

Appendix 3: Frequently Asked Questions (FAQs) relating to the Cheltenham, Tewkesbury and Gloucester Strategic and Local Plan (CGTSLP)

Background

The Joint Core Strategy (JCS) sets out strategic policies for meeting future development needs across Cheltenham, Tewkesbury and Gloucester up to 2031 i.e. it identifies overall housing and economic needs and allocates sites for the very largest future developments.

The councils have also adopted non-strategic policies and allocations in separate district-level local plans. Cheltenham's Local Plan is ready for review whilst Gloucester and Tewkesbury's plans were both adopted within or just over the last 12 months.

The JCS is now five years old and new strategic policies are needed to manage development needs up to 2041 and beyond. Formal revisions to the three authorities' Local Development Schemes (LDSs), setting out the programme for plan preparation are programmed for adoption in the summer of 2023.

In this context, careful consideration has been given to how plan making for the three areas can most effectively be rolled forward, in the context of delivering sound, resilient and efficient plan making.

The LDS presents a combined Development Plan Document (DPD). The reasons for preferring this approach are set out in the form of FAQs below:

What are the advantage of the combined DPD?

There are substantial benefits, principally:

- Government places a legal obligation for co-ordination of local plans across administrative boundaries through the "Duty to Co-operate". It is also likely that some form of co-ordination will be retained under future planning reforms with the proposed "Alignment Test". The geography of our three councils is such that there are very strong inter-relationships and dependencies in housing, employment, infrastructure and transport patterns. This combined approach would continue to greatly simplify the duties around cross-boundary co-ordination, both within the Gloucester-Cheltenham-Tewkesbury area and beyond (e.g. with Stroud, Cotswold and the Forest of Dean councils).
- Co-ordination with Gloucestershire County Council as strategic planning, highway and education, etc. authority would be embedded through the combined DPD.
- Engagement with national bodies such as the Environment Agency, Homes England and National Highways can most effectively be achieved through working on a combined DPD.

- Local plans are required to be justified with robust evidence base around areas such as housing and employment needs, land availability, transport impacts, flood risk, Green Infrastructure, Biodiversity Net Gain, renewable energy and Green Belt. A combined DPD means we can co-ordinate the collection of evidence base and ensure it is consistent across the area, as well as achieving cost savings.
- A combined DPD would require just one Public Examination, rather than three if separate plans were to be prepared (or four if a one strategic and three separate district plans were prepared). This should also achieve significant cost savings.

What are the alternatives?

We could prepare one Strategic Plan (covering the three Councils) and continue to draw up local policies plans individually. However, as noted above, there are distinct advantages in holding a single plan examination rather than four. There are also considerable benefits in terms of staff efficiencies and resilience in working together on a combined DPD, alongside bringing plan making into a single timescale. There are also substantial risks that one or more individual plans could become delayed, which in turn could delay future reviews of one strategic plan.

Whilst other local planning authorities have gone down different routes, i.e. the Partnership for South Hampshire (PfSH) in terms of certain aspects of work, including housing; energy and green environment and cultural and creative industry initiatives, this does not have the substantial benefits of producing a combined DPD as set out above. Alternatively, we could prepare entirely discrete local plans. However, we would still need to discharge the Duty to Co-operate and inevitably would need to commission an evidence base that straddles the three council areas.

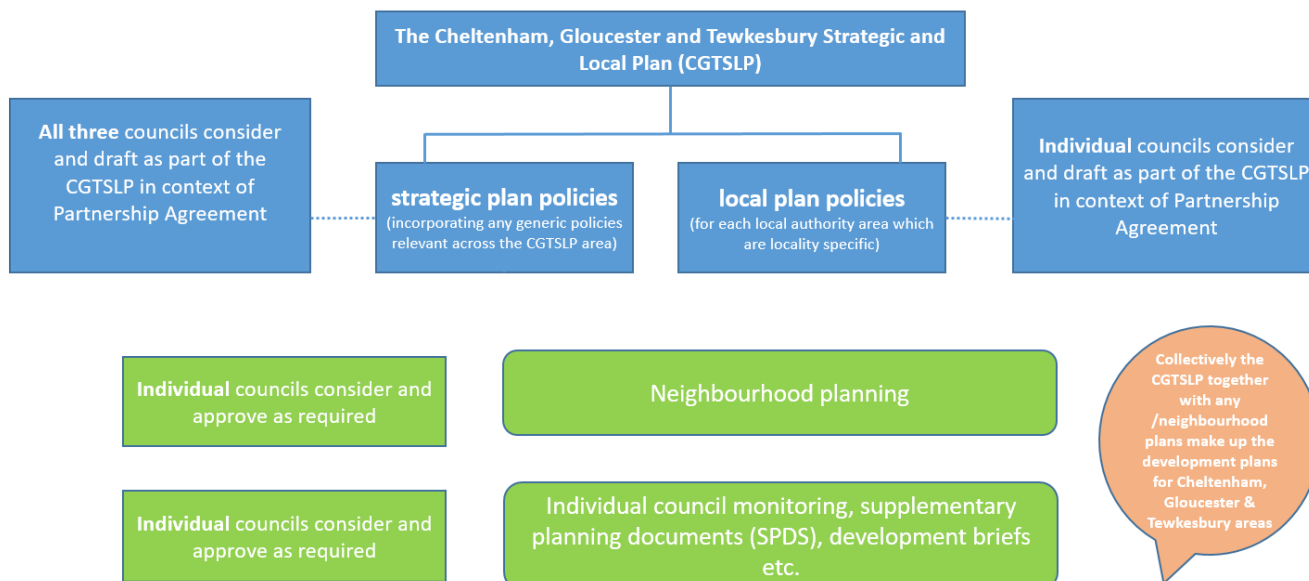
How can the distinct development needs and environmental priorities of each of the three areas be reflected in a combined DPD?

Whilst a combined DPD would be prepared and examined, there would remain considerable scope for individual districts to draft their own local plan policies according to their own characteristics and needs and which would otherwise be set out in district local plans.

How could my Authority be sure our own priorities would not get lost in a combined DPD, or decisions vetoed by another Authority?

The working arrangements will be set out in a formal Partnership Agreement to be signed by all three Authorities and Gloucestershire County Council. This would include a clear protocol that individual districts would not seek to fetter the discretion of the other district authorities in the drafting of the local plan policies. This can be best demonstrated in the diagram below:

The Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (CGTSLP)



Would it be cheaper for my Authority simply to produce its own Plan?

No, the need for a robust and coordinated evidence base would remain but would be more complicated to assemble. Equally the Duty to Co-operate would be more complex to discharge and cost savings associated with combined working would not be achieved. It is estimated that if four Plans were produced (one strategic and three separate district plans), the total cost (including staffing) could be in the order of £17 million. Conversely, for a combined DPD to be produced, the costs (including staffing) are estimated to be around £8 million.

The Planning Practice Guidance (PPG) sets out some of the benefits in producing a combined DPD, including that this can offer a more strategic framework across a larger geographical area, as well as sharing specialist resources and reducing costs such as sharing evidence base work or examination costs.