

Gloucestershire  
Economic Growth  
Joint Committee

Gloucestershire  
Statement of Common Ground – February 2022

Cheltenham Borough Council  
Forest of Dean District Council  
Gloucester City Council  
Stroud District Council

Cotswold District Council  
GFirst LEP  
Gloucestershire County Council  
Tewkesbury Borough Council

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## 1. Introduction

- 1.1. This Gloucestershire Statement of Common Ground (GSoCG) has been prepared by the 7 local authorities in Gloucestershire (x1 County Council and x6 'District' Councils) and GFirst LEP – Gloucestershire's Local Enterprise Partnership – hereafter referred to as the parties.
- 1.2. "Gloucestershire has been a significant location for commerce since around AD48 when the Romans established an important crossing at the River Severn at Glevum. Located at a crossroads between Wales and London, and the West Midlands and the South West, the county's strategic position, even in an increasingly digital age, remains important to this day for businesses, visitors, and residents alike<sup>1</sup>". The county has a diverse and highly valued natural and built environment that makes it a particularly attractive place to live and work.
- 1.3. The County has a strong track record of working together at the strategic level, and has reached agreement on numerous subjects of common interest in recent times including Gloucestershire 2050, the Gloucestershire Local Housing Needs Assessment and the Gloucestershire Inward Investment programme. This GSoCG provides the opportunity to build upon the work that has gone before.
- 1.4. This is the first GSoCG and as such does not contain all the answers. The purpose of this statement is:
  - a. To identify and demonstrate where common ground exists between the parties
  - b. To identify and agree an action plan on the strategic spatial planning matters in Gloucestershire that require collaborative working between the parties.
  - c. To identify in principle the potential response to addressing the strategic spatial planning matters.
  - d. To provide the basis for a 'live' document to allow for regular updates which capture progress against responding to the strategic spatial planning matters, acknowledging that responding to the Climate emergency will be the "Golden thread" that runs through the strategic planning activities and the outputs of this GSoCG.
  - e. To meet (in part) the requirements placed on Local Planning Authorities from the National Planning Policy Framework Revised 2019 (the Framework) to discharge the statutory 'Duty-to-Cooperate' as part of their local plan preparation. The various statutory requirements for a statement of common ground are set out in Appendix 1 for ease of reference.

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<sup>1</sup> Source – Draft Gloucestershire Industrial Strategy 2019

- f. To respond to the Gloucestershire Economic Growth Joint Committee (GEGJC) to develop a statement of common ground as the basis to consider the development of a Gloucestershire Spatial Development Strategy.

1.5. Appendix 2 provides context and explanation to support the agreements outlined in this document.

## **2. Parties involved**

2.1. This GSoCG agrees strategic spatial planning matters between the following parties:

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- GFirst LEP
- Gloucester City Council
- Gloucestershire County Council
- Stroud District Council
- Tewkesbury Borough Council.

2.2. Any part of the GSoCG that is not agreed by the parties will be identified in Appendix 3, along with the organisation(s) not in agreement. Where text is not agreed by all parties it will be denoted with a dashed border.

2.3. In discharging their continuing joint and individual local plan responsibilities, some of the participating local authorities will need to agree additional or supplementary SoCGs or Duty-to-Cooperate statements with neighbouring local authorities both within and outside Gloucestershire, and with other bodies. Where appropriate, additional or supplementary agreements may be incorporated into the Gloucestershire GSoCG in future iterations, with appropriate explanation, or be presented as separate documents.

2.4. The GSoCG is a strategic document. It deals with matters that require cross-boundary consideration and agreement, and does not address non-strategic issues, which are the concern of and can be addressed by individual organisations, including through their local plans and the local transport plan.

## **3. Signatories**

3.1. The signatories to the GSoCG are the Leaders or Portfolio Holders of the seven local authorities, or the Chief Officers under delegated powers, and the Chair or Chief Executive of GFirst LEP as follows:

Signature and date

Leader or Chief Executive

Cheltenham Borough Council

Signature and date

Leader or Chief Executive

Cotswold District Council

Signature and date

Leader or Chief Executive

Forest of Dean District Council

Signature and date

Chair or Chief Executive

GFirst LEP

Signature and date

Chair or Chief Executive

Gloucester City Council

Signature and date

Leader or Chief Executive

Gloucestershire County Council

Signature and date

Leader or Chief Executive

Stroud District Council

Signature and date

Leader or Chief Executive

Tewkesbury Borough Council.

Other signatories

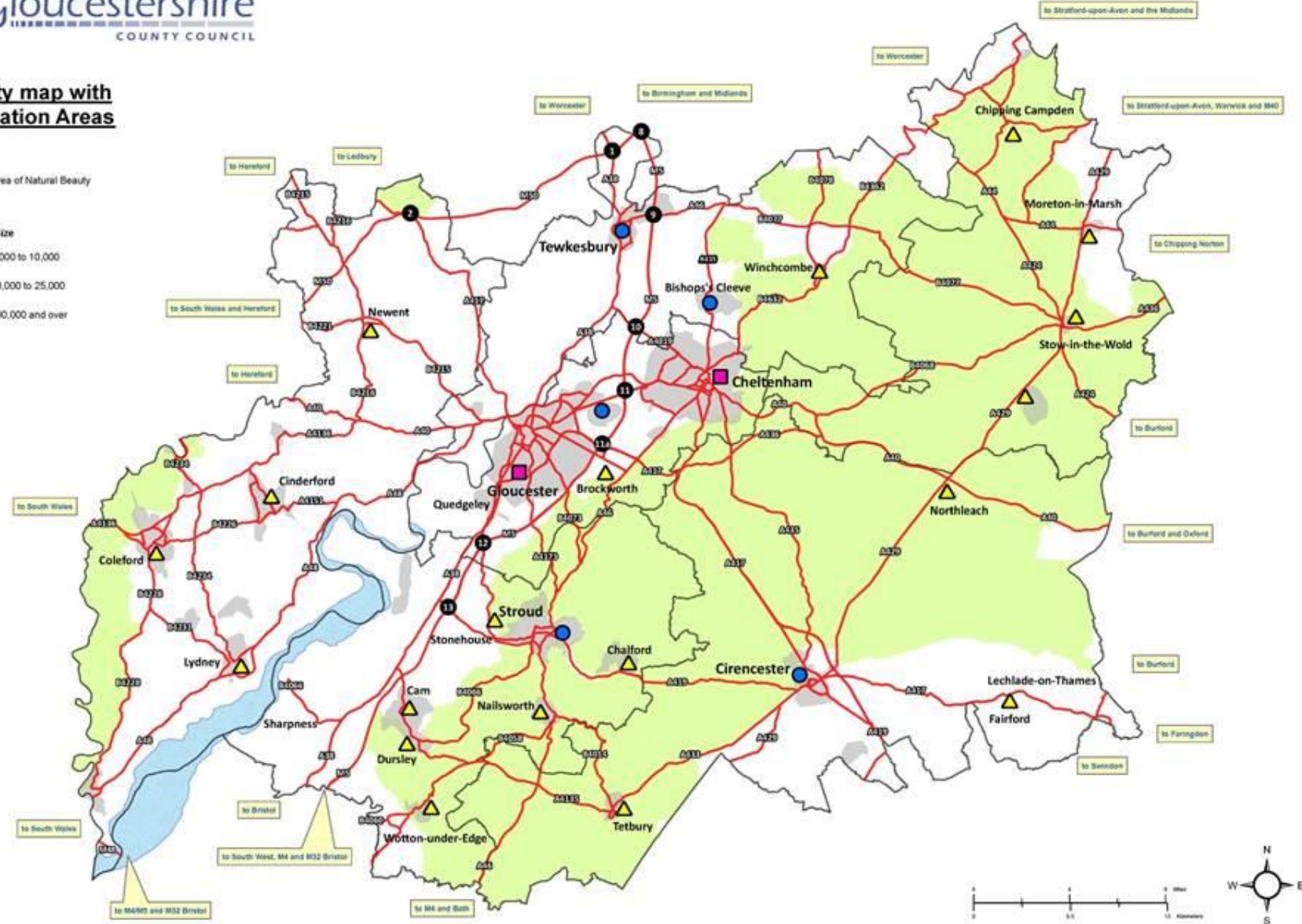
- 3.2. An appropriate representative of other strategic organisations will be required as a signatory if their organisation becomes a party to the GSoCG.

