

Joint Core Strategy Issues & Key Questions – Consultation Report contents

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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 JCS team will produce 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, 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 concerns, as well as meeting Government tests of soundness, extensive consultation exercises have been conducted and will continue through the strategy's development. The first stage in this process is the *Issues and Key Questions* consultation, which is intended to generate debate before detailed options are developed.

Public consultation on the *Issues and Key Questions* document ran from 23rd November 2009 to 19th February 2010. The JCS team then embarked on stakeholder consultation with Parish Councils, discussing both the *Issues and Key Questions* document and the public's response to it. 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. Further stakeholder consultation will continue in parallel with the drafting of *Preferred Options* for development across the JCS area. These options will be presented for public consultation in October/November 2010.

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. Public exhibitions

A total of 17 manned exhibitions 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 or take away.

4. 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

5. 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.

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B. Consultation event responses

Regional planning

As this report was written (May 2010), significant questions remain unanswered about 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.

6. 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.

It is important to note that the exercise's primary purpose 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.

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). Most respondents engaged with the exercise in a constructive way, but Officers were not able to police responses, meaning participants could place multiple dots or none, hence the limitations implied above.

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. As indicated above, this should **not** be viewed as robust evidence of support/opposition for development on any specific site, but does suggest general patterns worthy of further investigation:

- 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.

7. 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.

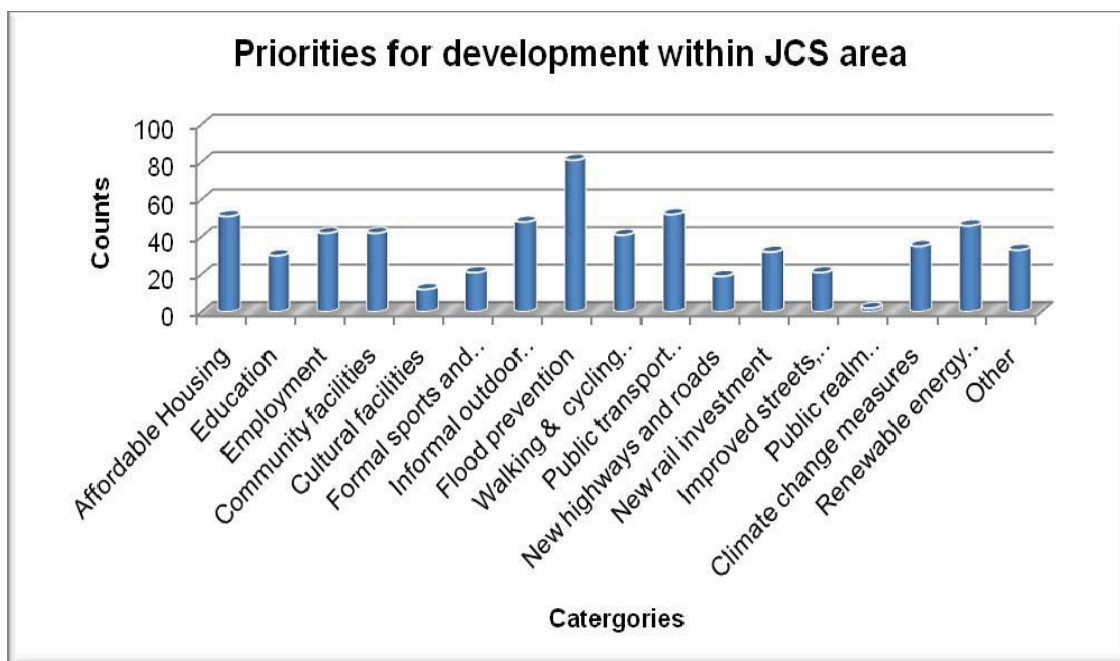
A more detailed summary of these responses is provided in Appendix D. It is important to note that this exercise was intended primarily as a means to engage visitors, stimulate debate and share ideas (and was very successful as such). The comments summary shows the broad range of ideas and concerns raised by the public; however comments are not quantifiable due to the informal means of collection – some visitors made multiple comments on single or multiple post-it notes, while others made no comments at all.

