

1 KEY ISSUES

Issue 1: Sustainability

- 1.1 The incorporation of sustainability as a key principle within the local plan gained a significant level of support from respondents. However, the need to feed this principle through the whole of the local plan was emphasised, together with the need for sustainable development to take into account features which are important to the town, such as the high quality built environment and open spaces.
- 1.2 The needs of the community were considered to be at the heart of sustainability, and particularly the need to minimise the disparity between poorer and more affluent members of the community. Comments suggested that this could be achieved by creating opportunities and choice in employment, housing, services and facilities.
- 1.3 Areas of particular concern included;
- provision of a wider range of venues to support community needs of the town and wider festival culture
 - consideration of wider age groups, particularly in regard to facilities provided within the town centre during the evening, and the need to provide safety and security for all users (refer to key issue - town centre)
 - provision of shops in the town centre and neighbourhood centres which provide for the needs of the community
 - provision of sports and play facilities, particularly for the teenage group. Facilities for skateboarding identified as a specific need.
- 1.4 Responses also highlighted the need to address drainage of surface water from development and promotion of buildings which minimise impact on the environment through reduced energy consumption and use of materials.

Issue 2: Housing

- 1.5 The need to meet the housing requirements of the Gloucestershire Structure Plan was generally supported, with significant support for the development of brownfield sites. However, it was felt that the local plan/Council should provide greater assistance to enable the re-use of buildings, both to bring them back into active use and to improve quality of the built environment. Whilst support was given to better use of land, concern was expressed regarding increasing densities, particularly in conservation areas. A number of developers commented that not all brownfield sites are sustainable, and as such the identification of sites should consider opportunities for the development of greenfield sites which perform well in terms of sustainability.
- 1.6 Strong concerns were raised regarding the development of greenfield sites. Whilst it was accepted that some development of greenfield sites may have to take place over the plan period, it should only occur when no other brownfield site is available. Greenfield sites should be protected to maintain open areas within the built environment and the wider Green Belt.

- 1.7 Support for affordable housing and its integration with market housing. It was considered that justification for the lower threshold of the provision of affordable housing should be explicit.

Issue 3: Employment

- 1.8 Respondents raised significant concerns regarding lack of allocation of land for employment. Consideration should be given to the provision of sustainable strategic sites, mixed use development, and assessment of existing employment sites in terms of their protection, or release to other land uses.

- 1.9 The definition of employment land was highlighted, with suggestions that this should be more flexible to provide choice of sites and stimulate competition.

Issue 4: Built and Natural Environment

- 1.10 Key issues regarding the built environment generated significant comment. 'Good design' and the need for new development to be sympathetic to existing buildings were debated by respondents. Support was given to design which reflected Regency and Victorian architecture within the town.

- 1.11 Comments were made regarding the restoration and re-use of existing buildings. Preparation of a list of locally important buildings was recognised as one way of protecting significant buildings which are at risk from demolition, bringing them back into active use.

- 1.12 Noise and light pollution were identified as issues which affected the quality of the environment of the town.

- 1.13 There was wide support for the protection of open spaces within the urban area and the wider countryside. Such spaces provide opportunities for recreation, relaxation, support wildlife, and have a positive impact on the quality of the environment of the town. Concerns were raised regarding the potential loss of playing fields within the town.

Issue 5: Transport

- 1.14 The key issue of transport gave rise to a diverse range of detailed comments and produced the greatest level of response. Generally respondents expressed the view that Cheltenham was experiencing traffic problems which affect access to the town centre, movement around the town and the quality of life of residents. The Key Issues paper described how the Council seeks to address these issues through the transport strategy. Comments in response the transport strategy are set out below.

parking

- 1.15 Comments on car parking were broadly divided into two key areas. Firstly, support for reducing the number of long stay car parking spaces within the town centre, supported by improvements in public transport and provision of park and ride. Secondly, a number of respondents felt that the transport strategy sought to marginalise the motorist, and did not reflect the needs of members of the community and visitors who are less able to leave their car outside the town centre and use public transport. Concerns were also raised regarding the impact of reduced town centre car parking on neighbouring residential areas, and the safety and security of existing car parks.