#### **4. Gloucestershire's Strategic Geography**

- 4.1. The GSoCG applies to the County of Gloucestershire. The rationale for developing a GSoCG for this area is the distinctiveness of the area and the relationship between the urban core of Gloucester and Cheltenham and the largely rural areas of Cotswold, Forest of Dean, Stroud and Tewkesbury and the functional and connectivity relationships that are presented. Gloucestershire as a whole is a Functional Housing and Economic Area with a sound economy, though with greater economic potential. This is recognised by the presence of GFirst LEP covering the same area. It also has a Police and Crime Commissioner and a Clinical Commissioning Group, alongside other strategic groups such as the Gloucestershire Nature Partnership and the Gloucestershire Health and Wellbeing Board.

**County map with  
Population Areas**

-  Area of Natural Beauty
- Population Size**
-  1,000 to 10,000
  -  10,000 to 25,000
  -  100,000 and over



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## 5. A Gloucestershire Spatial Development Strategy

### 5.1. The GEGJC have committed to:

“deliver a high-level spatial planning document for Gloucestershire which will set out agreed broad allocations for housing and economic growth across all districts”

and

“the development of, a high level future growth document for Gloucestershire, and work with the Local Plan teams to translate this into an agreed and adopted Gloucestershire Spatial Development Strategy”

5.2. In November 2018, the GEGJC endorsed a proposal to develop a “statement of common ground” as the most effective way of advancing these commitments in the first instance.

5.3. In addressing the matters agreed in this draft GSoCG, action will be taken and a body of evidence will be collected. Drawing that information together and understanding the relationship between the evidence gathered could readily then lead to the production of a Gloucestershire Spatial Development Strategy. The time, resource and financial requirements to support a Spatial Strategy need to be understood before commitment is given. When the aforementioned ‘Action Plan’ is presented to GEGJC, it will be accompanied by a business case for a Spatial Strategy for the County for consideration.

### Agreements

1. The parties agree to the development of a Gloucestershire Spatial Development Strategy and it is recognised that agreeing this statement of common ground provides the most effective way of advancing this commitment in the first instance.
2. The parties agree that an action plan to address the matters and agreements within the GSoCG should be produced. That action plan should build upon the emerging early work undertaken by Gloucestershire County Council and set out the matters to be addressed, the course of action proposed, responsibilities, timetables and budget requirements. That action plan will be presented for consideration by the parties in due course. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence.

## 6. Strategic Planning Matter Agreements

6.1. The following presents the agreements reached between the parties on strategic planning matters in Gloucestershire which require a joint response.

### Climate Change



## Agreements

3. The parties agree that the climate and ecological emergencies presents risks to the county that are systemic, and unprecedented in scale and potential impact.
4. The parties agree that responses to the climate and ecological emergencies must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.
5. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate and ecological emergencies and wherever possible deliver a positive contribution to climate change mitigation and adaptation and ecological recovery. Responding to the Climate Emergency will be the 'golden thread' that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.
6. The parties agree to investigate the use of alternative forms of energy generation, in line with environmental and landscape considerations.

## Housing

### Agreements

7. The Parties agree that making provision to meet the full range of housing needs in the right places at the right time is a vital role for the Gloucestershire authorities. The parties acknowledge this may result in one local authority accommodating the identified needs of another local authority, particularly where a local authority is unable to accommodate all of the identified need and where accommodating need in a neighbouring authority represents the most sustainable form of development.
8. The parties agree to jointly seek to meet in full (at least) the aggregated housing needs for Gloucestershire as identified by the statutory standard method at the time. The parties will continue the joint approach to the collection of housing needs data through a jointly procured and managed Local Housing Needs Assessment, using the relevant housing need methodology of the day. The parties agree to deliver housing where it promotes sustainable patterns of growth in Gloucestershire and is designed to respect local character and address potential impacts on existing communities.
9. The parties agree to explore the full range of development opportunities available, taking into account the potential impact on existing communities, resources and infrastructure.

## The Economy and Employment

### Agreements

10. The Parties agree it is important to take advantage of the location and characteristics of Gloucestershire and its economic strengths. The parties will take a pro-active role in creating the conditions within which existing and potential new employers can flourish, with a particular emphasis on spatial planning. Action will be taken to identify the appropriate scale and distribution of employment allocations, with the potential value of strategic sites to serve a larger area fully considered.
11. Parties agree that collaboration is essential to deliver a purposeful Gloucestershire approach to inward investment and business retention.

## **The Green Belt**

### **Agreements**

12. The Parties agree that the Green Belt in Gloucestershire is a strategic issue to be considered in the context of strategic spatial planning for the County.
13. The Parties agree that changes to the Green Belt boundary will be considered through the local plan making process, particularly through the JCS Review, in order to provide more sustainable locations for development that support the overall spatial strategy.

