

13 November 2023

Committee	Council (Extraordinary)
Date	Tuesday, 21 November 2023
Time of Meeting	6:00 pm
Venue	Tewkesbury Borough Council Offices, Severn Room

ALL MEMBERS OF THE COUNCIL ARE REQUESTED TO ATTEND

Agenda

1. ANNOUNCEMENTS

1. When the continuous alarm sounds you must evacuate the building by the nearest available fire exit. Members and visitors should proceed to the visitors' car park at the front of the building and await further instructions (during office hours staff should proceed to their usual assembly point; outside of office hours proceed to the visitors' car park). Please do not re-enter the building unless instructed to do so.

In the event of a fire any person with a disability should be assisted in leaving the building.

2. To receive any announcements from the Chair of the Meeting and/or the Chief Executive.

2. APOLOGIES FOR ABSENCE

3. DECLARATIONS OF INTEREST

Pursuant to the adoption by the Council on 24 January 2023 of the Tewkesbury Borough Council Code of Conduct, effective from 1 February 2023, as set out in Minute No. CL.72, Members are invited to declare any interest they may have in the business set out on the Agenda to which the approved Code applies.

4. RECOMMENDATIONS FROM EXECUTIVE COMMITTEE

The Council is asked to consider and determine recommendations of a policy nature arising from the Executive Committee as follows:-

(a) Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan Public Consultation (Regulation 18) 1 - 47

At its meeting on 9 November 2023, the Executive Committee considered the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan Public Consultation (Regulation 18) and **RECOMMENDED TO COUNCIL** that it be **APPROVED** for consultation under Regulation 18 of the Town and Country Planning Act (Local Planning)(England) Regulations 2012; and that authority be delegated to the Chief Executive, in consultation with the Lead Member for Built Environment, to prepare diagrams illustrating the general location of development options for inclusion in the consultation document, and to make any other necessary minor amendments, corrections and additions to the document prior to publication for consultation.

(b) Tewkesbury Interim Housing Position Statement 48 - 60

At its meeting on 9 November 2023, the Executive Committee considered the Tewkesbury Interim Housing Position Statement and **RECOMMENDED TO COUNCIL** that it be **APPROVED** and published to explain the Council's approach to decision-making on planning applications involving the provision of housing; and that authority be delegated to the Associate Director: Planning, in consultation with the Lead Member for Built Environment, to make any necessary minor amendments and corrections to the document prior to publication.

Recording of Meetings

In accordance with the Openness of Local Government Bodies Regulations 2014, please be aware that the proceedings of this meeting may be recorded and this may include recording of persons seated in the public gallery or speaking at the meeting. Please notify the Democratic Services Officer if you have any objections to this practice and the Mayor will take reasonable steps to ensure that any request not to be recorded is complied with.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the public and press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

Executive Director: Resources

TEWKESBURY BOROUGH COUNCIL

Report to:	Executive Committee
Date of Meeting:	9 November 2023
Subject:	Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan – Public Consultation (Regulation 18)
Report of:	Interim Planning Policy Manager
Head of Service/Director:	Associate Director: Planning
Lead Member:	Lead Member for Built Environment
Number of Appendices:	1

Executive Summary:

In July 2023, Cheltenham, Gloucester and Tewkesbury Councils resolved to work together to prepare a single Strategic and Local Plan (SLP). This will replace the existing Joint Core Strategy (JCS) and district local plans. At this formative stage in the process, the task is to undertake public consultation on broad spatial options and policy issues in line with Regulation 18 of the relevant legislation. The statutory purpose of the consultation is to ask people what they think the Plan should contain and help inform emerging priorities. No policy or site allocation proposals are therefore being put forward at this stage. That will follow at a subsequent step in the Regulation 18 process in early 2025.

In summary, the consultation document contains a draft Vision and Strategic Objectives and poses a number of questions around options for addressing climate change and nature recovery, the amount and location of future housing and economic development, Gypsy and Traveller Accommodation, retail and town centres and infrastructure.

It is being proposed to publish the document and invite comment from our various communities, the development industry, infrastructure/service providers and others with an interest in growth for a period of not less than eight weeks commencing in December 2023. This will allow for the consultation spanning the Christmas period.

Recommendation:

That it be RECOMMENDED TO COUNCIL:

- 1. That the Strategic and Local Plan Consultation Document (Appendix 1) be approved for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.**
- 2. That authority be delegated to the Associate Director: Planning, in consultation with the Lead Member for Built Environment, to prepare diagrams illustrating the general location of development options for inclusion in the consultation document, and to make any other necessary minor amendments, corrections and additions to the document prior to publication for consultation.**

Financial Implications:

A budget of £220k per year per district council (Cheltenham, Gloucester and Tewkesbury) was agreed earlier in the year after work was commissioned to evaluate the resources needed to produce the next strategic and local plan. Consultation activities are included within this overall budget.

Legal Implications:

In preparing a local plan, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a local planning authority must notify:

- consultation bodies that may have an interest in the subject of the proposed local plan/as the local planning authority considers appropriate; and
- such residents and other persons carrying on business in the local planning authority's area which it considers appropriate to invite representations

of the subject matter of the local plan which it proposes to prepare and invite them to make representations about what a local plan with that subject ought to contain.

The local planning authority must take into account any representations made to them in response to those invitations and may carry out more than one Regulation 18 consultation in preparing a local plan. There is no minimum period for consultation at this stage of the plan making process, as opposed to the Pre-Submission stage which requires a minimum of 6 weeks.

Under section 19(3) of the Planning and Compulsory Purchase Act 2004 in preparing the local plan the authority must also comply with their statement of community involvement.

Environmental and Sustainability Implications:

The SLP will be a plan to meet development needs in a way which achieves sustainable development, including addressing the causes of climate change, mitigating its effects and promoting nature recovery. The SLP will also include policies to safeguard against other environmental effects of development. All local plans are required to be informed throughout their preparation by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment. A draft SA report has been prepared to inform this Regulation 18 stage, including evaluating the likely sustainability effects of the draft vision, objectives, and spatial options.

The emerging Plan is also required to be accompanied by a Habitats Regulations Assessment (HRA) to ensure adverse impacts on international habitats sites are avoided or, where this is not possible, effectively mitigated. A draft HRA has similarly been prepared to inform this Regulation 18 stage.

Both documents will be available to view online. This is an iterative process and future versions will inform decision making on the emerging Plan as the SLP progresses.

Resource Implications (including impact on equalities):

The SLP is being progressed by Officers across the Planning Policy teams in Cheltenham, Gloucester and Tewkesbury and resourced in part by an agreed joint budget. At later stages, the emerging SLP will be accompanied by Equalities and Health Impact Assessments

Safeguarding Implications:

None

Impact on the Customer:

Public consultation will be designed in a way which will most effectively include Tewkesbury's communities in line with the adopted Statement of Community Involvement.

1.0 INTRODUCTION

- 1.1** In July 2023, Tewkesbury Borough Council approved a Local Development Scheme (LDS) for the preparation of a new Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). Around the same time, Cheltenham Borough Council and Gloucester City Council approved a similar LDS, supporting the progression of the SLP.
- 1.2** The SLP will set out the strategic development strategy; development requirements (for example new homes and jobs); cross-boundary strategic and other policies where there is value in a consistent approach; and 'locality policies', which address issues and opportunities of only local significance.
- 1.3** Once adopted, the SLP will supersede the adopted Joint Core Strategy (JCS), Tewkesbury Borough Plan, the district plans for Cheltenham Borough and Gloucester City Councils and any saved policies, in their entirety.
- 1.4** The purpose of this report is to seek approval from Council to hold the first full consultation on the emerging SLP.

2.0 REGULATION 18 CONSULTATION

- 2.1** At this early stage, the purpose of the consultation is to:
- Introduce the concept of the SLP, the timeframe it should cover and explore the issues the SLP should seek to address.
 - Present and consult on a draft Vision and draft Strategic Objectives, drawing on existing plans and council priorities, strategies and commitments.
 - Explore what will constitute a 'strategic matter' where a single cross-authority policy approach is necessary or desirable, and what are local matters relevant to individual councils or localities only.
 - Consider how the SLP can deliver the legal requirement to adapt and mitigate the implications of climate change, and testing how the statutory development plan can be used to drive action.
 - Consider how much development, such as new homes, retail, employment and infrastructure the SLP should plan for.
 - Consider the alternative options for meeting development needs in ways that deliver genuinely sustainable development, drawing on an updated understanding of the capacity of the main urban areas to accommodate development on brownfield and other sites. To this end, six growth 'scenarios' are identified in the draft document.
- 2.2** At this formative stage in the process, the statutory purpose of a Regulation 18 consultation is to ask people what they think the Plan should contain and help inform emerging priorities. Accordingly, the consultation document relies on emerging evidence, some of which is new and some updating on that of the JCS. Evidence preparation is an ongoing workstream and will be informed by the findings of the Regulation 18 consultation.

- 2.3** Once approved by all three SLP authorities, consultation will commence. This will be undertaken in accordance with each council's adopted Statement of Community Involvement (SCI). Tewkesbury Borough Council adopted a new SCI in March 2022. The consultation will be framed around a series of key questions, supported by events and consultation methods appropriate to the scope of the consultation. It is being proposed to publish the document and invite comment from our various communities, the development industry, infrastructure/service providers and others with an interest in growth for a period of not less than 8 weeks commencing in December 2023. Whilst consultations typically run for a 6 week period, the extended deadline would take into account the intervening Christmas period.
- 2.4** The consultation document will be accompanied by an emerging evidence base. This will include the Housing and Economic Land Availability Assessment (HELAA) which Government requires local planning authorities to maintain. The HELAA is a preliminary assessment, including mapping, of individual sites which have been submitted to the Council for consideration as development options. The consultation document itself will include various diagrams derived from the HELAA, illustrating broadly the various potential development locations being promoted to the councils which would be associated with each of the six growth scenarios. The graphic design work in drawing up these diagrams is currently underway and will be shared with members prior to the consultation launch. It is important to note, however, that the inclusion of land on any accompanying maps or diagrams does not mean it is to be regarded as suitable or even available for development; nor that it will be supported by the local planning authorities. Decisions on preferred options for any sites and locations will only emerge at later stages in the plan-making process (as set out below).
- 2.5** The adopted LDS identifies the intended programme for the preparation of the SLP. Following the consultation which is being proposed in this report, focus will turn to the preparation of a Draft Preferred Options SLP which will include a draft strategy, site allocations and policies. It is scheduled to be published for consultation in early 2025 (also under Regulation 18). To support that stage, it will be necessary to have undertaken a comprehensive body of evidence to justify the Plan and demonstrate its deliverability, including for example detailed transport modelling, an assessment of different site alternatives, and a new assessment of the need for new homes and employment land.
- 2.6** This will be followed by Publication of the Pre-Submission draft SLP (under Regulation 19) in early 2026, followed by Submission to the Secretary of State for independent examination.

3.0 CONSULTATION

- 3.1** Planning Policy Reference Panel.

4.0 ASSOCIATED RISKS

- 4.1** The main risk at this stage relates to the Government's proposal for reform to the planning system, some details of which may emerge during the consultation period. However, the scope of the consultation and the questions that are asked will be relevant regardless of any proposed changes to the planning system.
- 4.2** As part of the consultation events will be held at external venues. Risk assessments will be undertaken to ensure the safety of staff and the community.

5.0 MONITORING

5.1 The outcome of the proposed consultation will be used to frame the preparation of a draft Plan in line with the LDS and the statutory procedures.

6.0 RELEVANT COUNCIL PLAN PRIORITIES/COUNCIL POLICIES/STRATEGIES

6.1 Council Plan – all priorities and objectives relating to place.

Background Papers: Local Development Scheme and various evidence base.

Contact Officer: Interim Planning Policy Manager
lan.bowen@tewkesbury.gov.uk

Appendices: Appendix 1. Draft Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan Consultation Document (Regulation 18)

DRAFT

Cheltenham, Gloucester and Tewkesbury

Strategic and Local Plan

**Issues and Options Consultation
(Spatial options and key policy areas)
October 2023**

Version Control: Council Draft Version 30 October 2023

DRAFT

About this Consultation	1
1. Introduction and context	4
2. Strategic and Local Plan	7
3. Draft Vision and Strategic Objectives	10
4. Planning for climate change and nature recovery	15
5. Planning for community and business	19
New homes	19
Jobs and the economy	24
Retail and town centres	26
Infrastructure	28
6. Planning for sustainable development	30
Scenario 1 Urban concentration	32
Scenario 2: Urban extensions	33
Scenario 3: Urban extensions, avoiding the Green Belt	34
Scenario 4: New strategic settlement	35
Scenario 5: Rural dispersal	37
Scenario 6: Sustainable transport scenario	38
7. Conclusions and next steps	40

About this Consultation

The Cheltenham, Gloucester and Tewkesbury area is home to around 350,000 people, roughly 180,000 of whom are either working or looking for work. The population of the area is growing; it is forecast that an additional 23,000 families will form and make the area their home over the next 20 years. Our area is also an attractive and desirable place for people to move to for lifestyle reasons. The area's strategic location on major road and rail corridors is also expected to assist in continued economic growth with some forecasts projecting a further 36,000 jobs could be created across Gloucestershire by 2041.

The population of the area is also ageing, partly because generally people are healthier and living longer, and younger people often move out of the area.

