

Update to The Cheltenham Plan 2011- 2031 Duty to Cooperate Statement following the Pre- Submission Consultation

Cheltenham Borough Council
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1. Introduction

- 1.1 As part of the regulation 19, Pre-Submission consultation, Cheltenham Borough Council produced a Duty to Cooperate Statement¹, this document provides an update to that Statement so that the consultation is included.
- 1.2 This update statement should be read in conjunction with the original Statement (January 2018), in order to gain a full picture of the activities undertaken by the Council in order to demonstrate compliance with the Duty to Cooperate.
- 1.3 A separate Statement of Consultation has been prepared which details all consultation activities undertaken in preparation of the Cheltenham Plan. This document should be read alongside the Statement of Consultation.
- 1.4 The Pre-Submission consultation was produced in line with regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012.

National Planning Policy Framework and Guidance

- 1.5 In July 2018 an update to the National Planning Policy Framework was published. In accordance with Annex 1 of the updated document, it is intended that the Cheltenham Plan will be examined against the Framework which was published in 2012 as it is against this version of the framework that the plan has been prepared.
- 1.6 The new Framework will be taken into account when reviewing both the Joint Core Strategy and the Cheltenham Plan.

2. Joint Core Strategy

- 2.1 Following the adoption of the Joint Core Strategy in December 2017, work has begun on the immediate review(s) of the plan relating to housing supply for Gloucester City and Tewkesbury Borough and Retail matters for the JCS area as whole.
- 2.2 An Issues and Options document is expected to be presented to Council's in October 2018 for consultation in November 2018.

Retail Review

- 2.3 A brief of work has been prepared and the tendering process is underway in order to find a suitable consultant to prepare a retail and leisure study to inform the retail review.
- 2.4 Included within the brief a timeline indicates that an inception meeting will take place in October 2018 and evidence preparation and policy drafting will be undertaken up to March 2019.

3. Pre-Submission Consultation

- 3.1 The Pre-Submission consultation on the Cheltenham Plan ran from 12th February until 9th April 2018, and was available to all to make representations on the plan and supporting evidence.

The Joint Core Strategy Authorities

- 3.2 During the Pre-Submission consultation, Cheltenham Borough received one comment from Gloucester City Council which confirmed that the City Council did "not have any specific comments

¹ Available from the consultation homepage:
<http://consult.cheltenham.gov.uk/consult.ti/CheltPlan/consultationHome>

to make”, no response was submitted from Tewkesbury Borough Council. However, joint working between the three authorities continues, through addressing implementation of and reviewing the Joint Core Strategy.

- 3.3 A letter has been prepared, jointly signed on behalf of Gloucester City and Tewkesbury Borough authorities, appended to this report, which shows that the two Councils are supportive of Cheltenham Borough’s position with regards to submission and examination of the Cheltenham and the situation surrounding the five year housing land supply position as explained in the five year housing land supply statement, available from the Council’s website.

Other Gloucestershire Local Authorities

- 3.4 Representations were received from Gloucestershire County Council on a number of matters. As previously explained in the Duty to Cooperate Statement from January 2018, provision of a secondary school on site MD5: Leckhampton is a matter that the County Council and Borough Council have been working closely on.
- 3.5 Through ongoing communications between the two authorities, including representation to the Pre-Submission consultation, Gloucestershire County Council supports the Plan with regards to allocation of land for the siting of a secondary school, in order to meet the identified need expected to arise from September 2019.
- 3.6 Cooperation and engagement will continue between the two authorities on this matter.

4. Prescribed Bodies

- 4.1 All Prescribed Bodies as listed in Appendix two of the Statement of Community Involvement (2014) were informed of the Pre-Submission consultation directly and invited to submit representations as part of the consultation.
- 4.2 Representations were received from a large proportion of the Prescribed Bodies listed, however any issues raised were local in nature and will be addressed accordingly through future stages of the plan development.
- 4.3 The Cotswold Beechwoods Special Area of Conservation (SAC) formed the focus of a ‘Statement of co-operation’ in the JCS between the three local authorities and Natural England. The issues were set out in that document and in subsequent Natural England responses to the local plan documents for Gloucester City, Cheltenham and Tewkesbury. The main issue is that there is a lack of evidence on visitor numbers and impacts on the Beechwoods SAC. Therefore visitor surveys need to be undertaken and appropriate mitigation measures put in place. Stroud District Council (where the SAC is located) has commissioned a visitor survey of the Cotswold Beechwoods SAC and has invited the JCS authorities to collaborate through funding and membership of a working group with Natural England acting as an advisory body.
- 4.4 In the interim an approach to HRA of residential planning applications needs to be agreed. Natural England has offered advice and the JCS authorities have agreed to arrange a meeting with Development Management managers to discuss the approach to HRAs on individual applications.

5. Conclusion

- 5.1 Following the regulation 19, Pre-Submission consultation, Cheltenham Borough are able to demonstrate that the Duty to Cooperate has been met.