8. Short questionnaires

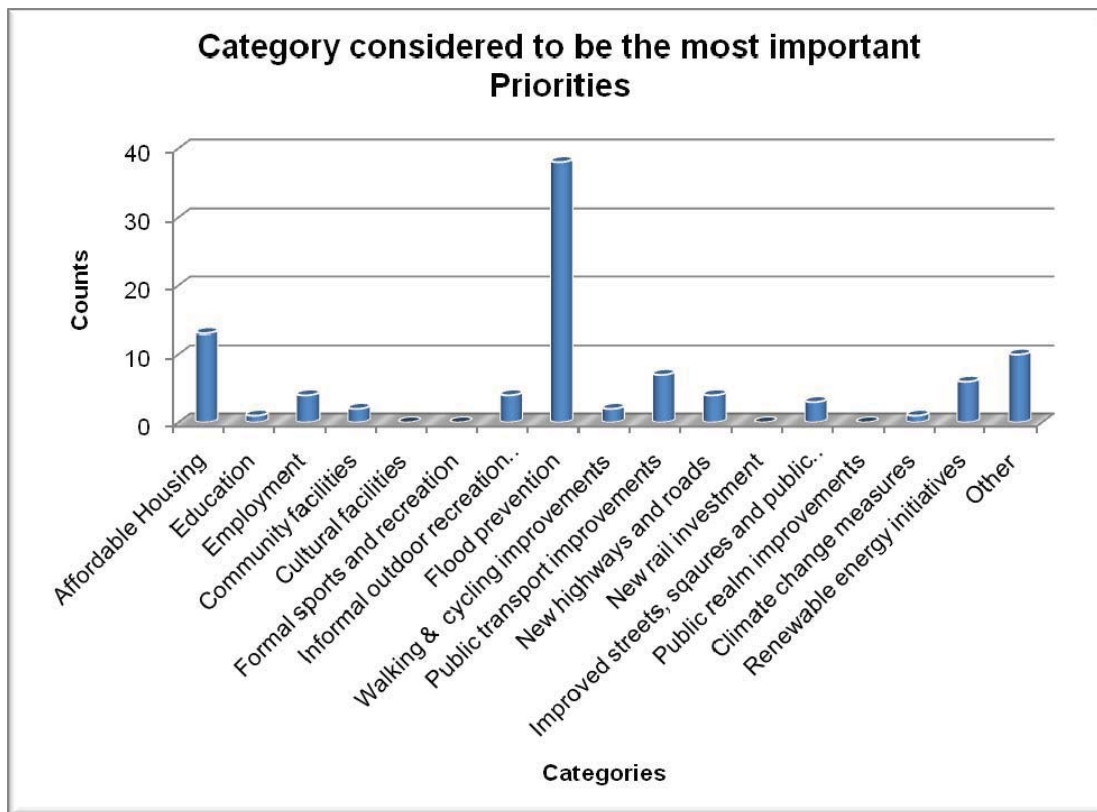
A short, printed questionnaire was provided at exhibitions, to capture the views of people who had an interest in the area/project, but who may not read and formally respond to the full consultation document. The questionnaire consisted of seven sections covering priorities for development and how and where development should be accommodated. A blank copy is provided in Appendix B.

The JCS team 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

9. 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. Written representations

The 'Issues and Key Questions' document was available online throughout the consultation period, allowing comments to be submitted interactively. The public could also 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 does not quantify the responses on opposing sides of controversial issues, as the consultation sought to understand such issues not to take votes on them.

Sources

All representations are reported anonymously. The only exception is to highlight representations from “the development industry” where they differ from those of other respondents.

Quotes

Quotes have been included anonymously throughout the report to illustrate key issues in the words used by respondents. Use of a quote does not suggest greater weight is given to a particular point of view, and balanced quotes have been presented wherever possible.

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.

