

**APPENDIX 2  
RESPONSES AND RECOMMENDATIONS**

**KEY ISSUES**

Ref. No.	Para/ Section	Summary of Response	Project Nexus Recommendation
<b>Issue 1 Sustainability</b>			
<i>general</i>			
144		<b>English Nature</b> We welcome the adoption of sustainability as a key principle within the local plan. The inclusion of objectives of sustainability should be at the heart of the plan. You may wish to consider including a policy as well.	Comments noted. Sustainability is a strategic theme of the local plan review. <b>Local plan objective O6, O7, O13, O17, O19, O20, O21, O22, O24, O25, O26, O27, O28, O29, O35</b> <b>Recommend</b> the Council will consider whether a specific policy setting out the councils expectation in reagrds to the application of sustainability principles in land use is required, or whether this may be appropriately integrated through the plan in the justification of policies.
169		<b>Oldfield King Planning</b> Welcome the recognition of four broad objective of sustainability, especially the need for 'social progress which recognises the needs of everyone'. However, no further reference is made to affordable housing/social progress as a key issue and is therefore not regarded as being one of the major considerations in achieving sustainable development.	Sustainable development sets out a number of objectives, including that of social progress which meets the needs of everyone. This objective is considered again in Issue 2: Housing which sets out the need for the local plan to promote mixed communities and bring forward affordable housing in response to the provisions of PPG3. <b>Local plan objective O5, O22</b> <b>Recommend</b> in formulating revised housing policies the local plan will have regard to the Council's Housing Needs Study, urban capacity study and PPG3 which address the provision of housing within Cheltenham. Housing provision during the plan period will be required, through integrated development to provide for inclusive communities.
183		Gloucester City Council General thrust of issues papers, in particular their emphasis on sustainable development, is supported and welcomed by this Council	Comments noted.
189		<b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b> A sustainable approach to development is welcomed.	Comments noted.
190		<b>Vision 21</b> Appreciate identification of sustainable development as first issue in this paper. Believe that this needs to be at core of all proposals for development in town. Our view that in this paper and throughout series of papers that constitute this review council has gone a long way to achieving this goal.	Comments noted.
193		<b>Countryside Agency</b> welcomes emphasis placed on need for sustainable development and its impact on planning.	Comments noted.
194		<b>Mason Richards Planning (on behalf of Bovis Homes)</b> support Council in identifying necessity for sustainable development as a key issue and in ensuring that new development is genuinely sustainable and that adequate safeguards are put in place regarding the built and natural heritage particularly regarding protection of green spaces.	Comments noted.
214	1.5	<b>Railtrack</b> This section fails to mention rail - clearly this forms part of the range of	Comments noted. <b>Local plan objective O35</b>

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		alternatives to the private car and must be promoted as an alternative mode of transport both for passengers and for freight.	<b>Recommend</b> local plan will reflect opportunities offered by rail in providing an alternative to the private car. The Council will consider opportunities for movement of freight by rail.
224	1.3	<b>Environment Agency</b> Water minimisation, rainwater harvesting and grey water recycling are all important features in this process.	Water minimisation forms part of wider the objective of the prudent use of natural resources. The Council will prepare supplementary planning guidance on the application of sustainable urban drainage (SUDS), this guidance will include the need for developers to consider and implement where appropriate water minimisation.
	1.4	Vital to stress "wildlife movement" aspects of green spaces.	Comments noted. The Council will consider movement of wildlife when reviewing natural environment policies.
	1.6	Include additional words at end "or control its rate of release to such networks."	Amendment supported. <b>Local plan objective O6, O12, O16, O17, O18, O30, O31</b> <b>Recommend</b> preparation of SUDs SPG. Review of the councils approach to linking open spaces within the town to create a strategic green network.
228	1.5	Support encouraging journeys by bus, cycle or on foot, however latter two forms should not be forced, by lack of alternatives, onto anyone. Buses must be regular, safe, easy to access, have seats and shelter at bus stops, and every town household should have a bus stop within 400 yards. This will mean that many bus routes will not be commercially viable and so should have some form of subsidy to enable travel both in the daytime and at night	Gloucestershire Local Transport Plan and Cheltenham Transport Plan consider the strategic cycle and pedestrian needs of the town, including existing and proposed facilities. The transport strategy of the local plan will seek to reflect these requirements to meet the objective of promoting sustainable transport choices.  Through the Cheltenham Transport Plan the Council is working with public transport providers through a Quality Bus Partnership to bring forward a more integrated and reliable bus network. <b>Local plan objective O35, O36</b> <b>Recommend</b> integrate proposals set out in Cheltenham Transport Plan.
272		Welcome that sustainability is placed first, as it should be.	Comments noted.
274	1.4	<b>Shoosmith Solicitors (on behalf of J. A. Ltd.)</b> Council's approach to sustainable development broadly supported, although considered that in following two respects approach too limited:	
	1.5	Should acknowledge that in context of Cheltenham - historic character, need to protect open spaces - consideration may need to be given to development on green field sites adjacent to existing urban area. This approach is endorsed in PPG3 paras 31/32  Insufficient emphasis placed on importance of maximising opportunity to travel by means other than the car.	PPG3 paras 31/32 sets out the criteria which should be applied to the allocation of sites within development plans. These provisions have been taken into account by the Council in the identification of sites. Emphasis should not be placed merely in the promotion of alternative means of transport, but also on reducing the need to travel. Consideration of sites for development must take this into account. <b>Local plan objective O6, O7, O9, O11, O35</b> <b>Recommend</b> no change
278		Sustainable Development is acceptable for town areas and should be very carefully imposed on rural areas with complete respect of the environment. Plan should reflect and respect fact that there are areas outside the	Comments noted.

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		town, but within the borough, that also have a special built environment that should be equally respected.	
283		<b>Cheltenham Friends of the Earth</b> Welcome apparent intention to place sustainable development at heart of plan. Long term vision of Draft Development Strategy should be supported by specific relevant targets to help assess progress towards envisioned state. Request council investigates potential of Countryside Agency's new assessment process "Quality of Life Capital". Urge council to ensure local plan provides for fullest level of public participation in planning process through use of tools like Planning for Real and requiring developers of major schemes to demonstrate they have sought views of local community and involved them in design.	Comments noted. The Council will identify appropriate indicators and targets which will assist the monitoring process of the local plan.  The Council will seek to engage with as many community/interest groups, and individuals as possible through the local plan review process. The main vehicle for public consultation will be via the Council's newspaper 'The Clarion'. All groups and individuals who have already expressed an interest in the local plan will be notified of the key dates of public consultation by letter. Where possible the Council will publicise consultation on the local plan in accessible public areas/buildings such as local libraries, and parish council notice boards.
286		<b>Robert Hitchins Ltd.</b> Sustainable development is also about making best and most effective use of existing infrastructure.	Agree.
287		<b>CPRE</b> Sustainable development - commend this clear exposition, in simple language, of facts and implications of this core issue. Would not disagree with anything which paper has to say on matter.	Comments noted.
291	1.4	<b>Leckhampton Green Land Action Group</b> Reference to safeguarding of built and natural heritage including green open spaces welcomed. However use of word 'safeguarding' in this context is questioned because word has specific meaning of safeguarding for future development in planning documents (see definition in Annex B to PPG2 Revised). Therefore propose that 'safeguarding' be replaced by 'protection of' in para 1.4.	Agree. <b>Recommend</b> change wording where appropriate.
292	1.4	<b>Gloucestershire County Council</b> Government guidance and structure plan provide clear advice on historic environment. This policy area is not well in sections on sustainable development.  Phrase 'the built and natural heritage' does not include any reference to historic environment. Recommend change to 'the natural and historic environment' or 'the natural built and historic environment' to more accurately reflect nature of environment in both urban and rural context and to fit appropriately with government guidance and structure plan policies.	Existing local plan embodies the historic environment within the chapter and associated policies of the built environment. Para 1.4 reflects this. <b>Recommend</b> expand title of the built environment to provide clarity.
295		<b>Swindon Parish Council</b> Sustainable development is acceptable for town areas, but should be very carefully imposed on rural areas with complete respect for environment.  By pushing out those who could afford homes in Cheltenham but who choose not to because of these anti-car policies,	The Council via its housing needs study has identified the difficulties which some residents of the town experience in finding housing which meets their needs in terms of size, type, tenure and affordability. <b>Local plan objective O22</b> <b>Recommend</b> incorporate findings of a housing