## **Transport Provision**

### **Agreements**

14. The Parties agree that strategic land allocations will set out the appropriate transport infrastructure required to deliver sustainable, resilient communities. This will be achieved through implementing the policies of the Gloucestershire Local Transport Plan, which provides for better public transport, cycle and pedestrian infrastructure, and active travel to enable a more efficient, low-carbon and people-centred transport network that delivers genuine travel choice and contributes to the growth of Gloucestershire's economy. Each strategic allocation that comes forward through the development plan will be supported by a sustainable transport mitigation package, based on the policies set out in the Gloucestershire Local Transport Plan.
15. The Parties agree to continue the exploration and pursuit of the opportunities to enhance the passenger transport network and services, as an integral part of developing a potential integrated spatial strategy and with the objective of increasing the proportion of trips within and beyond Gloucestershire made by rail.
16. The Parties agree that local plans should contain policies to ensure new developments support, where possible, the viability of passenger transport network and services. This is in recognition of the role of passenger transport in improving all people's accessibility and to reducing the carbon emissions associated with transport.
17. All parties agree that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

18. The Parties agree that local plans should contain policies requiring developments to contribute the provision of the walking and cycling network. This is in recognition of the role active travel will play in achieving carbon reducing ambitions and promoting a healthy and active society. The aspiration is for cycling to become mass transit and routes must be designed for larger numbers of cyclists, of all abilities and disabilities. Cycling and walking should be at the heart of transport, place-making, and health policy.

## Digital Network

### Agreements

19. The Parties will seek every opportunity to promote the advancement and rollout of digital infrastructure. The goal will be to achieve high quality digital services and modern economic and social infrastructure for Gloucestershire so that the County can continue to compete regionally, nationally and globally in the attraction of people and businesses. There will be a particular focus on delivering cyber technologies and digital infrastructure across the entire County, noting that substantial parts of Gloucestershire are rural areas.
20. The Parties will work with industry to identify the best means of contributing through planning policy and highways work to the timely delivery of comprehensive, open access, digital infrastructure.

## Natural Environment and Green Infrastructure

### Agreements

21. The Parties will ensure that strategically and locally important green infrastructure and ecosystem services are valued and improved through the development of a Natural Capital approach and the Nature Recovery Network, both being led by the Gloucestershire Local Nature Partnership (GLNP).
22. The Parties agree that local plans should contain policies requiring developments to deliver high quality and appropriately managed green infrastructure, to comply with and, where feasible, be assessed against the Building with Nature Standards, and to deliver a net gain for biodiversity.
23. In developing the Natural Capital approach, consideration will continue to be given to the desirability and feasibility of creating a regional park, possibly around the River Severn and its washlands, with objectives including raising awareness of the natural environment, habitat enhancement, recreation, strategic water management, carbon capture, and the creation of a Gloucestershire brand.
24. The Parties agree to work collaboratively to help conserve, manage and enhance the area's unique natural environment including areas of international and national landscape and biodiversity importance.

25. The Parties agree to work collaboratively and holistically to develop a Gloucestershire wide approach to mitigate against flood risk and to build in resilience through nature-based solutions. The role played by green infrastructure in reducing the risk of flooding should be considered at every scale stage in determining sustainable strategic land allocations for housing and employment. Parties agree to ensure adequate consideration is given to the cumulative and off-site impacts of development on future flood risk. The promotion of new water retention technologies will be encouraged, including sponge technology techniques.

## Health and Social Infrastructure

### Agreements

26. Parties will ensure that provision for strategic health, wellbeing, cultural and education facilities, consistent with the changing size and structure of the population, is made in the appropriate locations through spatial strategy. This will include the raising of standards and inclusive access across these facilities.
27. The Parties are committed to the elimination of discrimination and promotion of equality of opportunity for all citizens and will work towards this goal, both in the provision of services and employment.

## Infrastructure Delivery

### Agreements

28. The Parties agree that the strategic infrastructure needs\* for the County, particularly those that align to future strategic growth, will be identified, prioritised and agreed on, and captured in one single source document. A methodology for prioritisation will be agreed in advance of the prioritisation taking place.
29. The infrastructure agreed upon will be costed and scheduled. The likely funding streams and mechanisms to enable the delivery of infrastructure will be identified. Joint working and engagement across parties will be used to develop business cases for funding and competitive bidding.
30. The Parties agree, through appropriate governance arrangements, that the task identified at agreements 22 and 23 should be undertaken strategically with involvement of the parties and others where relevant.

*\* Strategic Infrastructure Needs - refers to a broad range of infrastructure required to support future growth, included but not limited to social, cultural, educational, green infrastructure as well as more 'traditional' infrastructure associated with new development (e.g. roading infrastructure).*

## Minerals and Waste

## Agreements

31. The Parties agree to identify valuable minerals resources to be safeguarded for possible exploitation, and agree to seek the best way forward and its implementation through local plans, including by the exploitation of minerals in association with development in accordance with the spatial strategy.

32. The Parties will support the form and location of appropriate waste management facilities to positively support a progressive approach to waste management and press on with the move towards a circular economy. The Parties will actively discourage waste management facilities that do not contribute to the development of the circular economy.

33. The Parties will continue and extend the work started in parts of the Gloucestershire the identification of opportunities for the generation of energy from renewable and benign resources and will seek positive and progressive policies in local plans for the exploitation of these opportunities.

34. The Parties will seek to produce a reduction in the level of energy use, and this will be sought in part by the requirement for the incorporation of the most appropriate advanced technologies for energy generation from renewable sources and for energy conservation as part of significant new development schemes.

## 7. Governance

7.1. In order for this GSoCG to be advanced and the agreements identified above delivered, clear governance is required. The GEGJC is an established committee, and is the committee that jointly commissioned this GSoCG. The following governance arrangements are proposed:

- The GEGJC will continue to be the committee responsible for the overall production, development and monitoring of the GSoCG.
- The Senior Responsible Officer for the GSoCG will be XXX. They are charged with XXX
- The Strategic Planning Leaders Board will continue to provide strategic oversight and management of the GSoCG, the GSoCG Action Plan and any other future initiatives arising from the GSoCG.
- The Heads of Planning/Planning Policy Managers in district authorities, the Outcome Manager from GCC and the Deputy CEO from GFirst LEP will take responsibility for the production and updating of any further initiatives arising from the GSoCG

## Agreements

35. The parties agree that the Gloucestershire Economic Growth Joint Committee will be the committee responsible for the production and monitoring of the GSoCG.

36. The parties agree that whilst the essential purpose of the GSoCG is to promote joint action in addressing strategic issues, nothing in the GSoCG removes the roles and responsibilities of the individual participating organisations in making decisions according to their statutory roles.

## **8. Next Steps**

- 8.1. Reaching agreement on strategic planning matters is the start of the GSoCG. Action needs to be taken to address the matters arising from those agreements. It is proposed that an action plan be developed to identify the actions to be taken, those responsible for taking that action, and a timeframe and budget to address the actions. This will be presented to GEGJC within 6 months of this GSoCG being approved by GEGJC. (See Appendix 4 for template)
- 8.2. The actions will address some of the evidence needs arising from Local Plan preparation across the 7 authorities. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence..
- 8.3. The GSoCG is a live document and needs to be kept up-to-date. This should be done annually and/or when progress is made to address the matters or agreement and/or when the landscape changes (for example planning reform or local government reorganisation). Progress also needs to be monitored, which again should be done annually and reported through a monitoring report.