We have very significant demands and pressures. For example:

- Housing is becoming increasingly unaffordable for people – both to rent and to buy with challenges and concerns around security of tenure. It is widely acknowledged that the nation is facing a housing crisis. In large part, this is due to a shortage in the number of new homes being built and the right type of housing to rent that is affordable or being able to buy at a price they can afford.
- The children of today will soon be grown up, looking for jobs and starting families of their own, without necessarily wanting to move away from their roots. They will need somewhere to live, work and send their own children to school in a way that is affordable. In June 2023 the Office for National Statistics reported that the average UK house price was £288,000, well beyond the reach of many.
- The affordability of rural housing is a particular challenge with recent analysis by the National Housing Foundation reporting that social housing waiting lists grew by 31% in the three-year period up to 2022, compared with a 3% increase in urban areas.
- People in their middle years may be looking forward to a well-earned retirement and will expect to be able to live in homes and neighbourhoods which are suitable for their long-term needs.
- Older people may well need secure, supported forms of accommodation, whilst retaining as much independence as possible.
- People will rightly expect health, transport, education, retail and other essential services and facilities to be of a decent standard and at an affordable level and for services and facilities to keep pace with growth.
- Business leaders see our outstanding environment with easy access to a skilled workforce and good road and rail connections, and want to locate in the area to invest in businesses and job creation in the area.
- Meanwhile, the agricultural sector continues to diversify in the face of acute structural and climate changes, whilst tourism and recreational demand has surged in many areas of the countryside, alongside other new opportunities for the rural economy.
- In addition to the challenges posed by a growing/ageing population and a prosperous economy, other issues to think about are:
- Accessibility and Transport: From a global to a local level, people need to have lower carbon choices available to them including how they travel to access jobs, schools, healthcare, shops and other services, and how they source energy to heat their homes and workplaces.

- Air Quality: New development may exacerbate air pollution issues. The main sources of air pollution come from road emissions with consequential adverse impacts on health and wellbeing.
- Biodiversity and Geodiversity: The conservation of biological and geological diversity (including a reversal of the current trend of biodiversity loss) and the protection and monitoring of endangered and vulnerable species and habitats. The government has introduced a mandatory requirement for 10% Biodiversity Net Gain (BNG) for all developments. There is a need to enhance water quality in watercourses in part to help improve the ecological status of rivers.
- Climate Change: People are concerned by the threats posed by climate change – for example through increased flooding and, extremes of weather and risks to food security. There is a need to increase low-carbon and renewable energy generation and usage. There is a need to increase the quality and quantity of green infrastructure to provide different benefits including improved carbon storage, urban cooling, natural flood resilience/flood water storage. Green infrastructure can provide a more attractive public realm to encourage active travel, as well as providing movement corridors for wildlife.
- Economy: With digital technology and changing social expectations, we are now shopping, working, travelling and spending leisure time in different ways to the past. This is shaping our town centres, employment patterns and how goods are delivered, how we interact and receive services and making us need to rethink how services and infrastructure will need to be planned for.
- Historic Environment: There is a need to protect and enhance heritage assets.
- Landscape and Townscape: There is a need to ensure that certain areas of particular importance are protected, which includes the Cotswold Area of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), Cotswold Beechwoods Special Area of Conservation (SAC), and Local Green Space. There are also more sensitive areas within townscapes that will need to be protected and enhanced.
- Natural resources: New development on greenfield land would be likely to result in irreversible loss of soil including the Best and Most Versatile agricultural land. New development and increased population would be likely to place pressure on water resources. There is a need to consider the potential impact on water quality.
- Population and Health: There will be increased pressure on health facilities. There are health inequalities, particularly in Gloucester City. There are various pockets of deprivation. There is also social isolation and loneliness amongst the wider population. It is important to support strong, vibrant and healthy communities.

Plan-making is central to delivering change. By way of example, this can be seen through the progress of the Golden Valley Development. Starting from a strategic allocation in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy in 2017, this scheme is now progressing on its planning journey to create a vibrant, pioneering Garden Community integrating hi-tech business, residential and leisure uses, and creating a destination of global significance. By understanding our economy and facilitating the jobs and skills for local people, we can build a resilient and sustainable long-term strategy for growth.

We should also be mindful that the population and development pressures will materialise whether we plan for it or not. But the cost of failing to prepare a plan would result in great uncertainty as to where and how development would take place. It would lead to unplanned development which

would not occur in tandem with co-ordinated new infrastructure and would not enable a co-ordinated approach to climate change mitigation and nature recovery.

We must respond now by making long-term decisions over how our area should look and feel in the future. We need a plan. This consultation marks an important early step in preparing a Strategic and Local Plan – or “SLP”. The SLP will apply to the whole area covering Cheltenham, Gloucester and Tewkesbury and will address the issues outlined above. The councils need your help in drawing up that Plan.

What is a Strategic and Local Plan and why do we need one?

Once agreed, the SLP will set out a vision for at least 15 – 20 years for our part of Gloucestershire to address exactly the sorts of complex growth needs described above. It’s about making decisions now for a future which will give everyone the best possible chance to live healthy and prosperous lives in whatever way they may choose. It’s equally important that we do this in ways which will not prevent future generations from also doing so.

The three councils are working together to draw up the Plan because, although we are separate councils with our own unique identities, the issues we are trying to address (things like housing needs, employment, environmental and climate change action), and the policies that will be needed to solve them, do not fit neatly to administrative boundaries. These are shared questions which will require shared answers.

Thinking about individual experiences, we may live in one area but go to work in another or we may spend leisure time in one area but access school or health services in another. Our Plan needs to recognise the complex ways in which people live their day-to-day lives.

So, we are working together to make sure we are being as effective as we can in making sure the needs of the existing population as well as the growth needs of future generations are met.

1. Introduction and context

- 1.1 Since 2008, Cheltenham, Gloucester and Tewkesbury councils have worked together to produce a strategic plan covering their three areas. This resulted in the adoption of the Joint Core Strategy (JCS) in 2017, which provided a strategy for how the three areas would develop.
- 1.2 Major changes have happened since then including the effects of a global pandemic. that has touched our lives in many ways. As councils we have recognised climate change and ecological emergencies and understand that we have an active role to play in managing change that has these principles at its heart.
- 1.3 The three authorities have sought to influence national planning policy, including through responding to government consultations and lobbying by Councillors. Through the journey of the plan making route of the SLP, we anticipate change, but it is important that we make progress and build a plan that is flexible and able to adapt.

What's happened so far?

- 1.4 In the summer of 2023, the three councils agreed to produce a single plan rather than separate plans. The new approach to plan-making for the three local authorities was agreed through an update to their Local Development Schemes in July 2023. The new plan will be called the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). Gloucestershire County Council has also joined the SLP as a partner.
- 1.5 The councils have worked with other councils in Gloucestershire to produce evidence to support the emerging plan. This includes information on how many new homes and jobs might be required in our area, and a review of issues and opportunities in our city and town centres.
- 1.6 Much more evidence gathering is either underway or will be produced later, including for example a new strategic flood risk assessment and a review of the Green Belt. More information is available on our website (insert website link).

What is the purpose of this consultation?

- 1.7 Now that the new approach to plan-making has been agreed by Cheltenham, Gloucester and Tewkesbury councils, we want to present what work has been completed so far and engage with you on some key matters to help further develop the principles and priorities. These are:
- a) What should the Vision be for the SLP? (i.e., what will the area be like as a place to live by the end of the plan period?)
 - b) What Strategic Objectives are necessary to deliver the Vision?
 - c) What are the strategic, cross-boundary issues and opportunities where a shared policy approach is necessary or desirable?
 - d) What are the local issues and opportunities that each council should address in its own section?
 - e) How much development is needed and are there any priority locations for growth?

- f) Are there areas where growth should not take place or where it would be unsustainable?
- g) How could development be delivered in a way that meets the Vision?
- h) How should the plan respond to climate change and ecological emergency?
- i) How should the plan ensure that Cheltenham, Gloucester and Tewkesbury thrive for our residents, businesses and visitors?

1.8 At the end of each section there are a set of questions that we'd like to explore.

Responding to the consultation

1.9 This focused consultation will last for XXXXXXXX weeks between XXXXXXXX and XXXXXXXX. Comments should be received by 11.59pm on XXXXXXXX.

1.10 To raise awareness and encourage feedback, some events have been organised where officers will be on hand to answer questions. Full details, along with details of how to respond to the consultation are available on the SLP website.

1.11 The councils will review all comments that are made and will summarise the main issues. These will be used to help shape the next stage of the SLP.

Working with other councils and stakeholders

1.12 Councils have a duty to engage with other local authorities and stakeholders in seeking to address strategic, cross-boundary planning matters. The Gloucestershire district councils and county council have formalised this in preparing an agreement to a 'Gloucestershire Statement of Common Ground' (SoCG). This includes 37 agreements on different issues such as climate change, the delivery of development needs, flood risk and transport and has been approved by all the councils.

1.13 At this early stage in the SLP process, conversations are ongoing on the various strategic planning matters and will continue as the plan progresses.

Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitats Regulations Assessment

1.14 The SLP will be a plan to meet development needs in a way which achieves sustainable development, including addressing the causes of climate change, mitigating its effects and promoting nature recovery. The SLP will also include policies to safeguard against other environmental effects of development. All local plans are required to be informed throughout their preparation by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment. A draft SA report has been prepared to inform this Regulation 18 stage, including evaluating the likely sustainability effects of the draft vision, objectives, and spatial options.

1.15 The emerging Plan is also required to be accompanied by a Habitats Regulations Assessment (HRA) to ensure adverse impacts on international habitats sites are avoided or, where this is not possible, effectively mitigated. A draft HRA has similarly been prepared to inform this Regulation 18 stage.

1.16 Both documents are available to view on-line. This is an iterative process and future versions will inform decision making on the emerging Plan as the SLP progresses.

Planning reform

- 1.17 At the time this consultation is being undertaken, the Government is progressing various changes to the planning system. If implemented, these will lead to significant change and will impact the way Plans are prepared, what they look like and how long they take to prepare.
- 1.18 However, at this stage of the process, the councils are exploring broad issues with the community and stakeholders, such as the plan timeframe, what it should address, how much development is needed and how could that be delivered sustainably. This should be relevant to the plan, regardless of the system within which it is prepared.
- 1.19 The councils are very aware that plans take a long time to prepare and there are many benefits of having an up to date, adopted plan. With that in mind, the councils are keen to progress the preparation of the SLP as quickly as possible. Key milestones are set out in the approved Local Development Schemes.

DRAFT

2. Strategic and Local Plan

2.1 The SLP will be a new plan that will cover the areas of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council. The area covered by the SLP is shown in the map below:

Map showing area covered by the SLP:

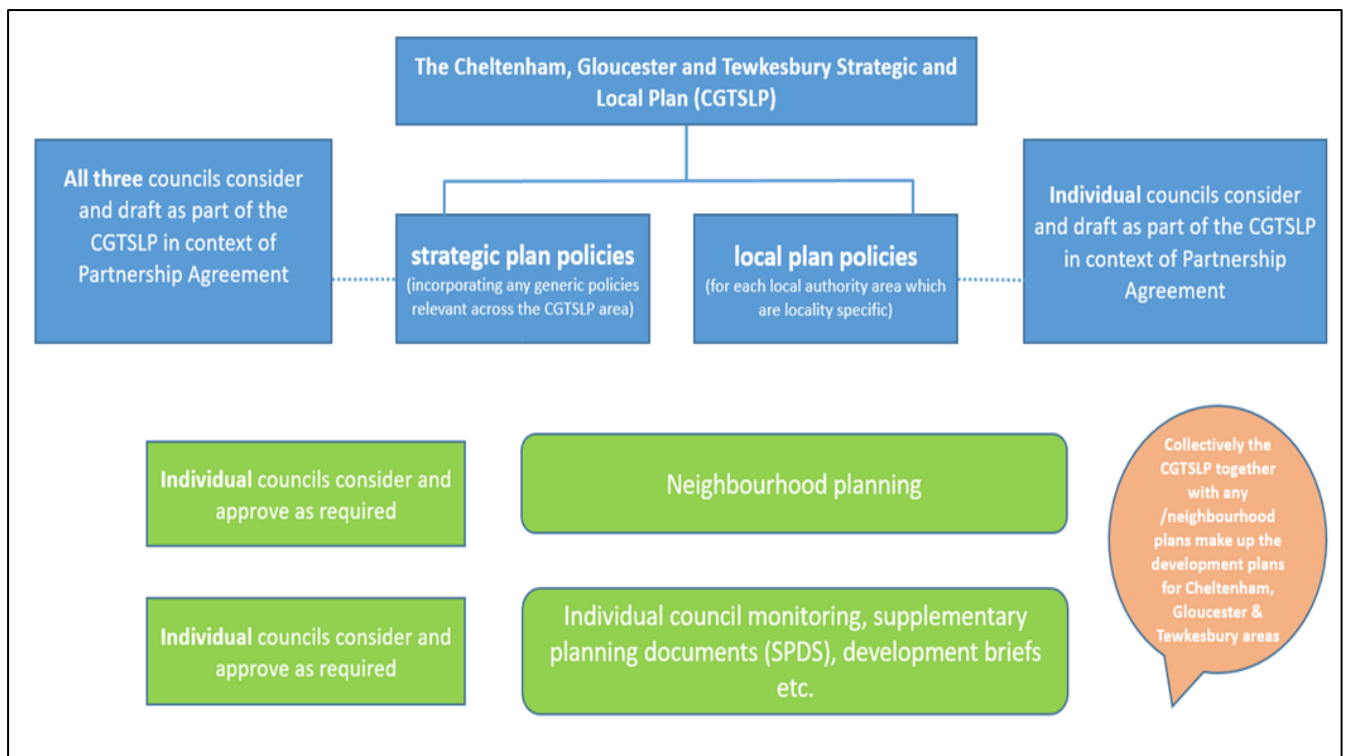
Insert map showing extent of SLP area

2.2 It will be a document containing policies which are used in making decisions on planning applications. It will:

- Set a clear vision, strategy and policies for how the area will grow, providing clarity for what development will and will not be acceptable.
- Set out requirements for the delivery of new homes, jobs and infrastructure to meet the needs of the community and the local economy in a way that is sustainable and addresses our commitments to climate change.
- Provide a strategic framework for Neighbourhood Plans, which can be developed by communities.

