

# Badgeworth Parish Council

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## **Strategic and Local Plan Cheltenham, Gloucester and Tewkesbury**

**February 14, 2024**

### **Response by Badgeworth Parish Council to the Issues and Options Consultation document issued in December 2023.**

#### **Preamble**

Badgeworth Parish Council has fully considered the SLP consultation document and welcomes the opportunity to respond.

We have not answered all the questions asked, but the content and responses made in the following paragraphs follow the same sequence as the consultation document.

In order to ensure our responses are meaningful and in context we have not used the on-line questionnaire but have prepared this written response.

There are a number of references to Shurdington service village. This is because the Shurdington settlement area is, uniquely, totally surrounded by the Green Belt and shares a significant part of its southern and western boundary with Badgeworth. The latter is predominately in the Green Belt and/or the AONB.

#### **The Strategic and Local Plan**

We appreciate that the SLP will cover the Cheltenham, Gloucester and Tewkesbury areas and, very appropriately on this occasion, will cover both the strategic and local plan policies in one document.

Looking forward to the preparation of future Plans, we would like to see one Plan covering the whole of Gloucestershire with the direct involvement of the Cotswold, Forest of Dean and Stroud District Councils. Issues such as public transport, roads, climate change, employment and housing need to be planned over the whole of the County.

The 'Duty to Co-operate' and the preparation of the 'Gloucestershire Statement of Common Ground' are clearly essential policies but, in our view, the direct involvement of all local authorities in the planning process is essential. The content of paragraph 2.4 of the consultation document would appear to confirm that this would be the most appropriate way forward.

### **Question 1 - How far into the future should the SLP cover?**

We would support a Plan covering 15 years. Issues such as climate change, strategic housing developments, some business development, transport infrastructure all require this period of time.

However, we would expect very rigorous reviews of the strategic aims at 5 yearly intervals. Local Plan developments of a non-strategic nature should be capable, in most cases, of being achieved in a 5-10 year period.

We perhaps need to bear in mind that other public sector organisations such as the County Council and Gloucestershire Hospitals have 5-year strategic plans. Many business organisations also tend to have 5-year plans.

## **Draft Vision and Strategic Objectives**

### **Question 4 - Draft Vision**

The draft Vision is short and to the point, but we feel that there needs to be a preamble which states that the aims and achievements of the Vision will be subject to national Government policies covering investment, financial constraints and changes in planning and other policies covering services such as housing, transport, climate change, health and education.

Although implied in the Vision statement, it may be appropriate to be more explicit on how all the accommodation issues surrounding an ageing population will be achieved over the next 5-15 years. We would suggest the need to mention the various types of accommodation and the need to strive to ensure independent living with easy access and support of local health and other services required by older people. Reference to the provision of more intergenerational homes on large development sites, in particular, should be made.

We would suggest the Vision avoids expressions such as 'beautiful', 'flourishing circular economy', 'thriving cultural offer will have flourished' etc.

### **Question 5 - Draft Strategic Objectives**

As it stands, the Strategic Objectives are fine, but we feel there should be a clear statement on how services, support and specialist accommodation will be achieved/planned for an ageing population. A reference to independent living/ sheltered accommodation, access to medical and health services and adult social care services should be referenced into the objectives. A reference to more intergenerational homes should be made.

## **Planning for Climate Change**

### **Question 6 - In what ways do you consider the SLP can most effectively address the impacts of climate change?**

Climate change is a significant technical and increasingly important subject.

We have purposely not answered Questions 6 to 11 but would like to suggest that the County Council and District Councils invest in a small central team of 'Climate Advisers' who can support the aims of the SLP by developing climate change policies, examine strategic and local development proposals covering housing and business etc. and develop planning conditions which require developers to play their part, through the planning process, in tackling climate change.

This is such an important and concerning subject that we feel that this sort of investment would be cost effective.

## Planning for Community and Business

### **Question 12 - Use of the Standard Method for calculating housing need.**

We do not consider exceptional circumstances exist which would justify using a method for calculating housing needs other than the Standard Method. There is always the danger of moving away from a nationally recommended formula to one which is designed locally and subject to possible scrutiny and criticism.

## Infrastructure

### **Question 23 - What types of infrastructure do you consider are most critical to be delivered alongside new developments?**

Public transport, active travel infrastructure, primary/nursery/play-school education, GP/Health Services, recreation/play areas and possibly food store.

### **Question 24 - Same question as No.23 but for Strategic Scale Developments**

Public transport, active travel infrastructure, primary/nursery/play-school education, secondary education, GP/health services, recreation, food stores/post office, accommodation/support services for older people, community centre, library services, youth service.

## Planning for Sustainable Development

### **Question 29 - Which of the development scenarios, or combination of them, do you consider the most appropriate for the SLP?**

We consider that *'Development Scenario 3 - Urban Extensions excluding the Green Belt'* should be adopted together with *'Development Scenario 4 (New Strategic Settlements)'*.

We feel that public consultation will, once again, indicate support for the retention of the Green Belt.

We have now reached the stage where the Green Belt (the smallest in England) is even more critical in avoiding the coalescence of Gloucester and Cheltenham. It is so important that these unique and historic towns do not merge through 'creeping' development. If, as we believe, the SLP consultation will confirm the retention of the Green Belt without further development encroachment into the countryside then there would seem little point in undertaking, as proposed, a further review of the Green Belt. Over recent years there have been 5 reviews of the Green Belt culminating in the last comprehensive review undertaken by AMEC for the Joint Core Strategy.

It is perhaps worth quoting from the Planning Inspector of the TBC Local Plan who stated, (when dealing with proposed sites in the Shurdington/Badgeworth areas) *'The undeveloped gap between Gloucester and Cheltenham lies astride the A46 between two urban areas. The extent of the Green Belt has already been reduced by the JCS through strategic allocations and land safeguarded for longer term development and any further reduction, even limited in nature, requires strong justification'*.

In our opinion, there is a need to adopt *Scenario 3 (combined with Scenario 4)* and avoid the extensive work required in examining and reviewing the potentially developable 15 sites/parcels of land listed in the Housing and Economic Land Availability Assessment for Tewkesbury Borough Council covering the Green Belt areas of Shurdington and Badgeworth.