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 will be shared with Gloucestershire County Council. Indeed, the JCS team is working closely with the County Council, supporting their parallel development of the Strategic Infrastructure Delivery Plan (SIDP), which will address transport, waste management and education in detail, and which will inform the 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>

10. 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.
- 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.
- Address rural and urban areas/issues in a balanced way.
- 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.
- Address inequalities in wealth, housing, education, employment and infrastructure provision.
- 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.
- Provide for high design standards in all new development, regeneration and refurbishment, from major projects to street furniture.
- Collaborate with neighbouring authorities at all scales (local, county and regional).
- List all evidence and source documents.

“The role of the Core Strategy is to provide the overall vision for how places should be developed. The Core Strategy must include strategic objectives that are a response to key challenges or issues faced by an area. It must also include a delivery strategy... to demonstrate how the strategic objectives can be met or achieved. The Core Strategy must provide clear spatial choices and strong direction as to the broad location of future development. This should provide a clear steer for decisions on planning applications as well as to inform other Development Plan Documents.”

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.
- Protect environmental designations and restrict urban sprawl.
- Direct development to brownfield sites before Greenfield.

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

“The economic growth estimates that underpinned the housing forecast for the South West were highly speculative even a few years ago, and are now much more speculative at the height of the economic recession. It will take many years for growth to return to 3% per annum, and there are more and more people who believe that it never will. That destroys the underlying rationale behind the arbitrarily imposed housing mandate.”

“The Core Strategy is not a vehicle to repeat or debate discussion of matters settled within RPG10 in an attempt to find an alternative spatial strategy to that included within the emerging Regional Spatial Strategy... The fundamental spatial strategy for the Joint Core Strategy area, the scale, distribution of growth and the manner in which future development needs are to be met has been debated extensively through the RPG / RSS processes and found to be appropriate through independent scrutiny at the Examination in Public and enshrined as principles within the Secretary of State's Proposed Changes.”

“Prosperity and affordability are important, but not at the expense of sustainability.”

“At my great age, I can say that planning decisions should be taken with serious regard to posterity... Once the beautiful landscape and character of this unique [area have] been destroyed they can never be recaptured.”

11. 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”.
- The objectives restate the requirements of the RSS and then suggest unrealistic options that include ignoring the requirements of the RSS.
- The objectives do not focus sufficiently on the key issues (as required by Planning Policy Statement 12): the economy, jobs and housing need.
- 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.
- 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.
- 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.

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.
- To promote, protect and enhance the vitality and vibrancy of the area's city and town centres.
- To seek delivery of additional renewable energy generation capacity in the JCS area.
- To provide a sufficient quantity and range of housing to ensure that local needs and demands are met throughout the plan period.

- 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.
- 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).
- 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.

12. 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.
- 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, plus better public transport, walking and cycling routes.
- Good access to the countryside and green spaces.

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;
- Cheltenham’s vision may centre on finding an acceptable suite of provisions to meet housing and employment needs; and
- Tewkesbury’s vision may centre on improving its attractiveness as a historic market town.
- A specifically-rural vision was suggested (in response to criticisms of its absence) as follows:

"By 2026 rural areas will be economically prosperous and fully playing their part in Gloucestershire's economy. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and ready availability of affordable housing for local people. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The Green Belt will be managed to enhance its contribution to the landscape, biodiversity and access, and will have been extended to the north of Cheltenham and to the south of Gloucester".

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

One statutory consultee suggested that “the vision should be more visionary”, for example: “rather than minimizing contribution to climate change, why not have a vision of making no contribution? [Why not] be a net producer of sustainable energy and water neutral by 2026?”

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

13. 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.
- 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.
- 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.
- 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.

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

“We wish to see a vision of a lower carbon future. By 2026, society will have had to make significant changes working towards meeting the legally-binding target for a 60% cut in CO2 by 2050 (under the Climate Change Bill). These changes must be set in place during this plan period, and a vision which recognises this and considers how our daily lives may be different as a consequence is vital.”

“Climate change is possibly the greatest long-term challenge facing the world today.”

“The delivery of infrastructure and behavioural change to support sustainable modes of travel is both effective and essential as a means of ensuring the JCS achieves its objective of addressing climate change.”