2.3 Taken together, the SLP, along with Neighbourhood Plans (which are approved by local communities through a referendum process), the Waste Local Plan and Minerals Local Plan (both prepared by Gloucestershire County Council), form the statutory 'Development Plan' for our area. The development plan comprises a number of different documents that set out planning policies, which are used to decide whether to approve planning applications and to seek to ensure that the right type of development takes place. The proposed structure of the SLP is shown below.

Diagram showing the structure of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan



- 2.4 It is intended that the SLP will provide strategic policies that cover the entirety of the council areas. The National Planning Policy Framework (NPPF) defines, at paragraph 20, what strategic policies should cover:

‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- (a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- (c) community facilities (such as health, education and cultural infrastructure; and*
- (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change and adaptation.’*

- 2.5 Strategic policies should look ahead at least 15 years from when a council adopts the plan but can look further ahead for larger scale developments to take into account timescales for the development(s). They should not go into detailed issues. The SLP will then include separate sections that cover each local authority area only, providing ‘locality policies’ that address issues and opportunities specific to that area.
- 2.6 The approach taken in the currently adopted plans for Gloucester and Cheltenham councils is that the JCS provided all of the strategic policies, and the district plans provided locality policies. The Tewkesbury Borough Plan took a slightly different approach in providing both strategic and locality policies.

- 2.7 The SLP is an opportunity to reconsider what issues are of strategic cross-boundary importance where a single overarching policy approach is necessary or desirable. Equally, what is a local matter that is just relevant to one of the councils and should be a locality policy. This will remove repetition and duplication and help with the useability of the Plan.
- 2.8 It is also necessary to consider what time frame the SLP should cover. As discussed above, the Government requires a plan to cover a period of at least 15 years from the point of adoption. Where the plan includes larger sites that will take longer to develop, the vision and policies can cover a long period of at least 15 years.
- 2.9 At this early stage, preferred development sites have not been identified. However, sites promoted to the councils to date including by landowners, agents and the wider community are presented. It should be emphasised that this consultation does not seek to allocate sites but presents them as part of the wider evidence base. Some sites are big enough to justify a longer period if they were to be chosen. However, the longer the timeframe of the plan, the greater the need for development and infrastructure that will need to be addressed in the plan.
- 2.10 The current timetable for the SLP is for submission to the Secretary of State in April 2026. The Secretary of State will then appoint an independent Planning Inspector who will then examine the SLP. On this basis, the SLP would need to plan up to at least 2041. Finally, once adopted, it is intended that the SLP will replace all policies in the JCS and district plans. It will then be necessary to review the SLP every five years.
- 2.11 It is also important to consider what the SLP will not cover. With plan making in the past, we have often extensively duplicated elements of planning policy that are set out in the NPPF and Planning Practice Guidance (PPG). This can increase complexity and at times be confusing for users of the development plan. Therefore, we will aim for the SLP to be focussed, remove duplication, and provide appropriate signposting.
- 2.12 As you review the following summaries of key issues and questions, we ask you to be focussed and succinct in your responses. This will aid drawing together the consultation response report as quickly as possible and will assist in identifying the main issues raised.

Questions

- 1. How far into the future should the Strategic and Local Plan cover?**
- 2. Are there any strategic policy topics, not identified above (paragraph 2.4), which should also be considered?**
- 3. What local policy topics are unique to only a council area, neighbourhood or community?**

3. Draft Vision and Strategic Objectives

- 3.1 The SLP needs to provide a positive Vision for the development of the area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings (NPPF, paragraph 15).
- 3.2 The Vision should be supported by Strategic Objectives, which set out the key ways that it will be delivered. The Vision and Strategic Objectives provide the foundation on which the plan's strategy and policies are then based. Visions should be bold and ambitious, but realistic, and set the approach for at least the next 15 years.
- 3.3 The adopted JCS and district plans provide the most recent Vision and Strategic Objectives for our area. These drew on the priorities of the councils and national planning policy at that time. Since this time however, the councils have reviewed and updated their priorities, for example through the preparation of new corporate strategies and plans. The Government's expectations and priorities for local plans has already changed, with the publication of a new NPPF. As a result, there are a number of key planning issues which the SLP will need to address, and which will shape the Vision and Strategic Objectives. The key issues are:
- a) The need to address the causes and mitigate the effects of climate change.
 - b) The need to promote nature recovery.
 - c) Recognising and addressing the implications of an ageing population and improving health opportunities alongside creating opportunities for our young people to want to stay in our area rather than needing to look outside of the SLP area due to a lack of opportunities.
 - d) Ensuring the right amount of land for homes and employment is identified to meet needs throughout the duration of the Plan's period.
 - e) Ensuring that people can access the right types and sizes of homes at an affordable price, including those with specialist housing needs such as travellers and people with disabilities.
 - f) Ensuring new homes and jobs are provided in locations where services and facilities, including community facilities, can be accessed by a choice of means of transport, including public transport, walking and cycling.
 - g) Providing the right types of employment land to meet the needs of modern urban and rural business and as a vehicle for inward investment.
 - h) Putting placemaking at the heart of development and securing high quality design and respecting the character of our existing communities and the surrounding landscape.
 - i) Managing town, city and other centres in a way which responds to changing shopping and leisure habits, including in the rural area.
 - j) Identifying and facilitating the infrastructure, including (but not limited to) education; transport, e.g. mass rapid transit routes; health; e.g. GP surgeries; green infrastructure, and digital infrastructure, that are needed to support growth and our communities.
 - k) Ensuring the SLP's proposals are viable and deliverable.
- 3.4 Considering these issues, a review of the existing Vision and Strategic Objectives has been undertaken and a new draft provided below for comment. Many of the elements of the existing Vision and Strategic Objectives remain valid. For example, the need to deliver the

right amount and type of new homes and jobs and ensuring that developments occur in sustainable locations.

- 3.5 However, some elements need updating or there is a need to reflect a new or stronger priority. This includes for example the need to address the implications of climate change, with each council making strong commitments that require delivery over the coming years and importantly, through the SLP.

Draft Vision

By 2041, and beyond for larger scale developments, the Cheltenham, Gloucester and Tewkesbury area will have harnessed the opportunities of green growth to create thriving, beautiful, energy efficient, resilient and healthy places. Growth will have afforded the highest possible quality of life for all in a manner which achieves carbon reductions and addresses the causes and effects of climate change.

Investment in training, skills and development will have attracted and retained a younger workforce and provided new premises and flexible workspaces to support a flourishing circular economy in both urban and rural areas. Inward investment, innovation and growth in key sectors including, amongst others, cyber and digital-tech, food/agri-tech, advanced engineering and tourism will have been fostered.

People's housing needs will have been met through the provision of sustainable, high-quality market, affordable and other specialist homes set in beautiful, safe places and conforming to sustainable standards of design and construction. The focus will have been on making best possible use of brownfield sites in built up areas and large-scale, comprehensively planned new development to ensure our valuable green spaces and highest quality farmland are preserved. The vital role of the area's city centre, town centres and high streets will have been improved through careful management of development and land uses.

Growth in sustainable locations will have enabled the provision of healthy, accessible and walkable neighbourhoods, the promotion of active travel and sustainable travel, and provision of new transport systems that work for local people.

Growth will have been supported by the provision of a range of essential digital, transport, community and other infrastructure. Equally, alongside conserving the area's special landscapes and its attractiveness as a place to visit, a network of interconnected green spaces and waterways will have secured a high-quality environment for people and nature. Together with necessary retention and management of existing sports and leisure facilities, this will have unlocked opportunities for healthy lifestyles, inclusive access to sport and recreation, active flood risk management and improvements to biodiversity.

The area's thriving cultural offer will have flourished, and its rich diversity of heritage assets preserved through carefully considered developments and enhancements.

Draft Strategic Objectives

Meeting the challenges of climate change

- 1. Ensure that growth contributes to decarbonisation through reduced reliance on fossil fuels and achievement of biodiversity net gain; and the delivery of zero and low carbon development that is resilient and adaptable to climate change incorporating measures to aid urban cooling and biodiversity such as green walls and tree planting.**
- 2. Ensuring growth takes place in sustainable locations that minimise the need to travel and provide genuine sustainable transport and active travel options.**
- 3. Making the most effective use of previously developed land, including higher density development in city and town centres and other locations well served by public transport.**
- 4. Ensure development effectively integrates with existing development, and/or is a self-contained development that provides shops, services, facilities through walking, cycling or public transport.**
- 5. Delivers low and zero carbon energy development, making the most effective use of renewable energy opportunities, both in new developments and off-site energy generation.**
- 6. Ensure development is located in areas that are not liable to flooding, considering the implications of climate change, making effective use of sustainable drainage systems and natural flood management techniques. Ensure that existing infrastructure is adequately protected from the threat of flooding, and that existing flood defences are protected and enhanced.**
- 7. Ensure development incorporates measures to reduce waste.**
- 8. Ensure people can make carbon friendly choices at home by providing easy to use cycle storage, covered space to dry washing outside, space to grow food and compost.**

Building strong, competitive and sustainable urban and rural economies

- 1. Providing the right conditions and sufficient land in the right locations to support existing and new businesses and deliver the 'green growth'.**
- 2. Improve the area's economic resilience, supporting a highly skilled workforce, skills and educational development attainment. Providing the right environment for business start-ups, entrepreneurship, and the improvement and expansion of education and training facilities to develop the skills employers need.**
- 3. Supporting the needs of agricultural businesses, encouraging farm diversification, the development of small rural business units, the conversion of existing buildings for rural business use, appropriate expansion of existing businesses.**
- 4. Supporting effective home working through provision of housing with adequate space and services.**
- 5. Developing the area's role as a tourist destination, building on the unique and varied cultural offer that already exists.**
- 6. Ensuring access to high speed, reliable full-fibre broadband connectivity in both urban and rural areas.**

Ensuring strong and vibrant city and town centres

1. ***Ensuring a network of city and town centres that meet the needs of communities, including supporting cultural uses and events, and that are able to respond and evolve as the role and function of centres changes.***
2. ***Support the provision of a wide range of different uses appropriate to city and town centres, including new homes, to create activity at different times of the day and build an active city and town centre community.***
3. ***To draw on the uniqueness of the different centres in planning for their future.***

Delivering a wide choice of homes that meet the needs of our communities

1. ***Delivering sufficient new homes in the right places to meet the needs of our communities, including market and affordable, specialist homes (e.g. older persons), Gypsy, Travellers and Travelling Showpeople and those wishing to build their own homes (self and custom build homes).***
2. ***Delivering housing of the right size, type and tenure to create mixed and balanced communities, in sustainable locations and with good access to shops, services and facilities.***

Delivering well designed, beautiful and safe places

1. ***Supporting the creation of high quality, beautiful and sustainable buildings and places through good design.***
2. ***Ensuring that new development is integrated well with existing communities and providing well-located infrastructure which meets the needs of communities;***
3. ***Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.***

Prioritising sustainable transport and active travel

1. ***Reducing the need to travel by creating real options for healthy, accessible and walkable neighbourhoods where key services are available without the need to use motorised transport;***
2. ***Promoting the use of sustainable travel modes by improving existing and providing new frequent public transport links and safe walking and cycling routes in all new developments;***
3. ***Reducing reliance on the private vehicle by improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives in the Local Transport Plan;***
4. ***Creating a genuine choice between different modes of transport by integrating new development with existing networks and enhancing these wherever possible.***

Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments

1. ***Protecting and enhancing the area's unique historic and cultural environment, archaeological heritage and geological assets whilst enabling appropriate development that facilitates the cross-cutting objectives of sustainable development;***

- 2. *Conserving, managing and enhancing the area's unique natural environment and biodiversity, including its waterways, Sites of Special Scientific Interest (SSSI), the Cotswolds National Landscape, and areas of landscape and biodiversity importance, and maximising the opportunities to use land to manage flood water;***
- 3. *Ensuring developments support green infrastructure and improve existing green infrastructure within urban and rural areas to provide movement corridors for people and wildlife.***

Promoting healthy and resilient communities

- 1. *Delivering new developments that are supported by the necessary social and community infrastructure, including schools, open space, playing fields, community facilities and green and blue infrastructure and promote community cohesion.***
- 2. *Supporting and safeguarding village shops that serve the everyday needs of local communities.***
- 3. *Delivering new developments that are fully integrated into the green infrastructure network to allow people access to nature and green spaces to maximise wellbeing and active travel opportunities.***
- 4. *Ensure new developments create high quality living environments and prioritise health and mental wellbeing.***
- 5. *Ensure that all homes have useable functioning amenity space that allows residents the opportunity to live, work and relax outside.***

Questions

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

4. Planning for climate change and nature recovery

- 4.1 The SLP will need to support the transition to a low carbon future and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. It will also need to respond to a significant decline in biodiversity over many decades and protect important habits and support nature to recover.
- 4.2 The proposed Vision and Objectives set out that the SLP should meet the challenges of climate change, deliver green growth, prioritise sustainable and active travel, making as much use of brownfield land, ensuring nature recovery, and promoting healthy and resilient communities.
- 4.3 This would mean ensuring:
- Development is located in the most sustainable locations.
 - New homes and buildings are of high quality, low and zero carbon, and energy efficient whilst creating and storing their own energy.
 - Providing secure and local energy supplies; making the places people live and work rich in wildlife and close to valuable natural spaces.
 - Making it easier for people to move around in healthy ways to access services close to their homes without relying heavily on the private car.
 - Protecting people and infrastructure from flooding.
 - Encouraging the reuse of existing resources, including the conversion of existing buildings.
 - Supporting renewable and low carbon energy and associated infrastructure.
 - Supporting measures to promote conservation, restoration and enhancement of priority habitats, protect and support the recovery of priority species, and support biodiversity improvements.

