

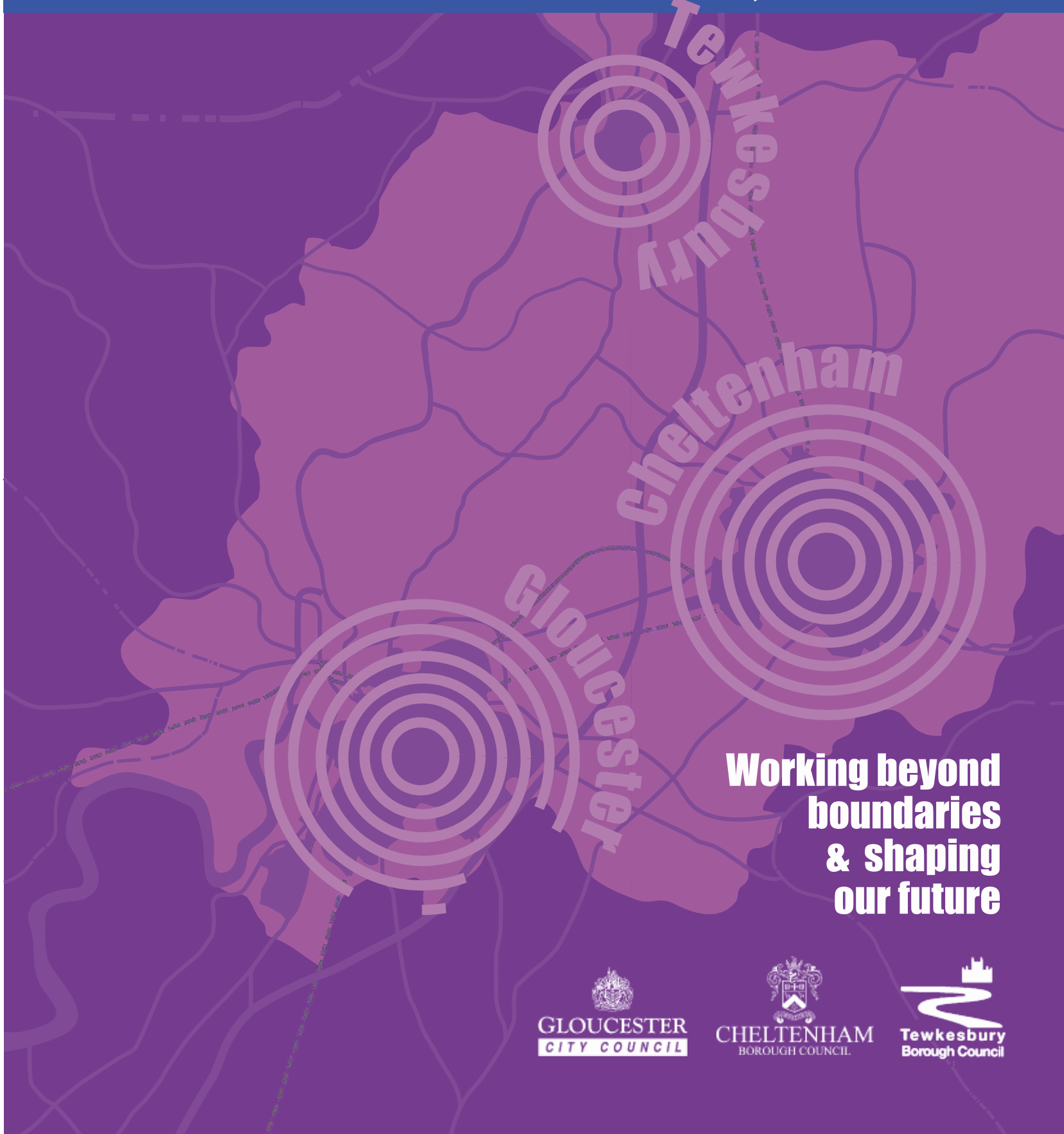


Joint Core Strategy

Gloucester • Cheltenham • Tewkesbury

Response Report on Consultation

Carried out to date Issue; October 2011



**Working beyond
boundaries
& shaping
our future**



**Joint Core Strategy
Response Report on Consultation Carried Out to Date
Issue: October 2011**

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Joint Core Strategy Consultation Response Report

A. Introduction and summary of activities

1. Introduction

The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The Councils will produce a co-ordinated strategy guiding how the three authority areas develop up to 2031. It will set out the their approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing, employment, key infrastructure, community, leisure and tourism facilities.

Preparing a Joint Core Strategy means making choices about how the area will develop, so it's important that local communities are involved and have a say in the future of their area. To ensure the JCS incorporates local opinions, as well as meeting Government tests of soundness, extensive consultation exercises have been conducted and will continue through the strategy's development.

The final version of the JCS is being prepared in two parts. Part 1 will include:

- An introduction to the JCS area, providing clear sense of place.
- A clear 'Vision' for how the JCS area will be in 2031 and
- 'Strategic Objectives' that must be fulfilled to achieve the Vision.

Part 2 will consist of the development strategy and policies designed (in response to the JCS evidence base and all consultation) to achieve the Vision.

Prior to writing the first part of the JCS, an *Issues and Key Questions* consultation document was published in 2009/2010, which was intended to generate debate before detailed options were developed.

Public consultation on the *Issues and Key Questions* document ran from 23rd November 2009 to 19th February 2010. The authorities then undertook a number of stakeholder consultations with Parish Councils, discussing both the *Issues and Key Questions* document and the public's response to it. The stakeholder consultation results can be found in appendix N of this report.

The second phase of consultation consisted of an online consultation on *Part 1* of the JCS document which was in response to the feedback of the *Issues and Key Questions* consultation. This focussed on the vision and objectives of the JCS and the preferred strategy. This consultation was published for eight-weeks between 14th June and 9th August 2010. A total of 76 organisations and individuals responded providing a total of 297 comments.

This report summarises the activities undertaken and the findings of the work to date, and will become part of the JCS evidence on which policy is based. The first half of the report focuses on the *Issues and Key Questions* consultation and the latter half concentrates on the *part 1* online consultation. Further stakeholder consultation will continue in parallel with the drafting of the *Developing Preferred Options Document*. The development options will be presented for public consultation in December/January 2011/2012 followed by a further *Preferred Development Option* consultation document in the summer of 2012.

2. Statements of Community Involvement / JCS Consultation Statement

The approach described and implemented complies with the Statements of Community Involvement (SCI) of all three JCS authorities, and with the JCS Consultation Statement of July 2009. The latter document can be downloaded from: <http://www.gct-jcs.org/PublicConsultation/Home.aspx>

3. Issues and Key Questions

3.1 Public exhibitions

The issues and key questions consultation consisted of a total of 17 manned exhibitions which were held across the three authorities (four in Gloucester, five in Cheltenham and eight in Tewkesbury Borough) between Monday 23rd November and Saturday 12th December 2009. To ensure good attendance, exhibition locations were chosen to cover as much of the JCS area as possible, and to include all key settlements at times convenient for the public.

Approximately 911 people attended the manned exhibitions, further details of which are provided in Appendix A. Officers in attendance answered queries, facilitated debate, and encouraged formal written/online response from visitors. Information and opportunities for interactivity were provided as follows:

- Branded banners
- Posters explaining the JCS and the nature of the consultation
- The 'Issues and Key Questions' document
- An Executive Summary of the document, presented as an A5 booklet
- A5 promotional leaflets
- Interactive A1 map of the JCS area (see section 6, below)
- Post-it notes for sharing ideas (see section 7, below)
- A4 questionnaires (see section 8, below)
- Reference map of constraints in the JCS area
- JCS database registration cards

In addition to the manned exhibitions, 25 unmanned exhibitions were held between Monday 23rd November 2009 and Friday 19th February 2010. These were held to raise awareness of the JCS and give the public a further opportunity to contribute. Unmanned exhibitions were held at university campuses, colleges, council offices and libraries. A selection of the material described above was available to read and to take away.

3.2 Publicity for the exhibitions

The JCS public consultation was publicised through the Councils' websites, the JCS website, Council magazine articles and official press notices. Letters were sent to all groups and individuals on the JCS database informing them of the consultation and how to get involved. Furthermore, letters and documents were sent to specific consultees, promotional posters were distributed to supermarkets and doctors surgeries, and the team worked with local media to generate free publicity.

Press and radio coverage included radio interviews, multiple newspaper reports, plus articles in local/parish magazines and newsletters.

Sample headlines from the Gloucestershire Echo include:

- "One voice on Gloucestershire's housing needed" – 19th November 2009
- "Have your say on future plans for Gloucester, Cheltenham and Tewkesbury" – 19th November 2009
- "Good public reaction to future plans for Cheltenham, Gloucester and Tewkesbury" – 26th November 2009
- "Have your say: Where should new houses be built in Gloucestershire?" – 27th November 2009
- "Tewkesbury Borough residents urged to have their say as exhibition moves to the town" – 7th December 2009
- "Publicity call over Gloucester housing plans" – 10th December 2009

3.3 Parish Council events

Five events were held as follows:

Cheltenham

- Monday 22nd February, 2-4pm, Municipal Offices, Pittville and Montpellier Room
- Wednesday 24th February, 5-7pm, Municipal Offices, Montpellier Room

Tewkesbury

- Tuesday 23rd February, 2-4pm, Tewkesbury Borough Council, Council Chamber
- Tuesday 23rd February, 5-7pm, Tewkesbury Borough Council, Council Chamber

Gloucester

- Thursday 4th March, 5-7pm, Gloucester City Council, North Warehouse, Committee Room 1

The five events were attended by a total of 40 representatives from 23 Parish Councils. A further 11 Parish Councils declined to attend having already submitted formal written representations to the public consultation, leaving 20 Parish Councils which did not engage with this stage of consultation.

The content and format of each of the five events was the same, reflecting the partnership approach to the JCS, though there was inevitably some local bias to discussion at each venue. Parish Councils were invited to attend the meeting geographically closest to them (regardless of Borough/City boundaries), but were welcome at any convenient event.

Each event began with an introductory presentation covering:

- The JCS context and programme
- Key issues raised during the public consultation
- Maps showing areas the public had highlighted as appropriate and inappropriate for new development (see Appendix C)
- Constraints maps for the JCS area (including the Area of Outstanding Natural Beauty (AONB), Flood Zones and Green Belt – see Appendix H).

Participants were then given more detail of public responses to the consultation, and asked to discuss and debate associated issues in a structured format based on eight themes: vision, sustainability, housing, employment, city/town centres, sustainable urban extensions, flooding and green infrastructure.

4 Part 1 – Online consultation

The Part 1 public consultation consisted of an informal online questionnaire which was published on the JCS website. Participants were given eight weeks to comment and could complete the questionnaire online or by post. The format of the questionnaire allowed respondents to answer 'Yes', 'No' or 'Other' with space below to provide further detail/comments as preferred.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

Joint Core Strategy Consultation Response Report

B. Consultation event responses – Issues and Key Questions

This chapter of the report will identify the findings of the *Issues and Key Questions* consultation. Chapter B will focus on the key responses which were received whilst using interactive maps, post-it notes, short questionnaires and parish council discussions. Chapter C forms a response report to the written representations which were made.

5 Interactive maps

An A1 map of the JCS area was provided at each public exhibition, and visitors were invited to place green dots where they feel development is appropriate and red dots where it is inappropriate.

Respondents placing dots generally defined 'development' as housing, though many raised the need for supporting jobs and services too. Respondents were encouraged to 'plan positively' and put a green dot somewhere for every red dot placed (if they felt it appropriate).

The outcome of the exercise is a composite map of dots (408 green and 538 red), shown in Appendix C. At first glance, red and green dots appear to be located in the same places, but on closer analysis there are marked differences. Some of the findings from this exercise are outlined below.

- Support for development within the major urban areas, plus Highnam and Stoke Orchard.
- Opposition to development on the urban fringes including South Cheltenham, Bishops Cleeve, Tewkesbury and Northway.
- Mixed views over development in North West Cheltenham with some respondents seeing it as the best location for growth if growth must happen, while there was strong opposition to such a move from other individuals and from groups including Save the Countryside and LEGLAG.

6 Post-it notes

A total of 736 comments were collected on post-it notes across all the manned exhibitions. Respondents used the notes to share ideas and concerns, sticking them to exhibition materials in public view. The notes were logged according to their place of origin, and categorised by type. Issues raised include:

- Concern over the scale, nature and need for growth proposed by the emerging South West Regional Spatial Strategy
- Concern over possible green belt changes
- The need to maximise development and regeneration opportunities within existing urban areas
- Flood prevention
- Public transport improvements
- The need for affordable housing
- Conservation and use of open spaces
- Recommendations for the development of specific sites.

A more detailed summary of these responses is provided in Appendix D. The comments summary shows the broad range of ideas and concerns raised by the public.

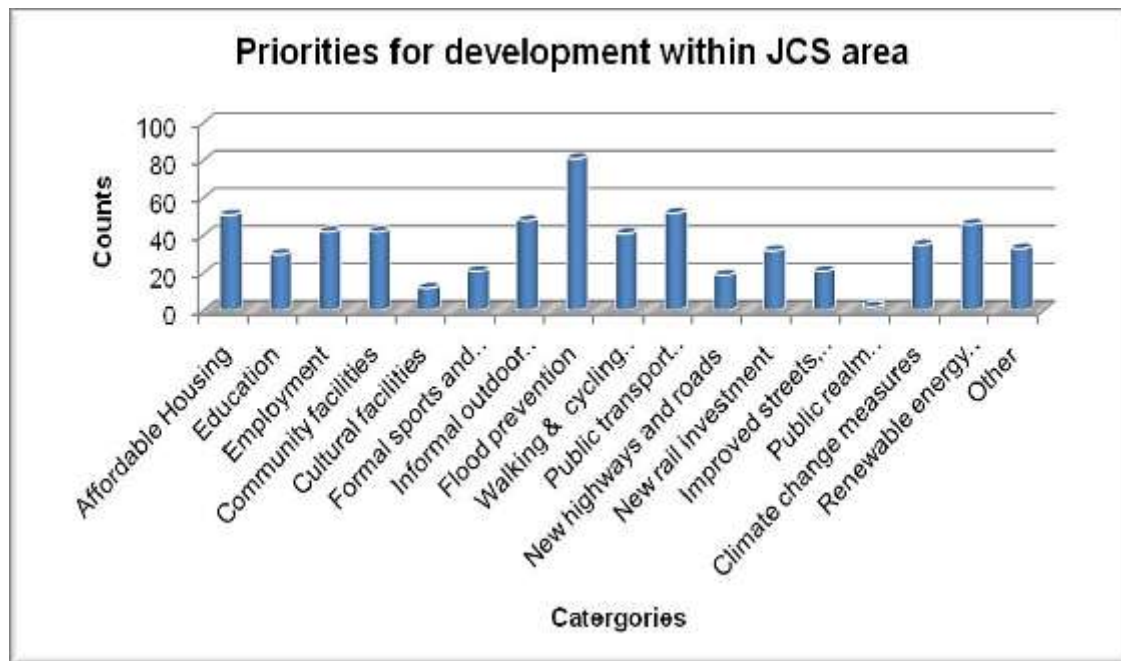
7 Short questionnaires

A short, printed questionnaire was provided at exhibitions, to capture the views of people who had an interest in the area/project. The questionnaire consisted of seven sections covering priorities for

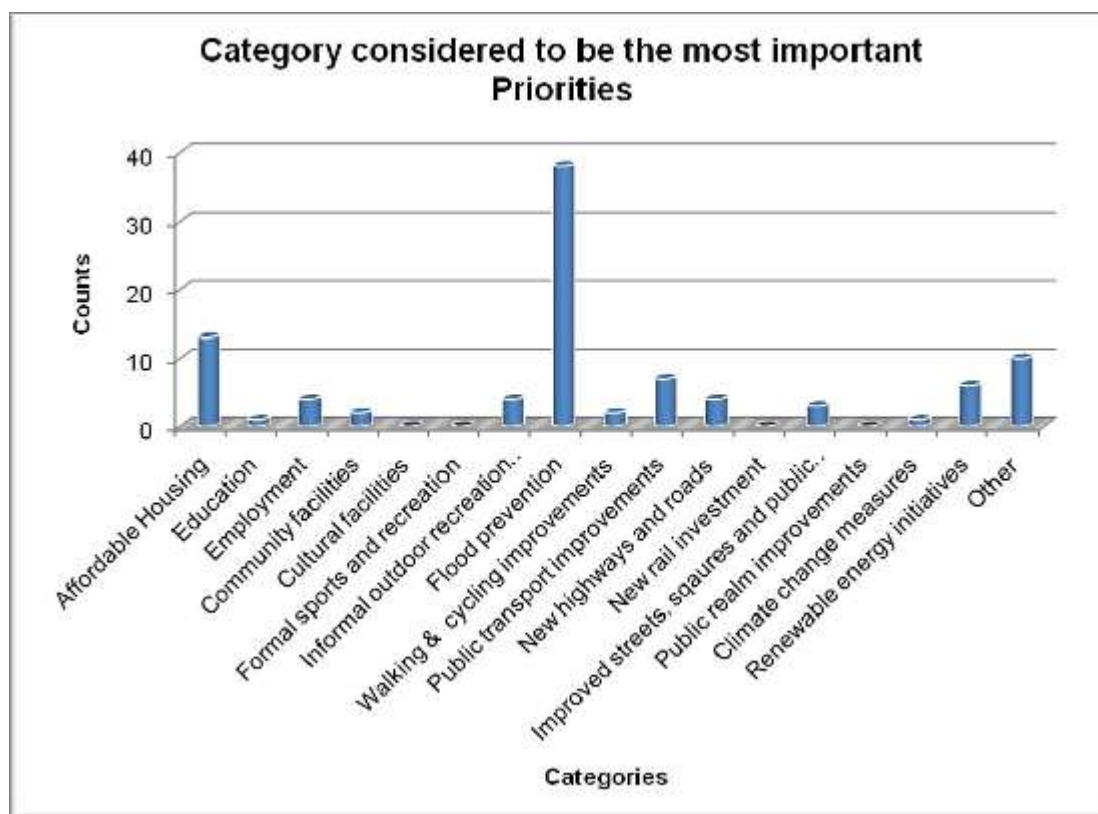
development and how and where development should be accommodated. A blank copy is provided in Appendix B.

The authorities received 110 completed questionnaires, a summary of which follows below.

Respondents were first asked to select up to six priorities for development in the JCS area. The chart below shows the number of responses for each option provided. The most common response was flood prevention with 81 votes, followed by public transport improvements, affordable housing and 'informal outdoor recreation and general open space'. Public realm improvements and cultural facilities received the fewest votes.



Respondents were then asked to choose their **top** priority from the six they identified previously. Flood prevention was the most important with 38 responses, followed by affordable housing, public transport improvements and renewable energy initiatives:



When asked whether urban areas should accommodate growth, 27 of the 110 respondents did not think urban areas should grow at all, but the majority took the view that if growth was going to happen it should be delivered by:

- Maximising opportunities within existing urban areas
- Higher density development
- Re-use of derelict brownfield sites, empty properties and council-owned sites, particularly for affordable housing.

Respondents considered that development should be near to transport routes and well-provided for in terms of infrastructure. Many respondents did not want to see development on greenfield/Green Belt sites, or sites of ecological importance, and certainly not in flood risk areas.

One respondent suggested that a small new town should be considered, and four respondents thought northwest Cheltenham could be suitable for development. It was also felt that small settlements would benefit from a limited number of additional houses, with fewer still in the smallest rural villages. Such development in rural areas was seen as helping to support the communities and their services, and providing affordable housing for young people, but without destroying the character of the area.

Respondents were asked to identify where they felt development would be suitable if it were to happen. Responses are listed and mapped in Appendix E.

Finally, respondents were asked which issues had been missed. These were identified as follows:

- Green/open spaces
- Wildlife and biodiversity
- Rural issues (including food production and public transport)
- Support for small businesses (including tourism) and encouraging sustainable commercial development
- Facilities for children and teenagers
- Design of new development (e.g. low energy housing and adaptability of housing to accommodate changing lifestyles)

- Health and community aspects, such as tackling poverty and deprivation
- Parking (including for lorries)
- Gypsy and traveller pitches
- Sustainable transport initiatives e.g. car clubs

8 Parish Council discussions

Parish Councillors attending the events endorsed the issues raised by the public and debated their own priorities. A separate report was written on the Parish Council events which is included in Appendix G. In addition, a short summary appears below:

Vision

- Focus on local community needs, not just regional housing targets.
- Protect the environmental, rural and urban characteristics that make the JCS area (and the separate and distinctive places within it) an attractive place to live and work.
- Address rural and urban areas/issues in a balanced way.
- Encourage sustainability/green living and prepare for climate change.

Sustainability

- Create integrated, self-sufficient communities.
- Maintain local and rural services.
- Support local food and green energy production.
- Improve energy efficiency of existing housing stock and new-build.
- Provide sustainable transport options including public transport and cycle routes.

Housing

- Concern was expressed over the scale and nature of housing need in the RSS.
- Use previously-developed land as a priority, and bring empty properties back into use.
- Link new housing provision to job creation.
- Provide adequate levels of affordable housing, including intermediate ownership schemes, within existing settlements not just urban extensions.
- Ensure new housing is: energy efficient; of high quality design and space standards; and planned to create mixed/balanced communities.

Employment

- Foster local specialisms, and develop a skilled local workforce.
- Balance manufacturing and service industries (including green / high-tech).
- Support agriculture and farm diversification.
- Provide incubator units for new businesses.
- Encourage home-working – e.g. through broadband provision.

City and town centres

- Regenerate/improve Cheltenham, Gloucester and Tewkesbury centres.
- Provide a better mix/range of quality chain stores and independent shops/markets supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.
- Halt out-of-centre retail development.
- Provide better access by public transport from rural areas. Promote pedestrian/cycle access and movement. Support well-placed park and ride schemes. Address parking costs.
- Make better use of vacant shop units, and empty properties above shops.

Sustainable urban extensions

- Concern was expressed over the form, location, need and evidence for urban extensions.
- Protect the Green Belt and avoid coalescence of settlements. Re-use brownfield sites and empty buildings before greenfield sites.
- If development does go ahead, ensure it provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies and flood risk.

Flooding

- New development must not increase (and should reduce) flood risk to existing properties.

- Flood zones should be defined with a margin to account for climate change, and should incorporate local knowledge. There should be no building on the defined floodplain.
- Flood risk assessment and flood defences must account for both fluvial and pluvial flooding.

Green infrastructure

- Protect the AONB, Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces etc.
- The Green Infrastructure approach was endorsed: connecting and managing all green spaces for free access and multi-functional use by all.

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C. Issues and Key Questions: Written representations and JCS responses

The 'Issues and Key Questions' document was available online throughout the consultation period, allowing comments to be submitted interactively. People were also able to respond by letter or email, with hard copies of the document sent to Parish Councils and made available to view at deposit locations across the three authority areas.

When the consultation period closed on 19th February 2010, responses had been received as follows:

- Online – 28
- Email – 181
- Post – 163
- In addition, 380 letters and forms were received in connection with campaigning by Save the Countryside and Leckhampton Green Land Action Group (LEGLAG).

Together, these responses add up to more than 2,500 representations on individual topic areas – the exact number is impossible to quantify due to the inter-related nature of issues raised. All the representations are summarised in sections 10 to 22, below.

PLEASE NOTE BEFORE READING:

Methodology

A qualitative approach was adopted for the analysis in an effort to present a balanced view of the diverse opinions expressed, highlighting areas of agreement and conflict. The report has extracted these issues for discussion.

Sources

All representations are reported anonymously. Each of these individual responses are an overview of the main points which have been raised to those questions asked.

Regional planning

As noted on page 6, this report was written when significant questions remained unanswered on regional planning, the emerging South West Regional Spatial Strategy, and Regional Planning Guidance 10. The new coalition government has promised major changes to regional planning and the planning system as a whole, but has not yet clarified details of the new regime. Such changes will of course be considered as they become clear throughout the development of the JCS. In the meantime, this document reports on issues associated with regional planning and the RSS as they were raised by respondents. More recently, the government have published the National Planning Policy Framework (NPPF) which is subject to public consultation and is expected to be formally adopted by April 2012. The NPPF will replace planning policy guidance and planning policy statements. The JCS will address the NPPF as it evolves following public consultation.

Transport, waste and education

Transport, waste management and education are the responsibility of UK county councils, and are outside the remit of district authorities and the JCS. Accordingly, these issues are not specifically addressed below, but are discussed under related sections (such as 'Housing' or 'Urban and rural issues') for which the JCS does have responsibility.

Representations made to the JCS on county responsibilities have been shared with Gloucestershire County Council. Indeed, the JCS authorities worked closely with the County Council in supporting their parallel development of the Strategic Infrastructure Delivery Plan (SIDP). The purpose of SIDP was to assess transport, education, health care and a wide range of other infrastructure issues, resulting in a costed schedule of requirements for incorporation in local Development Plan Documents. Whilst completion of SIDP was prevented by the government's decision to revoke Regional Spatial Strategies some of the basic work undertaken has been helpful in informing development of JCS preferred options for consultation. Further information on the SIDP can be found here:

<http://www.gloucestershire.gov.uk/index.cfm?articleid=95428>

9 Direction and content of the JCS

Respondents, including members of the public, statutory consultees, the Local Strategic Partnership (LSP) and the development industry, all expressed support for the principal of joint working between the three JCS authorities.

There was general agreement among respondents calling for the JCS to:

- Facilitate development that makes a positive contribution to the local environment, economy and community. Support and create sustainable, self-sufficient communities.

Officer response:

Agree – The JCS will work towards creating new sustainable communities.

- Protect the environmental, rural and urban characteristics that make the area (and the separate and distinctive places within it) a unique and attractive place to live, work and visit.

Officer response:

Agree – The unique character of the JCS area has been taken fully into consideration when identifying strategic new development areas within the JCS.

- Address rural and urban areas/issues in a balanced way.

Officer response:

Noted – The need for development in the JCS area is predominantly driven by population growth from within the urban areas. Growth within the rural areas is proposed by the JCS however the focus of new housing and employment development will be adjacent to the existing centres.

- Avoid focusing on land-use planning and urban regeneration to the detriment of social issues such as healthy lifestyles, educational attainment, community safety/crime/fear of crime, affordable homes for everyone, and meeting the needs of an ageing population.

Officer response:

Noted – these issues are taken into consideration by Sustainability Appraisal in order to ensure that new development takes into consideration social, economic and environmental factors. More detailed policies in the Preferred Options document will address these issues.

- Address inequalities in wealth, housing, education, employment and infrastructure provision.

Officer response:

Agree – New development across the JCS area will help provide more affordable housing, and more employment land thereby helping to reduce inequalities with regard to access to housing and employment. Developer contributions to public transport, highway infrastructure and education will also be sourced from new development.

- Support the shift to a low-carbon economy.

Officer response:

Agree – The JCS will promote sustainable development and support the shift to a low carbon economy.

- Encourage sustainability/green living and prepare for / adapt to / mitigate climate change, for example by: addressing flood risk; supporting appropriate renewable energy production; supporting local and community food production; minimising the need to travel and promoting sustainable transport options.

Officer response:

Agree – The proposed JCS Strategic Sites have all been selected for their ability to contribute to the aforementioned outcomes.

- Provide for high design standards in all new development, regeneration and refurbishment, from major projects to street furniture.

Officer response:

Noted - More detailed policies in the Preferred Options document and subsequent JCS authority Local Plans will address strategic design issues..

- Collaborate with neighbouring authorities at all scales (local, county and regional).

Officer response:

Agree – Neighbouring authorities within the County have been partners in econometric modelling. Out of county neighbours have been included in ongoing consultation.

- List all evidence and source documents.

Officer response:

Agree – This can be found on the JCS website

There was a marked split in opinion on housing provision (discussed in detail in section 14, Housing) with many respondents calling for the JCS to:

- Focus on local community needs, not just regional housing targets, and ensure a balanced approach to provision of employment, housing and social infrastructure.

Officer response:

Noted - The housing need figures have been produced from local population projection work and the Gloucestershire Affordability Model will be used to ensure housing and employment provision are balanced accordingly

- Protect environmental designations and restrict urban sprawl.

Officer response:

Agree – The strategic development sites identified seek to safeguard other areas that are subject to statutory nature conservation or high levels of landscape sensitivity. Urban sprawl is restricted by providing development at several sites around the existing main centres in a plan led approach rather than in an unplanned manner. Plan led growth is not urban sprawl.

- Direct development to brownfield sites before Greenfield.

Officer response:

Noted: In order to secure a mix of types and tenures of dwelling units and employment accommodation it will be necessary to provide greenfield land alongside the continued promotion of central regeneration sites.

However, the development industry called for the JCS to:

- Adhere to the growth projections in the emerging South West Regional Spatial Strategy (the RSS) such that new homes are provided to satisfy the demands of the current and future population “to support greater economic prosperity and address housing affordability”.

Officer response:

Noted: With the Coalition Government abolishing the RSS development requirement numbers have now been determined locally. Locally derived projection outputs are not dissimilar to RSS projections. A wealth of work has been undertaken by the JCS authorities to identify the most sustainable locations for strategic growth. Proposed strategic sites have emerged therefore from the culmination of much locally based evidence and research work.

- Provide for such growth in a sustainable and deliverable way, acknowledging the need to review the Green Belt.

Officer response:

Agree: An independent Green Belt Review has been carried out to inform the Developing Options Preferred Consultation and comprises part of the evidence base. All strategic development sites identified are considered to be the most sustainable and deliverable options. Further assessment of the Green Belt will be undertaken to establish whether additional development can be accommodated within the Green Belt areas.

10 Strategic objectives

Thirteen strategic objectives for the JCS were listed in the consultation document (see Appendix I) and were generally well-supported by respondents. Various specific text edits were recommended in line with issues described in section 10 (above) and throughout this document. General and conceptual criticisms of the strategic objectives were raised as follows:

- All objectives should be: specific, measureable, achievable, relevant and set within a time frame (SMART). The respondent suggested that the strategic objectives as currently drafted would fail these tests, appearing to be “a re-statement of the issue and vision”.

Officer comment:

Agree – JCS objectives are currently being developed in this manner.

- The objectives restate the requirements of the RSS and then suggest unrealistic options that include ignoring the requirements of the RSS.

Officer comment:

Noted. Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.

- The objectives do not focus sufficiently on the key issues (as required by Planning Policy Statement 12): the economy, jobs and housing need.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- Biodiversity should be protected, managed and enhanced for its own sake: a Green Infrastructure Strategy is not the only way of doing so. The development of increased access to green spaces is a separate issue which requires its own objective. Furthermore, the JCS must provide for the recreation of lost wildlife habitats, in addition to conservation.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- Strategic objective 3 received the greatest level of criticism; it appears in the consultation document as follows:

“If the Regional Spatial Strategy for the South West is published it will be necessary to meet its requirements in the provision of new homes that meet the variety of housing needs across the Joint Core Strategy area and, in particular, ensuring that the provision of new homes facilitates the attraction and retention of skilled people to ensure economic growth.”

Criticism of this objective was addressed as follows:

- The language and tone used is negative and defensive. The objective should be framed positively and should set as an objective the delivery of sufficient new housing to meet the needs of the expanding population and ensure greater affordability for all sectors of the community. The JCS should support the delivery of housing in order to meet the needs of the area (as quantified through solid evidence), and should not imply that the delivery of new housing is a forced obligation through the RSS.

Officer comment:

Agree – Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.

- Unqualified support for undifferentiated economic growth is not always a good thing – rather there should be a proper understanding of what genuinely sustainable economic development will mean.

Officer comment:

Noted.

Additional strategic objectives were suggested for consideration as follows:

- To safeguard the strategic resource of best and most versatile agricultural land, by avoiding development on all land used for agriculture and by restoring land which has fallen into disuse.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- To promote, protect and enhance the vitality and vibrancy of the area's city and town centres.

Officer comment:

Noted. This will be part of the strategy with Gloucester Heritage Urban Regeneration Company and Cheltenham Development Taskforce support.

- To seek delivery of additional renewable energy generation capacity in the JCS area.

Officer comment:

Noted. The JCS recognises the threats from Climate Change and will address this within the strategy.

- To provide a sufficient quantity and range of housing to ensure that local needs and demands are met throughout the plan period.

Officer comment:

Noted. Development requirements within the JCS area have been identified by using local data sources.

- To direct development to locations which can best deliver sustainable development having regard to accessibility, the availability of infrastructure and the absence of strategic constraints.

Officer comment:

Noted. This is dealt with by a number of objectives in terms of sustainability.

- To secure the comprehensive regeneration of vacant/underused brownfield land (as opposed to the sites being tested simply as opportunities to deliver a given quantum of housing or employment).

Officer comment:

Noted. Urban regeneration initiatives are already being promoted through Gloucester Heritage Urban Regeneration Company and Cheltenham Delivery Taskforce.

- To provide safe walking or cycling to a wide range of shopping, employment and community facilities as a key element of a sustainable, low carbon future.

Officer comment:

Noted. This is dealt with by a number of objectives in terms of sustainability.

11 Vision and priorities for the JCS area

Respondents suggested that the JCS area, its residents, workers and visitors should enjoy:

- A high quality of life with improved open spaces, education, health and leisure, plus high public safety and low fear of crime.

Officer comment:

Agree

- Thriving rural and urban communities, engaged with planning their own futures.

Officer comment:

Agree

- Protection from flooding, and the mitigation of flood impact.

Officer comment:

Agree

- A mixed economy (agriculture, manufacturing and services), and a highly-skilled workforce attracting inward investment.

Officer comment:

Agree

- Affordable, well-designed housing for all – urban and rural – in mixed communities with good access to services and employment.

Officer comment:

Agree

- Good road/rail infrastructure and traffic management, plus better public transport, walking and cycling routes.

Officer comment:

Agree

- Good access to the countryside and green spaces.

Officer comment:

Agree

Respondents pointed out that the strategic vision should reflect the respective Sustainable Community Strategies and Community Safety Strategies of the three authorities. Many respondents also

suggested that the overall strategic vision should be complemented by separate visions for specific places/areas in response to the diversity of issues at different locations. For example:

- Gloucester's vision may centre on urban regeneration;

Officer comment

Noted and a revised version of the vision will address this point.

- Cheltenham's vision may centre on finding an acceptable suite of provisions to meet housing and employment needs; and

Officer comment

The revised vision will look at separate parts of the JCS area but not down to the level of individual settlements outside of the main centres

- Tewkesbury's vision may centre on improving its attractiveness as a historic market town.

Officer comment

Noted

- A specifically-rural vision was suggested (in response to criticisms of its absence) as follows:

Some respondents suggested separate visions are also required in areas targeted for growth by the RSS, for example Bishops Cleeve.

Respondents were asked to give their priorities for delivery through development. Many respondents criticised the use of prioritised lists, highlighting the interdependency of items likely to appear on them; citing site-specific variations and the need to consider sites individually; and querying the definition of 'development' in this context. Other respondents suggested the single priority is to meet the development requirements of the RSS. In acknowledgement of these criticisms, the following development outcomes are identified (in no particular order) as of greatest interest to respondents:

- Flood protection and mitigation
- Affordable housing
- Social/community facilities and infrastructure (including education)
- Sensitive regeneration of town and city centres
- Employment
- Climate change adaptation and mitigation measures
- Renewable energy initiatives
- Public transport
- New roads and highways
- Walking and cycling improvements
- Public realm improvements
- Formal and informal open and recreational space
- Community safety
- Waste reduction and management

Officer comment

These are all legitimate issues which need to be considered in the preparation of the JCS. All of the potential scenarios to be presented as options will be tested against a wide range of sustainability and strategic objectives, including those in the list above.

12 Sustainability

There was support for the JCS leading the way in preparing for and mitigating the impact of climate change. Respondents indicated that the JCS should address social, economic and environmental sustainability (known as the 'three pillars of sustainability'). Many respondents showed a good understanding of the need to incorporate sustainability into all aspects of the JCS, and not to view it as an 'add-on'. Accordingly the three pillars inform all of the sections in this chapter, but some specific comments are highlighted here with respondents calling for the JCS to:

- Avoid urban sprawl and the accompanying loss of productive land, loss of amenity space, increased traffic congestion and pollution, increased flood risk, and the negative impact on the Cotswold Area of Outstanding Natural Beauty (the AONB). Many respondents highlighted our responsibilities to future generations in this respect.

Officer response:

Noted – The JCS seek to protect these designations wherever possible.

- Maintain local and rural services – including through the development of new housing, services, community facilities and wider infrastructure at an appropriate scale to existing settlements.

Officer response:

Agree – Moderate development in rural areas can help to retain rural services.

- Support local food production – including through vegetable-growing schemes, provision of allotments, support for local shops/farmers, and preservation of productive agricultural land (preventing development on ‘best and most versatile’ (BMV) agricultural land: grades 1, 2 and 3a). Many respondents expressed concern over future food security in the UK and the corresponding need to preserve agricultural land.

Officer response:

Agree – The JCS will seek to protect high quality agricultural land to enable local food production to continue.

