improve affordability and provide greater choice within the housing market, whilst others expressed concerns about the overall scale of growth and its potential impacts on infrastructure, the environment and local communities.

4.115. The type and mix of housing to be provided was also an important theme. Respondents highlighted the need for a range of housing types and tenures to meet the different requirements of communities across the plan area, including affordable housing, family housing, specialist accommodation for older people, homes for younger households, specialist accommodation (such as supported housing) self and custom-build opportunities, and accommodation for Gypsy, Traveller and Travelling Showpeople communities. Housing affordability in particular emerged as a significant concern, with many respondents highlighting

the increasing challenges faced by local people in accessing suitable homes within their communities.

4.116. Respondents highlighted the importance of delivering housing in sustainable locations that are supported by infrastructure, services and employment opportunities. Respondents frequently referred to the need for development to be accompanied by appropriate transport infrastructure, schools, healthcare provision, community facilities and green infrastructure. There were also differing views regarding the balance between development on previously developed land, urban extensions and greenfield locations. Whilst many respondents supported a brownfield-first approach and sought to minimise the loss of undeveloped land, there was also recognition that previously developed land alone would not be sufficient to meet identified housing requirements across the Plan area.

How has this shaped the SLP?

4.117. Since the Spatial Options and Key Policy Areas consultation was completed, changes to national planning policy make clear that the Standard Method is the mandatory starting point for local planning authorities, when considering housing need.. This has been further assessed through the Housing and Economic Needs Assessment (HENA), which considers housing need, demographic change, affordability, economic forecasts, market signals and wider strategic considerations. The HENA has concluded this is the need that the SLP authorities should deliver for in the Plan.

4.118. The consultation responses also reinforced the importance of ensuring that housing delivery is aligned with infrastructure delivery. This has been reflected through the Infrastructure Delivery Plan (IDP), which identifies the infrastructure necessary to support the quantity and location of development proposed. This is the then translated into policies around delivery.

4.119. Many of the concerns raised regarding affordability, housing choice and delivering housing for different needs, have also been reflected within the Plan's housing policies, drawing on feedback, which include:

a) Housing standards and housing mix

b) Affordable housing requirements in different locations across the SLP area

c) Specialist housing needs

d) Co living accommodation

e) Student accommodation

f) Residential children's care homes

g) Houses in Multiple Occupation

h) Self and custom build

i) Traveller communities and boat dwellers

j) Rural workers dwellings

4.120. The consultation also highlighted concerns regarding the ability of future housing growth to be delivered in practice. In response, the Plan has been prepared with a strong focus on viability, infrastructure delivery and implementation. Site allocations have been informed by extensive evidence and assessment work, whilst delivery assumptions have been tested throughout the plan-making process to ensure that the development strategy is realistic, achievable and capable of maintaining an adequate supply of housing land over the plan period.

Conclusion

4.121. Overall, responses have reinforced the need to make provision for sufficient housing and of the right type and tenure to meet the needs of our diverse communities, and that housing requirements are evidence led. It has reinforced the need for a balanced approach which delivers sufficient homes to meet identified needs, improves housing affordability and choice, supports economic growth and ensures that development takes place in sustainable locations

supported by appropriate infrastructure. The SLP authorities consider the resulting evidence and policy framework deliver on both of these requirements.

4.122. Not all suggestions received through consultation could be directly incorporated into the Plan. A number of responses sought highly prescriptive requirements relating to tenure delivery, occupancy arrangements, affordable housing management processes, funding mechanisms and housing association operational practices. Whilst these matters are important to the successful delivery of housing, many fall outside the scope of a local plan. Similarly, the Councils concluded that some degree of flexibility is necessary within housing policies to ensure that they remain capable of responding to differing site circumstances, changing needs and evolving market conditions over the Plan period.

4.11. Employment, Economic Growth and Business

4.123. Respondents consistently recognised the importance of maintaining a strong and diverse local economy, supporting business investment and ensuring that the SLP provides opportunities for residents to access a wide range of employment opportunities. Consultation responses highlighted the close relationship between economic growth, housing provision, infrastructure delivery and the creation of sustainable communities.

Issues identified

4.124. A number of recurring themes emerged from the consultation process. These included:

- The amount of employment land required over the duration of the SLP;
- Supporting economic growth;
- The role of strategic employment locations;
- Future employment trends;
- Flexibility to respond to changing market conditions;
- The importance of small and medium-sized enterprises (SMEs);
- Opportunities associated with tourism and the visitor economy;
- The need to avoid unrealistic assumptions regarding future employment growth; and
- Balancing economic aspirations with realistic assumptions regarding market demand, deliverability and business requirements.

4.125. Many respondents emphasised the importance of planning positively for economic growth rather than simply meeting minimum requirements. There was support for ensuring that sufficient employment land is available to support existing businesses, attract inward investment and accommodate emerging sectors. Respondents also highlighted the importance of aligning the SLP with wider economic strategies, infrastructure investment opportunities and long-term economic objectives to ensure that the area remains competitive and attractive to employers.

4.126. Several responses highlighted the importance of maintaining a diverse economic base. Respondents recognised the contribution made by large strategic employment locations, city and town centres, rural businesses, tourism, advanced manufacturing, logistics, the digital economy and knowledge-based industries. There was also support for ensuring that the SLP creates opportunities for home-based working, start-up businesses, innovation and the growth of existing businesses, reflecting changing patterns of employment and advances in technology. Responses consistently emphasised that employment policies should respond to the needs of businesses of different sizes and sectors, ensuring that suitable sites and premises are available across the plan area.

4.127. The relationship between economic growth and infrastructure was another recurring theme. Respondents highlighted the importance of ensuring that employment development is supported by appropriate transport infrastructure, digital connectivity, utilities and community facilities. Several responses emphasised the need for employment growth to occur in locations that are well connected to labour markets and transport networks, whilst ensuring that development remains sustainable and deliverable.

4.128. Respondents identified the need to balance economic growth with environmental constraints and the protection of local character. Whilst respondents generally supported business growth and investment, there was a strong emphasis on ensuring that employment development takes place in appropriate locations, is supported by infrastructure and contributes positively to the quality of places and communities.

How has this shaped the SLP?

4.129. Responses have informed both the vision, strategic objectives and the wider economic strategy of the SLP. Furthermore, the evolution of the employment strategy has been supported by ongoing engagement with economic development specialists from the partner authorities and Gloucestershire County Council, which has now taken on the role previously performed by the GFirst Local Enterprise Partnership. This engagement has provided valuable insight into market conditions, investment opportunities, strategic employment locations,

business requirements and emerging economic trends, helping to ensure that the strategy is both ambitious and deliverable.

4.130. The SLP has been informed by a comprehensive evidence base, principally the Gloucestershire Housing and Economic Needs Assessment (HENA) 2026 and the SLP Employment Land Assessment (ELA)2026, and the SLP Retail Study 2026, together with other evidence such as Gloucestershire's Economic Strategy 2024 – 2034. The ELA considered the future supply of land that is suitable, available and achievable for economic development, alongside market demand, sectoral trends, business requirements and the performance of existing employment areas. Together, this evidence has informed decisions regarding the quantity, location and type of employment land required over the plan period and has helped ensure that the strategy responds to the evolving needs of businesses and investors.

4.131. It is essential that sufficient land is made available in the SLP to support economic growth and investment, whilst retaining flexibility to respond to changing economic conditions. In response, the SLP identifies a portfolio of strategic and local employment opportunities designed to support a diverse economy and provide flexibility throughout the plan period. The strategy seeks to accommodate the needs of a range of sectors, including advanced manufacturing, logistics, office-based employment, research and development activities, tourism, rural enterprise and emerging growth sectors.

4.132. The SLP seeks to provide a balanced portfolio of employment land to support economic growth, while protecting important existing employment areas. The policy framework recognises the complementary roles of strategic employment locations, city and town centres, and rural businesses, supporting both established and emerging sectors in line with national, regional and local economic priorities. Employment sites identified for protection have been assessed through the Employment Land Assessment, and the findings of that work have informed the proposed policy approach.

4.133. Consultation responses and ongoing engagement with economic development specialists highlighted the importance of providing a range of sites and premises

capable of accommodating businesses at different stages of growth, from start-ups and small businesses through to larger strategic employers. The resulting approach seeks to maintain flexibility within the employment land portfolio, support business expansion where appropriate and provide opportunities for investment across a range of sectors and locations.

4.134. Responses also highlighted the importance of ensuring that economic growth is aligned with the wider spatial strategy and infrastructure investment. The resulting approach seeks to direct employment development towards sustainable locations with access to labour markets, transport networks and supporting infrastructure. The SLP also recognises the importance of maintaining an appropriate balance between homes and jobs and providing opportunities for people to live and work within the same broad area, supporting sustainable patterns of growth and reducing the need for longer-distance commuting. This is reflected in the Housing and Economic Needs Assessment (HENA), which considers the balance between homes and jobs.

4.135. Responses highlighted the importance of regeneration and the role that city, town and local centres play in supporting economic activity. These matters are reflected through policies supporting town centre vitality, mixed-use regeneration, tourism, leisure and commercial activity.

4.136. Not all consultation responses could be directly reflected within the SLP. Some respondents advocated significantly higher levels of employment growth, whilst others questioned the need for additional employment land or objected to particular locations. However, the SLP is required to balance economic ambitions against market demand, environmental constraints, infrastructure capacity, deliverability considerations and wider sustainability objectives. Consequently, employment land requirements and allocations have been informed by technical evidence.

Conclusion

4.137. Overall, consultation responses demonstrated strong support for a positive and proactive approach to economic development. The feedback received reinforced the importance of providing sufficient employment land, supporting a

diverse and resilient economy, responding to business needs, improving access to employment opportunities and aligning economic growth with infrastructure delivery. The resulting strategy has been shaped through consultation, ongoing engagement with economic development specialists and a robust evidence base. The SLP authorities consider the approach provides a balanced, flexible and deliverable framework capable of supporting sustainable economic growth, investment and job creation across the plan area and over the plan period.

4.12. Transport, Connectivity and Accessibility

4.138. Transport and connectivity was considered as part of the 'Spatial Options and Key Policy Areas consultation, primarily as part of the infrastructure questions, which asked what types of infrastructure do you consider most critical to be delivered alongside new development, and what supporting infrastructure should be provided alongside strategic scale new settlements. This consultation also presented a range of different 'development scenarios' for the way in which development needs could be delivered, and expressed a series of pros and cons associated with each. One of these was a 'public transport' scenario, which considered growth associated with public transport opportunities. As part of the spatial options topic paper, further consideration was given to the role of public transport and active travel is delivering sustainable growth; spatial options are considered further in an earlier section of this Statement.

4.139. More specifically, the SLP authorities engaged with a local disability forum, who reviewed draft copies of transport and accessibility policies, and provides feedback as to the effectiveness of those policies from their user perspective.

4.140. Transport, accessibility and connectivity emerged as some of the most consistently raised themes in response to consultation and engagement. Respondents repeatedly emphasised that:

- Transport infrastructure would be critical to the success of future growth; and
- Decisions on the location and scale of development should be closely aligned with transport accessibility and infrastructure provision.

Issues identified

4.141. Respondents recognised the crucial role that transport plays in supporting sustainable growth, economic prosperity, access to services and quality of life. They highlighted the importance of integrating transport and land-use planning throughout the plan-making process.

4.142. A number of recurring themes emerged from the consultation responses. These included:

- The need for improved public transport provision;
- More reliable and accessible bus services;
- Enhanced active travel networks;
- Better walking and cycling infrastructure;
- The management of traffic congestion, improvements to strategic highway capacity;
- Reducing reliance on private vehicles; and
- Connectivity between homes, employment, services and community facilities to support more sustainable patterns of movement and development.

4.143. Collectively, responses demonstrated strong support for a transport strategy that prioritises accessibility, provides genuine travel choice and supports the transition to more sustainable forms of transport.

4.144. The importance of sustainable and accessible transport was also reflected through engagement with young people. Participants highlighted the importance of being able to access education, employment, services, leisure opportunities and community facilities and reinforced wider messages regarding the importance of sustainable communities, connectivity and accessibility. This engagement highlighted the role that transport can play in supporting opportunity, inclusion, and health and wellbeing.

4.145. Active travel was another recurring theme, with respondents highlighting the need for safer and more attractive walking and cycling routes, improved connectivity between communities and greater priority for non-car modes of transport. Many representations linked active travel directly to wider objectives relating to health and wellbeing, climate change, air quality and reducing congestion. There was also support for ensuring that development contributes towards the creation of walkable neighbourhoods, with everyday facilities located within accessible distances of homes.

How has this shaped the SLP?

4.146. Consultation responses have informed both transport policies and the wider development of the SLP. In particular, respondents consistently highlighted the importance of ensuring that development is connected to services, facilities and

employment opportunities by sustainable means and that transport considerations are embedded into planning decisions from the outset. These messages have influenced not only the development of transport and accessibility policies, but also wider decisions regarding the spatial strategy and site selection process.

4.147. Transport has been an important consideration in developing both the spatial strategy and individual site allocations. The approach has been informed by a comprehensive evidence base including:

a) The SLP transport evidence base, including a range of assessments and modelling.
b) Appraisal of sites using the Department for Transport Connectivity Tool, and local assessments (such as proximity to key sustainable travel infrastructure).
c) The Sustainability Appraisal.
d) A wide range of other policy and guidance, identified in the transport evidence base prepared to support plan-preparation. These include national guidance, the Gloucestershire Local Transport Plan, Gloucestershire Local Cycling and Walking Infrastructure Plans, and the Gloucestershire Bus Service Improvement Plan.

4.148. This evidence base helped to assess existing transport conditions, identify future infrastructure requirements and understand the relationship between development patterns and travel behaviour.

a) The evidence identifies transport as a significant contributor to carbon emissions and highlights the importance of locating development in places where residents can access employment, education, healthcare, shops and other day-to-day services by sustainable means. Consequently, access to public transport, walking, wheeling and cycling opportunities has become a key principle underpinning the SLP. The resulting approach seeks to direct growth towards locations where sustainable travel choices are already available or can be enhanced through future investment, whilst reducing the need for longer-distance car-based travel wherever practicable.

b) The transport policies adopt a vision-led approach. Rather than planning solely around a forecast continuation of existing travel patterns, this approach considers the transport outcomes the Plan is seeking to achieve and the interventions necessary to support them. This approach has increased our ability to respond to stakeholder feedback and target the wider range of objectives they wish to see reflected (compared to more traditional transport approaches).

c) Transport evidence has also informed the detailed requirements, infrastructure improvements and mitigation measures associated with individual site allocations. Further detail regarding how these principles have shaped the overall development strategy and site selection process is provided elsewhere in this Consultation Statement.

4.149. In addition to the public consultation process, the SLP authorities have engaged extensively with key transport stakeholders through an ongoing SLP Transport Working Group. This group has included representatives from National Highways, Gloucestershire County Council, Active Travel England, Network Rail and neighbouring authorities. The Strategic Transport Assessment prepared to support plan-making provides more detail on the work of this group.

4.150. The Working Group has helped identify transport infrastructure requirements, constraints and opportunities associated with future growth across the plan. It has provided a valuable forum for discussing transport assessment approaches and results, options for interventions and policy development. This engagement has assisted in ensuring that the transport evidence base and policy framework are informed by specialist expertise and aligned with wider transport strategies and programmes.

4.151. The SLP authorities also undertook targeted engagement with the Cheltenham Access Forum to ensure that the emerging transport and accessibility policies were informed by the experiences of people with accessibility needs. Discussions ranged across: the accessibility of public spaces; inclusive design; walking, wheeling and cycling provision; access to services and facilities; and public transport accessibility. Participants highlighted the importance of safe and

accessible routes, sufficient space for mobility aids and assistance animals, the challenges associated with poorly designed shared spaces and the need to ensure that places are designed to accommodate all users.

4.152. This engagement has influenced the development of a number of transport and accessibility policies within the Plan. It reinforced the importance of inclusive design, accessible public transport, convenient access to services and facilities, and the prioritisation of walking and wheeling within the proposed transport hierarchy. It also highlighted the benefits of designing streets and public spaces that work effectively for people with disabilities, older people, families and those with mobility impairments. These principles are reflected throughout the transport, placemaking and healthy communities policies in the SLP.

4.153. A number of participants sought more ambitious public transport provision and stronger guarantees regarding the delivery of transport infrastructure. Whilst these aspirations have informed the SLP's strategy and policy framework, the councils do not have direct control over many aspects of public transport operation required to address their full scope. Delivery of transport improvements frequently depends upon wider partnership working with transport authorities, infrastructure providers, service operators and Government funding programmes. Consequently, whilst the Plan establishes a framework for securing transport improvements through development and supporting sustainable travel, not all specific requests can be delivered through planning policy alone.

4.154. Similarly, some participants advocated transport interventions or infrastructure improvements at specific locations across the plan area. These comments supported the identification of transport requirements through the transport evidence base process set out in the Strategic Transport Assessment. However, some of the measures suggested do not respond directly to issues identified as resulting from the plan. These would require separate funding, programme development and approval processes that sit outside the scope of the SLP.

4.155. The resulting policy framework in the SLP includes the following:

a) A strategic policy in relation to sustainable transport and connectivity

b) Healthy, safe and inclusive design

c) Active travel and public transport

d) Kerbside space and parking

e) Assessing and managing transport impacts

f) Other policies in the SLP address transport and accessibility indirectly, for example design and development within city and town centres

g) Each strategic scale site allocation includes site specific measures that development should deliver

Conclusion

4.156. Overall, consultation responses demonstrated strong support for a transport strategy that promotes sustainable travel, improves accessibility and integrates transport planning with land-use planning. Feedback received through public consultation, engagement with young people, ongoing collaboration with transport authorities and infrastructure providers, and targeted discussions with the Cheltenham Access Forum has helped shape a comprehensive and inclusive transport framework. The Councils consider that the resulting approach provides a robust basis for supporting sustainable growth, reducing transport-related emissions, improving connectivity and ensuring that communities across the plan area are accessible, inclusive and well connected. This has resulted in an approach to transport that not only seeks to address the impacts of development on the transport network, but also to deliver the Plan's wider vision and objectives.

4.13. Infrastructure and Community Facilities

4.157. Infrastructure questions featured as part of the Spatial Options and Key Policy Areas consultation. Specifically, it asked what types of infrastructure are considered most critical to be delivered alongside new development, including strategic scale new developments.