Issues

- 4.4 Scientists have widely reported that the UK's first 40°C day, in summer 2022, was the clearest indication yet that climate change has arrived in England. The Government advisory body, The Climate Change Committee has noted increases in heat related deaths and the disruption to infrastructure climate change is causing in the UK, and that its impacts will intensify in coming decades.
- 4.5 The UK Government and each of the SLP councils have declared a climate change emergency. In the face of this emergency, the councils have committed to become net zero (achieving a balance between the carbon emitted into the atmosphere, and the carbon removed from it) by 2045 at the latest. There are clear objectives and national targets in place to limit global temperature rise to 1.5. The UK has legally pledged to reduce economy-wide greenhouse gas emissions by at least 68% by 2030, and a 78% decrease in all emissions by 2035.
- 4.6 There is also a recognition that there has been a significant decline in living organisms over many decades, including animals, insects, plants, bacteria and fungi. The 'State of Nature' report from 2019 suggests there has been a 13% decline in the abundance of wildlife in the UK since the 1970s. It is essential that this decline is reversed, and measures are put in place to address this.

- 4.7 Certain habitats are also protected by law, for example Special Areas of Conservation (SAC), Special Protection Areas (SPA) and sites designated under the Ramsar Convention (Ramsar sites). They are protected by law because of their international importance. This includes, amongst others, the Cotswold Beechwoods SAC (located in Stroud District Council's area) and the Severn Estuary SPA and Ramsar site (located in the Forest of Dean District Council's area).

Policy framework

- 4.6 Local planning authorities are bound by a legal duty, to ensure that, taken as whole, planning policies contribute to the mitigation of, and adaptation to, climate change. The NPPF similarly requires a proactive approach to mitigating and adapting to climate change. It states that new development should be planned for in ways that help to reduce greenhouse gas emissions and provide a positive strategy for renewable and low carbon energy and heat.
- 4.7 It further requires that *“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.”*
- 4.8 We know that climate change is bringing wetter winters and hotter, drier summers. It is important that the growth required to support our increasing population does not harm to the climate or the natural environment.
- 4.9 In terms of biodiversity, the Environment Act 2021 introduced a mandatory requirement for 10% 'Biodiversity Net Gain' (BNG), which comes into force in January 2024. This means that through development, the natural environment will be left in a measurably better state than it was beforehand. If possible, this should happen on-site.
- 4.10 The NPPF requires Plans to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. Local plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. Plans should also identify and pursue opportunities for securing BNG.
- 4.11 It will be necessary to assess the likely impact on internationally protected sites, arising from growth, e.g. through more people living nearby, and worsening air quality. Emerging evidence will be kept up to date on the councils' websites.

The role of a local plan

- 4.12 In line with the NPPF, the SLP will need to take a proactive approach to mitigating and adapting to climate change, and supporting nature protection and recovery in a way that creates better and more equitable lives for the people of Gloucestershire. There are many areas where plan making can take action. These can be summarised as:
- Built environment – buildings, streets and hard landscaping such as public squares and car parks. The places where we live, work, access shops and services, what those places look like, where they are located, and how they function and are heated and cooled.

- Natural environment – Landscaping, open spaces, gardens, trees, woodland, hedgerows, plants and animals and their habitats, soil, ponds, streams, rivers and canals, and the flood plain.
- Movement – how we get around between places by supporting delivery of public transport, pedestrian and cycle links.
- Renewable energy – energy from sources that do not deplete (such as the sun, wind, geothermal, tidal) to heat, cool and run the built environment without creating harm to the natural environment.

4.13 The table below outlines some of the policy actions within each of the above categories that we might consider through the SLP.

Climate Change			
Built Environment	Natural Environment	Movement	Renewable Energy
Energy efficient homes, practical homes, the right location, layout, density, amenity space, design, materials, waste, allotments, air pollution, reuse, retrofit schemes, heating and cooling, insulation.	Flooding, sustainable urban drainage, green infrastructure, biodiversity (plants and animals), protecting soil, beautiful places, shading, sustainable urban drainage, agricultural land and food security, open space, management of waste and pollution, creation of carbon sinks through tree planting and wetland creation.	Sustainable transport, active travel, choice, proximity of jobs, shops and services, low emission vehicles, e-bikes, cycling and walking.	Homes and businesses generating their own power, making the most of wind and solar opportunities, air source heat pumps, ground source heat pumps, phasing out gas, decentralised, combined district heating.

- 4.14 While the focus of this element of the consultation is to engage people on the ways in which the SLP can respond to climate change, consultants working on behalf of the councils have prepared a Phase 1 Renewable Energy Study. This looks at locations across the SLP area that could be suitable for different forms of renewable energy, such as wind and solar. The study can be accessed via the SLP website. The Phase 2 study will focus on opportunities, including those that could be delivered through site allocations.
- 4.14 For nature recovery, there is an opportunity for the SLP to consider going beyond the minimum 10% improvement in biodiversity required by the Environment Act. However, this would be an additional cost to developers, and it is important to be mindful of viability, which is a challenge in some parts of the SLP area.
- 4.15 Where BNG is to be delivered offsite, the councils would like this to happen in a coordinated way that benefits the SLP areas and Gloucestershire more widely. The councils would like to

explore, through this consultation, if there are any site opportunities for BNG that the councils should consider.

- 4.16 With internationally protected sites, as discussed earlier it will be necessary for the SLP to assess the likely impact on those sites resulting from development, and to ensure that negative impacts are mitigated. The approach taken at present for most developments where there would be an impact, is for either the impact to be addressed on-site, or for a payment to mitigate elsewhere. That payment is used to:
- a) Provide measures on site (for example this could be a warden, new signs or paths), and
 - b) Deliver alternative sites, known as 'Suitable Alternative Natural Greenspace' (SANG), that are attractive to use and provide a genuine alternative for people to use, reducing pressure on the protected site.
- 4.17 To support this consultation, independent consultants have prepared a Habitats Regulations Assessment, which is available to view on-line.
- 4.18 Through this consultation, the councils would like to explore whether there are sites that should be considered as opportunities for environmental purposes through the SLP. This includes wildlife / biodiversity net gain and SANG, as well as recreation, flood risk mitigation, cooling and shading, carbon storage and food production.

Questions

6. In what ways do you consider the Strategic and Local Plan can most effectively address the impacts of climate change?
7. What measures and standards should the Strategic and Local Plan introduce in respect of the:
 - a. Construction and operation of new buildings?
 - b. Retention and reuse of existing buildings?
8. Should the Strategic and Local Plan require more than the mandatory minimum 10% Biodiversity Net Gain through development?
9. Are you aware of any land that could be identified for environmental purposes, such as wildlife / biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production?
10. Which key services and facilities do you think are most important to be provided within easy reach of developments?
11. Should we allocate sites in the SLP specifically for renewable energy generation or storage?
 - a. If so, what forms of renewable energy would be appropriate and in which locations?

5. Planning for community and business

- 5.1 A key part of good planning is ensuring that those who live in the area now as well as those who may live in the area in the future have a home that meets their needs. Whether that be an older household wishing to downsize; a young professional wishing to move out of their parents' home; or a growing family needing more space.
- 5.2 The planning system has a key role in addressing housing pressures and particularly the affordability of housing. This chapter explores what the housing policies in the SLP could look like to help to deliver the right homes in the places where they are needed.

New homes

What type of new homes might be needed?

- 5.3 It is important to understand the types, sizes and tenures of homes that will be required to meet the wide range of different groups in the community.
- 5.4 The NPPF makes it clear that the housing needs of those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes should be catered for in local plans. However, this is not an exhaustive list. For example, some people express an interest for community-led housing, including co-housing, and other innovative forms of housing such as tiny homes.
- 5.5 The existing Local Housing Needs Assessment (2020) provides a snapshot of evidence in relation to the range of housing needs in our area. The councils will be updating this evidence. In the meantime, we would like to hear your views as to what forms of accommodation you think we should plan for in the SLP.

Affordable housing

- 5.6 Housing is becoming increasingly unaffordable for people – both to rent and to buy with challenges and concerns around security of tenure. It is widely acknowledged that the nation is facing significant housing challenges. This includes a lack of affordable homes and rents that are increasingly unaffordable.
- 5.7 The children of today will soon be grown up, looking for jobs and starting families of their own, without necessarily wanting to move away from their roots. They will need somewhere to live, work and send their own children to school in a way that is affordable. In June 2023 the Office for National Statistics reported that the average UK house price was £288,000, well beyond the reach of many.
- 5.8 The affordability of rural housing is a particular challenge with recent analysis by the National Housing Foundation reporting that social housing waiting lists grew by 31% in the three-year period up to 2022, compared with a 3% increase in urban areas.

Housing for older and disabled people

- 5.9 The SLP will need to ensure that the needs for housing for older and disabled people are addressed. The PPG sets out advice on the different types of specialist housing designed to meet the diverse needs of older people, which can include:
- Age-restricted general market housing.
 - Retirement living or sheltered housing.
 - Extra care housing or housing-with-care.
 - Residential care homes and nursing homes.
- 5.10 Other models of housing delivery include co-housing, including for seniors, which are created and run by residents, based on the intention to live with groups of people with similar needs and desires.
- 5.11 The SLP will similarly need to consider the need for accessible and adaptable housing to enable disabled people to live more independently and safely, with greater choice and control over their lives.

Student accommodation

- 5.12 Within our area there are three further education establishments: the University of Gloucestershire, the University of the West of England and Gloucestershire Royal Hospital. Outside of the area, but in close proximity, is Hartpury University and College. There have been recent investments, for example the conversion of the former Debenhams building in Gloucester City Centre as a new campus for the University of Gloucestershire. This is due to open in September 2024 and once fully open, will provide brand new teaching facilities for 4,500 students. To support the growing student population there have also been significant new student accommodation developments, including Pitville student village in Cheltenham and Blackfriars in Gloucester.
- 5.13 Through the SLP, it's important to support the delivery of new student accommodation to meet the needs of the growing universities and further education establishments. However, this form of accommodation tends to be used by students in their first year, with private sector housing used for later years. This can cause problems with the loss of family housing to student lets and issues arising from the loss of character of an area.

Traveller communities

- 5.14 The accommodation needs for Gypsies, traveller and boat dwellers is an area where specific evidence is required under Government policies, and so this is addressed in the section below.

How many new homes?

- 5.15 In deciding how much housing will be needed, the Government provides local planning authorities with a starting point based on a formula known as the 'standard method'. This uses various inputs to determine a minimum average annual need figure for new homes, including average population (household) growth and the affordability of housing in the council area. It is updated periodically to reflect changes.
- 5.16 The most recent evidence produced collectively by the Gloucestershire councils was set out in the Gloucestershire Local Housing Needs Assessment, which was published in 2020. In

respect of annual housing needs, this reflected the standard method figure applicable at the time. The current figures based on the standard method are set out in the table below.

Table showing current annual local housing need for each Council (based on standard method).

Council area	Annual need for new homes	20 year need for new homes
Cheltenham Borough	547	10,940
Gloucester City	681	13,620
Tewkesbury Borough	557	11,140
Total	1,785	35,700

- 5.17 The NPPF makes clear that alternative approaches to the standard method in deciding the number of homes needed may be adopted where there are exceptional circumstances to do so, and where this would also reflect current and future demographic trends and market signals.
- 5.18 The councils therefore need to consider whether there is any such exceptional justification for calculating local housing needs using a method other than the standard method, which may result in a need for more, or fewer, homes than set out in the table above. An example may be where an area has such significant plans for economic growth that it would attract more people to its area, requiring more homes. Although our current evidence exploring economic growth forecasts and their relationship to the need for new homes have concluded there is currently no justification for amending the needs figures, this evidence is required to be kept under review.
- 5.19 It is important to note, however, that the housing need figure is only the first step in deciding how many homes should actually be planned for – this is known as the “housing requirement”. The housing requirement will need to be determined on the basis of an understanding of individual site constraints and opportunities.
- 5.20 It is important to note that the sites identified in the JCS, district plans and other sites with planning permission will deliver new homes in the new timeframe for the plan (the JCS and district plans covering up to 2031). This includes large sites that have planning permission and are delivering new homes at Twigworth, Innsworth, Brockworth and Churchdown. A large number of homes required are therefore already accounted for.

