

**Cheltenham Borough Council**  
**Cabinet – 18 June 2013**  
**Cheltenham Plan – Regulation 18 Scope Consultation**  
**Report of Leader**

<b>Accountable member</b>	<b>Councillor Jordan - Leader Cheltenham Borough Council</b>
<b>Accountable officer</b>	<b>Tracey Crews – Head of Planning</b>
<b>Ward(s) affected</b>	<b>ALL</b>
<b>Key Decision</b>	<b>Yes</b>
<b>Executive summary</b>	<p>The Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury (“the JCS”) will set out strategic planning policies and proposals for the area to 2031. To complete the Local plan it will be necessary for each of the constituent councils to prepare local-level plans that will take forward those strategic proposals in greater detail - put flesh on the bones as it were - whilst also addressing non-strategic planning issues of relevance to the locality.</p> <p>The Cheltenham Borough Local Plan was adopted in 2006 and, having regard to the emerging JCS and the National Planning Policy Framework (NPPF), it is increasingly out of date. In a plan-led system, an out-of-date development plan diminishes the council’s ability to direct and manage development. For these reasons the council needs to begin preparation of the Cheltenham Plan.</p> <p>Plan preparation is a statutory process. In accordance with regulations, the first step is to prepare and consult publicly upon the scope of the proposed plan. In other words: which planning matters should be covered in the plan. That is the purpose of this report and the accompanying consultation document.</p>
<b>Recommendations</b>	<p><b>That Cabinet has considered the Cheltenham Plan Scope consultation document and approved it for public consultation</b></p> <p><b>That Cabinet allows for any minor amendments to the document prior to consultation to be agreed by the Head of Planning</b></p>
<b>Financial implications</b>	<p>There are no financial implications.</p> <p><b>Contact officer: Paul Jones – head of Finance,  paul.jones@cheltenham.gov.uk, 01242 775154</b></p>

<b>Legal implications</b>	The Council is required to have an up to date development plan for its area and must prepare it in accordance with legislative requirements, including ensuring the compliance with the Statement of Community Involvement.  <b>Contact officer:       cheryl.lester@tewkesbury.gov.uk</b>  <b>01684 272013</b>
<b>HR implications (including learning and organisational development)</b>	There are no HR implications  <b>Contact officer: Julie McCarthy, HR Manager (West), Julie.mccarthy @cheltenham.gov.uk, 01242 26 4355</b>
<b>Key risks</b>	Corporate risk CR81: If the Council does not progress as quickly as possible to preparing the Cheltenham Plan, then the Borough will be exposed to the risk of inappropriate development.
<b>Corporate and community plan Implications</b>	Corporate Action ENV 6: We will commence preparation of a Cheltenham Plan.  Progressing with this stage of consultation will allow the Cheltenham Plan to progress in accordance with its timescales.
<b>Environmental and climate change implications</b>	This is an early stage of the Cheltenham Plan which does not set any policy or strategy and therefore implications are limited. However, there may be implications for future versions of the Cheltenham Plan as policies in the Plan may address environmental issues and climate change.
<b>Property/Asset Implications</b>	Not applicable within the context of this report, however at the next stage of plan making property/asset implications may emerge

## Background

- 1.1** It is a statutory requirement to prepare a Local Plan for an area. Whilst the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) will provide the strategic planning framework for the Borough, a new Cheltenham Plan is required to guide development at a local, non-strategic level.
- 1.2** The Localism Act and the National Planning Policy Framework (NPPF) have brought about major changes to the planning system and reintroduce the term 'Local Plan' for the suite of planning policy documents to replace the previously used term 'Local Development Framework'. The NPPF states that each Local Planning Authority (LPA) should produce a Local Plan for its area, based upon and reflecting, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied. Cheltenham's Local Plan will contain at least two policy documents: the strategic JCS and the local Cheltenham Plan, see Appendix 2 for an explanatory diagram.
- 1.3** The amount of weight that can be attributed to the existing Cheltenham Borough Local Plan Adopted 2006 (saved policies) and associated Supplementary Planning Guidance (SPGs)/Supplementary Planning Documents (SPDs) and Development Briefs varies and, in the most part, will diminish over time as the plan was prepared under old planning legislation. Cheltenham Borough is not unique in its position, around half of the councils in

England have Development Plans which predate the most recent planning legislation and as at March 2013 fewer than 7% of councils had adopted plans that have been judged by inspectors to fully comply with the government's NPPF. However, in order to ensure that development within Cheltenham is 'plan-led' rather than 'appeal-led', it is essential to produce a new, up to date; NPPF compliant plan based on objectively assessed evidence within the context of the JCS as quickly as possible.