- Design to reduce energy consumption, and support local green energy production through:
 - Conducting a Renewable Energy Viability Assessment
 - Micro-generation
 - Hydro power
 - Solar and photovoltaic power
 - Air and ground source heat pumps
 - Geothermal power
 - Biomass boilers and use of woodfuel in association with woodland management
 - Combined heat/power plants
 - Energy-from-waste
 - Setting targets for renewable energy production on new developments (e.g. 70%). This approach was opposed by some who recommended that the JCS seeks a reduction in *overall* carbon emissions rather than focusing on one approach.
 - Most respondents advocated the “measured proactive” approach described in the consultation document (as opposed to “business as usual” or “very proactive” options), however this was criticised by energy professionals as an artificially constructed middle-ground with no basis in policy.
 - Several respondents highlighted the potential employment benefits of green technologies and energy production – see section 15, Employment.
 - There were mixed views on the need for and impact of wind turbines and the proposed Severn Barrage. There is a clash in many respondents’ high prioritisation of renewable energy initiatives and their reluctance to accept intrusive projects.

Officer response:

The JCS will ensure that strategic developments are designed to reduce energy consumption and support local green energy production.

- Improve the energy efficiency of existing housing stock and new-build. Many respondents called for the JCS to consider setting targets beyond those of central government policy and building regulations. However, the development industry highlighted the ambitious nature of targets already set, the need to consider viability, and the statutory requirement for any departure from national policy to be justified by evidence (in this and other areas of concern).

Officer response:

Noted: The JCS will have a duty to respond to national targets; therefore local targets are most likely not be set. The national planning policy framework encourages authorities to consider the viability of developments when determining applications, therefore, exceeding government sustainability targets could potentially make developments unviable.

- Reduce the need to travel and provide sustainable transport options including public transport and cycle routes/parking – but the JCS must acknowledge the likely continued dominance of the private car in rural areas. Concern was expressed for the Councils’ failure to enforce corporate green travel plans, and for the expense of using local park and ride schemes.

Officer response:

Noted.

- Create integrated, self-sufficient and sustainable communities through a combination of all the above and other initiatives.

Officer response:

Agree – the broad locations will be located in sustainable locations which will provide new infrastructure whilst improving existing provisions.

13 Housing

Housing was a dominant theme of discussions, with many respondents being well-informed about housing issues arising from the emerging South West Regional Spatial Strategy (RSS). Many respondents expressed significant objections to the scale and nature of new housing proposed in the RSS, but concern was also raised for housing affordability (in both rural and urban areas) with a corresponding acknowledgement of the need to accommodate demand through appropriate housing construction, balanced with initiatives to bring empty properties back into use. Many respondents expressed a strong preference for brownfield development before greenfield.

Many rural residents expressed concern for the young being priced-out of villages (resulting in divided families and aging rural populations), and for the limited opportunities to provide affordable housing in many villages. This was seen as resulting from: the lack of social infrastructure and employment in villages; the view that villages are not sustainable locations for new housing; and the fact that new affordable housing is usually provided in conjunction with new market housing, suggesting a scale of development that conflicts with many village residents' idea of what is acceptable growth.

Respondents called for the JCS to:

- Provide housing types and numbers to suit current and projected local need, not central Government targets – this to include housing for the elderly and young families for example.

Officer response:

Agree – Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period.

- Determine local housing need and secure community buy-in, for example by encouraging Parish Councils to conduct housing needs surveys to determine the target population for affordable housing and the number of units needed.

Officer response:

Noted – Rural communities will have the opportunity through the Developing Preferred Options Consultation to identify whether they could accommodate growth.

- Link new housing provision to job creation.

Officer response:

Agree – Identified strategic sites in the first 10 years of the plan period will provide employment as well as housing land

- Adopt a sequential approach, first bringing empty properties back into use (e.g. above shops), then focusing new housing provision on brownfield sites (prioritising urban areas while allowing limited development in villages). Respondents who acknowledged a need to include some greenfield development suggested it must only occur on the most sustainable sites, and must be phased to avoid undermining the preferred delivery of housing on brownfield sites (see also section 18, Deliverability and phasing). Many respondents opposed the development of private gardens for housing, while others viewed such sites as sustainable (being close to services) but requiring stringent design standards if developed.

Officer response:

Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing

- Manage affordable housing provision by setting evidence-based thresholds and targets (with a defined split between social rented and shared equity). Respondents suggested thresholds between two and 15 (to include both new build and conversions), and targets between 35% (in line with the RSS) and 50%. Several respondents suggested setting site-specific figures, or varying figures according to settlement type and size in line with guidance from the Campaign to Protect Rural England (CPRE) – e.g. thresholds may be lower in rural than urban areas, and selected rural sites may be allocated for 100% affordable housing, or market housing may be limited (as in Cotswold District). Several respondents highlighted that the JCS will outlast the economic downturn and called for high and defensible targets/thresholds in spite of developers' likely viability objections.

Officer response:

Noted – The JCS will contain evidence based thresholds with regard to affordable housing requirements, this will include strategic sites.

- Support intermediate ownership schemes and key worker housing.

Officer response:

Noted – Increasing the supply of housing across the JCS area will help to improve access to affordable accommodation for all.

- Ensure new housing is: energy efficient; of high quality design and space standards (e.g. Lifetime Homes and/or standards set by the Commission for Architecture and the Built Environment and the Royal Institute of British Architects (CABE/RIBA)); secure by design; in keeping with local character; of higher density in urban areas; and planned to create mixed/balanced communities.

Officer response:

Agree – In order to be sustainable it will be necessary for new development to comply with rigorous design requirements. It is intended that the JCS will include policies on sustainable development and design.

- Ensure developers demonstrate adequacy of infrastructure on and adjacent to development sites, such that existing residents will not suffer adverse impacts of growth. Where an adverse impact is shown, developers should fund infrastructure upgrades accordingly.

Officer response:

Noted – Currently developers contribute to site related infrastructure through S.106 legal agreements. This may be replaced by a Community Infrastructure Levy across the JCS area. The need to ensure not only physical infrastructure but community infrastructure requirements are met is noted. Each planning authority will negotiate relevant contributions through the planning process based on evidenced need.

- Ensure major new developments are assessed and provided for in terms of accessibility to acute hospital services (Gloucestershire Royal and Cheltenham General Hospitals) and the impact placed upon them in terms of increased patient numbers and distances travelled.

Officer response:

Noted – All strategic sites for the first 10 year period of the plan lie adjacent to the existing urban centres, further consultation with the NHS Trusts will ascertain response times and anticipated increase in patient numbers.

- Provide affordable housing within existing settlements, not just urban extensions. This should include provision of appropriate new housing and supporting development in villages and rural areas.

Officer response:

Noted - New housing in JCS rural areas will be required to provide affordable units as identified by evidenced local need.

- Address issues arising from high levels of second home ownership.

Officer response:

Noted – This matter is not within the remit of the Joint Core Strategy although an allowance for second home ownership is made within the housing projection work.

- Provide adequate, specialist homes for the elderly, to free-up larger homes for families.

Officer response:

Noted – Where evidence points to the need for provision of specific types of accommodation the JCS will seek to provide a policy response.

- Ensure no new housing is built adjacent to waste processing facilities.

Officer response:

Agree – The impact of constraints such as cordon sanitaires has been carefully considered in the process of identifying strategic sites for new development.

- Ensure adequate provision of children's play space in all new developments – e.g. in line with guidance from Play England's document, Better Places to Play Through Planning.

Officer response:

Agree – The provision of public open space in new strategic sites will be negotiated through the development process in accordance with the POS standards of each local authority. It will also be informed by emerging green infrastructure work.

Many members of the development industry indicated agreement with the public's suggestions regarding mixed communities and the design of new housing. Some also suggested varying affordable housing targets by site, according to local need/conditions/settlement type. However, there was a marked divergence in views on other matters. Developers highlighted the statutory requirement to consider viability in setting affordable housing targets and thresholds (PPS3, paragraph 29), and for flexibility (PPS12, paragraph 4.46), and called for the JCS to:

- Comply with national and regional planning policy, accommodating housing targets in the emerging RSS, and including an evidence-based Green Belt review to ensure delivery of sites to meet housing need (over-reliance on brownfield land being seen as a restriction on choice, viability and delivery).

Officer response:

Noted – It has been necessary, owing to the proposed abolition of the South West Regional Spatial Strategy to determine housing numbers locally. A Green Belt Review has been undertaken to inform the developing preferred option consultation and is available to view on the JCS website. A further Green Belt Review is planned.

- Provide a simple, flexible and transparent affordable housing policy, establishing a base level of provision and a set of circumstances where, if proven, the level of provision can be reduced with reference to viability.

Officer response:

Noted – Please refer to the above Affordable Housing statement

- Avoid site-specific affordable housing targets.

Officer response:

Noted – Please refer to the above Affordable Housing statement

- Balance affordable housing targets with the cost of other Section 106 priorities (e.g. education, emergency services).

Officer response:

Noted - S.106 contributions are negotiated on a site by site basis between the local authority and developer. The commercial viability of a scheme may be cited as a reason to reduce requested S.106 contributions. Local authority's can undertake their own assessments of the viability of schemes to challenge evidence presented by developers. It will be for each local authority within the JCS area to determine the level of contributions sought owing to issues presenting on a site by site basis.

- Set a threshold for affordable housing of 15 units in line with PPS3.

Officer Response:

Noted – The affordable housing threshold across the strategic sites adjacent to main urban areas will be informed by the Strategic Housing Market Assessment (SHMA) which has been produced by Gloucestershire County Council working with the 6 authorities within the County. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- Provide for phased development of both brownfield and greenfield sites in acknowledgement of changing economic conditions during the plan period, and of the need to provide a range of housing sizes, types and tenures.

Officer response:

Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. Exact phasing arrangements will be set out in the preferred options document in 2012.

- Include a viability assessment of affordable housing targets as part of the evidence base.

Officer response:

Noted - A Viability Assessment will be undertaken for the JCS as a whole which will incorporate affordable housing viability.

- Include a robust series of site allocations to be tested through the examination process.

Officer response:

There is a hard focus on the first 10 years of the plan period with regard to identifying strategic sites for development in the JCS area.– For the first 10 years of the plan (2011-2021) it will be

necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. The development industry has been consulted with regard to the strategic suites proposed as well as on the Strategic Housing Land Availability Assessment which looks at potential sources of land for housing supply across each JCS authority. It is therefore considered that the strategic sites selected for the first ten years are robust and satisfy the tests of availability.

See also section 18, Deliverability and phasing, below.

The consultation sought respondents' views on provision of sites for Gypsy and Traveller accommodation. Respondents called for the JCS to:

- Ensure adequate provision of sites over the whole plan period with consideration of viability and deliverability.

Officer comment:

Noted - the JCS will identify and assess potential sites for the gypsy and traveller community as part of strategic allocations, having regard to both viability and deliverability.

- Strike a balance between the needs and reasonable expectations of the settled community and local businesses, and the needs and aspirations of Gypsies and Travellers.

Officer comment:

Agreed. The JCS will aim to balance and provide for the needs of all communities.

- Encourage full use of any under-utilised existing sites (e.g. by refurbishment), then consider extension of these sites where appropriate.

Officer comment:

Noted. When planning for additional gypsy and traveller sites in the JCS area regard will be to the level of local need, based on an understanding of existing site provision and estimated future needs.

A specific, targeted 'call for sites' for gypsy and traveller sites was undertaken between September and November 2010 whereby local communities and landowners were invited to submit sites for consideration for residential sites for the gypsy and traveller community. Moving forward, the 'call for sites' is ongoing and runs from April to March of the next year. This will provide the opportunity for the submission of potential sites for assessment, including extensions to existing sites, on an annual basis.

- Encourage the use of vacant or unused land owned by local authorities. Make full use of the registers of unused and under-used land owned by public bodies. Exercise discretion in disposing of land for less than best consideration as set out in ODPM Circular 06/03.

Officer comment:

Comment noted.

- Provide a number of smaller sites (10 pitches or less) rather than concentrating provision in large sites or in one area.

Officer comment:

Agree. Officers are aware that some traveller communities prefer to live on smaller sites of around ten pitches. Regard will be had to this when identifying and assessing potential sites for traveller communities, in consultation with representatives from the gypsy and traveller communities.

- Develop brownfield sites before greenfield, avoiding sites at risk of flooding (due to the particular vulnerability of caravans).

Officer comment:

Agreed. The JCS (and other development plan documents) will encourage the development of brownfield land before greenfield land wherever possible. In relation to flood risk, a sequential approach to site identification will be applied for different uses, in accordance with Planning Policy Statement 25 'Development and Flood Risk'.

- Ensure good local access to schools, doctors and other essential services to reduce the need for long distance travel.

Officer comment:

Agreed. Site identification through the JCS (and other development plans) will have full regard to sustainability objectives as set out in Planning Policy Statement 1 'Delivering Sustainable Development'.

- Consider sites within or adjacent to (on the periphery of) sustainable urban extensions (SUEs). However timing of delivery must be considered as delivery of the SUEs is uncertain and if permitted will be a long way off. Circular 1/2006 (paragraph 12 c) requires authorities to address under-provision in a 3-5 year period, meaning urban extensions should be reserved only for future needs and growth.

Officer comment:

Noted. The JCS will consider the inclusion of sites for the traveller community as part of sustainable urban extensions. It is likely that other, smaller scale site provision will be made through other development plan documents to be prepared by the individual authorities.

- Prevent the purchase of farm land by Gypsies and Travellers for permanent occupation.

Officer comment:

Comment noted. Planning authorities cannot dictate who purchases land on the open market. They can however ensure that proposals for sites for the traveller community are assessed against relevant planning policy to ensure they are located in the right location, and developed in the right manner, protecting the amenities of neighbouring uses.

- Ensure sustainable foul drainage infrastructure is provided. Consider Circular 03/99: Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.

Officer comment:

Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.

- Ensure consultation with Gypsies and Travellers is direct and accessible in line with paragraph 27-29 of Circular 1/2006. Representative bodies (e.g. Friends and Families of Travellers, and the Traveller Law Reform Project) can give their opinion but such responses are not sufficient to satisfy needed community involvement.

Officer comment:

Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.

- Consider producing a joint dedicated Gypsy and Traveller Development Plan Document (DPD).

Officer comment:

Comment noted. This is not something that is being considered at this time. It is envisaged the JCS and other development plan documents will be the vehicle for identifying a future supply of sites for gypsy and traveller communities, based on an understanding of local future need.

- Incorporate Site Grant Guidance (Homes and Communities Agency, Jan 2009).

Officer comment:

Disagree. It would be inappropriate for the JCS to contain detailed guidance in relation to the Gypsy and Traveller site grant guidance.

14 Employment

Many respondents were more concerned about jobs than housing given the current economic downturn, with several highlighting a historic deficit in provision of employment land across the area (and particularly in Cheltenham). Similarly, many respondents were critical of the emerging RSS claiming it focuses on housing at the expense of employment. Respondents called for the JCS to:

- Develop a skilled local workforce and reduce the need to import skills: focus on education, targeted at the needs of current and future local employers.

Officer response:

Agree – The JCS provides for inward investment in the area therefore providing confidence for local employers to invest in the skill base of existing and new employees. Beyond the JCS, future

work developing development management policies can also look at other means of promoting the local workforce through e.g. local labour agreements and training schemes tied to a planning consent.

- Provide adequate and appropriate land for employment uses, in balance with housing provision across the area, allowing people to live near where they work (while understanding that this is not always possible and some people will/must commute).

Officer response:

Agree – Employment land at Gloucester, Tewkesbury and Cheltenham is proposed to be included within the strategic development sites.

- Provide sufficient, suitable and appropriate employment land for modern businesses, to meet a range of employment needs including: rural workshops, starter units, intermediate units, general employment sites suitable for a range of businesses, plus larger sites to attract major inward investment to the area. Recognise that many land uses can deliver economic development and job creation, not just those in the B-classes (business, general industrial and storage/distribution).

Officer response:

Agree – A mixture of types and sizes of units is desirable but also so is a focus on flexibility so that units can be reconfigured or put to alternative employment uses more easily. The evidence in the Employment Land Review confirms that there are a number of sectors beyond the B Class uses which will contribute even more to overall employment levels in future.

- Provide a dispersed pattern of employment, balanced between urban and rural areas as follows:
 - Meet the needs of major employment key sectors at or adjacent to Gloucester, Cheltenham and Tewkesbury/Northway.
 - Provide more limited allocations for employment uses in rural areas.

Officer response:

Partly Agree – Employment provision across the whole JCS area should be promoted wherever practicable but any dispersal must be sustainable and avoid inappropriate large scale developments that would attract high volumes of commuting in remote rural locations.

- Adopt a sequential approach to employment development (as recommended for housing, section 14), prioritising accessible, serviced brownfield sites in the main urban areas over greenfield development on the edge of town.

Officer response:

Agree – A sequential approach is sensible and making use of existing brownfield sites is favoured. However, there may be instances where some employment provision is required outside of the existing centres e.g. to support housing development which may be occurring away from a town centre location.

- Protect environmental and heritage assets (in their own right, but also as the foundation of the tourist industry and associated employment; and as a key reason why the area is a nice place to live/work that may attract people to start a business here).

Officer response:

Agree – The JCS area has a rich heritage which requires protection. However, where employment uses can proceed whilst avoiding an adverse impact or would deliver the necessary funds to conserve a heritage asset then this should be considered favourably.

- Avoid the significant loss of accessible urban employment land to other uses as part of regeneration projects.

Officer response:

Agree – Retaining viable and sustainable employment land is critical but there may be some instances when in order to deliver successful regeneration on less viable or less sustainable sites, alternative uses may need to be considered to facilitate delivery.

- Balance manufacturing and service industries, and support agriculture.

Officer response:

Agree – The JCS supports all of these uses along with others. However, the JCS shall not be prescriptive in terms of these being the only acceptable uses and needs to retain sufficient flexibility to respond to growth and decline in different economic sectors.

- Support rural employment and ensure the viability of farm holdings and woodland enterprises (which underpin the conservation of landscapes and wildlife habitats). Respondents made specific calls for the JCS to:
 - Sustain the land-based sector
 - Enable farm diversification
 - Enable new small-scale business to set up in under-used and redundant farm buildings
 - Encourage home-based working
 - Support and promote rural tourism (but avoid over-reliance on this sector due to work being primarily low-paid and seasonal)
 - Support niche farm products and markets

Officer response:

Agree – Greater endorsement of existing rural employment and further rural employment opportunities should be provided within the JCS. Some flexibility as to the types of uses which are acceptable in rural areas should be allowed whilst avoiding large-scale and unsustainable rural development.

- Secure prompt deployment of high-speed broadband and provide for telecommunications (in line with PPG8).

Officer response:

Agree – The JCS fully supports this objective.

- Foster local specialisms, e.g.:
 - Gloucester – manufacturing
 - Cheltenham – services, tourism
 - Tewkesbury – light industry, logistics, tourism
 - Outer areas – tourism, home working, farming and diversification, cottage industries

Officer response:

Disagree – there is a need to be cautious about specialisms as a downturn in a single sector economy can be severe. An element of diversification is required and will be supported by the JCS.

- Support development of high-tech industry across the JCS area.

Officer response:

Partly Agree – The JCS shall support the high-tech industry but also continue to support other sectors to ensure there is sufficient diversification of the local economy.

- Include employment uses and live/work units in any urban extensions.

Officer response:

Agree – Employment uses can be complementary to housing development in order to provide for some local jobs provision. Live/work units are generally acceptable but must be in balance with the existing or proposed mix of uses to deliver sustainable communities

- Consider the provision of employment space in light of: increased development densities; reduced on-site car parking provision; open-plan workplaces; and modern working practices such as home-working and hot-desking; all of which may reduce employment land-take.

Officer response:

Agree – The JCS is informed by an ongoing Employment Land Review in which these types of issues are factored in.

- Plan for the continued development and use of local military bases in light of the changing role and requirements of the armed forces and their holdings.

Officer response:

Agree – the JCS maintains dialogue with the local military bases to stay informed of any changes in circumstances.

- Enforce green transport plans of major employment sites (GCHQ was criticised for failing to follow its own plan).

Officer response:

Whilst enforcement of travel plans may be beneficial, this is not a matter for the JCS.

- Competitively price the park and ride schemes (Cheltenham was described as being more expensive than both Bath and Oxford).

Officer response:

The pricing of Park & Ride facilities is not a matter for the JCS.

- Protect Staverton Airport as an important provider, accommodator and enabler of employment, a source of foreign exchange earnings, a profitable tax-payer benefiting all three JCS authorities, and a provider of sustainable transport options (given the high fuel efficiency of the smaller modern planes used there).

Officer response:

Noted – There are no current plans for any significant changes to the operation of the airport although the area as a whole is considered within the Broad Locations assessment work. It is recognised that there are important local employers here.

- Follow the guidance of Gloucestershire First's Integrated Economic Strategy, and the three councils' Employment Land Reviews.

Officer response:

Agree – It is important that decisions are based on sound evidence contained within the evidence base documents such as those mentioned here and also through public engagement. This will continue to be the case.

15 Urban and rural issues

Respondents wanted a balanced approach to rural and urban issues. Given that the majority of respondents (and national/regional planning policy) suggested that urban areas should be the focus of growth, specifically *urban* issues are dealt with first, and *rural* issues second. Respondents called for the JCS to:

All city and town centres:

- Secure the regeneration of Cheltenham, Gloucester and Tewkesbury centres, building on their existing strengths and facilities, with each place fulfilling complementary roles, and without compromising their distinct characters

Officer comment:

Agree – The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area.

- Regenerate rather than expand town centres – several respondents called for shrinkage of centres to create and concentrate vibrancy/activity, particularly in light of the current and anticipated future impact of online retailing. A minority wished to see the centres expand.

Officer comment:

Agree – Both Gloucester and Cheltenham councils are focussing on regeneration of their central brownfield sites in order to ensure the vitality and vibrancy of the town and city centres.

- Re-use existing buildings where possible (new is not always best or most sustainable).

Officer comment:

Noted – Where existing buildings make significant contributions to their locations local planning authorities may seek to retain them. This will be achieved through policies in Local Development Documents not through policies in the JCS.

- Provide a better mix/range of quality chain stores and independent shops/markets to enhance local distinctiveness and to create an 'experience' for users (Cirencester was cited as a good example). This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.

Officer Comment:

Noted – Improving the retail offer, regeneration and marketing of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Promote a range of uses in town centres which result in a balanced and safe evening/night time economy – control the quantity, type and location of evening or late night uses.

Officer Comment:

Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Halt out-of-centre retail development, including better control of supermarket development that draws trade from town centres. Some professional respondents accepted further out-of-town development providing the requirements of PPS4, Planning for sustainable economic development, are met.

Officer comment:

Noted – Applications for further retail development at out of centre locations will be robustly assessed in accordance in accordance with national planning policy guidance/framework taking into consideration the requirements of the sequential and impact tests.

- Make better use of vacant shop units and empty properties above shops (e.g. for affordable housing).

Officer comment:

Noted – Existing urban capacity within centres has been taken into consideration in determining locally derived housing figures.

- Provide support for more people living in town/city centres to create busy street-life around the clock, to foster a sense of community, and to improve safety after dark.

Officer Comment:

Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Maintain provision of public conveniences.

Officer Comment:

Noted – Improving regeneration and public facilities of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Restrict street clutter and promote high-quality public spaces, signage and street furniture.

Officer Comment:

Noted - This matter will be addressed through detailed design policies in each authority's Local Development Documents.

- Provide for transport improvements as follows:
 - Improve links between Gloucester, Cheltenham and Tewkesbury
 - Improve traffic management, and locate new development to minimise congestion (significant concerns were expressed over the impact of major development to the south of Cheltenham)
 - Reduce the dominance of vehicles in town centres – promote pedestrian/cycle access and movement
 - Support well-placed and competitively-priced park and ride schemes
 - Maintain separate train stations for Cheltenham and Gloucester (do not merge in favour of an out-of-town 'parkway' station) and improve services to London (to reduce numbers driving to Swindon to catch fast services)
 - Provide for a new mainline rail station at Gloucester
 - Support the re-dualling of railway between Swindon and Kemble
 - Support the opening of the Honeybourne Line to Stratford on Avon, with a cord to the Oxford and Paddington Line
 - Improve bus services at Ashchurch Station (Tewkesbury Parkway)
 - Provide for completion of the A417/419 missing link
 - Provide for further development of Staverton Airport
 - Improve canal and river infrastructure
 - Provide free/more affordable car parking to better compete with other centres
 - Consider using the A417 to bypass Cheltenham both to the east (with A435) and to the southwest.

Officer Comment:

Noted - Local Transport Plan 3 (LTP3), prepared by the County Council, is the main policy document for improvements to transport in the JCS area, however the JCS will be the delivery tool for many proposals within LTP3.

Developers called for the JCS to:

- Identify the principal areas to which regeneration policies apply and allocate key sites (thus allowing thorough testing of site deliverability against PPS3, and opening dialogue with landowners such that allocated sites are robust and deliverable in agreed timescales). There was disagreement over the use of the JCS or a Site Allocations DPD for this purpose.

Officer comment:

Noted - It is intended that the JCS will identify with a 'sharp focus' suitable, achievable & deliverable sites outside urban areas for development for the next 10 years, a 'softer focus' will be applied to sites for the last 10 years of the plan period. The SHLAA which comprises part of the evidence base for the JCS is subject to input from the development industry, moreover comment was invited from the development industry with regard to consideration of 'broad locations' when ascertaining areas of search for new strategic sites.

- Avoid imposing a phasing policy for the delivery of urban brownfield land prior to the urban extensions. Such a policy was seen as ignorant of technical and financial viability constraints, and of failing to address family housing needs given the preference for apartment development on urban regeneration sites. See also section 18, Deliverability and phasing.

Officer comment:

It is appreciated that both brown and green field sites need to be provided in order to secure a mixed supply of type and tenure of housing. The JCS will not be identifying brown field sites within urban areas as these comprise part of the existing housing supply in the JCS area, it is intended however that over the first 10 year period such urban capacity sites will be built out alongside strategic green field sites identified by the JCS.

Gloucester:

- Priority should be given to the regeneration of the Kings Quarter, Blackfriars and Greyfriars in line with Gloucester Heritage Urban Regeneration Company (GHURC) proposals.

Officer response:

Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.

- Set out GHURC's programme area, key projects, and programmed outputs for each site.

Officer response:

Disagree - It is not the role of the JCS to programme regeneration within Gloucester City, this will be pursued through the Gloucester City Plan Development Plan Document.

- Expand the city centre to take in the Western Waterfront areas to the west and north-west.

Officer response:

Noted – The future development of Gloucester will be pursued through the emerging Gloucester City Plan not through the JCS.

- Improve linkages between the city centre, the regeneration areas around the waterfront, and the existing retail facilities at St Oswald's Park.

Officer response:

Noted – These matters will be addressed through the emerging Gloucester City Plan not through the JCS.

- Include Eastern Avenue in proposed regeneration sites.

Officer response:

Noted – This matter will be addressed through the emerging Gloucester City Plan not through the JCS

Cheltenham:

- Focus development on the lower High Street and better link the Brewery development to the town centre.

Agreed – regeneration of this part of town to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. This is being pursued through Cheltenham Development Taskforce.

- Remove the bus stops from the Promenade, to improve the pedestrian environment.
Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS.
- Support specialist shopping areas (e.g. Montpellier and the Suffolks) through provision of nearby street parking.
Agreed – to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. Character Area Appraisal and Management Plans have been produced for a number of areas within the Central Conservation Area. Areas include Montpellier and the Suffolks.
- Make better use of the Honeybourne Line as a sustainable transport route, facilitating non-motorised movement across Cheltenham from the racecourse to the train station.
Agreed – The Honeybourne Line will continue to be protected from development as they can in appropriate circumstances be used as sustainable transport corridors where walking and cycling routes can be installed. To be considered through review of Cheltenham Borough Local Plan not directly through the JCS.
- Ensure new building delivered through the Civic Pride Initiative is of the highest standards of design and sustainability.
Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS
- Regenerate Coronation Square.
Agreed - this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS. The site is included within the Strategic Housing Land Availability Assessment.

Tewkesbury Town:

- Create a Tewkesbury Town Centre Masterplan / Development Framework (as currently proposed).
Officer response:
Agree – this is being produced by Tewkesbury Borough Council, not through the JCS.
- Improve the relationship between the town and its waterways to enhance the leisure and tourism offer.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.
- Enhance the local, friendly, independent feel but improve facilities to enhance and retain retail spending and to improve visitor numbers/duration of stay.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.
- Improve and diversify employment opportunities.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan and the Economic Development Strategy
- Consider a bypass to reduce air pollution/traffic problems.
Officer response:
Noted – Any such scheme would need to be carefully considered in terms of other impacts and funding availability.
- Address the role and scale of commercial development at M5 junction 9.
Officer response:
Noted – This will be considered in the next stages of the Core Strategy.
- Acknowledge the high degree of interaction between communities in Tewkesbury/Northway and those in Worcestershire for work and leisure. This applies particularly to public transport issues, including rail fares and the absence of cross-border bus services.
Officer response:
Noted – this will be considered as part of work allied to the Joint Core Strategy in preparing an Infrastructure Delivery Plan

Rural areas / the wider Tewkesbury Borough:

Issues affecting rural areas and smaller towns/villages are covered throughout this report, but key issues relating to service provision and rural/urban relationships are highlighted here.

Respondents called for the JCS to:

- Avoid focusing on towns/cities at the expense of rural communities.

Officer comment:

Agree – There will be a need for rural areas across the JCS to accommodate some growth as part of the emerging JCS strategy.

- Protect the AONB, Green Belt and productive agricultural land – as detailed in section 13, Sustainability.

Officer comment:

Agree - The JCS seeks to protect the AONB and further landscape designations wherever possible. A Green Belt Review has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester, Cheltenham and Bishop's Cleeve.

- Provide affordable housing – as detailed in section 14, Housing.

Officer comment:

Agree – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- Support the rural economy – as detailed in section 15, Employment.

Officer comment:

Agree – It is recognised that due to the rural nature in parts of the JCS area that specific attention needs to be given to the rural economy. The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area. An Employment Land Review has been produced as part of the JCS evidence base to address the need for and type of employment land across the area.

- Provide new housing only in proportion to the existing settlement, and with reference to social infrastructure provision and the transport network – as detailed in section 14, Housing.

Officer comment:

Noted – The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.

- Ensure adequate provision of social infrastructure and convenience facilities in rural areas to reduce the need to travel – both for the existing population (in the absence of growth) and in response to any proposed development – as detailed in section 14, Housing and section 17, Sustainable urban extensions.

Officer comment:

Agree - The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. The JCS will work towards producing sustainable development and creating new sustainable communities. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.

- Provide better access by public transport to urban centres from rural areas.

Officer comment:

Agree - The JCS will work towards producing sustainable development and creating new sustainable communities.

- Ensure the concentration of new development around urban areas does not suck in capital expenditure on infrastructure to the detriment of investment required to existing infrastructure in the rural hinterland.

Officer comment:

Agree - The JCS will work towards producing sustainable development and creating new sustainable communities. A Sustainability Appraisal of the JCS will be undertaken in order to ensure that urban sprawl is limited and ensure the containment of settlements.

It is important to note that, while many respondents called for the JCS to provide for 'appropriate development' in rural settlements, many respondents also sought to remove specific settlements from consideration for further development – usually on the grounds of: existing over-development; inadequate social infrastructure; flood risk; conservation; poor transport connections; and/or sustainability issues.

16 Sustainable urban extensions

As indicated in section 14, above, respondents were well-informed on housing issues arising from the emerging RSS and in particular on the sustainable urban extensions (SUEs) to Gloucester and Cheltenham proposed in the RSS.

Respondents expressed significant concern over the evidence for and scale of RSS housing targets, and the need for urban extensions. Doubt was cast on the housing growth targets in light of the economic downturn, and support was expressed for environmental conservation in its own right, as well as in response to climate change, flood risk, biodiversity, pollution, food security, character and heritage for example. Several respondents highlighted the lack of adequate Sustainability Assessment on three of the five Areas of Search for SUEs and the resulting likelihood of legal challenge such that these areas should not be considered for development until the issue is resolved.

Respondents called for the JCS to:

- Protect the AONB, the Green Belt, and productive agricultural land.

Officer response:

Noted – Sustainability appraisal, which takes into consideration all landscape and environmental constraints and designations has been undertaken on all the broad locations considered by the JCS in order that members can come to informed choices with regard to the preferred strategic sites for new development over the first 10 year plan period.

- Prevent urban sprawl and the coalescence of settlements.

Officer response:

Agree – The challenge for the JCS is to accommodate new growth around the existing urban centres across the three authorities without causing either urban sprawl or coalescence of settlements. A Green Belt Review has been undertaken in order to provide part of the evidence base for the JCS. A further Green Belt Review will be undertaken.

- Protect the unique character of the area and its settlements.

Officer response:

Agree – Part of the attractiveness of the JCS area is its unique landscape setting from Cotswold escarpment in the east to Severn Plain in the west. It is the role of the JCS to identify areas that can accommodate growth without having an adverse impact on the unique character of the area or its settlements.

- Avoid overwhelming existing transport and social infrastructure with further population growth.

Officer response:

Noted – It will be necessary for any new growth areas to benefit from the relevant physical and social infrastructure. It is intended that an Infrastructure Delivery Plan will sit alongside the adopted JCS.

- Re-use brownfield sites and empty buildings (which benefit from existing infrastructure, services, facilities and access) before greenfield sites.

Officer response:

Noted – In order to provide a mixed supply of size and tenure of dwelling units it will be necessary to allow green field releases alongside the continued regeneration of brown field sites in the urban areas.

- There were some calls for construction of one new town (or major SUE) in preference to multiple SUEs (only if the housing need is proven), and for development of Staverton Airport for housing (the green belt here being viewed as already 'degraded' and connections being good, thus making its development preferable to that of 'untouched' green belt elsewhere).

Officer response:

Disagree: It is necessary to plan for the indigenous growth of Gloucester, Tewkesbury and Cheltenham by providing sustainable extensions to each centre as well as providing for growth in the rural areas. One large new settlement would not be sustainable as it would result in increased commuting to existing areas of local employment. The area to the north of Gloucester City is being considered for public consultation as a Broad Location option.

Respondents were asked to consider what should happen if SUE(s) are proven to be necessary. They called for the JCS to:

- Ensure any SUE provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies (see also section 18, Deliverability and phasing, below).

Officer response - Please see responses to Deliverability and Phasing

- Ensure the necessary infrastructure is in place prior to construction/occupation of housing (see also section 18, Deliverability and phasing, below).

Officer response - Please see responses to Deliverability and Phasing

- Ensure new development is mixed tenure and with a real sense of community, high design/space standards and adequate open space for both people and wildlife.

Officer response:

Noted – In order to be sustainable new strategic developments need to provide a mix of type and tenure of dwellings and need to integrate well with existing communities whilst providing opportunity for community development within the new area. It will be the responsibility of each authority to implement best practice design and space standards within strategic developments in accordance with adopted local development plan policies.

- Ensure SUEs are designed to reduce waste, and equipped to process their own waste.

Officer response:

Noted – The strategic management of waste in the JCS area is led by the County Council via the Minerals and Waste Core Strategy. Developers will need to accord with this Development Plan Document with details of waste management regimes being considered at the master planning stage of each strategic development.

- Provide a full-access Junction 10 if major development goes ahead in northwest Cheltenham.

Officer response - Please see responses to Deliverability and Phasing

The development industry considered that the proposed SUEs have a vital role to play within the JCS area in providing new homes (open market and affordable), social infrastructure and employment opportunities for the well-being of existing and future populations. These respondents drew attention to the requirements of the emerging RSS and the provisions of PPS12 whereby the JCS must conform generally to the RSS.

17 Deliverability and phasing

Developers accepted the need to contribute towards social infrastructure, providing the requirement does not impact so significantly on viability that it precludes the development from coming forward in the first place. Respondents expressed mixed views on the Community Infrastructure Levy (CIL), as follows:

- Impose a standard CIL to provide clarity for developers and local authorities.
- Impose a CIL on development above agreed size thresholds, and incorporate site-by-site flexibility having regard to development viability (e.g. lower tariffs for urban regeneration sites).

- Avoid the Community Infrastructure Levy, instead seeking developer contributions to infrastructure provision on a site-by-site basis, subject to viability and in accordance with national policy.

Officer response:

Whilst comments one and three appear to be contradictory, it should be noted that from April 2014 a local authority will not be able to pool contributions from more than five developments towards provision of infrastructure not being funded by CIL. Therefore securing contributions towards funding provision of, for example, strategic road improvements to cater for increased cumulative traffic generated from development of several sites would not be possible without CIL. However, s.106 may still have an important role to play in relation to the mitigation of certain site-specific impacts and it will remain central in respect of affordable housing (which is exempt from CIL). CIL and s.106 should not, therefore, be viewed as “either/or” in a general sense.

Size thresholds are statutorily incorporated within CIL. The charge cannot apply to development smaller than 100m² gross internal floor area. There are also other forms of statutory “relief” such as apply to charities and social housing.

Whilst within an overall context of economic viability CIL needs to be reasonably flexible and responsive to change, flexibility on a site-by-site basis may defeat a fundamental objective of CIL – to provide greater certainty to the public and developers as to the level of contributions a development will be required to make towards the provision of infrastructure in the area.