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		Cheltenham will be turned into a very well off society to whom costs of living are largely irrelevant coupled with a poorer society living in 'affordable housing' and such properties may well attach a stigma of their own. Is there any 'right' to be able to stay close to family, friends and job?	needs survey prepared on behalf of the Council by Fordham Research. This survey sets out that the need for affordable housing is not being met in Cheltenham. The local plan will consider how this can be addressed through the planning process through the requirement of a proportion of affordable housing to be provided on sites providing over 15 dwellings.
294	1.7	Cheltenham relatively small town in national scheme of things, not 'major urban area'.	Cheltenham is identified as a major urban area within the context of Gloucestershire.
<i>services and facilities</i>			
9		I was reading the Clarion, for a start Cheltenham is not safe to walk around. Second, all the shops are very dear to buy anything for people who can't afford things nice when they are on low incomes. Cheltenham is a snob town, which does not care for the poor people who also live here. Rented housing - rent and rates go up high, wages do not. Transport is rubbish as well, we pay way over the top for it - even day trips are over the top. Some mothers can't even take kids out for the day as it costs too much. As for cars down the poor end of town, cars should not come down there and park - eyesore. I see more and more people getting poor and the rich don't care. Think and help people who need it - Whaddon, St Paul's etc. You may not print this, I don't care.	The local plan is set within the government's strategy for sustainable development. One of the objectives of this strategy is 'social progress which meets the needs of everyone'. In reviewing the local plan the Council will consider the development needs of all socio-economic groups within the town, including the provision of a range of housing types and tenures, the need to stimulate economic activity, provision of services and facilities which meet the needs of residents and visitors to the town, and improving accessibility by alternative modes of transport. <b>Local plan objective O6</b> <b>Recommend</b> link policies and proposals to local plan objective O6 which seeks to 'create more sustainable patterns of development'. Reflect initiatives set out in the Council's 'Strategy for Regeneration', 'Social Justice Strategy' which seek to address issues which arise due to economic and social deprivation, and the 'Cultural Strategy' which seeks to offer access to a wide range of cultural facilities for all members of the community.
34		What is not mentioned in the Clarion, a big mistake by the council, is what new leisure facilities are planned. We have to drive to Swindon to use a fairly old and tired ice rink.  You are packing in more people, more supermarkets. We surely now need more (and different) things and jobs to do. If subsidies are needed - public/private partnership.	A strategic theme of the local plan is one of sustainable development. Sustainability has many implications which includes the provision of services and facilities to meet the needs of residents and visitors to the town. <b>Local plan objective O27, O28</b> <b>Recommend</b> the local plan will continue to provide opportunities through its policies which supports the development of new leisure facilities in sustainable locations, supporting the aims arising from the Council's Cultural Strategy.
40		Pleased to see the need for an alternative arts space is identified. I would plead with the council to support those who are pouring time and effort into retaining the Axiom Centre as the Cheltenham Arts Centre. There is a definite hole in cultural provision which rebuilding can fill. Cheltenham needs the centre.	Comments noted.
66		The festivals (music, literature, jazz, cricket) are splendid but we need a new concert hall.	Comments noted. <b>Local plan objective O27, O28</b> <b>Recommend</b> the local plan will continue to provide opportunities through its policies which supports the development of new leisure facilities in sustainable locations, supporting the aims arising from the Council's Cultural Strategy.
95		Should the town not be more supportive of the	The local plan recognises the importance of arts,

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		festivals? All these struggle to survive through private sponsorship. Cheltenham does not promote these assets to its own people. Local people seem to ignore their existence, their input and support should be increased.	culture and festivals within the town, particularly in regard to the economy and tourism. <b>Local plan objective O28</b> <b>Recommend</b> reflect the objectives set out in the Council's Cultural Strategy. This strategy recognises that not everyone has equal access to cultural opportunities. The strategy will address how cultural events and facilities may be promoted to widen the level of involvement within the community.
106		I think that we have enough shops, restaurants, pubs and night-clubs already, except perhaps in some of the neighbourhoods. Local shopping centres need all the encouragement you can give them.  In general, Cheltenham needs more sports facilities, library and arts space. These would be greatly appreciated.	The local plan will continue to support the facilities provided by neighbourhood centres through policies which protect their retail function. In reviewing retailing policies, the Council will consider how local needs may be met through the location of accessible local shops, and how new facilities may be provided in new developments. <b>Local plan objective O25</b> <b>Recommend</b> amendments to policies RT87 New local shopping centres, and RT89 Corner shops  <b>Local plan objective O27, O28</b> <b>Recommend</b> the local plan will continue to provide opportunities through its policies which supports the development of new leisure facilities in sustainable locations, supporting the aims arising from the Council's Cultural Strategy.
115	Pg3	We may be a 'town of festivals', but we have to have venues to attract more quality musicians and lectures. A university town needs this.	See ref. 106
118		How about catering for the over 30's and not going over the top catering for the youth. A few less clubs and fast food outlets especially 'late night' would help.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Comments noted. <b>Local plan objective O29</b> <b>Recommend</b> the Council will consider how policies of the local plan can assist in meeting the needs of all members of the community and visitors to the town, reflecting the aims of the Council's Cultural Strategy.
120		I disagree that Cheltenham has a lively arts scene. We desperately need an arts centre, accessible to all in which to provide a venue for local and national bands (other than jazz and classical) and to provide gallery space for artists (modern art) and hold workshops.	Comments noted. <b>Local plan objective O27, O28</b> <b>Recommend</b> the local plan will continue to provide opportunities through its policies which supports the development of new leisure facilities in sustainable locations, supporting the aims arising from the Council's Cultural Strategy.
121		Provide a purpose built public library. I find the present building depressing.	Adopted local plan identifies proposals by Gloucestershire County Council to relocate the Central Lending Library to a site off Chester Walk. Relocation would provide improved library facilities and enable the art gallery to expand. <b>Local plan objective O27, O28</b> <b>Recommend</b> The local plan review will continue to reflect the County Council's long term needs regarding Cheltenham Central Library..
131		Stop out of town shopping developments. The town centre now has very few useful shops for residents. Only one greengrocer remains. We need more shops for residents in town, similar to the excellent Bath Road	Government policy regarding retail development identifies the important role of town centres and the need to adopt a sequential approach to the assessment of development options. The first preference should be for town centre sites, where

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		shopping area.	suitable sites or buildings suitable for conversion are available, followed by edge of centre sites, district and local centres and only then out of centre sites in locations that are accessible by a choice of means of transport. <b>Local plan objective O25</b> <b>Recommend</b> in reviewing retailing policies, the Council will consider how local needs may be met through the location of accessible local shops, and how new facilities may be provided in new developments. Amendments to policies RT87 New local shopping centres, and RT89 Corner shops
139		<p>Nothing apart from the theatre appeals to the older generation who have time (and money). Cheltenham may have several cultural festivals, but this is only for a few weeks each year. A lot more could be done in this respect - but only in a safe environment.</p> <p>The town centre could have basic shopping facilities to meet needs of non car owners. Hats off to Tesco, who have seen a demand and are improving facilities.</p>	<p>Comments noted.</p> <p><b>Local plan objective O25, O26, O27, O28, O29</b> <b>Recommend</b> the Council will consider how policies of the local plan can assist in meeting the needs of all members of the community and visitors to the town, reflecting the aims of the Council's Cultural Strategy.</p> <p>In reviewing retailing policies, the Council will consider how local needs may be met through the location of accessible local shops, and how new facilities may be provided in new developments.</p>
159		<p>Para 14.3 Existing Plan: Would you kindly consider adding to the Local Plan statements to the following effect:</p> <ol style="list-style-type: none"> <li>1. A recognition of the importance of adequate, accessible meeting rooms, large and small, to the maintenance of a healthy, active and peaceful society, and</li> <li>2. An intention to keep the provision of meeting rooms under consideration and to promote their construction wherever they are needed.</li> </ol> <p>Background information</p> <p>a. Social Responsibility: The Council has a duty to care for what might be called social health. Meeting is an absolute requirement for all kinds of openness, voluntary effort, learning and specialist interests. In our climate, meeting requires meeting rooms.</p> <p>b. Shortage at Present: Though there are many rooms in existence in Cheltenham, they are largely not available regularly or not easily reached by public transport. When U3 A wished to entertain visiting Italians for instance, the only available central meeting room with kitchen was St Luke's where shared use with a dog training session was offered. The event took place in Shurdington. The WEA has to restrict the classes it offers because it cannot find rooms. The Friends of the Art Gallery and Museum has to refuse some attendances because the museum room is too small. This room and the Chester Room are also practically unavailable out of working hours.</p>	<p>A strategic theme of the local plan is one of sustainable development. Sustainability has many implications which includes the provision of services and facilities to meet the needs of residents and visitors to the town.</p> <p><b>Local plan objective O26, O27, O28, O29</b> <b>Recommend</b> the Council will consider how policies of the local plan can assist in meeting the needs of all members of the community and visitors to the town. In addition the Council will seek to safeguard sites which have been used for community purposes from loss to other uses.</p>

