



Planning Policy Sub Committee

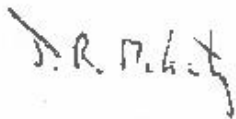
Meeting: Thursday, 17th September 2015 at 6.00 pm in Civic Suite, North Warehouse, Gloucester Docks, GL1 2EP

Membership:	Cllrs. Taylor (Chair), Lewis (Vice-Chair), McLellan, Smith and Dee
Contact:	Tony Wisdom Democratic Services Officer 01452 396158 anthony.wisdom@gloucester.gov.uk

AGENDA

1.	APOLOGIES To receive any apologies for absence.
2.	DECLARATIONS OF INTEREST To receive from Members, declarations of the existence of any disclosable pecuniary, or non-pecuniary, interests and the nature of those interests in relation to any agenda item. Please see Agenda Notes.
3.	MINUTES (Pages 5 - 8) To approve as a correct record the minutes of the meeting held on 18 June 2015.
4.	PUBLIC QUESTION TIME (15 MINUTES) To receive any questions from members of the public provided that a question does not relate to: <ul style="list-style-type: none"> • Matters which are the subject of current or pending legal proceedings, or • Matters relating to employees or former employees of the Council or comments in respect of individual Council Officers
5.	PETITIONS AND DEPUTATIONS (15 MINUTES) To receive any petitions and deputations provided that no petition or deputation is in relation to: <ul style="list-style-type: none"> • Matters relating to individual Council Officers, or • Matters relating to current or pending legal proceedings

6.	<p>STROUD DISTRICT COUNCIL LOCAL PLAN - CONSULTATION ON FURTHER POST SUBMISSION PROPOSED CHANGES (INCLUDING FURTHER POTENTIAL MAIN MODIFICATIONS) (Pages 9 - 16)</p> <p>To receive the report of the Head of Planning which seeks endorsement of Paragraph 4.3 as the Council's formal response to the consultation.</p>
7.	<p>CHELTENHAM PLAN 2011-2031 ISSUES AND OPTIONS - PUBLIC CONSULTATION (Pages 17 - 26)</p> <p>To receive the report of the Head of Planning which provides an overview of the key issues in relation to the Cheltenham Plan 2011-2031 and which seeks endorsement of Appendix 1 as the Council's formal response to the consultation.</p>
8.	<p>INTERIM PLANNING POLICY FOR MOBILE CATERING UNITS</p> <p>To receive the report of the Head of Planning which proposes an interim planning policy for mobile catering units for use in development management purposes.</p> <p>TO FOLLOW</p>
9.	<p>DATE OF NEXT MEETING</p> <p>Thursday 17 December 2015 at 18.00 hours.</p>



Jon McGinty
Managing Director

Date of Publication: Wednesday, 9 September 2015

NOTES

Disclosable Pecuniary Interests

The duties to register, disclose and not to participate in respect of any matter in which a member has a Disclosable Pecuniary Interest are set out in Chapter 7 of the Localism Act 2011.

Disclosable pecuniary interests are defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 as follows –

<u>Interest</u>	<u>Prescribed description</u>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the Council) made or provided within the previous 12 months (up to and including the date of notification of the interest) in respect of any expenses incurred by you carrying out duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between you, your spouse or civil partner or person with whom you are living as a spouse or civil partner (or a body in which you or they have a beneficial interest) and the Council (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged
Land	Any beneficial interest in land which is within the Council's area. For this purpose "land" includes an easement, servitude, interest or right in or over land which does not carry with it a right for you, your spouse, civil partner or person with whom you are living as a spouse or civil partner (alone or jointly with another) to occupy the land or to receive income.
Licences	Any licence (alone or jointly with others) to occupy land in the Council's area for a month or longer.
Corporate tenancies	Any tenancy where (to your knowledge) – (a) the landlord is the Council; and (b) the tenant is a body in which you, your spouse or civil partner or a person you are living with as a spouse or civil partner has a beneficial interest
Securities	Any beneficial interest in securities of a body where – (a) that body (to your knowledge) has a place of business or land in the Council's area and (b) either – i. The total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or ii. If the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, your spouse or civil partner or person with

whom you are living as a spouse or civil partner has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

For this purpose, “securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

NOTE: the requirements in respect of the registration and disclosure of Disclosable Pecuniary Interests and withdrawing from participating in respect of any matter where you have a Disclosable Pecuniary Interest apply to your interests and those of your spouse or civil partner or person with whom you are living as a spouse or civil partner where you are aware of their interest.