## **Agreements**

37. The parties agree that the GSoCG is a live document, to be updated and monitored regularly, and as a minimum on an annual basis.

## **Appendices**

1. The Requirements of a Statement of Common Ground
2. Background Information to Support the Gloucestershire Statement of Common Ground
3. List of 'Agreements' not agreed by any and/or all parties
4. Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground

## **Appendix 1 - The Requirements of a Statement of Common Ground**

MHCLG – Guidance on Plan Making (<https://www.gov.uk/guidance/plan-making>)

### **What is a statement of common ground expected to contain?**

A Statement of Common Ground is expected to contain the following:

- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
- b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;
- c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
- d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
- e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
- f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.



## **Appendix 2 - Background Information to Support the Gloucestershire Statement of Common Ground**

### **1. Gloucestershire's Strategic Geography**

- 1.1. Gloucestershire lies between other complementary and competing areas, with Bristol and the West of England Combined Area to the south, Oxfordshire to the east; Swindon to the South East; Birmingham, Coventry and Warwickshire to the north; and Worcestershire and Wales to the west and north-west. Gloucestershire is part of the Western Gateway launched in November 2019, as a strategic partnership intended to promote and maximise economic growth across the west of England and south Wales. The Western Gateway will seek to ensure that the region is globally competitive and as such is intended to mirror and compete with the already established Northern Powerhouse and Midlands Engine. Gloucestershire is actively involved in the progression of the Western Gateway and Gloucestershire has a significant role to play, in particular through the progression of cyber as a key sector and lever for growth in this part of the region. As well as cyber-tech the draft Local Industrial Strategy highlights agri-tech, aerospace and manufacturing services sectors as key strengths for the county.
- 1.2. There are a number of strategies dealing with social, economic and environmental issues for Gloucestershire and others in preparation. These are examples of collective working on strategic issues, and participants in the GSoCG are either party to these strategies or will continue to seek to work with the owners of these strategies and to cooperate in their implementation. Current and emerging strategies include Gloucestershire 2050, the Local Industrial Strategy, the Local Transport Plan, the Sustainable Energy Strategy, the Green Infrastructure Strategy and the emerging climate change strategy for Gloucestershire. What is clearly evident from this strategic context is the alignment of priorities that that will need to be considered in developing the GSoCG.
- 1.3. Currently, Local Plans and the Local Transport Plan are the primary, statutory mechanism used to plan and deliver development in Gloucestershire. These plans, when considered holistically, provide a 'spatial plan' for Gloucestershire up to the mid 2030's, broadly as follows:
  - The Urban Areas of Cheltenham and Gloucester, adjacent areas within Tewkesbury Borough, as well as Ashchurch are the focus of strategic growth
  - Stroud caters for significant growth, commensurate with its size and geographical location
  - Tewkesbury and Winchcombe together with the larger villages of Tewkesbury Borough, the Forest of Dean towns of Coleford, Lydney, Newent and Cinderford, and the larger Cotswold towns of Cirencester, Moreton-in-Marsh and Tetbury cater for reasonable levels of development, commensurate with their size.
  - Smaller urban areas (including villages) across Gloucestershire provide for local need
  - Rural areas are largely protected from development
  - Investment in transport infrastructure largely aims to cater for growth at the levels identified above and remedy other existing, identified problems.

Spatial planning in Gloucestershire has been approached in this hierarchical way for some considerable time. With the important additional consideration of potential new settlements, such a development approach means that homes are built close to the largest areas of employment opportunities, infrastructure investment can be target toward major populations (enhancing its use, effectiveness and success) whilst other areas can accommodate local demand whilst protecting character, both built and natural. The current status of Local Plans across Gloucestershire is set out at Appendix 2.

## **2. Current Context (September 2020)**

2.1. There are a number of recent events that will inevitably impact on spatial planning in Gloucestershire (and indeed the broader country). They are outlined below because they will have a significant bearing on the way in which this GSoCG and any Gloucestershire wide spatial planning is taken forward. These include:

- All local authority parties have declared a Climate Change emergency (with some also declaring a specific ecological emergency) with varying aims and targets within the last 12-18 months, all with a theme of reducing carbon emissions. If this is to be achieved the location and connectedness of, and the design standards adopted in new development need careful consideration and a joined up approach.
- Covid 19 and it's impacts – It is inevitable that there will be negative short-medium term economic consequences. There may well be lasting societal changes that emerge too – including a reduced demand for travel, a greater appreciation and utilisation of people's homes and local areas (in particular open, green spaces), an accelerated need to change the function of urban centres, a need for enhanced digital connectivity and so on, a decentralisation from larger urban centres such as London and Birmingham as remote technology and ability to work from homes shifts perceptions in where people wish their homes to be located.
- The Government's Planning White Paper of Summer 2020 proposes wholesale reform of the planning system in England. There are a wide range of changes proposed which if implemented will have a significant impact on Plan making and infrastructure delivery across England.
- The Government may consult on further devolution proposals during 2021. The opportunity to plan jointly (for example the JCS) already exists, but changes to local government structures in the future may provide new opportunities.

2.2. Taken as a whole, these recent events, the outcomes of which are unknown, will have a profound effect on plan making and delivery of growth in the future. This must be borne in mind in progressing with this GSoCG and any recommendations arising. A live 'GSoCG' should enable timely responses to the challenges we face. At the same time, investment in strategic planning, including future work on this GSoCG and any subsequent planning strategy work, needs to be carefully considered in the context of planning reform and local government review.

### **3. Strategic Planning Matters in Gloucestershire**

#### **Introduction**

- 3.1. The GSoCG is about strategic planning matters that can be addressed by spatial planning and need to be addressed by more than one district planning authority, whilst working with the County Council and GFirst LEP. What follows is an identification of the strategic matters in Gloucestershire, with a set of agreements which capture the matters arising and the proposed responses (as actions). They are presented as distinct matters of spatial planning but need to be considered as component parts of successful spatial planning.

#### **Climate Change (and Ecological Emergency)**

- 3.2. There is an overwhelming need in Gloucestershire, as everywhere, to address the climate and ecological emergency, as declared by each of the local authorities in Gloucestershire. The strategic planning activities in the Gloucestershire must work towards this commitment and to achieving a net carbon zero society. There are opportunities through growth to advance carbon reduction technologies in Gloucestershire, including through commitments to sustainable construction and better building energy performance. The level of use of energy by residents, workers and visitors is higher in Gloucestershire, as everywhere, than is consistent with a low carbon future. More needs to be done to generate energy locally from renewable sources using a variety of technologies and to reduce the consumption of energy generally.
- 3.3. Gloucestershire's existing transport network depends largely on its highway network. Future transportation solutions in Gloucestershire need to balance demand for clean sustainable growth and improved connectivity with maximising the efficiency of existing infrastructure. Significant investment in Gloucestershire's passenger and active travel networks will be required to complement planned highway capacity works as future growth will require greater integration of modes to ensure a high quality transport network is deliverable.
- 3.4. The legacy of COVID-19 and the possible changes towards travel demand is likely to challenge the traditional view of managing the transport network, with the priority of minimising journey times switching to managing journey options for people as transport networks decarbonise. Serving a growing leisure market may also become as important as commuting options when people decide where to live and this may need to be considered as the county grows.