4.158. Infrastructure delivery emerged as one of the most consistently raised themes throughout the consultation and engagement activities. Respondents repeatedly emphasised that infrastructure should be planned, funded and delivered alongside growth, rather than following development at a later date. There was a strong perception that previous development had not always been accompanied by the infrastructure required to support new communities, resulting in increased pressure on schools, healthcare services, transport networks, utilities and community facilities. Consequently, respondents sought for the SLP to ensure that future growth would be supported by appropriate infrastructure and services, and that development would not outpace infrastructure capacity.

Issues identified

4.159. Consultation responses highlighted concerns relating to healthcare provision, school places, community facilities, utilities infrastructure, open space, sports and recreation facilities, digital connectivity and the timing of infrastructure delivery. Respondents also raised questions regarding funding, viability and the ability of service providers to accommodate future growth.

4.160. Respondents consistently advocated a more integrated and coordinated approach to infrastructure planning, whereby transport, healthcare, education, community facilities, utilities, green infrastructure and climate resilience measures are considered and delivered together to create healthy, sustainable and resilient communities.

4.161. The SLP has been shaped by an extensive programme of infrastructure planning, evidence gathering and stakeholder engagement to ensure that growth is aligned with infrastructure capacity and delivery. This work has included ongoing

engagement and consultation with a wide range of infrastructure providers, including Gloucestershire County Council, the NHS, Severn Trent Water, the Environment Agency, utilities companies and Gloucestershire Constabulary. In addition, the SLP Transport Working Group, with representation from National Highways, Gloucestershire County Council (as local transport body), Active Travel England and Network Rail) has also engaged on transport and accessibility matters. This engagement has played an important role in identifying infrastructure requirements, delivery constraints, funding opportunities and investment priorities across the SLP area.

How has this shaped the SLP?

4.162. The principal evidence base supporting this work is the Infrastructure Delivery Plan (IDP). Prepared in-house, the IDP has evolved alongside the SLP and has been informed by ongoing engagement with infrastructure providers and service organisations via consultation, workshops, meetings, calls and evidence sharing exercises. The IDP has not been prepared solely as an evidence base document to support plan examination, but as a practical delivery framework that will continue to guide implementation throughout the duration of the Plan.

4.163. The IDP identifies the infrastructure necessary to support both the overall scale of growth and the locations identified for development. It is supported by evidence and assessments relating to:

- Education
- Healthcare
- Transport
- Community and social services
- Emergency services
- Flood risk and water management
- Climate change
- Utilities and digital infrastructure
- Green and Blue Infrastructure
- Open Space
- Sport and recreation

- Waste management

4.164. In doing so, it considers infrastructure requirements relating to education, healthcare, transport, utilities, community facilities and green infrastructure, together with delivery responsibilities, funding mechanisms, programme dependencies and implementation challenges. Collectively, this evidence has informed the preparation of the growth strategy, site selection process and policy framework, whilst providing a basis for the ongoing coordination and delivery of infrastructure following adoption of the Plan.

4.165. The SLP recognises that successful placemaking extends beyond the provision of housing and employment land. New communities require access to schools, healthcare facilities, parks and green spaces, community buildings, and essential utility infrastructure. Through the Infrastructure Delivery Plan and supporting evidence base, infrastructure is considered as an interconnected network supporting sustainable communities, rather than as a series of separate requirements.

4.166. Long-term resilience has also informed the Plan's approach to infrastructure planning through consultation, workshops and meetings. Evidence, including the Climate Change Adaptation Topic Paper and Gloucestershire Climate Risk and Vulnerability Assessment, has highlighted the potential impacts of flooding, extreme heat, drought and severe weather on key infrastructure networks. In response, the Plan seeks to promote resilient infrastructure systems that are capable of adapting to future challenges whilst supporting the long-term sustainability of communities. Strategic and larger-scale developments are also expected to demonstrate how infrastructure requirements will be coordinated and phased throughout the development process, ensuring that essential services and facilities are delivered alongside growth and that development contributes appropriately towards the infrastructure necessary to address its impacts.

4.167. Not all consultation responses could be directly reflected within the SLP. Some respondents sought guarantees regarding the delivery of specific infrastructure projects or advocated delaying development until all supporting infrastructure

had been delivered in advance. Whilst these concerns have informed the IDP and ongoing engagement with infrastructure providers, many projects remain dependent upon external investment decisions, statutory approvals, Government funding programmes and the priorities of individual delivery organisations. The SLP therefore seeks to identify infrastructure requirements early, coordinate delivery with growth and secure appropriate developer contributions where necessary, whilst recognising that the timing and delivery of individual projects often depends on factors outside the direct control of the SLP authorities.

4.168. The resulting policy framework includes:

a) Delivering infrastructure and developer contributions

b) Digital connectivity and telecommunications infrastructure

c) Supporting and retaining community facilities

d) A number of policies address transport, connectivity and accessibility – see separate section in this statement

e) The spatial strategy of the SLP is supported by a comprehensive IDP, with specific requirements identified in site allocations policies

Conclusion

4.169. The evolution of the SLP reflects the strong feedback received through consultation by placing infrastructure planning at the heart of the growth strategy. The Plan is supported by a comprehensive IDP, a substantial technical evidence base and extensive engagement with infrastructure providers and service organisations. Together, these have helped shape both the growth strategy and site selection process, ensuring that development is aligned with infrastructure capacity and delivery requirements. The Councils consider that this infrastructure-led approach provides a robust and deliverable framework for supporting sustainable growth and creating healthy, resilient and well-connected communities throughout the plan period.

4.14. Flood risk and water

4.170. Flood risk and water featured heavily in consultation responses, particularly in relation to the development scenarios presented as part of the Spatial Options and Key Policy Areas consultation, and the Spatial Options Topic Paper. Respondents consistently highlighted concerns regarding the impact of flooding on communities, infrastructure and future development, and emphasised the importance of ensuring that growth is planned in a way that is resilient to climate change and does not exacerbate existing flood risk issues. Responses also highlighted the importance of water supply, wastewater treatment infrastructure and surface water management as key considerations in supporting sustainable growth.

4.171. More recently, the SLP authorities engaged town and parish councils in the SLP area in a workshop and opportunity to feedback in relation to the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS), being prepared as part of the SLP. This feedback was then provided to our expert consultants, who then fed this information into their analysis.

Issues identified

4.172. Flooding was one of the most frequently raised environmental concerns. Many respondents were concerned about development in areas at risk of flooding and highlighted the importance of careful site selection. Responses referred to flood risk from rivers, surface water and groundwater, as well as the cumulative effects of development on drainage systems and downstream communities. There was strong support for natural flood management measures, wetland restoration and other nature-based solutions that can reduce flood risk while providing wider environmental benefits.

4.173. Respondents emphasised the need for future development to incorporate effective drainage and water management measures from the outset. There was widespread support for high standards of drainage design, including the use of Sustainable Drainage Systems (SuDS), to minimise flood risk and improve resilience to the impacts of climate change. Many stressed that flood risk and

water management should be integral considerations throughout the development process.

4.174. Responses also highlighted the need for sufficient water supply and wastewater infrastructure to support future growth. Respondents were concerned that new development could place additional pressure on existing networks, particularly where infrastructure constraints already exist. Many emphasised the importance of coordinating development with timely investment in water supply and wastewater treatment infrastructure.

How has this shaped the SLP?

4.175. Responses have informed both the SLPs policies and the wider development strategy. Flood risk, water management and drainage considerations have been assessed through a comprehensive evidence base, including the Strategic Flood Risk Assessment (SFRA), Water Cycle Study, Sustainability Appraisal and wider climate change evidence prepared to support the Plan. This work has helped inform the identification of constraints and opportunities, informed site assessments and policies relating to flood risk, water resources and drainage.

4.176. The preparation of the SFRA has been supported by ongoing partnership working with the Environment Agency, Severn Trent Water and specialist flooding and drainage officers from the district councils and Lead Local Flood Authority (Gloucestershire County Council). The WCS has been supported by consultation with Severn Trent Water, Thames Water, Dwr Cymru Welsh Water, the Tewkesbury Flood Warden Network and flooding and drainage officers from the district council and Lead Local Flood Authority. This consultation and engagement has ensured that the Plan is informed by the robust evidence.

4.177. Respondents expressed the need to ensure that growth is directed towards locations that are not subject to flood risk. Flood risk has formed an integral part of the site selection process and the development of site-specific requirements. The SFRA has looked at flood risk at an overarching level (Level 1 of the assessment), with has informed the overall suitability of sites, with a more detailed site specific assessment for proposed site allocations (Level 2). It

identifies mitigation measures where appropriate, ensuring that flood risk is taken into account alongside other considerations.

4.178. SLP policies seek to avoid inappropriate development in areas at greatest risk of flooding, whilst ensuring that flood risk is properly understood and managed throughout the lifetime of development. Policies require a risk-based approach, incorporating the principles of national policy and seeking to ensure that new development is safe, resilient and does not increase flood risk elsewhere.

4.179. Responses supporting stronger water management measures have been reflected through policies promoting Sustainable Drainage Systems (SuDS), multifunctional green and blue infrastructure, natural flood management and climate adaptation measures. The Plan recognises that flood risk management and water management are closely linked to wider objectives relating to climate resilience, biodiversity enhancement, green infrastructure and environmental quality. Consequently, these issues are addressed through an integrated policy framework rather than in isolation.

4.180. The Water Cycle Study has also informed the Plan's approach to water resources and wastewater infrastructure. The SLP recognises the importance of ensuring that adequate water supply, wastewater treatment capacity and drainage infrastructure are available to support planned growth. Policies therefore seek to ensure that development is coordinated with infrastructure provision and that the cumulative impacts of growth on water resources and wastewater systems are appropriately considered.

4.181. Not all consultation responses could be directly reflected within the SLP. A number of respondents advocated blanket restrictions on development within areas perceived to be at flood risk or suggested that no development should take place in locations where any flood risk issues exist. However, national planning policy requires a proportionate and evidence-led approach to the management of flood risk through the application of the Sequential Test, Exception Test where appropriate and site-specific mitigation measures. Consequently, the SLP adopts a risk-based approach informed by detailed technical evidence rather than blanket exclusions.

Conclusion

4.182. Overall, consultation responses demonstrated strong support for a precautionary and evidence-led approach to flood risk, water management and drainage. The feedback received reinforced the importance of directing development to appropriate locations, incorporating effective drainage measures, ensuring sufficient water and wastewater infrastructure capacity and improving resilience to climate change. Resulting policies have been shaped through consultation, ongoing engagement with infrastructure providers and environmental bodies, and a comprehensive technical evidence base. The SLP authorities consider that this approach provides a robust framework for managing flood risk, protecting water resources and supporting sustainable growth across the plan area throughout the plan period.

4.15. City, Town and Village Centres

4.183. The future role of city, town and local centres was subject to consultation through the 'Spatial options and key policy areas' consultation, where specific questions were asked how the SLP could best enable change, encourage investment and support city and town centres to adapt, evolve and thrive. In relation to villages and rural areas, it asked how the SLP could protect and encourage essential shops, services and facilities.

4.184. These issues were further explored through the 'City, Town and Local Centres' topic paper, which reviewed the baseline evidence contained in the Retail Study Phase 1 study, and responses received as part of the earlier consultation, to understand the issues, challenges and opportunities affecting city, town and local centres across the SLP area. It identifies the key factors influencing the vitality, viability and future role of centres that will then feed into relevant policies in the SLP.

Issues identified

4.185. Respondents recognised the significant contribution that centres make to economic activity, community identity, access to services, tourism and quality of life. Consultation responses generally supported the continued vitality and viability of centres but also acknowledged that they must adapt to changing economic circumstances, shopping patterns and community needs.

4.186. A number of recurring themes emerged through the consultation process. Respondents highlighted;

a) The need for centres to evolve beyond their historic retail function, adapt to changing shopping habits, diversify and accommodate a wider range of appropriate uses, such as leisure, food and drink, tourism, cultural activities, community facilities and residential

b) To have a clearer long term vision

c) To be attractive and pleasant places to be

d) Improved accessibility, including better walking, cycling and public transport connections

e) To remain important focal points for the community and visitors, albeit in different ways

f) The importance of supporting regeneration opportunities, particularly in Gloucester City Centre

g) Supporting retail and service uses

h) City and town centres to retain their personality and 'unique selling points'

i) Improving accessibility, public realm and the quality of the environment more generally

j) Maintaining vitality and viability

k) Supporting a greater diversity of uses, including meanwhile uses, and strengthening the evening economy

l) The role of local centres and neighbourhood services in meeting day-to-day community needs and reducing the need to travel.

4.187. In terms of the main city and town centres in the SLP area, responses can be summarised as follows:

4.188. In relation to Gloucester City Centre, responses highlighted the importance of supporting continued regeneration. They recognised the city's role as the principal centre within the hierarchy and emphasised the need to strengthen its attractiveness, economic performance and range of activities. Comments highlighted the importance of investment in the city centre environment, supporting a broader mix of uses and ensuring that the centre continues to evolve in response to changing retail, leisure and commercial trends.

4.189. In relation to Cheltenham Town Centre, respondents emphasised the importance of maintaining the attractiveness, distinctiveness and vitality of **Cheltenham Town Centre**. Responses highlighted the contribution that the town centre makes

to the area's economy, cultural offer, tourism role and community identity. There was support for ensuring that future development and investment continue to reinforce Cheltenham's distinctive character whilst providing opportunities for regeneration, diversification and improvement.

4.190. With regard to **Tewkesbury Town Centre**, respondents frequently emphasised the importance of protecting and strengthening its role as a focus for community activity, heritage, local services and tourism. Respondents highlighted the importance of maintaining access to local facilities and supporting the long-term vitality of the centre in the face of changing economic conditions.

How has this shaped the SLP?

4.191. Responses have informed the development of the SLPs approach to city, town and local centres at Section 15. Feedback from the various activities is clear that their should be a focus on supporting city and town centres to adapt and evolve as their role changes, for example in in providing flexibility around uses, supporting wider uses that help generate footfall, supporting regeneration activities, improved accessibility to support people access centres easier and more efficiently and encourage city and town centre living.

4.192. Policies in this section of the SLP have been supported by a comprehensive and up to date evidence base. This includes the Retail Study (Phases 1 and 2), which undertakes a health check for each centre and makes strategy and policy recommendation based on evidence and future trends. The urban capacity studies and residential above shops topic paper explores opportunities for city and town centre living, and many of these opportunities are identified as allocations for development in the SLP. The Draft Gloucester City Masterplan looks at opportunities to support regeneration and growth within the City Centre and wider city area, as does the Tewkesbury Town Masterplan.

4.193. The resulting policy framework:

a) Establishes a hierarchy of city, town, district and local centres

b) Supports development appropriate to the role of different centres, applies flexibility and supports 'meanwhile uses' as a way of maintaining activity between longer term leases.

c) Supports appropriate regeneration activities and diversification, and supports the delivery of the Gloucester Masterplan and Tewkesbury Town Masterplan.

d) Reflects the changing role in Gloucester by redefining extent of the Primary Shopping Area, to make it smaller and more fit for purposes.

e) Includes a policy to protect against inappropriate development of 'main town centre uses', including retail, located outside of centres, to ensure it does not undermine their role.

f) Includes a policy to support evening and nighttime uses appropriate to their location, and that protects the amenity of local residents, to support appropriate activity at different times of the day.

g) Includes a policy that seeks to protect local shops and public houses that are important to local communities.

h) Includes policies that support living in city and town centres, including living above commercial premises.

i) More generally, other policies in the SLP seek to support improved accessibility within centres, and to and from centres.

Conclusion

4.194. Consultation and engagement demonstrated strong support for maintaining vibrant, accessible and successful city, town and local centres, while recognising that their role must continue to evolve in response to changing shopping patterns, economic conditions and community needs. Respondents highlighted the importance of diversification, regeneration, improved accessibility, protection of valued local services, and reinforcing the distinct identity of individual centres. Together with the extensive evidence base, including the Retail Studies, masterplans and related topic papers, these views have helped shape a policy

framework that the SLP authorities consider supports centres to adapt and thrive, promotes investment and regeneration, protects their vitality and viability, and ensures that city, town and local centres continue to serve as the focus for economic activity, community life and sustainable growth across the SLP area.

4.16. Historic Environment, Character and Place-Making

4.195. Whilst respondents frequently raised housing, transport, climate change and infrastructure issues through consultation and engagement, many also emphasised the importance of conserving the area's rich historic environment whilst addressing these other issues. This included ensuring that future growth respects local character, heritage significance, and the distinct identities of towns, villages and rural communities. Consultation responses demonstrated strong support for protecting heritage assets and the qualities that make places distinctive, whilst generally recognising that heritage considerations should inform and shape growth rather than act as a barrier to sustainable development.

Issues identified

4.196. Many respondents highlighted the contribution that heritage and local character make to community identity, wellbeing and sense of place. Key issues raised included the protection of conservation areas, listed buildings, historic character, local identity, landscape character, settlement identity and the need to create attractive, healthy and well-designed places. Respondents also emphasised the importance of high-quality design and ensuring that new development responds positively to its surroundings.

4.197. Respondents highlighted the close relationship between heritage, placemaking and design quality. Respondents frequently expressed a desire for development that reflects local character, whilst avoiding the erosion of those characteristics that contribute to the identity and distinctiveness of individual communities. Several representations also highlighted the importance of safeguarding the setting of heritage assets, maintaining settlement identity and protecting valued historic landscapes.

4.198. Respondents expressed a strong desire for growth to be accompanied by high-quality placemaking. Respondents frequently referred to the need for development to integrate successfully with existing communities, reinforce local identity and contribute positively to the appearance and function of places.

There was support for creating attractive and healthy neighbourhoods, protecting settlement character and ensuring that new development respects the established form, scale and distinctiveness of towns and villages. The importance of maintaining settlement separation and avoiding the erosion of community identity was also raised by many respondents.

How has this shaped the SLP?

4.199. Responses have informed both the vision, strategic objectives and the wider policy framework relating to heritage, character, design and placemaking. The historic environment and local character have been considered through a comprehensive evidence base, including:

a) Each district council's heritage strategy / action plan;
b) Gloucestershire Historic Environment Record;
c) Conservation Area Appraisals and Management Plans;
d) Housing Density Review;
e) Design Code;
f) Heritage assessments undertaken as part of the Housing and Economic Land Availability Assessment (HELAA) process; and
g) Sustainability Appraisal.