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For further details and enquiries about this meeting please contact Anthony Wisdom, 01452 396158, anthony.wisdom@gloucester.gov.uk.

For general enquiries about Gloucester City Council’s meetings please contact Democratic Services, 01452 396126, democratic.services@gloucester.gov.uk.

If you, or someone you know cannot understand English and need help with this information, or if you would like a large print, Braille, or audio version of this information please call 01452 396396.

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- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building; gather at the assembly point in the car park and await further instructions;
- Do not re-enter the building until told by a member of staff or the fire brigade that it is safe to do so.



PLANNING POLICY SUB COMMITTEE

MEETING : Thursday, 18th June 2015

PRESENT : Cllrs. Taylor (Chair), McLellan, Smith and Dee

Officers

Claire Rawlings, Principal Planning Officer
Philip Bylo, Interim Planning Policy Manager
Tony Wisdom, Democratic Services Officer

APOLOGIES : Cllr Lewis

1. APPOINTMENTS MADE AT ANNUAL COUNCIL

Chair – Councillor Taylor.
Vice-Chair – Councillor Lewis.

2. MINUTES

The minutes of the meeting held on 26 March 2015 were confirmed and signed by the Chair as a correct record.

3. DECLARATIONS OF INTEREST

No declarations were made on this occasion.

4. PUBLIC QUESTION TIME

Mr Steve Morgan asked the following questions and he indicated that a written response would be acceptable:-

1) Would the Chair agree with me that it would be both perverse and patently undemocratic if Gloucester City Council, in any way, determined a planning application for any large green field site which had not been considered as part of the City Plan so far?

Item 4 of the Update Report to be considered tonight as item 7 on the agenda includes at 4.1, and I quote, “The ward profiles provide an evidence base for the whole of the City.”

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18.06.15

It is my contention that an unidentified site in that public consultation process cannot therefore be considered for development in isolation but would need to wait now to be considered as part of any five year review of the eventually accepted Local Plan. Would the Chair care to comment please?

The Chair advised that he would ask the Planning Policy Officers to respond in writing but noted that the Council was required to consider valid planning applications submitted and to consider each such application on its merits.

The Principal Planning Officer noted that each application would be considered against the development plan in force at the time which currently was the Second Stage Deposit Local Plan 2002. She noted that it was a developing process and more weight would be given to the City Plan as it developed.

2) My second question relates to the City stock of housing land. Please could I be advised how many years of house building land are currently identified and is this figure reviewed annually or is it a rolling number as permissions are given and built out?

Mr Morgan was advised that there was currently just over five years supply of house building land identified and that the supply was reviewed annually.

5. PETITIONS AND DEPUTATIONS

There were no petitions or deputations.

6. CITY PLAN: PLACES, SITES, CITY CENTRE STRATEGY - RESPONSE TO PUBLIC CONSULTATION

The Principal Planning Officer presented the report which detailed Officers' responses to the comments received to the City Plan: Places, Sites, City centre Strategy consultation held in May 2013.

She advised that Council Officers and consultants from Gloucestershire Rural Communities Council attended 18 separate consultation events which were attended by a total of 995 members of the public. During the consultation period 142 formal questionnaire planning representations were received and the Officer responses were provided at Appendix 1 to the report.

She drew Members' attention to the list of topics receiving 15 or more responses which was detailed at paragraph 4.5 and that additional sites had been identified including land at Whaddon (paragraph 4.6).

She noted that the next stage of the City Plan involved the commissioning of evidence to support plan allocations and the development of policies. The progress of the Joint Core Strategy examination would be followed closely to assess any implications for the City Plan.

Councillor Dee noted that, with the exception of Hempsted, few wards had a body to support a neighbourhood plan. He was advised that the uptake of neighbourhood planning nationally had been poor in urban areas.

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Councillor Smith referred to the need to address the response to the representation regarding the relationship between the City Centre and Gloucester Quays in the light of the recent Peel appeal decision. The Principal Planning Officer assured her that consideration would be given to re-wording the response.

Councillor McLellan believed that the five year housing supply would be increasingly difficult to achieve and asked if the Joint Core Strategy allowed for housing supply outside of the City boundaries to be taken into account. He was advised that this issue had been picked up by the inspector at the JCS examination in public.