Local residents and pressure groups expressed a hard line, calling for the JCS to:

- Impose a levy to direct development to brownfield sites and away from greenfield sites (i.e. impose substantially higher levies on greenfield than brownfield sites).

Officer response:

The phasing of development having regard to the primacy of brownfield or greenfield sites is properly a matter for the strategic policies of the plan. It is not for CIL to introduce different contribution rates by reason solely of such classification since the infrastructure demands of development of a site – whether it is brownfield or greenfield - will not necessarily bear any relation to its status in this respect. Variations in levy charges in different areas or relating to different types of development should be governed primarily by considerations of economic viability.

- Permit reduced charges only in relation to green/biodiversity and community projects.

Officer response:

Noted, but it is essential that the CIL is based upon sound evidence and reasoning. There currently is no obvious objective justification or JCS policy support for differentiation along these lines.

- Secure climate change amelioration measures and renewable energy initiatives as part of planning conditions.

Officer response:

Noted - this is a planning policy issue rather than a matter directly for CIL.

- Ensure all development and infrastructure costs are met by developers, with no cost burden being placed on the three local authorities and ultimately the residents of those areas.

Officer response:

Developers will be expected to make contributions towards the provision of infrastructure both on and off-site as required, and towards mitigation of other impacts of development. But additional sources of funding are likely to be needed to ensure that adequate infrastructure comes forward. This funding will come from a variety of sources including government. It might also be borne in mind that local authorities will receive council tax revenue from new development.

- Ensure new social infrastructure is in place prior to the occupation of new development.

Officer response:

Noted - although the same rationale could apply to physical and green infrastructure.

Phasing was a controversial area. Many respondents expressed a preference for “brownfield first”, and there were calls for the JCS to identify key areas of Gloucester City and Cheltenham as

regeneration areas and to include a suite of policies specific to them to bring forward development schemes.

Meanwhile the development industry called for a flexible approach, and predicted negative impacts of phasing for housing choice and deliverability, as follows:

One respondent quoted the Panel Report for the RSS, which is of relevance to both sides of the debate. It addressed the public's preference for greenfield sites to be reserved "until brownfield sites are exhausted" in the following terms:

18 Flooding

In light of the extreme flood event experienced locally in summer 2007, respondents viewed flood prevention and mitigation as the most important planning issue in the JCS area, and there was a high level of awareness of the challenges involved. While there was consensus on the importance of this issue, there was disagreement over the adequacy of current policies to address it.

Many respondents questioned the effectiveness of existing national policy and called for a "belt and braces approach" in which the JCS would impose flood policies *beyond* those of central government. However, the development industry viewed the current policy and technical assessment framework as adequate, highlighting PPS25's demand that flood risk is considered at all stages of planning, taking into account climate change and sustainable drainage strategies.

Bearing in mind this disagreement, respondents called on the JCS to:

- Support and introduce the Pitt Report recommendations and make reference to the Water Framework Directive (on water quality).

Officer response:

Noted: The Pitt Report contains 92 detailed recommendations. The JCS authorities are working with the County EA and other parties to ensure they are implemented. Where appropriate to a spatial document they will be incorporated, as will requirements of the Water Framework Directive.

- Re-define the flood zones to incorporate local knowledge – and a margin to account for climate change.

Officer response:

Noted – Strategic Flood Risk Assessment Level 2 (SFRA 2) is a detailed piece of work that not only takes account of modelling but empirical evidence i.e. local knowledge of previous floods. All floods will be different however, and small scale/surface water flooding is particularly difficult to predict and will change over time. Further work may be needed on extending SFRA coverage depending on broad locations work. Also as new modelling techniques come on stream then flood maps will need to be updated. Any policy will contain a margin for Climate Change.

- Account for both fluvial and pluvial flooding in flood risk assessment and flood defences (noting that, according to the Pitt Report, one third of the 57,000 homes flooded in 2007 were flooded by surface water, and therefore not necessarily in the floodplain). The Surface Water Management Plan (SWMP) for Gloucester City should therefore be extended to cover the rest of the JCS area for inclusion (alongside Hazard Mapping) in Level 2 Strategic Flood Risk Assessment (SFRA).

Officer response:

Noted - Surface water is notoriously difficult to predict. We must ensure that we are proportionate in terms of the work undertaken. However, Surface Water Management Plans (SWMPs) are now being prepared for Cheltenham, the Tewkesbury, Northway and Ashchurch area, the Bishops Cleeve, Woodmancote and Southam area in addition to the Gloucester SWMP

- Ensure there is no building on the floodplain, and consider a 10-metre easement along flood zones. Some respondents went further, proposing a "managed retreat from the floodplain", i.e. removing existing structures in, or alterations to, the functional flood plain.

Officer response:

Accepted in part – Flood plains are zoned to take account of probability. Certain uses can be built in high probability flood zones. Vulnerable uses however, should not be allowed in high probability flood zones. Managed retreat has been supported by JCS authorities in the past especially on those sites identified in the Shoreline Management Plan for the Severn Estuary. Significant structures have already been removed from the functional floodplain as part of development

proposals in Gloucester and work will continue in this vain. A 10 metre easement while workable on gently shelving flood plains becomes meaningless when topography is more severe. A more sophisticated method of reducing risk could be looked into however,

- Ensure new development does not increase (and should be designed to reduce) flood risk to existing properties.

Officer response:

Noted - Development should not increase flood risk to other properties. There will be occasions where betterment can be negotiated; however, any policy pursuing this will need to be appropriate.

- Ensure water and sewerage infrastructure is in place ahead of any development. Developers must demonstrate adequate on- and off-site water and sewerage capacity to serve their site without affecting existing residents. Where capacity problems are identified, planning permission should only be granted if the developer funds the appropriate improvements for completion prior to occupation of the development. See also section 18, Deliverability and phasing.

Officer response:

Accepted

- Permit the development/expansion of water and sewerage infrastructure where it is needed to serve existing or proposed development, or in the interests of long term water supply and waste water management (provided that the need outweighs any adverse land use or environmental impact, and that any such adverse impact is minimised).

Officer response:

Accepted

- Restrict ground-raising unless it forms part of an approved flood alleviation scheme, or as part of a new development which requires ground-raising to achieve flood resistance measures. In this instance a Flood Risk Assessment must prove that there will be no increase in flood risk elsewhere, and demonstrate how this will be achieved.

Officer response:

Accepted (in areas identified as being prone to flood)

- Demand practical flood prevention measures in new development including:
 - Sustainable Urban Drainage Systems (SUDS). It is important to note that there was considerable disagreement over the effectiveness of SUDS. Supporters claimed they are essential and effective in controlling water flow and improving water quality, providing the correct mix of techniques are employed according to local conditions. Opponents claimed local soil types render SUDS ineffective, and suggested SUDS should only be used if proven successful via on-site testing.
 - Planting, woodland creation and woodland management schemes to control water flow (while simultaneously creating attractive environments, amenity benefits, and aiding biodiversity).
 - Grey water recycling.
 - Mandatory flood resistance and resilience measures in all ground floor extensions and new buildings located in residual risk areas.
 - Restricted permission for conversion of cellars to habitable basements in line with flood risk.
 - Permeable hard surfaces.
 - Upgrading dated, low-capacity or combined sewers.

Officer response:

Accepted in part – SUDS are an effective way of restricting surface water discharge in a manner that does not rely on traditional piped underground systems that can fail and may not deliver capacity requirements. There are also biodiversity and amenity benefits. Different solutions are required for differing lithologies and soil types. The JCS will actively pursue SUDS.

Woodland creation will be supported for a number of reasons including water resource management – Unfortunately with current knowledge we can not rely on it to deliver a measured reduction in flood flow.

Grey water recycling will be supported for wider sustainability reasons in particular water resource management.

Flood resilience measures will be pursued in areas of flood risk

As pointed out by other respondents surface water is the reason for many flood incidences and this will only be exacerbated by an increase in hard surfacing. We will as a matter of course

pursue development that utilizes permeable surfacing as well as green roofs and other means to ensure water is treated in a sustainable manner
We will seek advice from Severn Trent and where appropriate negotiate on their behalf on issues of combined and under capacity sewers.

- Incorporate River Severn Catchment Flood Management Plan policies.

Officer response:

Accepted where relevant to a spatial planning document. Note: Much of Gloucester is covered by the Severn Tidal Tributaries CFMP

- Consider producing a Water Management Supplementary Planning Document (SPD). Several respondents called for Tewkesbury Borough Council to adopt the draft Flood and Water Management SPD prepared by the Severn and Avon Flood Group. This is noted here while drawing attention to the legal requirement of PPS12 that communities must work with the Local Planning Authority (LPA) and should not expect to prepare plans independently and have them adopted as SPD.

Officer response:

Accepted in part – some SPD that covers water management may well be appropriate

- Consider producing a full Water Cycle Study as part of the evidence base.

Officer response:

Accepted in part – A full blown water cycle study would be cost prohibitive. However, there is a great deal of material currently available which is being brought together for the purpose of the JCS including the SFRA Level 1 and 2 along with the aforementioned SWMPs.

- Consider including dedicated policies covering water quality and land contamination.

Officer response:

Noted

Many respondents expressed concern over the possible development of specific sites, detailing their experiences of flooding on the sites and highlighting the anticipated impact of development on neighbouring properties. Areas flagged for concern include all the RSS Areas of Search for urban extensions and more besides: Leckhampton, Shurdington, Warden Hill, northwest Cheltenham, north of Brockworth, north of Gloucester / the A38 corridor, south of Gloucester, Minsterworth and Elmstone Hardwicke.

Officer response:

Noted - All previous RSS sites have been subject to a Strategic Flood Risk Assessment Level 2. This is a detailed piece of work that uses the most up to date modelling available and empirical evidence. No site should come forward that is at risk of flood unless it can be demonstrated that it passes the sequential test (and exception test if appropriate). It must also be demonstrated through a detailed site specific Flood Risk Assessment that it does not increase the risk of flood elsewhere and that flood resistance and resilience measures can sufficiently mitigate the risk.

Many respondents also expressed concern over maintenance of flood defences, dredging etc, highlighting the importance of: regular maintenance by riparian land-owners and/or the Local Authority; setting clear roles and responsibilities for those involved; and robust enforcement. This is an operational issue, outside of the JCS remit, but is noted here for completeness.

Officer response:

Noted - but not an issue for a spatial plan other than to avoid problems of silting and blocked culverts in new development. As such a SUDS policy will be pursued

19 Green infrastructure

Protection of green spaces was a high priority for the majority of respondents. The Green Infrastructure approach to the management of open spaces was endorsed by many: connecting and managing all green spaces for free access and multi-functional use by all. Respondents called for the JCS to:

- Protect and promote the positive management of: the AONB (with reference to the Cotswolds AONB Management Plan), Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces.

Officer response:

Agree – The JCS seeks to protect the AONB and all existing POS across the three authorities. A green belt study has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester.

- Promote and secure improved access to all of these spaces (acknowledging the pressures imposed by public access, and accepting that some areas may need protection/limited access, for example dog-walking restrictions in areas with ground nesting birds).

Officer response:

Agree – With caution the green infrastructure strategy will attempt to connect people with green space. Improved access will be a component but it has to be recognized that the vast majority of land is in private ownership and managed for a purpose with often limited access.....

- “Green” the existing urban fabric where possible.

Officer response:

Agree - GI strategy will aim to preserve and enhance green spaces within urban areas

- Support the establishment of a new regional park.

Officer response:

Support welcomed

- Provide new and complementary, linked habitats and green spaces in the Severn Vale.

Officer response:

Agree - Part of the raison d'être of the Regional Park will be to support the creation of linked complimentary habitats and green spaces in the central vale

- Provide a mix of formal and informal open spaces.

Officer response:

Agree – a mix will be encouraged

- Support the provision and expansion of allotments, community orchards and community composting (linked to local food schemes, see also section 13, Sustainability).

Officer response:

Agree with caution – Allotments, Community orchards and related land uses will be supported. While composting schemes and linkages to local food networks is to be supported it may not be best pursued through the JCS

- Promote biodiversity and habitats (through a dedicated set of policies, not as an add-on).

Officer response:

Agree- The protection and promotion of habitats and linkages between them will be a component of any policy stance on biodiversity

- Set a high standard for open space design and landscape treatment and provision of wildlife habitats in new developments. Ensure that 'green spaces' provided by developers are adequate and usable (not token gestures on undevelopable land) and contribute to a green network.

Officer response:

Agree with caution - high standards will be set and the norm will be to ensure green spaces are adequate and useable and preferably bio diverse. However, there will be exceptions and the Government is experimenting with biodiversity off-setting, while no decision has been made on this, it may be something the JCS authorities in the JCS may wish to pursue.

- Address the business opportunities associated with Green Infrastructure and links with an emerging greener economy.

Officer response:

Agree – Investment gravitates to quality environments and it will be incumbent on the JCS generally to ensure that the quality environment currently experienced is preserved and enhanced. With regard to strategic green infrastructure the economic benefits from 'wildlife tourism' and related activity are well known and will be promoted.

- Retain access to the countryside for existing communities on the urban-fringe.

Officer response:

- Maintain footpaths/rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces.

Officer response:

Agree – GI strategy will support informal and formal rights of way as a means of accessing the wider countryside. We will work with developers and organizations such as Sustrans to ensure cyclists are better catered for

- Support farmers as “the guardians of the countryside”.

Agree with caution – While we would support farmers as guardians of the countryside, in the past 50 years agricultural intensification has resulted in loss of landscapes and biodiversity. Farmers need the right framework to allow them to farm the land profitably but in a manner that does not degrade environmental capital. The JCS will support farmers where it can achieve this objective

- Support the provision of green burial sites.

Officer response:

Agree in principle. - This is something not previously considered but given the general positive benefits then it is something to be encouraged.

20 Site-specific recommendations

PLEASE NOTE: The following site-specific recommendations are presented for information, in no particular order, summarised from information supplied by respondents, and without prejudice to policies in the JCS or to any future planning applications:

Cheltenham urban area

- Lower High Street – in need of regeneration

Cheltenham Development Taskforce is looking at ways of improving linkages in a number of areas in the town centre. One of the ideas is linking the High Street to the Brewery making it easier to walk between the two. This will be a starting point for raising the long term economic performance of this area. The Supplementary Planning Document “Lower High Street Character Area Appraisal and Management Plan” was produced for the area.

- Car parks north of the town centre – suitable for high density housing, multi-storey parking, and office use, no retail

North Place and Portland Street car parks are allocated sites for mixed use development in the Cheltenham Borough Local Plan. This forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. Existing Civic Pride Urban Design Framework (December 2010) SPD and North Place and Portland Street Development Brief cover the site. The site is included within the Strategic Housing Land Availability Assessment.

- Land at the Hayloft, Cheltenham – suitable for housing development if exceptional circumstances for Green Belt development can be proven

The site is included within the Strategic Housing Land Availability Assessment.

- Land at Badgeworth Road, Cheltenham – suitable for mixed-use development if exceptional circumstances for Green Belt development can be proven

The site is included within the Strategic Housing Land Availability Assessment.

- Land at Swindon Lane, Cheltenham – part of Hunting Butts Farm application. Suitable for housing development if exceptional circumstances for Green Belt development can be proven.

The site is included within the Strategic Housing Land Availability Assessment.

- Hunting Butts Farm, Cheltenham – suitable for housing development

The site is included within the Strategic Housing Land Availability Assessment.

- Blakeway/Berry land, Cheltenham – suitable for housing development

Noted

- Briarfields – suitable for housing/mixed-use development

The site is included within the Strategic Housing Land Availability Assessment.

- Cheltenham bus station – suitable for regeneration as mixed-use / entertainment area

The site forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. A Development Brief was produced for the site. The site is included within the Strategic Housing Land Availability Assessment.

- Land at Badgeworth Road, Cheltenham – suitable for employment uses
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Prestbury – suitable for housing development
The site is included within the Strategic Housing Land Availability Assessment.
- Northwest Cheltenham – suitable for mixed-use, residential and employment development
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Hyde Farm, Cheltenham – suitable for housing development
The site is included within the Strategic Housing Land Availability Assessment.

Gloucester urban area

- All GHURC sites – suitable for mixed-use development
Officer response:
Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.
- Kings Quarter – suitable for mixed-use development
Officer response:
Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.
- Land at Naas Lane – suitable for employment development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- The Knoll, Stroud Road – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan
- Helipebs (Holdings) Ltd land at Sisson Road – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Corncroft Lane, Matson – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Sylvanus Lyson's Charity land at Hempsted – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Hempsted Lane – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Gloucester Railway Triangle – suitable for a new prison
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. The northern railway triangle is currently the subject of a mixed use planning application. At the time of writing this response the application has

not been determined. The site lies within a larger area the subject of an adopted Development Brief.

- Gloucester Railway Triangle and Great Western Road Yard – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. These sites lie within a larger area the subject of an adopted Development Brief.

- Site SUB17 – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Winneycroft Farm – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Elmbridge and Pirton Court – suitable for housing, mixed-use, park and ride, transport hub

Officer response:

Noted – This site lies within Tewkesbury Borough and was identified in Local Transport Plan 3 as a possible location for a transport interchange including a Park and Ride and 'Parkway' train station for both Gloucester and Cheltenham

- Eastern Avenue/Barnwood – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Bristol Road/Olympus Park/Waterwells – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Gloucester Business Park – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

Tewkesbury urban area

- Northway – suitable for retail park, e.g. Ikea

Noted - Land at Northway may be suitable for some small scale retail development to serve residents of the area, however in line with national policy large scale retail development is more appropriately situated within or adjacent to town centres to aid access by a choice of means of transport. The location of any large scale retail park will be considered as part of the Joint Core Strategy.

- Ashchurch MOD base (if closed) – suitable for employment development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Any redevelopment of large brownfield sites will be assessed in terms of its ability to contribute to sustainable communities

- Mythe land – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.

- Mitton land – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.

- Wingmoor Farm – to be returned to community use as public open space

Noted - The remediation and landscaping of land at Wingmoor Farm after it's close as a landfill site will be dealt with by the County Council as the waste planning authority. However, the long term use of Wingmoor Farm as a landfill site is being pursued by the Gloucestershire Waste Local Plan currently being developed by County Council.

- Tewkesbury/Northway – suitable for mixed-use development, subject to the caveat that any development should not extend to the east beyond the B4079 at Aston Cross or impact on the settlement of Pamington

Noted – Development at this location together with potential impacts on the landscape will be considered as part of the Joint Core Strategy.

- Land at Tewkesbury Park Fields (Lincoln Green Lane) – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Land at Lincoln Green Lane falls within the registered battlefield boundary.

- Land at Tying House – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

- Land at Banady Lane – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

- Land at Banady Lane – suggested for designation as Important Open Space

Officer response:

The inclusion of land as important open space will be in later stages of Tewkesbury's development plan

- Land at Two Hedges Road – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan. This land also falls within the Green Belt and development of this site would need to be assessed against emerging policy.

- Land at Stoke Orchard (Coal Research Establishment) – suitable for mixed-use development
Officer response:
This site is the subject of a current planning application for mixed use development.
- Land south of Bredon Road – suitable for housing development
Officer response:
This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

21 Recommended reading

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Building for Life
- CABE/RIBA space standards
- CPRE, Affordable Rural Housing Commission report: A sustainable future for rural affordable housing?
- Study into the Environmental Impacts of Increasing the Supply of Housing in the UK, April 2004
- UK Low Carbon Transition Plan:
www.decc.gov.uk/en/content/cms/publications/lc_trans_plan/lc_trans_plan.aspx
- England's Trees, Woods and Forests - Delivery Plan 2008-2012: www.forestry.gov.uk/etwf
- Woodfuel Strategy for England: www.forestry.gov.uk/england-woodfuel
- Meeting the Housing Requirements of an Aspiring and Growing Nation
- Cotswolds AONB Management Plan
- Local Quality of Life Indicators - Supporting Local Communities to Become Sustainable, Public Sector National Report, AC August 2005
- Safer Places - The Planning System and Crime Prevention (ODPM/Home Office, 2004)
- www.securedbydesign.com
- www.saferparking.com
- UK Low Carbon Transition Plan
- 2008 Survey of Renewable Electricity and Heat Projects in South West England
- The Taylor Review, 2008
- Better Places to Play Through Planning, Play England
- Exemplar sustainability policies: Uttlesford District Council's policy for off-setting carbon emissions of extensions, Milton Keynes' 'Tariff', and Merton's 'Rule'
- Research by Cycling England: www.dft.gov.uk/cyclingengland/site/wp-content/uploads/2009/03/planning-for-cycling-report-10-3-09.pdf
- Department for Transport on the costs/benefits of cycling: <http://live-webtag.dft.gov.uk/documents/expert/unit3.14.php#057>
- Friends of the Earth's *Get Serious about CO2* campaign:
www.foe.co.uk/campaigns/climate/get_serious/index.html

Joint Core Strategy Consultation Response Report

D. Part 1 Online Consultation

22 Purpose of the online consultation.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

23 Summary of responses received

Spatial Portrait

Seven responses received (17%) were in full support of the Spatial Portrait. Only one respondent disagreed with the Spatial Portrait and the majority of respondents sought clarification on specific issues or suggested alternative wording.

The following were highlighted for further consideration in future drafts of the Spatial Portrait:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Include the canal corridor, River Avon and the Green Belt as key features of the JCS area.

Officer response:

Noted.

- Provide more detail on regeneration initiatives and their objectives – e.g. the Tewkesbury Town Centre Masterplan, GHURC and Civic Pride.

Officer response:

Noted – The JCS recognise the importance of the regeneration initiatives, although repetition of existing documents should be prevented. Cross referencing could be used to prevent repetition.

- Give consideration to the hierarchy of settlements e.g. Bishops Cleeve and Winchcombe were described by respondents as main settlements in the JCS area and were compared to Brockworth and Churchdown in terms of scale/services, while clarity was requested over the term Tewkesbury/Northway.

Officer response:

Noted – The hierarchy of settlements will be re-considered. Further justification should be provided should a settlement not be included as a main settlement.

- Consider the strategic role and future of Gloucestershire Airport.

Officer response:

Noted.

- Concern was expressed that statements on population, employment, employment land, households, skills, crime etc, must be backed up by evidence.

Officer response:

Agree – The JCS have an evolving evidence base which will support and influence the core strategy and development management policies.

Key Issues

Four of the forty respondents fully agreed with the Key Issues and only two respondents disagreed. A majority of respondents (85%) sought clarification on specific issues or suggested alternative wording.

Comments applying to all Key Issues are summarised, followed by comments that were specific to particular Key Issues:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Consider the prioritisation of issues and objectives.

Officer response:

Noted.

- Include community safety (crime and fear of crime) and the need for cross-boundary working as key issues.

Officer response:

Noted.

- Consider the evidence provided in the South West Regional Spatial Strategy and West Midlands Regional Spatial Strategy.

Officer response:

Agree – The evidence base behind the RSS's can be beneficial to the JCS even if the proposed outcomes were not supported locally.

Key Issue A – Risk of lack of self-reliance and complementarity between settlements

- Editorial comments only.

Key Issue B – Regeneration of urban areas

- State the importance of this historic environment and identify opportunities for regeneration outside of urban centres in 'other parts of built-up areas'.

Officer response:

Agree – The JCS recognise that there are opportunities for regeneration outside of urban centres. The rural strategy will help identify these issues.

Key Issue C – Regeneration of urban areas

- Emphasise the distinctiveness of the local economy.

Officer response:

Agree – The JCS recognise the importance of the local economy and believes there are opportunities to emphasise this within the core strategy.

Key Issue D – Increasing demand for housing and particularly affordable housing

- Consider the difference between housing 'need' and 'demand' (in accordance with strategic objective 3, housing)

Officer response:

Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.

- Refer to the County Council's housing/population projections.

Officer response:

Agree – Gloucestershire County Council have prepared population and household projections which will establish future need. These results will contribute to the data required within the econometric model which will test affordable housing criteria across the JCS area.

- Refer to accommodation for students, families and the elderly.

Officer response:

Agree – The JCS recognise the importance for all members of society to have access to a decent home.

- A conflict was highlighted between respondents who want 'brownfield sites to be redeveloped before Greenfield sites', and respondents who believe that adequate brownfield capacity does not exist so peripheral 'major growth locations' must be considered with a view to securing associated infrastructure improvement.

Officer response:

Noted – In order for the JCS to create a 'sound' plan, additional sites on the periphery of existing built up areas will be required to meet the requirements of the future populations.

Key Issue E – Low skills and poor education attainment

- Refer to apprenticeships, higher education and the high calibre of schools in the JCS area.

Officer response:

Noted.

- Use 'Disparity in skills and educational attainment' as an alternative description.

Officer response:

Noted.

Key Issue F – Job provision, lack of employment and economy

- Refer to apprenticeships and the distinctiveness of the local economy.

Officer response:

Noted.

Key Issue G – Deprivation

- No comments received.

Key Issue I – Public transport and congestion

- Refer to home working and expansion of broadband provision.

Officer response:

Agree – The JCS recognise that working arrangements have changed and more people are deciding to work from home. In order to allow this to be an option to all, broadband infrastructure should be available to all communities in the JCS area.

- Refer to the possibility of an ultra-light railway connecting Gloucester and Cheltenham.

Officer response:

Noted.

Key Issue J – Flood Risk

- Refer to risk from both pluvial and fluvial flooding, and to the risks associated with development on or close to high flood risk areas.

Officer response:

Agree – The JCS recognise the sensitivity of flooding in the JCS area following the 2007 floods. The location of development will be subject to the tests within PPS2 and the SFRA2 will also identify complex flood risk assessments for some broad location sites.

Key Issue K – Risk to natural environment assets.

- Refer to the Green Belt.

Officer response:

Noted – The Green Belt review will identify areas of the Green Belt which perform well and less well to the functions set out in PPG2.

Key Issue L – Climate Change

- Refer to the reuse and adaptation of heritage assets (in accordance with PPS5).

Officer response:

Noted.

Key Issue M – Provision and protection of cultural, leisure and tourism offers

- Refer to major sporting facilities such as Cheltenham racecourse.

Officer response:

Noted.

Key Issue N – Providing for inclusive communities.

- No comments.

Vision

Six of 41 respondents agreed with the Vision and two respondents disagreed. The majority of respondents (80%) sought clarification on specific issues or suggested alternative wording.

- Achieve a better balance between urban and rural issues.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Include the Green Belt, affordable housing, education, employment, rural public transport, agriculture/forestry and the need to sustain rural services as key elements of a Vision for the JCS area.

Officer response:

Noted.

- Consider the status/hierarchy of settlements.

Officer comment:

Agree – A rural strategy will be prepared alongside a settlement audit. This will enable the JCS to identify suitable levels of development within the rural areas.

- Consider the difference between housing 'need; and 'demand' (in accordance with Strategic Objective 3, housing).

Officer response:

Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.

- Refer to the value of the existing natural and built environments in attracting business investment/job creation.

Officer response:

Agree – The JCS area is a pleasant and attractive part of the country which should be emphasised within the JCS to attract future investment and new development.

- Refer to opportunities for improved bus/coach routes and better rail services with stations redeveloped to become destinations and add capacity.

Officer response:

Noted.

- Refer to flood prevention, drainage maintenance, flood management and locally generated green energy.

Officer report:

Noted – Such details will be referred to in more detail within the JCS development management policies and the supporting evidence base.

Strategic Objectives

Four of the forty-one respondents fully agreed with the Strategic Objectives and one respondent disagreed. The majority of respondents sought clarification on specific issues or suggested alternative wording.

General comments which apply to all Strategic Objectives are summarised first, followed by comments that were specific to particular Strategic Objectives.

- Achieve a better balance between urban and rural issues. Specifically, investment in agriculture, increased agricultural output and increased/secure local food production were all suggested as key Strategic Objectives for the JCS area.

Officer response:

Noted.

- Include green energy generation as a Strategic Objective.

Officer response:

Noted.

- Consider the deliverability of the Strategic Objectives in light of the current economic climate.

Officer response:

Noted – although the economic climate is likely to change over the 20 year plan period.

Strategic Objective 1 – Regeneration

- Consider regeneration outside, as well as inside, core urban centres (including villages and rural settlements) and uncertainty of investment resulting from the current economic climate.

Officer response:

Agree – The rural strategy and settlement audit will help identify which areas are capable of enabling additional future development.

- Monitor investment into deprived wards and evaluate the impacts to help direct subsequent initiatives.

Officer report:

Noted.

Strategic Objective 2 – Jobs and Economy

- No comments received.

Strategic Objective 3 – Housing

- Refer to the provision/improvement of infrastructure (including transport, social, green, etc) through new housing development and to catering for the disabled community.

Officer response:

Agree – Infrastructure provisions will be required with any development to assist the new and existing communities.

- Several respondents suggested that redeveloping brownfield sites before Greenfield sites should be a Strategic Objective. Other respondents suggested that urban areas do not have capacity for the necessary homes and employment, so a phased approach including development of peripheral 'major growth locations' should be considered with a view to securing associated infrastructure improvement.

Officer response:

Noted – It is likely that strategic developments within the JCS will be phased to ensure that adequate infrastructure is provided.

Strategic Objective 4 – Skills and Education

- No comments received.

Strategic Objective 5- Access to services and healthcare

- Refer to the disabled community as a special interest group.

Officer response:

Noted.

Strategic Objective 6 – Transport

- Refer and give prominence to the M5 as a strategic gateway.

Officer response:

Noted.

- Include the improvement of public transport in rural areas (to reduce private car usage) as a Strategic Objective.

Officer response:

Noted – LTP3 will focus on this issue in more detail. However, the JCS recognise the importance for all communities to have access to public transport.

Strategic Objective 7 – Flooding

- Prohibit development on flood plains, or on areas likely to flood, or on areas which might prompt flooding elsewhere, considering both fluvial and pluvial flooding.

Officer response:

Agree – The JCS will ensure that suitable flood mitigation measures are considered when developing in flood risk areas. In addition, the tests set out in PPS25 should be adhered to and the evidence within SFRA2 can assist with FRA's.

- Integrate flood planning with planning of the natural environment/land management to reduce and mitigate the effects of flooding – e.g. plant woodland uphill or housing to reduce run off.

Officer response:

Noted.

Strategic Objective 8 – Natural Environment

- Refer to the Green Belt and ensure language is in accordance with PPS5.

Officer response:

Noted.

Strategic Objective 9 – Climate Change

- No comments received

Strategic Objective 10 – Culture, Leisure and tourism

- Refer to the areas world-class sporting and cultural festivals and to the canal corridor.

Officer response:

Noted.

General Comments

60 responses were received under General Comments. Responses covered a range of issues from spelling and grammar, additional wording and more specific issues and topics which were considered important to the *Part 1* document.

- Provide explanation of the evidence that has informed Part 1.

Officer response:

Noted.

- Explain how the Vision and Strategic Objectives will be delivered, by whom and when (particularly in light of the current economic climate and public sector funding cuts).

Officer response:

Noted.

- Achieve a better balance between urban and rural issues.

Officer response:

Agree – the rural strategy will create a better balance in the JCS and will consider all areas within the JCS area.

- Promote the M5 corridor as the areas major transport link to the rest of the UK. Support the provision of a new train station between Gloucester and Cheltenham.

Officer response:

Noted – LTP3 focuses on these issues in more detail. The JCS are preparing an infrastructure delivery plan which will identify future infrastructure requirements to assist an increasing population.

- A large number of respondents expressed concerns over the future of Bishops Cleeve and land at Leckhampton/Shurdington which were identified as Areas of Search for Sustainable Urban Extensions in the South West Regional Spatial Strategy. Such responses sought to protect these areas from development due to concern for Green Belt, flooding, traffic and landscape issues, for example.

Officer response:

Noted – all of these issues will be considered when potential Broad Locations are identified.

- The permanent line of parked buses along the Promenade is inhibiting and should be removed and the Promenade paved as pedestrian area, restoring what is now a congested traffic route to a major public space.

Officer response:

The relocation of the bus terminals are being considered as part of Cheltenham Development Taskforce.

- Traffic congestion and pollution in the entire JCS area can be tackled by balancing existing communities, rather than creating new balanced communities. The existing ones should be given adequate provision of green transport facilities.

Officer response:

Noted. Financial provisions from new developments can contribute to new and existing infrastructure. The JCS will ensure that infrastructure provisions and community facilities are inter-connected to create vibrant balanced communities.

- Reference is made to the considerable identified need for homes, especially affordable homes across the JCS, yet there is no evidence to back this up.

Officer response:

Noted – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- The location for new homes cannot be made entirely within the existing urban areas. The issue should recognise that the most sustainable locations for growth at the required scale will include peripheral urban extension locations, including land at Tewkesbury.

Officer response:

Agree – Due to the urban capacity of the built up JCS areas, it is recognised that peripheral development would be required to accommodate the future populations. The strategic development scenarios which will be consulted upon in the developing preferred options

consultation will illustrate broad locations which will form strategic developments across the JCS area.

- The flood and water management proposal provided by the Severn and Avon Valley combined Flood Group should be used as a Supplementary Planning Design document across the JCS area.

Officer response:

Noted – Any supplementary planning documents will be published following the JCS. At this stage of the JCS it has not been agreed which and how many supplementary planning documents will be required to support the JCS and its core policies.

- Is the impact on green belt different if houses were attached to the village rather than an urban extension?

Officer response:

Noted – The Green Belt Study for the JCS area will identify which areas of the Green Belt are most and least achieving the five purposes which are set out in PPG2. This will help establish if those areas on the edge of existing built up areas contribute significantly to the purposes of the Green Belt.

- The document is superficial, the issues identified were meaningless and that the JCS is merely treading water and filling a gap as the LDF cannot move forward without clear guidance. This is just a stop gap to deal with current housing applications.

Officer response:

Noted – The JCS will replace the policy void following the abolition of the RSS. The JCS is now required to identify future housing/employment sites for the next 20 years based upon local need and a supporting evidence base.

- Climate Change - Although volume house builders have a responsibility to devise and develop layouts and dwelling types that are able to make a positive contribution towards a low-carbon future, the local authority should seek to have a more reconciliatory stance to resolving local issues sharing best practice and 'gap funding' renewable energy projects where applicable (i.e. Combined Heat and Power Systems).

Officer response:

Noted – Such issues will be considered and encouraged in development management policies.

24 Recommended Reading

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Cheltenham Festival's Annual Review
- Gloucestershire County Council's Research and Intelligence Unit Population Report
- Circular 04/2007: Planning for Travelling Showpeople
- PPS5: Planning for the Historic Environment
- Policies for Spatial Plans section 4.3 – Planning Officers Society, 2005
- Strategy for England's Trees Woods and Forests
- UK Biodiversity Partnership, 'Conserving Biodiversity in a changing climate: guidance on building capacity to adapt' (2007)
- Natural Environment and Rural Communities Act 2004
- DEFRA's guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007).

E. Outcomes of Consultation Activities

24 Common ground and competing viewpoints – Issues and Key Questions

The consultation has highlighted an incredibly broad range of issues – both complementary and competing – which the JCS must seek to balance in accordance with best planning practice and the requirements of PPS1 *Delivering sustainable development*. Key areas of common ground and disagreement include but are not limited to the following:

Common ground

- Support for the principal of joint working between the three JCS authorities and cooperation with neighbouring authorities.
- The need to prepare for, adapt to, and mitigate the impact of climate change – particularly with regards to flooding – and to secure socially, economically and environmentally ‘sustainable development’.
- The need to address and improve rural and urban areas in a balanced way.
- The need to provide adequate social infrastructure, transport, jobs and services for existing populations and any new development.
- The need to plan for employment, education and training for a secure economic future.
- The need to address inequalities in wealth, housing, education, employment and infrastructure provision.
- The need to link any housing development to employment and to local housing need (e.g. families and the elderly).
- The need for high design and energy standards in all aspects of development, at all scales, from the proposed urban extensions to street furniture.
- The need to provide good access to the countryside and green/open spaces – and the Green Infrastructure approach as one of a suite of methods to help secure it.

Competing viewpoints / areas of tension

Sustainability	
The need to secure socially, economically and environmentally ‘sustainable development’.	Widely differing definitions of what is ‘sustainable development’.
Strong support for the principal of sustainable energy generation.	Significant opposition to visible/intrusive sustainable energy sources, particularly in rural areas or the AONB.
<p>Calls to reverse the decline of rural settlements and secure sustainable rural communities – without compromising their character.</p> <p>Concern for demographic change in rural areas (the pricing-out of young families).</p>	<p>Rural settlements’ vicious circle of declining services/employment, poor transport connections and ageing populations – all contributing to a common view that these are not sustainable locations for development.</p> <p>Frequent opposition to any significant rural development; and the failure of small-scale development to secure population thresholds large enough to support the desired local services.</p>
National and regional planning	
Perceived inadequacies in evidence for the growth levels (and SUEs) set out in the RSS, and resulting calls for the JCS to stand firm in opposition to central growth targets.	Statutory requirements for the JCS to be in accordance with national and regional planning policy.
Calls to provide for local community needs, not regional housing targets.	Population mobility, a free market in housing, and the JCS area’s continued appeal to residents of other towns and regions.

