

Cheltenham Plan Examination

Matter 1: The evidence base for the submitted Cheltenham Plan and its Vision

Written statement by Cheltenham Borough Council

23rd January 2019

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Main issue: Have the legal requirements for sustainability appraisal (SA), Strategic Environmental Assessment (SEA), and Habitats Regulation Assessment (HRA) been met?

1. Has the SA/SEA undertaken an assessment of reasonable alternatives for locally relevant policies and local (non-strategic) site allocations in the Cheltenham Plan? (ref SD017 Appendix VII)

An Integrated Appraisal (IA) Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including IA Objectives with decision-aiding questions that aim to resolve the issues and problems identified for development planning in the Cheltenham Borough area. This IA Framework, together with the baseline information and Plans and Programmes Review comprises the basis for assessment.

Each developing element of the Cheltenham Plan, including potential site allocations and policies to manage proposed development, has been tested through IA. The likely effects of the emerging Cheltenham Plan were assessed using the IA Framework, the baseline information, and professional judgment.

The Cheltenham Plan is limited with regard to reasonable alternatives – at the strategic level these options have been tested through SA and the development of the JCS that sets out the strategic policies for Cheltenham. At the local level, Issues & Options were considered and the responses received through public consultation informed the preparation of the Preferred Options (October 2016).

Potential site allocation options were investigated, tested through SA and reported in the IA Report (October 2016) that accompanied the Preferred Options Plan on consultation. Thus, relevant alternatives have been considered and tested through the IA process in an iterative and ongoing way such that the findings of the IA have informed the plan-making.

In summary, the answer to this question is ‘yes’, an assessment of reasonable alternatives for policies and site allocations has been undertaken.

2. Is Natural England (NE) satisfied that the proposals in the CP will have no significant effect on any European sites alone or in combination with other development proposals?

NE and the Council produced a Statement of Common Ground (ED010b) which sets out the latest position agreed by both parties in relation to the Cotswold Beechwoods SAC.

The parties agreed that a “specific safeguarding mechanism (e.g. policy) may therefore be needed in order to acknowledge the uncertain effects of recreation pressure arising from new housing development in the LPA area. This approach is needed to meet the Habitats Regulations 2017. The policy should reference:

- The ongoing collaborative approach by the 3 JCS LPAs and Cotswold DC to assist Stroud DC in the delivery of the visitor survey for the Cotswold Beechwoods SAC (thereby updating the evidence base for review of the JCS).
- The need for an interim policy or equivalent safeguarding mechanism to ensure housing development coming forward as part of the CP meets HRA requirements.”

Natural England also proposes that the Cheltenham Plan is amended to include a safeguarding mechanism whereby development proposals in the authority area that may generate traffic along this route take account of the new guidance. This will ensure that development proposals reference the latest available up-to-date information in line with the Habitats Regulations 2017 and consistent with the Wealden Judgement case law dealing with in-combination effects.

The Council understand that, taking the above into account, Natural England are satisfied that the Cheltenham Plan will have no significant effect on any European sites alone or in combination with other development proposals. The Council is willing to discuss the inclusion of these potential policies and is happy to be guided in this by the Inspector.

Main issue: Is the Vision set out as Theme A, B and C positive and justified?

1. Is there a clear Vision for economic development and employment within the CP?

The Council considers that there is a clear vision for economic development for the following reasons. Vision theme B has been included in the Cheltenham Plan through several stages of public consultation and has been refined over time following comments about the proposed wording of the vision. The vision included in the Cheltenham Plan should be read in conjunction with the Joint Core Strategy (JCS), *Ambition 1- A thriving economy* and related strategic objectives, and it is felt that the two together offer a detailed view of how the area could best develop economically, reflecting both the priorities of the Council and local views.

The Council are aware that it could be potentially confusing to include objectives d) and e), which relate more specifically to retail, when retail is no longer being addressed through the Cheltenham Plan but rather the JCS Retail Review. However, retail is an important part of Cheltenham's economy, therefore it is felt that some recognition of that sector is needed, and to have a local (Cheltenham Plan level) objective for that sector gives that recognition and local perspective of the desired outcome.

2. Is the wording of Vision Theme C para 2.9a) appropriate for Cheltenham?

Theme C Objective a) reads "Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas". Given the quality and quantity of Cheltenham's heritage assets it is vital that these are conserved and enhanced wherever possible. The borough's conservation areas play a particularly important part of the council's heritage strategy and deserve recognition in this objective. The mention of conservation areas does not downgrade the importance of any other heritage asset and it is considered to be appropriate for Cheltenham.