“Maximising the use of renewable energy in new development is very welcome. However, the reality is that new development will only ever represent a minor proportion of all existing development in the JCS area. Therefore, for the JCS area to make a meaningful contribution to renewable energy generation, stand-alone, commercial-scale, renewable energy development should be supported. Renewable energy generation embedded in new development will not be enough. Due to the nature of renewable energy development it will necessarily be proposed in rural areas.”

14. 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 planners' resulting 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.

It was clear that some members of the public used the phrase 'affordable housing' in relation to 'cheap market housing' rather than social rented or intermediate ownership schemes – a point which the JCS team must be sure to clarify in subsequent rounds of consultation.

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.
- 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.
- Link new housing provision to job creation.

- 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.
- 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.
- Support intermediate ownership schemes and key worker housing.
- 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.
- 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.
- 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.
- 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.
- Address issues arising from high levels of second home ownership.
- Provide adequate, specialist homes for the elderly, to free-up larger homes for families.
- Ensure no new housing is built adjacent to waste processing facilities.
- 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.

“It would be detrimental to Cheltenham if it were to grow much bigger than at present... The majority of housing that IS needed should be within the existing built-up area and built on previously-developed land with a very high proportion being affordable to first-time buyers.”

“The RSS allocates 34,200 additional dwellings to the JCS area. Using the government's density targets of 35-50 dwellings per hectare... the three JCS authorities will have to find over 855 hectares of housing land, plus supporting infrastructure... and 118 hectares for employment... The additional dwellings together with the employment land are unacceptable, unfair and unreasonable.”

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).

- 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.
- Avoid site-specific affordable housing targets.
- Balance affordable housing targets with the cost of other Section 106 priorities (e.g. education, emergency services).
- Set a threshold for affordable housing of 15 units in line with PPS3.
- 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.
- Include a viability assessment of affordable housing targets as part of the evidence base.
- Include a robust series of site allocations to be tested through the examination process.

See also section 18, Deliverability and phasing, below.

“A reduction in the level of housing... below that in the emerging RSS must not be entertained as this would risk worsening the need for housing... and would cause further problems of affordability. This would be contrary to the aims and objectives of PPS3 (paragraph 10) and the Community Strategy.”

“The target for delivery [of affordable housing] must not be set at a level which would prevent residential development from coming forward in the first place and hence create a greater affordability problem than it would solve.”

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.
- 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.
- Encourage full use of any under-utilised existing sites (e.g. by refurbishment), then consider extension of these sites where appropriate.
- 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.
- Provide a number of smaller sites (10 pitches or less) rather than concentrating provision in large sites or in one area.
- Develop brownfield sites before greenfield, avoiding sites at risk of flooding (due to the particular vulnerability of caravans).
- Ensure good local access to schools, doctors and other essential services to reduce the need for long distance travel.
- 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.
- Prevent the purchase of farm land by Gypsies and Travellers for permanent occupation.
- 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.
- 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.
- Consider producing a joint dedicated Gypsy and Traveller Development Plan Document (DPD).
- Incorporate Site Grant Guidance (Homes and Communities Agency, Jan 2009).

15. 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.
- 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).
- 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).
- 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.
- 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.
- 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).
- Avoid the significant loss of accessible urban employment land to other uses as part of regeneration projects.
- Balance manufacturing and service industries, and support agriculture.
- 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
- Secure prompt deployment of high-speed broadband and provide for telecommunications (in line with PPG8).
- 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
- Support development of high-tech industry across the JCS area.
- Include employment uses and live/work units in any urban extensions.
- 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.
- 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.
- Enforce green transport plans of major employment sites (GCHQ was criticised for failing to follow its own plan).
- Competitively price the park and ride schemes (Cheltenham was described as being more expensive than both Bath and Oxford).
- 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).

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

"Remedying the shortfall of employment land... is a high priority. The RDA outlined that [the] local economy was at a high risk as a consequence of having an insufficient employment land supply."