Questions

- 12. Should the Strategic and Local Plan use the local annual housing need calculation from the Standard Method?**
 - a. If no, please set out what you consider the councils should use instead.**
- 13. Are there any constraints or other reasons why the number of houses to be actually planned for in the Strategic and Local Plan should differ from calculated needs?**
- 14. Are there any specific types, sizes or tenures of housing that the SLP should require for particular groups in the community?**
 - a. If so, please explain further.**

Traveller Communities

- 5.21 Councils need to assess the need for new homes for all communities, including traveller communities. This includes Gypsies, Roma, Travellers, Travelling Showpeople and boat dwellers. The Gloucestershire councils have recently completed a new assessment of the need for traveller sites in Gloucestershire and the results are set out below. Full details are available in the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.

Table showing the need for Travelling Showpeople plots.

Travelling Showpeople need					
Council area	2021 - 26	2026 - 31	2031 - 36	2023 - 41	Total
Cheltenham Borough	0	0	0	0	0
Gloucester City	14	4	5	5	28
Tewkesbury Borough	10	3	3	4	20
Total	24	8	8	9	48

Table showing the need for Gypsy/Travellers pitches.

Gypsy and Traveller need					
Council area	2021 - 26	2026 - 31	2031 - 36	2023 - 41	Total
Cheltenham Borough	6	1	1	1	9
Gloucester City	28	2	3	3	36
Tewkesbury Borough	29	21	22	24	96
Total	63	24	26	28	141

Table showing the need for Boat Dwellers.

Boat dwellers need					
	2021 - 26	2026 - 31	2031 - 36	2023 - 41	Total
Gloucestershire	50	1	1	1	53

- 5.22 There is also the need to consider the needs of traveller communities travelling through the area, that need somewhere to stop overnight or perhaps for a few days. These could be formal 'transit' sites, or more informal approaches where suitable land is identified.
- 5.23 At this stage we are considering how we can meet the needs of the traveller community. Between 22nd August and 6th October 2023, a 'call for sites' was held by councils across Gloucestershire. This is where any person or organisation can submit a site, which will then be assessed to see if it is suitable and could be delivered for the community. As part of this process, the councils notified many public bodies and other organisations, and met directly with some, to encourage the submission of as many sites as possible.
- 5.24 In total, this process resulted in XX sites being submitted and these are currently being assessed. A background document, setting out the methodology, process and results is available to download from the SLP website.
- 5.25 This isn't the end of the process. The councils are always happy to receive any sites for further consideration outside a formal 'call for sites', including through this consultation. Detail of how to submit a site is provided on the SLP website, or feel free to get in touch with one of the councils to discuss further.
- 5.26 The 'call for sites' has resulted in sufficient sites being submitted to meet the needs for permanent moorings for the boat dweller community. However, for other traveller communities there is still a need for more sites. We therefore need to think about other opportunities that could be available.
- 5.27 At the time of writing, we are considering whether certain existing sites could be used more effectively i.e. can more pitches or plots be accommodated on them. Another option is to require pitches and plots as part of large (strategic) allocations in the SLP, as part of a wider mix of development, including bricks and mortar housing, offices and industrial buildings. This has been used successfully elsewhere in the country.
- 5.28 We would like to explore through this consultation your views on these options and whether there are any other options to delivering for the traveller community that should be considered.
- 5.29 In identifying sites for the traveller community in the SLP, we need to make sure they meet the needs of the different communities and are in the right location. We'd like to explore this further through this consultation.

Questions

- 15. Should sites for traveller communities be provided as part of large developments for housing and/or employment?**
- 16. Are there any other ways that sites for traveller communities could be met in our area?**
- 17. What site characteristics and locations would be most suitable for different traveller communities?**

Jobs and the economy

- 5.30 One of the roles of the SLP will be to establish the right level of employment growth and ensure that the right type of employment land is provided in the right sorts of locations for business wishing to invest, expand and adapt.
- 5.31 The need for 'employment land' includes offices, industrial estates, warehousing and distribution. Unlike the need for new homes, the Government doesn't give councils a starting point. To explore the existing state of the economy of the area and how it may grow in the future, the councils in Gloucestershire worked together on a 'Gloucestershire Economic Needs Assessment' (DLP Planning, August 2020), which provided a high-level assessment of the Gloucestershire economy. The Gloucestershire Economic Needs Assessment looked at different economic forecasts and provided an indicative range of employment needs for different types of employment.

Table showing Employment Land Needs by Local Authority, 2021-2041

	Use Class B1a/b* (Offices and Research and development)		Use Class B1c (Light industry) / B2 (general industry) / B8 (Storage and Distribution) *	
Source	Labour Supply Growth (hectares)	Labour Demand Growth 1 (hectares)	Labour Supply Growth (hectares)	Labour Demand Growth 1 (hectares)
Cheltenham	22.9	26.2	15.4	17.6
Gloucester	31.1	33.7	19.2	19.9
Tewkesbury	20.7	23.0	63.1	75.5
JCS Area (Cheltenham, Gloucester and Tewkesbury)	74.7	82.9	97.7	113.0

*All buildings fall under a Planning Use Class. As there have been changes to the different types of Use Classes, this will need to be considered through any new evidence.

- 5.32 The labour demand scenarios consider the level of land needed to support the level of employment growth, which is based on different job forecasts in different sectors. The labour supply scenarios are based on population growth. This is historically used to estimate the level of employment land needed.
- 5.33 It is acknowledged that the evidence in the Gloucestershire Economic Needs Assessment was prepared at a time when the implications of Brexit and Covid-19 were not fully known, and therefore the intention is that this evidence will be reviewed to inform subsequent stages of the SLP. There will also be a need to take account of changing working practices, particularly since Covid-19 with a greater move towards home working or hybrid working as well as changes in logistics associated with increased on-line shopping, whilst recognising that there will still be a need for business premises of the right quality in the right locations.

Any evidence will need to take account of ‘market signals’, which includes what changes in skills are likely to be needed; how many people will be there to take up jobs; does the existing employment land that is available meet the needs of existing businesses or people looking to set up businesses in the area.

- 5.34 It will also be important to ensure that rural communities are also able to capitalise on the potential for economic growth. Whilst agriculture remains important, the rural economy is increasingly diversifying. Tourism and recreation have grown strongly, particularly in response to the Covid pandemic. Equally, however, the composition of urban and rural economies has become more closely aligned over time and there may be opportunities for sectors such as manufacturing, technological, creative and other commercial employment in the countryside.
- 5.35 The emerging Gloucestershire Economic Strategy being produced by Gloucestershire County Council and the GFirst Local Enterprise Partnership (LEP) is due for approval in early 2024. The Strategy will include an updated long-term vision for the county that will focus on creating improved employment opportunities within the context of achieving the county’s climate change commitments as it transitions to a low carbon economy.
- 5.36 The emerging Strategy identifies four key propositions to support delivery of the vision.
1. Sustainable Growth which supports a strategic approach to planning and delivery of new housing and employment sites to ensure that new growth proposals are at a sufficient in scale to support carbon net-zero targets while ensuring that all supporting infrastructure is financially viable, so it is delivered in the right place and at the right time.
 2. Inward Investment which builds on supporting Gloucestershire’s reputation as a welcoming and supportive environment for businesses from the UK and abroad to invest, fostering innovation, creating jobs, and promoting prosperity across the county.
 3. Skills and Employment which seeks to ensure that every resident has the opportunity to grow their skills and make the most of job opportunities in a diverse and flourishing economy.
 4. Business Support which provides an offer to enable businesses of all sizes and types to innovate, create jobs, and positively contribute to the transition to a low carbon economy.
- 5.37 The SLP will help to deliver the vision in the emerging Economic Strategy, including green growth. Currently, the M5 corridor is a magnet for employment growth, as acknowledged in the Local Transport Plan. This is because businesses, their supply chains, workers and consumers collectively depend upon a good quality highway network to move goods, delivery services and travel to work and other service facilities. However, the Local Transport Plan also acknowledges that the M5 motorway junctions are subject to significant demand which result in congestion, delay and at times safety concerns as a result of mainline queuing. It therefore concludes that the continued functioning of the M5 as a reliable and fast link providing regional connectivity can only be ensured with a transport strategy that will also see a significant shift in demand from the M5 to the Birmingham to Bristol rail link that runs in parallel to the M5. The same is true for the City Region’s east-west connectivity provided by the A40 which is also paralleled by a rail line.
- 5.38 There will be various exciting developments taking shape over the coming years, including the National Innovation Centre in Cheltenham capitalising on the presence of GCHQ

(Government Communications Headquarters), as part of the Golden Valley development. Cheltenham has recently been recognised as an innovation hotspot (Centre for Cities, September 2023, Innovation hotspots, Clustering the New Economy), which is essentially where firms cluster together in terms of sharing infrastructure and access to workers. The SLP will need to consider how best to facilitate the environment for businesses, positioning our city, town and other centres in a way that embraces growth, flexibility, change and innovation.

- 5.39 In Gloucester City, longstanding regeneration opportunities are coming to fruition with the development of the Forum, which will provide a new digital and technology campus with space for approximately 1,000 jobs, 131-bedroom hotel, new homes, leisure and retail. The University of Gloucestershire are also developing a new city centre campus which will provide teaching facilities for 4,500 students.
- 5.40 Tewkesbury Borough is an established investment location with a diverse range of economic sectors including advanced manufacturing and engineering, construction, transport, technology, financial services and creative industries. Tourism is also a particularly important industry.

Questions

- 18. What economic and regeneration needs should the Strategic and Local Plan address in supporting businesses to invest, expand and adapt?**
- 19. How should the Strategic and Local Plan best seek to accommodate employment needs and provide an environment that is attractive to inward investment?**
- 20. How should the Strategic and Local Plan support and encourage rural employment?**

Retail and town centres

- 5.41 Our city and town centres, as well as smaller village, farm, and neighbourhood shops, are really important. In addition to providing local access to shops, services and facilities, they often form the focus within communities, providing the opportunity for interaction between people, and a source of local employment.
- 5.42 Within our area, there are a wide range of different retail centres that perform different but equally important roles. Within the JCS, there is a hierarchy of city and town centres. This identifies Cheltenham Town Centre and Gloucester City Centre as main centres that offer a wide range of different things, and that have a wide catchment area, acting as sub-regional centres, with people living in areas such as the Forest of Dean, the Cotswolds, Tewkesbury Borough and Stroud Borough using them on a regular basis for shopping, leisure and services.
- 5.43 There are many smaller town centres that provide an important role in supporting the needs of local people and a wide rural area, i.e., Tewkesbury, Winchcombe and Bishops Cleeve.

These tend to offer limited range of food stores, clothing and essential services such as a post office.

- 5.44 Below this, there are smaller centres still that have a much more community/neighbourhood focus, referred to as either 'local centres', district centres', or 'neighbourhood centres'. These tend to provide a small number of shops, services and facilities that meet people's day-to-day needs, usually including a food shop plus maybe a post office, takeaways, pub and community hall.
- 5.45 Over the past few years, most centres have undergone significant change and challenge. The way people shop and use city and town centres has shifted away from shopping, which had always been the main reason to. People now look for shopping experiences and good quality and varied hospitality. Increasingly, people shop online or use retail parks.
- 5.46 There is now a need to rethink the role of our city and town centres and establish a long-term strategy that allows them to be flexible, adapt, evolve and thrive. Given their historic nature we need a strategy that enables flexible adaptation, while being respectful of conservation.
- 5.47 To help the councils consider how best to plan for our city, town and village centres, independent consultants prepared a Retail Study. It assessed the 'health' of centres at a point in time and considers strategy and policy options to ensure they remain important and respond to the needs of the community and visitors. Alongside this, an assessment looked at future economic forecasts to understand if it's likely to be necessary to plan for more retail units over the lifetime of the plan.
- 5.48 For the main three city and town centres in our area, the 'health check' is summarised below; however, in responding to the questions, we invite comments on any centre in the area. It is important to note that this assessment was completed in 2019 and since then changes will have occurred. It is likely the assessment will be updated through the preparation of the SLP.

Gloucester City Centre

- a) Factors such as a reduction in 'turnover' and an increase in vacancies suggest a city centre that is vulnerable and at risk from increased competition elsewhere (for example out of centre retail parks). Proposals for retail development outside of the traditional city centre should be carefully assessed.
- b) The delivery of Kings Quarter regeneration / the Forum, refurbishment/redevelopment of Kings Walk Shopping Centre, and redevelopment of the former Debenhams building for a University of Gloucestershire campus are all important in improving the quality of offer and bringing more people into the city centre.
- c) The quality and choice of shops was considered good, but with a need for better quality retail units. Planning strategy and policies should support refurbishment, redevelopment and reconfiguration of existing shops and units, and focus on a smaller area.
- d) Policies should seek complementarity between the traditional city centre and the Docks/Gloucester Quays.

- e) Since the study was completed Gloucester City Council has been proactive in working with stakeholders and partners in driving forward regeneration and has recently adopted a new City Centre Vision, which is now moving to the delivery stage.

Cheltenham Town Centre

- a) Cheltenham has the strongest town centre in the area, with the highest number of shops and services (and higher than the national average). When last assessed, vacancies were low.
- b) Since then, Cheltenham Borough Council has been proactive in putting a vacant units action plan in place and is working alongside the Cheltenham BID, landlords and agents to have collective responsibility to drive change.
- c) There is a small need for food shopping to provide for the need of the community over the period of the plan and this should be directed to the town centre which lacks a decent sized food store.