#### **Housing**

- 3.5. The housing needs of Gloucestershire have to be met to enable the members of the changing population to house themselves, including those who need assistance through the provision of affordable housing, to address the need to attract a younger working age population and to ensure a workforce exists locally to enable the achievable growth in the economy to take place. The housing that is built needs to be fit for purpose and enable people to live

independently in their own home for as long as they can. This will require a flexible response to the type and tenure of housing together with the sustainability principles of the product.

- 3.6. Each local authority is required to make provision to meet the housing needs of its area through Local Plans. How and where that provision is made clearly affects those in need of housing, and has implications for the economy, transport and the environment. It is important that the right type of housing is development in the right places to meet needs, enhance wellbeing, support the economy and protect the environment. The future form of housing development in Gloucestershire, whether this be through extensions to existing settlements or through new settlements, should promote sustainable patterns of living and be designed to respect local character.
- 3.7. The housing requirements are increasingly unlikely to be met wholly within the same local administrative area as the need arises, particularly where those areas are geographically/administratively constrained (e.g. Cheltenham and Gloucester). Where this arises, planning policy requires those authorities to seek provision in neighbouring authority areas, and if this cannot be achieved reach a conclusion that the need cannot be met. Failing to meet housing need impacts on Gloucestershire’s growth ambitions, housing affordability and choice, reduces the available workforce in an area and encourages travel between people’s homes and jobs particularly (in Gloucestershire case) by private car and can make the provision of services less efficient to deliver.
- 3.8. Current local plans/local plans in development in Gloucestershire make provision for new homes to varying timescales. This provisions is captured below:

| <b>Area</b>           | <b>Plan Status and key dates</b>  | <b>Plan Period</b> | <b>Requirement</b>        | <b>How is this Met?</b>   |
|-----------------------|---|--------------------|---------------------------|---|
| <b>Cheltenham</b>     | Joint Core Strategy adopted 2017<br><br>Cheltenham Plan adopted 2020                                    | 2011-2031          | at least 10,917 new homes | Completions, commitments, Plan allocations and windfall allowance |
| <b>Cotswold</b>       | Adopted 2018  | 2011-2031          | 420 pa                    | Allocation and windfall supply                                    |
| <b>Forest of Dean</b> | Allocations Plan adopted June 2018<br>Replacement Local Plan at early strategic options stage (2021-41) | 2006-2026          | 330 pa                    | Allocation and windfall   |
| <b>Gloucester</b>     | Adopted Joint Core Strategy   | 2011-2031          | at least 14,359 new homes | Completions, commitments,   |

|                   |  |           |                           |  |
|-------------------|--|-----------|---------------------------|--|
|                   | Emerging Gloucester City Plan (at Examination)                                       |           |                           | Plan allocations and windfall allowance  |
| <b>Stroud</b>     | Local Plan adopted November 2015   | 2006-2031 | At least 11,400 new homes | Completions, commitments, Plan allocations and windfall allowance  |
| <b>Tewkesbury</b> | Adopted Joint Core Strategy<br><br>Emerging Tewkesbury Borough Plan (at Examination) | 2011-2031 | 9,900                     | Completions, commitments and proposed allocations in emerging Borough Plan total 9,397 dwellings<br><br>Shortfall (503 dwellings) to be addressed through JCS review |

3.9. Local Plans in the area also contain specific policies for Gypsy and Traveller provision, as below:

| <b>Area</b>           | <b>Plan Status and key dates</b>                                     | <b>Plan Period</b> | <b>Requirement</b>                               | <b>How is this Met?</b>  |
|-----------------------|--|--------------------|--|--|
| <b>Cheltenham</b>     | Joint Core Strategy adopted 2017<br><br>Cheltenham Plan adopted 2020 | 2011-2031          | 3 pitches  | Criteria based policy  |
| <b>Cotswold</b>       | Adopted Local Plan (2018)  | 2011-2031          | 3 pitches  | 2 allocated sites + criteria based policy for additional allocations |
| <b>Forest of Dean</b> | Allocations Plan 2018/ Core Strategy 2012                            | 2006-2026          | No requirement identified at time of examination | Criteria based policy  |

|                   |  |           |                         |   |
|-------------------|--|-----------|-------------------------|---|
| <b>Gloucester</b> | Adopted Joint Core Strategy<br><br>Emerging Gloucester City Plan (at Examination)    | 2011-2031 | 2 pitches               |   |
| <b>Stroud</b>     | Local Plan adopted November 2015   | 2006-2031 | 31 pitches              | Completions and commitments   |
| <b>Tewkesbury</b> | Adopted Joint Core Strategy<br><br>Emerging Tewkesbury Borough Plan (at Examination) | 2011-2031 | 17 pitches <sup>2</sup> | Completions and proposed Borough Plan allocations total: 50 pitches |

3.10. Local Plans in the area also contain specific policies for Travelling Showpeople provision, as below:

| <b>Area</b>           | <b>Plan Status and key dates</b>  | <b>Plan Period</b> | <b>Need</b> | <b>How is this Met?</b> |
|-----------------------|---|--------------------|-------------|-------------------------|
| <b>Cheltenham</b>     | Joint Core Strategy adopted 2017<br><br>Cheltenham Plan adopted 2020              | 2011-2031          | None        | N/A                     |
| <b>Cotswold</b>       | Adopted Local Plan (2018)   | 2011-2031          | None        | Criteria based policy   |
| <b>Forest of Dean</b> | Allocations Plan 2018/ Core Strategy 2012   | 2006-2026          |             | Criteria based policy   |
| <b>Gloucester</b>     | Adopted Joint Core Strategy<br><br>Emerging Gloucester City Plan (at Examination) | 2011-2031          | 16 plots    |                         |

<sup>2</sup> 17 pitches includes 5 pitches from those who meet the definition of traveler from the Planning Policy for Traveller Sites plus 25% (12 pitches) of those where it was at the time unknown whether they would meet the definition or not.

|                   |  |           |          |  |
|-------------------|--|-----------|----------|--|
| <b>Stroud</b>     | Local Plan adopted November 2015   | 2006-2031 | 8 plots  | Completions and commitments                      |
| <b>Tewkesbury</b> | Adopted Joint Core Strategy<br><br>Emerging Tewkesbury Borough Plan (at Examination) | 2011-2031 | 22 plots | Proposed Borough Plan allocations total: 9 plots |

3.11. There are good reasons for the parties to agree that housing provision is a strategic spatial planning issue, and that joint working to make sufficient provision is essential. Work is already underway to address this issue jointly. District authorities in Gloucestershire are currently working on a Local Housing Needs Assessment which identifies the minimum housing need for Gloucestershire broken down to a District level and sub categories of need, including affordable housing and housing for special needs.

