

# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet Council</b>	<b>Date:</b>	<b>8 November 2023 16 November 2023</b>
<b>Subject:</b>	<b>Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan – Public consultation (Regulation 18)</b>		
<b>Report Of:</b>	<b>Cabinet Member for Planning and Housing Strategy</b>		
<b>Wards Affected:</b>	<b>ALL</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Adam Gooch – Planning Policy Manager</b>		
	<b>Email: adam.gooch@gloucester.gov.uk</b>	<b>Tel: 39- 6836</b>	
<b>Appendices:</b>	<b>1. Draft Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan Consultation Document</b>		

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 To seek approval for public and stakeholder consultation in relation to the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan consultation document (Appendix 1).

### 2.0 Recommendations

- 2.1 Cabinet is asked to **RECOMMEND** to Council that:

- (1) the Strategic and Local Plan Consultation Document (Appendix 1) be approved for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
- (2) authority be delegated to the Head of Place, in consultation with the Cabinet Member for Planning and Housing, to prepare diagrams illustrating the general location of development options for inclusion in the consultation document, and to make any other necessary minor amendments, corrections and additions to the document prior to publication for consultation.

- 2.2 Council is asked to **RESOLVE** that:

- (1) the Strategic and Local Plan Consultation Document (Appendix 1) be approved for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
- (2) authority be delegated to the Head of Place, in consultation with the Cabinet Member for Planning and Housing, to prepare diagrams illustrating the general location of development options for inclusion in the consultation document, and

to make any other necessary minor amendments, corrections and additions to the document prior to publication for consultation.

### **3.0 Background and Key Issues**

- 3.1 In July 2023, the City Council approved a new Local Development Scheme (LDS) for the preparation of a new Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). Around the same time, Cheltenham Borough Council and Tewkesbury Borough Council approved a similar LDS, supporting the progression of the SLP.
- 3.2 The SLP will set out the strategic development strategy; development requirements (for example new homes and jobs); cross-boundary strategic and other policies where there is value in a consistent approach; and 'locality policies', which address issues and opportunities of only local significance.
- 3.3 Once adopted, the SLP will supersede the adopted Joint Core Strategy (JCS), and for Gloucester City Council, the Gloucester City Plan (GCP) and any saved policies from the 1983 Local Plan. Details of the SLP programme are provided at Section 8.
- 3.4 The purpose of this report is to seek approval from Council to hold the first full consultation on the emerging SLP. At this early stage, the purpose of the consultation is to:
  - Introduce the concept of the SLP, the timeframe it should cover and explore the issues the SLP should seek to address.
  - Present and consult on a draft Vision and draft Strategic Objectives, drawing on existing plans and council priorities, strategies and commitments.
  - Explore what will constitute a 'strategic matter' where a single cross-authority policy approach is necessary or desirable, and what are local matters relevant to individual councils or localities only.
  - Consider how the SLP can deliver the legal requirement to adapt and mitigate the implications of climate change, and deliver on the councils' climate change commitments, testing how the statutory development plan can be used to drive change.
  - Consider how much development, such as new homes, retail, employment land and infrastructure, the SLP should plan for.
  - Consider the alternative options for meeting development needs in ways that deliver genuinely sustainable development, drawing on an updated understanding of the capacity of the urban areas to accommodate development on brownfield and other sites in the urban areas.
- 3.5 At this early stage in the process, the statutory purpose of a Regulation 18 consultation is to ask people what they think the Plan should contain and help inform emerging priorities. Accordingly, the consultation document relies on emerging evidence, some of which is new and some updating that of the JCS. Evidence preparation is an ongoing workstream and will be informed by the findings of the Regulation 18 consultation.
- 3.6 Once approved by all three SLP authorities, consultation will commence. This will be undertaken in accordance with each council's adopted Statement of Community Involvement (SCI); Gloucester City Council adopted a new SCI in September 2023.

The consultation last for at least eight weeks and be framed around a series of questions, supported by events and consultation methods appropriate to the scope of the consultation. Comment will be invited from our various communities, the development industry, infrastructure/service providers and others with an interest in growth.