Councillor Dee questioned potential allocations not included in the JCS and was advised that the housing requirement had been met by the JCS allocations which were being tested at the examination.

Councillor McLellan referred to policy B2 – Fire Station, Eastern Avenue and requested clarification that the Constabulary no longer required the site. He also noted the need for a policy on food vending vans.

Councillor Dee concurred and also called for consideration of a policy to control hand car washing sites which were causing drainage problems in some locations.

The Principal Planning Officer advised that Officers would consider these issues and report to a future meeting.

Councillor McLellan requested that copies of the responses be sent to all Councillors.

RESOLVED that the representations made to the City Plan: Places, Sites, City Centre Strategy during the public consultation be noted and the resulting officer responses detailed at Appendix 1 be endorsed.

7. STATEMENT OF COMMUNITY INVOLVEMENT

The Principal Planning Officer presented the report which provided an update on the Council's Statement of Public Involvement following public consultation.

Councillor McLellan asked how it was intended to communicate with 'hard to reach' groups. He was advised that the Council would look at those sections of the community that could not reach the usual places for consultation although that would be a resource intensive process.

He referred specifically to Gloucester City Homes and housing association tenants. Councillor Smith advised that they could be reached through the Tenants' Forums.

RESOLVED

- 1) that the minor revisions made to the draft Statement of Community Involvement following public consultation be endorsed; and**

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- 2) **TO RECOMMEND to the Council that the Statement of Community Involvement at Appendix 1 be formally adopted for planning policy and development control purposes.**

8. DATE OF NEXT MEETING

Thursday, 17 September 2015 at 6.00pm.

Time of commencement: 6.00 pm hours

Time of conclusion: 6.35 pm hours

Chair

Gloucester City Council

Meeting:	Planning Policy Sub-Committee	Date:	17th September 2015
Subject:	Stroud District Local Plan Consultation on Further Post Submission Proposed Changes (including further potential main modifications)		
Report Of:	Anthony Wilson, Head of Planning		
Wards Affected:	No		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Philip Bylo, Interim Planning Policy Manager philip.bylo@gloucester.gov.uk 01452 396854		
Appendices:	1 – Hunts Grove Plan		

1.0 Purpose of Report

- 1.1 To provide an overview of the further post submission proposed changes and further potential main modifications (July 2015) and endorsement of Paragraph 4.3 as the Council's formal response to this consultation.

2.0 Recommendations

- 2.1 Planning Policy Sub-Committee is asked to **ENDORSE** Paragraph 4.3 as the Council's response to the Stroud District Local Plan consultation on further post submission proposed changes.

3.0 Background

- 3.1 Stroud District Council has prepared a Local Plan and Policies Map which it submitted to the Secretary of State for Communities and Local Government in December 2013. The Local Plan relates to the whole District and provides a strategy for delivering growth up to 2031. The document provides the vision, objectives and strategic policies for delivering new homes, jobs, facilities and infrastructure.
- 3.2 The Plan has now been examined by an independent Inspector to ensure it is legally compliant and meets the test of soundness. Stage 1 of the examination began in April 2014 and resumed in May 2015. Stage 2 hearings were held in June 2015.

- 3.3 Following the hearings the Inspector has recommended that the Council undertake public consultation on further Post Submission Proposed Changes (“Further Proposed Changes”). A Sustainability Appraisal Addendum (SA) and a Habitats Regulations Assessment (HRA) of the Further Proposed Changes have been prepared and representations are also invited on these documents.
- 3.4 Only comments relating to the Further Proposed Changes, the Sustainability Appraisal Addendum or the Habitats Regulations Assessment will be considered by Stroud District Council and the Inspector before he reaches his final conclusions about the legal compliance and soundness of the Plan.
- 3.5 The period for submission of representations ran for six weeks from Wednesday 29 July 2015 until Wednesday 9 September 2015.
- 3.6 An interim response was provided to Stroud District Council prior to the 9 September, and this response will be formalised following member agreement of this report.
- 3.7 The last report received by members on the Stroud District Local Plan was at the 28 November 2013 council meeting, which provides a useful context to this report which focusses only on the further potential main modifications.