3.12. Proposed reforms to the current planning system will change the methodology used to calculate housing need. The initial indication is that the 20yr need will rise from 65,000 under the current method to 95,000 under the new method. To meet these identified needs a range of development options will need to be considered and joint working will be essential.

#### **The Economy and Employment**

3.13. Whilst the economy of Gloucestershire is strong, there is greater economic potential to be achieved, with some sectors showing particular strength and with Gloucestershire home to some distinctive businesses activities that can be nurtured to the benefit of the local and wider economy. All prospective employers will in part be assisted through the provision of employment land and space where it is needed and of a scale and type suitable for the requirements of the relevant sectors, with particular regard to where Gloucestershire may have a particular advantage over other possibly competing areas. Flexibility will be key and this will need to be built through engagement across the key sectors. GFirst LEP will be a key contributor to providing the evidence base to help steer the changing economic context for Gloucestershire.

3.14. Gloucestershire has an ageing population with a falling level of economically active people, a change taking place because the retention of young people in the area is relatively low. This will give rise to increasing inter-generational tensions and has direct and indirect negative effects on the economy.

3.15. In Gloucestershire critical roles in creating the conditions for businesses to thrive include:

- The district councils, charged with providing for employment space through the allocation of land in local plans, and with ensuring enough housing is provided

- The County Council responsible for transport infrastructure, economic development and education
- GFirst LEP with very strong links with businesses and providing direct support to new, incoming and existing businesses, as well as producing the Local Industrial Strategy
- All local authorities with various responsibilities for green and inclusive growth

3.16. Whilst these organisations work together, there isn't yet one coherent strategy for coordinated action to support the development of employment and the economy in the future. GFirst LEP have prepared the Local Industrial Strategy for Gloucestershire which was put to Government prior to the onset of Covid-19. The views of the Government are awaited. Local Plans provide for employment land across Gloucestershire, currently as follows:

| <b>Area</b>           | <b>Plan Status and key dates</b>  | <b>Plan Period</b> | <b>Requirement</b>                  | <b>How is this Met?</b>  |
|-----------------------|---|--------------------|-------------------------------------|--|
| <b>Cheltenham</b>     | Joint Core Strategy adopted 2017<br><br>Cheltenham Plan adopted 2020              | 2011-2031          | 192ha B Class – across the JCS area | Completions, commitments, Plan allocations and windfall allowance                      |
| <b>Cotswold</b>       | Adopted Local Plan (2018)   | 2011-2031          | 24ha B Class land between 2016-2031 | Completions, commitments and plan allocations  |
| <b>Forest of Dean</b> | Allocations Plan 2018   | 2006-2026          | Not stated                          | New allocations and intensification of existing sites, criteria based policies (60+ha) |
| <b>Gloucester</b>     | Adopted Joint Core Strategy<br><br>Emerging Gloucester City Plan (at Examination) | 2011-2031          | 192ha B Class – across the JCS area | Completions, commitments, Plan allocations and windfall allowance                      |
| <b>Stroud</b>         | Local Plan adopted November 2015  | 2006-2031          | 58 hectares                         | Completions, commitments, Plan allocations and windfall allowance                      |



|                   |  |           |                                     |   |
|-------------------|--|-----------|-------------------------------------|---|
| <b>Tewkesbury</b> | Adopted Joint Core Strategy<br><br>Emerging Tewkesbury Borough Plan (at Examination) | 2011-2031 | 192ha B Class – across the JCS area | 84ha on strategic allocations (some or all within Tewkesbury Borough)<br><br>40ha on proposed allocations in the emerging Tewkesbury Borough Plan<br><br>Other commitments and vacant employment land across the Borough. |
|-------------------|--|-----------|-------------------------------------|---|

3.17. The parties have recently completed a new Gloucestershire Economic Needs Assessment (2020) which:

- Identifies the Functional Economic Market Area (FEMA) for planning purposes.
- Provides a review of the context in neighbouring areas and the wider region.
- Provides an assessment of the economic performance and characteristics and commercial property market.
- Considers a range of scenarios for future economic growth in Gloucestershire.
- Identifies the quantum of employment land required to meet these scenarios and the locational requirements of different sectors.

This work has been commissioned to directly inform the preparation of Local Plans across Gloucestershire.

### **The Green Belt**

3.18. Parts of Gloucestershire are designated as Green Belt, a designation dating from the Gloucestershire Development Plan of 1968 and extended by the Gloucestershire County Structure Plan in 1981. The fundamental intention the Green Belt is to prevent urban sprawl by keeping land permanently 'open'. Parts of Gloucestershire that offer good potential for promoting more sustainable development are in the green belt and so local plans – prepared with the overriding statutory objective on plan-makers of promoting sustainable development

- will have to consider whether changes to the area of green belt will have to be made, as national planning policy provides for.

- 3.19. Green Belt policy was originally conceived as a strategic policy for shaping the pattern of development – and it was identified through strategic planning documents when designated. It should be looked at strategically therefore, and this is a role for the GSoCG. If avoiding development in the Green Belt means that the development will have to go elsewhere, then the alternative locations must still need to contribute toward the overall spatial strategy and sustainable development objectives. For plans to withstand scrutiny the reasons for rejecting alternatives must be clearly given.

### **The Movement of People, Goods, Services and Information**

- 3.20. There is a clear need to provide for greater modal choice to provide for alternatives to the car and enable individuals to choose how they travel. Post COVID-19 there will be a need to work collectively to develop a financially sustainable transport offer that reflects the possible legacy of the pandemic on changes in demand to traditional journey patterns. Improvements in digital connectivity open opportunities for this and help support the management of the transport network.
- 3.21. As the county grows there is a clear need to increase the market share of rail through better regional connectivity and work with bus operators to identify sustainable solutions to develop a financially sustainable, socially inclusive and efficient countywide bus network. This will provide for areas not served by rail. It will also aid understanding of the decarbonisation transfer process the roles different parties will need to play supporting this. Cycling and Waling also provide a real opportunity to improve the physical and mental health of residents, improve air quality and ease congestion within urban areas.
- 3.22. In addition to supporting personal travel it is important to recognise the requirements of commercial operators to provide the most efficient way of transporting goods alongside reducing carbon emissions and improving air quality.
- 3.23. The movement of people, goods and services between and within places and spaces has a profound effect on the economy, the lives of residents and the environment. There is a clear relationship between the location, scale and form of growth and movement. This GSoCG provides the opportunity to maximise the opportunity to promote and enable shifts in movement behaviour through considering the location of existing and new populations and aligning movement solutions to enable the greatest impact and success.