"The wealth creating/service industry balance of Cheltenham, which is currently 35:65, needs to be addressed to bring it towards 50:50, and more in line with the other towns in the area."

16. 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.
- 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.
- Re-use existing buildings where possible (new is not always best or most sustainable).
- 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 sited as a good example). This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.
- 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.
- 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.
- Make better use of vacant shop units and empty properties above shops (e.g. for affordable housing).
- 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.
- Maintain provision of public conveniences.
- Restrict street clutter and promote high-quality public spaces, signage and street furniture.
- 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.

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.
- 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.

“The spatial strategy... should conform to that set out in RPG10 and the emerging RSS. This is based upon sound planning principles proposing to accommodate development in the most sustainable manner by guiding most new development to... Strategically Significant Cities and Towns (SSCTs), thereby seeking to minimise the distance people travel between home and work and the services which they require. It is these settlements that offer the greatest opportunities for employment, have the majority of services, as well as the highest levels of accessibility including by public transport.”

“Sites that still remain to be redeveloped will have complex technical and financial barriers to development; otherwise they would have been developed during the previous economic cycle. By having a dialogue, it allows Officers to better understand the aspirations of the landowners and appreciate how the blanket application of planning obligations or development standards can thwart the delivery of development sites. In short, regeneration cannot and should not be a top-down Council-driven exercise where Officers put unrealistic expectations forward in isolation. Instead it should be an inclusive process in which the aspirations of the landowners/developers are fully understood and taken into account, along with the technical challenges facing the development of the sites in question.”

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.
- Set out GHURC’s programme area, key projects, and programmed outputs for each site.
- Expand the city centre to take in the Western Waterfront areas to the west and north-west.
- Improve linkages between the city centre, the regeneration areas around the waterfront, and the existing retail facilities at St Oswald’s Park.
- Include Eastern Avenue in proposed regeneration sites.

Cheltenham:

- Focus development on the lower High Street and better link the Brewery development to the town centre.
- Remove the bus stops from the Promenade, to improve the pedestrian environment.
- Support specialist shopping areas (e.g. Montpelier and the Suffolks) through provision of nearby street parking.
- 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.
- Ensure new building delivered through the Civic Pride Initiative is of the highest standards of design and sustainability.
- Regenerate Coronation Square.

Tewkesbury Town:

- Create a Tewkesbury Town Centre Masterplan / Development Framework (as currently proposed).
- Improve the relationship between the town and its waterways to enhance the leisure and tourism offer.

- Enhance the local, friendly, independent feel but improve facilities to enhance and retain retail spending and to improve visitor numbers/duration of stay.
- Improve and diversify employment opportunities.
- Consider a bypass to reduce air pollution/traffic problems.
- Address the role and scale of commercial development at M5 junction 9.
- 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.

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.
- Protect the AONB, Green Belt and productive agricultural land – as detailed in section 13, Sustainability.
- Provide affordable housing – as detailed in section 14, Housing.
- Support the rural economy – as detailed in section 15, Employment.
- 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.
- 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.
- Provide better access by public transport to urban centres from rural areas.
- 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.

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.

“The focus on extending Cheltenham and Gloucester must not happen at the expense of smaller villages where pubs, post offices and local shops are closing, public transport is reducing, and local housing is unaffordable. Where a local need is identified and sanctioned by local people, limited house building should be permitted in order to breathe life back in to rural communities.”

“Whilst the aspiration of the Draft RSS is to concentrate development at the Strategically Significant Cities and Towns, smaller settlements which provide a good range of facilities i.e. school, shop, bus services etc, need to be permitted to grow to maintain their viability and attract a wide range of age groups.”

17. 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.
- Prevent urban sprawl and the coalescence of settlements.
- Protect the unique character of the area and its settlements.
- Avoid overwhelming existing transport and social infrastructure with further population growth.
- Re-use brownfield sites and empty buildings (which benefit from existing infrastructure, services, facilities and access) before greenfield sites.
- 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).

