

## **Cheltenham Borough Council Local Plan 2011-2031 Examination**

### **Cheltenham Borough Council's further response to initial matters raised by the Inspector**

**14 December November 2018**

Following from the Council's response to your letter of the 31 October 2018 you have raised matters of concern and requested that the Council considers whether it wishes to seek to address the issues prior to the start of any hearings. The Council is already in discussions with the three statutory consultees and agree to undertake the further work and/or propose changes to the Plan in order to address the issues raised by the EA, Natural England and Historic England. The following paragraphs outline the nature of this ongoing cooperation.

#### **Flood risk and sequential test**

Discussions between the Council and the EA have been positive and are ongoing. In response to these discussions the Council has commissioned flood consultants (Capita) to produce the additional evidence which is required by the EA to satisfy their concerns regarding flooding (see Appendix A). We are also continuing to discuss what evidence is required to satisfy the EA's issues regarding waste water.

Due to the limited time available before the hearings the EA have agreed to expedite data sharing procedures. This will allow the consultants to begin work in the first week of January and produce a report before the start of the hearing sessions in February. This will allow the Council and the EA to enter into a Statement of Common Ground.

#### **The Cotswolds Beechwoods SAC**

The Council and Natural England have had several meetings over the past few months. The most recent, on 10 December 2018, was to discuss interim measures to deal with Habitats Regulations Assessments on planning applications whilst the data on the Beechwoods SAC is collected. It was also agreed at this meeting that resolving the lack of evidence at the SAC is a strategic issue and can only be resolved through a policy within the next iteration of the Joint Core Strategy.

The visitor surveys and condition surveys for the SAC have been organised and are due to take place in May 2019. Natural England has been key part of this work so are fully aware that the issue of a lack of data about visitor impact on the SAC is being addressed in the most appropriate way. It would clearly be impractical for the Cheltenham Plan to provide any sort of evidence ahead of the joint work which is already begun.

NE has agreed text for a Statement of Common Ground (Appendix B) which outlines in more detail the ongoing cooperation between all of the Gloucestershire authorities and NE on this issue. The statement also includes a suggestion for an additional policy within the Cheltenham Plan which will provide a safeguarding mechanism to acknowledge the uncertain effects of recreation pressure arising from new housing development in the LPA area.

The Statement of Common Ground also covers the issue of air quality within the SAC. This issue will also be addressed through the JCS but a safeguarding mechanism is recommended within the Cheltenham Plan.

### **Impact on heritage assets**

Discussions between the Council and Historic England (HE) have been continuing. The e-mail trail attached in Appendix C demonstrates the ongoing cooperation. Appendix D illustrates the extra information which the Council has offered HE on a number of the proposed allocation sites. It has been agreed that two sites in particular, Oakhurst Rise (HD4) and Old Gloucester Road (HD8), require additional independent assessment of impact on significance of nearby heritage assets. This work has been commissioned and is expected to be ready by 18 January 2019. The results of this work are expected to form the basis for a Statement of Common Ground between the Council and HE.