Perceived inadequacies in the floodplains defined by the Environment Agency (EA) following local experiences in 2007.	Statutory requirement for the JCS to work with the EA and EA data.
The housing market	
<p>Strong concern for housing affordability.</p> <p>Calls for the conservation of natural/built environments, and brownfield-before-greenfield development.</p> <p>Cynicism for the profit motive of developers.</p>	<p>Perception that housing need cannot be accommodated on brownfield sites alone.</p> <p>Calls for the phased development of brown/greenfield sites to ensure housing delivery, affordability and choice.</p> <p>Technical and financial constraints on the development of brownfield land.</p> <p>Likely continued growth in housing demand, primarily resulting from the UK's historic failure to build adequate new housing, plus the decline in household size and longer life-expectancy.</p>
The negative impact of the current recession on development activity/viability and housing demand.	The long-term view of the JCS to 2026, covering multiple economic cycles.
<p>Calls for the provision of family housing in preference to flats.</p> <p>Calls for the conservation of urban and rural character and heritage.</p>	<p>Calls for higher density housing in urban areas to deliver more housing per unit area.</p> <p>The perceived suitability of urban brownfield sites for flatted development.</p> <p>The perceived suitability of urban-edge greenfield sites for family housing development.</p>
Calls for limited development of affordable, family housing in rural areas for local people – e.g. 10-20 houses per village was commonly cited.	<p>The need to provide affordable housing through development of market housing.</p> <p>Frequent opposition to any significant rural development.</p> <p>Misperception of the amount of housing such a strategy would deliver (e.g. if averaged across the 65 settlements in Tewkesbury Borough, only 650-1,300 new dwellings would be provided for a population of more than 300,000).</p> <p>Population mobility, a free market in housing, and the JCS area's continued appeal to residents of other towns and regions.</p>
Historic failure to address the needs of Gypsies and Travellers, and their right of access to social infrastructure.	Historic concern from the settled community for the location and concentration of sites, and the impact on areas of environmental designation.

25 Common Ground and competing viewpoints – Part 1 Online Consultation

The consultation revealed little objection and some support for the materials presented. However, a broad range of issues were put forward for further consideration and a substantial number of specific clarifications and suggestions were made which the JCS team must seek to balance in accordance with best planning practice and the requirements of PPS1, Delivering Sustainable Development.

From the 297 comments received, 60% did not offer specific support or opposition to a concept, but instead answered 'Other' and frequently provided further commentary. There will be another opportunity to comment on the JCS Part 1 in the *Developing Preferred Options* consultation in December 2011.

The most common issues raised include:

- The need to balance rural and urban issues and ambitions.
- The need to promote the positive features of the area as well as addressing the negative.
- The need to provide a clear hierarchy of settlements.
- Concern for flooding, heritage and environment issues.
- The need to base Part 1 on clear evidence. It should be noted in response to this point that all evidence will be provided in supporting documents but not within the constituent sections of Part 1 which are intended to provide succinct and readable summaries of that evidence, not the evidence itself.

26 Consultation Activities in 2011

Following the *Issues and Key Questions* and *Part 1* consultations, the JCS team have been undertaking many consultation activities in preparation of the *Developing Preferred Options* Consultation. The details below give an indication of the additional consultation events which have taken place during 2011.

Event	Audience	Outcome
Cross Boundary Programme Board (monthly meeting)	JCS Chief Executives & Strategic Directors	JCS updates and decision making.
Members Steering Group seminars	Elected members	JCS updates.
Parish Council seminars/meetings	Parish councillors	Question and Answer session on the progress of the JCS.
SHLAA site assessment panels	Housing Market Partnership	Discuss the site assessment summary, general SHLAA and the housing trajectory.
Broad Location developer meetings	Various developers, consultancies, land owners and specific consultees.	Discussion of broad location sites.
Three Bridges Neighbourhood Partnership	Members of three Bridges Neighbourhood Partnership	Discussion about the JCS in the context of Gloucester City Plan consultation.
Member training sessions	All elected members and MP's across the JCS area.	Discussed emerging evidence base for the JCS – Green Belt Review, SHLAA and SFRA2.
External meeting	Cheltenham Local Strategic Partnership	Briefing on JCS activities and update on key milestones.

Tewkesbury Borough Council	Elected Tewkesbury Borough members	Question and answers with members on the JCS.
Matson and Robinswood Neighbourhood Partnership	Members of the R&M NP	Discussion about the JCS in the context of the Gloucester City Plan consultation.
Parish and town council presentation	Members	Raising awareness of the JCS and its progress.
External meetings	Leg Lag and Save the Countryside	Update of the JCS
Meeting with Gloucestershire Rural Community Council	Officers of GRCC	Advised of JCS autumn/winter consultation and requested GRCC assistance and expertise in engaging with rural communities during consultation.
Meeting with political groups	Elected members	Discuss the emerging proposals for the JCS.
JCS newsletter	Elected members and general public	Update of the JCS

27 Next steps

The JCS team are analysing this report alongside all other evidence gathered with a view to developing options, for further public consultation in December 2011. The consultation is anticipated to include a revised Part 1 and will identify Broad Locations for development around the periphery of existing urban areas.

A rural strategy and settlement audit will also be prepared to address the rural communities within the JCS area.

28 Lessons learnt

Observation	Lesson learnt / outcome
Event locations and attendance	
Need to maximise attendance and ensure a range of communities are reached	<p>Ongoing review of all event locations. Consider including new areas – e.g. Barton in Gloucester</p> <p>Outdoor exhibitions (Cheltenham Promenade and Gloucester Kings Walk) were popular, however time of year and weather should be considered when choosing venues</p>
<p><i>Public</i></p> <p>Some complaints received regarding notice period for events and meetings</p> <p>Attendance at events was often poor after 7pm</p>	<p>Endeavour to provide more notice, and to maximise publicity (see below)</p> <p>Review opening times to ensure efficient use of Officer time and make the exhibitions as effective as possible. E.g.</p>

Some exhibitions benefited from 'passing trade' attracted by other events happening at the same time and location	public exhibitions to close at 7pm, rather than 8pm Consider specifically piggy-backing other events to increase attendance and share costs where possible. This principle particularly applies to other public consultation events that may be happening in the JCS area
<i>Members</i> Need to maximise attendance by Members Better response obtained from Members by letter than email	Continue to maintain up-to-date list of all Council meeting dates and plan consultation events accordingly Inform Members of JCS process and activities by letter – consider duplicate email clearly flagged as such
Security: One meeting of the Member Steering Group was attended by uninvited members of the media	Provide list of invited attendees and check attendance on the day to ensure media contact is managed appropriately by the CBC Communications Team
Publicity	
Several Parish Councils provided excellent publicity promoting local exhibitions (at no cost to the JCS team)	Provide adequate notice and encourage Parish Councils to promote events in all correspondence. Where Parish Councils do not exist, Members could play a vital role
Coverage in the press was good and needs to be maintained	Continue to work with all local media
Resources and materials	
Some exhibitions were initially over-staffed, making it difficult for visitors to approach the stand and engage. Officers were sent home accordingly, leaving adequate cover, but this could be improved. Staff observed a cycle where more interest was attracted when people were seen talking to officers, and less when 'spare' officers were waiting for interest	Ongoing review of staffing to ensure efficient use of Officer time and to maximise the exhibition's appeal to the public. As a rule, stands need a maximum of two officers, or three in the busiest locations (G/C/T town centres) at the busiest times (Saturday lunchtime / afternoon)
Having a variety of means to get involved proved very popular with the public. Post-it notes, dot-maps and questionnaires were all very successful. Appropriate deposit boxes for questionnaires were not always provided however	Provide neat, clearly-labelled deposit boxes for questionnaires at all events
Some respondents were unsure of terminology used in the questionnaire despite efforts to employ plain English – specifically: 'public realm'	Ongoing review of materials for consistent use of plain English
Dot-maps worked well as posters, but also when placed on tables with seating where they became centres for some prolonged and interesting debates	Provide tables and chairs with dot-maps where possible
The A3 constraints map was not easy to read	Review colour-coding of constraints map

for some respondents	
Some respondents requested more detailed, local maps to aid discussion of local issues	Consider provision of locally-relevant maps at a larger scale than the JCS area maps. Balance provision with need to maintain strategic focus for JCS
Display material/posters worked well, however Officers felt the amount of text could be reduced and the amount of graphics/images increased accordingly to make the materials more eye-catching to passers-by	Consider the balance of text/images for posters and pop-up branding banners at future exhibitions. Graphics/images attract attention, but text is required by those who do not wish to speak to Officers but prefer to stand and read
Some display stands were looking tired by the end of the consultation period	Replace any damaged display stands, or rotate for newer ones as necessary

Joint Core Strategy Issues & Key Questions – Consultation Report Appendices

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APPENDIX A – PUBLIC EVENTS ATTENDANCE LOG

Approximately 911 people attended the manned exhibitions, as shown below. The 'big three' exhibitions in Gloucester, Cheltenham and Tewkesbury centres (highlighted in bold) were particularly well-attended.

Day	Date	Time	Venue	Authority	No. of attendees
Mon	23rd Nov	11am - 8pm	Gloucestershire College - Cheltenham	Cheltenham	35
Tue	24th Nov	11am - 8pm	Gloucestershire College - Gloucester	Gloucester	25
Weds	25th Nov	9am - 5pm	Oakley Community Resource Centre	Cheltenham	20
Thu	26th Nov	-	-	-	-
Fri & Sat	27th + 28th Nov	10am - 6pm	Promenade, Cheltenham	Cheltenham	190
Mon	30th Nov	3pm - 8pm	Quedgeley Parish Council Office	Gloucester	5
Tue	1st Dec	3pm - 8pm	Bishops Cleeve Council Office	Tewkesbury	30
Weds	2nd Dec	3pm - 8pm	Brockworth Community Centre	Tewkesbury	37
Weds	2nd Dec	3pm - 8pm	Apperley Village Hall	Tewkesbury	8
Thu	3rd Dec	3pm - 7pm	Cheltenham Area Civil Service Sports Association	Cheltenham	70
Fri & Sat	4th + 5th Dec	9am - 6pm	Unit 33, Kings Walk, Gloucester	Gloucester	150
Mon	7th Dec	3pm - 8pm	Lysons Hall, Hempsted	Gloucester	20
Tue	8th Dec	3pm - 8pm	Highnam Old School	Tewkesbury	14
Tue	8th Dec	3pm - 8pm	Alderton Village Hall	Tewkesbury	8
Weds	9th Dec	3pm - 8pm	Innsworth Community Hall	Tewkesbury	12
Weds	9th Dec	3pm - 8pm	Abbey Fields Community Centre, Winchcombe	Tewkesbury	9
Thu	10th Dec	3pm - 8pm	Brizen Young People's Centre, Cheltenham	Cheltenham	62
Fri & Sat	11th + 12th Dec	10am - 6pm	Tewkesbury Main Library	Tewkesbury	216
				TOTAL	911

APPENDIX B – PUBLIC EVENTS SHORT QUESTIONNAIRE

PLEASE ANSWER ANY OR ALL OF THE FOLLOWING QUESTIONS.

1. What are your priorities for development in the JCS area? Please select up to six options from the list below.

- ☐ Affordable housing
- ☐ Education
- ☐ Employment
- ☐ Community facilities
- ☐ Cultural facilities
- ☐ Formal sports and recreation
- ☐ Informal outdoor recreation and general open space
- ☐ Flood prevention
- ☐ Walking and cycling improvements
- ☐ Public transport improvements
- ☐ New highways and roads
- ☐ New rail investment
- ☐ Improved streets, squares and public spaces
- ☐ Climate change measures
- ☐ Renewable energy initiatives
- ☐ Other (please specify) _____

2. If you could choose only one, top priority from the list above, what would it be?

3. Should urban areas be expanded to accommodate growth? If so, where?

4. How/where should Gloucester accommodate future development?

5. How/where should Cheltenham accommodate future development?

6. How/where should Tewkesbury town and the surrounding rural areas accommodate future development?

7. Have we missed anything? Let us know if there is anything else that you feel requires specific policies within the JCS.

Please go to www.gct-jcs.org to read the Issues & Questions Document in full, and to provide more detailed feedback.

Please provide your contact details below if you wish to be kept informed of JCS work. You are not obliged to do so.

Name: _____

Address: _____

Postcode: _____

Email: _____

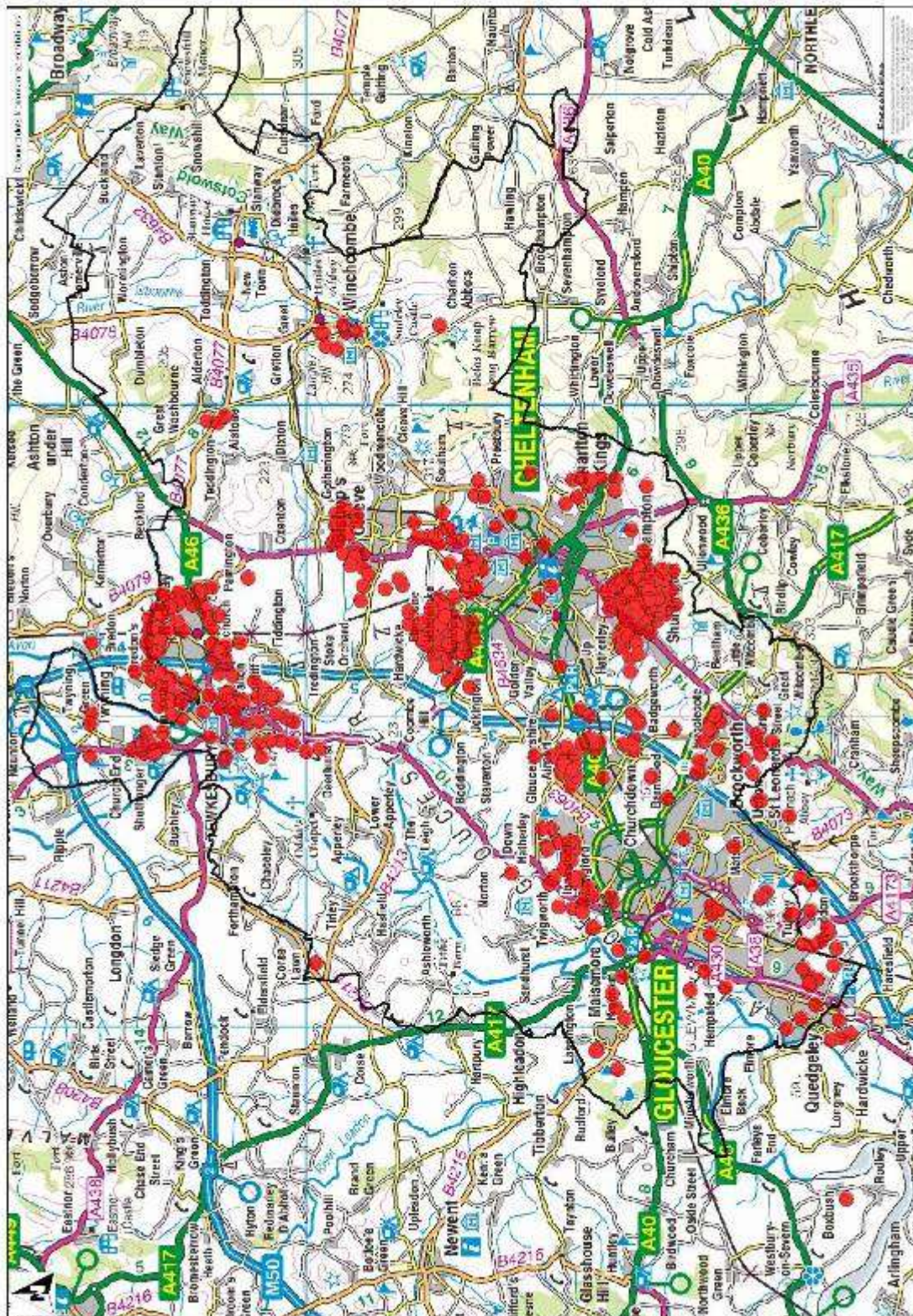
Daytime tel: _____

Please send responses to JCS Team, Municipal Offices, Promenade, Cheltenham, GL50 9SA by **FRIDAY 19th FEBRUARY 2010**.

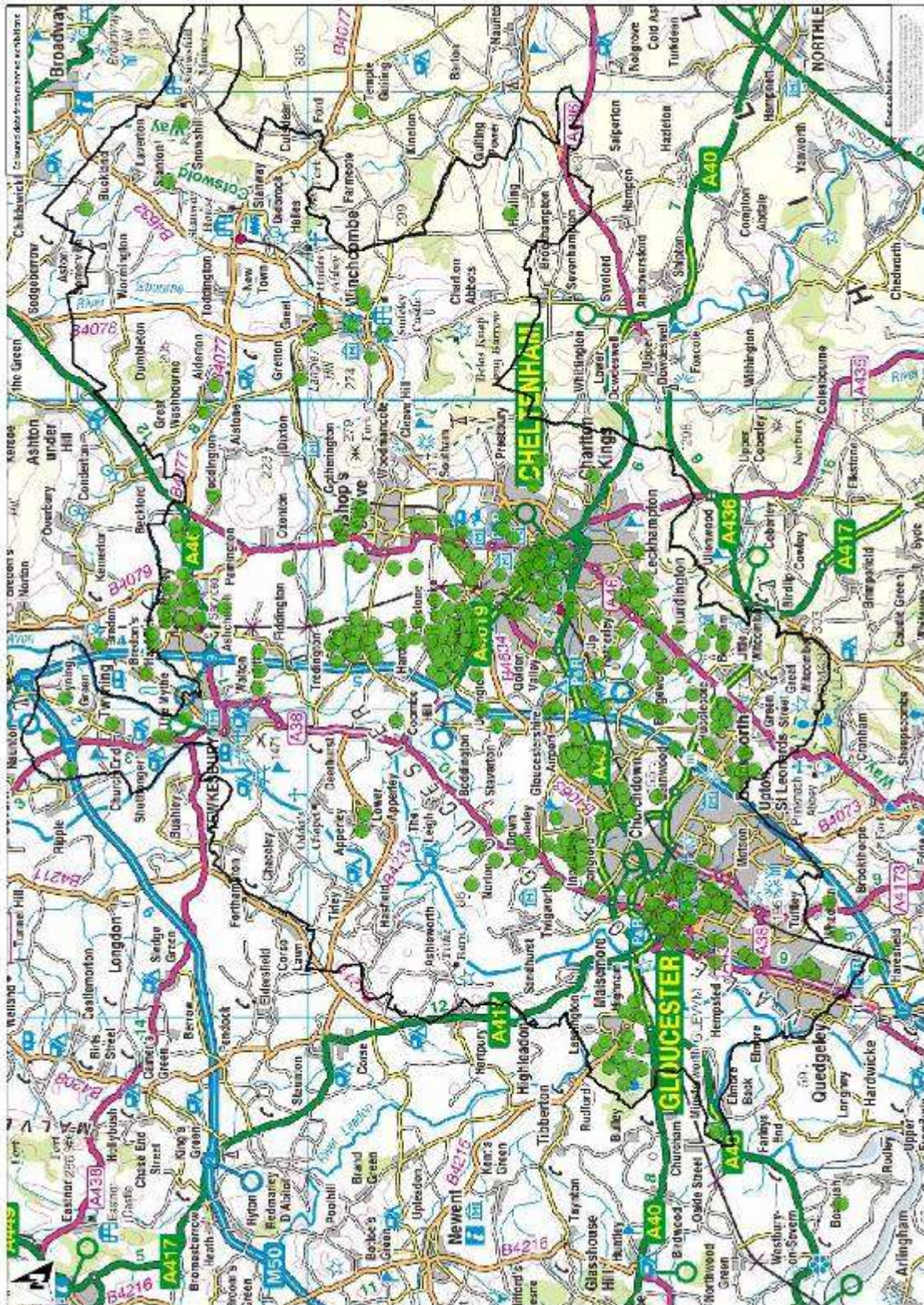
APPENDIX C – INTERACTIVE MAPS

Respondents placed green dots where they felt development was appropriate and red dots (overleaf) where inappropriate. The combined map is shown on the third page.

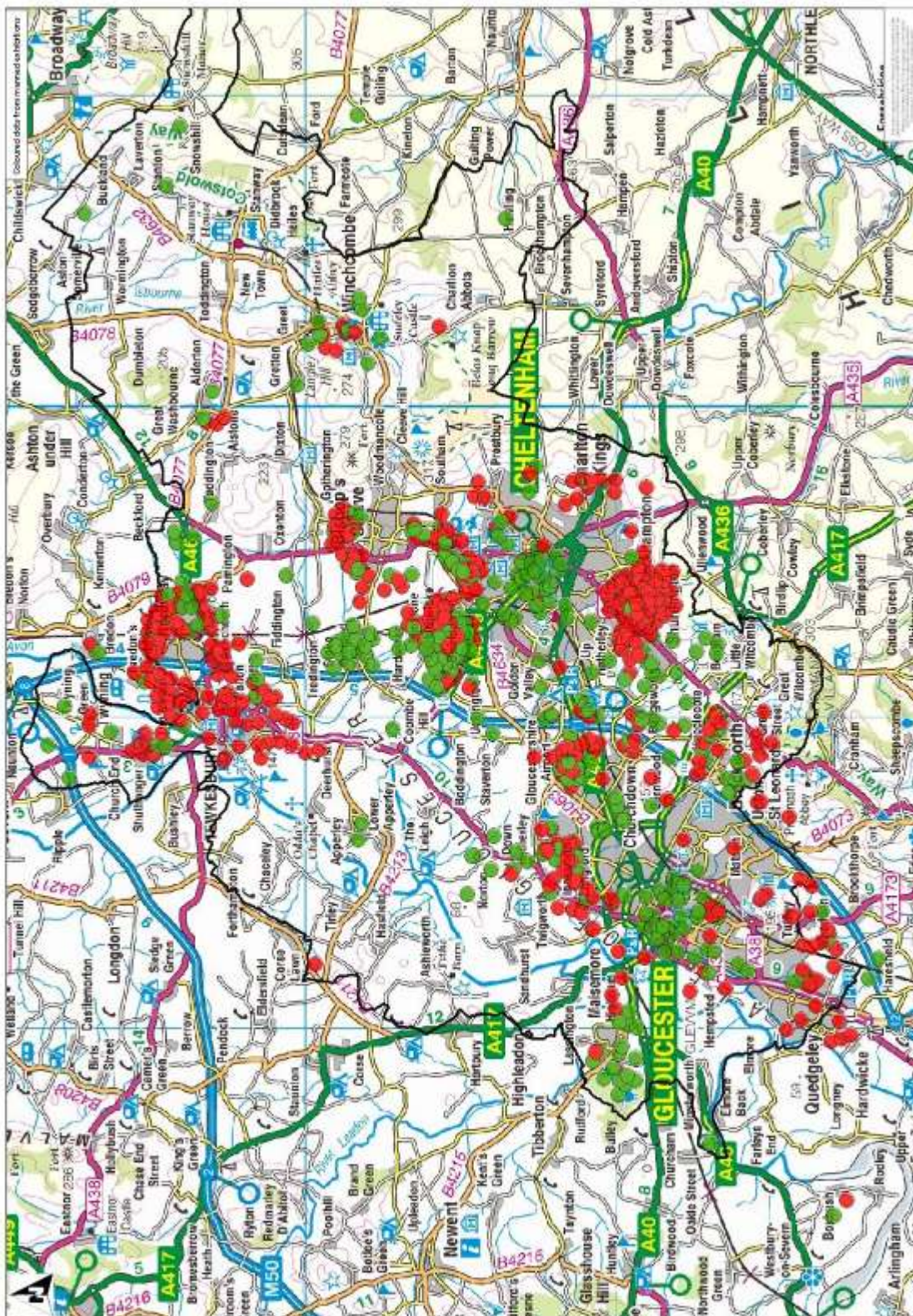
Red dots: areas viewed as inappropriate for development.



Green dots: areas viewed as appropriate for development.



Green and red dots combined.



NB: the primary purpose of this exercise was to engage visitors and stimulate debate, **not** to establish an accurate 'development map'. As the former, the exercise was very successful; as the latter it is too limited to be considered reliable evidence of support/opposition for development of any specific site. However, the response maps are reported here due to their popularity, for information, and as a starting point for more robust analysis. See the main report (pg 6) for more information.

APPENDIX D – SUMMARY OF POST-IT NOTE RESPONSES

A total of 736 comments were collected on post-it notes across all the manned exhibitions. These were logged according to their place of origin, and categorised by type in line with the expected chapter breakdown of the draft JCS. A summary of the issues raised follows below.

Ch.	Subject	Summary of comments
3	Spatial portrait	<ul style="list-style-type: none"> Gloucester and Cheltenham were seen as needing to complement one another socially, economically and environmentally
4	Vision	<ul style="list-style-type: none"> Support was expressed for the principal of joint working between the three authorities. Concern was expressed for Councillors failing to listen to the public and for the Councils' inability to deliver what is required Generally, respondents used this exercise to raise specific concerns rather than to describe a high-level vision. However, elements of a vision can be seen in all the sections below
5	Development in the JCS area	<ul style="list-style-type: none"> Concerns were raised over the accuracy of, and evidence behind, the RSS growth figures. Some respondents wanted no new housing at all, but others saw a lot of need while still questioning the levels of growth proposed Strong support was expressed for re-using brownfield sites and derelict/empty properties (incl. those above shops) before greenfield sites are developed Strong support was expressed for making better use of existing housing stock – tackling empty properties, under-occupation and second homes Support was expressed for protecting the green belt – maintaining separation between settlements (e.g. Gloucester/Cheltenham, and Bishops Cleeve/Gotherington/Cheltenham), protecting the environment and the means of food production However, there were also dissenting voices suggesting building in-between Gloucester/Cheltenham (“it’s inevitable and the gap serves no real purpose so why fight it?”) or Bishops Cleeve/Cheltenham. In both locations, connections and services are good and the green belt is seen as already devalued – developing here was seen as a way to “save the good green belt” elsewhere Conflicting opinions were raised over the best means of providing for growth, some favouring large scale development (“better than small additions that don’t allow proper planning”) and a new town; while many respondents preferred to keep development small (spreading the burden and keeping rural services alive as well as re-using town centre sites) Accordingly, support was expressed for providing limited affordable new housing in villages and rural areas where local people have been priced-out and services have declined, but only within a scale appropriate to the existing settlement Strong support was expressed for providing sustainable transport before starting any new development Many respondents were concerned about / warned against building on or near the floodplain <p>OTHER COMMENTS:</p> <ul style="list-style-type: none"> Build more new housing, ensure good sizes of homes/gardens and high build-quality, maintain local identity (avoid generic styles) Build at higher densities (town houses, no more flats) in urban areas Prioritise social housing within urban areas and more houses in villages Ensure a good social mix in new developments

		<ul style="list-style-type: none"> Jobs first, housing second Plan without boundaries Be imaginative, throw out the rule book Incorporate comments from previous consultations
5.1	Gloucester City	<p>GENERAL</p> <ul style="list-style-type: none"> Strong support was expressed for using Gloucester's heritage, maintaining and respecting its character, and ensuring new development is sympathetic to historic buildings Strong support was expressed for maximising brownfield sites (as per comments summarised above) Strong support was expressed for improving links between the city centre and docks, as well as for regenerating the city centre so its focus doesn't shift to the docks Many respondents wanted to see better shopping (independents <i>and</i> chains), cafes, bars, nightlife, a theatre or cultural centre, and "more things to do" Cheap parking was seen as a way to encourage visitors/spenders More housing in the city centre was seen as a way to keep it active around the clock, and improve security/safety (esp. at night) Many respondents wanted more jobs to be created <p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> B&Q site suggested for re-use as housing / theatre Old College site suggested for re-use as housing / theatre / cultural centre Railway triangle suggested for re-use as a park SW Gloucester "has had its fair share of growth"
5.2	Cheltenham Borough	<p>GENERAL</p> <ul style="list-style-type: none"> Many respondents felt Cheltenham has expanded too much already, and has enough shops, pubs and clubs – further responses to general development (and SUE) proposals for Cheltenham are summarised in Section 5, above Other respondents wanted to see more retail variety and more jobs created, as well as a new secondary school Cheap parking was seen as a way to encourage visitors/spenders <p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> Brownfield sites suggested for housing development include: Baylis, Haines and Strange site, old 'black and white site, land near St Peters Church, land behind bingo hall, Runnings Road employment land, Cheltenham FC site (if club moved to racecourse), under-used shops/flats above Churchill Rd Greenfield or 'already over-developed' sites flagged for protection include: Hunting Butts, Starvehall Farm, New Barn Lane, Lynworth Support was expressed for CBC staying at the Municipal Offices Concern was expressed for provision of a car park at the lido The Eagle Tower was described as an eyesore
5.3	Tewkesbury Borough	<p>GENERAL</p> <ul style="list-style-type: none"> Concern was expressed over further development in and around Tewkesbury town, with particular concern for development in or near the floodplain, and a general desire to protect the green belt (as summarised in Section 5). New housing was seen as having eroded the character of Tewkesbury Significant support was expressed for providing affordable new housing in villages and rural areas where local people have been priced-out and services have declined, but only at a scale appropriate to the existing settlements Need was expressed for another supermarket to rival Morrisons Cheap parking was seen as a way to encourage visitors/spenders Sheltered and smaller homes were seen as necessary in Winchcombe – related to the need to consider the elderly/downsizers more generally in the Borough

		<p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> ▪ Brownfield/other sites suggested for housing development include: Stoke Orchard, the airport site, Tewkesbury, south of Tewkesbury ▪ Greenfield, flood-prone or 'already over-developed' sites flagged for protection include: south of Alderton, Frogfurlong Lane, the Mitton land ▪ "Despite what the EiP says, there are no employment prospects, dreadful traffic congestion, appalling lack of infrastructure and Bishops Cleeve should not have to take any more growth" ▪ "No housing within 3km of waste tips"
5.4	Urban extensions	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ As summarised above, strong support was expressed for re-using brownfield sites and derelict/empty properties before greenfield sites, and for protecting the green belt / maintaining separation between settlements ▪ Significant concern was expressed about the accuracy of RSS growth figures/evidence and for the adequacy of infrastructure provision in the resulting SUEs ▪ Significant concern was expressed about flood risk – if SUEs go ahead, they must incorporate flood alleviation measures / drainage to reduce risk both in and outside developments ▪ As noted, there was disagreement about the need for more housing: "no more homes" said one, "need more homes" said another <p>SOUTH CHELTENHAM</p> <ul style="list-style-type: none"> ▪ If the SUE goes ahead, it must be complemented by adequate infrastructure including a ring road ▪ Park & Ride should not go at Brizen Farm (which is too close to Cheltenham) but at Brockworth ▪ "Development at Brizen Farm / Farm Lane should not take place: unsuitable; ill-conceived" ▪ "Development at Brizen would be beneficial" <p>NW CHELTENHAM</p> <ul style="list-style-type: none"> ▪ Strong resistance was expressed by many immediate locals, as per the general summary in Section 5, but there was some support from others for development in this area, e.g: "growth to NW Cheltenham seems sensible if growth is needed"; "low value greenbelt, if built on it would not coalesce settlements – if you don't build there, prepare to build in more sensitive sites that <i>will</i> coalesce settlements" ▪ If the SUE goes ahead, many felt it must be complemented by adequate infrastructure including J10 improvement <p>BROCKWORTH</p> <ul style="list-style-type: none"> ▪ Brockworth: has had its fair share of development, and now needs better roads/access
5.5	Priorities for development (including comments on services/skills/comm unity)	<p>GENERAL PRIORITIES (relevant site-specific issues provided in brackets where raised):</p> <p><i>Frequently mentioned:</i></p> <ul style="list-style-type: none"> ▪ Social and transport infrastructure – to address current deficiencies and to support any growth ▪ Heritage-led regeneration ▪ Town centre improvements ▪ Rural services ▪ Public transport ▪ Education ▪ Healthcare (e.g Lynworth, Whaddon, Apperley) ▪ Leisure facilities (e.g. Tewkesbury, Winchcombe, Gloucester) ▪ Employment

		<p><i>Less frequently mentioned:</i></p> <ul style="list-style-type: none"> ▪ Year-round activities and support for young people ▪ Housing/support for the elderly ▪ Quality green spaces/parks/play areas ▪ Allotments ▪ Community recycling schemes / more and better collections ▪ More and better cycle paths ▪ Cleaner streets ▪ Public art
5.6	Urban regeneration	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ As summarised above, strong support was expressed for re-using brownfield sites and derelict/empty properties and for protecting the green belt, with significant concern about the accuracy of RSS growth figures/evidence and the adequacy of infrastructure provision in the resulting SUEs ▪ “A living town centre for all ages at all times” <p>SITE-SPECIFIC AREAS OF NEED</p> <ul style="list-style-type: none"> ▪ Lower High Street, Cheltenham ▪ Matson, Tredworth ▪ Bristol Road, Gloucester
6.1	Affordable housing	<ul style="list-style-type: none"> ▪ Affordable housing was seen as a priority for rural areas: “Villages need more (but not too much!) affordable housing so families stay and support local schools and services” ▪ “35% affordable housing needed not the 18% argued for at the Innsworth Appeal”. Other respondents suggested as much as 50% affordable housing, and supported lowering the threshold for affordable housing ▪ Support was expressed for mixing affordable and market housing ▪ “Stop selling council houses immediately” <p><i>NOTE: It is apparent that affordable housing was commonly defined by respondents as ‘low-cost market housing’, and not as shared-ownership, social rented or other forms of affordable housing as defined by housing/planning professionals.</i></p>
6.2	Sustainable building	<p>Sustainable building techniques or features suggested as being desirable include:</p> <ul style="list-style-type: none"> ▪ Incorporating sustainability in new development from the outset ▪ Greywater recycling ▪ Permeable driveways/hard-standing to reduce surface run-off ▪ Higher renewable energy targets ▪ CHP plants in new developments
6.3	Renewable energy	<ul style="list-style-type: none"> ▪ Higher renewable energy targets ▪ CHP plants in new developments
6.4	Flooding	<ul style="list-style-type: none"> ▪ Strong concerns were expressed over flood risk to existing properties being heightened by new development ▪ Strong opposition was expressed to building on or near the floodplain, and the accuracy of EA flood maps was questioned ▪ SUDS were seen as desirable by many, though some questioned their effectiveness, and other parallel means of flood risk alleviation were seen as necessary (e.g. river dredging, drain maintenance). ▪ Respondents felt that climate change must be accounted for in flood risk assessment and amelioration
6.5	Employment	<ul style="list-style-type: none"> ▪ Respondents felt that the location of new housing should be linked to the location of jobs, and new developments should provide their own jobs as well as housing ▪ “Jobs first, houses second”

		<ul style="list-style-type: none"> ▪ Encouraging investment and providing incentives for businesses to locate in the area were seen as desirable. Rates holidays and the engineering skills base were seen as being attractive to investors ▪ “More high-tech jobs, apprenticeships, entrepreneurship”
6.6	City and town centres	<ul style="list-style-type: none"> ▪ All city and town centres were recommended for improvement at respective exhibitions. There was a general desire for ‘better shops, bars, restaurants, leisure, culture’ etc in all centres ▪ A good mix of independent and chain stores was popular with many respondents ▪ Specific areas of concern: <ul style="list-style-type: none"> ○ Cheltenham – general decline ○ Gloucester – general decline / better link to docks ○ Tewkesbury – general decline ○ Winchcombe – risk to independents if Tesco Metro arrives
6.7	Green infrastructure	<ul style="list-style-type: none"> ▪ Strong support was expressed for preserving the green belt, AONB, wildlife corridors, urban parks and open spaces ▪ Strong support was expressed for providing new parks and open spaces in any new development ▪ It was recommended that the JCS team should liaise with Glos Biodiversity Partnership, Glos Wildlife Trust and Glos Orchard Group at every stage
6.8	Gypsy and traveller provision	<ul style="list-style-type: none"> ▪ No comments received
10	Other issues	<p>TRANSPORT</p> <ul style="list-style-type: none"> ▪ Major concerns were expressed over the ability of road infrastructure to cope with proposed housing growth ▪ Many respondents requested full-access at J10 ▪ Need was expressed for better traffic management / light phasing ▪ Sustainable transport options were seen as a vital part of planning for any new development. ▪ Public transport networks were viewed as needing improvement, and being too expensive/infrequent and not serving all parts of the County ▪ A circular bus route round Gloucester was requested, and a train/tram linking Cheltenham and Gloucester (and possibly Tewkesbury) would be popular – e.g. on the Honeybourne Line ▪ Respondents requested more and better footpaths and cyclepaths ▪ Park & Rides were suggested for: Brockworth, A417, A46, Elmbridge, Linton ▪ One respondent suggested using waterways for transport / freight <p>OTHER COMMENTS</p> <ul style="list-style-type: none"> ▪ JCS should use Parish Councils as an information source – e.g. on flooding ▪ More and better recycling (incl. plastics) is required ▪ Need for specialist care homes and wider support for those with mental/physical/learning disabilities in JCS area ▪ Need more community engagement in planning ▪ Concern was expressed over architecture/design – e.g. unsympathetic modern designs in historic areas (blue Glos College), and standard housing types in new developments

APPENDIX E – LOCATIONS IDENTIFIED AS SUITABLE FOR DEVELOPMENT IN SHORT QUESTIONNAIRE

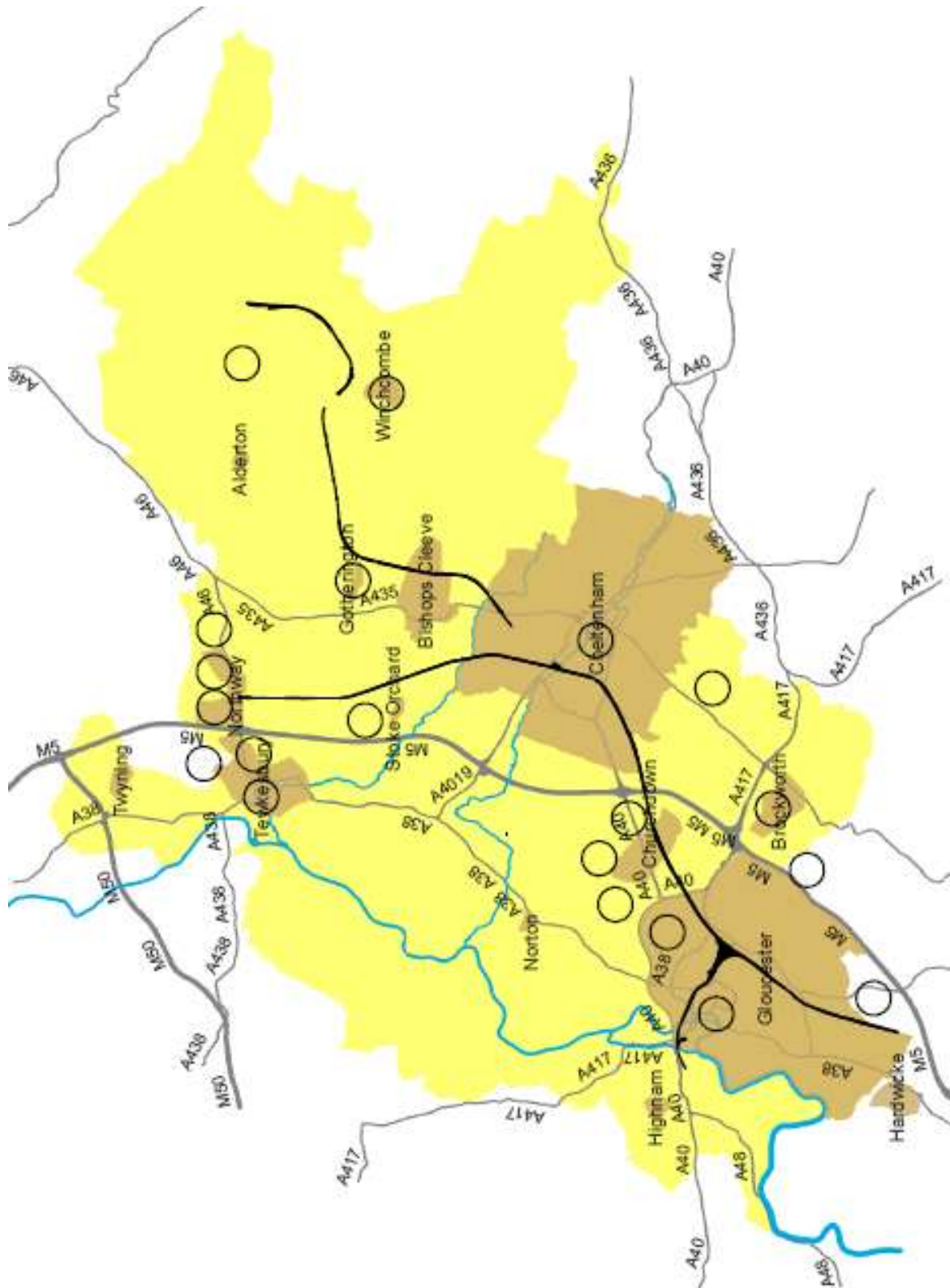
The short questionnaire (Appendix B) asked respondents to identify where they felt development would be suitable if it were to happen. Responses are listed below and plotted in the map overleaf.