- 1.4** The Cheltenham Plan will replace the need for the Site Allocations DPD and Development Management Policies DPD which were previously included within the Local Development Scheme and would have covered the same topics.
- 1.5** The Cheltenham Plan will be expected to help deliver the vision, aims and objectives of Cheltenham's Strategic Partnership, Corporate Strategy and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). It will provide the long term borough wide development plan over a 15- 20 year period, and will set out local policies and non-strategic, smaller allocations which will guide development management. This will include policies on scale of development, design, conservation, local infrastructure and deliverability.
- 1.6** The Cheltenham Plan will be informed by the broader strategic planning framework, including
- The Planning and Compulsory Purchase Act 2005 (as amended)
  - The Localism Act 2011
  - Town and Country Planning (Local Planning) (England) Regulations 2012
  - National Planning Policy Framework (NPPF)
  - Emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy
  - Existing Cheltenham Borough Council policies and strategies, where still relevant
  - Existing Evidence Base, where still relevant
  - Internal and external consultation
- 1.7** The proposed Cheltenham Plan Scope consultation is the first stage in preparing the Cheltenham Plan and is a statutory requirement under the Town and Country Planning (Local Planning) (England) Regulations 2012. The Regulations require Local Authorities to consult with people as to what the Cheltenham plan ought to contain. The scope consultation comprises of a relatively short document setting out the topic areas which the Cheltenham Plan will contain with a brief explanation, and early thoughts on a new vision and objectives for the borough, which the public and stakeholders will be asked to comment on.
- 1.8** It is important to remember that, at this stage, the detail is not the main focus of consideration, for example the Scope will include the types of policies to be covered but not the specific wording of the policies, more detailed consultation opportunities will be available later. That said we will also be looking for initial views as to the vision and objectives to help inform preparation.
- 1.9** Cheltenham's Local Plan will initially comprise two documents - the Joint Core Strategy and the Cheltenham Plan – together with any supporting documents, please see Appendix 2 for a diagram. An initial timetable for the production of the Cheltenham Plan is included at Appendix 3 and below:

Consultation on Scope of Cheltenham Plan	Summer 2013
Consult on draft Cheltenham Plan	Spring 2014
Consult on proposed submission Plan	Winter 2014
Submission and examination of Plan	Winter/Spring 2015
Adoption	Summer/Autumn 2015

## **2. Reasons for recommendations**

2.1 It is a requirement to have a Local Plan in place for the Borough. The Cheltenham Plan, in conjunction with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, will enable the council to fulfil this requirement. Approving this first stage document for consultation will allow the progression of the Cheltenham Plan.

### 3. Alternative options considered

3.1 This stage of consultation is a statutory requirement and therefore there are limited alternative options.

3.2 One option that was considered was to go to public consultation without asking for views on the vision and objectives for Cheltenham, however it was felt that the opportunity to gauge public and stakeholder opinion early on in the process, on such an important matter, was one that should not be missed.

### 4. Consultation and feedback

4.1 Internal consultation has been held on the draft scope, visioning and objectives of the Cheltenham Plan with members and officers. This includes

- Planning and Liaison Scrutiny Task Group – A cross party group with a remit *to consider and advise on the emerging Cheltenham Plan and provide guidance and feedback to Planning Committee, Cabinet and Council as appropriate*. The Task group has had a number of opportunities to comment on the working drafts in addition to a full member session held in January 2013.
- Internal officer working group - made up of officers from across the council with a remit *to work with, consider, advise and inform the emerging Cheltenham Plan and request information from, and provide feedback to, individual teams as appropriate*. This group has had the opportunity to feed into the draft scope, visioning and objectives exercise.
- The Cheltenham Partnership – regular updates and discussions with officers leading preparation of the Cheltenham Plan

Feedback from the above groups has been considered and incorporated where appropriate.

