

# Cheltenham Borough Council

Local Plan 2011-2031

## EXAMINATION

[www.cheltenham.gov.uk/LPexamination](http://www.cheltenham.gov.uk/LPexamination)

### ED022 - Comments received on the draft policies document agreed between the Council and Natural England submitted in relation to Matter 1:

#### M1-1284 CBC & NE SoCG

Representor	Comment received
Gloucestershire County Council	<p>Thank you for making Gloucestershire County Council aware of the draft policies document agreed between the Council and Natural England. Through the preparation of the Cheltenham Plan we made observations on Habitats Regulations Assessment (HRA) matters. I would therefore like to pass on the following supportive statement to the Inspector. One minor edit to the proposed air quality policy BG2 is suggested within this.</p> <p><i>“Policy BG1 as set out in the draft policies document agreed between the Council and Natural England can be supported by Gloucestershire County Council. As a strategic planning and highway authority we wish to see housing permitted by District Planning Authorities having no additional significant adverse effect on the Cotswold Beechwoods SAC. Other District Planning Authorities in Gloucestershire also need to consider potential recreational impacts from new development on the Severn Estuary European Marine Site. Such matters have already been addressed by Stroud District Council and this is continuing in the review of their Local Plan. The Forest of Dean District Council are similarly focused. The topic has been grasped by Cotswold District Council too but within their District there is a much smaller quantum of new housing proposed in the vicinity of European Sites. It is appropriate that the construction of a mitigation strategy, informed by visitor surveys, is used to manage recreational activity emanating from new housing developments in Cheltenham Borough. The approach being set out for incorporation into Cheltenham’s Plan is a good one for European Sites that should be echoed closely in the review of other Local Plans in the coming years.</i></p> <p><i>Policy BG2 on air quality is connected to new housing but also applies to all types of development that are likely to generate a significant increase in traffic. Highlighting the recent Natural England guidance, based on the Wealden judgement, is welcomed. However the insertion of the word ‘additional’ between ‘generate’ and ‘road’ would be wise as a clarification. This is because some road and transport schemes have potential to reduce levels of congestion and bring about air quality improvements.”</i></p> <p>I do not propose to attend the Matter 7 (Natural environment) hearing session on Thu 28 February 2019 as the above comments should be self explanatory and I have no further details on these matters to offer you.</p>
Charlton Kings Parish Council	<p>Thank you for the opportunity to submit comments on this draft policy. All this proposed policy does, is to unequivocally demonstrate that Natural England is now so fundamentally under-resourced, that its planning advice on strategic planning issues is entirely without merit and bears absolutely no relationship to the essential conservation issues that relate to Cheltenham. No one with any knowledge of the local area would consider that this Special Area</p>

	<p>of Conservation had anything whatsoever to do with Cheltenham, and was derived, by someone with no local knowledge or understanding, solely from a search of the top-tier conservation designation in the general area; as this weblink demonstrates.  <a href="https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sacIndex&amp;query=Ref_CODE%3D%27UK0013658%27">https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sacIndex&amp;query=Ref_CODE%3D%27UK0013658%27</a></p> <p>There are two nationally important conservation sites, notified as Sites of Special Scientific Interest, lying wholly or partly within Cheltenham; Leckhampton Hill and Charlton Kings Common; and Lineover Woods.  <a href="https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sssiIndex&amp;query=HYPERLINK%3D%271001777%27">https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sssiIndex&amp;query=HYPERLINK%3D%271001777%27</a></p> <p>Additionally, there are numerous Key Wildlife Sites in Cheltenham that are vitally important in a local context, but which Natural England's current processes are utterly unable to pick up and draw to the Inspector's attention  <a href="https://www.gloucestershirewildlifetrust.co.uk/wildlife/key-wildlife-sites">https://www.gloucestershirewildlifetrust.co.uk/wildlife/key-wildlife-sites</a></p> <p>Sadly, in our view, the Inspector should simply disregard the evidence submitted by Natural England and seek more locally sourced advice, either from Gloucestershire Wildlife Trust or, even, from this Council.</p> <p>This draft policy is entirely irrelevant in the context of the Cheltenham Local Plan and should be replaced with a properly considered policy that has some bearing on the future conservation of Cheltenham's natural environment.</p>
Rosemary Bubb	<p>Thank you for allowing me to comment on this document.</p> <p>I would like to comment as follows:</p> <p>I did not find the document easy to read as so many parts of words are missing - it appears instances of (for example) 'ti' and 'ffi' have been simply omitted, so sometimes I am not clear what word was actually supposed to be used. I feel this is poor, and is likely to discourage readers to comment further.</p> <p>Policy BG1 provisions are not strong enough. In the 4th paragraph, I feel '<b>may</b> include requiring housing developments to make contributions...' should be '<b>will</b> include requiring housing developments to make contributions...'. Developers should take their share of responsibility for habitat management. Green space could always be accommodated within developments if the developer gave it priority, so I suggest this is changed to 'Development sites must incorporate suitable open and green space.'</p> <p>Policy BG2 is conditional upon a value judgement of whether the development is likely to affect the Cotswold Beechwoods SAC. I suggest that <b>all</b> developments should be screened.</p>