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		<p>c. Local Comparisons: Cheltenham has a particularly rich cultural perspective. This is bringing in to the town even greater need for meeting rooms. But our provision, despite the excellent Town Hall and Pump Room, both built for grander and large occasions, is relatively low. Gloucester, Tewkesbury, Stroud, Northleach, Cirencester, Shurdington all have relatively better provision. Each of these facilities has enabled greater productive activity.</p> <p>d. Opportunity: The Plan is influential. There should be a statement in the Plan supporting the provision of meeting places. Then this can be shown to large scale developers at an early stage to start joint consideration of possibilities before it is too late. Potential central sites still exist. There are various government and other incentives and assistance available towards community development, particularly for older people, and there are many excellent examples around of collaboration between local and county councils, developers, local societies and public funds.</p>	
228	1.5	Not enough to supply local shops/services to try to reduce number of car journeys. Facilities must be as good as the best to stop travel to the best.	Acknowledge need for high quality services to reduce number of car journeys. <b>Local plan objective O25, O29, O36</b> <b>Recommend</b> in reviewing retailing policies, the Council will consider how local needs may be met through the location of accessible local shops, and how new facilities may be provided in new developments.
273		Disappointed that central library and four branch libraries not included in facilities noted as being on offer within the Borough.	Comments noted. <b>Recommend</b> amend reference to local facilities to include central and local libraries.
<b>Sports/play facilities</b>			
51		There is insufficient provision of playing fields.  <i>Response included a number of comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	The Council has appointed consultants Knight, Kavanagh & Page to consider the provision of playing pitches within the town. <b>Local plan objective O26, O27</b> <b>Recommend</b> incorporate findings of the Playing Pitch Strategy into the deposit draft of the local plan. Where appropriate playing fields will be safeguarded from future redevelopment.
52		Living in Wymans Brook with young children I am amazed that the nearest play area is Pittville Park. Are there any plans for a playground for this area, possibly Swindon Village park? There are many young families who would benefit from this and would also prevent children hanging around railway lines.	The local plan will seek to ensure that sufficient play facilities are provided throughout the Borough. <b>Local plan objective O27</b> <b>Recommend</b> consider whether existing SPG guidance on play space provision requires updating.
83		Allocation of places for young people to 'play', i.e. skateboarding etc.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	The local plan will seek to ensure that sufficient play facilities are provided throughout the Borough. <b>Local plan objective O27</b> <b>Recommend</b> local plan will consider how the needs arising from new development, such as play space may be met through the provision of

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			necessary infrastructure and facilities. Consider whether existing SPG guidance on play space provision requires updating. Adoption of SPG - Planning Obligations.
98		<p>For a small child, Cheltenham has play areas, swimming pools and parks. For adults it has a variety of attractions, but for 12-17 year olds there is in fact precious little, they just want somewhere safe, away from parents where they can 'hang out' with their friends. The skate park in Pittville is ideal, but not everyone can get there without parents driving them. More such places would be desirable. There have been many requests for an ice rink which would be an excellent idea.</p> <p>How about youth centres?</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>The Council has no statutory responsibility to provide community facilities, this responsibility lies with Gloucestershire County Council. The local plan however, recognises the importance in providing for facilities and services which meets the needs of residents and visitors to the town in locations which are accessible by alternative modes of transport. The local plan, through its policies will seek to protect existing facilities from redevelopment where demand for their retention exists and support the provision of new of facilities where they meet local needs.</p> <p><b>Local plan objective O27</b> <b>Recommend</b> See ref. 83</p>
114		<p>Open spaces: very important in helping to clean the streets of skateboarders, bicycles on pavements etc. which are a danger to pedestrians. Perhaps specially constructed areas for skateboarders.</p>	See ref. 83
125		<p>More facilities for skateboarding, rollerblading etc. in parks and open spaces.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see</i></p>	See ref. 83
156		<p>More proper ramps for skateboarders please (open spaces).</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	See ref. 83
<b>energy efficiency/drainage</b>			
45		<p>Urban flooding can be caused by flash run-off in heavily paved town centres with no natural soak-away. Direct collection in surface water drains put excessive strain on the system.</p>	<p>The local plan will include policies which control the development of land which would increase the level of surface water run-off. Detailed drainage issues will be considered by the Council's engineering department when detailed planning applications are submitted.</p> <p><b>Local plan objective O30</b> <b>Recommend</b> update plan in response to PPG25. Preparation of SPG setting out information to developers on Sustainable Urban Drainage Systems (SUDs).</p>
188	1.6	<p><b>Cheltenham Civic Society</b> Support contribution which can be made through the design of buildings to reduce energy efficiency, and use of drainage systems which improve removal of surface water. But, legal framework required to cover options.</p>	<p>Comments noted.</p> <p><b>Local plan objective O16, O17, O30</b> <b>Recommend</b> update plan in response to PPG25. Preparation of SPG setting out information to developers on Sustainable Urban Drainage Systems (SUDs). New policy setting out Councils approach to SUDs - requirement placed on developers to consider SUDs solutions to removal of surface water.</p> <p>The Council has prepared advisory leaflets on</p>



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			sustainable buildings. These leaflets will be placed on deposit with the local plan in the Summer 2002, to be adopted as SPG.
240	1.6	<b>Cheltenham Conservation Area Advisory Panel</b> Support in theory but any proposals to change present surface water drainage system would mean major reconstruction throughout town. May not be appropriate if infill development becomes extensive.	The practicalities of applying SUDs solutions will need to be taken into account on a site by site basis. It is however important to note that simple SUDs features may be incorporated into small infill developments.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes Western)</b> Welcome sustainable approach to development and designing for energy efficiency and sustainable drainage systems. However local planning authority may need to produce supplementary planning guidance/codes of practice on these issues to ensure no undue delay in planning applications, which can result in unnecessary cost.	Comments noted <b>Local plan objective O16, O17, O30</b> <b>Recommend</b> supplementary planning guidance on sustainable drainage systems will be placed on deposit with the local plan during Summer 2002. The Council has prepared advisory leaflets on sustainable buildings. These leaflets will be placed on deposit with the local plan in the Summer 2002, to be adopted as SPG.
283		<b>Cheltenham Friends of the Earth</b> Support conservation areas and local listings, but wish to see active promotion of buildings which reduce impact on environment through reduced energy consumption and use of low impact materials.  Would welcome policies which actively promote low impact housing or developments, possibly with development of demonstration buildings and schemes. Council should obtain copy of 'Guide to Eco Buildings in Bristol and Bath' from Create Centre in Bristol. Would recommend policies which encourage developments to incorporate element of electricity generation. Support development of sustainable urban drainage.	See ref. 241.
284		<b>Gloucestershire Wildlife Trust</b> Trust is a strong proponent of SUDS and has worked closely with developers and other local authorities on schemes involving SUDS. We would welcome a policy making SUDS a requirement of all developments. It should also form the subject of a Supplementary Planning Guidance note.	See ref. 241.
<b>Issue 2 Housing</b>			
<i>general</i>			
287		<b>CPRE</b> Housing - commend this clear exposition, in simple language, of facts and implications of this core issue. Would not disagree with anything which paper has to say on matter.	Comments noted.
<i>provision</i>			
119		<b>Prowting Projects</b> It is now accepted generally that a 10% contingency allowance be built into new housing requirements. This would mean that 2,931 units are required. Secondly, in accordance with PPG3/para.34, a 5 year housing land supply needs to be identified explicitly. Hence, the emerging plan	The Council has sought to be robust in preparing the methodology for the Urban Capacity Study, taking into account dwellings lost to the housing stock and expiries of planning permission, thereby increasing provision of housing over the plan period from 2,390 to 2,665.

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		is deficient in identifying locations for 622, rather than 1,400 units.	<p>Whilst para 34 of PPG3 requires development plans to identify the first 5 years of housing development, it also requires sites to be identified which will realistically be implemented. The draft development strategy allocates a greenfield site to assist in meeting Cheltenham's housing requirements over the first 5 years.</p> <p><b>Local plan objective O5, O22</b>  <b>Recommend</b> in line with the governments approach to Plan, Monitor and Manage, the urban capacity study will be reviewed annually and adjusted accordingly to accommodate Cheltenham's housing needs. Adjustment to the study may include bringing forward sites phased for a later period of the plan, or identifying additional sites.</p>
129		<p><b>Gloucestershire Fire and Rescue Service</b>  The availability of the Fire and Rescue Service will also be influenced by the number of new homes created in the Borough. Greater numbers of people will inevitably lead to a greater demand for resources, the Fire and Rescue Service is no exception. Though difficult to quantify, I need to bring the issue to your attention at this stage.</p>	<p>Comments noted. Fire and Rescue Service will continue to be consulted on changes to local plan policies and proposals.</p>
169		<p><b>Oldfield King Planning</b> It is obvious there is major pressure for residential development in Cheltenham.</p> <p>There should be a policy which ensures that all housing schemes provide a fully integrated and seamless mix of housing types, sizes and tenures in order to achieve balanced communities. Such a policy would assist in negotiating affordable housing, but would also achieve a wider purpose within the framework of PPG3.</p>	<p>Comments noted.</p> <p><b>Local plan objective O5, O22</b>  <b>Recommend</b> in formulating revised housing policies the local plan will have regard to the Council's urban capacity study and PPG3 which address the provision of housing within Cheltenham. Housing provision during the plan period will be required, through integrated development to provide for inclusive communities.</p> <p>The local plan will incorporate findings of a housing needs survey prepared on behalf of the Council by Fordham Research. The housing needs survey sets out that the need for affordable housing is not being met in Cheltenham. The local plan will consider how this can be addressed through the planning process through the requirement of a proportion of affordable housing to be provided on sites providing over 15 dwellings.</p>
189		<p><b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b> Need within Cheltenham to provide dwelling units to meet County Structure Plan requirements therefore it is necessary for some sites to come forward early in Structure Plan timescales. Consideration should be given to sites that can be delivered early in plan process, especially if they are sustainable and comply with other local plan policies.</p> <p>Not considered that local planning authority identify sufficient land (both brown and greenfield) in order to satisfy new dwelling requirements, therefore acknowledgement should be given to those edge of town sites that are green but by virtue of the relationship</p>	<p>The urban capacity study has sought to be as robust as possible in identifying sites to meet Cheltenham's housing requirements. In line with the governments approach to plan, monitor and manage, the urban capacity study will be amended where appropriate. This may include bringing sites forward, or pushing sites back, should sites not previously identified which offer sustainable development solutions come forward through the plan period. In line with the provisions of PPG3 the presumption will be that previously developed sites should be developed before greenfield sites.</p> <p>In considering the deliverability of sites identified in the urban capacity study the Council has involved the House Builders Federation (HBF). These comments will be incorporated into a revised</p>