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).
- Ensure the necessary infrastructure is in place prior to construction/occupation of housing (see also section 18, Deliverability and phasing, below).
- 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.
- Ensure SUEs are designed to reduce waste, and equipped to process their own waste.
- Provide a full-access Junction 10 if major development goes ahead in northwest Cheltenham.

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.

"Unless and until incontrovertibly proved to be necessary for local need, so-called Sustainable Urban Extensions of the type, spread and locations proposed in the RSS should not be permitted. The priority should be to accommodate as much housing as possible within the existing urban areas accompanied by reasonable small scale development of larger villages... There should be no development of housing in the Green Belt..."

"Should some form of sustainable urban extension prove to be necessary in the longer term, each should be planned comprehensively to the highest standards and only after appropriate, comprehensive environmental assessment, taking into account the current climatic conditions. In advance of occupation of any homes, [developments] must be provided with full infrastructure including highways to prevent from overstressing existing facilities in neighbouring communities. SUEs should be self contained... so as not to drain the resources of the surrounding areas. High quality public transport links with the existing urban centres should be provided with a reassessment of the road requirements in the surrounding area."

"I am not persuaded that these Urban Extensions represent the most effective way of meeting demand for new housing, and I am deeply suspicious of the idea that such extensions could be delivered in any kind of genuinely sustainable way. Were any sustainable urban extension to be given planning permission, it is critical that employment opportunities and the proper facilities should be provided. The idea of creating a new generation of soulless, workless, dormitory suburbs... is utterly repugnant... There is little evidence of successful investment in such facilities going on anywhere in the UK... and the vast majority of new, large housing schemes are progressing in the same old way: build the houses first, and then worry about the missing infrastructure. House builders will say anything to get permission to build, and will then deliver very little by way of the desired infrastructure."

"The Sustainable Urban Extensions should have a clear purpose while extending the identity of the existing town or city. They should provide safe and secure environs that enable people to move freely, supply a clear transport infrastructure, able to offer community facilities, while offering local employment and retail opportunities."

"It is recognised that the requirement for new homes cannot be met solely within the existing urban areas... [and] the most sustainable solution is to develop extensions to existing urban areas"

"In principle, sustainable urban extensions will play a critical role in the delivery of the spatial strategy and sustainable growth as part of the JCS. Therefore, and having regard to their likely size, it is appropriate for the JCS to include relevant policies and the general extent of sustainable urban extensions. The precise boundaries and form of any sustainable urban extension can appropriately be the subject of a master planning exercise as part of the planning application process or a Supplementary Planning Document."

"The objections of the Local Authorities to the contents of the... Draft RSS are noted, however additional housing WILL BE REQUIRED and it is essential that the JCS provides sustainable urban extensions to allow the region to grow and not stagnate/decline due to under investment in the future of the area. Proposed urban extensions should provide employment opportunities AT LEAST in proportion to their potential population."

18. 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.

"We welcome an approach to developer contributions that improves certainty and transparency within the bounds of viability..."

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).
- Permit reduced charges only in relation to green/biodiversity and community projects.
- Secure climate change amelioration measures and renewable energy initiatives as part of planning conditions.
- 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.
- Ensure new social infrastructure is in place prior to the occupation of new development.

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.

"We are in favour of a strong phasing policy that would ensure urban sites are brought forward ahead of greenfield sites, and indeed that greenfield sites are only developed if insufficient urban sites exist."

"We would support a robust phasing policy that ensures brownfield sites within urban areas are brought forward first. Without such a policy, there is a high risk developers will 'cherry-pick' easy, greenfield opportunities and the urban regeneration imperative will be seriously undermined."

"Brownfield sites should take priority over greenfield releases. Brownfield sites carry greater difficulty in assembling an appropriate and viable form of development when compared with the less problematic greenfield sites. It would run counter to the aim of Urban Regeneration to further compromise the ability to develop brownfield sites by allowing easy greenfield options an equal status in terms of the phasing of land releases."

"[Consider introducing a] phasing policy that promotes preferred sites on the basis of overall sustainability i.e. least environmentally damaging, greatest local need etc"

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

"It is critical that flexibility is encouraged in the Joint Core Strategy if... difficult sites are not to sit vacant for many more decades."