4.0 Key Issues and Proposed Response

- 4.1 Officers have reviewed the consultation on further post submission proposed changes and consider the key issues of significance for Gloucester City to be the following:
1. The 2006 to 2031 housing delivery target is proposed to be increased from 9,500 to 11,400 dwellings;
 2. Stroud also propose to provide an additional 950 car home bed spaces during this period;
 3. The jobs provision figure for the period is proposed to increase from 6,200 to between 6,800 and 12,500 jobs;
 4. The employment land proposed to be provided has increased from 38ha to 58ha (B1-B8) 2006 to 2031;
 5. An early review of the plan is proposed within 5 years of adoption or by December 2019 whichever is the sooner;
 6. The Hunts Grove extension is proposed to increase from 500 to 750 dwellings (this will bring the total at Hunts Grove to 2,500 dwellings);
 7. New land is proposed to be released to the south of the Hunts Grove extension (approx. 7.6 ha) to facilitate the 250 dwelling increase. Please refer to the Hunts Grove plan at Appendix 1 which shows the Hunts Grove development area and the Hunts Grove extension comprising a total of 138 ha;
 8. The affordable housing target is proposed to remain at 30%, however affordable housing provision is now proposed to be on site for sites of 11+ dwellings, and off-site contributions are proposed to be sought for 10 units or less;

9. A Supplementary Planning Document (SPD) is proposed to be produced providing further detail for the affordable housing requirements.

4.2 The increases in the housing and employment needs for Stroud are not unexpected given the increased pressure that the Joint Core Strategy (JCS) is experiencing on these issues at the current time at its examination. Nevertheless the proposal to accommodate some of the additional housing need at Hunts Grove is unfortunate given our previous objections to Hunts Grove development and our concern expressed with regard to the level of infrastructure in this area and its relative connectivity to the city centre compared to the JCS allocations to the north and east of the city.

4.3 Our proposed response to Stroud is therefore as follows:

- With increasing population growth and the consequent pressure for housing in the Stroud area, the City Council recognizes the need for an increase in the housing delivery target, including the additional need for care home spaces.
- The City Council notes and agrees with the proposed changes to the affordable housing requirements, including the production of an SPD on the subject.
- The City Council accepts the need for an increase in the number of jobs to be planned for, and associated increase in employment land release proposed, given the background population growth and housing delivery targets.
- With regard to the proposed early plan review, the City Council would welcome the opportunity to work closely with Stroud council on the future growth issues of mutual concern, especially those that may arise in the vicinity of the Gloucester southern fringe area at Hunts Grove and Hardwicke.
- The City Council continues to object to the Hunts Grove development, and in this case the proposed increase of 250 dwellings to the Hunts Grove extension (which now comprises a total of 2,500 dwellings). This approach conflicts with the City Plan which seeks to focus growth around the north and east of the Gloucester urban area.
- The City Council continues to object to further major development allocations to the southern fringe of Gloucester. This area is not the most sustainable choice for addressing Stroud's housing needs, rather it contributes more to Gloucester's needs. Hunts Grove has expanded from its initial size of 1,250 dwellings to a proposal of 2,500 dwellings. That brings with it considerable additional demands for physical and social infrastructure. Currently, Hunts Grove residents seek much of their supporting facilities from Quedgeley and this places considerable 'stress' on these facilities. In addition, there is poor public transport accessibility from Hunts Grove and this creates the generation of a considerable amount of private car traffic in the area.
- Notwithstanding the above objection, the City Council would welcome the opportunity to work closely with Stroud on the master planning for the Hunts Grove area to ensure that the appropriate supporting infrastructure and linkages

to the surrounding area are put in place to support the level of growth proposed in the area for the benefit of Gloucester city.

5.0 Asset Based Community Development Considerations

5.1 These have been addressed in paragraph 4.3 of the report.

6.0 Alternative Options Considered

6.1 Not applicable.

7.0 Reasons for Recommendations

7.1 Officers have undertaken a review of the proposed changes to the Stroud District Local Plan and consider that the above responses represent an appropriate and constructive consultation response in order that the Stroud District Local Plan can progress towards soundness and legal compliance at its ongoing examination.

8.0 Future Work and Conclusions

8.1 Stroud district council and the Inspector for the examination of the Stroud District Local Plan will consider the consultation comments received. The Inspector will then be able to reach his conclusions about the legal compliance and soundness of the plan in his final report.