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		to existing amenities should be considered appropriate development sites.	<p>version of the study which will be placed on deposit with the local plan in Summer 2002.</p> <p>The draft development strategy allocates land for housing development (Policy PR1), including the allocation of greenfield land at New Barn Lane. Local plans need to identify sufficient land to meet the first 5 years of housing development proposed. Through the application of the plan, monitor and manage approach allocations will be reviewed and updated, taking into account the uptake of sites identified in the urban capacity study and windfall sites on previously developed and greenfield sites. It is therefore inappropriate at this time to allocate land for housing over and above Cheltenham's housing requirements.</p>
194	2.2  2.7	<p><b>Mason Richards Planning (on behalf of Bovis Homes)</b> support objective of ensuring Structure Plan housing requirement figures met within plan period.</p> <p>This paragraph is inadequate in guiding future Local Plan work. Correct to say sequential test should be applied, but not good enough to simply state that sites within urban area should come forward before sites on edge of town. Should be key issue that other sites need to be identified, at least in reserve, should anticipated shortfalls from urban capacity materialise. Point appears to be recognised in para 2.8 but needs to be more clearly stated in relation to para 2.7.</p> <p>Also need to make further reference to need to achieve quality development and to ensure general range of housing is provided in sustainable locations.</p>	<p>The urban capacity study identifies that a large proportion of Cheltenham's housing requirements can be met on previously developed sites within the urban area. In applying the principles of PPG3 the local plan will incorporate the findings of the urban capacity study through the allocation of land for development. The urban capacity study and the draft development strategy allocates land to meet the first 5 years of development. Future reviews of the urban capacity study will inform the local plan on the need to allocate additional sites to meet housing need over the plan period.</p> <p>In determining the location of new development the local plan will have regard to the findings of the urban capacity study, government guidance, sequential test, and sustainability criteria. In identifying sustainable development sites, assessment may also include consideration of sites on the periphery of the town which make beneficial use of land, reduce pressure on the wider countryside and the need to travel.</p> <p><b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O22</b></p> <p><b>Recommend</b> in meeting Cheltenham's housing requirements the local plan will have regard to the Council's urban capacity study and PPG3 which address the provision of housing within Cheltenham.</p>
228	2.8	Planning for phased release seems sensible, but make sure local people know plans in their own area.	<p>Comments noted.</p> <p><b>Local plan objective O5, O6, O7, O12, O13, O14, O22</b></p> <p><b>Recommend</b> the local plan is required to identify land to accommodate the first five years of housing development. Sites identified will be open to public consultation when the plan is placed on deposit Summer 2002.</p>
229	2.2	<b>Prestbury Parish Council</b> Number of properties to be built should not be absolute, but be based upon proven need.	The local plan is required to identify land to accommodate the level of new housing identified in the Gloucestershire Structure Plan. This housing provision was based on Government population and household forecasts. The review of the local plan will adopt the Governments approach to plan, monitor and manage. The Council will therefore monitor the number of homes provided during the

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	2.8	Against release of greenfield sites. 'Phased release' should occur only when no other options and sequential testing been carried out.	<p>plan period through an annual survey of residential land. The findings of this study will be reflected in future reviews of the Council's urban capacity study.</p> <p>The local plan is required to identify to allocate land to accommodate the first five years of housing development. Whilst brownfield sites may be identified for development, a number of issues may prevent them from being developed in the immediate future. In some instances greenfield sites will need to be allocated to make up the shortfall in housing provision.</p> <p><b>Local plan objective O5, O22</b>  <b>Recommend</b> urban capacity study will be reviewed annually and adjusted accordingly to accommodate Cheltenham's housing needs.</p>
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes Western)</b> Necessary for some sites to come forward early in Structure Plan timescales. Consideration should be given to sites that can be delivered early especially if they are sustainable and comply with other local plan policies. Welcome higher housing densities as way of seeking best use of land, but an indication should be given to development strategy that will need to emerge should brownfield sites not come forward in sufficient number during plan period. Acknowledgement should be given to those edge of town sites that might be green but by virtue of their relationship to existing amenities might be considered appropriate development sites.	See ref. 229.
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Issues Paper does not adequately reflect point made above in PPG3 in relation to green field land. Important to recognise that not all brown field sites will perform as sustainably as some green field sites and similarly not all urban green field sites will perform as sustainably as some edge of settlement sites (proximity to employment opportunities, sustainable transport facilities).	See ref. 229.
283		<b>Cheltenham Friends of the Earth</b> Would support supplementary planning guidance or planning policy which seeks to match housing unit size to needs. Would also support inclusion of policies regarding dedicated student housing. Policies need to encourage provision on suitable sites and define what would be unsuitable sites.	<p>PPG3 says that local authorities should adopt policies 'which take full account of changes in housing needs' based on assessments of local need. It also indicates that plans should encourage provision of housing to meet the needs of specific groups.</p> <p><b>Local plan objective O5, O22</b>  <b>Recommend</b> the review considers how best to meet identified housing needs in Cheltenham, including student housing.</p>
285	2.2	<b>PARC</b> Should Cheltenham's housing needs reduce because, e.g. a large employer leaves the town, then this reduction should be reflected in a revised lower requirements for new housing.	An analysis of Cheltenham's economy (Nov 2001) sets out that the town has seen an increase in economic growth since 1998 which has outperformed national growth. The report highlights some potential concerns to the economy through decline in the manufacturing and insurance sectors. The Council must consider this

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			information in creating opportunities within the town which will create new employment and sustain and enhance Cheltenham's economic growth. <b>Local plan objective O5, O19, O20, O22</b> <b>Recommend</b> consider findings of employment land report.
299	2.2	<b>RPS Chapman Warren (on behalf of Redrow Homes South West)</b> Approve of the need to grant planning permissions to meet Structure Plan requirements.	Comments noted.
305	2.1	Put causal factors of why new homes are needed in descending order of significance.	List of factors identifying need for new homes in Gloucestershire simply seeks to highlight key factors of change. Data on some of these factors will be difficult/or unavailable to collate at the local level. <b>Recommend</b> no change.
<b>greenfield development</b>			
35		Sufficient new development has taken place in Cheltenham, building on further green field sites should be avoided. If more offices and more green field housing is allowed, this will result in more property owners from places like London coming here and further pushing up house prices to the detriment of local people and the environment.	Gloucestershire Structure Plan requires provision to be made in Cheltenham Borough for 7,350 dwellings, and about 12 hectares of employment land between 1991 and 2011. Development on green field sites will only occur where there is a need that cannot be met on previously developed land. <b>Local plan objective O5, O6, O7, O12, O13, O19, O20, O21, O22</b> <b>Recommend</b> annual review of urban capacity study.
51		Stop building more houses on greenfield sites which erodes the countryside, play and sports areas.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	A strategic theme of the local plan is one of sustainable development. In terms of meeting housing needs over the plan period, the plan incorporates this theme together with guidance set out by Government which requires local authorities to make the best use of land, particularly previously developed land (brownfield). <b>Local plan objective O12, O13</b> <b>Recommend</b> incorporate findings of urban capacity study and assess available sites in response to annual review of study. Consider findings of Playing Pitch Strategy.
131		I am very sad to hear of the Starvehall Farm development, this is a beautiful area with lovely views which will now go. Use current buildings and town centre for housing, not the countryside nearby. This is what we love about Cheltenham - the countryside!	Comments noted. The allocation of land at Starvehall Farm reflects the findings of the urban capacity study which identifies a shortfall in brownfield land to accommodate Cheltenham's housing requirements. <b>Local plan objective O3, O6, O10, O13, O22, O23</b> <b>Recommend</b> development of land at Starvehall Farm will be guided by a development brief prepared by the Council. The objective of this brief is to bring forward imaginative development proposals which respect the character and form of neighbouring development, and sensitively reflects the openness and important views to the wider countryside whilst making efficient use of land.
190	2.7	<b>Vision 21</b> Would like this paragraph to be stronger in emphasising undesirability of building on such land.	Cheltenham Borough Council is required to accommodate housing requirements set out in Gloucestershire Structure Plan . In meeting this requirement the Council has applied the principles