Locations are listed in the table as provided by respondents. Not all locations correspond with the correct district, in line with people's individual perceptions of what constitutes their local areas.

Locations are listed and mapped without prejudice to the JCS or to any future planning applications.

Gloucester	Cheltenham	Tewkesbury
A40 east and west	A40 east and west	North of Stoke Orchard
Innsworth	Cheltenham town centre sites	Northway
Longlevens	St Paul's	Mitton
East of M5 to south of city	St George's Place	Gloucester, Worcester and Bredon Roads
Old Gloucester Road to Churchdown	Princess Elizabeth Way	Tewkesbury town centre
Brockworth	Shurdington	North of Tewkesbury
Gloucs city centre	Midwinter Allotments	Winchcombe
Railway Triangle		Gotherington
Northgate Street		Toddington
Brunswick Road		Ashchurch MOD site
Old College Buildings		Newtown
Behind the Gloucester library		East of Northway
Gloucester sports centre		Beyond Mythe towards Worcester
NE Gloucs		Ashchurch area
Longford past Staverton		
South Gloucester		

APPENDIX E cont.– MAP OF LOCATIONS IDENTIFIED AS SUITABLE FOR DEVELOPMENT IN SHORT QUESTIONNAIRE RESPONSES



APPENDIX F – PARISH COUNCIL EVENTS ATTENDANCE LOG

The five events were attended by a total of 40 representatives from 23 Parish Councils. Asterisks indicate those Parish Councils who have also submitted formal written representations:

- Alderton PC *
- Bishops Cleeve PC
- Brockworth PC *
- Charlton Kings PC
- Churchdown PC *
- Elmstone Hardwicke PC *
- Gotherington PC
- Gretton PC
- Hucclecote PC
- Leckhampton and Warden Hill PC *
- Leigh PC
- Northway PC
- Quedgeley PC
- Stanton PC
- Swindon Village PC *
- Teddington & Allstone PC *
- Toddington PC
- Twynning PC
- Uckington PC
- Up Hatherley PC *
- Wheatpieces PC
- Winchcombe TC *
- Woodmancote PC *

The following 11 Parish Councils indicated they were content to miss the events having already submitted formal written representations to the *Issues and Key Questions* document:

- Ashchurch Rural PC
- Bredon, Bredons Norton and Westmancote PC
- Brookthorpe with Whaddon PC
- Chaceley PC
- Down Hatherley PC
- Minsterworth PC
- Overbury and Conderton PC
- Prestbury PC
- Stoke Orchard PC
- Twigworth PC
- Upton St Leonards PC

A total of 20 out of 54 Parish Councils therefore declined to attend the events and have not yet submitted formal written representations. All Parish Councils will have further opportunities to contribute to the JCS, notably at the *Developing Preferred Options* stage, scheduled for October 2010.

APPENDIX G – PARISH COUNCIL PRIORITIES (quoted from *Parish Councils Consultation Report*)

1. Vision

- The JCS must:
 - Focus on local community needs, not just regional housing targets, and ensure a balanced approach to provision of employment and housing
 - Protect the environmental, rural and urban characteristics that make the JCS area (and the separate and distinctive places within it) an attractive place to live and work
 - Address rural and urban areas/issues in a balanced way
 - Encourage sustainability/green living and prepare for climate change by, for example: protecting environmental designations and limiting urban sprawl; addressing flood risk; directing development to brownfield sites before greenfield; supporting appropriate renewable energy production; supporting local and community food production
- The JCS area, its residents, workers and visitors should enjoy:
 - A high quality of life with improved open spaces, education, health and leisure
 - Thriving rural and urban communities, engaged with planning their own futures
 - Protection from flooding, and the mitigation of flood impact
 - A mixed economy (agriculture, manufacturing and services), and a highly-skilled workforce attracting inward investment
 - Affordable, well-designed housing for all – urban and rural – in mixed communities with good access to services and employment
 - Good road/rail infrastructure and traffic management. Better public transport, walking and cycling routes
 - Good access to the countryside and green spaces

2. Sustainability

- Maintain local and rural services – including through development of new housing, services, community facilities and wider infrastructure at an appropriate scale
- Support local food production – including through veg-growing schemes, preservation of productive land, provision of allotments, support for local shops/farmers
- Support local green energy production, primarily through: hydro power, geothermal, combined heat/power pumps, energy-from-waste, micro-generation. There were mixed views on the need for and impact of wind turbines and the proposed Severn Barrage
- Improve energy efficiency of existing housing stock and new-build – consider setting targets beyond those of central government policy / building regulations
- Reduce the need to travel and provide sustainable transport options including public transport and cycle routes – but must acknowledge the likely continued dominance of the private car in rural areas. Concern was expressed for failure to enforce corporate green travel plans, and for the expense of using local park and ride schemes
- Create integrated, self-sufficient communities through a combination of all the above initiatives

3. Housing

- Concern expressed over the scale and nature of housing need in the RSS – must provide housing types and numbers to suit local need (including for key workers)
- New housing provision must be linked to job creation

- New housing should be: energy efficient; of high quality design and space standards; of higher density in urban areas; and planned to create mixed/balanced communities
- 40% target for affordable housing. Support for intermediate ownership schemes.
- Affordable housing need seen as great in both urban and rural areas. Provision is required within existing settlements, not just urban extensions. Concern expressed for the young being priced-out of villages (demographic impact). Concern expressed for the limited opportunities to provide affordable housing in many villages due to: the lack of infrastructure and employment in villages; the planners' resulting view that villages are not sustainable locations for new housing; and the fact that new affordable housing can only be provided in conjunction with new market housing, suggesting a scale of development that conflicts with many villages' idea of what is acceptable ('Catch 22')
- Appropriate development in villages and rural areas accepted, but must use previously-developed land as a priority, and bring empty properties back into use (e.g. above shops)
- Consider building a new town

4. Employment

- Foster local specialisms, e.g:
 - Gloucester – Manufacturing
 - Cheltenham – Services, tourism
 - Tewkesbury – Light industry, logistics, tourism
 - Outer Areas – Tourism, home working, farming and diversification, cottage industries
- Develop a skilled workforce – focus on education, suitably targeted at the needs of current and future local employers
- Balance manufacturing and service industries, and support agriculture. Must consider the industries we don't want to attract as well as those we do
- Provide incentives for businesses to locate in the area – e.g. green technology and hi-tech industries, incubator units for new businesses
- Provide local employment, but must understand that people will not always live where they work, and some will/must commute. Also, consider accepting appropriate employment development first, and dealing with transport/access issues to the site second
- Encourage home-working – e.g. through broadband provision
- Provide compact business sites / incubator units in rural areas
- Support farm diversification
- Protect environmental and heritage assets (in their own right, but also as the foundation of the tourist industry and associated employment; and as a key reason why the area is a nice place to live/work that may attract people to start a business here)
- Re-use empty employment sites
- Support employment growth at Ashchurch (due to good rail/road links)

5. City and town centres

- All city/town centres:
 - Regeneration needed in Cheltenham, Gloucester and Tewkesbury: re-use existing buildings where possible – new is not always best, most sustainable, or in keeping with character
 - Better mix/range of quality chain stores and independent shops/markets to enhance local distinctiveness (Cirencester cited as good example) – and to create an 'experience'. This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces
 - Halt out-of-centre retail development (including better control of supermarket development that draws trade from town centres)

- Better access by public transport from rural areas.
- Reduce the dominance of vehicles in centres – promote pedestrian/cycle access and movement. Support well-placed park and ride schemes
- Provide free/more affordable car parking to better compete with other centres
- Make better use of vacant shop units, and empty properties above shops (e.g. for affordable housing)
- Support for more people living in town/city centres to create busy street-life around the clock, to foster sense of community, and to improve safety after dark
- Maintain provision of public conveniences
- Attract tourists, but not at the expense of the needs of locals
- Gloucester:
 - Support for comments expressed by the public. No specific additional comments
- Cheltenham:
 - Focus development on the Lower High Street
- Tewkesbury Town Centre:
 - Develop relationship between town and waterways
 - Enhance local, friendly, independent feel
 - Consider bypass to reduce air pollution/traffic problems
- Surrounding smaller and rural centres: support for shared/cooperative provision of services in neighbouring settlements. Avoid focus on towns/cities at expense of rural communities
- Bishops Cleeve and Winchcombe should not be classed as “towns”

6. Sustainable urban extensions

- Concern expressed over evidence for and scale of RSS targets, and the need for urban extensions
- Protect the Green Belt and avoid coalescence of settlements. Re-use brownfield sites and empty buildings before greenfield sites
- If development does go ahead:
 - Ensure it provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies. Infrastructure to be in place prior to construction/occupation of housing. New development must be mixed and with a real sense of community, high design/space standards (design-out crime) and adequate open space
 - New developments should be equipped to process their own waste
 - Major development at NW Cheltenham will require full-access J10
 - Consider building a new town in preference to urban extensions
- The concentration of new development around urban areas must not be allowed to suck in capital expenditure on infrastructure to the detriment of investment required to existing infrastructure in the rural hinterland

7. Flooding

- Flood prevention and mitigation viewed as the most important planning issue in the JCS area
- New development must not increase (and should be designed to reduce) flood risk to existing properties
- Flood zones should be defined with a margin to account for climate change, and should incorporate local knowledge. There should be no building on the defined floodplain
- Flood risk assessment and flood defences to account for both fluvial and pluvial flooding

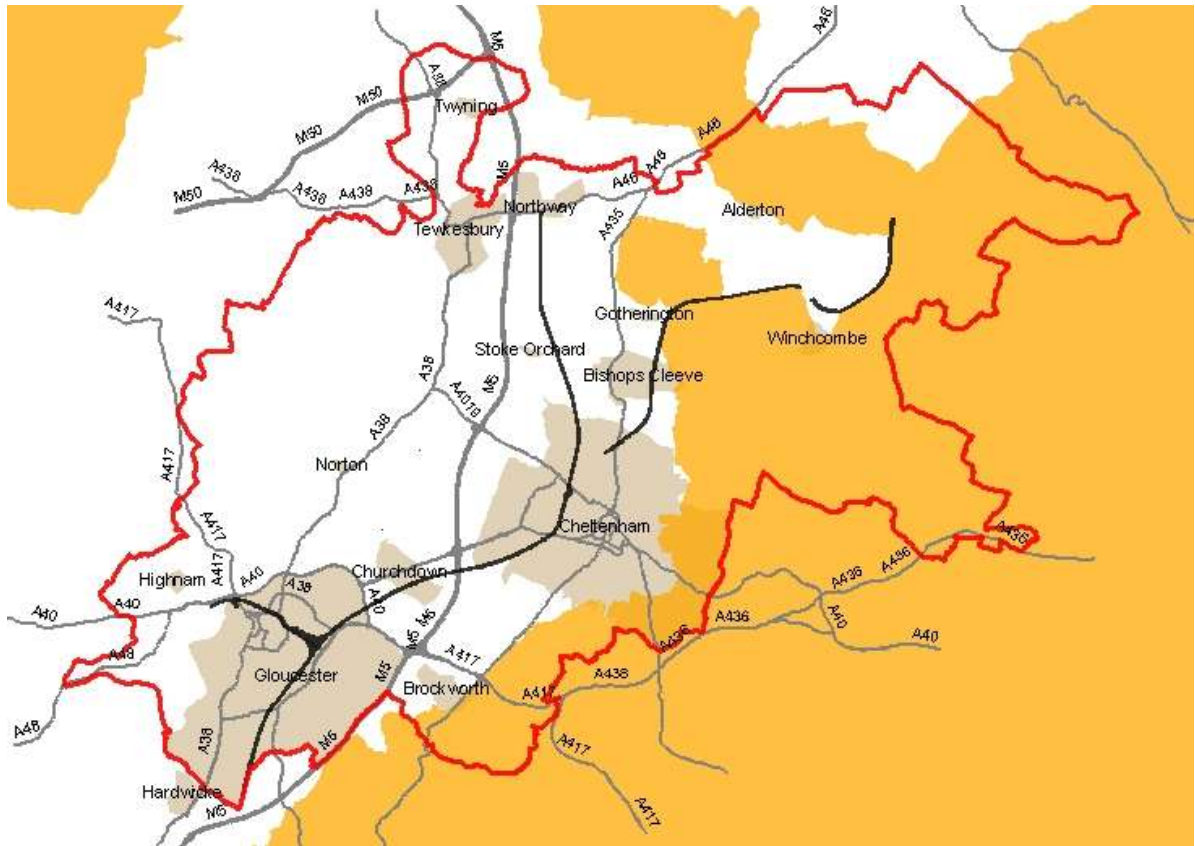
- JCS team to consider producing a Water Management Supplementary Planning Document, and imposing flood policies beyond those of central government (PPS25). Support was expressed for the Pitt Report recommendations
- Practical flood prevention suggestions included:
 - Investment in drainage infrastructure, dredging, regular maintenance etc
 - Better enforcement of rules regarding maintenance of drainage infrastructure
 - Permeable paving for roads
 - Planting schemes to control water flow
 - Grey water recycling for all new-build
 - Culverts to be built under new roads
 - Flood infrastructure/storage/SUDS can be attractive and support biodiversity as well as fulfilling flood prevention role

8. Green infrastructure

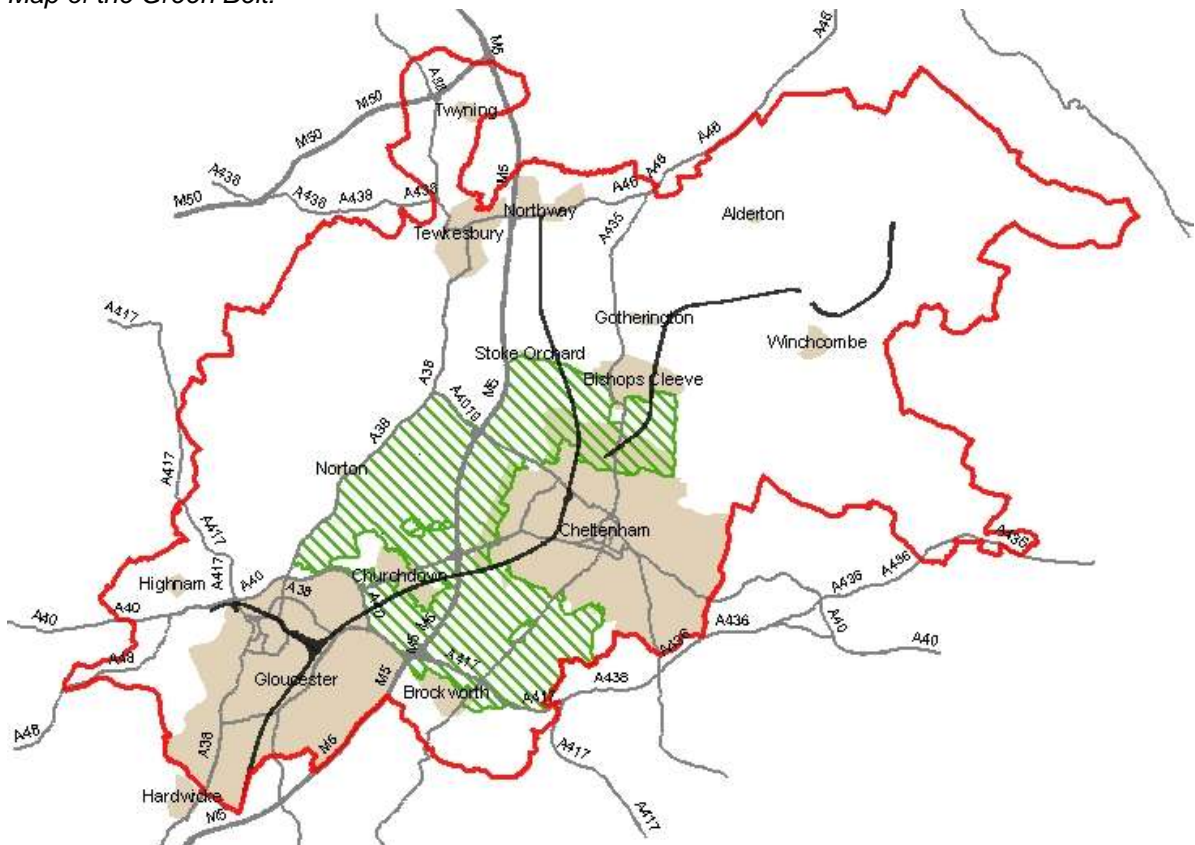
- Protect the AONB, Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces, etc – promote biodiversity, provide a mix of formal and informal open spaces
- Green Infrastructure approach was endorsed: connecting and managing all green spaces for free access and multi-functional use by all
- Support provision/expansion of allotments, community orchards, community composting – link to local food schemes
- Concern that 'green spaces' provided by developers are inadequate/token gestures on undevelopable land. Green spaces must be usable
- Existing communities on the urban-fringe must not lose access to the countryside once urban extensions are built
- Maintain footpaths / rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces
- Concern over location of gypsy / traveller sites
- Support for farmers as "guardians of countryside"
- Support for provision of green burial sites

APPENDIX H – CONSTRAINTS MAPS

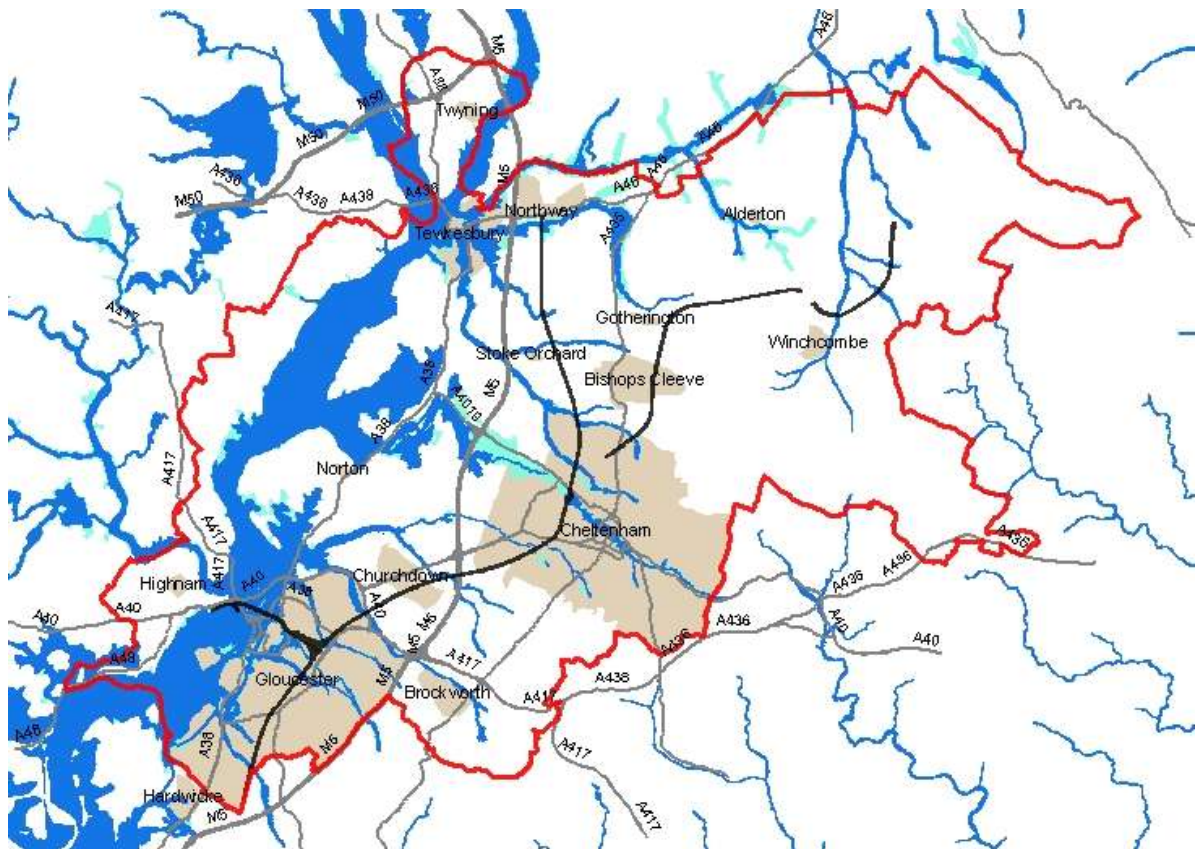
Map of the Cotswold Area of Outstanding Natural Beauty:



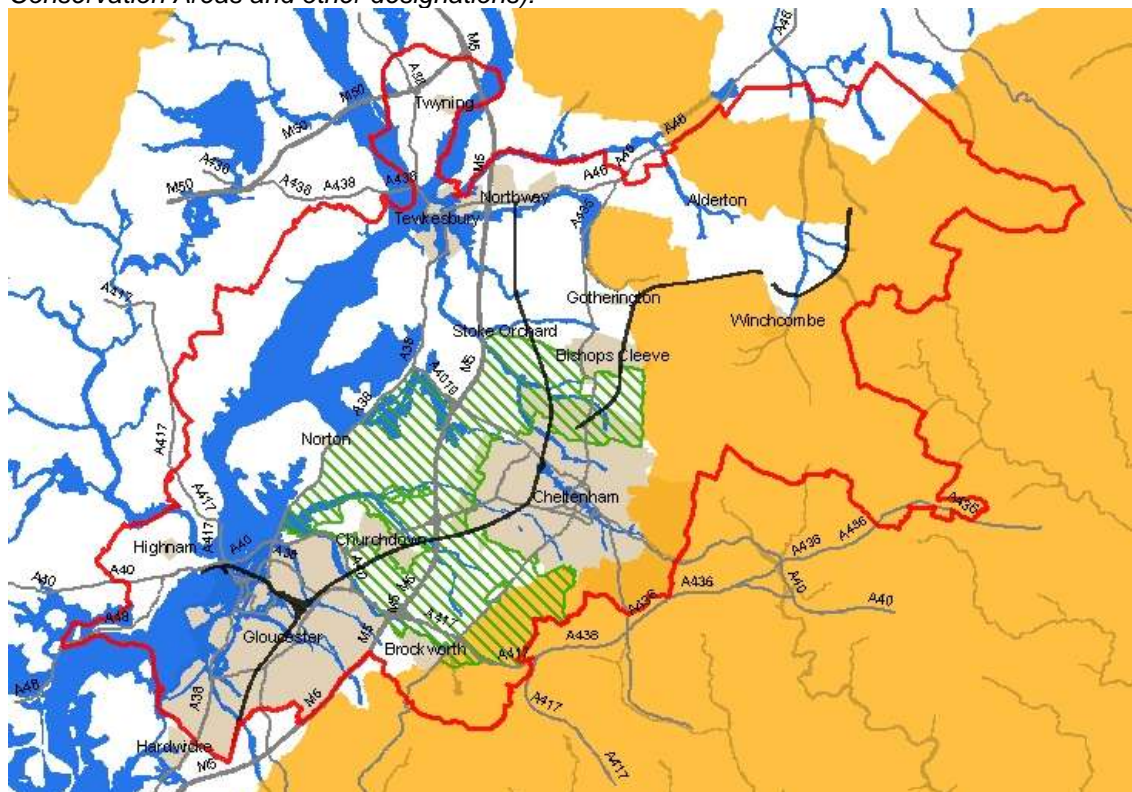
Map of the Green Belt:



Map of the Flood Zones:



Map of AONB, Green Belt and Flood Zones combined to reveal major development constraints (NB: other constraints exist area-wide and on a site-by-site basis, e.g. Conservation Areas and other designations):



APPENDIX I – STRATEGIC OBJECTIVES

4.12. In order to achieve the Vision the Joint Core Strategy will need to set objectives that will guide the future development of the area.

4.13. These are set out below as Strategic Objectives:

1. To mitigate contributions to the causes climate change and ensure effective adaptations are developed to improve the resilience of the Joint Core Strategy area to the impacts of climate change.
2. To reduce the risk of flooding and its impact, particularly by reducing the likelihood of communities and key infrastructure becoming inaccessible during flood events.
3. If the Regional Spatial Strategy for the South West is published it will be necessary to meet its requirements in the provision of new homes that meet the variety of housing needs across the Joint Core Strategy area and, in particular, ensuring that the provision of new homes facilitates the attraction and retention of skilled people to ensure economic growth.
4. To protect, manage and enhance biodiversity, the natural environment and formal/informal recreation through the development of a Green Infrastructure Strategy and the potential idea of a Regional Park. In particular, to increase the value and accessibility of the Joint Core Strategy area's environment for the benefit of the natural environment and the improved health and well being of the Joint Core Strategy area's population.
5. To build on the current high levels of self-reliance in respect of employment within the Joint Core Strategy area by encouraging employment sectors that are already strong within the area and attracting additional sectors that will help retain and attract skilled workers.
6. To develop the skills of people of all ages to match the future employment opportunities within the Joint Core Strategy area and seek to retain a higher proportion graduates.
7. To effectively encourage regeneration that makes the best use of the Gloucester Heritage Urban Regeneration Company and Cheltenham's Civic Pride sites and the medieval heritage of Tewkesbury.
8. To facilitate access to and improve healthcare and community facilities.
9. To deliver effective solutions for transport, planning and urban design to reduce the dependency upon the private car and improve the links between settlements so they can complement one another.
10. To realise regeneration aspirations and to establish the Joint Core Strategy area as a single attraction that caters for a diverse range of retail, cultural, educational, leisure and tourism needs by capitalising on the unique strengths of each settlement.
11. To ensure that development protects, preserves and enhances the important historic environment and the distinctive townscape qualities of the Joint Core Strategy area, including protection of key views and accessibility of historic locations throughout the Joint Core Strategy area.
12. To maintain and build upon the existing tourism economy of the Joint Core Strategy area by improving accessibility to existing attractions, encouraging the development of new attractions in accessible locations and by providing services to facilitate growth in the tourism industry.
13. To promote self-reliant communities by maintaining, enhancing and developing local and district shopping centres that provide for the day-to-day shopping and community service needs of the local population and promoting appropriate development that supports their function.

APPENDIX J – PART 1 ONLINE QUESTIONNAIRE

1. Do you agree with the Spatial Portrait?

Yes ☐

No ☐

Other

1b. Do you feel there are any areas/data sources missing?

Yes ☐

No ☐

Other

2. Are the Key Issues the right ones for the Joint Core Strategy to tackle?

Yes ☐

No ☐

Other

2b. Do you think there are any issues missing? If so, please indicate an evidence source to support the issue.

Yes ☐

No ☐

Other

3. Do you agree with the Vision for the Joint Core Strategy area?

Yes ☐

No ☐

Other

3b. Are there any areas missing?

Yes ☐

No ☐

Other

4. Do you consider that these are the right Strategic Objectives for the Joint Core Strategy?

Yes ☐

No ☐

Other

4b. Do you feel that there are any issues that have not been adequately addressed?

Yes ☐

No ☐

Other

5. General Comments

APPENDIX K – SPATIAL PORTRAIT (PART 1 CONSULTATION)

The Joint Core Strategy area lies within the county of Gloucester in the south west region, at the foothills of the Cotswold Hills with the M5 corridor to the west, stretching east to the Severn Vale. The area is dominated by Gloucester city and Cheltenham town, as well as being influenced by the market town of Tewkesbury. The three main settlements compliment with each other as centres for housing, employment and culture, retail, entertainment and tourism activities, while supporting the needs of smaller towns and rural villages. Although these urban centres are the focus for services and facilities they have areas in need of regeneration, which is being targeted through schemes and initiatives such as Gloucester Heritage Urban Regeneration Company, Civic Pride and Tewkesbury Masterplan.

Surrounding the urban areas is the wider rural area of Tewkesbury; a focus for agriculture and tourism, with services and facilities provided by vibrant market towns. The rural settlements look to the market towns, Gloucester and Cheltenham for employment, shopping and leisure, but also look beyond the Joint Core Strategy area, in particular looking north to Evesham.

The area is home to 311,900 residents, with Gloucester City projected to remain the area with the highest population up to 2026. However, due to anticipated development, Tewkesbury Borough is projected to experience the largest population increase of 31%^[1], with Cheltenham Borough experiencing very little population growth.

Tewkesbury Borough is the only district within Gloucestershire predicted to experience an increase in the number of children and young people between 2007 and 2026. The Joint Core Strategy area will see a significant increase in the number of older people. This is particularly pertinent given that only Gloucester and Tewkesbury Borough will also see an increase in working age population.

The area contains many important historical assets, including the rich array of below and above ground remains in Gloucester with the Cathedral and Docks standing out, the famous Georgian architecture of Cheltenham and its spa origins and the more vernacular variety of Tewkesbury with its medieval abbey and its association with the infamous battlefield.

These historic areas are set within a rural landscape, which includes the Cotswold Area of Outstanding Natural Beauty, several SSSI sites and numerous nature and landscape conservation areas. Outside the built areas there are areas of woodland and good quality agricultural land. Flood zones along the River Severn and its tributaries influence much of the sub region and long term planning will need to consider the effects of climate change, particularly following the significant floods in July 2007 which segregated communities and infrastructure.

There is a considerable identified need for homes across the whole Joint Core Strategy area, particularly affordable homes. The attractiveness of the area has influenced house prices and although there is significant variation in house prices across the area, they are approximately 8 times the average salary. Although the population is slowly increasing, the number of households is increasing at a faster rate. The number of one person households is expected to increase over the next couple of decades to exceed the number of married couple households across the County. Detailed analysis reveals that by 2026 about half of all one-person households will comprise a lone-pensioner.

There are differences in earnings, skills and qualifications across the area and there are pockets of significant deprivation within the urban areas. Employment opportunities are dominated by public administration, education and health, distribution, hotels and restaurants, banking, finance and insurance sectors and manufacturing. Provision on employment land remains an issue across the whole Joint Core Strategy area.

The area has 61% of the population at working age and the percentage of working population that is economically active is above national average. Long term unemployment figures are high for Cheltenham Borough and Gloucester City's educational attainment is significantly below national average. Income levels and levels of welfare dependency distribution indicate that the area has more affluent rural neighbourhoods. Despite this, urban neighbourhoods currently have better access to services with people living in rural neighbourhoods have to travel much further to reach key services. A significant minority of people in rural areas rely on public transport and many have no effective public transport access to a GP surgery with the majority relying on private car use.

The two main urban centres have areas that, according to the index of multiple deprivation, are within the top 10% most deprived areas nationally. In Gloucester these areas are affected by income; employment; health and disability; education skills and training; barriers to housing and services; crime and disorder; living environment. In Cheltenham these areas are affected by income; education skills and training; crime and disorder; living environment. Tewkesbury Borough has a number of areas that are affected by barriers to housing and services. Cheltenham has a higher number of victims of burglary, Gloucester has more victims of violence, while Tewkesbury Borough experiences less victims of crime. While benefit claims and lower crime levels show that socio-economic deprivation is not as prevalent in rural neighbourhoods as in urban areas the problems of accessibility adds another dimension to the deprivation across rural neighbourhoods.

The area is well served with rail, motorway and strategic road connections, acting as a gateway to the Forest of Dean, South Wales and the South West. The Gloucestershire Airport provides unique and increasing services to the area. The majority of residents travel within the area for work and services, as well as to areas such as Bristol, Worcester or Evesham. The vast majority of commuters use private cars (66%), with little reliance on public transport, walking or cycling. The major urban centres are compact and have potential for improvements to public realm and pedestrian linkages. The area is congested and suffers from the associated negative impacts this has on the economy, local air quality, climate change, quality of life and health. Consideration needs to be given to the strategic road network including the M5, which can be used as a ring road to bypass the congested urban areas.

[1] Gloucestershire Story 2009. Produced by the Research Team Chief Executive Support Unit, Gloucestershire County Council 2009.

APPENDIX L –KEY ISSUES (PART 1 CONSULTATION)

The characteristics outlined in the spatial portrait, the evidence base and community engagement work have identified issues that need to be addressed in the Joint Core Strategy.

A. Risk of lack of self-reliance and complementarity between settlements

Larger urban areas of Gloucester, Cheltenham and Tewkesbury, together with Winchcombe and Bishops Cleeve, offer a wide range of services, facilities and opportunities, while more rural communities can feel isolated with few or no services on hand. By developing complimentary relationships settlements can work together to serve the community, become more self-reliant and reduce the need to travel. There is a need for the area to be more competitive together.

B. Regeneration of urban areas

The urban centres have areas in need of regeneration and revitalisation. These areas contribute to loss of economic activity, businesses relocating outside the area and reduced retail activity. Urban centres need to be regenerated to increase the area's attractiveness to investors, visitors and residents, to bring centres back into use and to make the area robust and competitive for today's economy and that of the future. Developed needs to compliment the historic environment, where new and old need to work together.

C. Declining retail offer

Urban centres and rural areas are seeing the closure of retail outlets. The area also loses custom to larger centres such as Bristol, Cardiff, Birmingham and Swindon, which are all easily accessible alternatives. Cheltenham in particular has experienced a reduction in its national appeal to retail customers.

D. Increasing demand for housing and particularly affordable housing

A key challenge facing the area is to provide the level of housing required within the existing urban areas. The area faces a variety of housing needs and in particular affordable housing, lifetime homes, accommodation for the elderly and all age groups, gypsy and traveller accommodation, family homes as well as an increasing numbers of single households. The Joint Core Strategy must set out a long-term strategy for accommodating the housing, together with employment, retail and leisure requirements, together with the infrastructure required to support this growth.