4.200. With this in mind, the SLP seeks to conserve and enhance the historic environment whilst supporting high-quality placemaking that responds appropriately to local character, settlement form, landscape setting and distinctive architectural characteristics. This is reflected through policies relating to heritage assets, locally distinctive design, landscape character, placemaking and the protection of valued environmental and cultural assets. Together these policies seek to ensure that development responds positively to its context and protects the significance of heritage assets and their settings whilst supporting the delivery of sustainable growth.

4.201. The SLP's policy framework reflects the messages received through consultation by placing significant emphasis on design quality, local distinctiveness, landscape setting and the creation of attractive, healthy and sustainable environments.

4.202. The SLP recognises that heritage assets are an irreplaceable resource and that their conservation can make an important contribution to environmental quality, cultural identity, community wellbeing and economic prosperity. Consequently, the SLP includes policies which seek to conserve and enhance designated and non-designated heritage assets, protect archaeological interests, maintain the significance of conservation areas and historic landscapes, and ensure that new development is informed by an understanding of local character and historic context.

4.203. Responses also highlighted the importance of balancing heritage conservation with the need to accommodate growth and respond to contemporary challenges such as climate change. These issues have informed the development of policies that support the sensitive adaptation, enhancement and reuse of existing buildings where appropriate. The climate change evidence supporting the SLP recognises the importance of improving the resilience and energy performance of the existing building stock and acknowledges the role that planning can play in supporting sensitive retrofit, including where historic buildings are concerned. It also recognises that energy-efficiency and climate adaptation measures affecting heritage assets must be carefully balanced against the need to conserve their significance.

4.204. A number of respondents supported the retention and reuse of existing buildings as an alternative to demolition and redevelopment. These comments have been reflected through policies which promote the beneficial reuse of existing buildings where appropriate and recognise the contribution that the adaptation of existing buildings can make towards environmental sustainability, regeneration and the conservation of heritage significance.

4.205. Not all comments received through consultation could be fully reflected within the SLP. A number of representations sought the protection of specific sites, buildings, views or local features, whilst others advocated blanket restrictions on certain forms of development. The SLP is required to establish a strategic planning framework rather than provide detailed management proposals for every individual heritage asset.

Conclusion

4.206. Overall, consultation responses demonstrated strong support not only for the protection of heritage assets and local character, but also for a placemaking-led approach to growth that delivers attractive, distinctive and sustainable places. The feedback received has helped reinforce the importance of heritage, design and local character within the SLP and has informed the development of a policy framework that seeks to balance conservation and change. It is considered that the resulting approach will help ensure that the area's historic environment continues to contribute positively to its identity, attractiveness and prosperity throughout the plan period, whilst accommodating the sustainable growth required to meet future needs.

4.17. Traveller, Gypsy and Travelling Showpeople Provision

4.207. The accommodation needs of Gypsies, Travellers and Travelling Showpeople formed a specific component of the Regulation 18 consultation and attracted a range of responses relating to future provision.

Issues identified

4.208. Responses demonstrated broad recognition that the accommodation needs of Gypsies, Travellers and Travelling Showpeople should be addressed through the Plan in the same way as other forms of housing need. Respondents emphasised the importance of identifying sufficient sites, ensuring that provision is appropriately located and supporting access to services, facilities and employment opportunities. Furthermore, the importance of balancing community integration with the needs and preferences of traveller households, including the importance of family networks, operational requirements and cultural considerations.

4.209. Respondents generally focused on how accommodation needs should be met, where future provision should be located and the characteristics of suitable sites. Issues raised included whether provision should be incorporated within wider strategic developments, the merits of alternative approaches to site delivery, appropriate site characteristics, suitable locations and the importance of ensuring that identified accommodation needs are met in full. Also highlighted was the need to balance accessibility to services and facilities with the operational and cultural requirements of the communities.

4.210. Generally, respondents emphasised the need for a robust evidence base to support decisions regarding site provision and location. Future provision should be sustainably located, supported by infrastructure and informed by a clear understanding of need. Responses also highlighted the importance of ensuring that any strategy is deliverable and capable of addressing identified accommodation requirements over the plan period.

4.211. Responses have been supplemented by extensive evidence gathering and targeted engagement undertaken through the preparation of the

Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA included a comprehensive programme of stakeholder engagement involving local authorities, service providers, Traveller liaison services, site managers, neighbouring authorities, representative bodies and third-sector organisations. Stakeholders consistently highlighted a shortage of authorised sites and pitches across the wider area, resulting in overcrowding, concealed households and limited opportunities for new household formation. Stakeholders also identified challenges associated with land availability, planning constraints, viability considerations and community opposition to new provision.

4.212. The GTAA included visits to all Gypsy, Traveller and Travelling Showpeople sites. Visits were undertaken to all known sites and yards, and discussions were held with households and family representatives regarding accommodation circumstances, future aspirations, accommodation needs and barriers to securing suitable provision. This engagement provided an important opportunity to directly involve communities that are often underrepresented in consultation exercises and ensured that the evidence base was informed by first-hand experiences and locally specific needs. The assessment highlighted the importance of family networks, the need to accommodate newly-forming households, pressures arising from overcrowding and concealed households, and the strong preference of many households to remain within existing family and community networks where possible.

4.213. Engagement with Travelling Showpeople households reinforced the importance of recognising the distinct characteristics and requirements of the community. For example, that accommodation and business needs are often intrinsically linked, with plots serving not only as residential bases but also providing space for equipment storage, maintenance activities and business operations. Respondents emphasised the importance of enabling family succession, supporting established businesses and providing sufficient space to accommodate both residential and operational requirements.

How has this shaped the SLP?

4.214. Consultation responses and the GTAA have directly informed the accommodation strategy contained within the SLP and the supporting topic paper. Accommodation needs have been assessed through the GTAA 2026, with potential opportunities for delivery considered through the HELAA process, site assessment work and other evidence. The strategy recognises that need is influenced not only by demographic growth and household formation, but also by overcrowding, concealed households, cultural preferences, family networks and the availability of suitable authorised accommodation.

4.215. A key message emerging from consultation and stakeholder engagement was the importance of identifying suitable and sustainable locations for future provision. Whilst views differed regarding the most appropriate approach, there was broad recognition that sites should have reasonable access to services, facilities and transport networks whilst also recognising the particular needs of the communities concerned.

4.216. The resulting SLP policy H11 includes criteria against which proposals should be assessed, including consideration relating to accessibility, landscape impact, residential amenity, flood risk, drainage, utilities, servicing requirements and site design. These criteria seek to ensure that future provision is both sustainable and deliverable.

4.217. In order to maintain accommodation for traveller communities, SLP policies protect existing authorised sites, identifies opportunities for the appropriate extension or intensification of existing provision where justified, identifies new provision through site allocations, areas of search and relevant strategic developments. The criteria based policy will be used to assess potential windfall opportunities. This reflects consultation feedback that a range of delivery mechanisms will be required to meet identified needs and provide flexibility over the plan period. The SLP also recognises the accommodation needs of boat dwellers and establishes a framework through which relevant proposals can be considered.

4.218. Not all consultation responses could be directly reflected within the SLP. A number of respondents objected to any new provision being made within

particular locations or communities, whilst others advocated restrictions that would severely limit opportunities to meet identified accommodation needs. However, the SLP authorities are committed to providing accommodation in appropriate locations and this is reflected in the overall strategy of the Plan. The Plan seeks to balance identified needs, sustainability considerations, environmental constraints and community impacts through a structured site assessment and policy framework.

4.219. Similarly, consultation responses highlighted differing views regarding the need for transit provision and negotiated stopping arrangements. Evidence gathered through the GTAA indicated that travelling patterns are increasingly diverse, unauthorised encampments remain relatively low and stable, and there is no clear consensus regarding the scale of future transit need. Consequently, the approach in the SLP has been informed by the available evidence and seeks to maintain sufficient flexibility to respond to future circumstances without imposing requirements that cannot currently be robustly justified.

Conclusion

4.220. Overall, consultation responses, stakeholder engagement and direct discussions with Gypsy, Traveller and Travelling Showpeople households have played an important role in shaping the SLPs approach to accommodation provision. The resulting strategy is evidence-led, informed by direct engagement with the communities concerned and supported by a comprehensive understanding of accommodation needs, delivery constraints and future opportunities. The Councils consider that this approach provides a robust and proportionate framework for meeting identified needs whilst ensuring that future provision is sustainable, deliverable and responsive to the diverse requirements of Gypsies, Travellers, Travelling Showpeople and boat dwellers across the plan area.

4.18. Young People

4.221. Engaging with young people formed an important part of the Spatial Options and Key Policy Areas consultation, with activities designed for and by young people. The SLP authorities recognise that young people will experience the long-term consequences of the SLP more than others, and yet are a group that traditionally has been hard to reach and difficult to engage in local plan consultations. With this in mind, the councils sought to ensure that their views were reflected in the development of the Plan. Engagement was therefore undertaken with young people from across the plan area to better understand their aspirations, concerns and priorities for the future of the area. The detailed outcomes of this engagement are set out in the Young People report to the Regulation 18 Consultation Report at Appendix 4.

Issues identified

4.222. The engagement generated a distinct set of responses which broadly reinforced many of the themes emerging from the wider consultation. Young people's priorities included climate change action, the protection of green spaces, biodiversity enhancement, sustainable development, affordable housing, improved public transport, employment opportunities, access to community facilities and the creation of attractive places to live and work. There was also a clear preference for the Sustainable Transport scenario explored through the earlier Spatial Options and Key Policy Areas consultation, reflecting a desire for future growth to be directed towards locations where sustainable travel choices are available and communities are less dependent on private car ownership.

4.223. Housing emerged as one of the most significant issues raised. Young people expressed concerns regarding housing affordability and their ability to access suitable housing within the area in the future. Many highlighted the importance of providing a range of housing types and tenures, supported by access to employment opportunities, community facilities and infrastructure. This feedback reinforced wider consultation responses regarding the need to deliver sufficient homes, improve affordability and create balanced communities capable of meeting the needs of a diverse population.

4.224. Climate change and environmental protection also featured prominently throughout the engagement. Young people consistently highlighted the importance of taking meaningful action to address climate change, protect wildlife and biodiversity and improve the quality of the natural environment. There was strong support for protecting green spaces, enhancing biodiversity and creating places that are environmentally sustainable and resilient to future challenges. These themes closely aligned with wider consultation responses relating to climate change, nature recovery and green infrastructure.

4.225. Transport and connectivity were another key priority. Young people highlighted the importance of being able to access education, employment, services, leisure opportunities and community facilities through affordable, reliable and sustainable transport options. Responses reinforced the importance of public transport, walking and cycling connections and demonstrated clear support for development patterns which reduce dependence on private vehicles and improve accessibility.

4.226. The importance of future employment opportunities and economic prosperity was also frequently highlighted. Young people wanted to see a strong local economy capable of supporting a wide range of employment opportunities in the future. Responses emphasised the importance of supporting economic growth, enabling access to jobs and skills and ensuring that younger generations are able to remain within the area to live and work.

4.227. Young people also placed considerable importance on the quality of places and community life. Responses highlighted the value of accessible green spaces, leisure facilities, sports and recreation opportunities, community facilities and places where people can meet and socialise. There was strong support for creating attractive, well-designed communities that foster a sense of belonging, community pride and wellbeing.

How has this shaped the SLP?

4.228. The priorities identified through the dedicated young people's engagement have been considered alongside the wider Regulation 18 consultation responses in the development of the SLP.

4.229. These priorities have been embedded throughout the Plan as a whole. They are reflected in the Vision and Strategic Objectives and have influenced the development of the Spatial Strategy, particularly the emphasis on sustainable transport, infrastructure-led growth, climate resilience and well-designed places. The engagement reinforced the importance of directing growth towards locations where access to services, facilities and sustainable transport opportunities can be maximised, whilst supporting healthy and connected communities.

4.230. The influence of the engagement can also be seen throughout the policy framework. Themes raised by young people are reflected in policies relating to affordable housing, housing mix, sustainable transport, climate change, biodiversity, nature recovery, green and blue infrastructure, community facilities, health and wellbeing, employment opportunities and the quality and design of new development. Whilst many of these issues were also raised through the wider consultation process, the engagement demonstrated that they are of particular importance to younger generations and reinforced the need for the Plan to respond to their long-term aspirations.

4.231. Not all views expressed by young people could be translated directly into planning policy. Some matters raised related to the operation of public services, public transport provision, education, funding decisions and wider social and economic issues that sit beyond the direct scope of a local plan. Nevertheless, these views helped shape the overall direction of the Plan and provided valuable insight into the priorities of future generations who will live, work and study in the area over the coming decades.

4.19. Housing and Economic Land Availability Assessment (HELAA) methodology and site submissions

4.232. The HELAA methodology was published for consultation, following the preparation of a shared methodology for the SLP authorities. Consultation on the draft Housing and Economic Land Availability Assessment (HELAA) methodology generated responses from a range of stakeholders, including land promoters, planning consultants, statutory consultees, Gloucestershire County Council, Historic England and Gloucestershire Wildlife Trust. Comments focused on how sites should be assessed, the treatment of environmental and heritage constraints, accessibility considerations, density assumptions and the relationship between the HELAA process and the wider SLP.

Issues identified

4.233. A recurring theme was the treatment of policy and environmental designations. Several respondents argued that the draft methodology was overly restrictive in relation to sites within the Cotswolds National Landscape (formerly AONB), while others sought greater clarity regarding Green Belt sites and the role of settlement boundaries.

4.234. A number of consultees highlighted the need for stronger consideration of accessibility and sustainable transport. Gloucestershire County Council in particular requested that site assessments consider the ability of sites to access services, facilities and high-frequency public transport.

4.235. Environmental organisations and statutory bodies raised issues relating to biodiversity and heritage assets. Gloucestershire Wildlife Trust sought stronger protection for Local Wildlife Sites, while Historic England recommended broadening the treatment of Registered Parks and Gardens and strengthening consideration of heritage impacts.

4.236. Responses from developers and land promoters emphasised the importance of reflecting current national planning policy, making efficient use of land and

ensuring that sites were not discounted solely because of existing policy constraints.

4.237. The consultation also highlighted the need for greater transparency and clarity in how sites are assessed.

How did this shape the methodology?

4.238. In response, the methodology was amended so that location within the Cotswolds National Landscape is no longer treated as an exclusion criterion. Instead, such sites will be assessed against landscape evidence and the wider development strategy. The methodology was also revised to clarify that a site's relationship to an existing settlement should inform, but not automatically prevent, further assessment, recognising that some isolated or employment-focused sites may still warrant consideration through the plan-making process.

4.239. As a result, the final methodology incorporates Department for Transport (DfT) Connectivity Scores as part of the assessment framework, providing a more robust and consistent measure of accessibility across the plan area.

4.240. The methodology now explicitly identifies Local Wildlife Sites and Reserves as potentially unsuitable for development unless impacts can be adequately mitigated. The methodology was also amended to recognise all Grade I, Grade II* and Grade II Registered Parks and Gardens as constraints within the assessment process. In addition, the assessment process now includes greater input from conservation specialists where heritage impacts may arise.

4.241. The methodology was updated to include revised density assumptions aligned with the National Model Design Code and the December 2024 NPPF. Additional clarification was also provided regarding how existing development plan policies, site constraints and future evidence studies should be taken into account during assessment.

4.242. The final methodology includes a more comprehensive assessment framework, expanded site assessment criteria, clearer definitions of availability, suitability and achievability, and additional explanatory text throughout the document. The

methodology now also references emerging evidence such as the Green Belt Review, Strategic Flood Risk Assessment, Local Nature Recovery Strategy and future landscape evidence, ensuring that HELAA assessments are informed by the most up-to-date evidence available.

4.243. A large number of responses related to site-specific matters, have been reviewed. These have been taken into account in the preparation of the Regulation 19 Plan and supporting evidence. Site-specific issues raised through consultation have been considered alongside the wider technical evidence and plan-making requirements in determining whether sites should be taken forward and, where appropriate, in identifying matters requiring further consideration through site-specific requirements, concept planning and subsequent stages of the development process. Where possible, updates, corrections and amendments have been made to the Plan and supporting evidence in response to matters identified through the consultation.

Conclusion

4.244. Overall, the engagement demonstrated strong support for sustainable communities, affordable housing, climate action, environmental enhancement, improved transport connections, employment opportunities, community facilities and high-quality placemaking. The feedback received helped reinforce many of the key principles underpinning the Strategic and Local Plan and ensured that the views of younger generations were considered throughout the evolution of the strategy, policies and site allocations. The Councils consider that this engagement has helped strengthen the Plan's ability to respond not only to current challenges and opportunities, but also to the aspirations of those who will experience its long-term outcomes.

4.20. Site Submissions and Land Availability

4.245. The consultation generated a substantial number of new site submissions and updates to existing promoted sites. Respondents identified land for a range of potential uses including housing, employment, renewable energy, commercial development and traveller accommodation. All submissions were taken forward for assessment through the Housing and Economic Land Availability Assessment process.

- Key issues raised included:
- Suitability of promoted sites.
- Deliverability and availability.
- Infrastructure requirements.
- Environmental constraints.

How has this shaped the SLP?

4.246. Sites submitted through consultation and the call-for-sites process have been assessed through the Housing and Economic Land Availability Assessment (HELAA) and HELAA Methodology. The assessment considers site suitability, availability, achievability and development potential, including relevant physical and environmental constraints. The HELAA Methodology specifically includes consideration of flood risk and geographic, topographic and highways constraints.

4.247. The HELAA provides the starting point rather than the final decision on site allocation. Potential allocations have subsequently been considered having regard to the Sustainability Appraisal, Urban Capacity Studies, Settlement Hierarchy evidence, Green Belt Assessment, landscape evidence, Strategic Flood Risk Assessment, transport evidence, ecological and heritage evidence and wastewater and infrastructure evidence, as relevant to individual sites.

4.248. The resulting strategic and non-strategic allocations therefore reflect the wider assessment and plan-making process, with appropriate policy requirements, safeguards, infrastructure and mitigation incorporated where supported by the evidence.