"The residential component of the urban regeneration sites is likely to be primarily apartment-based which, whilst an important component of housing supply, will not address the need for family housing. Family housing meanwhile is more likely to be delivered on greenfield sites where more land is available to deliver this type of housing. The urban regeneration sites and greenfield land are therefore complementary rather than competing and for that reason we believe it is entirely unnecessary to incorporate a phasing policy."

"We are firmly opposed to a phasing policy which seeks to ensure that sites within the urban area are brought forward in advance of those on the edge of the urban area. If there are delays in the delivery of the brownfield sites then, if such a phasing policy is in place, no housing will be delivered at all."

"The release of urban brownfield land is seriously constrained, therefore it is necessary to avoid a phasing policy [for housing or employment land] and allow the market to bring forward sites as necessary. Any other approach would fail the test of soundness requiring flexibility."

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:

"(This) view appears to be based on the assumption that the brownfield supply represents a 'once and for all' opportunity that will ultimately be exhausted. The evidence from the recent past suggests that this may not be true. It would appear that brownfield opportunities arising largely from redundant industrial areas are being supplemented by new opportunities generated as organisations and institutions seek greater efficiencies in the way they operate. As a result schools, hospitals and defence establishments have been declared redundant. It would be impractical to await the 'end' of the supply of brownfield locations." (paragraph 4.0.25)

Furthermore:

"Objection is raised to the implication... that urban extensions will adversely impact on the regeneration of Gloucester and Cheltenham. This assertion was rejected by the RSS Examining Panel (paragraph 4.3.40) and insofar as Gloucester is concerned at the Longford Inquiry (IR paragraph 183) and the Hunts Grove Inquiry (IR paragraph 198)."

19. 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).
- Re-define the flood zones to incorporate local knowledge – and a margin to account 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).
- 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.
- Ensure new development does not increase (and should be designed to reduce) flood risk to existing properties.
- 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.
- 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).
- 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.
- 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.
- Incorporate River Severn Catchment Flood Management Plan policies.
- 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.

- Consider producing a full Water Cycle Study as part of the evidence base.
- Consider including dedicated policies covering water quality and land contamination.

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.

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.

“I particularly object to building on known flood plains and on land that regularly floods after heavy rainfall.”

“It is vital that the outcomes and recommendations of [the] Surface Water Management Plan are taken forward into a Level 2 SFRA, and that appropriate Flood Risk policies are included in the Core Strategy along with Supplementary Planning documents.”

20. 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.
- 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).
- “Green” the existing urban fabric where possible.
- Support the establishment of a new regional park.
- Provide new and complementary, linked habitats and green spaces in the Severn Vale.
- Provide a mix of formal and informal open spaces.
- Support the provision and expansion of allotments, community orchards and community composting (linked to local food schemes, see also section 13, Sustainability).
- Promote biodiversity and habitats (through a dedicated set of policies, not as an add-on).
- 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.
- Address the business opportunities associated with Green Infrastructure and links with an emerging greener economy.
- Retain access to the countryside for existing communities on the urban-fringe.
- Maintain footpaths/rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces.
- Support farmers as “the guardians of the countryside”.
- Support the provision of green burial sites.

“We would like to see a green infrastructure strategy developed for the Joint Core Strategy, which reflects the importance of accessible native woodland.”

“Green infrastructure should be included in all new development, urban regeneration and business areas. There is a need to protect and maintain the existing green assets in urban areas and to develop adequate open spaces and links between them to improve the quality of life for residents and for the protection of wildlife. There should be positive management of the existing Green Belt to enhance its contribution to the landscape and biodiversity. Public access to Green Belt land should be an additional strategic objective.”