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			of sustainable development set out in government guidance which requires local authorities to make the best use of land, particularly previously developed land (brownfield). In considering Cheltenham's housing need, the Council must also accept that need may not be wholly met through the allocation of brownfield sites. <b>Local plan objective O5, O6, O7</b> <b>Recommend no change</b>
193	2.4, 2.7  2.7, 2.8	<b>Countryside Agency</b> Pleased to note emphasis placed on sequential approach, with brownfield sites being earmarked for development prior to greenfield sites .  Paragraphs generally in line with approach adopted in Agency's policy document 'Planning tomorrow's countryside'. (Copy enclosed.)	Comments noted.
228	2.2  2.7	Appears only 2,665 dwellings needed between 2001 and 2011, which would appear to preclude need for further development in Green Belt. No more excuses enabling Green Belt development (eg Laxton Meadow).  Approve in exceptional circumstances, use of greenfield land within borough for housing/other suitable developmen rather than make use of green belt land.	Comments noted.
229	2.7	<b>Prestbury Parish Council</b> Support, with qualification that such developments should not damage environment and character of villages. Selection of sites must be based upon sequential testing against defined criteria not on a political basis.	Comments noted.
240	2.7	<b>Cheltenham Conservation Area Advisory Panel</b> Likely that infilling will meet only a proportion of development needs, but difficult to see what green field land is available within town apart from playing fields and other amenity areas. Major green spaces within town should be considered permanent and inviolable and new spaces should be created as part of any major development.	Comments noted. The allocation of land at Starvehall Farm reflects the findings of the urban capacity study which identifies a shortfall in brownfield land to accommodate Cheltenham's housing requirements. The site has been identified in accordance with provisions of PPG3, including application of sequential test approach and sustainability criteria. <b>Local plan objective O3, O6, O10, O12, O13, O18, O22, O23</b> <b>Recommend</b> development of land at Starvehall Farm will be guided by a development brief prepared by the Council. The brief will take into account the importance of open space, supporting biodiversity, as a resource for recreation, and to assist in the 'greening' of residential developments. Local plan will consider findings of playing pitch study.
272	2.7	Welcome policy to develop brownfield sites rather than greenfield land and also agree with policy to look at sites within urban area for development before edge of town sites. This policy should not go too far such that insufficient green spaces are left within the town. Calculate required figure by applying "Greenness Quotient" which would place Cheltenham in top 5% of English towns of its	Inappropriate to apply a blanket requirement for open space. The Council will require developers to consider the provision of open space at the design stage of development, taking into account open spaces which provide areas of public amenity, encourage and enhance wildlife, and provide opportunities for the incorporation of SUDs. <b>Local plan objective O3, O12, O18, O23</b>

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		size. In longer term will need to consider how any future expansion of Cheltenham should allow for incorporation of good-size chunks of parks and countryside within periphery of the town or whether it would be better to allow expansion to occur via satellite towns/villages.	<b>Recommend</b> revision of policy GP1 will enable the Council to require developers to prepare an environmental assessment and urban design appraisal of proposals. Information from these reports will assist the Council in determining requirements for open space. Where appropriate the Council will safeguard open spaces from future redevelopment.
278	2.7  2.9  2.8	<p>Definition of "major" required, size and density of sites in rural and 'greenfield' areas should either be given or cross referenced to a development schedule. The tight-packed development of urban areas would not be acceptable here.</p> <p>Government guideline re housing density is based on development densities in general. Document should contain guidance that is more Cheltenham specific. Also, more criteria required regarding intensification of existing residential areas to avoid over-development on new or infill sites.</p> <p>Phasing: this clause and all clauses appertaining to development of greenfield sites must be removed from draft proposal until a separate paper has been made available for consultation that deals solely with development and preservation of greenfield sites and the impact of such developments.</p> <p>Would be desirable for statement to be included of council's intent to preserve greenfield areas to recognise their importance. Without this, impression is that Cheltenham will rely on greenbelt of neighbouring authorities to provide the impression that it is maintaining greenfield policy.</p>	<p>Paragraph 2.7 sets out the principles of applying the sequential approach to development. The reference to the development of 'major' sites applies to potential development which may be required on greenfield sites to meet the shortfall in development which may not be accommodated on brownfield sites. The Council would not support ad hoc development of greenfield sites throughout the town, and would therefore apply a strategic approach in the identification of sites which applied sustainability criteria set out in PPG3.</p> <p>PPG3 requires local authorities to make the best use of land through increased housing densities. The application of higher densities will need to take account of the context of the built and natural environment. Innovative design assists in making better use of land, the Council will require developers to incorporate urban design principles and illustrate how higher densities may be achieved.</p> <p>Revised local plan will include policy on the phasing of development. Allocations and phasing schedule will be made available for public consultation when the plan is placed on deposit during Summer 2002.</p> <p><b>Local plan objective O2, O3, O5, O6, O7, O9, O11, O12, O13, O14, O22, O23</b></p> <p><b>Recommend</b> policy GP1 revised to identify the information which the Council will require to accompany planning applications, including an urban design appraisal and environmental assessment. Incorporate findings of urban capacity study and assess available sites in response to annual review of study, brownfield/greenfield phasing policy of local plan will be revised in accordance with future identification of sustainable brownfield sites. Consider findings of Playing Pitch Strategy.</p>
283		<b>Cheltenham Friends of the Earth</b> Object to release of greenfield land for development per se, but support strict phasing of any releases.	Comments noted.
285	2.7	<b>PARC</b> Would appreciate clarification of meaning of last sentence about priority being given to site within existing urban area before sites on edge of town.	Paragraph 2.7 reflects sequential approach to the identification of sites set out in PPG3. This approach requires local authorities to apply a search sequence, considering first the "reuse of previously developed land, then urban extensions, and finally new development around nodes in good public transport corridors".
287	2.7	<b>CPRE</b> Have noted that Development Strategy paper proposed one greenfield site. Would not object to this proposal, but make following comments:	The Council is required to allocate land to meet housing needs up to 2011, including the identification of sites to meet the first five years of the plan period. Whilst a number of brownfield





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		<p>the development of greenfield sites must be removed from draft proposal until separate paper has been made available for consultation that deals solely with development and preservation of greenfield sites and impact of such developments.</p> <p>Would be desirable for statement of intent to be included in local plan to preserve greenfield areas and recognise their importance. Incorrect to rely on cross-boundary considerations over which borough council has no control, to provide for future needs of borough. (Issue 9 also refers).</p>	<p>be delivered over the plan period, taking into account land use and ownership constraints. The Council will prepare a phasing policy which will be open to public consultation when the local plan is placed on deposit during Summer 2002.</p> <p>In identifying sites for development and considering new development proposals the Council will seek to make the best use of land, including the application of the sequential approach and sustainability principles. Where appropriate the Council will protect green spaces from development.</p> <p><b>Local plan objective O5, O6, O7, O9, O10, O12, O13, O14, O16, O18</b></p> <p><b>Recommend</b> review of the councils approach to linking open spaces within the town to create a strategic green network. Review of green spaces throughout the town. Annual review of urban capacity study.</p>
299	2.7	<p><b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Could be updated if council has confidence in its Urban Capacity Study.</p>	Comments noted.
<i>making best use of land</i>			
43		Answer to the question posed on page 6 "should we be doing more to encourage the reoccupation of empty buildings and to promote town centre living to help reduce our dependence on the car" is yes.	<p>Comments noted</p> <p><b>Local plan objective O7</b></p> <p><b>Recommend</b> the local plan will promote the re-use of previously developed land and buildings within the town.</p>
45		P6 - Run down (photo) - I hope the question is a rhetorical one. Empty buildings a) become unsightly b) are unpleasant to live near, rats, squatters, you name it. Local small traders should be encouraged, not intimidated by massive superstores, journeys to which take time, money and use fuel.	<p>Comments noted.</p> <p><b>Local plan objective O7, O19, O20, O25</b></p> <p><b>Recommend</b> see ref.43</p>
95		What has been done in the last few years in the Lower High Street is encouraging, although I do not see how small shops can survive in this day and age. Using available accommodation over commercial premises for housing is an excellent way forward. The council should learn from its mistakes as far as demolition of old buildings is concerned, the town can never really recover from the ravages of the 60s and 70s. The Victorian streets in the centre of town have survived and been improved, the quality of life appears to be quite desirable. I would like to see the council doing even more to improve the local amenities in what were once the poorer areas of the town.	<p>Comments noted.</p> <p><b>Local plan objective O7, O19</b></p> <p><b>Recommend</b> see ref. 43</p>
106	pg.6 Clarion	Encourage the re-occupation of empty buildings. Sights such as that illustrated are so sad, depressing and demoralising.	The Government requires local authorities to make the best use of land, particularly previously developed land, including the re-use of existing buildings. The urban capacity study prepared by the Council recognises the opportunities of empty homes and the upper floors of shops in providing