Tewkesbury Town Centre

- a) Plays an important role for residents of the town, the wider rural area and tourists. The mix of shops, services and facilities is broadly comparable to other similar towns, but with a growing number of vacancies at the time the study was undertaken.
- b) The key future challenge for Tewkesbury will be to create and maintain its own distinctive role and for it to adapt and meet the needs of the local community and visitors.
- c) Healings Mill and Spring Gardens offer opportunities to improve the offer of the town.

5.49 In terms of future needs, the assessment concludes that there is very little need to plan for additional retail up to 2041. In fact, there is forecast to be an oversupply in some areas. The exceptions are a small amount of need for food shops in Cheltenham and Bishops Cleeve, and small-scale provision to support new communities at larger developments through local / neighbourhood shopping centres.

5.50 Outside of the main city and town centres, village and farm shops, community facilities, such as village halls and public houses and local services are essential to support communities in meeting every day needs. There is a role for planning policies to protect these important community facilities and support their diversification.

Questions

- 21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?**
- 22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?**

Infrastructure

5.51 The NPPF as well as Planning Practice Guidance sets out that Plans should set out the policy requirements for the contributions expected from different types of development and where necessary, from different sites. In particular, this should set out the policy

requirements for the level and types of affordable housing and for supporting infrastructure, including (but not limited to) education, transport, health, green and blue infrastructure, and digital infrastructure. Policies of the Plan should also seek to ensure the timely provision of the infrastructure required to support the level of development proposed.

- 5.52 There are a number of key issues that are affecting the delivery of sites and their associated infrastructure. The delivery of greenfield sites may raise viability issues due to the need for new infrastructure to develop sites, or environmental constraints such as flood risk which will need to be mitigated. However, brownfield (sometimes described as Previously Developed Land) sites may pose their own viability challenges.
- 5.53 Further evidence will be produced to help better understand these viability issues and deliver the infrastructure needed to support sites. There will be a need to balance the delivery of physical infrastructure against the requirements of other policy considerations such as the delivery of affordable housing and green infrastructure. The timing of infrastructure delivery in association with new development will need to be carefully considered and identifying funding for infrastructure will be critical. An Infrastructure Delivery Plan (IDP), which identifies the types of infrastructure needed as well as costings, will be produced alongside the SLP, as will an assessment to ensure it is affordable (called a Viability Assessment).
- 5.54 New homes and employment will need to be supported by new infrastructure for example, schools, roads, public transport, health services, and recreation provision. This will need to be funded through central and local government funding streams and contributions from developers.
- 5.55 In some cases, it may be necessary to safeguard routes for longer term infrastructure projects. Safeguarded is a technical term for an established part of the planning system that aims to protect infrastructure projects, such as public transport, highways or other infrastructure such as pipelines, from conflicting developments. Safeguarded areas include land that will need to be identified as being likely to be needed for such projects.

Questions

- 23. What types of infrastructure do you consider are most critical to be delivered alongside new development?**
- 24. Given their size, if strategic scale new settlements were to form a part of the Strategic and Local Plan, what accompanying infrastructure would be necessary?**
- 25. What key services and facilities do you consider most important in deciding if a rural settlement is a suitable location for new homes and other forms of development?**
- 26. Should the Strategic and Local Plan safeguard sites or routes for longer term infrastructure projects?**

6. Planning for sustainable development

6.1 The SLP is required to plan positively for the development needs of the area, including new homes, employment, commercial uses and for traveller communities. At this early stage in the process the councils have various sources of evidence to draw on as a starting point. This evidence will be updated, and new evidence produced to support the Plan, such as updated flood risk assessments. The councils also need to consider whether there are any alternatives approaches that should be considered.

6.2 Through this consultation the councils are considering different approaches to how development needs could be delivered in a way that meets the draft Vision and Strategic Objectives.

The Existing Strategy

6.3 The existing approach to delivering growth is set out in the adopted JCS. It guides the location of new development based on a 'settlement hierarchy'. The key urban areas of Cheltenham and Gloucester are identified as the focus for new development where housing and employment needs can be provided close to where they are needed and where occupiers of new development can benefit from the existing and enhanced sustainable transport network.

6.4 Given that there is only limited land for development within Cheltenham and Gloucester, the strategy also relied on urban extensions to their built-up areas, mostly on land within Tewkesbury Borough Council's area.

6.5 Tewkesbury town itself plays a lesser role for new housing and economic development due to its small size. In turn, a network of Rural Service Centres (Winchcombe and Bishop's Cleeve) and a number of smaller Service Villages provide for needs within the rural area.

6.6 In preparing the SLP, we need to consider afresh what the development strategy should be in the future, and whether it ought to continue to be based on the settlement hierarchy described above.

6.7 We have done this through the identification of six distinct scenarios, commonly known as 'spatial options'. They have been considered in isolation, the aim being to test the implications of each option and understand their 'pros' and 'cons'. To help with this, we have mapped all the site opportunities currently being promoted to the councils for development, to understand the geographical spread. This, along with our ongoing evidence review, engagement with stakeholders and the findings of this consultation will be used to build up a preferred approach, which will be introduced at the next stage of consultation.

6.8 None of these scenarios would, on their own, deliver sustainable development; the final strategy will be a combination of different elements.

6.9 It is essential to note that no policy or site allocations are being put forward at this stage of the plan-making process. Information contained in the accompanying evidence base includes Housing and Economic Land Availability Assessments (HELAA), which Government requires councils to produce. The HELAA is a broad preliminary assessment, including mapping, of the individual sites which have been submitted to the councils for consideration as development options. The various diagrams in this consultation document are taken from

the HELAA. They illustrate diagrammatically the various sites and locations that are currently being promoted to the councils, which would be associated with each of the six growth scenarios, as set out earlier. **It is important to note that the inclusion of land on any accompanying maps or diagrams does not mean that the land is suitable for development, or that the land is necessarily available for development, or even that it will be supported by any of the councils. Furthermore, any such maps or diagrams do not have any planning status. Any allocations of land will be made at a later stage of the SLP process.**

The scenarios

- 6.10 The six different development scenarios tested at this stage are:
1. Urban concentration
 2. Urban extensions
 3. Urban extensions, avoiding the Green Belt
 4. New strategic settlements
 5. Rural dispersal
 6. Sustainable transport
- 6.11 As a starting point for all the scenarios, we have included all currently known site opportunities in the urban areas (also known as 'baseline capacity'). Full details of this are available on the website. This is because it's important to ensure that all brownfield sites, and those in urban areas are identified in the first instance, before then considering other options, including those on undeveloped land (i.e., green field).
- 6.12 The section below summarises the main conclusions of the assessment, including the pros and cons.
- 6.13 Through this consultation, we would like your feedback on the different options, the assessments we have undertaken, and whether there are any other scenarios you think we should consider. This consultation is also a further opportunity for additional site opportunities to be submitted for the councils to consider. This includes all forms of development, including housing, employment/industrial, retail/ commercial, and that for traveller communities. Details of how to submit a site are available on the website.
- 6.14 It's also an opportunity for those who have already submitted a site to the councils to provide any new or updated information they may have to help the councils consider the opportunity fully.

Scenario 1 Urban concentration

- 6.15 This option would involve much more intense development than would traditionally be expected on urban sites in Gloucester and Cheltenham, particularly on previously developed land. This would include substantial increases in densities; higher buildings even in more sensitive areas such as Conservation Areas; conversions or rebuilding of retail or other town centre properties into housing or mixed-use schemes.
- 6.16 This differs from the baseline position. This means that the number of homes that could fit on the land would be pushed as high as possible.

Insert diagram

Pros	Cons
<ul style="list-style-type: none"> • More people living in and using shops, services and facilities in the main city and town centres. • Bringing more life and vitality to the city and town centres, including at night. • Concentrated development in urban areas, supporting use of bus and rail, walking, cycling and car clubs. • Supports maximum use of 'previously developed land' and urban regeneration. • Protects the existing Green Belt and minimises the loss of greenfield sites and higher quality agricultural land. 	<ul style="list-style-type: none"> • On its own, along with baseline capacity, would not deliver sufficient new homes and jobs. • Would only provide for a limited range of housing types, sizes and tenures (based on higher density schemes). • Could lead to loss of some existing employment and commercial space to housing. • Increased journey lengths as housing and economic growth diverted to alternative locations outside of the SLP area. • Likely harm to the setting and significance of important heritage assets and character of the urban area. • Limited opportunity to deliver climate change mitigation measures, strategic and community infrastructure. • Potential strain on existing social and community infrastructure, such as schools and health facilities.

Scenario 2: Urban extensions

- 6.17 This option would mean seeking to deliver development as urban extensions to the key urban areas of Cheltenham and Gloucester and could include sites which fall within the designated Green Belt. The development strategy of the JCS focused on such extensions as a means of meeting some of the housing needs of Gloucester and Cheltenham. In addition, several areas of land were removed from the Green Belt and “safeguarded” for longer term development needs.
- 6.18 Urban extensions may be one of the most effective ways of supporting high quality public transport infrastructure such as the Mass Rapid Transit scheme proposed in Gloucestershire County Council’s Local Transport Plan.
- 6.19 Nevertheless, it will need to be demonstrated through the SLP if new urban extensions, including the previously ‘safeguarded’ sites, should form part of the preferred development strategy for our area.
- 6.20 As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.

Insert diagram.

Pros	Cons
<ul style="list-style-type: none"> • Likely range of available sites may enable housing and economic needs to be met in full. • Development can be delivered close to where the need arises, reducing the likelihood of unnecessary travel into and out of the area. • Provides the opportunity for a wide range of housing types, sizes, and tenures to meet local need. • Urban extensions to existing urban areas would increase the catchment population to shops, services and facilities in city and town centres, access to employment opportunities, and existing/improved public transport, walking, and cycling (depending on location). • Would provide opportunity to be supported by high quality public transport infrastructure such as Mass Rapid Transit. • Opportunity to enable sites to be comprehensively planned to incorporate social, economic and environmental infrastructure, e.g. everyday shops and services and open spaces. 	<ul style="list-style-type: none"> • Loss of some Green Belt land and potentially reducing the gap between Gloucester, Cheltenham, and Bishops Cleeve. • Loss of greenfield land. • Potential loss of higher quality agricultural land for food production.

Scenario 3: Urban extensions, avoiding the Green Belt

- 6.21 This option means seeking to deliver development as urban extensions to the main settlements in the area but avoiding the Green Belt. This scenario has been identified because the government attaches great importance to Green Belt and the NPPF makes clear that its boundaries should only be altered where exceptional circumstances to do so are fully evidenced and justified through a Local Plan. For this reason, the role of the Green Belt in planning for long-term growth is subject of much national debate.
- 6.22 Given the existing Green Belt is concentrated around Gloucester and Cheltenham, and between Cheltenham and Bishops Cleeve, it is appropriate to explore, as part of this consultation, the merits and consequences of a strategy which would support urban extensions to the main urban areas but excluding designated Green Belt land.
- 6.23 The inclusion of this scenario is not to say that Green Belt considerations are of any greater significance than protected areas such as the Area of Outstanding Natural Beauty, or Sites of Special Scientific Interest. However, such designations have statutory protection whereas Green Belt land is, as a matter of national policy, designated as a means of managing urban growth, rather than providing environmental protection. This scenario would include land which was previously removed from the Green Belt in the JCS and 'safeguarded' to meet longer term needs.
- 6.24 As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.

Insert diagram

Pros	Cons
<ul style="list-style-type: none"> • Protects the existing Green Belt, limits the loss of green field sites and higher quality agricultural land. • Some benefits from an increased catchment population to shops, services and facilities in city and town centres, access to employment opportunities, and existing/improved public transport, walking and cycling, due to constraint on development and less sustainable locations. • Would provide opportunity to be supported by high quality public transport infrastructure such as Mass Rapid Transit. • Some opportunity to enable sites to be comprehensively planned to incorporate social, economic and environmental infrastructure, e.g. everyday shops and services and open spaces 	<ul style="list-style-type: none"> • On its own, along with baseline capacity, would not deliver sufficient new homes and jobs. Would only provide for a limited range of housing types, sizes and tenures (based on higher density schemes). • Increased journey lengths as housing and economic growth diverted to alternative locations outside of the SLP area. • Loss of greenfield land • Potential loss of higher quality agricultural land for food production.

Scenario 4: New strategic settlement

- 6.25 This option means seeking to deliver development through one or more comprehensive, master-planned new settlements, of a minimum of around 4,000 new homes with supporting infrastructure. Currently, three such potential locations have been identified based on information submitted on behalf of landowners/promoters. The locations are around Boddington on land to the south of the A4109 between the A38 and M5 corridors. A further potential option is presented straddling the boundary of Tewkesbury Borough and the Forest of Dean between Churcham and Highnam in the south west of the SLP area. The third option lies to the east of the M5 at Ashchurch on the edge of the built-up area of Tewkesbury.
- 6.26 The latter option – the Tewkesbury Garden Town – was awarded Garden Town status by the Government in 2019. In this context, Tewkesbury Borough Council is currently establishing a programme to work with local people and landowners/developers to plan for a large sustainable new settlement consisting of a wide mix of homes together with the supporting infrastructure required such as schools, health, transport, green infrastructure and other community facilities. Gloucestershire County Council and National Highways are also, as the relevant local highway authorities, drawing up detailed proposals for major improvements to Junction 9 (M5). This would both address existing recognised pressures on the strategic road network as well as potentially provide the additional road capacity necessary to support the development of the proposed Garden Town. The overall planning merits of the proposed Tewkesbury Garden Town will be assessed formally through this SLP process alongside other development options being promoted by others as part of the overall development strategy for the Cheltenham – Tewkesbury – Gloucester area.
- 6.27 As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.