4.2 The formal stage of consultation must follow the regulations and consultation on the draft Scope of the Cheltenham Plan will be in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Members of the public and organisations will be given a period of 8 weeks to comment on the document. Comments will be invited from all contacts on our Planning database and copies of the document will be made available (in paper format) at the Council's deposit locations and electronically via the Council's website. Every effort will be made to make the public aware of the consultation through media releases, engagement with C5 group, via council networks to alert groups to help cascade information, leafleting etc. Given the very early, non-specific, nature of the Scope document it is not intended to hold public consultation events, this will occur during the later stages of consultation.

### 5. Performance management –monitoring and review

5.1 This is not a policy document in itself, it merely asks what should be in the Cheltenham Plan and as such will not be monitored, however the responses will be used to inform the production of the Cheltenham Plan.

5.2 The Council will regularly monitor the effectiveness of the Cheltenham Plan in the planning process and use the results to review policies and practices. If necessary, the Council will review the Cheltenham Plan.

<b>Report author</b>	<b>Contact officer Claire Cullen-Jones/David Halkyard</b> <a href="mailto:claire.cullen-jones@cheltenham.gov.uk">claire.cullen-jones@cheltenham.gov.uk</a> <a href="mailto:David.halkyard@cheltenham.gov.uk">David.halkyard@cheltenham.gov.uk</a> <b>01242 264235/01242 774988</b>
<b>Appendices</b>	<ol style="list-style-type: none"> <li>1. Risk Assessment</li> <li>2. Diagram showing Cheltenham's Local Plan and supporting documents</li> <li>3. Cheltenham Plan draft timetable</li> <li>4. Draft Cheltenham Scope Consultation paper</li> </ol>
<b>Background information</b>	<ol style="list-style-type: none"> <li>1. Town and Country Planning (Local Planning) (England) Regulations 2012.</li> <li>2. Planning and Compulsory Purchase Act 2004 (as amended)</li> <li>3. Cheltenham Borough Local Development Scheme  <a href="http://www.cheltenham.gov.uk/site/scripts/download_info.php?fileID=3268">http://www.cheltenham.gov.uk/site/scripts/download_info.php?fileID=3268</a> </li> </ol>

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
CR81	Corporate risk: If the Council does not progress as quickly as possible to preparing the Cheltenham Plan, then the Borough will be exposed to the risk of inappropriate development.	Mike Redman	21.03.13	3	4	12	Reduce	Set up Scrutiny Task Group to advise and challenge on the development of a Cheltenham Plan		Tracey Crews	Corporate
<p><b>Explanatory notes</b></p> <p><b>Impact</b> – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)</p> <p><b>Likelihood</b> – how likely is it that the risk will occur on a scale of 1-6 (1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)</p> <p><b>Control</b> - Either: Reduce / Accept / Transfer to 3rd party / Close</p>											

Diagram showing Cheltenham's Local Plan structure and supporting documents

### Cheltenham's Local Plan and supporting documents



Cheltenham Plan draft timetable

Appendix 3

<b>Cheltenham Plan draft timetable</b>	<b>2012</b>			<b>2013</b>												<b>2014</b>												<b>2015</b>												
<b>Task</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>	<b>J</b>	<b>A</b>	<b>S</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>	<b>J</b>	<b>A</b>	<b>S</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>	<b>J</b>	<b>A</b>					
Agree Scope & Vision of Cheltenham Plan																																								
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Evidence Base Review																																								
Prepare Cheltenham Plan																																								
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v4. 29.05.13



## The Cheltenham Plan

A public consultation on the scope of the plan in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

