

**Appendix 2:** Comments made on behalf of Cheltenham Borough Council in response to Stroud District Core Strategy – Towards a Preferred Strategy

<b>Reference in Stroud Local Plan – Towards a Preferred Strategy</b>	<b>Cheltenham Borough Council Comments</b>
<p>General – Duty to Co-operate</p>	<p>The housing figures for Stroud have been derived from the Department of Communities and Local Government (DCLG) household projections (November 2010) and a conversion factor applied to determine a dwelling requirement. It should be noted that many of these homes have been built or have existing planning permissions and as such the resultant housing requirement is set at 3,200 dwellings. It should be noted that alongside DCLG projections a local demographic evidence base prepared by Gloucestershire County Council is available; this takes account of data available which reflects trends at the County level. It is not clear from the draft plan why one source of projections have been used instead of another. The JCS authorities are using the projections prepared by Gloucestershire County Council as the baseline for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.</p> <p>It is not clearly demonstrated within the Stroud Core Strategy, how the duty to co-operate, set out in the Localism Act, has been undertaken. With particular reference to Gloucester City, no clear attempt has been made to assist in meeting Gloucester’s unmet housing need as identified via the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy within Stroud District. The evidence that cross boundary issues have been explored is not referenced.</p> <p>Whilst Gloucester is working on a Joint Core Strategy with Cheltenham and Tewkesbury Boroughs, it does not necessarily follow that the level of housing required to meet the demographic need of Gloucester should be solely provided for within the Joint Core Strategy area. The duty to cooperate extends to all authorities and the relationship of Gloucester’s urban area to Stroud District should not be overlooked in this instance. Any expansion of Gloucester to the south should be as part of a coordinated approach by Gloucester City and Stroud District Councils, especially where development would be primarily meeting the housing needs of Gloucester rather than Stroud.</p> <p>In meeting the unmet housing need for Gloucester, which requires land to be found in other authority areas, the potential to use land which is not within the Green Belt should be recognised as</p>

	an opportunity to reduce pressure on this area.
General – South of Gloucester	<p>It is noted that Gloucester City Council object to any further development to the South of the City.</p> <p>It is considered that any development on land at Hardwicke, Whaddon and Upton St Leonards would form part of the urban area of Gloucester and has a close functional relationship with the City. This land should not be considered through a dispersal or rural settlement approach, but if brought forward should provide for planned urban extension to Gloucester building on the facilities and employment opportunities available therein.</p> <p>Increases in development in this area will impact on the infrastructure, services and facilities of existing settlements and needs to be clearly addressed by the strategy. Potentially development could take place in the settlements of Hardwicke, Haresfield and Upton St Leonards, which look to Gloucester City and Brockworth for their services and facilities.</p>
General – Hunts Grove	The land at Hunts Grove remains a preferred location for accommodating development to the South of Gloucester, providing for the housing needs of Gloucester. This development should be identified through the development plan process and any allocation would need to be as a result of agreement between Gloucester and Stroud Councils within the context of the Localism Act and the duty to co-operate.
General – Housing and employment	Given that locations to the south of Gloucester will primarily look to Gloucester and Brockworth for its employment it is not clear how this inter-relationship has been taken into account. Any employment provision must be complimentary to existing employment uses at Gloucester/Brockworth. This needs further consideration.