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			<p>an element of housing over the plan period. These sources however, often have a number of issues such as location and access which limit the resource available.</p> <p><b>Local plan objective O7</b> <b>Recommend</b> see ref. 43.</p>
108		<p>Improving private sector housing - If these houses have some architectural merit then they are probably worth restoring. The difference in cost between restoring and starting again must be an important consideration. It would clearly have a significant impact on Cheltenham's future housing requirement if these houses were brought back into use. It is therefore a very important issue.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>The local plan seeks to protect the quality of Cheltenham's buildings which make a significant contribution to the character and appearance of the town. Owners of properties cannot be assisted directly through the local plan, however the Council does provide grants to private landlords.</p> <p><b>Local plan objective O7</b> <b>Recommend</b> see ref. 43.</p>
132		<p>Great progress has been made in maintaining older business premises. Please do the same with private housing as suggested, it will also reduce dependency on cars. There are too many empty buildings at present.</p>	<p>Comments noted.</p> <p><b>Local plan objective O7</b> <b>Recommend</b> see ref. 43.</p>
137		<p>Acquisition, demolition and redevelopment or/and landscaping of derelict or neglected properties on A.4019 Swindon Road from its junction with Henrietta Street and Poole Way. Its an eyesore and shameful as an approach to the town centre.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Swindon Road/St. Margarets Road forms part of the Northern Relief Road. A number of derelict buildings along this route will be demolished to allow for the widening of this route. Gloucestershire County Council have indicated that works to this section of the Northern Relief Road will begin early 2002.</p> <p><b>Local plan objective O7</b> <b>Recommend</b> no change</p>
140		<p>Many older houses/Flats are not fit for habitation and an eyesore. It would be preferable to demolish these buildings and concentrate on building new economic and energy efficient homes - for affordable ownership and rent, private sector and through the council/housing associations. These areas need to be redeveloped, making them attractive places for people to live - including green spaces trees etc.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Comments noted.</p> <p><b>Local plan objective O6, O7</b> <b>Recommend</b> the local plan will promote the re-use of previously developed land and buildings within the town. Key Issues paper - Appraisal of existing policies identifies the need for the local plan review to consider the sustainability of existing and new buildings in terms of energy efficiency. The Council has prepared advisory leaflets on sustainable buildings. These leaflets will be placed on deposit with the local plan in the Summer 2002, to be adopted as Supplementary Planning Guidance..</p>
156		<p>Renovate more existing houses and make empty properties habitable.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Comments noted. See ref. 43.</p>
158	2.4	<p><b>Gloucestershire Constabulary</b> Support the recommendation for the use of previously developed sites within urban areas. Government guidance contained in PPG3 and RPG10 promote the maximum use of previously developed sites, and advises that</p>	<p>Comments noted.</p> <p><b>Local plan objective O6, O7, O9, O13</b> <b>Recommend</b> amend local plan policies to reflect PPG3. The local plan will promote the re-use of previously developed land and buildings within the town.</p>

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	2.9	<p>preference should be given to these sites over greenfield development.</p> <p>The constabulary supports the need for higher density development at appropriate sites. PPG3 encourages housing developments which make efficient use of land.</p>	
169		<p><b>Oldfield King Planning</b> Developing brownfield land can limit the scope for effective implementation of affordable housing. The slavish use of phasing policies can overlook the practicalities of delivering affordable housing within the funding constraints RSLs have to operate within. We would therefore expect some flexibility.</p> <p>It would be beneficial to include a specific policy encouraging the re-use of derelict buildings and land. This can be encouraged by tapping the potential of empty homes, applying greater flexibility on parking standards and looking for alternative uses for employment allocations, which have been vacant for many years and not been implemented.</p> <p>Building dwellings at higher densities means that more houses can be developed on a smaller area thus providing more scope for affordable housing. However, there needs to be recognition that car ownership levels is generally much lower amongst social tenants. Circular 06/98 states "local planning authorities should be flexible on car parking standards as car ownership rates are generally lower for occupants of affordable housing than for those of general market housing. This approach may make it easier for the developer to provide affordable housing".</p>	<p>The urban capacity study prepared by the Council recognises the problems and difficulties associated with the development of brownfield sites. The study has tried to be as robust as possible in applying assumptions to trend based data and identifying sites which may feasibly be developed during the plan period. The revision of the urban capacity study will monitor the take up of brownfield sites and will be updated accordingly to take account of changes in development patterns.</p> <p><b>Local plan objective O5, O6, O7, O22</b>  <b>Recommend</b> annual review of urban capacity study. The local plan, in taking account of the provisions of PPG3 and PPG13 will consider the application of flexible standards, such as parking standards, particularly in sustainable locations, close to employment, shopping facilities, social amenities and public transport.</p>
188	1.4	<p><b>Cheltenham Civic Society</b> Previously developed 'brownfield' land to mean just that and should not include previously undeveloped land which may be part of same overall area of land. 'Green Open Spaces' to be both private and public ownership.</p>	<p>Government guidance 'Tapping the Potential', includes within the category brownfield land, vacant land not previously developed. The definition provided for this source of brownfield is land identified as white land (land without any annotated land use). In determining this category within the urban capacity study the Council has included potential areas of other vacant land, such as allotments which potentially may be released to improve the quality of other such sites within the town.</p> <p><b>Local plan objective O5, O6, O7, O22</b>  <b>Recommend</b> no change. Any vacant land identified will be open to public consultation when the plan is placed on deposit during Summer 2002.</p>
	2.4	<p>Cheltenham Civic Society Development of brownfield land to be priority one, greenfield land priority two, with greenbelt land priority three. Strict compliance from the start should, given there be a reduction in housing</p>	<p>The allocation of land for development will be identified within the provisions of government guidance which requires local authorities to apply a sequential approach to the identification of sites. Only when there are no suitable sites within the</p>

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		requirement over time, ensure correct development is always environmentally acceptable regardless of falling demand which might otherwise leave prominent land unused	urban area will the Council consider sites on the edge of the town. In the assessment of potential development sites the Council will also need to apply sustainability criteria, such as access to local services and facilities, including provision of public transport and accessibility by pedestrians and cyclists.
214	2.4	<b>Railtrack</b> Support the maximum re-use of previously developed land in accordance with government guidance.	Comments noted.
228	2.9 2.10 2.11	Approve of making the best use of land wholeheartedly.  Careful consideration of higher densities. Agree This is very important.  See no advantage in identifying areas for high density housing. If any developer puts forward plans for affordable housing suitable for the site should be permitted. Likewise for expensive developments. However there must of course be some means of encouraging affordable housing to get enough built.	Comments noted. <b>Local plan objective O6, O7, O9, O13</b> <b>Recommend</b> amend local plan policies to reflect PPG3. The local plan will promote the re-use of previously developed land and buildings within the town.  Higher density housing will be considered in response to government guidance which requires local authorities to make the best use of land. Such guidance will apply to housing sites where high density may be appropriate through high quality design. Opportunities for high density housing is applicable not only to sites which may accommodate affordable housing. The Council, through the local plan will encourage the development of mixed communities.
229	2.4 2.9 2.10	<b>Prestbury Parish Council</b> Support re use of brownfield land  Danger that increasing housing density in infill areas will destroy character of existing built environment. Government guidance of not less than 30 homes per hectare should not be mandatory where its application would degrade character of surrounding properties.  Support the need to consider higher densities carefully.	Comments noted.  In certain locations high density development may be appropriate and may be implemented through high quality design and siting of development. Such development should be considered on a site by site basis, however the review of the local plan must consider how such development may be facilitated whilst protecting the quality of the built and natural environment. <b>Local plan objective O2, O3, O5, O6, O7, O11, O12, O22, O23</b> <b>Recommend</b> amend local plan policies to reflect PPG3. The local plan will promote the re-use of previously developed land and buildings within the town. Consider findings of Urban Design Framework.
240		<b>Cheltenham Conservation Area Advisory Panel</b> 'Brown field' sites: hardly appropriate to consider that Cheltenham offers very much land of this kind within its boundary - inappropriate to apply term to back gardens and other minor green spaces - could lead to destruction of urban pattern of town and general erosion of the environment for whole community. Infill sites however not always inappropriate if sensitively handled and right architectural solution offered.  To achieve this, vital that those administering precepts of Local Plan have a clear appreciation of objectives and do not use it purely as a checklist for administrative	Government guidance 'Tapping the Potential' identifies opportunities for intensification within urban areas, including areas such as garage courts, large back gardens, and backlands. In assessing the potential to develop previously developed land, the Council must take this source of development into consideration. The Council must however, also consider the limitations of this source, including impact upon the built environment, and loss of green spaces.  The second review of the local plan will set out a vision for the town, outlining how the Council and community would like to see the town develop. The objectives of the plan, together with detailed policies and proposals will seek to secure this