E. Low skills and poor education attainment

There are disparities in education attainment across the Joint Core Strategy area, with Gloucester having far fewer residents achieving NVQ Level 4 and above. However, residents within Tewkesbury Borough and Gloucester achieve higher GCSE results than those in Cheltenham. The opportunity for education and skills training needs to be accessible for all residents with the Joint Core Strategy area. The need for re-training opportunities may become greater with changing economies and business opportunities. The area must readdress the current loss of school, college and university leavers to attract business and commerce with a strong local workforce.

F. Job provision, lack of employment and economy

Gloucester city has a lower level of business stock than the rest of the area. A key challenge facing the Joint Core Strategy is to ensure that employment land and jobs are delivered to enhance the economy in sustainable locations to minimise the need to travel. This is particularly pertinent in urban areas where the availability of land is low. The Core Strategy faces challenges in delivering these requirements with an aging population, enhancing the need to attract and retain skilled working age people to this beautiful part of the south west region. The economy across the area, and particularly the rural area, suffers from a lack of infrastructure and high speed broadband, particularly in the rural areas. The area currently accommodates industrial businesses which are important to the economy, it is vital these are retained and their needs supported.

G. Deprivation

The whole JCS area supports an increasing number of households claiming housing benefit with Gloucester having the highest amount of areas within the top 10% most deprived nationally. Residents within Gloucester and Cheltenham are more likely to face fuel poverty than those living in Tewkesbury Borough. These figures reflect the more affluent nature of rural locations. However, those living in rural areas face difficulties accessing services and facilities. The data highlights the areas' distribution of pockets of deprivation within otherwise affluent areas. It is important to address the levels of crime and the fear of crime across the area, and particularly in the urban areas, together is an adequate supply of community infrastructure.

H. Poor access to services and healthcare

The rural nature of the JCS area means that many residents have to travel to reach services, with some areas suffering from inaccessibility. Access to public transport across the area increases dependency on private car usage and is an issue that needs to be addressed through the Joint Core Strategy. Evidence indicates that at a local level the number of residents dying early as a result of key illnesses is notably higher in Gloucester. The Joint Core Strategy can play a key role in promoting healthy lifestyles and exercise through the provision of open space, green infrastructure and sports facilities, as well as creating green linkages fostering health improvements through walking and cycling.

I. Public transport and congestion

Use of the private car is high and the area suffers from congestion and poor air quality. Communities across the Joint Core Strategy area have to travel for services. There is a need to reduce travel, creating balanced communities with an adequate provision of facilities. There is a need to reduce and manage car use and promote and encourage more sustainable means of travel, such as walking, cycling, public transport, with appropriate, accessible and sustainable transport provision.

J. Flood risk

The River Severn and River Avon, their tributaries and surface water and water movement have an impact on the area. Gloucestershire has been adversely affected by flood events in the past; residents and infrastructure are in need of protection from the segregation caused by such events.

K. Risk to natural environmental assets

Included within the area are internationally and nationally important habitats, Sites of Special Scientific Interest, the Cotswold Area of Outstanding Natural Beauty, areas of landscape and biodiversity importance and locally important wildlife sites. Also within the Joint Core Strategy area are Special Areas of Conservation, including the Severn Estuary SAC, SPA and Ramsar site. Most habitats and species are subject to ongoing pressures and are in need of protection and enhancement. Additional and improved greenspace is needed within urban areas and on the urban fringes. There is a need to enhance the protection of areas and species through maintaining openness, preventing isolation and areas becoming cut-off. The openness of the views to and from the Cotswold escarpment, Robinswood Hill and Cleeve Hill are important. The agricultural land across the area is important for rural economy, food production, tourism and recreation.

L. Climate change

Greenhouse gasses are contributing to climate change, which will affect the weather and flood events in the future. Residents in the area are high users of the private car, there are few renewable energy installations, and many rural residents have to travel for services, all of which contribute to greenhouse gas emissions. Development can contribute to climate change and the use of energy, as well as increasing waste. Evidence highlights that the amount of waste produced across the area is a key issue. The Joint Core Strategy has a key role to play in promoting sustainable design and construction, making better use of resources, minimising waste and carbon emissions.

M. Provision and protection of cultural, leisure and tourism offers

The area plays host to many important historic assets that are great tourist attractions, including the Gloucester docks and cathedral, Cheltenham's regency architecture and grandeur, Tewkesbury Abbey and Tudor buildings and picturesque market towns and villages, all set within attractive Cotswold and Severn Vale landscapes. The area needs to improve the opportunities that these assets present to reduce the 'gateway' effect and return the area to a 'destination' on the border of the South West, West Midlands and South Wales. A need for sufficient hotel provision has been highlighted through the evidence base, this will support the areas' numerous festivals and events.

N. Providing for inclusive communities

The Joint Core Strategy area is home to a wide range of communities from a variety of backgrounds. These communities have differing housing, cultural and living requirements. The Joint Core Strategy shall play a role in providing all residents with a safe place to life that provides equal opportunities, meets their requirements and enhances their community.

APPENDIX M – VISION (PART 1 CONSULTATION)

The vision has been informed by:

- Sustainable Community Strategies for Gloucester, Cheltenham and Tewkesbury
- Sustainability Appraisal
- The Spatial Portrait
- Consultation feedback

By 2026 the regenerated urban areas of Gloucester, Cheltenham and Tewkesbury town will be the key centres for services in the area, acting as sub-regional hubs supporting a network of rural settlements and increase the competitiveness of the area in the South West and West Midlands context. Within the conserved unique historic settings they will offer improved housing for all needs, employment, retail and leisure facilities, healthcare services and a variety of further and higher education opportunities. All settlements will be inclusive places with robust and safe communities, providing residents with an improved quality of life, health and well-being and reduced need to travel. The Joint Core Strategy will create strong and complementary communities that retain local distinctiveness through a co-ordinated planning strategy. Strengthening the roles of Tewkesbury, Bishops Cleeve and Winchcombe as local centres.

Sufficient sustainable housing will be delivered within and adjacent to the urban areas, as well as rural communities to meet the area's need and demand for homes, particularly affordable homes. The provision will be in the context of creating less carbon emissions, producing less waste, recycling more and is protected from flood events.

The area will support a dynamic range of employment opportunities with well balanced and diversified, higher value businesses and an adaptable and skilled workforce. Workplace and resident incomes will compare favourably with the regional average and educational development will be promoted which will bolster and support local resources and strengths. Economic stimulus and growth will be enhanced through improved transport and provision of high-speed broadband throughout the rural locations. Businesses will be attracted to the area by its protected and unique historic and natural environment and the high quality of life on offer.

Travel and congestion will be improved through initiatives that will see improved linkages between Gloucester rail station and the city centre, reduced through traffic in Cheltenham centre and a network of on and off road cycle facilities and walking routes through urban and rural areas. In rural areas opportunities for linked trips to settlements with a mix of services and facilities, market towns and larger urban areas will be maximised.

Development within Gloucester, Cheltenham and Tewkesbury Borough will be accommodated in ways to ensure that the environment is sufficiently robust to adapt to the wider impacts of climate change, including minimising pollution and ensuring availability of water resources. Residents and visitors will have access to a network of green infrastructure in an area that is community focused and well served by public transport. The area's natural beauty and quality landscape, biodiversity, built development and cultural heritage will be enhanced.

**APPENDIX N – DEVELOPING THE SPATIAL OPTIONS: STAKEHOLDERS
AND PARISH COUNCIL CONSULTATION**

Joint Core Strategy – Developing the Spatial Options Stakeholder Consultation (Chapter One of Two)

For further information please contact: Helen
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or info@gct-jcs.org

Requested by: Joint Core Strategy authorities: Gloucester City Council, Cheltenham
Borough Council, & Tewkesbury Borough Council

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1.0 EXECUTIVE SUMMARY

1.1 Introduction

- Gloucester, Cheltenham and Tewkesbury Councils are working together to produce a Joint Core Strategy (JCS) – a key document in the Local Development Framework which sets out the long-term spatial vision for the area and will guide future development up to 2026.
- The JCS team commissioned Vision Twentyone, an independent research and consultation company, to work in partnership with them to facilitate five workshops with a range of stakeholders, with a view to acquiring feedback on the emerging strategic objectives and spatial options.
- Four workshops were delivered on 8th – 10th June, with one delivered by the JCS team alone on the 16th June 2010.
- The primary objective of the workshops was to establish an understanding of the views of stakeholders, gathering feedback on the draft strategic objectives and spatial options. The results of this consultation will provide a key input to the development of a preferred option for the emerging JCS for consultation at a future date.
- The strategic objectives presented to stakeholders were a second draft, the first draft having been consulted on as part of the Issues and Key Questions public consultation phase conducted during 2009-10.
- The spatial options presented to stakeholders were new work, developed in response to the Issues and Key Questions consultation, and before the Coalition Government had announced the abolition of Regional Spatial Strategies. Three spatial options were presented by the JCS team:
 - **‘A strategy focused on achieving resilience to climate change’ – known as the climate change option;**
 - **‘A strategy focused on achieving economic resilience’ – known as the economic option;** and
 - **‘A strategy focused on achieving stronger communities’ – known as the social option.**
- By testing extremes based on the “three pillars of sustainability”, the strengths and weaknesses of each option were highlighted, such that we may understand whether one approach should dominate the JCS team’s approach, or whether to balance the three options in pursuit of sustainable development.

1.2 Methodology

- The workshops were attended by key stakeholders (96 participants), members of the Local Strategic Partnership (LSP) (30 participants) and finally, Local Authority Members (25 participants) from across the three areas.
- The workshops consisted of presentations (from the JCS team, Vision Twentyone and guest speakers), small group deliberative activities, individual thought tasks and plenary sessions. Participants' input was captured on paper as part of these exercises and via electronic voting.

1.3 Key Findings

- Participants broadly agreed with the draft **strategic objectives** set to form the basis of the JCS, with 96% of Members in agreement, together with 83% of stakeholders and the LSP.
- However, approximately 80% of respondents felt the objectives, while broadly acceptable, could be strengthened. The main issue raised for further attention related to housing, specifically the need to provide affordable housing in both rural and urban areas. Other issues that respondents wished to see adequately covered in the strategic objectives include: education and skills; flooding; the role of the Green Belt; regeneration, public transport and the community.
- The second part of the consultation focused on spatial planning and the three **spatial options** listed above. The main issues participants wished to see addressed in spatial planning were: the provision of affordable housing; public transport improvements; planning for flood prevention without compromising economic development; the need to protect local food production and farming; improving the skills base of the workforce in all areas of the JCS; striking an urban/rural balance for development; reassessing the role of the Green Belt; and delivering a cohesive community.
- Suggested detailed improvements to the spatial options included: the provision of broadband in rural areas to encourage home working and therefore decrease travelling. Several participants stressed that the JCS must cater for all age groups.
- Each of the three spatial options were presented in turn and participants asked if they agreed that the option could coordinate development at a strategic level for the benefit of the area:
- **The climate change option:** the majority of participants agreed that this option could benefit the area, with Members showing the strongest support (87% 'strongly' or 'partly' agreed).
- **The economic option:** the strongest support for this option was again shown by Members (79% 'strongly' or 'partly' agreed); however, 40% of the LSP either 'strongly' or 'partly' disagreed with this option as a means to strategically coordinate development for the benefit of the area.
- **The social option:** the majority of participants agreed that this option could benefit the development of the area. Interestingly, 56% of the LSP either 'strongly' or 'partly'

agreed with this option; while, 28% of the LSP disagreed with it, suggesting the social option divides opinion.

- To summarise, when considering each spatial option individually, participants supported the principles of each approach (an average of 65%-67% of the whole participant group either 'strongly' or 'partly' agreeing that the issues discussed under each spatial option could help guide development for the benefit of the JCS area). Participants were then asked to consider the options together. They were asked whether the Joint Core Strategy should deliver a balanced approach combining all three options, or whether one of the three options should be dominant when seeking to guide strategic development across the JCS area. An equal, balanced approach was voted the most popular (attracting 42% of the vote) suggesting that moving forward, the JCS must seek to balance the three pillars of sustainability. In line with current concern over the challenging economic environment, the economic-led approach came second (28%), followed by the community-led (19%) and climate change-led approaches (11%).

2.0 INTRODUCTION

2.1 The Local Development Framework and Core Strategy

Following the introduction of the Planning and Compulsory Purchase Act 2004, Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council are in the process of developing policies for the Local Development Framework (LDF).

As part of the LDF process each council must prepare a Core Strategy - a document that will set out the long-term spatial vision for the area, together with the strategic policies and proposals set to deliver that vision.

Recognising the links between each area and the need for a coordinated approach, Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council are working in partnership to develop a Joint Core Strategy (JCS) – the main Development Plan Document (DPD) that will provide a long-term spatial vision for the area and guide how the three authority areas develop up to 2026¹.

Essentially, the JCS will set out the councils' approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing and employment, key infrastructure, community, leisure and tourism facilities.

As part of the second stage of consultation - Developing the Spatial Options - this report sets out the approach taken and details the outcomes of a series of stakeholder workshops, focusing on the draft strategic objectives and spatial options for development. The feedback received will be used to inform the production of a preferred option, which will form the basis of the JCS.

2.2 The value of stakeholder engagement in the LDF process

A key driver in the LDF process is the involvement of local people in the development and planning system. It is acknowledged that a front-loaded, effective and participatory consultation programme for the JCS will lead to improved policies and proposals, and greater community ownership of the resultant document.

Based on a number of key principles as set out in 4.20 of PPS 12, involvement in the preparation of Core Strategies should be:

- **Appropriate** to the level of planning
- **From the outset** – leading to a sense of ownership of local policy decisions
- **Continuous** – part of an ongoing programme, not a one off event, with clearly articulated opportunities for continuing involvement.
- **Transparent and accessible** – using methods appropriate to the communities concerned; and
- **Planned** – as an integral part of the process of making plans.

The overall consultation programme for the Core Strategy must also adhere to the principles of consultation as set out in the Statements of Community Involvement (SCI) for each three JCS authorities, and with the JCS Consultation Statement of July 2009².

To support this stage of the consultation process, the JCS team commissioned Vision Twentyone, an independent research and consultation company, to plan, coordinate and

facilitate a series of workshops with stakeholders from across the area. Adopting a bottom-up approach, the workshops form part of the preproduction stage of the JCS, involving initial evidence gathering and providing an opportunity to involve those who may be affected by the outcomes of the document in the formulation of the plan. There will be further opportunities for involvement in the production of the JCS in future.

2.3 New Coalition Government – New rules

The Government's abolition of Regional Spatial Strategies (RSS) (confirmed by Secretary of State (SoS) Eric Pickles on 6th July 2010) reinforces the increasing importance attached to the development and application of local spatial plans, in the form of Local Development Framework Core Strategies and Development Plan Documents (DPDs).

The Government believes that it is time for a fundamental shift of power from Westminster to the people, ending an era of top-down government, giving new powers to local councils, stakeholders and their communities to inform DPDs from the bottom up. Drawn up in collaboration with the community, local plans will form the basis of future planning decisions, providing a guide for the overall direction of future development across an area.

Abolition of the RSS removes regional development targets set by national government. However, it does not remove the need to plan for future growth – local housing, employment, environment and community infrastructure needs have not disappeared, but can now be locally determined. The JCS provides a good basis to determine and meet future development needs across the area. Completing the JCS means that any future development will be coordinated, plan-led and evidence based.

At the time this report was published, the JCS team is reviewing its timetable in light of these changes to national policy. Announcements will be made on the JCS website: www.gct-jcs.org.

2.4 Developing the JCS

The JCS is currently expected to be divided into two parts. Part One will include:

- A 'Spatial Portrait' of the JCS area, providing a clear sense of place
- A summary of the key issues faced by the area
- A clear vision for how the JCS area could be in 2026
- Strategic objectives that must be fulfilled to achieve the vision.

Part Two will consist of spatial plans and policies designed to achieve the vision and strategic objectives described in Part One. Work to prepare both parts is in line with the statutory requirements described above and can be summarised as follows:

The JCS 'Issues and Key Questions' consultation document was published for a ten week period of public consultation between 23rd November 2009 and 1st February 2010. This document included a first draft of the four elements of Part One. Representations received during the consultation informed the preparation of a second draft for further consultation with stakeholders and the public; the representations also informed the development of spatial options presented to stakeholders and Parish Councils. All consultations are reported here in Chapters 1, 2 and 3.

The **key issues** presented to participants in this consultation were:

- Self-reliance and relationships between settlements
- The need for urban regeneration

- Declining retail offer
- Increasing demand for housing and particularly affordable housing
- Low skills and poor education attainment
- Job provision, employment and economy
- Deprivation, access to services and healthcare
- Public transport and congestion
- Flood risk
- Natural environment and climate change
- Cultural, leisure, tourism offers and inclusive communities.

The draft **strategic objectives** presented to participants in this consultation were defined as:

- 1) To deliver successful regeneration
- 2) To deliver jobs and a competitive economy
- 3) To deliver new homes to meet the need and demands of a competitive sub region
- 4) To deliver quality skills and education
- 5) Creating access to services and healthcare
- 6) Improve transport and movement
- 7) To reduce the risk and impact of flooding
- 8) Improving and securing an enhanced natural environment
- 9) Improving the resilience to climate change
- 10) Improving culture, leisure and tourism activities.

Three spatial options for development were designed to help explore methods by which the strategic objectives can be fulfilled. These were presented in this consultation and can be summarised as follows:

- **‘A strategy focused on achieving resilience to climate change’ – known as the climate change option**
- **‘A strategy focused on achieving economic resilience’ – known as the economic option.**
- **‘A strategy focused on achieving stronger communities’ – known as the social option**

The spatial options, and consultation responses to them, will be used to inform the development of a preferred option. The preferred option will form the basis of the emerging JCS and be subject to further consultation at a future date before submission to the Secretary of State.

2.5 Purpose of the consultation

Vision Twentyone identified the primary objective of the workshops to be to establish an understanding of the views of stakeholders, gathering feedback on the draft strategic objectives and spatial options, in order to support the overall vision and emerging JCS. In order to meet this objective, Vision Twentyone worked with the JCS team to:

- Organise and facilitate five stakeholder workshop sessions
Publicise the workshops to stakeholders by way of an invite email, reminder email and telephone call
- Design and facilitate the workshops to ensure that they aid understanding, using appropriate interactive techniques, and thus prompting an enthusiastic response
- Prepare this report for the JCS team, which records the views of stakeholders and can be used as part of the robust evidence base to

support the JCS as it moves forward.

The results of this consultation will provide a key input for the development of the strategic objectives and spatial options that will form the basis of the JCS. Public consultation on that work will be announced in due course on the JCS website: www.gct-jcs.org.

2.6 Supporting consultation

As part of this second stage of consultation, the JCS team presented the strategic objectives and spatial options from the stakeholder events to the following Parish Councils between 14th June and 26th July:

Cheltenham area

- Elmstone Hardwicke
- Leckhampton and Warden Hill
- Shurdington
- Swindon Village
- Uckington.

Gloucester area

- Brockworth
- Hucclecote
- Innsworth
- Longford
- Quedgeley
- Twigworth.

Wider Tewkesbury area

- Bishops Cleeve
- Gotherington
- Woodmancote
- Winchcombe



These included all Parish Councils directly affected by areas identified for growth in the abolished RSS, and others who had expressed interest in engaging with this phase of consultation during the 'Issues and Key Questions' stage. Outcomes of these meetings with Parish Councils are included in Chapter of this report.

3.0 METHODOLOGY

3.1 The workshop groups

Five workshops were held between 8th and 16th June with a wide range of key stakeholders, all of whom are important to the formulation of the JCS. These included statutory consultees such as the Environment Agency, plus local businesses, community groups, campaign groups and service providers.

One workshop was held specifically for members of the Local Strategic Partnership (LSP), bringing together representatives from local, statutory, voluntary, community and private sectors.

Finally, a workshop session was held with local authority members, including councillors from Gloucester, Cheltenham and Tewkesbury Councils.

3.2 Recruitment

Potential participants were identified in partnership with the JCS team. An invitation was sent via email encouraging them to take part in the consultation. The initial invite was then followed by a reminder email and telephone call, conducted in order to boost attendance.

The workshops were attended by key stakeholders (96 participants), members of the Local Strategic Partnership (LSP) (30 participants) and Local Authority Members (25 participants) from across the three areas.

3.3 Format of the workshops

Held in Cheltenham, each workshop followed a similar format and consisted of a series of presentations, small group deliberative activities, individual thought tasks and plenary sessions, some of which were tailored to the specific audience:

Introductory presentations were delivered by members of the JCS, guest speakers and Vision Twentyone. Small group activities focused the discussion initially on the strategic objectives; each spatial option was then discussed individually following a presentation aimed at providing more detail on the specific option. The latter provided an opportunity for participants to review the options in turn, highlighting what they felt was missing from each, providing the JCS team with the intelligence they need to begin to develop a preferred option. For example, building on their involvement at an earlier stage in the process the LSP took part in an additional task, focusing in more detail on the content of the strategic objectives.

Following each debate, digital voting technology was used at key points, providing participants with an opportunity to air their opinion on the strategic objectives as a whole, then each individual spatial option. Participants were then asked whether they felt that, in order to guide coordinated development across the JCS area at a strategic level, the Joint Core Strategy should focus on delivering a balanced approach combining all three options, or whether one particular element should be more dominant. An advantage of this method is that it produces instant feedback; charts are displayed in real time which conveys the results of the votes. This method was used to gather a group consensus on the strategic objectives and spatial options.

3.4 A process of continuous improvement

As with any event, it is important to adopt a flexible approach and ensure the process is under continuous review to make sure the activities meet the objectives of the consultation and the needs of the participants. As a result, the questions posed through

the digital vote were refined and minor changes were made to the format of the presentation over the course of the events. This improved the clarity of materials presented and the robustness of the results, without compromising the adopted methodology.

Overall, 129 of the 132 participants who completed the evaluation questionnaire felt the workshop was 'worthwhile' or 'very worthwhile'. All participants felt that the event helped them understand the issues and confirm/develop their thinking about the JCS.

3.5 Report structure

The analysis is split into two sections. The first part focuses on the strategic objectives and suggested improvements to them. The second part examines the three spatial options, indicating which (if any) should be given a higher priority in the development of the JCS and preferred option. Finally, the conclusions explore the overall findings of the events.

Please note: this report should be read in conjunction with Chapters 2 and 3 which present the findings of supporting consultation events conducted with Parish Councils and (online with) the general public.

4.0 CONSULTATION FINDINGS

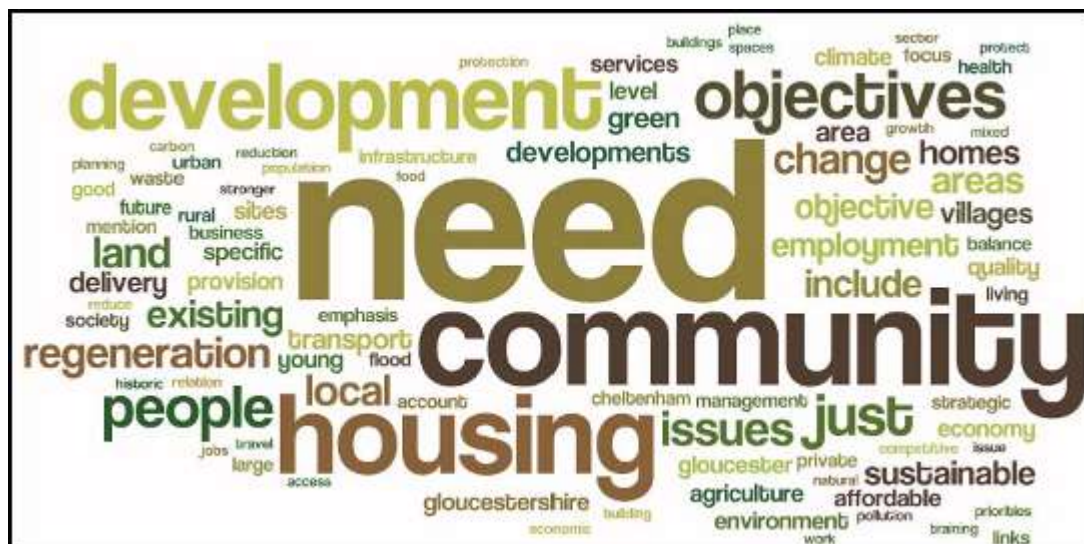
Materials presented at each workshop had a slightly different emphasis depending on the stakeholder group participating, but all followed a similar format. Introductory presentations were provided by Vision Twentyone and members of the JCS team, followed by workshop activities. In addition to the digital vote, consultation exercises included small group discussions, full plenary sessions and space for individual thought time. The digital vote focused on the strategic objectives and three spatial options. The key findings from these exercises are assessed and analysed below.

4.1 Strategic objectives

The first digital vote covered all of the ten strategic objectives. Participants were asked if they agreed with each individual objective in turn. This approach prompted extremely high levels of general support for the objectives at the first event, as well as debate about specific refinements to consider for each. On review of the initial workshop, at subsequent events the activity was refined to a question aimed at determining the level of overall support for the ten objectives as a whole, providing more time to discuss omissions or areas of weakness.

The desire for successful regeneration was paramount, with between 89% - 100% agreeing with each of the strategic objectives. When asked the revised question, each different group overwhelmingly agreed with the strategic objectives, with 96% of Members in agreement, together with 83% of stakeholders and the LSP.

When asked if they thought anything was missing from the strategic objectives, consensus was that whilst participants agree the strategic objectives are the correct ones, there was a number of ways in which they can be strengthened. A summary of participant's suggestions to strengthen the strategic objectives follows: The following 'text cloud' shows the most common words used in written responses to this debate.



In a 'text cloud', the more often a word is used, the larger its size; therefore the largest words show the most common issues. It is evident that the most popular words highlighted by all of the stakeholder groups were: 'need', 'housing', 'development', and 'community', with 'need' being the most frequent. The issue of 'need' related to the provision of housing, with particular reference to the delivery of affordable housing; the 'need to' locate housing near to employment to reduce travel, the identification of development sites and the 'need to' provide for an ageing population. Housing was a key area of debate, prominent throughout the discussions on both the strategic objectives and spatial options. Housing, or more specifically 'how' and 'where' to deliver it was the most popular area of debate for Members.

For the stakeholders no single topic was particularly dominant, as a range of issues were regularly discussed. The following issues were common to all groups and will be discussed in more detail throughout the report:

- The delivery of housing, especially affordable housing
- Delivering jobs in the area and up-skilling the local workforce to access high skilled jobs;
- The environment – specifically flooding and the role of the Green Belt Regeneration and specifically how and where it is delivered
- The provision of public transport
- Delivering a cohesive community.
- Other key issues include: regeneration, public transport, jobs and community. The main element missing from the strategic objectives highlighted by the LSP was 'community'.

4.1.1 Housing The need to deliver affordable housing is paramount. Participants emphasised a need for new housing targets to be devised, of particular importance following the recent abolition of the RSS and the need to ensure a rural/urban balance in delivery. As important, their design must be 'fit for purpose' or 'in keeping' with the surrounding area.

Participants suggested new houses should be located near employment opportunities. If this does not happen participants thought that it would be detrimental to the area. For example, it will increase the need to travel which will hamper plans to tackle climate change. In addition, if an increase in employment opportunities is encouraged without linking this to housing, problems related to a lack of provision could arise.

4.1.2 Jobs Linked to housing, it was seen as imperative that jobs are located in proximity to where people live. In addition, training and further education should be linked to future job provision in the area. Educational attainment was highlighted as an issue that needs addressing and young people need to be equipped with the right skills to acquire future jobs that will be provided in the JCS area.

"There needs to be apprenticeships with local businesses. A long-term turnaround is needed and this can be achieved through better education."

"Ensure skill-base locally is high enough to compete with travelling workers."

4.1.3 Environment The role of the Green Belt was a hot topic for all three groups with significant disagreement on certain issues. Some participants argued that the Green Belt should be redefined and reassessed, whereas others wanted it to be

protected at all costs. Developers found it frustrating that the Green Belt was viewed as sacrosanct and some of the LSP and Members shared this view. However, whilst dominant, this view was not universal.

Another key issue was flooding and, more specifically, the definition of 'flooding' and the validity of the Environment Agency data. Furthermore, some wanted the issue of climate change to be more ambitious, with one suggesting that: "I would like to see a more imaginative and radical approach to tackling climate change not just mitigating effects or coping with it".

4.1.4 Regeneration It was felt that regeneration should not focus solely on the urban areas, but should be more dispersed and include rural areas, smaller villages and any less affluent settlements across the JCS area. Furthermore, it was stressed that the strategic objectives should emphasise the need to encourage local distinctiveness through regeneration projects, reinforcing the individual identities of key areas.

"There needs to be regeneration in villages and this can be achieved through the delivery of affordable homes."

"You should regenerate areas that are currently deprived."

4.1.5 Public Transport

This was an important issue for several participants, with an emphasis placed on the need to provide better quality services throughout the JCS area. A common theme for the three groups, it is evident that participants do not think current provision of public transport services is adequate and as such does not serve the JCS area effectively. This needs addressing and should be a priority for the strategic objectives.

4.1.6 Community The issue of community was a key theme to emerge from the analysis and was of particular relevance to the LSP, who note that the strategic objectives lack an emphasis on the need to achieve a just/cohesive society. It was felt that whilst the JCS is a spatial plan, the need to develop stronger, mixed communities is key to the delivery of a successful JCS. This was also raised by stakeholders and Members, which implies that delivering successful communities needs to be prioritised in the strategic objectives.

"There is no commitment to a just society based on equality of opportunity irrespective of race, religion, age, disability, gender or sexual preference."

"There is no stated commitment to delivering a cohesive society where people understand that if we don't work together we shall fall apart."

4.1.7 Specific thoughts from the LSP Building on their previous involvement in the JCS, members of the LSP had a more detailed discussion on the strategic objectives than other groups, with each table focusing on five of the ten objectives. The support expressed for each objective during discussions is summarised in the table below:

Please note, not all respondents completed every question.

	Agree	Disagree	Partly Agree
1. To deliver successful regeneration	5	0	9
2. To deliver jobs and a competitive economy	5	0	9
3. To deliver new homes to meet the need and demands of a competitive sub-region	5	0	5
4. To deliver quality skills and education	0	0	5
5. Creating access to services and healthcare	5	0	5
6. Improve transport and movement	0	0	16
7. To reduce the risk and impact of flooding	5	0	11
8. Improving and securing an enhanced natural environment	11	0	5
9. Improving the resilience to climate change	6	0	10
10. Improving culture leisure and tourism activities	0	0	16

It is clear that whilst participants agree in part with the strategic objectives, they feel these can be strengthened if their comments are listened to. Interestingly, 16 people answered the questions relating to strategic objectives for transport and for culture/tourism, yet none fully agreed with them.

Connectivity was a key theme to emerge from the workshops and is reflected in the above table, as participants felt this objective could be improved to incorporate a greater emphasis on public transport and links between the settlements in the JCS area. By contrast, there was some debate into the validity of the culture/tourism strategic objective. No one actually disagreed with the strategic objective, however some questioned its relevance to planning and it was not seen to be as important as, for example, the need to deliver new homes or improve the natural environment.

Another important point is that 'enhancing the environment' was the only objective to score higher for 'agree' compared to 'partly agree'. This suggests that participants were content with this strategic objective.

4.1.8 In summary The strategic objectives have been analysed and it is clear that, despite strong support, there are some issues (such as delivering affordable housing and creating a cohesive society) that need to be further developed or inserted into the strategic objectives.

4.2 Spatial options

The JCS team presented three spatial options:

- **‘A strategy focused on achieving resilience to climate change’ – known as the climate change option;**
- **‘A strategy focused on achieving economic resilience’ – known as the economic option;** and
- **‘A strategy focused on achieving stronger communities’ – known as the social option.**

Group discussions on each spatial option are reported individually in this section, followed by analysis of digital voting in which participants had the opportunity to show their agreement with each spatial option, and note which one they felt should play a lead role in the JCS.

4.2.1 Climate change option

This option looks at how the JCS area can develop in a sustainable manner, with a view to enhancing the area’s resilience to climate change. The large stars denote areas of opportunity, with pink rings highlighting the main settlements. Blue shading highlights flood zone areas, with green shading indicating the Green Belt and yellow, Areas of Outstanding Natural Beauty (AONB).

Key policies include a reduction in the need to use a private car and the need to divert development away from flood prone areas.

At the end of the presentation, prior to their small group discussions, participants were presented with the following conundrums or areas for discussion, the purpose of which was to ensure the JCS team gather feedback on the key areas they require:

- How can we achieve resilience to climate change without limiting housing and economic development through the JCS?
- The amount of land required to meet development needs is limited due to the Green Belt – how can the land required to meet the needs of the community be found whilst providing green and open space and Sustainable Urban Drainage Systems (SUDS)?
- Achieving ‘zero carbon’ development is expensive and could impact on the delivery of affordable housing and redevelopment of previously developed land
- Managed retreat from development of flood prone areas could reduce investment in these areas How can we encourage people to use local services when a greater range is available elsewhere by car?

Positively, the stakeholders thought that this option would create numerous community benefits and both the LSP and Members believed that this option illustrates a coordinated approach to address flooding related issues.

Negatively, some participants doubted its deliverability and one stakeholder criticised the approach for not “thinking outside of the box”. The main issues to emanate from the discussions were:

- Flooding and the role of Sustainable Urban Drainage Systems (SUDS);
- Potentially negative impacts on the delivery of affordable housing;
- Improving public transport services throughout the JCS area;
- The importance of protecting local food supplies.

The following section discusses the above themes in more depth.

Flooding

After the floods of 2007, flooding is clearly an important issue for local residents. Sustainable Urban Drainage Systems (SUDS) are an important part of flood defences designed to reduce the impact of new and existing developments on surface water drainage discharges. When discussing this issue in reference to housing, there was a divide in participants' opinions. For example, some felt that SUDS were not effective in this area due to local soil conditions. The LSP and Members felt that implementing SUDS into new housing developments "should be seen as an opportunity not a constraint." A key issue for SUDS was their design – there was general agreement that appropriate SUDS should be planned into new developments from an early stage.

LSP participants thought that the climate change option could be improved by enhancing policies relating to flooding. In particular, they thought that policies could be inserted to ensure SUDS are designed into old developments as well as new.

The impact that SUDs could have on housing was also a concern. Members of all three groups noted that too much emphasis on SUDS could limit the number of new houses being built. Clearly this is a contentious issue as the participants are well aware of the need to mitigate against flooding. However, developing new housing was a key theme highlighted throughout the consultations and its policy should be prioritised

Housing

Eight out of 11 workshop table groups thought that if the JCS has too much focus on climate change, this may constrain the delivery of affordable housing and in turn, this could have a detrimental affect on economic development.

Similarly, caution was aired about the potential knock-on effects associated with the desire to achieve zero carbon developments, with 11 out of 15 workshop table groups noting that this could have a negative effect on the delivery of affordable housing. All three groups, in particular stakeholders, were worried about the cost of this approach and its potential impact on affordable housing. Investing more money to achieve resilience to climate change could result in "less investment in affordable housing."

Housing was a key issue for the stakeholders, LSP and Members. For the majority of participants it was deemed more important (in the short term) than the need to address climate change.

"Affordable housing is a bigger priority." (relative to zero carbon housing).

"We need more affordable housing in places where it is lacking. This should be the number one priority."

Public transport

The need to improve transport provision as part of a strategy focusing on climate change was emphasised. All groups suggested that improvements need to be made to public transport policies and that this spatial option should address this issue in more detail. Stakeholders were of the opinion that by improving public transport, more people will be encouraged to use local services and as a knock-on effect, decrease car usage across

the area. Participants noted that some rural settlements are isolated and the provision (and frequency) of public transport is not acceptable. Until this is addressed, people will still predominantly use the private car as their main mode of transport.

“Better public transport needs to be a more viable option than the car. We have to make transport better to suit people.”

“There needs to be greater investment in quality public transport it has to be a more viable option to the car.”

“Rural services must have adequate quality and good public transport.”

Local food

The LSP felt strongly about the production and protection of local foods and they felt that this was a key element lacking in the climate change option. This was supported by the stakeholder group. Some members of the LSP felt passionately about the need to protect and enhance the use of local food suppliers and it was a mistake that this was not mentioned as part of this option.

Agriculture is clearly a key issue in the JCS area and protecting local food is important for a range of participants.

“The JCS is too urban and it forgets farming.”

“There needs to be a greater emphasis on local food production/food security.”

Digital vote – climate change spatial option

It is evident from the chart below that the majority of the groups support the climate change option. Members showed the strongest support, with 87% either ‘strongly’ or ‘partly’ agreeing that the issues discussed under the **‘climate change option’** could help guide development for the benefit of the JCS area. Whilst key stakeholders generally agreed with the issues discussed under the climate change option, just under one third of them (28%), and a quarter of the LSP (24%), either ‘partly’ or ‘strongly’ disagreed, highlighting a greater range of opinion on this option than seen among Members.

