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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
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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