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	2.4	<p>purposes.</p> <p>With the 'Urban Design Plan' developing, the rigid formulation of the Local Plan at this stage could be premature.</p> <p>Also, demand for housing may well continue and some expansion of boundary has to be faced. However, major redevelopment of parts of the town will become inevitable, although the privatization of poorer areas of the town will make such redevelopment extremely expensive and difficult to achieve.</p>	<p>vision. The plan will be open to public consultation during Summer 2002 when the plan is placed on deposit.</p> <p><b>Local plan objective O3, O5, O6, O7, O11, O12, O22</b></p> <p><b>Recommend</b> amend local plan policies in response to findings of urban capacity study</p>
272	2.9-2.11	<p>High density development - would be worth considering whether to designate some areas of new build as 'low car ownership areas' which would involve banning or limiting car ownership within the area and making alternative transport schemes available.</p>	<p>Comments noted.</p> <p><b>Local plan objective O5, O6, O7, O35, O36</b></p> <p><b>Recommend</b> The local plan, in taking account of the provisions of PPG3 and PPG13 will consider the application of flexible standards, such as parking standards, particularly in sustainable locations, close to employment, shopping facilities, social amenities and public transport.</p>
283		<p><b>Cheltenham Friends of the Earth</b> Support development of mixed communities and of brownfield sites in preference to greenfield</p> <p>Support higher density development and in particular car free schemes. Would particularly welcome reference to car clubs to support car free development, and this could be included in Planning Obligations.</p> <p>To support higher density development as part of well designed schemes support increased use of partial basements as living space provided they have good natural light and healthy environments. These areas may also be useful as parking areas.</p> <p>Request a monitoring procedure for capturing information on dwellings over shops is introduced to better inform decision making process. May also be helpful if design guidance could be produced which may help developers overcome some of barriers to this form of development.</p>	<p>Comments noted.</p> <p>See ref. 272</p> <p>Agree. The Council currently has no mechanism to capture information regarding number of dwellings over commercial premises, other than where applications are received for changes of use. The Council will consider how this may be improved.</p>
284		<p><b>Gloucestershire Wildlife Trust</b> While sustainability arguments for focusing new development on brownfield sites are obvious, there are often biodiversity issues to consider. In many cases brownfield sites may have developed considerable biodiversity interest while greenfield sites (with a legacy of intensive agriculture) may be of little biodiversity value. Council will need to assure itself that any allocated brownfield sites are not of biodiversity importance. PPG3 (Annex 3) makes it clear when defining previously used land that sites which have developed a biodiversity interest should be excluded and "cannot be regarded as requiring development".</p>	<p>Comments noted.</p> <p><b>Local plan objective O18</b></p> <p><b>Recommend</b> review of urban capacity study will take into account biodiversity interest of potential brownfield sites. Review of local plan will seek to promote and enhance biodiversity, including policy requiring development to incorporate biodiversity opportunities - link to policy re: sustainable drainage.</p>

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287	2.4 - 2.6	<b>CPRE</b> Welcome conclusion that it should be possible to meet most of housing requirement for next ten years by using a variety of brownfield sites. Commend comprehensive explanation of methodology and results of Urban Capacity Study which have provided foundation for this conclusion. Concern is para 3.57 in Urban Capacity paper, which refers to possibility that GCHQ brownfield re-development scheme may not be completed by end 2011, leaving borough short of its housing requirement. Para concludes by saying that a further allocation of greenfield land may be needed to help meet housing requirements. This pre-supposes that unforeseen "windfall" sites will not emerge to bridge gap. Would prefer this latter possibility to be spelt out now, to pre-empt other arguments being put forward at the time.	In identifying potential to accommodate development on brownfield sites, the urban capacity study has taken into account windfall sites. Existing data on windfalls has been used to forecast potential development of large and small windfall sites over the plan period.  Consultation with GCHQ regarding development of the Oakley site has confirmed that development of the site will take place within the plan period. <b>Local plan objective O5, O6, O7, O9, , O12, O13, O14, O22</b> <b>Recommend</b> annual review of urban capacity study.
295	2.9	<b>Swindon Parish Council</b> Document should contain guidance on development density that is more Cheltenham specific. In addition, in 'Proposed Intensification of Existing Residential Areas' in the Urban Capacity Study, more criteria are required to ensure that over development does not take place on either new or infill sites.	Higher density housing will be considered in response to government guidance which requires local authorities to make the best use of land. Such guidance will apply to housing sites where high density may be appropriate through high quality design. <b>Local plan objective O6, O7, O11, O23</b> <b>Recommend</b> review local plan policies in response to PPG3. Consider findings of Urban Design Framework. Review urban capacity study.
299	2.6  2.8	<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Should be clearer about borough council's own target in relation to government objectives and relationship between 'the majority' of remaining housing requirement and those targets.  Illustrates inconsistency between PPG3 approach and objectives of plan-led system. Should try and ensure that any identified previously developed land is suitable for development in practice so that suitable amounts of greenfield land can be identified where necessary and so that as little change as possible is made in 'monitor and manage' part of process.	These paragraphs reflect findings of the urban capacity study. The study has sought to be as robust as possible in identifying sites for development and assessing ability of sites coming forward through the plan period. The Council is committed to the Government's approach to plan, monitor, and manage. The urban capacity study will be reviewed annually and phasing schedule amended accordingly. <b>Local plan objective O5, O6, O7, O22</b> <b>Recommend</b> annual review of urban capacity study
305	2.9	Prescription (normally 30 homes per hectare) cannot be applied to every individual site. Fails to differentiate between flats and houses. Conservation Area not normal context in which to decide appropriate densities.	See ref.295.
<b>affordable housing</b>			
57		Provision of low rent accommodation in pleasant areas for those on benefits essential.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Comments noted. <b>Local plan objective O22</b> <b>Recommend</b> incorporate findings of a housing needs survey prepared on behalf of the Council by Fordham Research. This survey sets out that the need for affordable housing is not being met in Cheltenham. The local plan will consider how this can be addressed through the planning process



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188		<b>Cheltenham Civic Society</b> Support key issue affordable housing	Comments noted
190	2.13	<b>Vision 21</b> Should be a more positive statement of intent to reduce threshold from 25 to 15.	See ref. 57.
228	2.12  2.13	Accepted way of the world. Do not have capacity in Cheltenham to house all workers, so let them commute, but with adequate (and eventually compulsory?) P&R schemes on every main road into town.  Agree in principal, but in areas of high housing costs developers can make more money from bigger exclusive units. Could mean that more expensive houses do not achieve their maximum sale value because of proximity of lower cost homes.	In considering housing needs over the plan period the Council must consider the ability of individuals to access housing suitable to their needs for those people wishing to move out of their family home, wishing to move to larger properties and those people wishing to migrate to the town to live. In promoting mixed communities, and reducing the need to travel the local plan will be required to enable development to take place which meets these needs. <b>Local plan objective O5, O6, O22, O35, O36</b> <b>Recommend</b> see ref. 57.
229	2.13	<b>Prestbury Parish Council</b> Affordable housing should be integrated into each development, otherwise young people will be unable to live in the area in which they have grown up and areas of deprivation will be created.	Comments noted. See ref. 228, and those relating to mixed communities.
240	2.12	<b>Cheltenham Conservation Area Advisory Panel</b> Provision of affordable housing probably essential to provide proper social mix. Any major developments should be prepared to incorporate these dwellings within fabric of development.	Agree.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon express concern over proposed threshold of 15 dwellings with regard to provision of affordable housing. Such a low threshold would further squeeze viability of developing previously used land where developer already addresses issues such as site clearance, or contaminated land.	See ref. 183
276	2.13	<b>David Wilson Estates</b> States that council can demonstrate special circumstances to reduce threshold for sites to provide affordable housing, at 15 units. This demonstration needs to be very clearly made, as provision of affordable housing at such low thresholds can materially affect viability of sites for housing provision. These thresholds, being lower than central government advice, are usually reserved for rural areas.	This requirement was brought about by the demonstrable: High development land prices and increasing lack of availability of brownfield development sites within Cheltenham's land locked borders, and demand for affordable housing comprehensively detailed in Housing Needs Survey (2000) <b>Local plan objective O22</b> <b>Recommend</b> see ref. 57
283	          2.3	<b>Cheltenham Friends of the Earth</b> Support aim of increasing social housing provision and lowering trigger level, however would like it to go further in terms of upper limit for the % of affordable units and by lowering threshold size for sites. Believe special circumstances apply in Cheltenham and therefore permission for this should be sought from Government.  Would like to see integrated developments where affordable and market housing provided in same scheme. Object to provision of social housing in neighbouring	Comment noted.          Already occurs.