alternative modes of transport

- 1.16 General support for park and ride, although comments noted that such facilities would only become successful if motorists were dissuaded from parking in the town centre by the increase in car parking charges and encouraged to use public transport by the introduction of cheap fares. A number of comments noted that park and ride should not be seen as a sustainable option as it does not address the objective of reducing the need to travel.
- 1.17 On the whole respondents considered the existing public transport provision to be of a poor standard, particularly in regard to reliability of services.
- 1.18 A number of comments received in support of a centralised modern bus interchange.
- 1.19 The need to improve facilities for cyclists was identified as important in encouraging people out of their cars, including extending cycling routes, providing segregated cycle lanes, and considering the needs of cyclists in developing new schemes such as pedestrianisation.
- 1.20 Some respondents considered that the use of rail as a sustainable transport mode for people and goods was not recognised in the Key Issue paper. Comments outlined the need to improve the quality of services and facilities. A number of specific comments were received regarding the safeguarding and restoration of the Cheltenham - Honeybourne - Stratford railway line for heavy rail services.

traffic management

- 1.21 Many objections to the inclusion of the North West Distributor Road, with a small number in support (refer to draft development strategy).

Issue 6: Town Centre

- 1.22 Issues affecting the town centre generated a number of comments, with access being a particular issue of importance (refer to Issue 5 - *parking*). There was a degree of conflict within this debate of access between support for pedestrianisation and provision of access and car parking close to services and facilities.
- 1.23 The need to improve the range of shopping facilities was identified by respondents, including comment by a food retailer suggesting that that the local plan identify sites for retail development by type.
- 1.24 Responses were received relating to the environmental and social impacts of the evening economy, and the need to cater for the wider community in services and facilities provided. Safety and security were highlighted as important issues for users of the town centre during the evening.
- 1.25 The poor provision of public conveniences was criticised by a number of correspondents. These were considered important in meeting the needs of visitors to the town.

Issue 7: Planning Obligations

- 1.26 Supported. (refer to planning obligations paper).

Issue 8: Development Strategy

- 1.26 Generally comments received in response to Issue 8 related to the protection

of the Green Belt from development. However, a number of respondents supported relaxation of restrictions where this would bring forward sustainable development.

Issue 9: Cross Boundary Considerations

- 1.27 Respondents expressed support for the Council's approach to working together with neighbouring authorities. Comments indicated that such joint working should aim to protect the Green Belt.

2 DRAFT DEVELOPMENT STRATEGY

Influences on the Strategy

- 2.1 Respondents highlighted the need for the local plan to update references to national and regional guidance, Gloucestershire Structure Plan, neighbouring local plans, and the community plan. Gloucestershire County Council requested deletion of references to Cheltenham Transport Plan which did not reflect the Gloucestershire Local Transport Plan.
- 2.2 The impacts of development raised a number of concerns. Some respondents considered that Cheltenham should have more control over development adjacent to its boundaries. There were also comments that the strategy was contradictory in that overall it supported the Green Belt, but proposed development for employment in policy PR3 and the safeguarding of land for the North West Distributor Road.
- 2.3 The influences of design of development generated some comment, respondents questioning who was responsible for determining what constituted good design within Cheltenham.

Strategy - Scope, Themes, Vision, Objectives

- 2.4 Significant support for objective to meet development needs of Cheltenham within the urban area on brownfield sites. Some respondents accepted that some release of greenfield land would be required over the plan period.
- 2.5 Concerns raised regarding the Council's approach to reducing congestion and improving traffic flow. It was felt that the town had to have the infrastructure in place to meet this objective. Other comments were that the local plan should not place restraints on development to force people out of their cars - it was considered essential that people should have the freedom of choice to travel by private car.
- 2.6 Developers questioned the basis for lowering the threshold of provision of affordable housing. Respondents requested data to demonstrate application of a lower threshold.
- 2.7 Comments expressed concern about the non allocation of land for employment use, and lack of comment on whether the Council supported provision of 12ha of land for employment as set out in the Structure Plan. Respondents said that the local plan should clearly indicate whether amendment to the Green Belt boundary would be required to accommodate this land use.
- 2.8 The quality of the built environment was considered important by a number of respondents. The need for the local plan to recognise and protect important buildings within the town, both those which are afforded statutory

protection and those which make an important contribution to the character of the town, was stressed. The need to take account of archaeological sites in the development of land was also noted.

- 2.9 Alongside the built environment, the protection and enhancement of the natural environment was identified as important, including protection of the Green Belt and the designation and protection of open spaces.
- 2.10 Comments were made regarding the methodology of the urban capacity study (refer to urban capacity study).