A key message from stakeholders was the need to maintain a balanced approach and “not to become obsessed by one particular issue.” Public transport needs to be embedded into the climate change option. This should also be linked to the need to locate jobs near to housing. If this does not happen, one Member felt “people will come in via the M5 and the local economy won’t prosper.”

In summary

There is a broad acceptance of this spatial option. However, there was caution aired that if this strategy is the most dominant of the three spatial options in the JCS, this could result in a negative economic impact. Whilst participants agreed with the climate change option, it was not deemed as important as, for example, the provision of affordable housing, with one participant noting: “more important things need doing”.

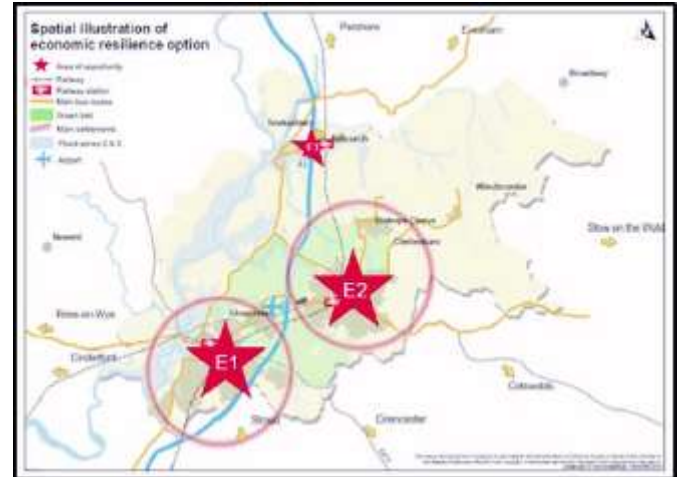
4.2.2 Economic option

This option aims to achieve economic resilience across the JCS area. It is an 'urban-centric' strategy, meaning that new development will be concentrated on the main urban areas such as Gloucester, Cheltenham and Tewkesbury / Ashchurch.

The stars highlighted on the map indicate areas of opportunity, with pink rings used to denote main settlements. Again the Green Belt is shaded in green, with flood zone areas represented by blue shading.

Prior to the group work session, the following conundrums were presented to participants and were used to focus their discussions on the economic option:

- Can mitigation work alleviate risk in flood prone areas that are the focus for development?
- Or should other development options be sought?
- How will focusing development to the west affect the economic resilience of the whole JCS area?
- Focusing development around the M5 may encourage commuting to other areas. How do we encourage people to stay in the area?
- If economic growth is pushed, should this be supported by an increase in housing?
- Does the capacity exist to provide the supporting infrastructure to deliver an urban centric strategy?



Participants noted one advantage of this approach is that it could drive regeneration and create funds for other projects. However, an over reliance on this approach could have a detrimental effect on rural communities, and flood risk in the urban areas would be a major restraint on such targeted development.

Key economic issues centred on:

- The importance of locating jobs in proximity to housing;
- Up-skilling the local workforce in all communities in the JCS area;
- Striking a balance between urban and rural areas;
- The role of the Green Belt;
- Infrastructure and public transport are stifling economic development.

Housing

The stakeholders cited a preference for good quality housing so that the JCS area has a: “...range of housing to meet all needs. There has been too much concentration on low-cost housing, also need good quality to attract all groups of people.”

Echoing the findings from the climate change option, all groups felt that housing should be located near to employment. This was a recurring theme. Additionally, there was a preference that unless there is “housing before jobs, it will create out commuting.” This is an issue that needs to be addressed or else it could have a negative affect on the local economy. Comments included:

“Employment and housing links are vital.”

“The provision of housing has to meet employment needs.”

“It is crucial that you account for a growing population and the increasing need for housing. There is a need for affordable homes and the delivery of housing has to service towns and villages.”

Education and skills

Participants said that an increase in jobs will need to be matched with an increase in skills of the local population. Crucially, these skills need to be tailored to jobs that will be created in the area. The JCS needs to outline what jobs are likely to be prominent in the future so schools and colleges can improve the skills of residents to ensure they can access these jobs. In addition, there needs to be a strategy to improve the skills of all communities living in the JCS area. People from deprived communities cannot be ignored and it is imperative that they have the opportunity to access better jobs that require higher skills. Comments to this effect included:

“Train where there will be jobs!”

“Ensure people in disadvantaged areas have the skills to compete for jobs.”

“[We] need an up-skilling of the workforce.”

Urban/rural balance

All three groups wanted a coordinated and balanced approach, noting that if development is focused on the ‘urban west’ of the JCS area, this would have a negative impact on the ‘rural east’, with the majority of the tables in agreement. Those remaining felt that in the long-term the whole area could benefit. Nevertheless, there was a strong feeling that the JCS should not neglect rural areas. This is an important issue as “rural communities are become increasingly unbalanced and unsustainable.”

A balanced approach was considered essential - participants felt that alone, the economic option may fail to deliver this. Caution was noted that if the economic option led the development of the JCS it could exacerbate the gap between urban and rural areas. Inter-relationships between urban and rural areas are required and it needs to be specified “how the growth of the urban core can support the county.”

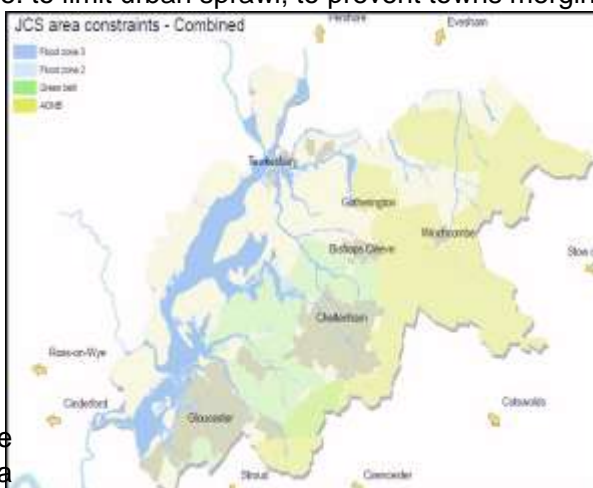
“There is a need to sustain rural settlements e.g. Winchcombe.”

“A mix is needed. You should not place 'all eggs in one basket'. Do not focus on the urban at expense of rural.”

“Need to avoid over focus on the two major urban centres.”

Green Belt

The original goals of the Green Belt were: to limit urban sprawl; to prevent towns merging into one another; to safeguard the countryside from encroachment; to preserve the setting of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land (PPG2). The Green Belt within the JCS area has had mixed success in achieving these aims. It is a valued local resource that attracts strong feelings and significant controversy.



A range of participants from all three groups felt that the Green Belt was a constraint on economic development in the JCS area: “if it weren’t for the Green Belt, which is where we would put sustainable, mixed-use development.”

The role of the Green Belt was a major aspect of debate and many participants felt that it was hindering housing development and economic growth in the JCS area. However, it should be noted that many other participants believed that the Green Belt should not be altered. Despite differences in opinion, there was a consensus that the Green Belt could be improved.

“The Green Belt should be reassessed.”

“We are constrained by the Green Belt to develop the urban areas.”

“The Green Belt should be made greener and more accessible. Enhance it and use it.”

Public Transport

Stakeholders identified a lack of provision for infrastructure and transport as major barriers to delivering economic development – a point supported by the LSP and Members. Only 2 out of 12 workshop table groups thought that there was enough provision for infrastructure in the JCS area to support an urban-centric approach. Stakeholders, LSP and Members were unified in thinking that current transport provision, and in particular public transport, is not acceptable and this needs to be addressed through the JCS. One Member stated that “transport links are not good enough.” Public transport needs to be improved because:

“The job prospects of residents living in high density affordable housing aren't good and it's a long way to travel to places to work. We are in danger of creating a more deprived area.”

Furthermore, some of the Members felt that this option could make a positive contribution to the need to tackle climate change, noting “we don’t want people becoming more car dependant so we need to focus jobs in urban areas.” This option delivers this, which was favourable amongst a lot of participants.

Digital vote – economic spatial option

Again, broad support was shown for this option. Members were the group showing strongest support: 79% either ‘strongly’ or ‘partly’ agreeing with it. Among stakeholders and the LSP, there was general support but a greater range of opinion than seen among Members: 60% of stakeholders either ‘strongly agree’ or ‘partly agree’ with the economic option, but 30% either ‘partly’ or ‘strongly’ disagree.

Among the LSP these figures are 56% (positive opinion) and 40% (negative opinion).

The key issues to emerge from this option were the need to assess the role of the Green Belt and provide additional infrastructure, in the right places, to support new housing development. Positively, this option “addresses our biggest issue at the moment” (the economy) and according to one member of the LSP:

“Everything has to be paid for and this is the only option that will do this.”



In summary

Crucially, the economy is the “immediate issue affecting people’s lives” and this urban-centric approach was viewed as most likely to improve the economy. Furthermore, this option could bring wider benefits as “economic success will drive other aspects of the JCS through.” Participants were aware that the recession could have an impact on the JCS and one noted that:

“In the current economic climate there is a need to focus on the economy – ignore it at your peril.”

Nevertheless, it is “unacceptable to deny the rural centres opportunity for enhancement” and this was the main concern for this spatial option.

4.2.3 Social option

The social option focuses on delivering stronger communities through the provision of housing and jobs in accessible locations across the JCS area – and particularly in the more deprived areas.

Again, looking at the visual representation of the spatial option, the stars denote areas of opportunity, pink circles highlight main settlements, green shading indicates Green Belt and dark blue shading, flood zone areas. In addition, light blue indicates areas within the most 10% deprived (Indices of Multiple Deprivation) and pink, the next 25% most deprived.

To inform the deliberations the following conundrums were presented to participants,

aimed at providing a focus to the small group discussions:

- How can the policies contained within the JCS ensure mixed/ balanced communities across the area when some locations have no, or limited, existing development opportunities?
- How can employment opportunities be provided where opportunities for development are limited?
- Would the removal of the threshold for affordable housing provision stifle small scale developments on previously developed land?
- The social option focuses development on rural settlements which have three or more key services; is this a reasonable approach?
- How can the most appropriate community facilities for new developments be identified?

The main advantage of this option, noted by stakeholders, is that development will be dispersed across the region and is inclusive. Moreover, the LSP liked the option because it will help deliver strong and mixed communities. However, there were concerns about how this option could be delivered in a time of public spending cuts and an uncertain economic climate. The main issues arising are:

- The need for mixed communities that cater for all age groups;
- Delivering affordable housing throughout the JCS area;
- The isolation of rural areas – can selected settlements act as service hubs for the benefit of others, and if so, which ones?

Community

The need for mixed communities - of all social backgrounds and demographics - was viewed as crucial. It was stressed that the JCS team need to bear in mind that there is an ageing population residing across the JCS area, whilst also catering for the needs of young people. In addition, the changing demographic profile of the area may also have an effect on housing need and associated infrastructure/service provision. This is important for housing, but also for the community. There need to be facilities for young and old people. However, it was felt that there is more to a community than simply facilities and the JCS needs to focus on how community spirit can be fostered and restored. Positively, the LSP was impressed that this option would help to achieve a fairer society and benefit a wide range of people.

“More emphasis needs to be given to developing ‘stronger communities’, not just providing community facilities”.

“Create networks through integrated facilities.”

Housing

Again, housing was a dominant issue for discussion – the main point was the need to deliver affordable housing throughout the JCS area via a mix of housing types, across urban and rural locations.

Green Belt

In line with discussions relating to both the climate change and economic options the

Green Belt was viewed as a constraint, particularly in relation to the provision of housing and infrastructure required to sustain communities, with Green Belt to the north of Cheltenham not seen to be as effective as Green Belt separating Gloucester and Cheltenham. It was noted that there could be potential to reassess allocation of the Green Belt to meet future housing demand. One stakeholder noted that there is a “need to look critically at the Green Belt as some areas have to be brought back into the [development] equation”. This was mirrored by many participants’ opinions with housing delivery, in particular the need to deliver affordable housing, viewed as a crucial issue. “There needs to be a mix of housing types and tenures in all settlement locations.” “You should build affordable housing in areas throughout the JCS.”

Accessibility

Transport was again raised as an important issue. However, the focus this time was placed on the need to locate new development on accessible routes. It was suggested that development also needs to be located in deprived areas or “on corridors that deprived areas can access.”

Distribution of development

Focusing development on rural settlements with three or more primary services was seen as a sensible approach (eight out of eleven workshop table groups concurred with this strategy). However, the qualitative data suggested three was not enough and five would be a better approach. The groups thought that rural settlements with more services should be made more accessible. One participant urged the JCS team to be bold and “look at [a] successful example - identify what makes them tick” and learn from them. “Rural services must be a quality and good service”. “You need to think beyond urban areas when addressing transport needs i.e. connections to rural hinterland”.

Digital vote – social spatial option

As with the first two digital votes, broad support was shown for the option, with strongest support among Members, and a greater range of opinion among stakeholders and the LSP. 79% of Members, 67% of stakeholders and 56% of the LSP either ‘strongly’ or ‘partly’ agreed that the social option could help guide development for the benefit of the area. However, 28% of the LSP disagreed with the option, and significant numbers in all groups voted ‘neither/nor’ or ‘neutral’ for the first time (notably among Members who had never previously selected the neutral vote).

It should be noted that where individuals disagreed, it was mainly because they felt that the option was in need of some enhancement to ensure it meets the needs of the area and will help guide future development effectively.

In summary

There was a positive response to the underlying aims of the social option, mainly because it was the best spatial option for striking an urban/rural balance. However, a number of participants questioned if it could be delivered.

“Ideally a great option, but how can it come to fruition?”

The different groups liked the spatial option, but they were not convinced that it could lead the development of the JCS on its own. Other common suggestions that would enhance this option were the provision of broadband in rural areas and the encouragement of home working. Stakeholders believed that community spirit was vital and was an omission from the spatial option that needs rectifying.

4.3 Policy Priorities

A series of issues, similar to those relating to the strategic objectives emanated from the deliberations, including:

- The provision of housing
- Public transport / accessibility problems
- Flooding
- Local food production
- Improving skills
- Striking an urban/rural balance
- The role of the Green Belt
- Delivering a cohesive community.



Reinforcing the issues noted above, the text cloud below⁵ illustrates key terms used when participants were asked to discuss policy priorities related to the delivery of all three spatial options. It reveals similar results to the analysis of key issues deemed to be missing from the strategic objectives outlined in section 4.1.



'Housing', 'employment' and 'community' are three of the most popular policy areas suggested by participants. 'Provision' is the most common word used and is usually related to the delivery of housing and services in each of those three areas. Above all, it will be important to ensure that provision meets the needs of the community both now and in the future. Housing was the main issue arising through the analysis of comments on the strategic objectives and was a focus of discussion under each of the individual spatial options. Clearly, housing is a major issue for all stakeholders and they view it as crucial to the development of the JCS.

The discussions further emphasised the importance of housing affordability, and stated that housing numbers should be based on need, and not Government targets. With the demise of the Regional Spatial Strategies (and their housing targets) there is an opportunity to deliver more bottom-up planning. The participants want more consultation on the provision of housing to ensure it is delivered specifically to meet the needs of a community.

The text cloud also highlights 'Green Belt' as a policy priority, which reflects the discussions in each spatial option as described above. Moreover, 'balance' was another popular word. This was stressed throughout the workshops by all three groups and points to a desire to achieve a balanced approach through the JCS.

Looking at policy priorities relating more to specific spatial options: flooding and transport were key priorities for the climate change option, whilst housing was the main priority for the economic option, and community was the dominant issue for the social option.

In summary

One of the aims of the consultations was to establish which spatial option (if any) should lead the development of the JCS. The following pie charts highlight strength of agreement on each individual spatial option, taking all three participant groups as a whole (i.e. bringing together the views of stakeholders, Members and the LSP). While all had specific benefits and limitations highlighted by participants with respect to their fields of expertise (for the LSP and selected stakeholders), or their understanding of public viewpoints (for Members), it is clear that all the spatial options were popular, with two thirds of the whole participant group either 'strongly' or 'partly' agreeing with each spatial option. This suggests that participants want an approach that can balance the needs of economic, social and environmental objectives.

4.4 Guiding Principle

As a final test, after each of the three spatial options had been discussed in some detail, participants were asked specifically if they felt any one of the options should guide the JCS, or if all are of equal importance.

Taking each participant group individually, the stakeholders marginally favour the economic option in leading the development of the JCS, but also place a high priority on taking an 'equal' or 'balance' approach.

The LSP strongly favoured the 'equal approach' in this particular vote, despite earlier debate centring on the benefits of the social option.

The Members also opted for the 'equal approach'. However, the preferences shown in their overall results have a smaller range, and their strength of preference for the 'equal approach' (38%) is perhaps offset by the significant and even (25%) support for the economic and social approaches.

In summary

Again, a balanced approach to sustainable development of the JCS area is the most desired option, reiterating the support shown for the spatial options when considered individually, as illustrated in the 'average group' figures presented in Figure 4. Crucially,

the need for a balanced approach was emphasised throughout the workshops with stakeholders, LSP and Members alike. This is shown in the averages for the three groups where an equal approach had a 42% share of the votes, beating the concept of any single option being dominant in the JCS.

In some part, the levels of support shown for the remaining three options reflects today's political debate and news agenda, with concern for the UK's economic difficulties beating social issues, which in turn beat the less-tangible (to some people) threat of climate change. However, taking a full synopsis of the day, this does not suggest that participants were any less passionate in their debates when discussing issues relating to the social or climate change options.

5.0 CONCLUSIONS

A wide range of opinions have been gathered through the workshops. These will be used to inform the development of the JCS. Numerous issues were discussed and there were significant areas of agreement (for example, the importance of housing issues and the need to improve public transport links throughout the JCS area). There were also areas of contention (for example, the role of the Green Belt), highlighting the different views held by a diverse group of participants. Nevertheless, some common themes emerged from the consultation as follows.

5.1 Strategic Objectives

- Participants were in broad agreement with the strategic objectives.
- The majority of participants thought the strategic objectives could be strengthened in some areas, with 80% (the average for the three groups) noting that there was something missing from the draft presented. The most common areas for development were: affordable housing; the role of the Green Belt; regeneration; jobs; and community.
- Specifically, participants cited a need for affordable housing to be delivered in rural as well as urban areas, with only small scale development in rural areas. Some wanted the Green Belt to be protected; conversely others wanted it to be reassessed to help deliver housing.
- Jobs need to be located where people live and regeneration needs to be in keeping with the local area.
- The JCS should seek to deliver a just and cohesive society.

5.2 Spatial Options

The main finding from the spatial options was that balancing the economic, social and environmental objectives is pivotal to the successful delivery of the JCS. This is reflected in the guiding principle result (see Figure 6) where the average for the three groups was 42% in favour of an equal balance of the three spatial policies.

Significantly, the need to 'strike a balance between competing priorities' was a key theme emanating from all three groups' discussions. A balance between urban and rural is viewed as an essential part of the JCS as the "scale of change should be bigger in urban areas, but not at the expense of rural areas".

Moreover, there needs to be a balance between policies relating to the economy, climate change strategy and the need to deliver a sustainable community.

5.3 Specific Findings

To conclude, participants thought that future spatial options should include more detail on:

- If/how to re-assess the Green Belt to see if/where it could accommodate housing
- Provision of affordable housing across the JCS region that is appropriate to the scale of the area
- Skills creation and how these skills will relate to future jobs provision
- Improving public transport.

Suggested improvements included:

- Locating jobs in proximity to housing to decrease the need to travel
- Specifying how cohesive communities will be delivered
- Emphasising the importance of local food production and protecting the farming industry in general
- Supporting the provision of broadband in rural areas to encourage home working and reduce travelling.

5.4 Recommendation

After extensive analysis, it is evident that the main message emanating from the consultation is the need to take a balanced approach to preparing the JCS Part Two, to ensure the sustainability of a cohesive community. Finally, one stakeholder summed up pertinently the findings of the workshops:

“All options are equally important, but how they are balanced will be key to the success or failure of the JCS”.

Developing the Spatial Options – Parish Council Consultation

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2.0 A strategy focused on achieving resilience to climate change – ‘the climate change option’

3.0 A strategy focused on achieving economic resilience – ‘the economic option’

4.0 A strategy focused on achieving stronger communities – ‘the social option’

5.0 Locally-specific issues

6.0 Outcomes/Conclusion

Appendix – notes taken at Parish Council meetings

- Shurdington Parish Council
- Brockworth Parish Council
- Bishop’s Cleeve, Woodmancote and Gotherington Parish Councils
- Hucclecote Parish Council
- Uckington, Elmstone Hardwicke and Swindon Village Parish Councils
- Innsworth Parish Council
- Twigworth Parish Council
- Quedgley Town Council
- Longford Parish Council
- Leckhampton and Warden Hill Parish Councils
- Winchcombe Town Council



Parish Council Meetings Report

1.0 Introduction and Methodology

1.1 Introduction

The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The JCS will be a co-ordinated strategy guiding how the three authority areas develop up to 2026. It will set out the Councils' approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing, employment, infrastructure, community, leisure and tourism facilities.

Preparing a Joint Core Strategy means making choices about how the area will develop, so it's important that local communities are involved and have a say in the future of their area. To ensure the JCS incorporates local concerns and meets Government tests of soundness, consultation exercises (such as that reported on here) will occur throughout the strategy's development.

The finished JCS is currently expected to be published in two parts. Part 1 will include:

- A "Spatial Portrait" of the JCS area, providing a clear sense of place
- A summary of the "Key Issues" faced by the area
- A clear "Vision" for how the JCS area could be in 2026
- "Strategic Objectives" that must be fulfilled to achieve the Vision.

Part 2 will consist of the spatial plans and policies designed (in response to the JCS evidence base and all consultation) to fulfil the Strategic Objectives and therefore achieve the Vision.

This report documents a series of meetings with Parish Councils where options for developing Part 2 of the JCS were explored.

- Chapter 1: Developing the spatial options – stakeholder consultation
- Chapter 2: Developing the spatial options – parish council consultation

Together, these documents will inform the preparation of "Developing Options" which will be published for public consultation in summer 2011.

1.2 Methodology

Meetings were held with 16 parish and town councils between 14th June and 26th July 2010. Meetings were held with those parishes which were most affected by the Areas of Search proposed in the South West Regional Spatial Strategy, together with any parish specifically requesting a meeting.

The meetings were attended by JCS Officers, Development Control Officers and Parish/Town Councillors. The purpose of the meetings was to discuss the three spatial options presented during the stakeholder conferences in June: the Climate Change Option, the Economic Option and the Social Option. By testing these three extremes, the JCS team aimed to identify the strengths and weaknesses of each, and to see whether participants favoured an approach dominated by any one of the approaches, or an approach which seeks to balance the three. More detail is provided on all three of the spatial options in Chapter 1 but is not repeated here.

In writing this report, comments documented at the meetings have been grouped together rather than reported upon individually so as to enable patterns of consensus and opposition to

be seen. Where locally-specific comments were made, these have been listed separately. The notes taken at each meeting are provided as appendices.

This report has been divided into three parts. First, the three spatial options are addressed in turn showing areas of consensus, opposition and issues which require clarification. Second, locally-specific comments are listed. Finally, conclusions are drawn.

PLEASE NOTE: The report provides a synopsis of the consultation undertaken and the issues raised, and not a detailed response to all representations.

2.0 CLIMATE CHANGE OPTION

2.1 Background

This option looks at how the JCS area can develop in a sustainable manner, with a view to enhancing the area's resilience to climate change. Key policies include a reduction in the need to use a private car and the need to divert development away from flood prone areas. Further information is provided in Chapter 1.

2.2 Support

Although this option received the least feedback, the vast majority of that feedback was positive. Participants felt that there are limits to the capacity of the environment, and population growth is significant in taking us closer to that capacity – the JCS should therefore seek to address growth in a way that enhances the area's resilience to climate change. Aspects of the approach that received broad support included:

- **Transport:** transport infrastructure was seen as a key issue in achieving resilience to climate change. Respondents called for an improved bus and rail service (more trains to stop at Ashchurch station) and a light railway serving the area. Support was expressed for placing employment and housing in close proximity, with good public transport and urban design, to increase walking/cycling and to reduce reliance on the private car.
- **Services:** support was expressed for maintaining rural services to increase the sustainability of rural settlements and reduce the need to travel for such services (particularly when people work longer hours and need convenience). The concept of a network of rural service hubs was supported but seen as difficult to implement due to the convenience of the car and people's freedom to travel for greater choice and value.
- **New development:** improvements to social infrastructure and energy efficiency were seen as vital outcomes of any new development, in particular large-scale housing projects. Support was given for new development being built-to-last with high insulation standards and local renewable energy schemes. The need to generate much higher proportions of renewable energy was linked to the issue of 'peak oil' which some respondents felt was close or even past.
- **Flooding:** respondents placed a high priority on flood issues, with strong support for a precautionary approach to flood risk and use of Sustainable Drainage Systems (SuDS).

2.3 Opposition

There was little opposition to this option, though concern was expressed for how the infrastructure requirements would be paid for. It was also recognised that, although there is a desire to meet 'zero carbon' targets faster than current Building Regulations require, the prospect of the development industry achieving this appears too visionary and challenging.

2.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the climate change option:

- **Green belt:** the continued separation of settlements by green belt was seen as important, but it was acknowledged that some new development is required in the area and must be sustainably located. Some parts of the green belt were considered to be sustainable locations due to their access to transport and services. Clarification was therefore requested regarding the future role and form of the green belt.

- **Food security:** agricultural land was viewed as under pressure and in need of protection: the area's ability to produce its own food, instead of relying on imports, was seen as important in the context of future climate change. The JCS area has little Grade 1 agricultural land so it was seen as important to protect Grade 2 agricultural land – and to promote allotments and small-scale local food production.
- **Flooding:** solutions to this problem were acknowledged as expensive and sometimes radical, and requiring political support and the involvement of multiple agencies. Respondents requested clarification on what can realistically be done to combat flooding.
- **Waste:** respondents felt that waste should be disposed of close to where it is generated, thus reducing the need to transport it for disposal and increasing personal responsibility. Incinerators were rejected in favour of high-tech, smaller, local disposal facilities.
- **Reducing the need to travel:** respondents recognised difficulties in encouraging people to work close to their homes and to use local services, when there may be better opportunities, value and choice elsewhere; the reality of car ownership, use and parking must be acknowledged therefore. Control of parking spaces in new developments was variously seen as a good way to restrict car-use, and a waste of time.

3.0 ECONOMIC OPTION

3.1 Background

This option aims to achieve economic resilience across the JCS area. It is an 'urban-centric' strategy, meaning that new development will be concentrated on the main urban areas such as Gloucester, Cheltenham and Tewkesbury / Ashchurch. Further information is provided in Chapter 1.

3.2 Support

This option was received positively due to its focus on addressing problems in the economy – something most respondents expressed great concerned about. Aspects of the approach that received broad support included:

- **Employment:** support was expressed for providing a mix of employment opportunities, to encourage people to live and work in the area, concentrating employment in existing centres with priority given to filling vacant facilities before building new ones. Respondents acknowledged a need to protect existing employers (including heavy industries) while promoting service and high-tech industries, and recognised that attracting new sectors may require major infrastructure investment during difficult economic times.

Respondents considered that investors will only be interested in attractive sites. Gloucester Business Park was cited as an exemplar for new development, providing a good mix of units in a well-designed and landscaped area (though not without its faults – many jobs are part-time and many manufacturing jobs have been replaced by service industries). It was suggested that a science park could be developed on similar lines.

- **Education/training:** respondents supported increasing the number of apprenticeship opportunities, and strengthening the link between education and employment, ensuring that educational and vocational courses provide people with the correct skills for local employment now and into the future.
- **Housing:** support was expressed for providing affordable housing in accordance with the needs of local people, and in association with the creation of new job opportunities. Associated social infrastructure must be in place early in the development cycle, not left to the last minute or forgotten. Support was expressed for home-working, which was seen as dependent on improved broadband infrastructure across the JCS area.
- **Transport:** high quality public transport (including better rail links to London) and full access to junction 10 of the M5 were seen as important to this spatial option. However, doubt was cast on people's willingness to abandon the private car.

Respondents felt that existing communities should be protected from commercial traffic created by mixed use development.

A declining retail offer, combined with the high cost of parking/Park & Ride, was seen as a deterrent to people visiting and spending in the area.

- **Environment:** respondents supported the need for open spaces, the separation of settlements, and the protection of agricultural land. Some respondents expressed support for small-scale development at urban/greenbelt fringe locations, only if such works were shown to be sensitive to the area and could provide a positive contribution to landscape enhancement and social infrastructure.
- **Flooding:** respondents recognised that the majority of brownfield sites in Gloucester's urban area are at risk of flooding. It was felt that sites in lower risk areas should not be

overlooked as these may make a positive contribution to economic development with appropriate flood mitigation measures. Investment in flood defences was supported.

3.3 Opposition

Although this option received much support, there was concern that rural areas would gain little (rural services may in fact decline), and commuting levels would be high (with associated traffic and environmental problems). Objections were also raised to any further southwards expansion of Gloucester, and to any erosion of the character of central Cheltenham and historic Gloucester prompted by such an urban-centric development strategy.

It was felt that the JCS area requires a mix of housing types/tenures and at present there is a dearth of family housing which would be hard to deliver in appropriate quantities on constrained urban sites.

3.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the economic option:

- **Planning policy:** debate occurred about the extent to which the planning system should control development (in the case of major growth areas), and the extent to which it is a barrier to development (in the case of commercial sites which have been empty for long periods but are prevented from conversion to housing).

Focussing development in the urban areas (as detailed in this option) may restrict development opportunities in rural areas which would not then benefit from Section 106 contributions. Respondents felt that the distribution of planning gain across the JCS area required clarification under this option.

- **Employment:** clarification was requested on how businesses can be attracted to the area and where they will come from. Respondents felt the JCS should have a flexible approach to employment uses and planning policy should not be seen as a barrier to investment. While there was a preference for re-using existing empty sites before developing new ones, it was recognised that 'high value' jobs are hard to attract and often prefer purpose-built, out-of-town business parks to town centre locations.
- **Transport:** respondents felt that development should be concentrated to support the use of public transport, walking and cycling, and that the role and scale of Gloucestershire Airport should be considered under this option. Park & Ride schemes were popular if priced and managed properly to encourage use and limit the impact on existing communities.
- **Housing:** respondents generally supported the abolition of Regional Spatial Strategies and the JCS authorities' decision to calculate housing (and employment) need locally. It was recommended that housing growth calculations should be transparent, justified and based on local need (e.g. families, the elderly) and should provide for a proportional increase of the existing stock rather than absolute numbers. New 'edge of urban sites' (if required) should be phased in line with regular reviews of housing need. Some saw development of these sites as preferable to a 'new town'.

Concern was expressed over the prevalence of buy-to-let properties and second homes; the poor quality/design/character/safety of new market and affordable housing; and the provision of rural affordable housing to those with no connection to the area.

- **Flooding:** respondents were sceptical of whether flood-prone urban development sites could be made safe via mitigation measures without increasing risk to surrounding areas.

4.0 SOCIAL OPTION

4.1 Background

The social option focuses on delivering stronger communities through the provision of housing and jobs in accessible locations across the JCS area – and particularly in the more deprived areas. Further information is provided in Chapter 1.

4.2 Support

This option received strong support due to its focus on addressing deprivation, seen as affecting people's lives on a daily basis. The option was described by one respondent as “the logical choice” as they felt that little can be done to stop climate change and current economic problems are too big to be addressed on a local scale. Aspects of the approach that received broad support included:

- **Development strategy:** respondents accepted some ‘natural growth’ to settlements; supported the use of brownfield in preference to greenfield sites; and wished to maximise the use of empty/under-occupied properties across the JCS area. Support was expressed for creating strong communities and using the JCS to address deprivation. Likewise for the dispersed pattern of development and network of rural service hubs suggested by this option. Respondents wanted any major new development to provide infrastructure to meet the requirements of new residents *and* resolve existing deficiencies.
- **Housing:** as before, the need for a mix of dwelling types and tenures was supported. It was felt that affordable housing should be dispersed within new developments and should not be segregated to one area (though others suggested owner-occupiers do not wish to live next to social-rented properties). Concern was expressed that existing rural communities may become dormitories unless affordable homes are provided to maintain a demographic spread. Local authorities were seen by some as better providers of affordable housing than private developers. Support was given for the provision of new public open space as part of any new development.
- **Employment:** respondents echoed the issues relating to employment, education and training described in section 3.2, above. It was suggested that Section 106 contributions may address training and employment as well as more traditional areas of spending.

4.3 Opposition

Opposition to the social option centred on the impact of major growth areas on existing settlements. Concern was expressed for the quality of urban design in new developments, and their poor integration with existing communities (e.g. through over-use of three-storey houses where two-storeys is the norm, or through poor walking and transport connections). Piecemeal development of isolated estates should be avoided, and design should be sympathetic to existing areas. Many respondents opposed the development of back gardens (‘garden grabbing’).

4.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the social option:

- **Development strategy:** respondents felt that development must be in keeping with local character, the capacity of the road system and social infrastructure. However there was uncertainty over how infrastructure requirements and existing capacity can be determined, and why planners perceive one site to be more/less suitable than another.

Respondents supported the principle of a strategy for retail/supermarket development (both in- and out-of-town) aimed at protecting town centres and independent stores.

Debate occurred around the need to support rural services, balanced against the quantity of development that may be required to do so in any particular village (perceived as frequently higher than local residents may like to accept). Clarification was therefore sought over what the thresholds are for service support/provision as related to new development. The objectives of this option were seen as potentially conflicting with the aspirations of smaller communities who may not want the additional facilities associated with new development. Consultation must occur at all stages from policy development to planning application.

- **Transport:** respondents suggested that transport modelling is undertaken based on different times of the day and different days of the week, and that information gaps in public transport provision could be addressed by consulting local users and taxi drivers.
- **Affordable housing:** confusion was expressed over the definition of this term, with some respondents viewing it as low-cost market housing rather than the 'professional' definition of the term (social rented housing, part-ownership schemes, etc). Respondents supported a flexible, site-by-site approach to affordable housing targets to secure delivery.
- **Stronger communities:** there was some confusion over the definition of this term and what it means in real terms.

5.0 LOCALLY-SPECIFIC ISSUES

The information below consists of specific comments made by parish councils which could not be generalized but are still relevant to the development of the JCS.

Bishop's Cleeve, Woodmancote and Gotherington

- Debate occurred over the status of Bishop's Cleeve within the settlement hierarchy. Respondents viewed it as a village with "no major services", not a town, and said it should be considered to be outside the Cheltenham sphere of influence as shown on the spatial options map. Woodmancote was described as reliant on Bishop's Cleeve for services and infrastructure, and lacking in land suitable for employment use.
- Request made for:
 - More bungalows (with associated services and healthcare) to cater for the elderly.
 - Improvements to the Bishop's Cleeve-Cheltenham cycle route (which currently ends at the racecourse).
 - Protection for the greenbelt between Bishop's Cleeve and Gotherington.

Brockworth:

- Recent new development in Brockworth was seen as having had minimal success in reducing car usage – indeed pressure has been increased on Ermin Street, the only road in and out of the area.
- Residents were described as resistant to more new housing in Brockworth. Recent new development was described as having little infrastructure to support it.
- Concerns were expressed over local schooling. Brockworth Secondary School is in special measures so parents do not want their children to go there and are moving out of the area or making their children travel elsewhere (with associated traffic problems).

Hucclecote:

- Respondents opposed further new housing as recent development and allocations include land right to the edge of the AONB – "there is no further space".
- Hucclecote is viewed as a village, which orientates itself towards Cheltenham for services primarily due to the perceived poor environment and retail offer in Gloucester City. There is concern that Hucclecote is becoming a dormitory for workers elsewhere.
- Whittle Square is viewed as having potential for restaurant/café/retail improvement.

Innsworth

- Innsworth was viewed as having a functional relationship with Gloucester (which provides the majority of facilities and services), while maintaining a separate identity. Respondents were opposed to Innsworth coalescing with Gloucester.

Longford:

- Concern was expressed over poor local service provision due to proximity and good bus services to Gloucester city centre.

Quedgeley:

- Two out of five Councillors expressed support for development in the green belt between Cheltenham and Gloucester as a sustainable option for growth (green belt was seen as already devalued here relative to other areas).

Shurdington:

- Respondents suggested there was local willingness to accept a quantity (unspecified) of local development provided it is in the right place. Further consultation is required on the possible scale and location of such development.

Twigworth:

- The Parish Council disagreed with flood zones defined by the Environment Agency and recommended that local flood knowledge should form part of the evidence base.

Uckington, Elmstone Hardwick and Swindon Village:

- The Parish Councils did not express support/opposition for any of the options, nor did they suggest any option which should dominate.

Winchcombe:

- The Parish Council supports the climate change and community spatial options in preference to the economic option.

6.0 CONCLUSION

The consultation exercise was successful in highlighting the benefits and problems of the three spatial options, and of highlighting some strengths and weaknesses of each. When presented *individually*, all three options received broad support while having specific issues highlighted for clarification. When respondents were asked to consider all three options *together* and to decide whether one option should be dominant in the JCS, or whether a balanced approach should be pursued, the latter (balanced) approach was the preferred way forward for those who expressed a preference. This finding complements that of the stakeholder consultation events presented in Chapter 1.

