

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
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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>