Transport Strategy

- 2.11 Transport generated a number of comments, a summary of which is provided below. Many comments received reflected comments made in response to Issue 5 - Transport of the Key Issues Paper. Such comments are not reproduced in this section (for further details see paragraphs 1.14 - 1.21).
- 2.12 Sustainability principles of the transport strategy were supported by the majority of respondents, although some considered that many of the objectives could not be implemented without the correct infrastructure in place. It was accepted that the provision of public transport, improvements in facilities for cyclists and pedestrians would assist in encouraging individuals to make sustainable transport choices; but also that such provision is currently inadequate, particularly in regard to the reliability of public transport and provision of services throughout the town.
- 2.13 It was considered that opportunities to provide alternatives to the private car did not reflect rail services which are provided, and could be promoted through the local plan.
- 2.14 A number of comments were received both in support and objection to the development of additional park and ride facilities in Cheltenham. Comments in support noted that such sites should be suitably located and sustainable. Objections raised concerns in regard to the impact of sites upon the wider landscape.

Development Proposals

Policy PR1 - Land allocated for housing development

- 2.15 Policy PR1 raised a number of objections in regard to the allocation of land at Ireton and Benton, The Park.
- 2.16 Generally, the development of land at Starvehall Farm was accepted, although objections were raised in regard to loss of open space. The principal objection to development is a proposed link road between New Barn Lane and Prestbury Road (refer to Policy PR3)
- 2.17 Gloucestershire County Council outlined the need for archaeological evaluation on a number of allocated sites.

Policy PR2 - Land allocated for mixed use development

- 2.18 Objection that Policy PR2 does not allocate land for employment to meet the structure plan requirement of 12ha.
- 2.19 A respondent expressed concerns about the potential development of land

for residential use within the core commercial area of the town, where office, leisure and retail uses should be favoured.

- 2.20 Gloucestershire County Council outlined the need for archaeological evaluation on a number of allocated sites.

Policy PR3 - Land safeguarded for transport schemes

- 2.21 Policy PR3 generated the most significant response of consultation into the key issues facing Cheltenham up to 2011. Comments in objection and support were received in response to the safeguarding of land for future development of the North West Distributor Road, and the safeguarding of land to develop a link between Prestbury Road and New Barn Lane.

North West Distributor Road (NWDR)

- 2.22 A total of 2,119 letters of objection were submitted in response to the NWDR. 23 letters were individual responses. The remaining 2,096 were copies of a standard letter prepared by the Green Belt Protection Society. Objections raised included:

- development within the Green Belt
- destruction of recreational opportunities provided by existing public rights of way
- loss of biodiversity
- lack of strategic highway justification for the NWDR. Failure by Cheltenham Borough Council to investigate alternative options, such as upgrading of M5 junction 10, and increased investment in public transport
- development of NWDR will lead to development of housing and employment uses in the Green Belt
- NWDR will not reduce congestion. It will remove traffic from the town centre, but will not reduce the level of traffic or offer alternative modes of transport
- NWDR is not supported by Gloucestershire County Council
- development of NWDR will not address local traffic problems
- funding of the road has not been addressed.

- 2.23 26 letters were received in support of the NWDR. Comments included:

- support development of NWDR which is not funded by associated development
- NWDR will address volume of traffic in area of Wymans Lane/Hyde Lane/Princess Elizabeth Way
- NWDR will support economy of the town, supporting industrial, commercial and retailing uses
- development of NWDR will release land for development

Link between Prestbury Road and New Barn Lane

- 2.23 109 responses were received objecting to the safeguarding of land to provide a link between Prestbury Road and New Barn Lane. These responses included 14 standard letters, a petition signed by 31 residents, and a letter signed by 5 residents. Objections included;

- development of a link road would create a rat-run between A40 London Road and A435 Evesham Road
- increase in noise and air pollution
- loss of greenfield site, loss of recreation space
- character of Prestbury will be destroyed

- safety and access for pedestrians and cyclist will be compromised
- reduction in property values
- loss of safe access to existing properties
- link road will exacerbate existing flooding problems
- council should be seeking to reduce traffic, not finding alternative routes for it.

Proposed Land Allocations

2.24 A number of developers submitted representations requesting allocation of additional sites for residential, employment and mixed use development. These are listed below, and site plans attached.