Criticisms of the consultation exercise centred on the terminology used: 'spatial options' was seen as confusing by some respondents, since the 'options' presented were viewed more as cross-cutting issues within broad themes. It was also suggested that costs and deliverability were inadequately presented in the exercise, making it harder to make a choice between options. This, and the specific issues reported above, should be considered for future consultation exercises.

Finally, it is important to note that many of the issues reported above under a particular spatial option apply to the other two spatial options as well. Therefore, it is vital that the JCS team considers the report as a whole when progressing/balancing the spatial options, rather than focusing on individual elements.

Feedback from Shurdington Parish Council meeting 14.06.10
6pm – 7.15pm
Shurdington Social Centre

Attendees: JCS team – Claire Cullen-Jones, James Hartley and Paul Skelton. Parish Council – J.A. Sobey, J. Chandler, T.B. Colbeck, M. King, S.J. Mitchell, M.C. Stewart, P.D. Surman

General requests/comments:
Shurdington Parish Council to be notified when TBC SHLAA is published and notified of any brownfield opportunities within the village
Debate occurred on how the JCS objectives will be measured. JCS team advised that the JCS will be accompanied by a monitoring framework.
PC queried whether there will be a green belt view for Tewkesbury since the options may impact on GB.
PC queried whether the JCS team is working with Cotswolds DC since the water which affects Shurdington is coming off the Cotswolds Escarpment.
PC queried what grounds the council has to say no to TBC allocation SD2: what would be the planning reason to turn it down?
JCS team advised that SD2 is an allocated site, whilst waiting for the RSS is no longer a valid argument, the issues of it being prejudicial to the preparation of the JCS and being in advance of the evidence remain the same. It is likely that an application for land within CBC and SD2 will come forward this September.
The Local Plan and emerging JCS will be the framework for considering applications, taking account of any population projections which are expected from the county council. However, it is important to note that the projections will be trend-based and there will still be work for the councils in considering the policy implications related to future levels of growth.
PC considered that the urban extension location proposed in the former RSS was on the edge of the village: this would increase numbers of people but have no real relationship to the village. PC considered that it would be preferable for the village itself to receive a quantity (unspecified) of development.
JCS team advised that the proposed RSS urban extension should be viewed as part of Cheltenham rather than Shurdington, but point taken for reference (NB: subsequent abolition of RSS means JCS will look again at growth locations).
Climate Change Option
Recommend that Grade 2 agricultural land is mapped and that the option clarifies the characteristics of both grades and considers whether Grade 2 could also be protected. Particularly relevant seeing as not much Grade 1 within the area.
Economic Option
Does this option fit with the digital broadband strategy for the UK which is looking to enable more people to be able to work from home – so would you need the urban focus?
Should be a focus on improving rail links to London. Transport links general, public transport and park and ride are all important.
Linkage of education is important and is something that is missing nationally. Are our courses providing people with the right skills for employment?
Should be looking at how to enable development and remove barriers rather than trying to actually do everything through the plan – should recognise some areas – education etc are not the responsibility of local authorities.
Could look at the idea of developing a 'science park' which could be based around Dowty/Aerospace industry.
Not just looking at employment but also apprenticeship opportunities etc.
If you live in the JCS area and spend money here, is it a problem if you work elsewhere?

Feedback from Brockworth Parish Council meeting 21.06.10
11.00am – 13.00pm
Brockworth Community Centre

Attendees: JCS Team – Tim Watton, Claire Rawlings, Georgina Woods and Oliver Rider. Brockworth PC: Jim Hunt, Carole Neal, Jude Perez.

Economic Option

Rural areas won't get much from this option, but there are less people there anyway so not too much of an issue. They will have to commute and they are heavily protected by rural residents, with little infrastructure in rural areas to support development.

Concerns that people will continue to use cars and won't use bus or cycles. Development should be concentrated to support public transport. There is new development in Brockworth but people still travel by car. There is not enough parking provided but this has still not discouraged people using their cars. We need to look long-term.

Stronger Communities Option

Tewkesbury Borough Council is aiming for 30-35% affordable housing. It was suggested that Bishops Cleeve is having a meeting to say that they have had enough affordable housing. Brockworth PC feels that they have had enough affordable housing too.

Commented that the houses are built but without the infrastructure to support them. But it was appreciated that there needs to be a lot of houses to support services, but residents don't want the development. They want affordable housing regarding the price, but they don't want social housing. It was felt that people don't want to live next door to social housing.

It was felt that this was the logical option as there is not much we can do about climate change and the economy is poor.

Climate Change Option

It was felt that agricultural land is disappearing and that this is a big issue for the area. We won't be able to support the development and population. Dairy herds are disappearing, due to supermarket price demand. If there was a major disaster we would struggle to support the population. We must reach a point when we can't do anymore, when we have reached the environmental limits. It was felt that population increase is the cause, as Brockworth had little development but there have been large amounts of development and growth in recent years.

The green belt should prevent Gloucester and Cheltenham merging, but news development needs to go somewhere. It was felt that we would struggle to ensure people used their local services.

General Comments

No more housing ss wanted in Brockworth. It was felt that Stroud District is putting its housing in Brockworth, but there is no infrastructure to support it. Jobs are being lost but there is still more housing being built. Where are the jobs for these residents? At Brockworth people can easily get on the motorway and go to Bristol.

North Brockworth is agricultural land. There is a need to keep our food production as we rely on imports.

Feedback from Brockworth Parish Council meeting 21.06.10
11.00am – 13.00pm
Brockworth Community Centre

Brockworth Secondary School is in special measures so people don't want their children to go there and are moving out of the area for a better school. Or people would prefer to travel out of the area rather than go to the local school.
All development in or around Brockworth puts pressure on Ermin Street as it all has to use this one road to get in and out of the area.
It was felt that there was a need for more manufacturing, or we will become a nation of shop keepers, as we don't produce or make anything anymore.
There is a need for more public open space, there is no park in Brockworth. Invista are proposing development on play / sports area. It was felt that the gardens and environment at Coopers Edge is good.

Feedback from Bishop's Cleeve, Woodmancote and Gotherington Parish Council 24.06.10
7.00pm – 8.30pm

Attendees: JCS Team – Tracey Crews, Claire Cullen-Jones, John Hinett from JCS team. Bishops Cleeve PC: Peter Lightfoot, Ann Lightfoot, Geoffrey Jackson. Woodmancote PC: Judith Wray, Charles Kaye.

General requests/comments:
Housing needs – there is a need for more bungalows within the area (particularly Tewkesbury Borough) to cater for the needs of the elderly. Need to ensure that bungalows are provided and that the appropriate services and healthcare are provided also. Suggest consulting with the PCT, GOOPA and Age Concern.
JCS team advised that the Strategic Housing Market Assessment will provide information on the type of properties considered and under PPS3, we are able to indicate the mix of housing type and tenure on sites. Also consulting with the PCT and Age Concern, will look into GOOPA and be aware of the issues when considering options.
Will the JCS look at the Government's commitment to bringing empty homes back into use?
JCS team advised: yes, each council produces an Empty Homes Strategy and long term vacant properties are recorded on Council Tax records. The number of empty properties is monitored.
What will the JCS policy be on Green Belt be? If Green Belt stays the same, what will happen to proposed housing sites? JCS shouldn't consider development within the Green Belt. What would the position be if the JCS did identify developing in the Green Belt?
JCS team advised: As part of the JCS process the local housing and employment need will need to be decided, this level will then inform discussions surrounding the range of sites required.
The Interim Housing Strategy needs to be reviewed.
Bishop's Cleeve shouldn't be included within the Cheltenham sphere as shown on the spatial option maps.
Access routes and restrictions should be shown on maps
Character of Tewkesbury is different to that of Bishop's Cleeve
Should not have the position of 'leap frogging' to the north of Bishop's Cleeve because of Green Belt.
What happens to applications 'in the pipeline', decision on Innsworth will be an important one.
JCS team advised: We have a duty as statutory planning authorities to consider all proposals submitted as planning applications, with each application considered on its merits. In light of the abolition of the RSS the planning context has significantly changed and this would need to be taken into account.
The Sustainable Communities Act gives local people a greater role in the process and includes the need to consult with Parish Councils. Parishes would request that they be given their own power to determine their future within the JCS process.
Parish Council would like more involvement in JCS process.
Economic Option
If we want to attract business into the area, need to improve transport routes and M5 junctions. Need to change traffic priorities.
Main traffic corridors should be shown on maps

Feedback from Bishop's Cleeve, Woodmancote and Gotherington Parish Council 24.06.10
7.00pm – 8.30pm

There are numerous vacant properties and with Headquarters leaving Cheltenham, where is this option envisaging these businesses will come from? Can the JCS allow for more flexibility for employment uses to ensure that planning is not a barrier?
Would need to be a major change in infrastructure to attract new sectors, should fill vacant properties first
Is it possible to significantly change infrastructure? What can we do for empty properties?
Stronger Communities Option
People are choosing to live in Bishop's Cleeve even with no major services, it's like a village.
Need to consider whether the smaller areas can accommodate development and also whether they would want those additional facilities.
Not fair to continue putting development at Bishop's Cleeve.
Need to consider the viability threshold for facilities
There is a risk that smaller communities may lose their identity with new housing estates being developed around the periphery.
It can be safer to use the car in some instances where developments are segregated by a main road.
There is a good bus service from Bishop's Cleeve to Cheltenham
Woodmancote would find it difficult to identify land suitable for employment use. Woodmancote relies on Bishop's Cleeve for infrastructure.
Requested to be engaged in the settlement audit
There is a problem with young people in Bishop's Cleeve not being able to afford housing. Would like to see a priority for providing local people with affordable homes. Could exception sites be provided?
Need larger affordable housing
Could consider settlements for development under this option to be ones which want infrastructure/growth, such as Stoke Orchard
Environmental / Climate Change Option
Cycle route from Bishop's Cleeve to Cheltenham stops at the racecourse. Route should be improved.
Railway infrastructure – there is a good service from Ashchurch which could be improved by more trains stopping at Ashchurch.
Building on arable land is not sustainable.
Would like advice on what future development might look like. 2.5 storey developments is a big concern for Bishop's Cleeve.

Feedback from Hucclecote Parish Council meeting 28.06.10
6.30pm – 8.30pm
Pineholt Village Hall

Attendees: Claire Rawlings, James Hartley and Oliver Rider from JCS team. Mrs Pat Grant-Hudson, Mrs Barbara Martin, Mr David Martin, Mr Rob Jefferies in attendance from Hucclecote PC.

General requests/comments:
Hucclecote PC felt there was no room to expand as nearly everything outside of AONB was allocated. There were also issues associated with the area becoming a dormitory for workers elsewhere. There were concerns over the amount of cars using the residential streets for parking for the business park. Also concerns over the current proposed units which are above 2 storeys – this is seen as inappropriate for a rural edge area. They feel they are a village but seen as an urban area.
Top three wish list for improvements to Hucclecote: (i) No housing above 2 storeys, (ii) Better community facilities, (iii) Better bus links to Cheltenham and Gloucester – only runs from main road through Brockworth and Hucclecote.
The Parish also suggested that they orientate themselves towards Cheltenham and look to it for services primarily due to the poor environment and retail and services offer in Gloucester city centre.
Economic Option
Should not mitigate or build on areas that flood
High value jobs are hard to attract to the area and those that are attracted often want to be on business parks and not in the town centres or elsewhere.
The existing Gloucester Business Park is a good model of how to build them. It has a good mix of units and is beautifully landscaped. However, the business park has a lot of part-time workers and a lot of manufacturing has closed to be replaced by more services.
The area has other problems including lack of family housing. There has also been a historic problem of not providing the required infrastructure before development.
Must accept some development in Tewkesbury (town) otherwise it will die. But some growth also needs to be given to Gretton and Greet to sustain them.
Stronger Communities Option
Infrastructure needs improving to cater for increased demand e.g. road linkages to hospitals – these will still only be in the larger centres possibly a long way from the other settlements
Real problem of how you create a stronger community with stronger facilities – Cooper's Edge was originally designed to have a small high street but the Tesco scheme came along and this was dropped. Need to attract niche retailers not Tesco etc. How can we stop butchers / bakers from shutting in our existing areas let alone in a new centre where they have not even opened? There is hope however, that the Whittle Square scheme at Brockworth / Hucclecote could deliver a café bistro culture in a cosmopolitan square.
Climate Change Option
Infrastructure is key. More and more people work longer hours or shift patterns – in the rural areas people will still need access to 24-hour services as they can get in some urban areas. Minimum is longer bus services (24 hours if possible). How do you get people to shop locally at things such as the farmers' market when it is 10% dearer (or more) than the supermarket.
Closing Comments
Hucclecote Parish Council wants to get to zero carbon as soon as possible but stronger communities option is preference. Economic option brings problems for Hucclecote Parish.

Feedback from Elmstone Hardwicke, Uckington and Swindon Village Parish Council meeting 29.06.10
7:00pm – 8.30pm
Montpellier Room, Cheltenham Borough Council Offices

Attendees: JCS Team – Tracey Crews, Alex Herbert and Joan Desmond. Elmstone Hardwicke PC: N. Allen, M. Troughton, Ken Preece. Swindon Village PC: Peter Allen. Uckington PC: S. Haublyn, Kathryn Oakey, Teresa Rooney, Martin Beirne, Mike Griffiths. Cheltenham BC: Cllr Bernard Fisher, Justin De Vries (observer), Rachael Adams (observer).

General requests/comments:

Several of the PC participants were expecting the JCS team to present new growth projections and locations for the JCS area at this meeting, in response to the recently announced abolition of the SW RSS. This had not been the team's intention (such work will not be ready for some time – timetable to be determined), and it was unclear how the expectation had arisen. The situation was explained and participants were given a short, verbal summary of the intended presentation, then asked if they wished to proceed with the meeting. The meeting went ahead, albeit with only periodic reference to the presentation prepared – the bulk of the time being spent on a general discussion of the development issues facing the JCS area, and specifically NW Cheltenham.

General housing/development issues

- Affordability and availability of existing houses are both important local issues. Affordable housing should be located within new developments.
- Local Authorities should build affordable houses, not developers. The profit margin is not there for developers to build affordable housing.
- PCs would like any new urban extensions or major growth areas to integrate with existing communities, rather than forming separate communities.
- Concern was expressed over existing villages becoming dormitories / retirement villages unless affordable homes provided for other demographics. However, strong concern also expressed over the nature of and need for growth. RSS approach strongly opposed – broad support for 'localism' approach advocated by new Coalition Govt.
- PCs feel they have been ignored and their views not taken into account in relation to the former-RSS's proposed NW Cheltenham urban extension.

Sustainable Transport

- Park and Ride schemes – existing communities suffer when cars park in nearby streets to avoid paying for P&R. Increase of car fumes.
- Protect existing community from commercial traffic created by new mixed-use development. Development should be scaled down when approaching existing villages.
- S106 contributions from major new developments should benefit existing local communities – not just the proposed developments.

Stronger Communities

- CBC requires over 900 affordable homes in the next 5 years.
- Social implications:
 - Single person households in large houses;
 - More elderly people;
 - More single parent families
- Need to maximise use of empty properties in Cheltenham – local Cllr advised that empty RSL properties are generally filled within 5 days, worse scenario is 5 weeks. Need to maximise use of other empty (non-RSL) properties remains.

Economic Resilience

- Most brownfield sites in Gloucester urban area have high flood risk.
- All 3 boroughs in JCS flood. If you cannot build in flood-risk urban areas, then building in the Green Belt is the only other option. PCs preferred to

Feedback from Elmstone Hardwicke, Uckington and Swindon Village Parish Council meeting 29.06.10
7:00pm – 8.30pm
Montpellier Room, Cheltenham Borough Council Offices

mitigate flooding issues to enable development in urban areas.

- There are many existing buildings in the town centre which are empty and could be converted into houses. Employment policies currently prevent this. See last bullet above.
- No shortage of employment premises. Policies should perhaps be more relaxed to prevent premises becoming empty.

While each of the three spatial options were touched upon during discussions, the JCS team were not able to go into detail on any of them, and the PCs therefore did not express support/opposition to any of them, nor did they suggest any option should dominate.

Attendees: Anouska Francis, Adam Gooch, Paul Skelton from JCS. Chris Hunt (Innsworth PC), Steven Riddick (Twigworth PC), Bill Whelan (Innsworth)

General requests/comments:

BW requested that a message be passed to Maiden that publicly available information be kept more up-to-date as often it can be several years old.
BW asked if, during future consultation events, an event could be held in Churchdown.
It was requested that all Parish Council's should be notified of the publication of the consultation report in writing.

Part 1

Objectives - it was questioned why Churchdown and Brockworth were not identified as having high deprivation. JCS team explained that those wards identified in Part 1 as suffering from the highest levels of deprivation were done so through official IMD research and these were found to be within the highest 10% most deprived wards in the country. JCS team highlighted that not mentioning a ward in the portrait did not mean its needs would be ignored.

Respondents felt that the EA Flood Maps were often incorrect. In addition, local knowledge of floodplain needs to be taken into account.

Affordable housing - it was asked that a full definition of affordable housing could be provided in future publications.

It was considered by attendees that Innsworth has a functional relationship with Gloucester - the people of Innsworth use Gloucester for the majority of shopping, facilities and services - but Innsworth retains a separate identity and the idea of coalescence with Gloucester was not supported. It was considered the situation in Churchdown would be different, probably 50/50.

Stronger Communities Option

Concern was raised that many of the objectives of the option conflict with the aspirations of some of the smaller communities (i.e. the villages) - the very people that the option was designed to 'help'. Natural growth of rural settlements is important. The type and mix of affordable housing very important, not just the quantity.

Down Hatherley was felt to be suitable for some small scale infill development.

It was considered that the use of primary services as a tool for identifying a settlement hierarchy was simplistic. The services need to be identified with quality of service seen as far more important than quantity. The suggestion of the establishments of service 'hubs' in rural areas was supported.

Generally the aspirations of this option were supported though there was concern about how it could be delivered in practice.

Preference for parish councils to negotiate facilities at planning application stage via S106 rather than being prescribed at site allocation stage.

Economic Option

General support for ensuring that development is concentrated on existing centers. There should be a mix of employment opportunities to encourage people to live and work in the area. The need to protect existing industries was highlighted - particularly the 'harder' industries - the JCS should not try and lever in higher-end service industries at the expense of existing harder industries.

Sites within the lower flood risk areas (particularly central regeneration areas in Gloucester) should not be ignored as they could make a positive contribution to economic development through the application of flood mitigation measures. Investment in appropriate flood defenses should be made.

The aspiration of creating a top quality public transport system was supported but the point was made that to a certain extent the quality of the service doesn't matter - it will never be able to compete with the private car. Education of young people to walk/cycle was seen as more important than infrastructure to enable people to do so.

Support for small scale development at urban/greenbelt fringe locations. Sensitive small scale development could be positive as could contribute to landscape enhancement or 'greening the greenbelt'.

Housing numbers should be based on community needs rather than planning for in migration, the increase should be based on a proportional increase of the existing stock rather than adding excessive numbers.

Feedback from Twigworth PC Meeting 05/07/10
Twigworth Church, 7-9pm

Attendees: Adam Gooch, Anouska Francis and Oliver Rider from JCS team. George Sharpley (Twigworth PC), David Joy (Down Hatherley PC), Steven Riddick (Twigworth PC), D Clayton (Twigworth PC), J Hird (Twigworth PC), V Gardener (Twigworth PC).

General requests/comments:
<p>Part 1</p> <ul style="list-style-type: none"> Those present wanted to register objection to the EA flood zones and recommended that knowledge of local people form part of the evidence base. It was felt that no one had adequately defined the flood plain especially frequency and timing of flood events. Some discussion occurred around the SFRA Level 1 evidence base and how this would be used in the future. Elements of the SFRA Level 1 map for the area were felt to be incorrect. Development in rural areas needs to be of a scale in keeping with the capacity of the road system and other infrastructure. It was asked how infrastructure requirements for new development would be determined. JCS Officers set out the role of SIDP. Clarification was sought on the weight that can be attributed to the JCS now and as we move through the process. Officers explained at present very little but more as we go through the process and options are refined.
<p>Economic Resilience Option</p> <ul style="list-style-type: none"> Concern was raised over the flood mitigation techniques utilised under this option as it would have the impact of pushing flood water downstream where it could cause greater harm. Support for maximising the use of brownfield land. Support objective of protecting greenbelt - would help protect good quality agricultural land which would have a positive impact on the economy. If all development needs could not be accommodated on brownfield land in the city and town centres additional land should be utilised on the edge of the main urban areas rather than looking at a new town option. Though this shouldn't be around Twigworth. If new edge urban area sites are required then serious consideration should be given to phasing - perhaps in accordance with reviews of housing need. Public transport provision would need to be seriously improved under this option. The shelved Elmbridge Parkway would have been ideal. However it is always going to be difficult to get people out of their cars.
<p>Resilience to Climate Change</p> <ul style="list-style-type: none"> Support the principle of requiring much higher proportions of renewable energy in new developments. This option looks at placing shops, services and facilities in closer proximity to local communities - but what power do the LPAs have in making this happen? For example, the NHS is moving towards 'polyclinics' and won't entertain smaller community services. From the perspective of Twigworth Parish Council, the priority of affordable housing was fairly low. Flooding was a much greater priority. Should be pushing for low-cost market housing rather than the planners' definition of affordable housing.

Feedback from Quedgeley TC Meeting 08/07/10
Quedgeley Community Centre, 7-8.30pm

Attendees: Tim Watton and Alex Herbert from JCS team. Quedgeley PC: Anna Mozol, Graham Smith, Nicholas Lee, Julian Powell, Roger Langston

General requests/comments:
<p>Part 1: Strategic Objectives</p> <p>Broad support expressed for strategic objectives. Limited time to comment in detail during meeting, but PC will endeavour to respond in detail online. Support expressed for joint-working across the JCS area.</p>
<p>Economic Resilience Option</p> <ul style="list-style-type: none"> • Support expressed for JCS addressing job provision, and helping improve deprived urban areas • Support expressed for regeneration of Gloucester city centre • Concern expressed over continued southwards expansion of Gloucester • Concern expressed over impact on rural communities of this option • Concern expressed over public transport provision ever being good enough to support this option. • Two out of five Councillors expressed support for development in the green belt between Cheltenham and Gloucester as a sustainable option for growth (green belt seen as 'already devalued' here)
<p>Resilience to Climate Change Option</p> <ul style="list-style-type: none"> • Existing inefficiencies need to be addressed in parallel to setting standards for new development – e.g. insulation of existing housing stock, loss of power in transmission etc. • Support expressed for placing work and housing in close proximity • Support expressed for initiatives to limit car use – e.g. through improved public transport, through urban design, through land-use planning etc.
<p>Stronger Communities Option</p> <ul style="list-style-type: none"> • Support expressed for JCS addressing strong communities and pockets of deprivation • Deprivation was viewed as affecting people's lives on a daily basis (e.g. Quedgeley has suffered from decline in manufacturing industries and resulting unemployment), therefore this option was seen as having significant importance • Good urban design seen as important in supporting strong communities – link areas of new development to existing urban areas to avoid piecemeal development / isolated estates; provide adequate social infrastructure to provide for new residents and resolve existing deficiencies
<p>Conclusion</p> <p>Strong support expressed for the overall strategic objectives, the three spatial options, and the consultation content and strategy. All three spatial options seen as important: the JCS must strike a balance. However, the Climate Change option is being addressed most effectively by national policy, meaning local policy could focus (to some extent) on Economic and Social options. However, the emphasis was on balance across the 3 options.</p>

Feedback from Longford Parish Council, 14/07/10
7.00pm – 8.30pm

Attendees: Adam Gooch, Claire Cullen-Jones and Paul Skelton from JCS team. Longford PC: Janet Jenisch, Lynn Gough, Peter Gough, Brendan McNerary, Malcolm (no surname provided on sign-in sheet)

General requests/comments:
JCS should clearly explain where the three spatial options have come from. Should consider the wording of options to ensure it is understandable to the public. Should also be careful with use of acronyms
Location of supermarkets on the edge of towns is OK for people who drive, but what happens for older people/those who can't drive?
What is happening with relationship with Stroud? Why aren't they included? JCS team advised that Officers are in contact with Stroud and via County work on infrastructure, cross boundary issues are being identified and picked up. JCS team to consider whether this relationship needs to be publicised.
Respondents felt that Cheltenham, Gloucester and Tewkesbury will all merge in time.
All options should include costings as otherwise it gets people's hopes up. JCS team advised: A Viability Assessment will accompany later stages of the document. At this stage the options are only being formed and consulted upon with stakeholders. To avoid costly work which may be altered at a later stage, it is not appropriate to undertake costings at this time, but take the point that it is a vital factor in the decision making process to ensure that options are viable and realistic.
There is a lack of option/development space in Tredworth
Economic Option
Think that the JCS will be economically driven because of the current climate. Reference to employment, thinking about 'Big Society' proposals, should also address the voluntary sector as well. Reliance on people.
Stronger Communities Option
Need to take account of ageing population
Need to include a section on safety – fear of crime – actual and perceived. Cycle routes, open spaces – do they feel safe? Will they be used?
Doesn't include info about the structures in place for a person to do the work themselves, this is a Big Society focus and this option should be linked.
Need to provide more allotments, even if larger gardens are also provided because of the social benefits of allotments
What would the proposed mix of housing be? JCS team advised: mix would be based upon local evidence taken from the Strategic Housing Market Assessment and the Housing Needs Assessment.
Would the quality of market and affordable housing be the same – would you be able to tell the difference? JCS team advised: no, there should be no differences in design quality between market and affordable housing. Currently, affordable housing has to meet a higher Code for Sustainable Homes standard than market housing.
Do not support people having affordable housing in rural areas if they do not live/have a connection there.
Should look at restricting Buy-to-Let and second homes – do Cotswolds DC have a second homes policy? Rental properties do have a place to play within the market and provide an element of choice for people who can not/do not wish to buy. JCS team to consider how Cotswolds DC addresses the issue of second homes.
Climate Change Option
Flooding is an issue for Longford, however solutions are expensive and radical proposals would need political support and a number of agencies

Feedback from Longford Parish Council, 14/07/10
7.00pm – 8.30pm

involved. Therefore, what could realistically be a flood outcome for Longford?
Would recommend that all development is away from flood risk areas.
Focus on SUD's/drainage, however when considering future impact of climate change, need to also consider the need to save water as well as may be likely to have more water shortages
Waste should be disposed of as near as possible to where it is generated, not have to travel across the county. Incinerators are not only option, however should encourage more local disposal of waste. Series of smaller facilities. JCS team advised: County Council responsible for Waste Core Strategy, however, JCS team to consider as part of spatial options.
Should consider building more flats as will run out of land eventually. Consider flats would be preferable to higher density housing, as long as the facilities/infrastructure is provided with them – recycling facilities, retail, parking etc.
Should be building to last
Longford is near enough to Gloucester City Centre, they have a good bus service which is good, however it also means that it is difficult to get services in Longford as it is too close to the city. There is a community facility (church) in Twigworth.
Like the idea of a network hub – but consider that it doesn't work in practice. Car use is very convenient.

Feedback from Leckhampton & Warden Hill Parish Council meeting 13.07.10
7.00pm – 8.30pm
Brizen Young People's Centre

Attendees: Tracey Crews, James Hartley, Oliver Rider and Craig Hemphill from JCS team. Paul Ryder, Yve Jowett, Anne Regan, Adrian Mears, Allan Knight, Denise Rand, Peter Lynch and Amanda Winstone in attendance from Parish.

General requests/comments:
<ul style="list-style-type: none"> The Parish wanted to know what the position was on the new county housing / population figures and would there be any input from the community or would this be decided by the county and/or the 6 districts. JCS team explained that we would not be going back to a structure plan arrangement. At the moment the discussions are around what methodology to use but the key is that this has to be agreed between the 6 districts and the county otherwise the basis of the projections will be inaccurate.
<ul style="list-style-type: none"> Without the RSS – who is the JCS now responsible to? There is a political imbalance between and even within the councils. How will difficult agreements be arrived at when push comes to shove over issues such as where development will go? JCS team suggested that there may need to be some form of arbitration but it was not clear at this stage. There is a commitment from all 3 authorities to the JCS however.
<ul style="list-style-type: none"> Gypsies, Travellers and Travelling Showpeople provision was discussed. How can the councils stop spurious and cynical applications which arrive on a Friday evening with communities then moving onto a site over the weekend? JCS team set out that the JCS will allocate sites and in doing this it will help to reduce the issues of historic under-provision and therefore it should cut down on the unauthorised use of sites. Also: where there are sites being used which are unauthorised, the enforcement teams from Tewkesbury have worked hard, including over weekends, to work on getting the group off the site.
<ul style="list-style-type: none"> There was a query about the vision and how there could be lots of visions. How is the final vision decided on? JCS team advised that a consensus would hope to be reached as with all consultation. The consultation on this is currently taking place until 9th August
Economic Option
<ul style="list-style-type: none"> There is not enough focus on vocational training. Support open spaces but also recognise the need for employment
<ul style="list-style-type: none"> Need to avoid building ghettos with rat-runs that can't be policed. Instead need to build communities that have ownership. If you build a nice development, people will want to live there and communities will develop. Tacking development onto the edge of existing communities will just merge areas together.
<ul style="list-style-type: none"> Where will development go? Need to look at the airport. Cheltenham is an attractive town; this should not be eroded. Tourism has a primary role, retail can feed off this.
Stronger Communities Option
<ul style="list-style-type: none"> Need to make provision for migrants population; both housing and jobs. Don't forget about local needs e.g. declining retail offer. Post office is an essential service. Businesses need to be sustainable. Need to sustain manufacturing industry. Should focus on hi-tech and design industry e.g. Oxford Science Park as a best practice example. Look at what are viable industries. Other brownfield areas should be identified. S106 need to think creatively, not just traditional uses e.g. look to provide training for staff as part of employment development

Feedback from Leckhampton & Warden Hill Parish Council meeting 13.07.10
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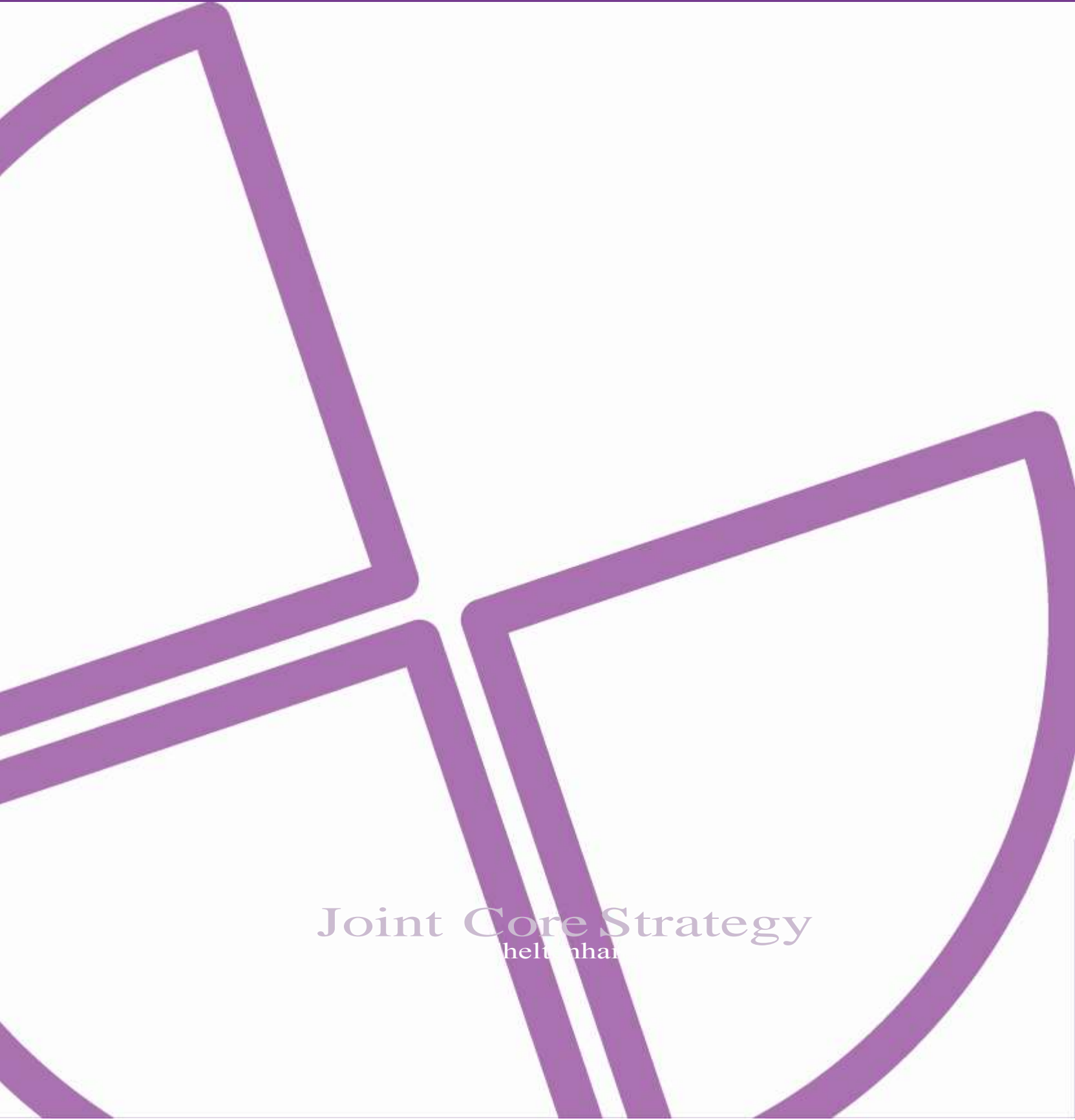
• Apprenticeships should be supported.
• Care Homes may bring in wealth e.g. Painswick example however, it is difficult to deliver affordable housing in these sorts of schemes.
Climate Change Option
• Green/environmental issues and climate issues appear to be mixed up. Need to define exactly what this objective is.
• Focus on low carbon
• Need to recognise that there is a problem where main rivers meet.
• Need to meet zero carbon targets but doing so by 2016 is already looking challenging so accelerating this is not a good idea.
• Should implement a light railway scheme for the area.
• Need to achieve local employment if this option is going to work.
• We need to take account of peak oil.
• Investors will only be attracted to key and attractive sites. Brockworth Business Park should be seen as an example of best practice.
• Declining retail offer is an issue along with parking charges in the town centre and park and ride too expensive also.
General
• Use of terminology spatial 'options' is confusing. Suggest wording is changes to issues. JCS has not presented options, but a range of cross-cutting issues within broad themes.

Feedback from Winchcombe TC meeting 26/07/10

Winchcombe Community Centre, 6-8pm

Attendees: JCS Team – Anouska Francis, Alex Herbert and John Hinett. Winchcombe PC: Kevin Willett, Cairnime Lea, Sue Sturgeon, Ron Harrison, Terry Willett

General requests/comments:
Part 1: Strategic Objectives <ul style="list-style-type: none">• Backland and garden land development was a concern. Need to ensure that physical access onto the site is suitable.• Concern was expressed that time periods for responding to consultation documents was inadequate. A minimum of eight weeks for consideration is required with some notification of the consultation period to be highlighted. Email notification of consultation is the preferred method.• All present were reassured that consultation on the JCS is viewed as a continuous process and any comments made until pre-submission would be taken into consideration. Issues and concerns at an early stage would help to shape the policies being developed.
Economic Resilience Option <ul style="list-style-type: none">• Focussing development on Tewkesbury/Ashchurch, Gloucester and Cheltenham would mean that there will be few development opportunities and S106 contributions for other areas. How could the planning gain be distributed across the area under this spatial option?• Design approaches for building on flood prone areas should be explored.
Resilience to Climate Change <ul style="list-style-type: none">• Small scale renewable energy generation should be incorporated into all new development.• Reality of car ownership in rural areas must be acknowledged. Adequate parking provision is needed in all new development regardless of public transport accessibility. Not providing parking spaces puts unfair pressure on existing residents.
Stronger Communities Option <ul style="list-style-type: none">• Services in Winchcombe are comparable to those in Bishops Cleeve but local employment opportunities are lacking. Focus should be on improving public transport access to existing employment opportunities in Cheltenham, Bishops Cleeve and Tewkesbury/Ashchurch rather than attempting to rebalance Winchcombe into an employment centre.• Caution should be used in defining the quantity and mix of affordable housing in new development as it can make development unfeasible. Instead of applying a percentage across a wide area, JCS policies should focus on examining the mix of housing existing and required in the local area at the time of the application. The housing needs survey for Winchcombe requires updating following the grant of permission for a recent rural exception scheme.• When examining primary services the capacity of services needs to be assessed. There also needs to be transport modelling based on different times of day and week – particularly evenings and Sundays – not just peak time travel. Winchcombe is currently very car-dependent.• Taxis drivers are a potential source of information regarding gaps in public transport provision.• Services attached to new developments could be designated at the planning policy stages but further consultation with communities and parish councils will still be required at the application stages.
Conclusion <p>Winchcombe PC leans towards Climate Change and Community spatial options – not Economic.</p>



Joint Core Strategy
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