- 3.7 The consultation document will be accompanied by an emerging evidence base. This will include the Housing and Economic Land Availability Assessment (HELAA) which Government requires local planning authorities to maintain. The HELAA is a preliminary assessment, including mapping, of individual sites which have been submitted to the Council, or identified by officers, for consideration as development options. The consultation document itself will include various diagrams derived from the HELAA, illustrating broadly the various potential development locations being promoted to the councils which would be associated with each of the six development scenarios. The graphic design work in drawing up these diagrams is currently underway and will be shared with members prior to the consultation launch. It is important to note, however, that the inclusion of land on any accompanying maps or diagrams does not mean it is to be regarded as suitable or even available for development; nor that it will be supported by the local planning authorities. Decisions on preferred options for any sites and locations will only emerge at later stages in the plan-making process.
- 3.8 The adopted LDS identifies the intended programme for the preparation of the SLP. Following this consultation, focus will turn to the preparation of a Draft Preferred Options SLP. This will include a draft strategy, site allocations and policies, and be published for consultation in early 2025 (also under Regulation 18). To support this stage, it will be necessary to undertake a large amount of evidence to justify the plan and demonstrate its deliverability, including for example detailed transport modelling, an assessment of different site alternatives, and a new assessment of the need for new homes and employment land.
- 3.9 This will be followed by Publication of the Pre-Submission draft SLP (under Regulation 19) in early 2026, followed by Submission to the Secretary of State for independent examination.

#### **4.0 Social Value Considerations**

- 4.1 As the SLP progresses, there is an opportunity to secure social value through development opportunities, for example Employment and Skills Plans. However, at this early stage the focus is on considering the issues the plan should aim to address, with social value considerations further along the plan-making process.

#### **5.0 Environmental Implications**

- 5.1 The SLP will be a plan to meet development needs in a way which achieves sustainable development, including addressing the causes of climate change, mitigating its effects and promoting nature recovery. The SLP will also include policies to safeguard against other environmental effects of development. All local plans are required to be informed throughout their preparation by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment and Equalities Impact Assessment (EqIA). A draft SA report has been prepared to inform this Regulation

18 stage, including evaluating the likely sustainability effects of the draft vision, objectives, and spatial options.

5.2 The emerging Plan is also required to be accompanied by a Habitats Regulations Assessment (HRA) to ensure adverse impacts on international habitats sites are avoided or, where this is not possible, effectively mitigated. A draft HRA has similarly been prepared to inform this Regulation 18 stage.

5.3 Both documents will be available to view on-line. This is an iterative process and future versions will inform decision making on the emerging Plan as the SLP progresses.

## **6.0 Alternative Options Considered**

6.1 This consultation considers different alternatives and invites comment on other alternatives that should be considered through the SLP process.

## **7.0 Reasons for Recommendations**

7.1 The City Council agreed to the preparation of the Cheltenham, Gloucester and Tewkesbury SLP in July 2023. This represents the first full consultation of the SLP under Regulation 18 and is an opportunity for the community and stakeholders to engage early in the process and inform the scope of the Plan.

## **8.0 Future Work and Conclusions**

8.1 Once approved by all three SLP authorities, consultation will commence for a minimum period of six weeks.

8.2 This is the first consultation in relation to the SLP. The programme for preparation of subsequent stages is set out the adopted LDS 2023.

## **9.0 Financial Implications**

9.1 Consultation activities are included within the overall SLP budget.

(Financial Services have been consulted in the preparation of this report.)

## **10.0 Legal Implications**

10.1 In preparing a local plan, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a local planning authority must notify:

- Consultation bodies that may have an interest in the subject of the proposed local plan/as the local planning authority considers appropriate; and
- Such residents and other persons carrying on business in the local planning authority's area which it considers appropriate to invite representations.

of the subject matter of the local plan which it proposes to prepare and invite them to make representations about what a local plan with that subject ought to contain.

- 10.2 The local planning authority must take into account any representations made to them in response to those invitations and may carry out more than one Regulation 18 consultation in preparing a local plan. There is no minimum period for consultation at this stage of the plan making process, as opposed to the Pre-Submission stage which requires a minimum of 6 weeks.
- 10.3 Under section 19(3) of the Planning and Compulsory Purchase Act 2004 in preparing the local plan the authority must also comply with their Statement of Community Involvement.

(One Legal have been consulted in the preparation of this report.)

## **11.0 Risk & Opportunity Management Implications**

- 11.1 The main risk at this stage relates to the Government's proposal for reform to the planning system. However, the scope of the consultation and the questions that are asked will be relevant regardless of any proposed changes to the planning system.
- 11.2 As part of the consultation events will be held at external venues. Risk assessments will be undertaken to ensure the safety of staff and the community.

## **12.0 People Impact Assessment (PIA) and Safeguarding:**

- 12.1 A PIA Screening has also been undertaken, which demonstrates impacts at this stage of the process are neutral.
- 12.2 Furthermore, the SA process (see Section 5) incorporates EqIA. This is a tool that enables the councils to consider the likely impact of the SLP on different groups who share a protected characteristic, as defined by the Equality Act. It is an iterative process and future versions will inform decision making on the emerging Plan as the SLP progresses.

## **13.0 Community Safety Implications**

- 13.1 See Section 11.

## **14.0 Staffing & Trade Union Implications**

- 14.1 None

**Background Documents:** Local Development Scheme (July 2023)