

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Issues and Key Questions consultation

Response of the Cotswolds Conservation Board.

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

Do you recognise the Portrait of the area? Is it representative of the place you live?

Response: Yes, the Board agrees with the portrait

Are the above issues the right ones for the Joint Core Strategy to tackle? How do they relate to the place where you live?

Response: The Board disagrees with the wording of issue 4:

*4. New homes will need to satisfy the **demands** of the current and future population to support greater economic prosperity and address housing affordability.*

The Board would suggest that "needs" is substituted for "demands". There is insatiable "demand" for housing in attractive rural areas such as the Cotswolds, and it should not be an objective of the Core Strategy to attempt to meet this demand.

14. There is a need to improve important transport links to other regions, such as the A417/419 (missing link) and the reducting of the railway link between Swindon and Kemble along with improving transport links between Gloucester, Cheltenham and Tewkesbury.

The Board's Living n Working Sub-Committee is of the view that the reducting of the Swindon to Kemble rail line will reduce the need for extensive works to the A417/419 with respect to peak time congestion problems on that route.

How would you like to see the Vision express the things that are important to you and the places within Joint Core Strategy area that you are interested in?

Response: The vision appears to be silent on matters relating to the conservation and enhancement of the landscape.

¹ Section 87, Countryside and Rights of Way Act 2000.

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

Response: Yes

How do you think Cheltenham can best accommodate future development?

Response: The Board considers that policy references should include ENV3 of the draft SWRSS. This deals with development affecting the Cotswolds AONB which may be located outside the AONB, as potentially is the case mainly south of Cheltenham

Looking at the table and alternatives above, do you have any views on where development should be focussed?

Response: The Board is of the view that the majority of development should take place in or adjacent to existing urban areas. Development in rural, areas should be to meet rural needs only.

What role do you think Sustainable Urban Extensions should play within the wider Joint Core Strategy area?

Response: The Board considers this approach is helpful in providing adequate infrastructure.

Please choose which six of the above that you would make the priority to be secured through development proposals.

Response: The Board considers the entire proposed infrastructure requirements are of importance. Priority should be determined on a site by site basis.

What approach do you think should be used to bring forward urban regeneration sites?

Response: No comment

How do you think that the Joint Core Strategy should manage the phasing of urban regeneration and greenfield development?

Response: The Board supports: *The Joint Core Strategy could include a phasing policy that allows both urban and Greenfield sites on the edge of the urban area to come forward together at the same time, for the reason given.*

What approach to securing affordable housing should be adopted in the Joint Core Strategy?

Response: The Board would support a 40% requirement. However, consideration should also be given to allocating 100% affordable housing sites, not just relying on exception sites for such provision.

What approach should the Joint Core Strategy take to deliver sustainable buildings?

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Response: No comment

What approach should the Joint Core Strategy take to renewable energy?

Response: The Board would support: The Joint Core Strategy could adopt a measured proactive approach by identifying areas where renewable energy might be appropriate; for the reason given.

What approach should the Joint Core Strategy take to Flood Prevention?

Response: No comment

What approach should the Joint Core Strategy take to secure better economic growth?

Response: The Joint Core Strategy could endorse a continuation of a dispersed and diverse economy, including flexible allocations and a greater variety of employment in rural areas. However, such an approach would have to take account of environmental constraints.

Should town centres be expanded or should the focus be on regenerating existing town centre sites?

If you think town centres should be expanded, where do you think would be the most appropriate location?

What should the future roles and relationship be between Gloucester City and Cheltenham?

Response: No comments

What approach should the Joint Core Strategy take to providing Green Infrastructure?

Response: The Board would support: The Joint Core Strategy to identify a strategic green infrastructure network. Development will need to relate to this and potentially fund improvements to it; for the reason given.

How do you think Gypsy and Traveller sites can best be provided across the Joint Core Strategy area?

Should Gypsy and Traveller / Travelling Showpeople Sites be integrated into the sustainable urban extensions or should they be accommodated elsewhere?

Where could these sites be accommodated?

In identifying locations, is it appropriate to provide a large number of smaller sites or concentrate on providing a smaller number of larger sites?

Response: No comments

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Specific topic areas for which no policy is proposed:

Area of Outstanding Natural Beauty

7.4. Areas of Outstanding Natural Beauty were brought into being by the National Parks and Access to the Countryside Act of 1949. The Countryside and Rights of Way Act 2000 strengthened the conservation and management of Areas of Outstanding Natural Beauty in partnership with local authorities. Furthermore, Planning Policy Statement 7 - Sustainable Development in Rural Areas provides the Government's stance on proposals which affect the Area of Outstanding Natural Beauty. In summary, it sets out that significant weight should be given to the preservation of Areas of Outstanding Natural Beauty in determining any proposals which might affect them.

Should any of the above topics have specific policies within the Joint Core Strategy?

Response: The Board strongly considers that there is a case for the Core Strategy to contain a policy with respect to the Cotswolds AONB. The Board fully accepts that such a policy should not simply repeat current national or regional policies. However, the Board considers that a policy in the JCS should specifically include reference to the Cotswolds AONB Management Plan, The Plan identifies the special qualities of the AONB and the policies for its conservation and enhancement are included therein. This is particularly pertinent in the case of Tewkesbury Borough Council. In October This 2008 the authority endorsed the Management Plan under the provisions of paragraph 6.3 of PPS12. The Board understands that Cheltenham Borough and Gloucestershire County Council are considering endorsement. Whilst no part of the Cotswolds AONB falls with Gloucester City, development in parts of that authorities area may affect the AONB and therefore require consideration under policy ENV3 of the draft SWRSS. The Board would therefore be pleased to work with the Joint Core Strategy team to work up an appropriately worded AONB policy.

How should the Joint Core Strategy ensure that sufficient funding comes forward so that development is supported by the provision of associated infrastructure?

Response: No comment.

If the Joint Core Strategy should adopt a Community Infrastructure Levy approach are there any areas or circumstances where a reduced charge could be appropriate?

Response: No comment.

In addition to these responses , the Board submits the following Position Statements for consideration for inclusion in both policy references and incorporation into relevant JCS policies:

- Affordable Housing
- Housing and Development
- Employment
- Renewable Energy
- Tranquillity and Dark Skies