### Introduction

- 1.0 *What is the “Cheltenham Plan”, what is it for and why is the council preparing it now?*
- 1.1 The Cheltenham Plan will help to guide development of the borough over the next 15-20 years. It will be used in making decisions on planning applications and will be a key part of “place-shaping” Cheltenham. Planning is often as much about what doesn’t get built as what does. And it’s also about making sure we stay competitive, inclusive and sustainable in economic, environmental and social terms. It’s important therefore that we try to get the balance right between what can often seem to be conflicting or competing objectives. That’s a core function of our development plan.
- 1.2 The council is very keen to bring forward the Cheltenham Plan as soon as possible. One reason for this is that the amount of weight that can be attributed to Cheltenham Borough Local Plan Adopted 2006 (saved policies) and associated Supplementary Planning Guidance (SPG’s)/Supplementary Planning Documents (SPD’s) and Development Briefs varies and, in the most part, will diminish over time. It is therefore essential to produce a new, up to date, NPPF compliant plan based on objectively assessed evidence to ensure that development within Cheltenham is ‘plan-led’ rather than ‘appeal-led’.
- 2.0 ***The council is also involved with Tewkesbury and Gloucester in preparing the Joint Core Strategy – how does that relate to the Cheltenham Plan?***
- 2.1 The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) deals with strategic-level planning. For example, the JCS will set out how many houses and jobs need to be provided in Cheltenham over the next 15 - 20 years, identify locations for major development e.g. for development of sites over 450 new homes, to meet that need and set out how and when development will be delivered, including any major infrastructure requirements. See JCS website for more information <http://www.gct-jcs.org/>
- 2.2 Whilst the Cheltenham Plan will complement the JCS by effectively “filling in the details”, it will also be a more locally-focused document dealing with Cheltenham-specific issues such as supporting the work of the Cheltenham

Development Task Force and protecting and conserving the town's built heritage and recognising the importance of our parks and gardens .

### **3.0 What is meant by the “scope” of the plan and why is the council consulting me on it?**

- 3.1 The scope of the plan essentially means the planning matters it will cover – housing, jobs and transport for instance. More detail on this is provided below. The council is consulting you on this not only because it is legally required to but because it wants to ensure that the people of Cheltenham have a say in what's in their development plan.
- 3.2 It's important to bear in mind though that because this is a development plan it has a very specific remit. In other parts of this note we discuss what issues the plan can (and can't) address, and explain some of the reasons for that.

### **4.0 How can I get involved and how will my views be taken into account?**

- 4.1 Later on at section 11 we set out some contact details and related information for you. There's a response form you can fill out – you can tear that off, fill it out and send it in or, if you prefer, there's an online version you can complete *hyperlink to be inserted*. Your views will be taken into account in preparation of the next stage of the plan and your responses, in full or in summary, will be reported to the council as well as being published on the council's website. Planning officers are here to help and they're available during normal office hours to answer any questions you might have about making your views known.

### **The Cheltenham Plan – legal context and “material planning considerations”**

- 5.0 Preparation of a development plan is a “statutory process” governed by legislation<sup>1</sup>. Consultation on the Cheltenham Plan must accord fully with legislative requirements. These include rules about:
- consulting on the scope of the plan;
  - publishing the plan;
  - consideration of representations; and
  - independent examination of the submitted plan by a Planning Inspector.
- 5.1 The “material planning considerations” that have to be taken into account in preparing a development plan are numerous. “Material” in this context just means that an issue is (a) relevant to planning and (b) is not trivial or inconsequential. Localism is a significant material consideration as is the national planning policy framework and particularly paragraphs 150 -185

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<sup>1</sup> Principal legislation is the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012

which deal specifically with plan-making. These paragraphs include guidance on a range of issues that we will return to several times over the coming months such as:

- using a proportionate evidence base in relation to housing, business, infrastructure, the environment and many other areas;
- ensuring viability and deliverability;
- ensuring that the plan is “positively prepared; justified; effective and consistent with national policy” and otherwise sound.

### **The Cheltenham Plan – process, timetable and key consultation stages**

6.0 The diagram overleaf outlines the main stages the plan needs to pass through together with a draft timetable.

Do you have any views on that? Let us know. Need to remember that this is a statutory process as discussed above, so it's not easy to cut corners to save time.