Insert diagram

Pros	Con
<ul style="list-style-type: none"> • Dependent on location, could reduce the need to build on the designated Green Belt (except at Boddington). • Would concentrate development in the rural area whereas otherwise would be a larger number of scattered sites. • Would enable provision of a wide choice of housing sizes, types and tenures, and a choice of types of employment space. • Once delivery is underway, could provide greater certainty over long-term supply of housing. • Opportunity to enable sites to be comprehensively planned to incorporate social, economic and environmental infrastructure, e.g., 	<ul style="list-style-type: none"> • Would result in the loss of greenfield land. • Could potentially lead to loss of higher quality agricultural land. • Unlikely to provide for all of the new homes and jobs needed resulting in worsening housing unaffordability and constrained economic growth. • May not provide homes and jobs where they may be needed close to urban and rural settlements. • Would require longer lead-in times before homes and employment spaces are built given the amount of work needed to prepare masterplans and co-ordinate the provision of transport and community infrastructure.

<p>everyday shops and services and open spaces.</p> <ul style="list-style-type: none"> • Could enable provision of accessible local/district centres and everyday facilities and services such as schools, libraries and health facilities; provide extensive climate change mitigation measures; on-site biodiversity net gain; green spaces; flood water management; allotments; large scale renewable energy and community buildings. • Dependent upon location, could provide or enhance bus/rail services, support car clubs, and promote active travel by walking and cycling. 	<ul style="list-style-type: none"> • Dependent on location, may not support the vitality and viability of larger city and town centres. • Investment in rural shops, services and facilities would not be supported.
--	--

DRAFT

Scenario 5: Rural dispersal

- 6.28 This option means distributing growth widely across the rural area by encouraging development at many existing settlements and potentially other rural locations (such as redundant industrial sites or farm complexes). This would mean the smallest of hamlets and villages could contribute to meeting overall development needs, even where they are not currently recognised in the JCS settlement hierarchy as Rural Service Centres or Service Villages.
- 6.29 As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.

Insert diagram

Pros	Cons
<ul style="list-style-type: none"> • Could support the re-use of redundant rural sites and buildings. • Would be likely to safeguard the Green Belt. • Could provide significant potential for supporting thriving and vital rural communities by supporting shops, services and facilities, and rural employment. • Would provide many choices for people to live and work in the countryside where they may have family or employment ties. • Would make significant contribution to providing affordable housing in rural areas. 	<ul style="list-style-type: none"> • Would likely harm the character and setting of existing settlements and surrounding countryside. • Unlikely to provide for the full amount of new homes and jobs needed, resulting in worsening housing affordability, and constrained economic growth. • Increased journey lengths likely as housing and economic growth diverted to alternative locations outside of the SLP area. • May not provide for a full range of housing sizes, types and tenures as a result of dispersing development thinly. • May not provide a suitable range of locations and types of employment space. • Unlikely to enable sites to be comprehensively planned to incorporate social, economic and environmental infrastructure, e.g. everyday shops and services and open spaces. • Unlikely to support existing or new public transport, leading to greater dependency on the private car and road congestion, particularly for travel to larger built-up areas. • Could lead to conflict between new homes, jobs and agriculture as a result of rural densification. • Would potentially add to pressure on existing rural services, facilities and other community infrastructure.

Scenario 6: Sustainable transport scenario

- 6.30 This option means delivering development in locations along existing and potential high frequency public transport, walking and cycling routes. It draws on the broad objectives of Gloucestershire County Council as the body responsible for managing road and public transport networks. The Local Transport Plan in particular, promotes sustainable travel. Development under this scenario would need to be integrated in, or linked to, the Gloucestershire cycle spine and the proposed Gloucestershire Mass Rapid Transport system, which is a longer-term aspiration. Furthermore, all the local authorities in Gloucestershire have agreed a Statement of Shared Intent to in principle to reduce carbon emissions from transport in line with science-based targets to achieve net zero ambitions by 2050.
- 6.31 Adopting a sustainable transport strategy as part of the SLP would therefore mean prioritising new sites for housing and economic development in locations which would maximise people's choice to travel by means other than the car to access services, facilities and jobs. This would also tend to reduce the need to travel at all and would help reduce carbon emissions.
- 6.32 As with all options, this includes the urban capacity within Gloucester and Cheltenham as a starting point.

Insert diagram

Pros	Cons
<ul style="list-style-type: none"> • A pattern of growth which would provide optimum accessibility by sustainable transport and active travel, making a significant contribution to creating a more sustainable Gloucestershire and mitigating the effects of climate change. • Development close to main existing settlements would provide opportunities for accessing larger shops, services and facilities and jobs by connecting with existing and enhanced sustainable transport networks and the opportunity for active travel. • Would enable a significant proportion of, or all, housing and employment needs to be met close to where they arise, reducing the likelihood of unnecessary travel into and out of the JSP area. • Could provide a wide range of housing sizes, types and tenures; and a choice of employment space. • Strategic scale development in locations along mass transit routes 	<ul style="list-style-type: none"> • Would result in the loss of designated Green Belt between Cheltenham, Gloucester and Bishops Cleeve, green field sites and potentially higher quality agricultural land available for food production. • Could result in the coalescence of Cheltenham and Gloucester in particular. • Growth of Gloucestershire Airport could be a constraint on development between Cheltenham and Gloucester; and conversely limit options for future growth at the airport. • Could divert growth and investment, including transport infrastructure, away from the rural area. • Would not generally meet the needs of the rural economy or provide development in locations served by strategic road infrastructure.

<p>would support the vitality and viability of city and town centres and enable clusters of employment growth close to large built-up areas.</p> <ul style="list-style-type: none"> • Would support the development of brownfield sites within and adjoining large settlements. • Opportunity to enable sites to be comprehensively planned to incorporate social, economic and environmental infrastructure, e.g. everyday shops and services and open spaces. 	
---	--

Questions

27. Are there any additional development scenarios that should be considered?
 - a. If yes, please describe what they are.
28. Are the pros and cons identified for the six development scenarios a fair and accurate assessment?
 - a. If not, which one(s) and what are your reasons?
29. Which of the development scenarios, or combination of them, do you consider the most appropriate for the Strategic and Local Plan?
30. Are there any places not currently identified in the rural settlement hierarchy, which could/should be included?

7. Conclusions and next steps

- 7.1 This consultation is the first step in the preparation of the SLP and is intended to ask a broad range of questions to help understand what the Plan should cover. The feedback provided through this consultation will be reviewed and used to shape the draft plan.
- 7.2 However, this consultation is an opportunity for stakeholders and the community to express any other issues, concerns or opportunities that do not easily fit within any of the key questions set in this consultation document.

Questions

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

- 7.3 The next full consultation is programmed for early 2025. This is intended to be a draft plan, which will include a preferred strategy, proposed site allocations and draft policies.

TEWKESBURY BOROUGH COUNCIL

Report to:	Executive
Date of Meeting:	9 November 2023
Subject:	Tewkesbury Interim Housing Position Statement
Report of:	Interim Planning Policy Manager
Head of Service/Director:	Associate Director: Planning
Lead Member:	Lead Member for Built Environment
Number of Appendices:	1

Executive Summary:

The Borough Council is currently unable to demonstrate a five-year housing land supply as required by the National Planning Policy Framework. Consequently, a presumption in favour of granting planning permissions involving the provision of housing (with certain exceptions) is engaged. This is commonly referred to as the ‘tilted balance’. Nevertheless, adopted Development Plan policies in Tewkesbury Borough remain the starting point for decision-making. The proposed Interim Housing Position Statement would provide informal guidance in clarifying the Council’s approach to decision-making for applicants and the community. Specifically, the document would outline the types of locations and housing schemes which are most likely to be considered acceptable in redressing the five-year housing supply shortfall; and also to set out other actions that the local planning authority and others can take in expediting suitable housing proposals. Although no public consultation is necessary, a briefing for Town and Parish Councils has been arranged, and a summary of any views expressed will be given to Council.

Recommendation:

To RECOMMEND TO COUNCIL:

1. That the Interim Housing Position Statement be approved and published to explain the Council’s approach to decision-making on planning applications involving the provision of housing.
2. That authority be delegated to the Associate Director: Planning, in consultation with the Lead Member for Built Environment, to make any necessary minor amendments and corrections to the document prior to publication.

Financial Implications:

There are no direct financial implications resulting from this report.

Legal Implications:

Pursuant to section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 decisions on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework (NPPF) represents government planning policy and is a material consideration that must be taken into account, but does not change the statutory status of the development plan as the starting point for decision making.

The National Planning Policy Guidance states that if decision takers choose not to follow the National Planning Policy Framework, where it is a material consideration, clear and convincing reasons for doing so are needed.

NPPF includes at paragraph 11 a presumption in favour of development and this provides pursuant to paragraph 11(d) that where a local planning authority cannot demonstrate a five year supply of deliverable housing permission is to be granted unless:

- i) the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

A Footnote to 11(d)(i) sets out a closed list of the policies as being referred there as those in the NPPF (rather than those in development plans) relating to particular matters which include habitats sites, Green Belt, Areas of Outstanding Natural Beauty, irreplaceable habitats, designated heritage assets and areas at risk of flooding. Therefore, in each case where such policies are relevant to a proposal they will need to be considered as to whether they indicate there being a clear reason for refusal.

Further the NPPF at paragraph 14 provides that where particular criteria applies, it is to be taken that the adverse impact of allowing development involving the provision of housing that conflicts with a neighbourhood development plan is likely to significantly and demonstrably outweigh the benefits.

The Interim Housing Position Statement will not be a policy document and will not be able to pre-empt any determination of planning applications, but seeks to set out proactive approach in providing informal guidance as regards the exercises to be undertaken in the determination of planning applications whilst the Council cannot demonstrate a five year policy.

Environmental and Sustainability Implications:

The Interim Housing Position Statement would assist in operating the presumption in favour of granting sustainable housing development proposals in a manner which best safeguards environmental and sustainability interests.

Resource Implications (including impact on equalities):

None directly arising from this report.

Safeguarding Implications:

None

Impact on the Customer:

The Interim Housing Position Statement is intended to be a helpful document clarifying for both applicants and the community, the local planning authority's approach to decision-making on planning applications for housing.

1.0 INTRODUCTION

- 1.1** Members will know that the National Planning Policy Framework (NPPF) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.
- 1.2** Tewkesbury Borough Council recently published its annual Five-Year Housing Land Supply Statement for the monitoring period 1 April 2023 – 31 March 2028¹. This confirmed that, as at 31 March 2023, it could demonstrate 3.24 years' supply (including a 5% buffer).
- 1.3** As a consequence of the shortfall, the NPPF introduces a presumption that planning permissions for development involving the provision of housing should be granted (except where there are clear reasons for refusal to protect certain areas or assets of particular importance). This 'presumption' is commonly referred to as the 'tilted balance' in deciding planning applications.
- 1.4** The NPPF does not require local planning authorities to undertake any specific measures such as preparing an action plan in response to a shortfall in five year housing land supply. Nonetheless, it is essential that the Council restores a satisfactory housing supply position as quickly as possible. Accordingly, an Interim Housing Position Statement (IHPS) has been prepared to set out informal guidance on how this can be most effectively achieved.

2.0 PURPOSE OF THE INTERIM HOUSING POSITION STATEMENT

- 2.1** The purposes of the IHPS are principally to acknowledge the significant shortfall in housing land supply in Tewkesbury Borough and explain what actions the Council will take in ensuring this is redressed. The IHPS is essentially a statement of intent designed to inform both applicants and communities in setting out:
- the sorts of locations and types of housing proposal which are likely to accrue most weight in operating the tilted balance; and
 - the actions the Council will take, or encourage others to take, as part of its development management process.
- 2.2** It should be noted that the triggering of the tilted balance does not alter the statutory basis for deciding proposals for housing. Planning law requires all applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In this context, the Development Plan for Tewkesbury Borough comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (the JCS), the Tewkesbury Borough Plan 2011 - 2031 and the 'made' Neighbourhood Plans throughout the Borough.
- 2.3** However, where it is concluded that an individual proposal for housing does not accord with the Development Plan as a whole, the local planning authority is required to go on to assess whether there are any material considerations that indicate that the proposal should be granted. The NPPF is a material consideration and provides that in cases where a five year supply of deliverable housing cannot be demonstrated that (subject to certain exemptions) permission is to be granted unless any adverse effects of doing so would "significantly and demonstrably" outweigh the benefits when assessed against the policies in the NPPF taken as a whole. As such, the NPPF's tilted balance will be a material consideration to be taken into account (along with any other material considerations relevant to the case) in deciding whether or not to grant planning permission.

¹ [TBC-Five-Year-Supply-Statement-Oct-2023-FINAL.pdf \(tewkesbury.gov.uk\)](#)

- 2.4** In this context, and as noted above, the IHPS would provide informal guidance on the circumstances in which the benefits of housing are likely to carry most weight in operating the tilted balance; and hence where the benefits are less likely to be outweighed by adverse impacts of development.
- 2.5** In summary, such circumstances might include where sites are of a size, type and location where housing would be 'deliverable' and provide housing without delay. It may also include cases where the development would represent sustainable development by providing good quality housing in the right locations having regard to the Development Plan and the NPPF. Amongst other considerations, this could consist of appropriately designed schemes which relate well to existing settlements, facilitate sustainable travel, involve a suitable size, mix and type of dwellings, respect landscape character and avoid environmental harm.
- 2.6** In this way, it is considered the IHPS would assist in supporting genuinely sustainable development and ensure a consistent approach to decision-making under the tilted balance.
- 2.7** The draft IHPS also proposes a number of actions which, where appropriate, could expedite the development management and development processes. These include encouraging early engagement between applicants and communities, imposing non-standard planning conditions requiring earlier commencement of development and streamlining s106 and validation procedures.