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| • | Prowting Projects
Plan 1 | Land South-West of Swindon Village -
employment development (greenfield) |
| • | Hunter Page Planning
Plan 2 | Land at Hatherley Lane
retail development (greenfield) |
| • | Shoosmith Solicitors
Plan 3 | Land at Hunting Butts
residential development (greenfield) |
| • | King Sturge
Plan 4 | Land off Village Road
residential development (brownfield) |
| • | Foxley Tagg Planning
Plan 5 | Land at Charlton Kings
residential development (greenfield) |
| • | Mason Richards Planning
Plan 6 | Land at Leckhampton
mixed use development (greenfield) |

3 URBAN CAPACITY STUDY

- 3.1 General support for the preparation of the urban capacity study, the findings of which indicate that a large proportion of Cheltenham's housing requirements is likely to be accommodated on previously developed sites.
- 3.2 Detailed comments submitted in response to methodology of study setting out that figures are generally over optimistic within land use categories, and concern regarding the delivery of some sites within the plan period. A number of respondents said the local plan should identify land over and above Structure Plan requirements to allow flexibility in the release of sites, meeting housing need which may not be met by windfall development and development within the plan period of the GCHQ Oakley site. This would require the release of additional greenfield sites.
- 3.3 Comments highlighted general concerns on the reliance on windfall sites coming forward over the plan period. In this regard the House Builders Federation suggested a lower size threshold to increase the number of specific sites identified, giving greater robustness to the Urban Capacity Study. General agreement that opportunities exist within the sources of potential identified by the study. However, there were also comments regarding the need for restraint in areas of the town where infilling would be detrimental to the quality of the built environment.
- 3.4 Inclusion of monitoring and review of study was supported.

- 3.5 Some revised densities were suggested for identified sites. A number of respondents suggested the need to consider densities on a site by site basis rather than a general application of 30 dwellings per hectare set out in PPG3. Comments indicated support for design led consideration of densities.
- 3.6 Comments received proposing the deletion of site 3, land off Grovefield Way, and site 6, land at Ireton and Benton, The Park, from the site schedule.
- 3.7 Comments suggested that sustainability should be the core objective of the study, reflecting principles set out in key issue paper.

4 URBAN DESIGN FRAMEWORK

- 4.1 Overall, the preparation of the Urban Design Framework was welcomed, and the council congratulated on acknowledging the importance of urban design in preparing the review of the local plan.
- 4.2 The issue of design generated a significant number of comments. Comments were divided between the need to protect the quality of architecture which already exists within the town, reflecting this in new development, and development which incorporates modern and innovative design. The framework encouraged debate on what constituted inappropriate design.
- 4.3 Comments outlined the importance of open spaces as well as the built environment as being critically important in the consideration of urban design.
- 4.4 General thrust of transport measures supported; however, the need to make provision for the private car and importance of providing direct access to the town centre for public transport, taxis, cyclists and pedestrians was identified.
- 4.5 Respondents felt that the framework was too focused on the central area of Cheltenham and needed to consider the town in its wider context, including the urban fringes. In considering these areas the views of local communities which would be directly affected by proposals should be taken into account.

5 PLANNING OBLIGATIONS

- 5.1 Overall support for the preparation of supplementary planning guidance (SPG) on planning obligations. Respondents commented that obligations should accord with Circular 1/97 in being relevant to the development site.
- 5.2 Respondents indicated additional contributions which could be sought via planning obligations, including open spaces and rehabilitation of degraded environments.
- 5.3 The majority of respondents commenting on planning obligations related to affordable housing and transport. These comments are summarised below.

affordable housing

- 5.4 General support that SPG will assist in securing affordable housing within the town. However, data to support lower thresholds should be updated regularly to illustrate housing needs over and above requirements set out in Circular 6/98. Comments proposed that the Council should favourably consider flexibility of car parking, design and space standards to assist developers to meet required affordable housing provision.

5.5 A number of respondents objected to requirement of commuted sums for off site provision of affordable housing units in areas where a high level of affordable housing is already provided. Comments outlined that planning reasons may identify reasons why affordable housing should *not* be provided.

5.6 The need to consider key worker housing was highlighted, assessed via revision of the housing needs survey.

transport

5.7 General support for transport element of planning obligations SPG. Comments received included the need to strengthen information on travel plans, identifying circumstances when they would be required. Developer contributions should encompass improvements which will support all sustainable transport modes.

6 APPRAISAL OF EXISTING POLICIES

6.1 Specific comments made in response to guidance set out planning policy guidance notes (PPGs).