9.0 Financial Implications

9.1 None

10.0 Legal Implications (supplied by One Legal)

10.1 There is an ongoing duty to cooperate with our neighbouring authorities.

11.0 Risk & Opportunity Management Implications

11.1 No negative impacts identified.

12.0 People Impact Assessment (PIA):

12.1 No negative impact identified.

13.0 Other Corporate Implications

Community Safety

13.1 Not applicable.

Sustainability

13.2 As a development plan the Stroud District Local Plan has a legal responsibility to promote and allocate sites in order to deliver sustainable development in Stroud district up to 2031.

Staffing & Trade Union

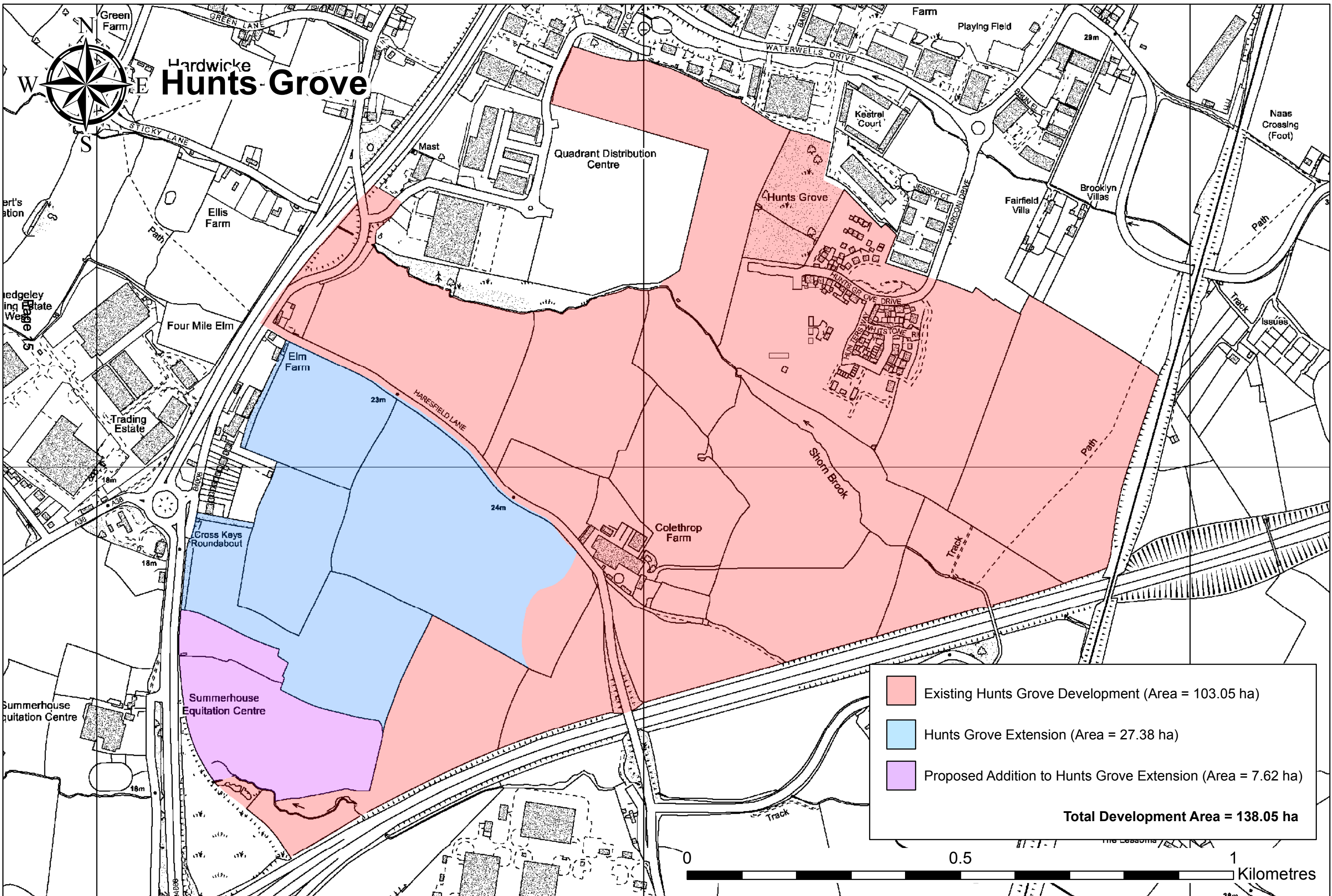
13.3 Not applicable.