### **Transport Provision**

- 3.24. Essential travel in Gloucestershire is heavily based on the private car. For the most part this is currently fossil fuel propulsion, but this will change dramatically in the plan making periods relevant to the GSoCG, as car technology is changing quickly, with electric and other forms of non-carbon emitting propulsion taking over, with manufacturers committing to phasing out fossil fuelled propulsion. The provision of publicly accessible electric charging is an important

commitment by the County Council and district authorities which will facilitate and speed this change to the car as a sustainable mode of transport. However, even with the uptake of electric vehicles proceeding as planned, Government and local carbon reduction targets can only be achieved if we also create communities that reduce the need to travel and through a significant shift to sustainable transport modes, such as walking, cycling and public transport. The GSoCG will need to take account of this fundamental change in outlook in considering sustainable locations for strategic land allocations for the future.

- 3.25. The housing and employment land strategic site selection purpose of the GSoCG provides a golden opportunity to enable much improved public transport connections for residents, both road and rail, to create the genuine choice for residents outlined in paragraph 3.21, and deliver the public transport aspirations of the Local Transport Plan.
- 3.26. Covid-19 has led to a significant increase in online retail and remote working. Clearly this has negative consequences on existing town centres, but the need to travel for retail purposes are diminishing. New technologies and initiatives are ever developing which may lead to a shift the way in which people, goods and services move, ranging from Electronic Vehicles and Autonomous Vehicles to Mobility as a Service (MaaS). The location, design and layout of new development need to take into account of these developments. Digital technology provides an alternative to movement, and this is covered in more detail below.
- 3.27. The Gloucestershire Local Transport Plan (LTP) sets out the current transport strategy for Gloucestershire to 2041. The plan provides for a range transport schemes which largely aim to cater for planned growth and seeks to promote modal shift in new developments.
- 3.28. Development beyond that identified in existing advanced or adopted local plans provides the greatest opportunity to influence future movement choices. The road and rail network, together with technological advances provides the opportunity for modal shift but investment will be required. The LTP sets out a range of aspirations and scenarios for catering for growth that could take place beyond 2031. These aspirations and scenarios need to be developed alongside decisions on the future locations of growth to make them effective and successful.

### **Digital Network**

- 3.29. Gloucestershire already has a strategic role in cyber security and this will grow significantly with the development of 'Cyber Central'. The County must position itself to take full advantage of this opportunity, from education to supporting industries to broader connectivity benefits for the community at large.
- 3.30. The movement of information digitally is becoming ever more relevant, and Covid-19 has proved the value of and need for quality connectivity, particularly for the service sector on which a large proportion of the Gloucestershire economy relies. Quality broadband services are increasingly a factor people consider when looking at the attractiveness of an area as somewhere to live. Gloucestershire has the opportunity to benefit from the comprehensive and inclusive roll out of high quality digital infrastructure to assist business and domestic users.

## **Natural Environment and Green and Blue Infrastructure**

- 3.31. Gloucestershire contains areas of great landscape value, some recognised by national designations and of huge value to residents and visitors alike, and these need to be conserved and enhanced for their own sake and for the distinctive character they give to Gloucestershire. At the same time, more people need ready access to environmental assets as has been highlighted during the Covid-19 pandemic, and there is 'quality in the ordinary'. An enhanced green infrastructure network of spaces and corridors would provide structure and identity to an area, benefit wildlife, create recreational opportunities and amenity, help in the management of water, and assist in carbon capture.
- 3.32. Green infrastructure as a connected network of multi-functional green and blue spaces and corridors is essential to the wellbeing of Gloucestershire and its people, and is something should be part of the spatial strategy and as such promoted through the GSoCG. Part of the appeal of Gloucestershire for residents and business alike is its natural environment.
- 3.33. There is a great deal of work underway in Gloucestershire by government agencies, local authorities and voluntary groups promoting various aspects of green infrastructure. This includes:
- The work promoted by the Gloucestershire Local Nature Partnership (GLNP) on natural capital baseline mapping and on the Nature Recovery Network that helps to underpin it.
  - The national Building with Nature Standards, developed in Gloucestershire (initiated by the GLNP and the Gloucestershire Wildlife Trust), provide planners and developers with evidence-based, how-to guidance on delivering high-quality green infrastructure
  - The emerging Environment Bill will mandate Biodiversity net gain for certain types of development, noting the National Planning Policy Framework (NPPF) already highlights the need to provide biodiversity net gain.
- 3.34. In 2015, the Green Infrastructure Working Group of the GLNP developed 'A Strategic Framework for Green Infrastructure in Gloucestershire' with consultation and agreement gained from Gloucestershire's local authorities (undergoing review in 2020-21).
- 3.35. Gloucestershire Vision 2050 identified the potential of a Regional Park. Stakeholders have been investigating the possibility, including identifying a possible location.
- 3.36. Furthermore, all authorities signed up to the GLNP Green Infrastructure Pledge in 2018 - a promise to commit to making Gloucestershire a pioneer of green infrastructure, creating a better, more attractive place to live, work and visit, as well as becoming an exemplar for the rest of the country.
- 3.37. Many of the local authorities in Gloucestershire have recognised the huge declines in biodiversity by declaring climate and ecological emergencies. Many policies and initiatives are

in place or are being developed around biodiversity and nature recovery showing a commitment to continuing to work in partnership to address biodiversity declines.

- 3.38. There is therefore a great deal to use and to build upon for improved and better valued green infrastructure, expressed through strategy/policy, as part of the spatial strategy embraced by the GSoCG.
- 3.39. Flood resilience will require a strategic response, including others beyond the boundary of Gloucestershire. Having a clear and agreed proposed flood resilience response will enable the Parties to engage with neighbouring authorities and regions in a coordinated way.

### **Energy Production**

- 3.40. There is a need to increase energy efficiency and reduce energy usage for residents, workers and visitors in Gloucestershire in order to achieve a net-zero carbon future. There are key opportunities to achieve this through commitments to more sustainable construction methods with improved building energy performance, as well as through shifts in transport modes. There is also opportunity to explore renewable and low-carbon energy generation projects, including community energy schemes.
- 3.41. The Gloucestershire Sustainable Energy Strategy (2019) includes 6 key ambitions for energy reduction in Gloucestershire and a road map of actions to establish the building blocks necessary, focusing on the next 6 years.

### **Health and Social Infrastructure**

- 3.42. Many of the matters above have a clear impact on health and wellbeing – to provision of quality green space and housing, providing opportunities for active travel, reducing emissions and improving air quality and so on. The relationship between spatial planning is not traditionally fully understood, but that relationship is becoming clearer.
- 3.43. Specifically here, early year, educational, health and cultural facilities including open space, need to be provided at least in balance with the needs of a growing and changing population, consistent with nurturing greater skills and wellbeing, and more inclusively. Provision should be made as close to where demand arises in an efficient and effective way and should not be an afterthought – provision is essential and should be planned as part of spatial planning. The needs of service providers need to be understood at an early stage to inform future planning. Careful consideration needs to be given to the viability of development.