<b>Cheltenham Plan draft timetable</b>	<b>2012</b>			<b>2013</b>												<b>2014</b>												<b>2</b>										
<b>Task</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>	<b>J</b>	<b>A</b>	<b>S</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>	<b>J</b>	<b>A</b>	<b>S</b>	<b>O</b>	<b>N</b>	<b>D</b>	<b>J</b>	<b>F</b>	<b>M</b>	<b>A</b>	<b>M</b>	<b>J</b>					
Agree Scope & Vision of Cheltenham Plan	■	■	■	■	■	■	■																															
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Review of Existing Local Plan	■	■	■	■	■	■	■	■	■																													
Evidence Base Review	■	■	■	■	■	■	■	■	■																													
Prepare Cheltenham Plan										■	■	■	■	■	■	■																						
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## The Cheltenham Plan – Vision and Objectives

- 7.0 The Plan needs to have a Vision and set of objectives to act as a foundation for its policies and proposals. At present there are two existing vision statements that will need to be taken into account in preparing a Vision for the Cheltenham Plan.
- 7.1 The council shares its “corporate” vision for 2010 – 2015 with that of “Our Future, Our Choice: Cheltenham’s Sustainable Community Strategy”:  
*We want Cheltenham to deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations*
- 7.2 The JCS vision is:  
*Our vision is to produce a strategy which fosters growth in the local economy and provides sufficient homes, including affordable homes, in sustainable locations, without increasing the risk of flooding, or harming high quality landscape, whilst maintaining and enhancing the separate vitality, identity and character of individual settlements.*
- 7.3 As a development plan affecting the town the JCS vision obviously is the most directly relevant to the Cheltenham Plan. Whilst it will not be acceptable for the Cheltenham Plan to contradict the JCS in terms of its vision, objectives, policies or proposals, it is right that the Cheltenham Plan vision reflects more local planning issues and concerns. So we need to strike a balance between, on one hand, conforming with the JCS Vision and, on the other, ensuring that our plan Vision is more than just an off-the-peg set of platitudes that could apply anywhere in the country.

Getting the balance right between strategic and local is quite difficult....! How do you think we should approach it?

- 7.4 Some councillors from each political group represented on the council have formed a Working Group to guide preparation of the plan. The Group is considering these visions and will be keen to hear your views on which elements, if any, we should incorporate into a vision for the Cheltenham Plan.
- 7.5 We’re also beginning to think about whether a vision might be better represented by taking a “themed” approach rather than having an all-encompassing (and perhaps rather bland) statement that is perhaps overambitious in its aspirations. If we focused on three or four key themes each supported by a set of delivery objectives, would that be more realistic? For example, one theme might be something like “increase opportunities for local jobs by seeking to attract a broader range of employers into Cheltenham”. The delivery objectives would perhaps include things like having an up-to-date economic strategy accompanied by an “offer” of sites tailored to delivering the outcomes of that strategy that could be allocated in the Cheltenham Plan.

Let us know what you think about the idea of a “themed” Vision and about *your* Vision for the future of Cheltenham.

- 7.5 Whether it’s in the form of an all-encompassing statement or a set of interrelated themes, a Vision alone is not enough. We need to “unpack” that Vision and decide what objectives we need to pursue so that we can move from Vision to reality.

7.6 Each of the existing Visions has an accompanying set of objectives:

Corporate objectives are:

- enhancing and protecting our environment
- strengthening our economy
- strengthening our communities

[http://www.cheltenham.gov.uk/info/200009/performance\\_and\\_improvement/815/performance\\_management/2](http://www.cheltenham.gov.uk/info/200009/performance_and_improvement/815/performance_management/2)

“Our Future, Our Choice” objectives are:

- Promoting community safety
- Promoting sustainable living
- Promoting a strong and sustainable economy
- Building healthy communities and supporting older people
- Building stronger communities and supporting housing choice
- A focus on children and young people
- Investing in environmental quality
- Investing in travel and transport
- Investing in arts and culture

[http://www.cheltenham.gov.uk/downloads/file/3151/sustainable\\_community\\_strategy](http://www.cheltenham.gov.uk/downloads/file/3151/sustainable_community_strategy)