Background Documents:

Stroud District Local Plan: Consultation on further post-submission proposed changes (including further potential main modifications)

https://consultation.stroud.gov.uk/planning-strategy/local-plan-further-post-submission-proposed-change/consult_view

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Gloucester City Council

Meeting:	Planning Policy Sub-Committee	Date:	17th September 2015
Subject:	Cheltenham Plan 2011 – 2031 Issues and Options - Public Consultation		
Report Of:	Anthony Wilson, Head of Planning		
Wards Affected:	No		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Philip Bylo, Interim Planning Policy Manager philip.bylo@gloucester.gov.uk 01452 396854		
Appendices:	1 – Letter of Representation to Cheltenham B. C.		

1.0 Purpose of Report

- 1.1 To provide an overview of the key issues officers have identified in relation to the Cheltenham Plan 2011 – 2031 Issues and Options public consultation (June 2015) and endorsement of Appendix 1 as the Council's formal response to this consultation.

2.0 Recommendations

- 2.1 Planning Policy Sub-Committee is asked to **ENDORSE** Appendix 1 as the Council's response to the Cheltenham Plan 2011 – 2031 Issues and Options public consultation (June 2015).

3.0 Background and Key Issues

- 3.1 Cheltenham Borough undertook a scoping consultation on their Local Plan to ascertain and identify key issues for residents and business in the Borough. This took place for an eight week period ending on 2 September 2013. Following on from this, and during the Joint Core Strategy (JCS) examination, which is now underway, the council have published a draft Issues and Options document (June 2015) for a six week period of public consultation.
- 3.2 Once adopted the Cheltenham Plan and JCS, taken together, will comprise the statutory development plan for Cheltenham Borough.

- 3.3 It is the role of the Cheltenham Borough Plan to identify sites for development as well as provide non strategic /more locally specific planning policy for the delivery of all development in the borough. This needs to be fully consistent with the approach taken in the Joint Core Strategy
- 3.4 The response to Cheltenham Borough, attached at Appendix 1, has been prepared in the spirit of co-operation with comments offered in order to help Cheltenham achieve a 'sound' plan that meets legal compliance regulations.
- 3.5 The letter was sent as Gloucester City's interim comments prior to the consultation deadline, subject to its endorsement at this meeting.

4.0 Draft Response

- 4.1 Officers have reviewed the content of the Draft Issues and Options public consultation and are broadly content that it offers a good starting point for plan preparation for the period 2015 – 2031.
- 4.2 However, there are a range of concerns and comments to be made on its contents and these are briefly summarised below;

General comments

- The Plan is being prepared in stages with the consideration of sites for employment and residential allocations and green space designation being considered in the first instance. This approach will need to be carefully progressed to ensure the delivery of a comprehensive well integrated Plan. A timescale for the consideration of the remaining Plan areas would be useful to understand how the plan fits together as a whole.
- There is concern that having taken this approach it will be challenging to comprehensively assess the necessary infrastructure, viability and associated CIL that will be required to support the staged approach to the Plan.
- With respect to the Site Options, there is some uncertainty as to the justification for the site grading's and how this relates back to the SALA, there needs to be more clarity on this and ideally an indication of the potential capacities, and types of development considered appropriate at each site.
- Whilst it is understood that there is the evidence prepared for the Submission Joint Core Strategy (JCS) (Nov 2014) there seems to be little new evidence base (other than the Integrated Sustainability Appraisal and Habitat Regulations Assessment) being considered. The NPPF requires a Local Plan to be based on evidence based assessment including heritage and townscape character analysis; transport – including traffic impact; strategic flood risk; biodiversity; infrastructure and viability. It would be useful to understand when this work is anticipated to ensure delivery of a sound plan.
- The timetable for plan preparation on page 3 of the document is very ambitious and will not allow for the highway implications of the identified sites to be tested on the

updated 2013 Saturn model before preparation of the pre-submission version of the plan.

- The timetable of plan preparation also allows little time for consideration of any implications of the JCS Inspector's report and the impact that this may have for the spatial strategy for the JCS and therefore on the Draft Cheltenham Plan.