4.21. Effective Cooperation with Neighbouring Authorities and other bodies

4.249. Alongside public consultation, the SLP authorities have undertaken extensive engagement has been undertaken with neighbouring authorities and other organisations. Initially, this was as part of the 'duty to cooperate' legal requirement, but it now progressed through the 'Effective engagement' expectation as set out in national planning policy. This is a requirement to engage proactively and constructively with neighbouring authorities, statutory consultees, infrastructure providers and other strategic partners through the preparation of the SLP.

4.250. Engagement has taken place through formal consultation exercises, officer and member meetings, technical workshops, joint evidence studies, countywide working groups and ongoing dialogue with relevant organisations. This collaborative approach has helped shape the plan's response to a range of strategic issues, including housing and employment needs, transport and infrastructure provision, climate change, flood risk, nature recovery, green infrastructure, health and utilities. The preparation of a number of shared evidence studies and continued engagement on emerging policy approaches has also helped ensure that strategic planning issues are considered consistently across Gloucestershire and neighbouring areas.

4.251. Further detail on the organisations engaged, the matters discussed and the outcomes of this collaboration is set out in the accompanying Statement of Cooperation [PUT IN WEBLINK?], which demonstrates how partner involvement has informed and strengthened the SLP. The SLP authorities will continue to work closely with strategic partners through ongoing engagement and the preparation of Statements of Common Ground throughout the ongoing plan process.

5. Conclusions and next steps

5.1. This Consultation Statement demonstrates how the SLP authorities have undertaken meaningful, proportionate and effective engagement throughout the preparation of the SLP. It sets out who was consulted, the methods used to engage communities, stakeholders and prescribed bodies, the issues and matters raised through consultation, and how those representations have informed the evolution of the Plan.

5.2. The preparation of the SLP has been an iterative process, with consultation playing an important role in shaping the vision, objectives, spatial strategy and policy framework. Feedback received at each stage has been carefully considered alongside the evidence base, national policy and other material considerations. Where appropriate, changes have been made to the SLP in response to consultation, while in other cases comments have informed further evidence gathering, or the justification for the approach taken.

5.3. This Statement demonstrates that the SLP authorities have fulfilled their commitments to consultation and engagement in accordance with their adopted Statements of Community Involvement. It also provides evidence that the authorities have met the relevant legal and procedural requirements governing the preparation of local plans, including the consultation requirements prescribed by planning legislation and regulations.

Next steps – Regulation 19

5.4. It is important to note that the Regulation 19 stage of plan preparation is not a further consultation on the content of the SLP. Rather, it is a formal representation stage prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. At this stage, interested parties are invited to submit representations on whether the Plan satisfies the statutory requirements and whether it is considered sound.

5.5. In particular, representations are invited on:

I. Whether the Plan has been prepared in accordance with the legal and procedural requirements, including the Duty to Co-operate and other relevant legislative and regulatory obligations; and
II. Whether the Plan is sound. The National Planning Policy Framework states that plans are sound where they are:

    a. Positively prepared;
    b. Justified;
    c. Effective; and
    d. Consistent with national policy.

5.6. The purpose of the Regulation 19 representation period is therefore not to revisit all matters previously considered through earlier plan-making stages, but to enable interested parties to make representations on the legal compliance and soundness of the submitted Plan. Representations received during the publication period will be submitted alongside the SLP for independent examination by a Planning Inspector appointed by the Secretary of State.

5.7. Following the completion of Regulation 19 Publication, representations will be reviewed and key messages understood, before presenting to each partner Council.

Appendices

Appendix 1 - Evidence base document summary

See Appendix 3 of Council report.

Appendix 2 – Specific and general consultation bodies

Specific consultees

- British Gas
- Canal and River Trust
- Canal & River Trust
- Mining Remediation Authority
- Gloucestershire County Council - Education
- Gloucestershire County Council - Lead Local Flood Authority
- Gloucestershire County Council - Minerals Planning & Waste Disposal
- Gloucestershire County Council - Waste and Minerals Planning
- Gloucestershire County Council - Planning
- Gloucestershire County Council - Social Services
- Crown Estates Commissioners
- South West Net Zero Hub
- Department for Energy Security and Net Zero
- Department for Science, Innovation and Technology
- Department for Business and Trade
- Environment Agency
- Forestry Commission
- Garden Trust
- Health and Safety Executive
- Nationally Significant Infrastructure Projects
- Highways England
- Historic England
- General Flood Risk Management Enquiries
- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- Gloucester City Council
- Tewkesbury Borough Council
- Marine Management Organisation

- National Gas Transmission
- National Grid
- National Parks Authorities
- Natural England
- Network Rail
- Office of Rail and Road
- Great Western Railway
- Sport England
- Thames Water
- Theatres Trust
- Severn Trent
- Gloucestershire County Council - Archaeology
- Gloucestershire County Council - Heritage
- Gloucestershire County Council - Asset Management
- Gloucestershire County Council-Environment Department
- Gloucestershire County Council - Ecology
- Gloucestershire County Council - Transport
- Gloucestershire County Council - Public Health
- Gloucestershire County Council Public Rights of Way
- Gloucestershire County Council Waste and Recycling
- Gloucestershire County Council Libraries
- Gloucestershire County Council Minerals and Waste
- Gloucestershire County Council Education
- Gloucestershire County Council Strategic Planning
- Worcestershire County Council
- Monmouthshire County Council
- Herefordshire County Council
- South Gloucestershire Council
- Wychavon & Malvern Hills District Council
- Forest of Dean District Council
- Stroud District Council
- Malvern Hills District Council
- South Worcestershire District Local Plan
- Glos Police & Crime Commissioner

- Churcham Parish Council
- Rudford and Highleadon Parish Council
- Hartpury Parish Council
- Corse Parish Council
- Eldersfield Parish Council
- Bushley Parish Council
- Ripple Parish Council
- Strensham Parish Council
- Bredon, Bredons Norton and Westmancote Parish Council
- Kemerton Parish Council
- Overbury Parish Council
- Beckford Parish Council
- Ashton Under Hill Parish Council
- Sedgeberrow Parish Council
- Aston Somerville Parish Council
- Childswickham Parish Council
- Broadway Parish Council
- Brookthorpe-with-Whaddon Parish Council
- Cranham Parish Council
- Elmore Parish Council
- Hardwicke Parish Council
- Haresfield Parish Council
- Upton St Leonards Parish Council
- Hunts Grove Parish Council
- Brimpsfield Parish Council
- Coberley Parish Council
- Dowedeswell Parish Council
- Whittington Parish Council
- Sevenhampton Parish Council
- Hazelton Parish Council
- Notgrove Parish Council
- Naunton Parish Council
- Guiting Power Parish Council
- Temple Guiting Parish Council

- Cutsdean Parish Council
- Burton on the Hill Parish Council
- Blockley Parish Council
- Chipping Campden Parish Council
- Cotswolds National Landscape
- EDF Energy
- EE
- Forestry England
- Georgian Group
- Gloucester City Council
- Gloucestershire Constabulary
- Homes England
- Mobile UK
- National Grid
- National Highways
- Natural England
- npower
- O2
- Openreach
- Property Cheltenham
- Regulator of social housing
- Scottish Power
- Severn Trent Water Limited
- Sport England
- Tewkesbury Borough Council
- Three
- Transport for London
- Virgin Media
- Wales & West Utilities
- Water Regs UK
- Water UK
- Western Power Distribution
- Wiltshire County Council

General consultees

- Active Gloucestershire
- Age UK
- All Saints Academy
- Alzheimers Society
- Anchor Trust
- Barnwood Trust
- British Beer and Pubs Association
- Campaign for Real Ale
- Campaign to Protect Rural England, Gloucestershire's branch
- Caring for Communities and People
- Cheltenham & Tewkesbury Cycling Campaign
- Cheltenham Alliance for Race Equity
- Cheltenham Bangladeshi Association
- Cheltenham College
- Cheltenham Connect
- Cheltenham Education Partnership
- Cheltenham Hebrew Congregation
- Cheltenham Inter Faith
- Cheltenham YMCA
- Church Commissioners
- Civic Trust
- Civil Aviation Authority
- Civil Service Sports Council
- Cotswold Conservation Board
- Campaign to Protect Rural England (CPRE) Gloucestershire
- Defence Infrastructure Organisation
- Department for Transport
- Dept Digital, Culture, Media and Sport
- Elim Housing
- Federation of Small Businesses
- Freight Transport Association
- Friends Families and Travellers

- Friends of Alney Island
- Gloucestershire Association of Parish and Town Councils (GAPTC)
- GayGlos
- GL Communities
- Gloucestershire Care Providers Association
- Gloucestershire Fire & Rescue Service
- Gloucester Chamber of Commerce
- Gloucester City Homes
- Gloucester Civic Trust
- Gloucester Culture Trust
- Gloucester Diocese
- Gloucestershire Action for Refugees & Asylum Seekers (GARAS)
- Gloucestershire Archives
- Gloucestershire Carers Hub
- Gloucestershire Clinical Commissioning Group
- Gloucestershire Centre for Environmental Records
- Gloucestershire College
- Gloucestershire Deaf Association
- Gloucestershire Football Association
- Gloucestershire Geology Trust
- Gloucestershire Health and Care NHS Foundation Trust
- Gloucestershire Hospitals Foundation Trust
- Gloucestershire Hospitals NHS Trust
- Gloucestershire Integrated Care Board
- Gloucestershire Local Nature Partnership
- Gloucestershire NHS - Property/Student Accommodation
- Gloucestershire NHS Health and Care Trust
- Gloucestershire Orchard Trust
- Gloucestershire Orchard Trust
- Gloucestershire Playing Fields Association
- Gloucestershire Rural Community Council
- Gloucestershire Sight Loss Council
- Gloucestershire Voluntary and Community Sector Alliance
- Gloucestershire Warwickshire Steam Railway

- Gloucestershire Wildlife Trust
- Great Western Railway
- Guinness Partnership
- Hartpury College
- Hartpury University & Hartpury College
- Hempsted Residents Association
- Home Builders Federation
- Homes England
- House of Commons
- Housing Enabling
- Hucclecote Community Association
- Kingfisher Treasure Seekers
- Kingsholm and Wotton Neighbourhood Partnership
- Lives of Colour
- Llanthony Secunda Priory Trust
- Lower Severn Internal Drainage Board
- Mobile UK
- Muslim Youth UK
- National Farmers Union
- National Playing Fields Association
- National Trust
- National Federation of Gypsy Liaison Groups
- NHS Community and Mental Health
- NHS Gloucestershire Clinical Commissioning Group
- Platform Housing Group
- Play Gloucestershire
- Pride in Gloucestershire
- Ramblers Association
- RSPB
- Sanctuary Housing
- Showmen's Guild of Great Britain - Western Section
- South West Councils
- South West HARP Planning Consortium
- South Western Ambulance Service Trust

- Southern Electric
- Sovereign
- Stagecoach West
- SUSTRANS
- Cotswolds National Landscape
- Gloucester Charities Trust
- Showmen's Guild of Great Britain
- The Traveller Movement
- Together in Matson
- Two Rivers Housing
- University of Gloucestershire
- University of Gloucestershire
- Vodafone
- Wessex Water
- West Cheltenham Greenbelt Group
- Western Power Distribution
- Western Power Distribution
- White City Community CIC / Maston, Robinswood, White City Community Partnership.
- William Paige Limited
- Woodland Trust
- Young Gloucestershire
- Young Gloucestershire
- Tewkesbury Churches Together
- Inclusion Gloucestershire
- Advance
- Age UK Gloucestershire
- Aim Up
- Benhall Residents' Association
- Brizen Young Peoples' Centre
- Bromford Housing Group
- Building with Nature
- Cheltenham Borough Council (Environmental Health)
- Cheltenham Borough Council (Flooding)
- Cheltenham Borough Council

- Cheltenham Green Spaces
- Cheltenham West End Partnership
- Cheltenham Welcomes Refugees
- Cheltenham Youth Work Network
- Cottsway Housing
- Department for Education
- Gloucester Community Networking
- Gloucestershire Warwickshire Steam Railway
- Guinness Partnership
- Green Square Accord
- Hester's Way Neighbourhood Forum
- Hester's Way Partnership
- Housing21
- Inclusion Gloucestershire
- Insight Gloucestershire
- LiveWest
- Open Door Cheltenham
- Railfuture
- Riverside
- Rooftop Housing
- Sanctuary Homes
- Sovereign Network Group (formerly Sovereign Housing Association)
- Tewkesbury Road Rest Garden
- The Butterfly Garden
- Trustees of the Battledown Estate
- Two Rivers Housing
- Vision21
- War Memorials

Appendix 3 – Phase 1 - Spatial Options and Key Policy Areas (Regulation 18): Workbook of all representations

Download document – Spatial Options and Key Policy Areas (Regulation 18): Workbook of all representations - opens a separate document.

Appendix 4 – Phase 1 - Spatial Options and Key Policy Areas (Regulation 18): Consultation summary report

Download document – opens separate documents:

Regulation 18 – Spatial Options and Key Policy Areas Consultation Report (January 2025)

Appendix 1 – Questionnaire

Appendix 2 – Young People

Appendix 3 – In person events

Appendix 4 – Online workshops

Appendix 5 - Sites

Vision and Strategic Objectives Topic Paper

Respondents to the 'Draft Vision' project have expressed a variety of concerns and suggestions regarding the future development of their area. A recurring theme is the need for sustainable development, with a focus on preserving green spaces and heritage. There is a strong emphasis on improving public transport and creating walkable neighbourhoods to reduce reliance on cars.

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

Decarbonisation and meeting climate change targets are considered crucial, with calls for bold action and consideration of carbon impact in all development choices. Some respondents suggest using the Gloucestershire Green Belt for development due to its proximity to services and potential for increasing biodiversity.

There are also critical voices questioning the assumptions behind the project, demanding transparency, and challenging the potential profit motives of developers. The idea of building on the Gloucestershire Airport site to provide housing is proposed, with the argument that other airports are sufficient for the region's needs.

Finally, some respondents call for a more concise and impactful vision statement while others stress the importance of retaining key facilities like the airport to attract businesses and balance the demographic shift towards a retirement town. The provision of key worker housing, particularly for health and care sectors, is highlighted as a critical need.

82 responses in total.

Spatial Options Topic Paper

The headline outcomes of the Spatial Options consultation were that:

- Option 1 received a degree of support, principally from promoters, for its transport corridor approach/the planning of strategic sites in locations which are well connected to the existing built-up areas. However, this approach received a strong degree of criticism from residents for the release of Green Belt land and the impact of new development on already stretched local infrastructure. Many of these comments were focussed around the impact to Churchdown/Chosen Hill.
- Option 2 received the strongest support from promoters and specific bodies, but also, together with Option 1, attracted a significant amount of objections from residents with concerns predominantly focussed around the Green Belt release, existing infrastructure capacity and impact to Churchdown/Chosen Hill.
- Option 3 received the strongest support from residents, predominantly due to the avoidance of Green Belt release, protection of landscape, biodiversity and prevention of coalescence between settlements.
- Option 4 received the least support of all options presented. The limited support that it did receive, however, focussed on the reduced overreliance on large sites to deliver growth. Key criticisms of the strategy centred around car dependence, harm to the character of villages and inconsistency with national policy.

258 responses in total.

City, Town and Local Centres Topic Paper

Respondents mainly supported making centres more mixed-use, accessible and resilient, but many felt the paper needs a clearer long-term vision and stronger policy direction, especially on the roles of Cheltenham and Gloucester, the centre hierarchy, and how centres will support wider economic growth.

A common theme was transport and accessibility. Responses backed prioritising walking, cycling and public transport, improving connectivity, and resisting further out-of-town retail unless it is well linked by sustainable travel. Several also wanted stronger action to reduce dependence on cars and improve public realm, safety and cleanliness so centres can better compete with retail parks.

Another repeated issue was the future of retail and town centres. Respondents highlighted the need to avoid vacant shopfronts, support pop-up and temporary uses, and bring more homes into centres, particularly flats above shops, to boost footfall and everyday activity. There were also calls for clearer policies to restrict, rationalise or repurpose out-of-centre retail parks.

Green infrastructure, biodiversity and access to nature were also strongly emphasised. Respondents welcomed references to these issues but wanted much more weight given to urban nature, wildlife connectivity, links to nearby green and blue spaces, and nature-based flood management such as SuDS, green roofs and rain gardens. Similar support was expressed for embedding ecology and green infrastructure more consistently across planning.

Some responses highlighted gaps around skills, education and workforce development. One argued that thriving centres need skilled workers, better education and training capacity, affordable housing and good transport links, especially given future job disruption from AI.

Other points raised included the need to recognise archaeology and non-building heritage assets in centres address affordability and retrofit challenges in historic buildings and ensure the plan stays aligned with broader economic strategies and an “open for business” approach.

Seven responses in total.

Retail and Town Centres Study – Phase 1

The strongest recurring point was that town centres and high streets are changing, with less demand for traditional retail. One respondent said underused retail space should be repurposed, particularly for housing, alongside protecting and improving green spaces for nature and recreation

There was also support for making better use of Tewkesbury's waterside as a visitor destination. Suggestions included creating a stronger riverside attraction centred on boating and leisure, improving facilities such as public toilets, better dog waste management, and clearer signage from the M50, with the aim of boosting visitor numbers and supporting local businesses

Another theme was heritage and design quality, with a call for traditional architecture design codes for all new development and strong protection for older buildings, including a ban on demolishing buildings built before 1950

4 responses in total.

Housing Density Topic Paper

Most respondents supported the general aim of making more efficient use of land and increasing housing density, but the strongest recurring theme was that density must be context-sensitive rather than applied as a blanket standard. Many said density should reflect local character, site constraints, housing mix, infrastructure capacity and placemaking objectives, with several explicitly supporting an "optimum" rather than simply maximum density approach.

A clear split emerged over how ambitious the plan should be. Some respondents argued the paper is too cautious and should push much harder for higher densities, especially in Cheltenham and in centres, around rail stations and on brownfield/car park sites. They called for more mid-rise development, more mixed-use schemes and denser forms to reduce sprawl, protect countryside and improve affordability. Ashchurch Garden Community at 35–40 dph was repeatedly cited by pro-density respondents as a missed opportunity.