JCS objectives include:

- Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space
- Conserve and improve the built environment
- Conserve and improve the natural environment
- Foster economic growth
- Provide for local housing need
- Address social inequality, inclusivity and provide for healthier and safer communities
- Improve skills and educational attainment
- Increase access to jobs/services via sustainable transport modes

<http://consult.gct-jcs.org/consult.ti/JCSDPO/consultationHome>

7.7 Whilst it does not set out a vision, the existing Cheltenham Borough Local Plan (adopted 2006) contains thirty-six objectives including:

- to achieve a high standard of design in new development
- to reduce crime and the fear of crime
- to make provision for identified development needs
- to create more sustainable patterns of development, with priority use of previously-developed land
- to meet the needs of the elderly and people with disabilities
- to conserve and improve Cheltenham’s architectural, townscape and historical heritage
- to conserve and improve Cheltenham’s landscape character and green environment
- to prevent the coalescence of Cheltenham with other settlements
- to reduce waste and energy consumption and conserve natural resources
- to maintain and enhance the economic vitality of the borough

- to safeguard land and buildings in existing employment use, or if unoccupied, last in employment use
- to meet housing requirements, including the need for affordable housing
- to maintain and enhance the vitality and viability of the town centre as a sub-regional shopping centre
- to increase the range of facilities for recreation and leisure
- to encourage provision of a range of facilities and attractions for tourists
- to encourage the retention and provision of a range of community facilities and services
- to promote sustainable transport
- to ensure infrastructure in development is provided to a satisfactory standard

[http://www.cheltenham.gov.uk/downloads/file/778/cheltenham\\_borough\\_local\\_plan\\_second\\_revision\\_2006](http://www.cheltenham.gov.uk/downloads/file/778/cheltenham_borough_local_plan_second_revision_2006)

What do you think of these objectives? In your view have we delivered on them? Is there anything missing? Anything that's wrong? How can we make the objectives more "Cheltenham specific"? If you had to prioritise just ten, which ones would you choose and why? Remember too that we need to be able to show a Planning Inspector that our objectives are relevant, realistic and deliverable.

### **The Cheltenham Plan – potential planning policy areas**

8.0 Once we have our Vision and Objectives in place, the next thing we need is a suite of policies and proposals that will enable us to deliver them "on the ground". In formulating our policies and proposals we need also to remember the legal context and "material planning considerations" outlined above. Many policy areas are common to both the JCS and the Cheltenham Plan – matters such as housing and employment. A critical issue will be to clarify precisely what aspects will be dealt with in the JCS and what will be picked up by the Cheltenham Plan. Also important is what should not be included as it is appropriately dealt with via the National Planning Policy Framework

8.1 We think the range of policy areas we need to cover is:

- the overarching presumption in favour of sustainable development, as required and defined by the national Planning Policy Framework;
- economy and employment – including tourism and leisure uses, non-strategic policy<sup>2</sup> and site allocations;
- retail – town, district and neighbourhood centres – designation of primary and secondary shopping frontages and non-strategic policy and allocations;
- sustainable transport – local parking matters, car parks, walking, cycling;
- communications infrastructure such as mobile phone masts and adaptability to new technology;
- housing – non strategic policy and site allocations, house space standards, self-build, (affordable housing policy will be set out in the JCS)
- design – design codes to ensure quality of development;
- healthy communities – air quality, green space and community facilities;
- climate change and flooding - including renewable energy, energy efficiency and adapting to climate change;
- natural environment – any non-strategic policy and land allocations/designations e.g local nature reserves;

<sup>2</sup> the term "non strategic" refers to matters that primarily are local in nature and not addressed by the Joint Core Strategy or the NPPF

- historic environment – any non-strategic policy and allocations/designations
- local Infrastructure – non-strategic provision including recreational space;
- deliverability and implementation – viability appraisal
- monitoring
- adopted policies map

What do you think? Have we missed anything? Bear in mind that the JCS will deal with a considerable number of issues – such as major development sites.