### **Infrastructure Delivery**

- 3.44. The provision of infrastructure to support existing and new communities is obviously essential. This ranges from transport to education to green space, as discussed in various sections above. In order for infrastructure to be delivered effectively there is a need to:

- understand where demand will arise
  - identify, prioritise and agree on that infrastructure
  - consult with relevant infrastructure providers
  - identify funding mechanisms to enable infrastructure delivery
  - the viability of development.
- 3.45. Funding is secured in a variety of ways including through the collection of Community Infrastructure Levy funds, through s106 agreements, bids and grants administered by GFirst LEP, bids to various Government Agencies and so on. Most of these funding mechanisms are competitive – competition with other areas of the country for private and government investment, competition between competing infrastructure projects within the GSoCG area, or onsite competition between the various demands placed on the development sector. Gloucestershire has a good track record of winning competitive funding and the GSoCG will be a key tool in future bids in articulating the collective ambition and delivery of growth.
- 3.46. At a both a strategic and local, non-strategic level, infrastructure needs are identified in a range of statutory and non-statutory documents including Local Plans, Infrastructure Development Plans and annual Infrastructure Funding Statements, the Local Transport Plan, Education Place Planning Strategies, the Natural Capital initiative and so on.
- 3.47. There is no single source document that identifies the agreed strategic infrastructure requirements for Gloucestershire. Such a document, together with a clear strategic direction of growth in Gloucestershire, would present a solid basis to encourage investment in its various forms from the public and private sector. Furthermore, such an approach would fit well with current proposed reforms to the development contribution regime. The various strategic infrastructure concepts listed in the preceding sections will need to be planned for and funded.
- 3.48. Various pieces of work are either underway or under consideration. The parties are exploring the potential for a single Local Developer Guide for Gloucestershire. This document will provide a clear practice guide for developers on how the parties expect infrastructure to be funded by development, building upon adopted policies and standards set out in local plans.

### **Minerals and Waste**

- 3.49. There are strategic minerals deposits in Gloucestershire that should be secured until they need to be used, perhaps in association with appropriate development. These are dealt with through Minerals and Waste Local Plans developed by the County Council.
- 3.50. Sufficient provision needs to be made for the waste management facilities required to implement a positive and progressive reuse, recycle, recover approach to resources, striving towards the achievement of a circular economy.

**Appendix 3 - List of ‘Agreements’ not agreed by any and/or all parties**

| Agreement Name and Number         | Party/Parties not in agreement | Non agreement paragraph  | Comment  |
|-----------------------------------|--------------------------------|--|--|
| Climate Change agreements 3-6     | Tewkesbury Borough Council     | <ol style="list-style-type: none"> <li>1. The parties agree that the climate and ecological emergencies presents risks to the county that are systemic, and unprecedented in scale and potential impact.</li> <li>2. The parties agree that responses to the climate and ecological emergencies must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.</li> <li>3. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate and ecological emergencies and wherever possible deliver a positive contribution to climate change mitigation and adaptation and ecological recovery. Responding to the Climate Emergency will be the ‘golden thread’ that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.</li> <li>4. The parties agree to investigate the use of alternative forms of energy generation, in line with environmental and landscape considerations.</li> </ol> | <p>TBC requested the deletion of references to “ecological emergencies in paragraphs 3 and 4 and paragraph 3.2 within the Appendix. TBC has not declared an ecological emergency and does not have a position on it. On that basis this is a something TBC is unable to commit to.</p> <p>TBC assert that any considerations of alternative forms of energy generation would be wider than environmental and landscape considerations. This requirement would be up top individual LA’s to take forward if they wished to so do but should not be within SOCG.</p> |
| Transport Provision agreement 18. | Tewkesbury Borough Council     | <p>The Parties agree that local plans should contain policies requiring developments to contribute to quality of the walking and cycling network. This is in recognition of the role active travel will play a significant role in achieving carbon reducing ambitions and promoting a healthy and active</p>  | <p>Due to the nature of the TBC area, the inclusion and assertion that cycling will become mass transit cannot be supported by TBC as it is not achievable and is</p>  |

|  |                                   |  |   |
|--|-----------------------------------|--|---|
|  |                                   | <p>society. <b>Cycling will become mass transit and routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities.</b> Cycling and walking should be at the heart of transport, place-making, and health policy.</p>   | <p>unrealistic given the rural nature of the borough.</p>   |
| <p>Natural Environment and Green Infrastructure agreement 24</p> | <p>Tewkesbury Borough Council</p> | <p>The Parties agree to work collaboratively to help conserve, manage and enhance the area's unique natural environment including areas of international and national landscape and biodiversity importance.</p>   | <p>TBC considers this paragraph too restrictive. Appropriate development can take place within areas of special landscape and AONB.</p>   |
| <p>Minerals and Waste 32</p>                                     | <p>Tewkesbury Borough Council</p> | <p>The Parties will support the form and location of appropriate waste management facilities to positively support a progressive approach to waste management and press on with the move towards a circular economy. The Parties will actively discourage waste management facilities that do not contribute to the development of the circular economy.</p> | <p>TBC consider that the wording within this agreement is too restrictive as to where the council may wish to locate waste management facilities.</p>   |
| <p>Minerals and Waste 34</p>                                     | <p>Tewkesbury Borough Council</p> | <p>The Parties will seek to produce a reduction in the level of energy use, and this will be sought in part by the requirement for the incorporation of the most appropriate advanced technologies for energy generation from renewable sources and for energy conservation as part of significant new development schemes.</p>                              | <p>This is too restrictive. TBC is already looking at alternative sources of energy. It is helpful for the council to facilitate alternative forms of energy and to ensure that people have choice.</p> |



Appendix 4 - Pro-forma Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground

| Strategic Matter                             | Proposed Action | Anticipated Action Outcome | Action Timeline | Action Budget | Action Lead Officer | Action Team |
|--|-----------------|----------------------------|-----------------|---------------|---------------------|-------------|
| Climate Change                               |                 |                            |                 |               |                     |             |
| Housing                                      |                 |                            |                 |               |                     |             |
| Employment                                   |                 |                            |                 |               |                     |             |
| The Green Belt                               |                 |                            |                 |               |                     |             |
| Transport Provisions                         |                 |                            |                 |               |                     |             |
| Digital Network                              |                 |                            |                 |               |                     |             |
| Natural Environment and Green Infrastructure |                 |                            |                 |               |                     |             |
| Energy Production                            |                 |                            |                 |               |                     |             |
| Health and Social Infrastructure             |                 |                            |                 |               |                     |             |
| Infrastructure Delivery                      |                 |                            |                 |               |                     |             |
| Minerals and Waste                           |                 |                            |                 |               |                     |             |