Others, especially land/promoter and planning respondents, warned that the paper may overestimate what can realistically be achieved on large sites. They stressed that strategic landscaping, trees and hedgerows, biodiversity mitigation and BNG, flood risk, SuDS, utilities, heritage settings, schools, community facilities, open space, roads and active travel infrastructure all reduce net developable area. They argued that unrealistic assumptions could lead to under-allocation of land and later housing shortfalls. Several also emphasised that local housing need points to a high proportion of family housing, which limits how far densities can rise.

Infrastructure was one of the most common concerns across responses. Respondents broadly accepted that higher densities can support better public transport and local services, but only if development is located in the right places and phased with infrastructure. Several said higher density in poorly connected or car-dependent areas could worsen congestion and traffic impacts, including on the strategic road network. There was support for focusing denser development around high-frequency bus corridors, BRT routes and rail stations, though one response questioned how much land around stations is actually available.

Another strong theme was that higher density should not come at the expense of quality. Respondents repeatedly mentioned the need for good internal space standards, daylight, amenity, open space, greenery, trees and blue-green infrastructure, as well as inclusive design and good design coding. Some saw higher density as compatible with attractive urban forms, including Regency, Victorian or Georgian-inspired development in Cheltenham, while others warned against cramped layouts, poor parking arrangements and weak external environments.

Several respondents also said the paper needs stronger evidence and implementation detail. Suggestions included reviewing actual recent permissions and achieved densities, quantifying how much extra capacity higher assumptions would produce, monitoring delivery, and better linking the density paper to other evidence on urban capacity, green infrastructure and BNG.

Overall, respondents largely agreed with the principle of increasing density, but the main debate was whether the paper is still not ambitious enough, or whether its assumptions are already too optimistic once real-world constraints, infrastructure and housing mix are taken into account.

14 responses received.

Residential Above Shops Topic Paper

This topic paper explored the contribution that the use of vacant floors above shops in the main city and town centres could make to meeting development needs. Very few people responses, however those that did expressed strong support for increasing residential use above shops as a way to boost housing supply, revitalise town centres and make better use of underutilised upper floors. Many felt that planning policy should take a more positive and enabling approach, with fewer barriers to conversion and greater support for town-centre living. Concerns were raised that current policy can be overly cautious, with obstacles including noise constraints, access requirements, servicing arrangements, waste storage, absentee ownership and the challenges of adapting heritage buildings. There were calls for clearer and more practical guidance, particularly for listed buildings and conservation areas, alongside a more flexible approach to standards where this would help bring vacant space back into productive use.

Furthermore, respondents supported broader town-centre densification through additional storeys, mansard roofs and a wider mix of residential formats, including shared living and HMOs. However, this support was tempered by a strong desire to retain active ground-floor frontages, protect historic shopfronts and ensure that development respects the character, heritage and vitality of centres. Overall, respondents favoured a more ambitious and enabling policy framework that actively promotes living above shops as part of town-centre regeneration, while balancing heritage protection, good design and the continued function of vibrant high streets.

Two responses in total

Strong opposition centres on building on Green Belt/open countryside, especially around Churchdown/Chosen Hill, White House Farm, and the Chargrove/Brizen Farm/Shurdington area. The most repeated concern is that development would erode the remaining gap between Gloucester and Cheltenham, or between Up Hatherley and Shurdington, leading to urban sprawl and loss of village identity.

Traffic and infrastructure are the other dominant themes. Many say local roads are already at or beyond capacity, with particular pressure on Cheltenham Road East, Parton Road/Pirton Lane, Churchdown Lane, Brookfield Road and the A46/Shurdington Road. Respondents repeatedly mention gridlock at school times, unsafe access, and the lack of capacity for more vehicles. GP surgeries, schools, dentists, sewage, water and utilities are widely described as already overstretched, with no confidence that extra provision would arrive in time.

Loss of wildlife and green space is mentioned throughout. Respondents refer to deer, foxes, badgers, bats, birds of prey, owls, otters, great crested newts and other species, arguing that fields, hedgerows, orchards, brooks and hillsides are important habitats and wildlife corridors. Many also stress the role of these spaces in walking, running, cycling, dog walking, children's play, mental health and general wellbeing, especially around Churchdown Hill/Chosen Hill and Chargrove Lane.

Flood risk and drainage are also very common objections. Many describe fields as natural soakaways or water sinks and fear that replacing them with hard surfaces will worsen flooding locally and downstream. This is raised particularly for Churchdown sites, White House Farm, Parton Farm, Chargrove and Brizen Farm, as well as Apperley.

Churchdown attracts the highest volume of concern overall. Repeated objections focus on CHU015, CHU035, CHU010, CHU024, CHU036 and HUC001, with residents saying the village has already taken too much development and cannot absorb more without losing its character and functioning as little more than an urban extension. Several also raise concerns about airport proximity and flight-path safety/noise for CHU015/CHU035 near Gloucestershire Airport.

A second major cluster of objections concerns Chargrove Lane/Brizen Farm/Shurdington Road. These responses repeatedly describe the area as a highly valued rural landscape

and heavily used local green space, with many citing the 2018 refusal of housing on the Chargrove Triangle and saying nothing has changed except worsening traffic and loss of other green spaces.

There are also concerns about consultation and transparency. Some respondents say they were poorly informed, found the process hard to navigate, or had too little time to respond, especially for Chargrove and Churchdown proposals.

A smaller number of responses support or promote development, mainly from landowners/agents. These generally argue for Green Belt release or "grey belt" treatment in sustainable locations, support spatial option 2, and promote sites near Churchdown, South Cheltenham, north-west Cheltenham, Winchcombe, Highnam, Tewkesbury/Ashchurch and elsewhere as available and deliverable to help meet housing needs. Some wider strategic comments also call for stronger climate, ecology and heritage assessment in the HELAA process and better use of brownfield land before Green Belt release.

731 responses in total

Urban Capacity Studies

Responses split between two broad themes: objections to further greenfield release and support for it where urban capacity is seen as insufficient.

A recurring concern is that the study appears to move away from a 'brownfield first' approach and towards greenfield development, with respondents worried about loss of countryside, farmland, habitats and biodiversity. Related points ask for stronger integration of nature recovery, Biodiversity Net Gain and green space planning, including whether environmental groups were invited to nominate land for SANG/BNG and similar uses.

Another clear theme is that the study should make better use of urban land through higher densities. One respondent argues the approach is too two-dimensional and should focus more on 4–6 storey development, smaller and more affordable homes, and forms of development that reduce pressure on land take and flood-prone areas.

Several comments question omissions or methodology. These include concerns that the borough-level studies were not publicly consulted on, queries over how Green Belt purposes are being addressed, and criticism that the airport has been omitted despite being seen as a major potential development opportunity.

In contrast, a detailed developer response strongly supports the study's conclusion that urban land alone cannot meet housing need, especially in Tewkesbury Borough, and uses this to argue for strategic greenfield allocations. It promotes land north of Stoke Road, Bishops Cleeve, for a large mixed-use scheme including housing, open space, education, employment and ecological improvements.

A smaller number of comments focus on design and heritage, calling for traditional architecture, reuse of older buildings, and restrictions on demolition.

10 responses received.

Consultation responses mainly focussed on concerns relating to Apperley, with a strong and consistent view that it should not be classified as a Service Village. Respondents argued that the designation does not reflect local circumstances, citing the village's limited facilities, poor accessibility and infrastructure constraints.

A recurring theme was the lack of essential services within Apperley. Respondents highlighted the absence of facilities such as shops, healthcare provision, pharmacies and other day-to-day services, meaning residents are heavily reliant on travelling elsewhere to meet basic needs.

Transport and accessibility concerns featured prominently. Many respondents described bus services as infrequent and poorly timed, while roads were characterised as narrow, congested and often unsuitable for increased traffic. A lack of pavements, safe walking routes and cycling infrastructure was repeatedly identified, reinforcing concerns about car dependency.

Infrastructure capacity was another major issue. Respondents raised concerns regarding low water pressure, electricity supply constraints, drainage and sewerage capacity, broadband limitations and occasional power outages. Many considered existing infrastructure insufficient to accommodate significant additional growth.

Flood risk emerged as one of the strongest themes throughout the consultation. Respondents argued that parts of Apperley and several proposed development sites are affected by fluvial and surface water flooding. Concerns were raised about roads becoming impassable during flood events, the risk of settlements being isolated, and the potential for new development to worsen drainage and runoff issues.

Education provision was also cited as a constraint, with many respondents stating that the local primary school is already at or near capacity. More broadly, concerns were raised about pressure on health services and other community facilities should further housing be accommodated without supporting investment.

Many responses specifically objected to the proposed HELAA sites around Apperley. Concerns focused on flood risk, poor access arrangements, increased traffic, loss of

agricultural land and green space, and potential harm to the village's rural character and identity.

Across a large number of responses there was support for only limited, infrastructure-led growth. Respondents generally accepted that small-scale development meeting local needs may be appropriate, but argued that significant growth should not occur unless roads, utilities, drainage, schools and other services are improved first.

Comments relating to Churchdown focused on both settlement classification and development pressures. A number of respondents argued that Churchdown has been incorrectly classified as an urban fringe settlement, suggesting instead that it should continue to be recognised as a distinct village, or alongside Innsworth as a small town.

There were also repeated concerns about the capacity of Churchdown to accommodate further development. Respondents cited existing pressures on roads, schools, healthcare services, water and sewerage infrastructure, arguing that previous growth has already stretched local facilities.

The protection of Green Belt land was a significant issue, particularly around Churchdown and Parton Farm. Respondents emphasised the importance of maintaining the separation between settlements, preventing coalescence with Gloucester, and retaining open countryside, biodiversity and landscape character.

More broadly, many respondents objected to development on greenfield and Green Belt land, raising concerns about the loss of wildlife habitats, biodiversity impacts, climate change resilience and the gradual erosion of village identity and character.

A further theme related to the quality and accuracy of the evidence base. Numerous respondents questioned whether settlement classifications were supported by robust evidence, with particular concerns that population figures and service data for Churchdown and Innsworth may be inaccurate. Some suggested these errors undermine confidence in the methodology and overall findings.

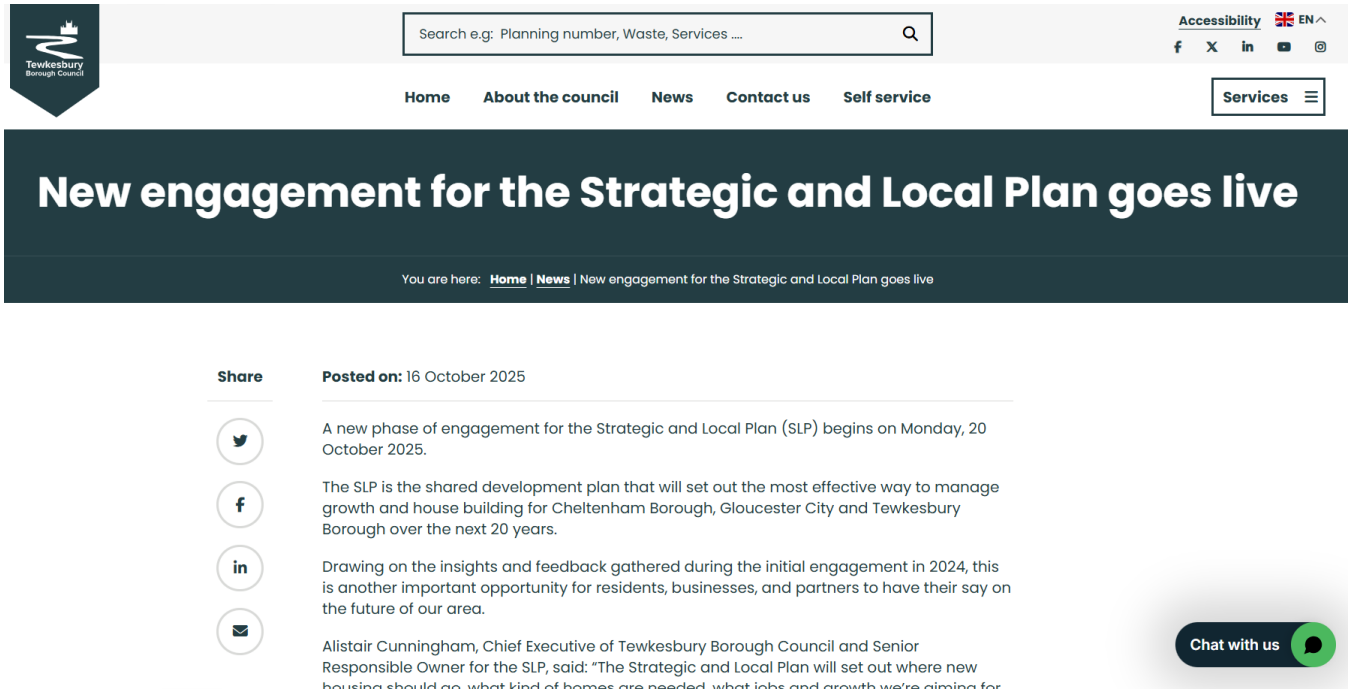
Several responses also called for improvements to the settlement hierarchy methodology itself. While some respondents supported the principle of reviewing and refining the hierarchy, others felt it had become overly complex, lacked transparency in places and needed stronger justification, particularly regarding accessibility assumptions and distinctions between settlement tiers.

Overall, respondents commonly argued that future growth should be directed towards the most sustainable locations and be accompanied by timely infrastructure investment. There was broad support for a planning approach that balances development needs with infrastructure capacity, environmental protection, settlement character and community wellbeing.

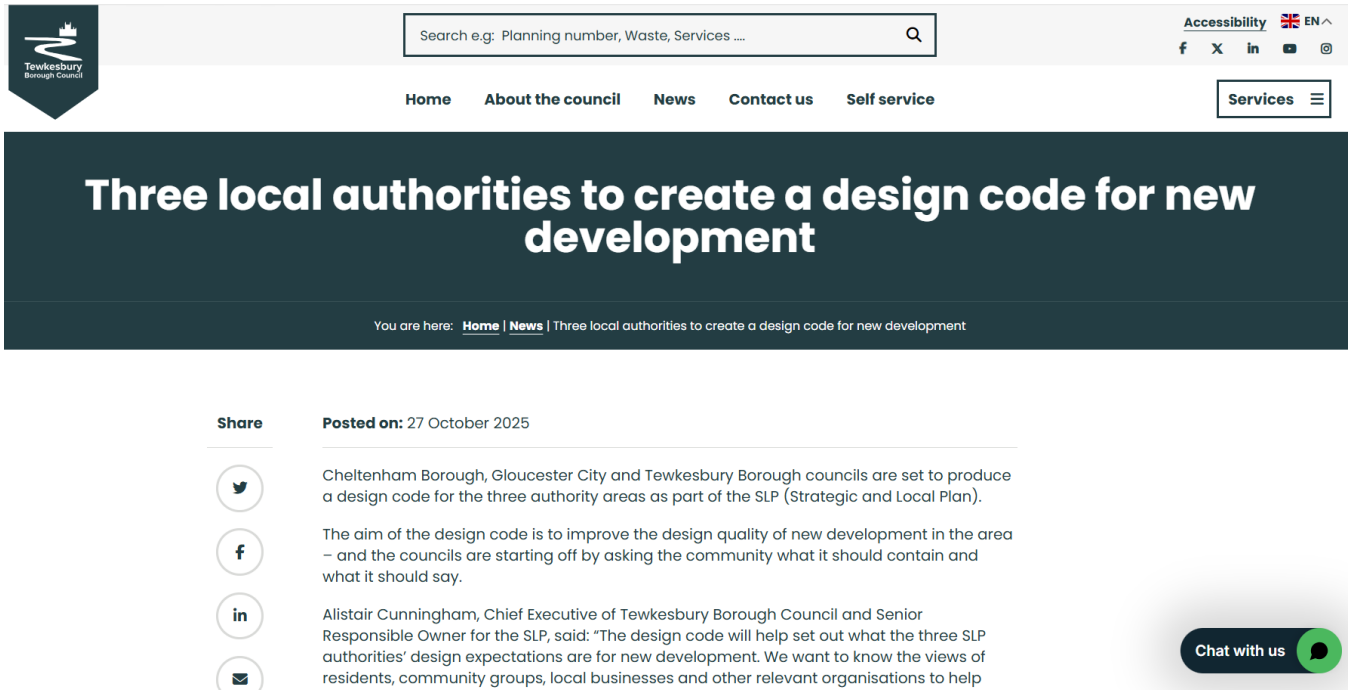
115 responses received.