Economy

- The 'policy on' approach being taken in the Cheltenham Plan should be reflected within the Joint Core Strategy to ensure conformity between the two Plans is achieved.

Green Spaces

- There needs to be a justified and sound approach to the identification and protection of Local Green Spaces which ensures that the economic aspirations of the Plan are achievable and that the proposals are consistent with those contained within the JCS.
- There also needs to be consideration to integrating green space within the strategic Green Infrastructure opportunities.

Housing

- Further clarification on site capacity is requested.
- Concern is raised that there is no mention of the delivery of affordable housing.
- Attention is drawn to work being undertaken by Cheltenham Borough Homes which may lead to additional sites being identified.

5.0 Asset Based Community Development (ABCD) Considerations

5.1 These have been addressed in Section 4.2 of the report.

6.0 Alternative Options Considered

6.1 Not applicable.

7.0 Reasons for Recommendations

7.1 Officers have undertaken a review of the Draft Issues and Options consultation for the Cheltenham Plan and consider that Appendix 1 represents the most appropriate constructive consultation response offered in order that the iterative Cheltenham Plan process might be found sound on examination.

8.0 Future Work and Conclusions

- 8.1 After consideration of consultation comments, Cheltenham Borough will proceed to the preparation of and consultation on a Pre-Submission plan in Winter 2015 with submission to Secretary of State during Winter / Spring 2016, examination projected to be during Spring 2016 and adoption Summer 2016.
- 8.2 There will be opportunity for members to make further comments on soundness and legal compliance of the Cheltenham Plan at the pre-submission stage should they choose to do so.

9.0 Financial Implications

- 9.1 None

10.0 Legal Implications (supplied by One Legal)

- 10.1 The Cheltenham Plan will need to be in conformity with the requirements of the JCS. The JCS strategic plan has yet to be adopted. The preparation of the Cheltenham Plan should not precede the adoption of the JCS.

11.0 Risk & Opportunity Management Implications

- 11.1 No negative impacts identified.

12.0 People Impact Assessment (PIA):

- 12.1 No negative impact identified.

13.0 Other Corporate Implications

Community Safety

- 13.1 Not applicable.

Sustainability

- 13.2 As a development plan the Cheltenham Plan has a legal responsibility to promote and allocate sites in order to deliver sustainable development in Cheltenham Borough for the period up to 2031.

Staffing & Trade Union

- 13.3 Not applicable.

Background Documents:

Cheltenham Plan 2011-2031 - Draft Issues and Options public consultation (June 2015)
http://www.cheltenham.gov.uk/info/1004/planning_policy/1034/the_cheltenham_plan

Submission Gloucester Cheltenham and Tewkesbury Joint Core Strategy (Nov 2014)
<http://www.gct-jcs.org/Documents/Publications/Submission/JCS-Submission-Version-November-2014a-corrected.pdf>

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14th July 2015

Dear Tracey,

CHELTENHAM PLAN (PART ONE)
ISSUES AND SITE OPTIONS: PUBLIC CONSULTATION

Thank you for consulting Gloucester City Council on the above public consultation. Please note that the response provided represent the views of officers. This response will be going to the next Planning Policy Sub Committee on 18th September 2015 for consideration. An update on the outcome of this will be provided to you following this meeting.

These comments are offered in the spirit of strategic partner joint working in order to ensure that Cheltenham Borough makes good progress towards the preparation of a sound local development plan document.

General comments

- It is noted that this Plan is being prepared in stages with the consideration of sites for employment and residential allocations and green space designation being considered in the first instance. This approach will need to be carefully progressed to ensure the delivery of a comprehensive well integrated Plan. A timescale for the consideration of the remaining Plan areas would be useful to understand how the plan fits together as a whole.
- There is concern that having taken this approach it will be challenging to comprehensively assess the necessary infrastructure, viability and associated CIL that will be required to support the staged approach to the Plan.
- With respect to the Site Options, there is some uncertainty as to the justification for the site grading's and how this relates back to the SALA, there needs to be more clarity on this and ideally an indication of the potential capacities, and types of development considered appropriate at each site.
- It would also be helpful to understand what additional evidence base work is going to be commissioned to support the potential site allocations within the Plan. Whilst it is understood that there is the evidence prepared for the Submission Joint Core Strategy (JCS) (Nov 2014) there seems to be little new evidence base (other than the Integrated Sustainability Appraisal and Habitat Regulations Assessment) being considered. The NPPF requires a Local Plan to be based on evidence based assessment including heritage and townscape character analysis; transport – including traffic impact; strategic flood risk; biodiversity; infrastructure and viability. It would be useful to understand when this work is anticipated to ensure delivery of a sound plan.
- The timetable for plan preparation allows little time for the Transport Modelling of preferred urban sites using the updated 2013 Gloucestershire Highways Saturn Model which should be available to JCS districts for local plan modelling purposes in the autumn of 2015. This evidence is crucial in order to be