3.0 CONSULTATION

- 3.1** The draft IHPS is intended to serve as informal guidance relating to existing planning policy, and public consultation is not therefore necessary. A briefing for Town and Parish Councils has been arranged, and a summary of any views expressed will be given to Council.

4.0 ASSOCIATED RISKS

- 4.1** Failing to approach decision-making in an effective and consistent way would be likely to perpetuate a shortfall in housing land supply. This would lead to a prolonged period of uncertainty with more housing proposals being decided at appeal, the attendant costs and risks of seeing housing development granted contrary to adopted local planning policies.

5.0 MONITORING

- 5.1** It is proposed that the IHPS be subject to periodic monitoring at least annually, in order to assess its effectiveness and inform any necessary review.

6.0 RELEVANT COUNCIL PLAN PRIORITIES/COUNCIL POLICIES/STRATEGIES

- 6.1**
- Council Plan – all priorities and objectives relating to sustainable development and place.
 - Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031
 - Tewkesbury Borough Plan 2011 - 2031
 - 'Made' Neighbourhood Plans throughout the Borough.

Background Papers: None

Contact Officer: Interim Planning Policy Manager
lan.bowen@tewkesbury.gov.uk

Appendices: Appendix 1. Draft Interim Housing Position Statement

Tewkesbury Borough Council
Draft Interim Housing Position Statement
November 2023

DRAFT



Table of Contents

- 1. Summary, Background and Purpose of this Interim Housing Position Statement..... 3
- 2. Local Planning Policy Context..... 4
- 3. Approach to decision making – Types and Location of Housing..... 5
- 4. Approach to decision-making - Development Management Procedures..... 7
- 5. Future Review of this Statement..... 8

DRAFT

1. Summary, Background and Purpose of this Interim Housing Position Statement

- 1.1. Tewkesbury Borough Council confirmed, in its latest Annual Five Year Housing Land Supply Statement (1st April 2023-based)¹, that it is not currently able to show a five years' worth of housing, as required by paragraph 74 of the National Planning Policy Framework (NPPF)².
- 1.2. The consequence of this is set out in paragraph 11 of the NPPF and described in more detail below. In summary, it means that (with certain exceptions) planning applications involving the provision of housing should be granted permission unless any adverse impacts of doing so would "significantly and demonstrably" outweigh the benefits. This approach is commonly referred to as the "tilted balance".
- 1.3. This does not mean that local planning policies are irrelevant. They remain the statutory starting point for assessing the merits of individual planning applications. All development, whether approved under the tilted balance or otherwise, should provide "sustainable development". As such, all new housing should, for example, be of a high standard, accessible and of a scale and nature appropriate to its location. It should also be acceptable taking into account the amenity of occupiers of neighbouring properties and all other wider environmental, social and economic planning considerations. These are all matters assessed in accordance with relevant local planning policies and the NPPF.
- 1.4. Accordingly, in applying the tilted balance to proposals that conflict with the Development Plan as a whole, relevant local planning policies (including in 'made' neighbourhood plans) will be used together with the NPPF as the basis to judge the degree to which any adverse impacts resulting from the development would outweigh the benefits.
- 1.5. Although no specific formal actions are required other than the application of the tilted balance, the Council recognises the pressing need to re-establish a satisfactory housing supply position. This Interim Housing Position Statement sets out the actions the Council will take in seeking to address this need.

This Interim Housing Position Statement is not planning policy. Instead, it acknowledges the current housing land supply shortfall and is a statement of intent, for communities and applicants, setting out the actions the Council will take to support the provision of appropriate forms housing and restore a five year housing land supply. This includes:

1. Outlining the sort of locations and types of proposal for housing which are most likely to be viewed favourably in operating the tilted balance; and
2. Describing the actions the Council will take, or encourage others to take, as part of its development management process.

¹ [TBC-Five-Year-Supply-Statement-Oct-2023-FINAL.pdf \(tewkesbury.gov.uk\)](#)

² [National Planning Policy Framework \(publishing.service.gov.uk\)](#)

2. Local Planning Policy Context

- 2.1. The National Planning Policy Framework (NPPF) (September 2023) is a material consideration in making planning decisions. The NPPF makes it clear that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:
- Approving development proposals that accord with an up-to-date development plan without delay; or
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (which includes for applications involving the provision of housing where a local planning authority cannot demonstrate a five year supply of deliverable housing sites), granting permission unless:
 - The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
- 2.2. This does not alter the fact that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. In this context, the Development Plan for Tewkesbury Borough comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (the JCS)³, the Tewkesbury Borough Plan 2011 - 2031⁴ and the ‘made’ Neighbourhood Plans within the Borough.
- 2.3. Current made Neighbourhood Plans are as follows:
- [Alderton neighbourhood development plan](#)
 - [Churchdown and Innsworth neighbourhood plan](#)
 - [Down Hatherley, Norton and Twigworth neighbourhood development plan](#)
 - [Gotherington neighbourhood development plan](#)
 - [Highnam neighbourhood development plan](#)
 - [Twyning neighbourhood development plan](#)
 - [Winchcombe and Sudeley neighbourhood development plan](#)
 - [Aschurch Rural neighbourhood development plan](#)
 - [The Leigh neighbourhood development plan](#)
 - [Woodmancote neighbourhood plan](#)
- 2.4. The intention is for the Council to be able to guide development to appropriate and sustainable locations using this document to assist in the consideration and assessment of planning applications. It seeks to ensure that housing proposals submitted in advance of the emerging Local Plan⁵ are assessed in a consistent manner against national policy and guidance, with the aim of determining that the most appropriate development comes forward in the most suitable locations.

³ [Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031](#)

⁴ [Tewkesbury Borough Plan 2011 - 2031](#)

⁵ Emerging Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan

3. Approach to decision making – Types and Location of Housing

- 3.1. As noted above, with certain exceptions, the tilted balance will be applied where it has been concluded by the Local Planning Authority that an individual proposal does not accord as a whole with the Development Plan. In such cases, the NPPF requirement to assess whether any adverse effects significantly and demonstrably outweigh the benefits becomes a material consideration to apply before making a decision.
- 3.2. In general, applications will be more likely to be granted planning permission in the following circumstances:

... Where they are “deliverable”

- 3.3. An essential element in boosting housing land supply is to enable developments that are “deliverable”. The NPPF definition of a deliverable site is one which is available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.
- 3.4. Applications can demonstrate that proposed development is “deliverable” as part of the submitted documents. Deliverable sites will be those that are not, for example, dependent upon provision of significant off-site infrastructure which would prevent them from delivering completed dwellings within 5 years. Evidence of the site deliverability can also be demonstrated where all the land required to deliver the proposed housing is in the applicant’s control.
- 3.5. Applicants can also evidence that they intend to develop sites promptly following the grant of permission so that proposals will begin to be delivered within a short period and deliver housing (for example through the submission of a draft phasing plan).
- 3.6. Applications for full planning permission, rather than outline consent, are more likely to lead to the early delivery of housing. For larger schemes, hybrid applications (part full and part outline) may also demonstrate a greater commitment to delivery. In cases where outline planning applications are made, the submission of a parameter plan showing housing mix and layout would assist in providing greater certainty over how housing might be delivered in a timely manner.

... Where they represent good quality housing in the right locations

- 3.7. The adopted local planning policies define settlement boundaries to focus growth within the most sustainable settlements and protect the intrinsic character and beauty of the countryside. As the Council is unable to demonstrate a five year supply of deliverable housing sites and, pending the adoption of a new Strategic and Local Plan, it is acknowledged that the settlement boundaries in themselves will not determine whether housing development is acceptable. In these circumstances, good quality housing and appropriate locations are therefore likely to consist of:
1. Those which are suitably located in relation to existing sustainable settlements, with access to the facilities and services that are generally likely to be required by new residents by

suitable vehicular, pedestrian and cycling links, including new and upgraded routes. Current planning policies within the JCS Core Strategy and the Tewkesbury Borough Local Plan set out the settlement hierarchy which identify the most sustainable settlements and will inform consideration of any housing proposal.

2. Schemes where the scale of development proposed is appropriate having regard to the settlement's location in the hierarchy and the range of facilities which would make it a sustainable location.
 3. Development which would be of a high standard of design quality and accord with all of the urban design, architectural design and sustainable design principles identified in local and national policies and respecting the existing settlement pattern and characteristics.
 4. Proposals which consider the best and most efficient use of the land, whilst responding to the existing character and distinctiveness of the settlement and surrounding area; and schemes which avoid low density or piecemeal development, including the artificial subdivision of larger land parcels.
 5. Proposals which would not result in unacceptable harm to areas designated for their landscape or ecological value, or the character of the surrounding countryside. Applicants would be advised to have regard to the Council's most up to date landscape sensitivity study.
 6. Proposals which would not have an unacceptable impact on the highway safety, or severe residual impacts on the highway network, and would provide for safe and convenient pedestrian and cycle access to key community facilities and services within the settlement or nearby settlement.
 7. Development which would be located in areas at lowest risk of flooding.
 8. Proposals which avoid inappropriate development in the Green Belt which is, by definition, harmful.
 9. Proposals for development that would not be likely to result in the loss or deterioration of irreplaceable habitats such as ancient woodland and veteran trees.
 10. Proposals which would be deliverable and viable, having regard to the provision of necessary on-site infrastructure, including affordable housing, green infrastructure, biodiversity net gain and other requirements; and those which would not be dependent upon delivery of significant enabling off-site infrastructure that would hold back early delivery of housing contributing to the five year land supply.
 11. Proposals include provision of an appropriate mix of housing to meet local needs including affordable housing in line with Council policies and national guidance and local housing needs evidence, currently set out in the [Gloucestershire Local Housing Needs Assessment \(2020\)](#).
 12. Schemes which demonstrate high standards of sustainable construction to address carbon reduction and climate change. This could include evidence relating to water supply, efficiency and disposal in line with the Water Framework Directive.
- 3.8. The above points do not set out a comprehensive list of planning considerations or a full range of relevant national and local planning policy and practice that will be applied when assessing and determining planning applications for residential development. The final planning assessment and the balancing of all considerations will need to be applied in the decision-making process on a case-by-case basis. This IHPS should be read alongside all relevant local and national policy and guidance.

4. Approach to decision-making- Development Management Procedures

Planning applications for housing

- 4.1. Planning applications for housing which would be acceptable and likely to make an important contribution to housing land supply will be identified at an early stage in the application process, with a focus on achieving timely decisions.

Early Engagement

- 4.2. In bringing forward future applications the Council would encourage applicants to undertake early and meaningful engagement with the local community and relevant stakeholders regarding their proposals for development. In particular, the Council would encourage early and direct engagement with relevant town and parish councils with a view to understanding and where appropriate responding to their priorities prior to submission of a planning application.
- 4.3. Preapplication process – the Council would also proactively encourage the early submission of pre-application proposals seeking to flush out, at an early stage, the key issues for consideration and concerns relating to any application proposal. The Council will seek to do this in a collaborative way, accepting that the absence of any detailed input of key consultees may give rise to a “subject to” comment in any advice that is provided.
- 4.4. Planning Performance Agreements (PPAs) – the Council has experience of delivering development proposals by early engagement through Planning Performance Agreement arrangements. This is a bespoke way of entering into early dialogue on emerging proposals, leading through to application submission and determination, and ultimately condition discharge on successful schemes. The Council can provide more certainty of timescales through managing the PPA process and being able to dedicate resources to those projects. The Council would encourage early conversations with Development Management Team to decide whether PPA is an appropriate route for a potential project.

Speeding up delivery following decision

- 4.5. The Council will seek to condition any planning permission to commence within 2 years from date of grant of planning permission to maximise the likelihood of delivery of housing in the short term. Where outline permission is granted, the Council will take a similar approach in reducing the implementation period to ensure expedient carrying out of development.
- 4.6. There will also be a change to recommendations in committee reports where permission is delegated subject to the completion of a S106 agreement. This will include a resolution that if the S106 is not concluded within 12 weeks of the resolution to permit, officers will have delegated authority to refuse the application. This will ensure that permissions are delivered in a timely manner, assisting in the reduction of the lead in time for completions to take place on sites.

A review of S106 procedures

- 4.7. Where positive pre-application advice has been provided, resulting in the identification of required planning obligations, the submission of a draft legal agreement with the planning application will be encouraged. This should enable the agreement to be ready for signature on the point of decision-making.
- 4.8. In parallel with this, the Council is working towards the production of a standard S106/Unilateral Undertaking template to assist and speed up this process.

Wider Review of the Validation Checklist

- 4.9. The Development Management team will be reviewing and updating the Validation Checklist to set out the submission package required to support valid planning applications made to the Council. Developers complying with the provisions of current and updated guidance will assist in reducing validation times. The updated Validation Checklist is scheduled to be in place by March 2024.

5. Future Review of this Statement

- 5.1. Monitoring and review of this statement will take place periodically, and no later than 12 months following adoption. Such reviews will establish if the shortfall for housing has been reduced and assess the overall effectiveness of this IHPS.