Communications and awareness raising

Press releases

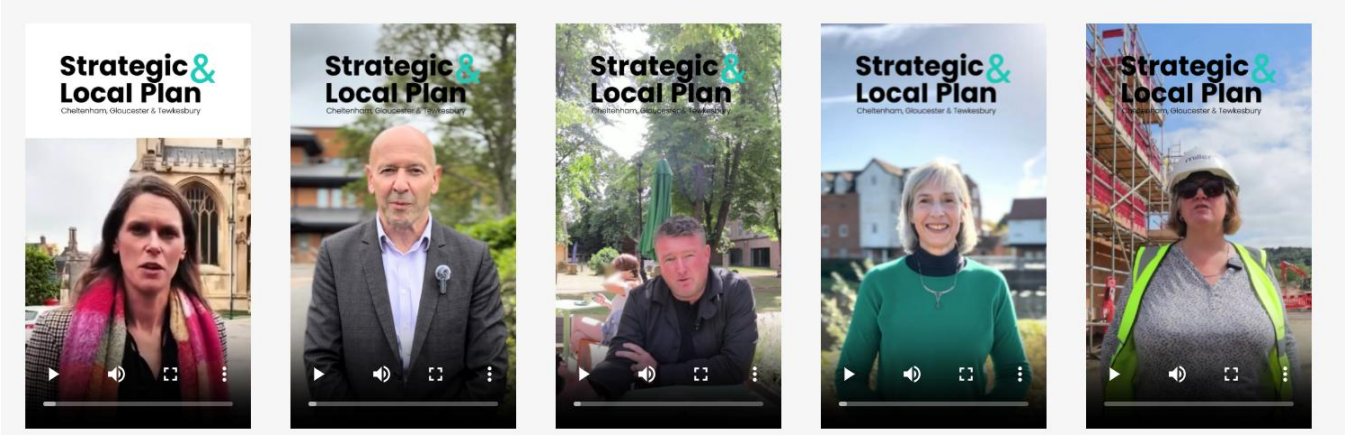


New engagement for the Strategic and Local Plan goes live - Tewkesbury Borough Council



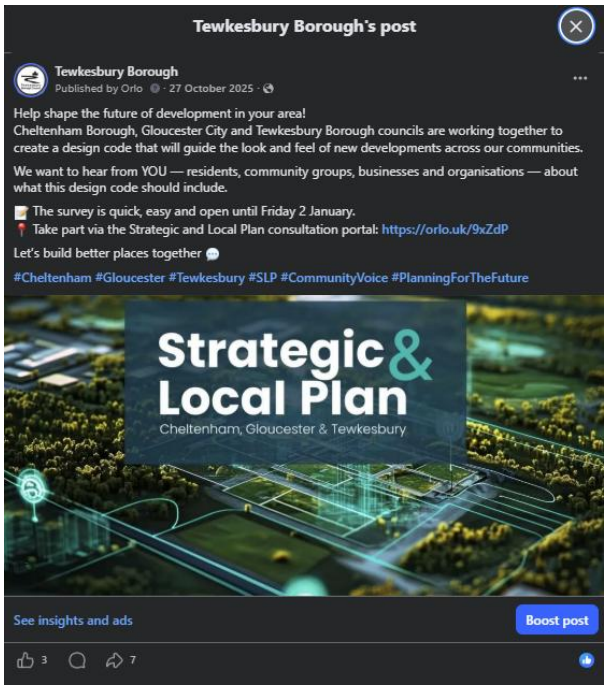
[Three local authorities to create a design code for new development - Tewkesbury Borough Council]

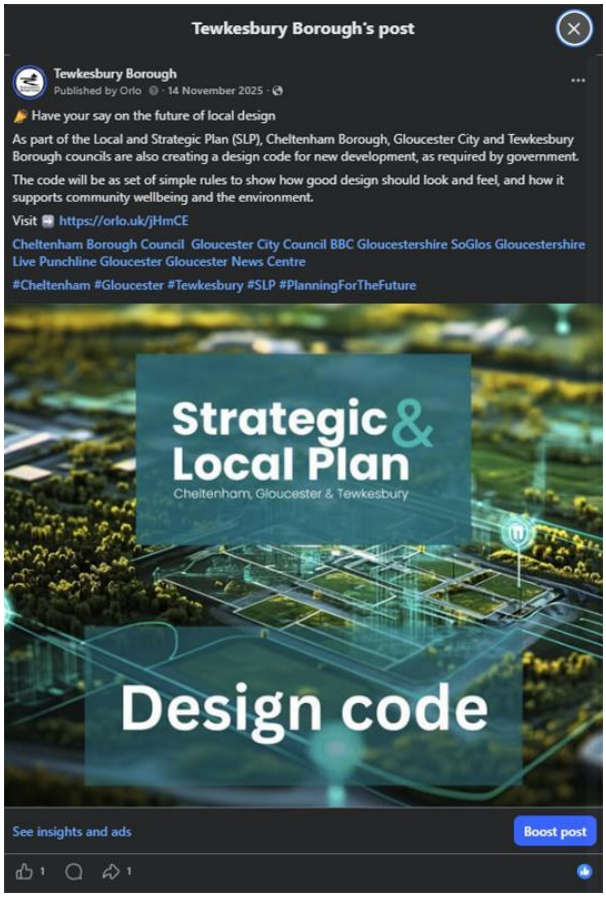
Engagement videos

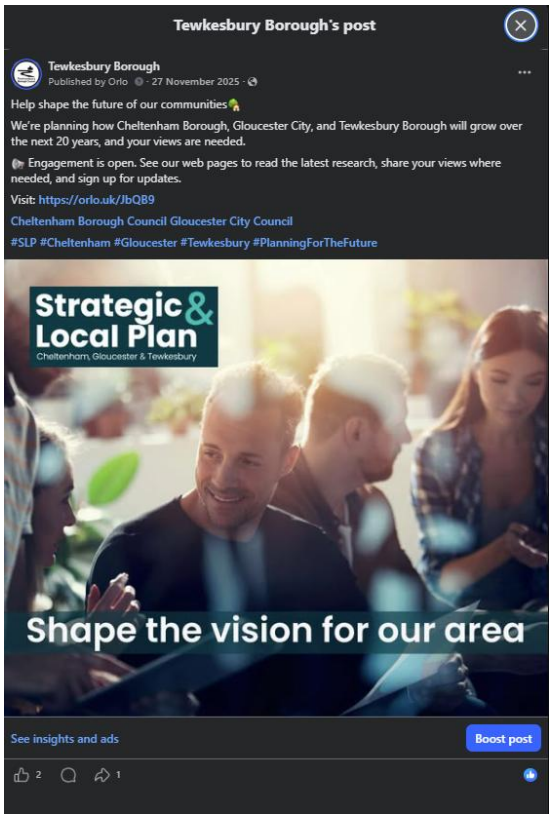


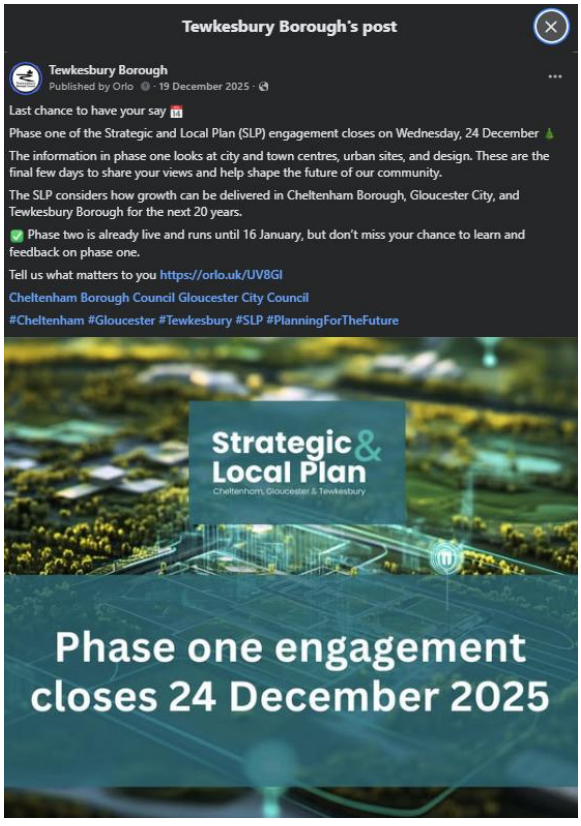
[strategiclocalplan.org]

Social media posts






Tewkesbury Borough's post
Tewkesbury Borough
Published by Orlo · 27 November 2025 ·
Help shape the future of our communities
We're planning how Cheltenham Borough, Gloucester City, and Tewkesbury Borough will grow over the next 20 years, and your views are needed.
Engagement is open. See our web pages to read the latest research, share your views where needed, and sign up for updates.
Visit: https://orlo.uk/JbQB9
Cheltenham Borough Council Gloucester City Council
#SLP #Cheltenham #Gloucester #Tewkesbury #PlanningForTheFuture
Strategic & Local Plan
Cheltenham, Gloucester & Tewkesbury
Shape the vision for our area
See insights and ads
Boost post
2
1


Tewkesbury Borough's post
Tewkesbury Borough
Published by Orlo · 19 December 2025 ·
Last chance to have your say
Phase one of the Strategic and Local Plan (SLP) engagement closes on Wednesday, 24 December
The information in phase one looks at city and town centres, urban sites, and design. These are the final few days to share your views and help shape the future of our community.
The SLP considers how growth can be delivered in Cheltenham Borough, Gloucester City, and Tewkesbury Borough for the next 20 years.
Phase two is already live and runs until 16 January, but don't miss your chance to learn and feedback on phase one.
Tell us what matters to you https://orlo.uk/UV8GI
Cheltenham Borough Council Gloucester City Council
#Cheltenham #Gloucester #Tewkesbury #SLP #PlanningForTheFuture
Strategic & Local Plan
Cheltenham, Gloucester & Tewkesbury
Phase one engagement closes 24 December 2025


Tewkesbury Borough's post
Tewkesbury Borough
Published by Orlo · 12 December 2025 ·
Have your say on the future of your area
The Strategic and Local Plan (#SLP) will shape how Cheltenham Borough, Gloucester City and Tewkesbury Borough will grow over the next 20 years - and we need your views.
Read new information has just been released about:
Housing and jobs growth
Potential future development sites
Suggested locations for communities
Engagement closes 16 January 2026.
Share your feedback and sign up for updates here: https://orlo.uk/llb8j
Your voice matters.
Cheltenham Borough Council Gloucester City Council
#SLP #Cheltenham #Gloucester #Tewkesbury #PlanningForTheFuture
Strategic & Local Plan
Cheltenham, Gloucester & Tewkesbury
Give your views
See insights and ads
Boost post

Letters / emails

Dear Thomas Redfern

New topic papers and evidence studies have now been published to the Strategic and Local Plan (SLP) engagement platform. These will help shape how Cheltenham Borough, Gloucester City, and Tewkesbury Borough will grow over the next 20 years, and everyone's views are needed.

Residents and businesses in these areas can review evidence and and share feedback to help guide the SLP.

The latest publications include:

- The Vision and Objectives Topic Paper
- A Settlement Hierarchy Topic Paper
- A Spatial Options Topic Paper
- The Housing and Economic Land Availability Assessment (HELAA) methodology & map

The engagement will be open until 16th January 2026.

You can explore topic papers and evidence studies, and sign up for notifications about new papers as they are released on the Strategic and Local Plan Engagement Platform.

Kind regards,

The Strategic and Local Plan Team

Dear Charlotte Handcock

A new phase of engagement for the Strategic and Local Plan (SLP) begins on Monday, 20 October 2025 and will run until June 2026.

Drawing on the insights and feedback gathered during the initial engagement in 2024, this is another important opportunity for residents, businesses, and partners to have their say on the future of our area.

We will be engaging on a number of topic and evidence papers. Each paper will be open to participation for a six-week period.

In addition to the topic and evidence papers, the 2024 Regulation 18 Consultation Report has been published and is available to view here: Project: Regulation 18 Spatial Options and Key Policy Areas Consultation Report

You can explore topic papers and evidence studies, and sign up for notifications about the new papers as they are released, at strategiclocalplan.org.

Kind regards,

The Strategic and Local Plan Team

Publications



Winter 2025 Issue

Residents, businesses, and community groups across Cheltenham Borough, Gloucester City and Tewkesbury Borough can see and comment on new research, in a second phase of engagement with the Strategic and Local Plan (SLP).

The latest phase of engagement, launched in October, offers everyone the chance to learn and help shape how their communities grow and evolve over the next 20 years.

This new engagement builds on the feedback gathered during 2024, which saw over 1,000 people take part. That input has helped inform the next stage of the plan, and now the councils are asking for views once again.

What is the SLP?

The Strategic and Local Plan is a shared development plan which is being created by Cheltenham Borough, Gloucester City and Tewkesbury Borough councils.

It will guide decisions on:

- Planning new homes - deciding where homes should go and what types are needed
- Boosting jobs and growth - creating the right conditions for local businesses to thrive
- Revitalising town centres - making them vibrant, welcoming hubs for our communities
- Improving infrastructure - from roads and cycle paths to flood protection and green spaces
- Putting nature first - making climate action and biodiversity central to our plans.

"The SLP will shape how our area grows, and it's essential that it reflects the needs and priorities of our communities, whilst protecting the natural and historic environment. That's why we're encouraging everyone to get involved and share their views."

Alistair Cunningham, Chief Executive of Tewkesbury Borough Council and Senior Responsible Owner for the SLP

What's happening now?

Visit the dedicated SLP website to read a series of research papers, some of which are designed to raise awareness, while others invite direct feedback. Each paper is open for comment for six weeks, giving people plenty of time to read, reflect, and respond.

Workshops are also being held with targeted groups, to gather feedback from those involved in housing and economic development.

How to get involved

The engagement will run until June 2026, with the draft plan due for pre-submission to government in July 2026, and final submission expected in October/November 2026. Once submitted, the plan will be publicly examined, offering another opportunity for people to have their say.

Visit **strategiclocalplan.org** to explore the latest papers, find out results from the last phase of engagement and sign up for notifications.

SLP Design Code - give your views

As part of the SLP, the three councils are also creating a design code for new development, as required by government.

The code will be a set of simple rules to show how good design should look and feel, and how it supports community wellbeing and the environment.

Share your feedback by 2 January 2026.

Visit: **strategiclocalplan.org**



Work on the Strategic and Local Plan (SLP) is continuing, with feedback from recent engagement residents, businesses, and partners, currently being reviewed to shape the next stage.

The SLP sets out the best options for housing and employment growth across Cheltenham Borough, Gloucester City, and Tewkesbury Borough, over the next 20 years.

Councillor Sarah Hands, Lead Member for Planning and Place Making, said:

> ***"The SLP will help create places that work for people, the environment, and the local economy.***
>
> ***With new housing proposals coming forward, it's essential to ensure that development happens in the right locations, and is supported by infrastructure such as roads, schools, and healthcare.***

A further six-week engagement is planned for later in 2026, ahead of the government's end-of-year deadline.

Find out more and sign up for updates at: **strategiclocalplan.org**

Appendix 6 – Design Code workshop summary

Engagement on the SLP Design Code for Tewkesbury, Gloucester and Cheltenham

Funded by MHCLG through the Design Code Pathfinders programme, the SLP Design Code provides borough- and district-wide design guidance across the SLP area.

The **consultant team** chosen included: David Hawes Urban Design (lead consultant), the Nash Partnership and Landsmith Associates.

A **working group** established by the Place Development Manager for Tewkesbury Garden Communities met monthly from July 2025 to July 2026. It included representatives from the Garden Communities team, GCC strategic highways, SLP urban design, policy and infrastructure teams, and development management.

Engagement throughout the Code's development helped align it with the SLP's vision and objectives. It included a public questionnaire, joint member briefings, a developer and agent briefing, and two officer workshops involving officers from the three authorities and relevant GCC and specialist teams. Follow-up meetings and written feedback addressed green infrastructure, climate change and highways development management across the SLP area.

Engagement

A summary of the Design Code's engagement over the last year is set out below:

1. **Public engagement questionnaire (Dec 2025)**
   An early public engagement exercise was undertaken in December 2025 to inform the SLP Design Code and understand local priorities for new development. It sought views on attractive places, local character, green spaces, connected neighbourhoods, housing quality, community facilities and long-term stewardship. Respondents emphasised distinctive, well-connected places that reflect local character, incorporate high-quality green infrastructure and provide attractive environments in which to live, work and spend time.
   The Design Code responds directly to these themes through guidance on local character, landscape-led design, green infrastructure and biodiversity, connected neighbourhoods, high-quality streets and housing, community facilities, durable

materials and long-term stewardship. Together, these measures support attractive, sustainable and healthy places that reflect community priorities and the objectives of the Strategic and Local Plan.

2. **Joint Planning Policy Reference Panel - Members engagement - (5 Feb 2026)**
   Members were engaged from an early stage in the Design Code's development. This initial briefing introduced the emerging structure and explored how the Code could align with the SLP's policies, objectives and principles. Discussion on the different forms and scales of planned growth, including character and identity in smaller rural settlements, helped shape the Code's proportional approach, scope and level of ambition.

3. **Officers 1st Engagement Workshop (26 Feb 2026)**
   The in-person workshop explored the Design Code's emerging structure, objectives and principles. Officers tested key design, planning, landscape and highways considerations across three contrasting areas to inform the Code's development.

   The exercise identified requirements for developments of different scales and their effects on local character and identity. Discussion also covered play, landscape-led design, highways interventions, and alignment between the emerging SLP policies and the Design Code.

4. **Developers & Agents engagement (5 May 2026)**
   A developer engagement session was held on 5 May 2026 to introduce the emerging SLP Design Code, explain its relationship with the Strategic and Local Plan, and seek early feedback on its proposed approach. The session outlined how the Code would provide a consistent, district-wide framework for securing high-quality, locally distinctive development across Cheltenham, Gloucester and Tewkesbury, while supporting climate, biodiversity and placemaking objectives. Discussion focused on alignment with Gloucestershire County Council highways guidance, the Code's role as a development management and applicant guidance tool rather than a site-selection mechanism, its relationship with employment development, and the coordination of density, housing, parking and street typologies. Participants also raised questions about the Code's adoption route and programme alongside the SLP. Feedback from the session was used to inform the Code's continued development ahead of further engagement with officers, members and developers.

Questions focused on alignment with highways guidance, the Code's role in development management rather than site selection, its application to employment sites, and the coordination of density, housing, parking and street typologies. Participants also sought clarification on the Code's adoption route and timing alongside the SLP.

5. **Officers 2nd Engagement (20 July 2026)**

   The meeting reviewed the emerging Strategic Local Plan Design Code and gathered feedback from officers across the three authorities on delivering high-quality placemaking. Discussion focused on aligning planning policy and design expectations through clearer requirements, including for density, viability, climate resilience, movement, green infrastructure, housing quality and community facilities.
   Officers considered how the Design Code should apply across different site types. Priorities included clear, enforceable requirements; better private and communal spaces; increased tree canopy; stronger connectivity; and practical responses to climate, viability, bin storage and implementation. The code should be clear and actionable, supporting high-quality, sustainable development.

6. **Members 2nd briefing (13 October 2026)**

   The near-complete Design Code was presented to members, outlining how it had evolved, its alignment with emerging SLP policies, and its role in guiding different scales and types of urban growth – and how it structures strategic design considerations with regard to character and design. Members were also guided through the document's structure, the purpose of each chapter and how the Code is intended to be applied proportionately.

Appendix 7 – Disability forum meeting notes

Cheltenham Accessibility Forum – Strategic and Local Plan policies meeting Thursday 20 August 2pm – Teams

NOTES

Present:

Guests:

Apologies:

Transport related policies

Ryan Bunce gave an overview of the 5 transport related policies in the Strategic and Local Plan – please see slides.