able to test the local highway and strategic road network mitigation required from proposed site allocations and therefore the viability of the proposed Cheltenham Plan.

- The timetable also offers little time for consideration of any outcomes from the JCS EiP, which is now timetabled to continue until early 2016. Moreover it would be wise for Cheltenham Borough to take its local plan to examination only when the JCS has been formally adopted, rather than before JCS adoption, in order to take account of any possible emerging changes to strategic development quantum's, or proposed major modifications to JCS strategic policy. It may be helpful to reflect this in future timetable releases.

Economy

- It is encouraging to see that the Cheltenham Plan is based on an economic vision and strategy which is delivering a 'policy on' approach to the economy. With this in mind it will be important that the approach contained within the lower tier plan is fed into the JCS and its evidence base work and that the JCS Inspector is made duly aware of Cheltenham's economic aspirations. This will ensure a coordinated approach is taken between the two plans and that overall development needs are then appropriately assessed to support delivery of the economic ambitions of the Cheltenham Plan.

It is also encouraging to note that Cheltenham Borough Council is looking to work proactively with the Local Economic Partnership and local businesses to deliver the new employment development the town needs. However little mention is made in the consultation document of the role of the University of Gloucestershire to the economy of the town and the potential it represents in terms of research and development within the creative industries to the local economy.

Green Spaces

- Whilst it is fully recognised that key areas of green space should be protected as Local Green Spaces, a balanced, justified and sound approach is needed to ensure that the economic aspirations of the Plan are achievable. It is noted that land within both the Leckhampton and North West Cheltenham JCS Strategic Allocations is proposed as designation for Local Green Space. Attention is drawn to the fact that the quantum of development proposed in the Submitted JCS (November 2014) at each JCS strategic allocation is based on an extensive range of evidence, including landscape, flooding and Green Belt studies. The Local Green Space allocations proposed in these locations, are at odds with the submitted joint core strategy and if taken forward into the Cheltenham Borough Plan would severely limit the development potential of each strategic allocation such that additional urban extensions, over and above those already before the JCS Inspector, would need to be allocated around Cheltenham to meet the housing needs of the Borough.
- There also needs to be consideration to integrating green space within the strategic Green Infrastructure opportunities.

Housing

- With reference to Section 5.2 please ensure that the Cheltenham Plan makes clear that it has maximised urban capacity before relying on the JCS allocations.
- Further clarity on site capacity going forward would be useful. For example, a further study of Green Belt sites around the fringes of the town could identify medium sized sites with potential for allocation for residential purposes that do not harm the five purposes of the Green Belt, but which could contribute to the housing land supply of the Borough. As this work has not yet been undertaken there

appears to be little evidence to substantiate the stance that the sites are currently 'unsuitable for development' (marked red in the consultation).

- There is no mention of the delivery of affordable housing, which is of concern given this is a key housing issue for the Borough, or other specialist housing development to meet the needs of the increasingly elderly population of the Borough or the student population attracted to the town by virtue of the University of Gloucestershire which currently has three campuses in Cheltenham. While the strategic elements of these matters will be considered by the JCS it is for the Cheltenham Plan to deliver such development within its own administrative boundaries.
- It is understood that Cheltenham Borough Homes (CBH) are looking to make the best use of local authority sites across Cheltenham, including the potential redevelopment of garage sites. The City strongly recommends that if these sites have been omitted in this current consultation that they be included in any future SALA review and emerging local plan consultation given their development potential and that CBH are understood to be actively pursuing re-development options within their portfolio that could conveniently contribute to the Borough's five year housing land supply.

I trust these comments, which are offered in the spirit of joint working and co-operation, are useful and will be taken into account in preparing the next stage of the plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wilson', written in a cursive style.

Anthony Wilson
Head of Planning

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