

Cheltenham Plan Examination

Matter 7: Natural Environment

Written statement by Cheltenham Borough Council

23rd January 2019

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1. Does the Plan provide sufficient recognition of and protection for important landscapes including the Cotswolds AONB in accordance with national policy in paragraphs 109-116 of the NPPF?

The Cheltenham Plan does not propose to allocate any sites, which have not already been developed, that are located within the Cotswolds AONB or any other important landscape areas. The Cheltenham Plan does not propose any further policies on this matter as the Joint Core Strategy (JCS) gives a strong position on how applications for sites in these sensitive areas should be assessed and decisions made. Policies *SD6: Landscape* and *SD7: Cotswolds Area of Outstanding Natural Beauty* included in the JCS provide protection for sensitive landscapes by specifying what development proposals should do in order to be acceptable and requesting a Landscape and Visual Impact Assessment in support of any planning application. Furthermore Policy SD7 requires that any proposals within the setting of the Cotswolds AONB be consistent with the policies set out in the Cotswolds AONB Management Plan.

It is felt that the policies in the JCS and the Cotswolds AONB Management Plan, when taken together provide sufficient protection for sensitive landscapes, and that any further policies in the Cheltenham Plan would not be able to provide further clarity or guidance than that already given.

For the above reasons, the Plan when taken as a whole does provide sufficient recognition of the landscapes identified in the question.

2. Does the Plan provide sufficient recognition and protection for wildlife and natural features in accordance with national policy in paragraphs 109, 117-120 of the NPPF?

The Council considers that the development plan as a whole provides sufficient recognition and protection for wildlife and natural features for the following reasons.

The Joint Core Strategy and the Cheltenham Plan together have policies covering the concerns raised in the paragraphs mentioned from the NPPF. Policy *SD14: Health and Environmental Quality* aims to “protect and seek to improve environmental quality” from high-quality developments. Specifically the policy states amongst other criteria that “New development must result in no unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values”. The policy also includes a requirement to resolve any risks of land instability, which is directly mentioned in the NPPF.

As part of the plan making process, all sites proposed for allocation in the Cheltenham Plan have been assessed through the Sustainability and integrated appraisals to ensure that no significant adverse impacts that could not be overcome by mitigation measures were present on these sites

that would make development inappropriate or impossible. The Sustainability Appraisal has informed the development of the Cheltenham Plan at each stage of the plan making process. If such an impact had been identified, the site would have been discounted from the Plan.

Furthermore the issue of air pollution/quality has been covered in the Statement of Common Ground which Cheltenham Borough Council has signed with Natural England.