### **The Cheltenham Plan – delivery**

- 9.0 This is arguably the most critical part of the plan. It's all very well having visions, objectives, policies and proposals but the acid test is whether they deliver on their promises. One of the most important tasks for the Cheltenham Plan is therefore to be realistic about delivery. And this is an issue the government via the National Planning Policy Framework and the Planning Inspectorate is particularly focused on.
- 9.1 If we have doubts about the deliverability of any aspect of our plan we need to examine the reasons for that as soon as the issue emerges and put it right. If we can't – we need to rethink the objective or policy and be prepared to take a different tack.
- 9.2 One of the most effective ways of understanding the deliverability of a development plan is through viability assessment. We may be expecting a significant amount of high quality infrastructure to come forward in the plan period funded largely by developer contributions. The assessment needs to be undertaken when the plan proposals are beginning to emerge and will need to be done iteratively i.e. in stages so that any adjustments to the plan can be made and then re-tested. It will tell us, for instance, whether we will be endangering the economic viability of a particular site or of the entire suite of plan proposals because the developers will simply not be able to make enough contributions while taking a reasonable profit (on the basis of accepted industry standards).
- 9.3 Other methods of assessing the effectiveness and deliverability of the plan are through monitoring of, say, housing completions or differentials in completions and through annual processes such as the Strategic Housing Land Availability Assessment (SHLAA for short) and the Strategic Economic Land Availability Assessment (SELAA).
- 9.4 Thinking about these land assessment processes, it is unlikely that Cheltenham will be able to provide enough sites to meet the “objectively assessed need” for development within the borough<sup>3</sup>. For it to do so, land will need to be identified in neighbouring authority areas. Whilst the JCS will rightly deal with much of this, it will be expected that as much land within the borough as is reasonable having regard to material planning considerations should be released to contribute to meeting the identified development need. The next phase of the plan – the consultation draft – will put these sites forward for public consideration. But it is likely that most if not all of the sites have already come to the attention of the council through the SHLAA and SELAA processes.

How do you think we can best deliver our objectives? What do you think the issues are?

<sup>3</sup> This will be set out in the JCS.



## The Cheltenham Plan – so what's next?

- 10.0 Your comments on the proposed scope of the Cheltenham plan will be considered by officers and a response report will be provided on the Council's website, at the offices and at libraries around the town, see below for the full list. The response report will summarise the issues raised as part of the consultation and will provide the council's response.
- 10.1 The comments will be used to inform the preparation of the draft Cheltenham Plan, which will form the second stage of consultation next Spring. This next stage will start to set out the detail on the policies and allocations proposed for Cheltenham and so it will be an important consultation to look out for - [http://www.cheltenham.gov.uk/info/1004/planning\\_policy/1034/the\\_cheltenham\\_plan](http://www.cheltenham.gov.uk/info/1004/planning_policy/1034/the_cheltenham_plan)
- 10.2 The key stages for the Cheltenham plan are shown on the timetable above and summarised below:
- |  |                    |
|--|--------------------|
| Consultation on Scope of Cheltenham Plan | Summer 2013        |
| Consult on draft Cheltenham Plan         | Spring 2014        |
| Consult on proposed submission Plan      | Winter 2014        |
| Submission and examination of Plan       | Winter/Spring 2015 |
| Adoption                                 | Summer/Autumn 2015 |
- 10.2 Details of future consultation events, both for the Cheltenham Plan and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy will be included on the Cheltenham Borough and GCT JCS websites, if you would like to be notified directly of consultations, please contact the Planning Policy team and asked to be added to our database.

### How to get involved:

- 11.0 Comments to be submitted by **DATE** either by post, email or via the online database.

Contact the Planning policy team:

**Email:** [slu@cheltenham.gov.uk](mailto:slu@cheltenham.gov.uk)

**Telephone:** 01242 264379

**Post** Municipal Offices, Promenade, Cheltenham, Gloucestershire, GL50 9SA

*Insert weblink to inovem*

If you are not already registered on the database and would like to do so, please follow the link to *Insert weblink to inovem*

A response form has been included for your convenience

***INSERT RESPONSE FORM***