21. 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
- Car parks north of the town centre – suitable for high density housing, multi-storey parking, and office use, no retail
- Land at the Hayloft, Cheltenham – suitable for housing development if exceptional circumstances for Green Belt development can be proven
- Land at Badgeworth Road, Cheltenham – suitable for mixed-use development if exceptional circumstances for Green Belt development can be proven
- 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
- Hunting Butts Farm, Cheltenham – suitable for housing development
- Blakeway/Berry land, Cheltenham – suitable for housing development
- Briarfields – suitable for housing/mixed-use development
- Cheltenham bus station – suitable for regeneration as mixed-use / entertainment area
- Land at Badgeworth Road, Cheltenham – suitable for employment uses
- Land at Prestbury – suitable for housing development
- Northwest Cheltenham – suitable for mixed-use, residential and employment development
- Land at Hyde Farm, Cheltenham – suitable for housing development

Gloucester urban area

- All GHURC sites – suitable for mixed-use development
- Kings Quarter – suitable for mixed-use development
- Land at Naas Lane – suitable for employment development
- The Knoll, Stroud Road – suitable for housing development
- Helipebs (Holdings) Ltd land at Sisson Road – suitable for housing development
- Corncroft Lane, Matson – suitable for housing development
- Sylvanus Lyson's Charity land at Hempsted – suitable for housing development
- Hempsted Lane – suitable for housing development
- Gloucester Railway Triangle – suitable for a new prison
- Gloucester Railway Triangle and Great Western Road Yard – suitable for housing development
- Site SUB17 – suitable for housing development
- Winneycroft Farm – suitable for housing development
- Elmbridge and Pirton Court – suitable for housing, mixed-use, park and ride, transport hub
- Eastern Avenue/Barnwood – suitable for employment development
- Bristol Road/Olympus Park/Waterwells – suitable for employment development
- Gloucester Business Park – suitable for employment development

Tewkesbury urban area

- Northway – suitable for retail park, e.g. Ikea
- Ashchurch MOD base (if closed) – suitable for employment development
- Mythe land – suitable for housing development
- Mitton land – suitable for housing development
- Wingmoor Farm – to be returned to community use as public open space
- 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
- Land at Tewkesbury Park Fields (Lincoln Green Lane) – suitable for housing development
- Land at Tying House – suitable for housing development
- Land at Banady Lane – suitable for housing development
- Land at Banady Lane – suggested for designation as Important Open Space
- Land at Two Hedges Road – suitable for housing development
- Land at Stoke Orchard (Coal Research Establishment) – suitable for mixed-use development
- Land south of Bredon Road – suitable for housing development

22. 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

Issues & Key Questions – Consultation Report

D. Outcomes

23. Common ground and competing viewpoints

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.

24. Next steps

The JCS team is analysing this report alongside all other evidence gathered with a view to developing options, for further public consultation in October/November 2010.

25. 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>Some exhibitions benefited from ‘passing trade’ attracted by other events happening at the same time and location</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. public exhibitions to close at 7pm, rather than 8pm</p> <p>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</p>
<p><i>Members</i></p> <p>Need to maximise attendance by Members</p> <p>Better response obtained from Members by letter than email</p>	<p>Continue to maintain up-to-date list of all Council meeting dates and plan consultation events accordingly</p> <p>Inform Members of JCS process and activities by letter – consider duplicate email clearly flagged as such</p>
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	
<p>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.</p> <p>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</p>	<p>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)</p>
<p>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</p>	<p>Provide neat, clearly-labelled deposit boxes for questionnaires at all events</p>
<p>Some respondents were unsure of terminology used in the questionnaire despite efforts to employ plain English – specifically: 'public realm'</p>	<p>Ongoing review of materials for consistent use of plain English</p>
<p>Dot-maps worked well as posters, but also when placed on tables with seating where they became centres for some prolonged and interesting debates</p>	<p>Provide tables and chairs with dot-maps where possible</p>
<p>The A3 constraints map was not easy to read for some respondents</p>	<p>Review colour-coding of constraints map</p>
<p>Some respondents requested more detailed, local maps to aid discussion of local issues</p>	<p>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</p>
<p>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</p>	<p>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</p>
<p>Some display stands were looking tired by the end of the consultation period</p>	<p>Replace any damaged display stands, or rotate for newer ones as necessary</p>