- The Strategic and Local Plan (SLP) takes into account the 3 existing plans of the 3 authorities (Cheltenham, Gloucester and Tewkesbury) and the Joint Core Strategy and testing and transport modelling has been done to feed in to the policies.
- The first policy is a broad approach to transport, to ensure it is in the right place and laid out in way which delivers the plan objectives and minimises the need for car use and promotes walking, wheeling, cycling and public transport.
- The hierarchy of transport modes places people at the top as the first priority, then vehicles such as cyclists, and finally private vehicles. Needs are considered and prioritised in that order.
- 'Wheeling' includes wheelchairs, mobility scooters, prams, pushchairs and similar mobility aids.
    - **QUESTION** - Does 'wheeling' include people with guide dogs which need more space – does this count as a mobility aid? Ryan agreed to add in detailed wording about assistance animals.
    - **COMMENT** - Guide dogs are trained to stop at kerbs and they're trained that they're a certain height so it can be hard when this changes for people with sight loss. Shared spaces are also difficult.

- The aim is for healthy, safe and inclusive design – for everyone, supporting the economy, long lasting and enhancing the built or natural environment.
    - **QUESTION** – Will there be examples shown? Ryan explained that the policy is about the high level expectations from developments, not the specifics on design. GCC is working on a manual for Gloucestershire streets which will give more examples of how all of these needs can be met. Ryan will recommend that the Accessibility Forum is consulted during the development of the manual.
    - **QUESTION** – what is meant by 'streets?' 'Thoroughfair' might be a more all embracing term rather than evoking cars only. 'Streets' is the term used in national guidance and is a more inclusive terms than 'highway'.
- In the walking, cycling and wheeling detail, developments should have amenities within 800 metres, via routes which are safe and direct, accessible and inclusive.
    - **COMMENT** – 800m is a long walk to accessible transport if you have mobility issues, what's the rationale for it being 800m? Ryan explained that this is one of the standard walking distances used to major transport hubs and secondary schools. 400m is unrealistic for some of the larger infrastructure but some things would be expected to be within a closer distance, such as play spaces and distance also depends on incline as well.
    - **QUESTION** – do councils have the power to make sure buses are provided and not just bus stops once a development is in place? Ryan confirmed that councils can include a planning requirement for services to be provided for a period from completion. This is usually a financial contribution to running a service which isn't financially viable for a period of time, usually 4 years to get the service to the point of sustaining.
- In the kerbside space and parking detail, higher priority users are considered first and parking should be provided efficiently to maximise unallocated parking and different parking types including for bikes and e-bikes.
    - **QUESTION** – is there a standard requirement of a number of parking spaces per house? Ryan explained that the current number won't be reduced but how they're provided may change so that there isn't overspill.
    - **QUESTION** – will pavement parking be banned? GCC currently has the power to ban it but in some areas people need it for access, or some road widths mean it is the only option. This policy focusses on ensuring that design

doesn't encourage or allow pavement parking, but using the kerbside for other things suh as pocket parks, rain gardens etc. There is a need to ensure kerbside provision doesn't cause problems such as tree roots.

Housing policy

Ewan Wright gave an overview of the draft housing policy headlines.

- Through national government policy (working through the SLP) councils have the option to require developers to provide a certain level of housing which is accessible to wheelchairs or has level access for people with mobility issues. The need has to be justified and the evidence is now in place.
- Currently there are 4 separate plans in operation – the plans for each of the 3 councils, plus the Joint Core Strategy (JCS). Gloucester City's plan requires 25% of development to be level access and 4% wheelchair accessible. Tewkesbury, Cheltenham and the JCS don't have a set percentage. The SLP gives an opportunity to deliver a higher level of level access and wheelchair accessible homes for people who need them and future proof new housing stock so people can stay in communities as long as they need and want to.
- The proposal is (subject to viability testing) that 100% of housing be built to N42 level access standard and that 10% of new affordable housing is wheelchair accessible and 5% open market wheelchair accessible as well. This hasn't gone through consultation with developers and planning consultants yet.
- For context, in Cheltenham since the start of the last plan in late 2017, 49 level access homes out of 850 affordable homes have been delivered, and 3 wheelchair accessible homes. This shows what happens without a clear policy with evidence of need, although there are 240 level access affordable homes in the pipeline. The government has very recently released a new planning policy framework plan which talks about 40% as the minimum number of level access homes.
    - **QUESTION –** if someone with disabilities moves into a home which isn't level access and adapted for mobility needs, this has to be covered by disabled facilities grants? Ewan confirmed this and that it is easier if it is built in from the start, paid by developers. We have an ageing population.

- **QUESTION –** what does level access mean? This is N42 level access, which may be suitable for a wheelchair user to visit, but not to live in without adaptation.
- **QUESTION –** why can't these standards be provided as standard? The blockers are money and the requirement to do it, which has to be justified.
- **QUESTIONS** – does a ramp count as being level access? Ewan explained that this would enable level access in to the property but N42 is a range of requirements such as wider doorways which could be adapted. The ramp would need to be a certain gradient and material.
- **QUESTION –** could the group see the detail of part M?
- **COMMENT –** wheelchair users often need to access the toilet from a specific side depending on their mobility issues, what are the national standards? Ewan explained that the plan provides the principles for building homes and the technical requirements follow.

Action – the group was asked to send any further comments of questions for Ryan or Ewan to Helen Down.

Appendix 8 – Gloucestershire affordable Housing Partnership Workshop Outcomes – February 2026

Table Number	Question?	Theme(s)	Exact Feedback	SLP Response	How has policy been changed?
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	100% NDSS	100% NDSS	The SLP will include a NDSS policy.	NDSS policy added
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Double Occupancy	Double Occupancy	The provision of homes to double occupancy levels will be agreed by negotiation.	No change
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Clustering	Cluster tenure types together- maintenance	Clustering arrangements have been included within the affordable housing policy, although the plan cannot account for all scenarios.	Clarification added regarding clustering arrangements- clusters of between 6-12 affordable dwellings deemed acceptable
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	M4(2)/M4(3)	M4(2)/M4(3)- M4(2) not far off NDSS	The plan includes a policy setting out specific requirements for M4(2) and M4(3) dwellings.	Specific requirements set out for M4(2) and M4(3) provision across all tenures.
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Energy Efficiency	EPC A	Climate Change and Energy Efficiency is a golden thread of the SLP, and the plan will explore securing higher energy efficiency standards on new development.	This is addressed throughout the SLP.

1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Design and Service Charges	Design in low service charges, minimise communal areas- RPs	The SLP includes a range of design policies and design codes, although makes no mention of service charges.	No change- these matters will be agreed by negotiation.
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Usable outside space	Useful outside space	The SLP design policies cover this aspect, and will apply to both affordable and market homes.	This is addressed within SLP design policies.
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	Good parking and public transport	Parking/public transport	Spatial and transport policies are covered within the SLP, with a focus on promoting sustainable modes of travel. These are handled within separate policies	This is addressed throughout the SLP.
1	What does good look like? Strategic and non-strategic sites - AH design, clustering, AH standards, NDSS, Accessible/adaptable homes	BNG	BNG- focus area not spread out, can be a community asset.	The SLP will include policies covering Biodiversity Net Gain.	This is addressed throughout the SLP.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Viability	Clear process to speed up planning, commuted sums should be used as a last resort, alterative sites could be identified for affordable housing.	The SLP affordable housing policy includes a process for determining viability	SLP Affordable Housing policy makes clear that commuted sums will be sought as a last resort.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Additionality	Variable percentages of additionality should be considered.	The SLP includes a policy which provides greater clarity in terms of the response to how additionality will be dealt with.	Further clarity added around SLP approach to additionality.

2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Use of Commuted Sums	Knowing that these are available, passing to RP's for use.	The Infrastructure Funding Statement outlines Commuted Sums received by Local Authorities.	This falls outside the SLP's scope.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Nominations & Local Lettings Plans	Timing of local lettings plans is important- having prescribed timeframes equally so.	Local Letting Plans fall outside the SLP policy.	This falls outside the SLP's scope.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Clearing Service	A need to advertise sites properly on the Homes England Clearing Service in a transparent manner	This matter falls outside of the scope of the SLP.	This falls outside the SLP's scope.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Housing Mix and Tenure	Needs discussions with RP's regarding appetite and mix	National policy and the SLP both encourage early pre-application engagement on new developments	SLP affordable housing policy emphasises the importance of early pre-application engagement between the applicant and SLP authorities.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Adquate unit sizes	Units Sizes	The SLP includes a policy on NDSS.	NDSS policy added
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Urban Design Principles	Urban Design	The SLP includes a range of design policies and design codes which will help contribute to an overall uplift in the design and functionality of new developments.	This is addressed throughout the SLP.
2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Environmental Standards	Environmental Standards	Climate Change and Energy Efficiency is a golden thread of the SLP, and the plan will explore securing higher energy efficiency standards on new development.	This is addressed throughout the SLP.

2	Viability, Commuted Sums, Additionality, Nominations and Vacant Building Credit	Brownfield Remediaton Costs	Costs associated with remediating brownfield sites- contamination/demolition etc	This would be addressed seperately by Homes England (for grant funding) or through national policy (in terms of Vacant Building Credit). The SLP authorities have conducted a robust assessment of land availability within urban centres to inform the SLP.	This matter is addressed by national policy and approach to allocating grant funding (via Homes England).
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?		The SLP affordable housing policy includes further guidance and clarification around how additionality can reflect housing need.	Further clarity added around SLP approach to additionality.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Para 9a)clarification	Para 9a)needs some clarification (i.e. definition needed)	Policies have been rewritten, and, where appropriate, definitions provided to aid in understanding of policy requirements.	The affordable housing policy has been rewritten to provide greater clarity around the expectations that SLP authorities have in terms of the provision of affordable housing.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Suitability vs need	Prioritise 'suitability over 'need' - suitability of site area not just house type	The SLP authorities have conducted a robust assessment of land availability, which considers site characteristics and opportunities when determining site allocations.	The SLP has included a robust assessment of land availability and suitability.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Flexibility for HA's	More clarity for flexibility for HA's compared to 'greedy developers'	The SLP has sought to provide more clarity around expectations for delivering affordable housing to all parties involved in the development	The SLP affordable housing policy has sought to try and provide greater clarification around the

				process.	delivery of affordable housing.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	SR/Sect 106	Keep to SR in Sect 106 and additionality	The proposed affordable housing mix reflects the Housing and Economic Needs Assessment (HENA), which sets out that the majority of new affordable homes should be delivered at social rented levels.	The SLP includes a requirement that the majority of affordable housing delivery be provided at social rented levels.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	100% AH - Bedroom Mix	Flexibility on bedroom mix on 100% affordable housing schemes	The SLP includes flexibility in terms of land-led development to agree different mixes in writing with the SLP authority.	The SLP affordable housing policy offers flexiblity to agree alternative mixes in writing.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Housing thresholds	Review housing thresholds to enable schemes upto 9 dwellings to provide a minimum number of uits or financial contribution for each unit e.g. Wychavon DC policy	The affordable rural exception site policy includes affordable housing requirements on sites of less than 10 units. Commuted sums (subject to context of development) will be sought in exceptional circumstances where this complies with NPPF requirements.	
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Calculations - unit contributions	Consider financial contribution to include 'half units' to avoid rounding up affordable housing calculations and avoid losing out on contributions	This may be agreed through the Section 106 on affordable housing developments - e.g. the norms of rounding apply	This falls outside the SLP's scope.

3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Pre discussion with RP	Bring RP into conversations before planning app or before additionality agreed by developer. Need policy position/review/check specific housing need for area e.g. up-to-date information similar to rural housing needs survey prioir to developet discussions	The Housing and Economic Needs Assessment sets out the suggested affordable housing mix based on identified housing needs, and this can be changed by agreement in writing with the local authority	The SLP has drawn upon the Housing and Economic Needs Assessment to inform our housing need. The SLP explicitly encourages early engagement between RPs, Developers and LPAs.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	Happy compliant	Happy compliant add to specialist affordable housing	The SLP has not included HAPPI standards within the SLP's specialist accommodation policy, although several of the key principles found within the HAPPI standards are captured within the policy.	A number of the key principles found within the HAPPI providers have been included within the SLP.
3	AH thresholds, 100% land led schemes and additionality, how does additionality meet needs?	M4(2)	All bungalows to be M4(2) compliant	The SLP sets out a high percentage requirement for M4(2) dwellings across all tenures and types of housing.	The SLP sets out specific percentages around the delivery of M4(2) units on new developments.
4	AH housing mix and tenure (bedroom sizes and tenure)	1. Specify Mixes	1. Should be specifying mixes - more focused on OM sale	The housing mix policy includes suggested mixes for affordable and market homes, based on identified need arising from the Housing and Economic Needs Assessment.	Overall mixes covering both open market and affordable homes included within the housing mix policy.

4	AH housing mix and tenure (bedroom sizes and tenure)	Balanced sizes	Need to secure a balanced range of sizes (especially important in rural areas)	The housing mix policy includes suggested mixes for affordable and market homes, based on identified need arising from the Housing and Economic Needs Assessment.	Overall mixes covering both open market and affordable homes included within the housing mix policy.
4	AH housing mix and tenure (bedroom sizes and tenure)	Social Rent Focus	Should focus on delivering SR from affordability perspective	The SLP's affordable housing policy includes a significant focus on delivering social rented homes.	SLP clearly specifies preference for Social Rented delivery.
4	AH housing mix and tenure (bedroom sizes and tenure)	Flexibility	Need for an element of flexibility	The Housing Mix and Affordable Housing policies allow for changes to the mix or tenure of affordable homes (subject to agreement in writing from the SLP authority).	The SLP allows applicants to agree alternative mixes in writing with the SLP authorities.
4	AH housing mix and tenure (bedroom sizes and tenure)	First Homes	FH does not do anything for RP's	The SLP includes a suggested affordable housing mix which details a proportion of homes to be delivered as affordable home ownership. In certain circumstances, e.g. for blocks of flats, the SLP authorities may determine that First Homes represent the most appropriate tenure to support mixed and balanced communities.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Service Charges	Take into consideration that BNG can increase SC's	This issue is captured elsewhere within the SLP.	No change

4	AH housing mix and tenure (bedroom sizes and tenure)	Sect 106	70:30 split in favour of SR - specify for Sect 106. Difficulty in capturing in additionality	The HENA has detailed the mix of affordable housing to be delivered, which includes a significant proportion of social rent.	The SLP sets out expected mixes for affordable housing in line with the Housing and Economic Need Assessment, including a majority of delivery for social rent.
4	AH housing mix and tenure (bedroom sizes and tenure)	Affordable Rent	Advise not to consider option of AR - difficult to explain to customers	The SLP has included a low level of affordable rent in line with the Housing and Economic Need Assessment identfied need, but this can be changed through securing agreement in writing from the SLP authority.	The SLP sets out expected mixes for affordable housing in line with the Housing and Economic Need Assessment, which includes a small level of affordable rent.
4	AH housing mix and tenure (bedroom sizes and tenure)	100% AH	can sometimes be used as nsk mitigation by developers	No further comments to add.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Rent to Buy	Could this have a role - see Merseyside examples. Can support customers to get into SO	Rent to Buy will be considered in line with the NPPF definition of affordable housing. The SLP's preference will be to deliver rented affordable homes.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Keep it Current	Need to respond to current need	The SLP includes the ability for affordable housing mixes to be changed through written agreement between the applicant and the SLP authority.	The SLP includes provisions to alter affordable housing mixes by agreement in writing with the SLP authorities
4	AH housing mix and tenure (bedroom sizes and tenure)	AR for EC	Not a good idea - consider SR as the preferred option	The SLP has not specified any requirements on affordability for extra care accommodation, although officers will push for social rents where viable.	No change

4	AH housing mix and tenure (bedroom sizes and tenure)	2. Add 100% AH	2. Adding 100% additionality not detrimental to RP's. Specifying housing need. 100% - land led opportunities	The SLP affordable housing policy outlines the SLP's approach towards land-led and 100% affordable housing sites.	The SLP addresses 100% affordable housing schemes and land-led developments.
4	AH housing mix and tenure (bedroom sizes and tenure)	Sect 106	Quite specific for percentages around 1,2,3,4,5 RP's saying 'this doesn't suit us' - might impact on RP bidding for new opportunities	Noted- the SLP includes clauses that allow alternative mixes to be agreed in writing with the SLP authorities.	The SLP includes provisions to alter affordable housing mixes by agreement in writing with the SLP authorities
4	AH housing mix and tenure (bedroom sizes and tenure)	Rural Exception Sites	Requirement for housing needs survey. Additionality, mix and sizes- if you start specifying becomes restrictive -avoid being overly restrictive	Noted- the SLP includes clauses that allow alternative mixes to be agreed in writing with the SLP authorities.	The SLP includes provisions to alter affordable housing mixes by agreement in writing with the SLP authorities
4	AH housing mix and tenure (bedroom sizes and tenure)	5 bed houses	Only 1% - 5 bed houses. Dependent on need e.g. 17 families on waiting list with a 5 bed need	The SLP seeks to provide a guideline for new affordable homes in terms of setting out the sizes of affordable housing required on-site.	The SLP includes expected tenure mixes which set out a significant percentage of delivery for 4 bedroom + homes (10-15%)
4	AH housing mix and tenure (bedroom sizes and tenure)	1 bed properties	1 bed - different property types. need to think about occupancy. NDSS is out of date. Not reflective of different house types	The NDSS is the only technical optional standard available to the SLP authorities to adopt, and, as such, the SLP's have sought to adopt this standard to support good living standards for residents across all tenures.	NDSS policy added

4	AH housing mix and tenure (bedroom sizes and tenure)	1 - 4 bed	1 - 4 bed for developers - open market. Specifying bedrooms rather than persons	The SLP housing mix policy includes guidelines around expected mixes for open market homes.	The SLP housing mix policy includes guidelines around expected mixes for open market homes.
4	AH housing mix and tenure (bedroom sizes and tenure)	2 bed flats	2 bed flats - not great for families. specifiy type depending - add or agree with RP/LA in partnership	This is a matter for negotiation, as the SLP cannot cover every scenario, and must remain a high-level plan.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	70:30 Split	Broadly ok for RP's - preference for SR - supported by Homes England /LA's. AR generates higher incomes, but not as affordable. How can we maximise numbers?	The SLP prioritises the delivery of Social Rented Homes and seeks to set broad proportions of social rented homes sought.	The SLP sets out expected mixes for affordable housing in line with the Housing and Economic Need Assessment, including a majority of delivery for social rent.
4	AH housing mix and tenure (bedroom sizes and tenure)	30% (SO not FH)	30% should be SO not FH. 1 bed and 2bed not for SO. Options to change tenure. Developers need to understand - likely lower offer for FH and SR vs SO and SR	The SLP sets out a proportion of affordable housing to be delivered, including affordable home ownership. Within this, the SLP will prioritise the delivery of Shared Ownership in terms of providing affordable home ownership.	The SLP sets out a percentage of affordable home ownership to be delivered on new development.
4	AH housing mix and tenure (bedroom sizes and tenure)	1 - 5 bed	Need to add persons	Occupancy levels will be determined by negotiation, although officers will seek to secure homes to futureproof occupancy levels.	No change

4	AH housing mix and tenure (bedroom sizes and tenure)	Accessibility Standard	M4(2) - reciommend 100% for M4(2)or M4(3). Land topgraphy can cause issues - ageing population - plan for this now. M4(3) for the future. Developers struggling to bguild M4(2)/M4(30 - houses and bungalows - approach - not massive viabilaity impact.	The SLP includes specific requirements for both M4(2) and M4(3) homes across all new developments. This will be subject to viability.	The SLP includes specific requirements for both M4(2) and M4(3) homes across all new developments. This will be subject to viability.
4	AH housing mix and tenure (bedroom sizes and tenure)	Additionality	Requires early conversation with LA/developer etc. Additionality up for negotiations	The SLP's affordable housing policy outlines how the LPA's will approach the issue of additionality. National Policy and the SLP encourages early discussions between developers and local authorities, as well as housing associations.	The SLP includes provisions around additionality and encourages early conversations between RPs, developers and local authorities.
4	AH housing mix and tenure (bedroom sizes and tenure)	3. First Homes	3. Minimum requirement of sites for RP's - FH has knock on impact. Better return for developer for SO than FH	The SLP sets out a proportion of affordable housing to be delivered, including affordable home ownership. Within this, the SLP will prioritise the delivery of Shared Ownership in terms of providing affordable home ownership.	The SLP sets out a percentage of affordable home ownership to be delivered on new development.

4	AH housing mix and tenure (bedroom sizes and tenure)	Policy re Flats	Need policy to reduce the number of flats. Quality is crucial. Are developer assumptions sound? Avoid due to high service charges. Increased risks and compliance issues - fire risks etc. Do not want mix tenure blocks of flats	This will be a matter for negotiation, but the SLP authorities recognise that flats can, if designed poorly, contribute to long-term community sustainability issues, however, a balance is required both from a design and density perspective to ensure that the plan delivers the required level of housing.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	No triple tenure	Potential for SR end up paying more than AR due to service charges. Different rental amounts. Proportions different for SR/AR - 3 tenures - AR apartments - SR family houses. Some developers use buffer of AR and SR/AR next to each other. LA's allocation policy - key workers	The SLP authorities will seek to address this matter through negotiations with developers and housing associations.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	1 - 5 bed	Would need to align with housing need; especially for SO. Cornwall has done this. Need sensible percentages - context and location dependent - developers talk to RP's upfront	The SLP seeks to encourage developers to engage with councils and housing associations at an early stage in the planning application process. The SLP provides broad percentages clarifying acceptable tenure mixes, which can be altered by agreement in writing with the SLP authorities.	The SLP has addressed housing need through the Housing and Economic Need Assessment, and these can be altered in agreement between the local authority and the applicant.

4	AH housing mix and tenure (bedroom sizes and tenure)	4 bed and 5 bed (SO)	4 bed and 5 bed not affordable for SO. Selling these homes maybe difficult. SO in one place to access. SO undeliverable for larger homes - need flexibility in plicy	Noted- the delivery of 4 and 5 bedroom shared ownership properties will be a matter for negotiation.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Timing - Developer	Developer sometimes approaches RP's too early or too late - encumber - trying to derisk	The SLP seeks to encourage developers to engage with councils and housing associations at an early stage in the planning application process.	The SLP encourages developers to engage early with RPs and local authorities to shape deliveries of affordable housing.
4	AH housing mix and tenure (bedroom sizes and tenure)	Key Workers	Shouldn't specify level of key workers. Key workers want to live and work - LA to identify need to allocate accordingly. Could be short term	The SLP doesn't include a specific policy on key workers. The Housing and Economic Needs Assessment doesn't identify a specific SLP wide need to provide specific accommodation for key workers.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	4. Type specification	4. If states 1 b - is this a flat, house, bungalow - what is occupancy level? All hinges on viability	The SLP doesn't prescribe the housetypes required on new developments- this will be subject to negotiation.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	HE Grant	HE grant may not cover 5 bed and 6 bed houses. May be compliant with NDSS but possibly big differences in build costs	This matter falls outside of the scope of the SLP.	No change

4	AH housing mix and tenure (bedroom sizes and tenure)	Standard House Types	Developers may have standard house types - this may limit opportunities to deliver different styles and property sizes (e.g. 5 bed or 6 bed)	The SLP makes clear that delivery of 4,5 and larger affordable properties is crucial, reflecting the lack of past delivery of lack of existing supply of these larger homes.	SLP provides a suggested affordable housing mix which sets out a significant level of delivery for 4b+ homes (10-15%)
4	AH housing mix and tenure (bedroom sizes and tenure)	Limited Sizes	May not provide families to naturally grow - if small 5 bed 6P - the LA may allocate tot he maximum occupation level. Not conducuve to supporting sustainable commu8nities - need to review - support opportunities for families to naturally grow. Also 4 bed 6P too small	The occupancy levels of affordable housing will be subject to negotiation between the SLP authorities and developers.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Sect 106 Valuations	Offers are lower - developers use opportunity to start discussing viability. Appraisals for RP's management costs, build costs etc - land values fixed. Regulations - other Sect 106 contributions. 70:30 - good for RP's. SO - first come first served. People can't afford 40%. Chalenges for buying larger homes and staying there	These matters broadly sit outside the SLP, however the SLP includes a clear viability process as well as setting out expected tenure mixes for affordable housing.	No change
4	AH housing mix and tenure (bedroom sizes and tenure)	Transparency and Consistency		The SLP will be taken out to Regulation 19 consultation in November 2026, where the public and key stakeholders will have the opportunity to comment on the Plan	No change

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Mix	Clarity on house/flat types, sizes and bedroom standards	Typology of new homes is not specified within the SLP, however, the SLP includes a policy setting out the requirement for new development to meet NDSS	The SLP includes a requirement for new homes to meet NDSS levels, and also includes suggested mixes for market and affordable homes.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Ambition whilst realistic	The SLP seeks to create a blueprint for providing high quality affordable housing provision through the SLP affordable housing policy.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Design	Promotes high quality living standards, space, design, community, meets the needs of all residents	The SLP will consider design matters holistically across a range of policies.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Consistency and Standard Clauses	This falls outside the scope of the SLP; although the SLP authorities will seek to standardise approaches in practice where possible.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Affordability	The SLP prioritises the delivery of Social Rented Homes and seeks to set broad proportions of social rented homes sought.	The SLP's identified need and stated expected affordable housing proposals sets out that the majority of affordable housing delivery should be social rent.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Is responsive to current data (not outdated stats)	The SLP draws upon the latest evidence from the Housing and economic need assessment, with flexibility to change mixes in writing with LA's.	The SLP includes flexibility to agree alternative mixes in writing with the SLP authorities.

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Adapts to changing needs over time (waiting list is not static)	The SLP draws upon the latest evidence from the Housing and economic need assessment, with flexibility to change mixes in writing with LA's. The Housing and Economic Need Assessment takes into account levels of need recorded on the Housing Register.	The SLP includes flexibility to agree alternative mixes in writing with the SLP authorities.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Sustainability	Policy promotes sustainable housing- EPC's should meet Future Homes Standards, sustainable transport	These matters are addressed in various policies across the SLP.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Right homes in the right places	The SLP has gone through a robust process to assess and distribute development appropriately across the SLP area to meet housing need.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	NDSS	Make sure bedrooms don't fall below 2.15m width for single or NDSS width equivalent for a double	This is a matter for planning enforcement teams, although the SLP will include a requirement for new homes to be delivered to NDSS.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Mix	Enable tenure switch to affordable by building in good space & sustainability standards	The sizes of market homes will be subject to NDSS standards. Sustainability standards will be also be outlined within the plan.	Market homes will be subject to the Nationally Described Space Standards (NDSS).

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Tenure	Affordable Rents	The SLP references the Housing and Economic Need Assessment (HENA), which sets out need for social rent, affordable rent and affordable home ownership dwellings.	SLP includes a break-down of expected affordable housing tenures.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Viability	Support viability for realistic schemes to be brought forwards without delays	The SLP has been viability tested to ensure that policy positions are deliverable.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Rural Exception Sites	Be clear about market homes role on rural exception sites	The SLP includes a separate policy on rural exception sites.	A separate rural exceptions sites policy has been included in the SLP.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	M4(2)/M4(3)	Embed M4(2)/M4(3) to all tenures and not just affordable	The SLP's policy on accessible and adaptable homes sets requirements for these homes across all tenures.	The SLP's policy on accessible and adaptable homes sets requirements for these homes across all tenures.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Guidance	Provide a clear helpful guide to support new opportunities which will be supported by LA's	The SLP authorities will explore publishing policy guidance following adoption of the SLP.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Clear evidence driven affording housing requirements	The affordable housing thresholds, tenures and mixes are set in accordance with the latest Housing and Economic Needs Assessment.	No change- affordable housing mixes reflect identified need arising from the Housing and Economic Need Assessment.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Older Persons	Consistency across the SLP area on Older Persons & Extra Care (C2/C3)	The SLP affordable housing policy sets a requirement for C2/C3 developments to include affordable housing.	A requirement has been added that C2/C3 provision will be subject to affordable housing requirements.

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Understand your places & Local Need	The SLP uses the Housing and Economic Needs Assessment to gauge local housing need.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Don't prioritise numbers and build the right homes to meet your need	The SLP has a set target to deliver approximately 43,000 homes, a significant proportion of which are affordable homes in line with standard method calculations. The SLP affordable housing policy provides details about how affordable housing need should be met.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Delivers truly affordable housing (consider rent levels, types and service charges)	The SLP sets out the different types of affordable housing to be delivered, providing clarity to developers and housing associations around the types of affordable housing expected, based on the Housing and Economic Needs Assessment.	A number of these issues fall outside the SLP, however the SLP includes a requirement around delivery of social rented homes.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Designed to meet local housing need through a range of tenure, mix and affordability.	The SLP uses the Housing and Economic Needs Assessment to gauge local housing need.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Meets the diverse needs of local communities.	The Housing and Economic Needs Assessment sets out the suggested affordable housing mix based on identified housing needs, which includes a wide range of different groups.	No change

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Viability	Be realistic as what is viable & deliverable & stick to it	The SLP has been viability tested to ensure that policy positions are deliverable.	The SLP is undergoing a robust viability assessment, to ensure that policy requirements are deliverable.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Double Occupancy, NDSS Standard, No clustering (6 or more)	The SLP includes a policy that requires new development to deliver homes to meet NDSS standards.	A requirement to meet NDSS has been added to the SLP.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Gypsy + Traveller in Allocation Private Amenity Space	Proposals relating to Gypsies and Travelling Showpeople are addressed within a separate policy.	Gypsy and Traveller Policies are addressed seperately within the SLP.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	M4(3) nominations in perpetuity, SR housing higher-100% nomination	This matter falls outside of the scope of the SLP.	No change- these matters are dealt with outside of the SLP.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Sustainability	Intergrated, No gas	National policy will, moving forwards, ensure that new-build homes are not connected to gas.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Future Proof, Sustainable, Deliverable	Noted, the SLP seeks to strike a balance between creating sustainable homes and communities, whilst meeting housing need and providing enough homes to address our identified needs.	The SLP has been tested through a robust viability assessment to ensure that affordable housing requirements is viable.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Viability	Be clear what is required by developer contributions so its clear what is additional grant eligible	The SLP Affordable housing policy outlines clear expectations around the delivery of affordable housing on both land-led and Section 106 sites.	The SLP has provided additional clarity around the expectations in terms of mix and tenure for homes delivered both

					via Section 106 and via additionality.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Double occupancy, tenure switchable	This will be a matter for negotiation between local authorities and applicants.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Interesting and effective use of space	Noted	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Connected, undistinguishable or better than the OM	The SLP seeks to ensure that affordable housing is equivalent to open market homes in terms of the appearance, build quality and materials, to ensure that new developments are tenure blind.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Sustainability	Support EPC C minimum	The SLP will aim to deliver high standards of energy efficiency and sustainability in terms of the delivery of new build homes of all tenures.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Can be dynamic and updated to respond to changing need based on current data	The SLP includes the ability for affordable housing mixes to be changed through written agreement between the applicant and the SLP authority.	The SLP includes flexibility to agree alternative mixes in writing with the SLP authorities.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Robust at appeal	The SLP will be subject to extensive consultation to help make it robust at appeal.	No change

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Clarity for stakeholders	The affordable housing policies have sought to provide greater clarification to applicants around the appliction of affordable housing policy requirements.	The affordable housing policies have sought to provide greater clarification to applicants around the appliction of affordable housing policy requirements.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Flexibility across time- e.g. latest evidence base	The SLP sets out the different types of affordable housing to be delivered, providing clarity to developers and housing associations around the types of affordable housing expected, based on the Housing and Economic Needs Assessment.	The SLP includes flexibility to agree alternative mixes in writing with the SLP authorities- should need change over time.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Mix of tenures	The SLP seeks to deliver a range of affordable housing tenures, with the SLP authorities' identified need reflecting a need for social rent, affordable rent and affordable home ownership tenures.	The SLP identifies a need to deliver a range of affordable housing tenures, providing clarity to developers around the SLP authorities expectations in terms of the delivery of on-site affordable housing
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Defined Tenure Split based on Local Need	The SLP sets out the different types of affordable housing to be delivered, providing clarity to developers and housing associations around the types of affordable housing expected, based on the Hosuing and Economic Needs Assessment.	The SLP identifies a need to deliver a range of affordable housing tenures, providing clarity to developers around the SLP authorities expectations in terms of the delivery of on-

					site affordable housing
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Housing that meets Local Need	The SLP sets out the different types of affordable housing to be delivered, providing clarity to developers and housing associations around the types of affordable housing expected, based on the Hosuing and Economic Needs Assessment.	The SLP identifies a need to deliver a range of affordable housing tenures, providing clarity to developers around the SLP authorities expectations in terms of the delivery of on-site affordable housing
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Mix of tenures	The SLP's affordable housing policy seeks to deliver a mix of affordable housing tenures.	The SLP identifies a need to deliver a range of affordable housing tenures, providing clarity to developers around the SLP authorities expectations in terms of the delivery of on-site affordable housing
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Transport/Infrastructure	These are wider strategic matters which are addressed within the Strategic and Local Plan	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Don't forget infrastructure to support the housing	These are wider strategic matters which are addressed within the Strategic and Local	No change

				Plan	
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Sustainable Communities	The SLP affordable housing policy seeks to create mixed and balanced communities that seamlessly integrate with market homes on new developments.	Additional clarity added that developments should ensure that affordable homes are equitably located to access community facilities and other amenities compared to open market homes.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Build communities locally	The SLP affordable housing policy seeks to create mixed and balanced communities that seamlessly integrate with market homes on new developments.	The SLP seeks to create tenure blind communities through clustering and design arrangements.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Design	On-site delivery and tenure blind	The SLP's affordable housing policy prioritises the delivery of on-site affordable housing and seeks to create tenure blind communities.	The SLP requires that applicants 'must' deliver on-site affordable housing, unless exceptional circumstances are applicable that justify off-site delivery.

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Expectation and Minimum Requirements, Size NDSS, Occupancy, Tenure and Clustering	The SLP affordable housing policy seeks to provide clarification for applicants around the standards expected from affordable housing provided on new developments. A requirement for new developments to meet NDSS has been included within the housing standards policy. Occupancy levels will be agreed by negotiation. Clustering and tenure issues are addressed within the affordable housing policy.	Tenure, clustering and affordable housing mix expectations have all been refined in the latest SLP draft.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Achieve high quality homes- good space standards, enough amenity space, high specification	The specification of affordable housing will need to be agreed by negotiation. The SLP includes	The SLP includes a requirement that new development must meet NDSS standards.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Policy to be in line with Homes England and Government Strategy to deliver affordable housing at pace	By providing greater clarity to developers around affordable housing delivery expectations, it is anticipated that this will reduce negotiation periods and enable the delivery of affordable housing at pace.	Additional clarity has been added to clarify the SLP's approach to delivering affordable housing via additionality.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Design Standards, Environmental, Open Space, Accessibility	All of these issues will be addressed by a range of policies throughout the SLP.	No change, except the SLP includes M4(2) and M4(3) policy requirements.

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Housing Need	Flexibility + Adaptability to account for economic, political and demographic changes	The SLP includes requirements around new homes being built to meet NDSS standards, and sets out requirements around the level of M4(2) and M4(3) homes required on new developments.	The SLP includes specific requirements for both M4(2) and M4(3) homes across all new developments, as well as meeting NDSS requirements- both of these policy requirements will be subject to viability.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Homes fit for use	The delivery fo high-quality homes is a key objective for the SLP.	No change
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Drive for quality, 100% NDSS, EPA A, M4(2), M4(3)	SLP policies will address the energy efficiency of new homes on new developments. The SLP includes requirements around new homes being built to meet NDSS standards, and sets out requirements around the level of M4(2) and M4(3) homes required on new developments.	M4(2) and M4(3) requirements are included within the SLP, with the SLP also including a requirement that new development be built to meet NDSS.
Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Quality Standards	The SLP's affordable housing policy seeks to strike a balance between deliverability, quality and quantity.	The SLP has set optional technical standards around M4(2) and M4(3) dwellings and setting a requirement for NDSS on all new developments, which will be justified by viability.

Starting Discussion	What does/should a great affordable housing scheme include/do/achieve?	Policy Objective	Think about mix that makes a place function well.	The SLP's proposed affordable housing mix includes a range of tenures, which can be varied by written agreement between the applicant and the SLP authority.	No change

Appendix 9 – Vision and Objectives topic paper

Download document – Vision and Objectives Topic Paper