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		boroughs to meet Cheltenham's housing need - works directly against objectives of plan to create sustainable communities or reduce travel needs.	Cross boundary strategic housing development, having concern for neighbourhood rather than local political boundaries, is now government and housing corporation policy.
286		<b>Robert Hitchins Ltd.</b> Generally supported as accords with Government guidelines. With regard to provision of affordable homes important that exceptional local circumstances are demonstrated and justified through local plan process before lower threshold is adopted.	See ref. 276.
287	2.13	<b>CPRE</b> Fully support principle that, as far as possible, housing policies should be designed to meet established housing needs. Would therefore support proposal to fix affordable housing threshold at sites of 15 homes rather than 25.	Comments noted.
294	2.12 - 2.13	Cheltenham will be turned into a very well off society to whom costs of living are irrelevant, coupled with a poorer society living in the 'affordable housing', such properties may well attach a stigma of their own. Is there any 'right' to be able to stay close to family, friends and job?	There is no 'right' to stay close to family, friends, and employment, but this is a priority in the creation of sustainable communities and is a priority consideration in the allocation of affordable accommodation in Cheltenham.
299	2.13	<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Stronger justification needed for any reduction in threshold for affordable housing.	See ref. 276.
<b>mixed communities</b>			
190	2.3	<b>Vision 21</b> Clear need for demographics of new housing need to be spelled out to developers in unequivocal terms. Need is for more smaller units of one and two bedroom accommodation. Developers want to build large houses. Local Plan will need to be clear on this point.	The Government sets out that everyone must have the opportunity of a decent home. To meet this objective the local plan must consider the ability of individuals living in the town to buy or rent a home. To inform the local plan the Council has appointed consultants to prepare a housing needs survey. This survey identifies that local housing needs are not being met. The review of the local plan will need to consider how these needs will be met through the planning system, through the provision of a range of housing type and tenure, and working closely with housing associations. <b>Local plan objective O22</b> <b>Recommend</b> the Council will consider how the local plan can implement the provisions of PPG3 through its housing policies, reflecting identified housing needs of Cheltenham.
229	2.3	<b>Prestbury Parish Council</b> Support creation of mixed and inclusive communities.	Comments noted.
<b>Issue 3 Employment</b>			
26		<b>Simon Pontifex &amp; Associates</b> Support site for new development behind Sainsbury's. This area would form a natural extension to the Kingsditch and Manor Park industrial areas. It is so important for any new site to be strategically and well located to the main transport corridors (M5). Otherwise allocation of a site say, on the east side of Cheltenham, would have difficult access to the motorway and could well prove unacceptable to occupiers.	The Council recognises the need to provide for employment uses over the plan period. Such provision should be identified in the most sustainable locations. Comments regarding development in the area of Kingsditch are noted, however such development would require amendment to the Green Belt boundary. <b>Local plan objective O19, O20, O21</b> <b>Recommend</b> the Council will seek to identify land for employment purposes to meet the needs of the town over the plan period.

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		The Kingsditch are is also well located to provide much needed employment (manual work) for the economic group categories D and E who live close by in areas where there are high concentrations of unemployment. Allocation in this location must win hands down on grounds of sustainability.	
119		<b>Prowting Projects</b> The LPA acknowledges the need for 12ha of employment land, but no proposals have been advanced by the council on where this requirement may be accommodated. Similarly, no recommendations have been made in regard to the Regional Assembly's edict that large strategic sites are required at Cheltenham. We submit that the area to the south-west of Swindon Village, including Manor Farm and Swindon Farm, should be examined for large-scale mixed use developments. Swindon Farm had been under active examination by IKEA. We consider Swindon Farm to be eminently suitable for IKEA's requirements.	See ref. 26.
158	3.8	<b>Gloucestershire Constabulary</b> Support the need to protect key employment sites within Cheltenham. However, it is important the Council recognises that some existing employment sites are better suited for alternative uses. Local Plan policies restricting loss of employment land should be site specific and reserved for key employment sites.	The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employments sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town. <b>Local plan objective O19, O20, O21</b> <b>Recommend</b> the Council will seek to identify land for employment purposes, including an assessment of existing sites to meet the needs of the town over the plan period, .
168		<b>King Sturge</b> It should be recognised that employment opportunities can come from a wide range of activities and the local plan should seek to ensure flexibility with regards to this. A range of uses which provide job opportunities should be allowed on employment sites.	The local plan will address the needs of the wide range of users and activities contained within the employment sector, including manufacturing, retailing, e-commerce, leisure and tourism, financial and business services, and public services. <b>Local plan objective O19, O20, O21</b> <b>Recommend</b> the Council will take account of the findings of the Economic and Regeneration Strategy, and report analysing Cheltenham's economy (2002) in reviewing employment policies of the plan.
169		<b>Oldfield King Planning</b> Include a policy giving special priority to housing that meets affordable housing needs in the re-use of redundant employment sites.	Recent developments in Cheltenham have resulted in a loss of employment sites through change of use to residential. The local plan will need to assess employment sites throughout the town in terms of their contribution to the economic vitality of the town. <b>Local plan objective O19, O20, O21, O22</b> <b>Recommend</b> the Council will take account of the findings of the Economic and Regeneration Strategy in reviewing employment policies of the plan. Any sites considered inappropriate for continued employment use will be assessed within the review of the urban capacity study.
181		<b>Cheltenham Chamber of Commerce</b>	Recent developments in Cheltenham have resulted

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		Concern about the pressures for residential development on brownfield sites and the possible loss of sites which could generate employment.	in a loss of employment sites through change of use to residential. The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employments sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town. <b>Local plan objective O19, O20, O21</b> <b>Recommend</b> see ref. 169
183		<b>Gloucester City Council</b> Urban capacity study clearly identified enough land to fulfil structure plan obligations with respect to housing. Concern however that there are no obvious sites for expansion of employment, leaving shortage that will put pressure on neighbouring districts. With respect to existing sites, you leave it open as to what level of protection these should receive. Would strongly suggest therefore that a far more restrictive policy be adopted. Also concern that small 'back street' employment sites that provide much of existing 'mixed use' development in more mature neighbourhoods will be lost as land values for residential use are so attractive. Danger that if employment issue not addressed there will be unreasonable pressure on sites outside borough and people will be increasingly forced to commute significant distances to find employment opportunities, adding to congestion, pollution and stress.	See ref. 169.
188		<b>Cheltenham Civic Society</b> Support key issue employment, the need to assess future employment needs and protection of existing sites.	Comments noted
194		<b>Mason Richards Planning (on behalf of Bovis Homes)</b> Requirement of 12 hectares identified but no sites currently identified. Therefore need to ensure full regard is paid to opportunities on edge of town to bring forward employment land in mixed use developments in sustainable locations.	The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employments sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town. <b>Local plan objective O19, O20, O21</b> <b>Recommend</b> the Council will seek to identify land for employment purposes to meet the needs of the town over the plan period.
201		<b>Tewkesbury Borough Council</b> Further information is needed on the detailed implications of the employment strategy, and particularly the location of any new employment allocations. The Borough Council would wish to comment on any potential new greenfield employment sites, such as white land or Green Belt locations.	See ref. 194.
222	3.9	I strongly agree that the Council should increase the degree of protection for sites in employment use, particularly to include offices in central locations.	See ref. 194.
228	3.2	Essential to have good quality compulsory	When identifying sites for employment the Council

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	3.3  3.6  3.7  3.9	<p>P&amp;R facilities on all main roads into town.</p> <p>Must have roads and other necessary structures in place to allow for this, including suitable sites for employment to develop.</p> <p>Any land released for employment must be in areas where it will not adversely affect local environment.</p> <p>'Business Land' must be situated to enable easy commuting.</p> <p>Agree. 'Exchanges' of designation should be made possible wherever appropriate and possible.</p>	<p>must consider a wide range of issues including accessibility (road infrastructure, and access by modes other than the private car), impact upon the environment, and opportunity for mixed uses.</p> <p><b>Local plan objective O11, O12, O16, O17, O19, O20, O33, O35, O36</b></p> <p><b>Recommend</b> the Council will seek to identify land for employment purposes to meet the needs of the town over the plan period. Amend local plan policies to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.</p>
240	3.6       3.8/3.9	<p><b>Cheltenham Conservation Area Advisory Panel</b> Provision of additional land for business users no doubt necessary, but it is hoped that council will take initiative in creating a unified development rather than the plotted and laissez-faire development which has marred the approaches of so many towns.</p> <p>Seems no reason why residential areas and places of employment should not be part of a mix in a new allocated area. Much of transport problem arising from distant segregation could be avoided or at least reduced.</p>	See ref. 228.
241		<p><b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon Homes would object to any policies in revised local plan that sought to retain existing employment sites in a blanket fashion. Many employment sites are historical yards found within residential areas which are often inappropriate for modern employment use but suitable for redevelopment for housing. Cheltenham currently lacks provision of a prestigious business park that would provide for a mix of uses. Local plan could act as a catalyst by identifying an area where a scheme of quality may be located within borough.</p>	<p>The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employment sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town.</p> <p><b>Local plan objective O19, O20</b></p> <p><b>Recommend</b> the Council will seek to identify land for employment purposes to meet the needs of the town over the plan period.</p>
273		<p>[Policy E1 of Structure Plan] 14 hectare shortage identified (including loss of existing employment land). Believe this allocation enables a balance to be struck between housing and the need for a choice of employment sites. Apparently no sites have been identified within Cheltenham Borough which I consider to be a major drawback in relation to future long term employment. Document does indicate that land has been lost for housing, leading to more out-of-town industrial and commercial parks, and admission that the impact on the shops in the town centre was not envisaged is welcomed. However even more units are envisaged on Tewkesbury Road, thus compounding the impact on the town centre.</p>	<p>Tewkesbury Road accommodates a number of retail units. Development of recent proposals in this area have been subject to sequential testing set out in PPG6. In adopting a sequential approach the first preference for development should be the town centre, followed by edge of town centre sites, district and local centres, and only then out of centre sites.</p> <p>The type of retailing located in the area of Tewkesbury Road significantly differs from retailing supported by the town centre, including the sale of bulky goods.</p> <p><b>Local plan objective O19, O20, O21, O24</b></p> <p><b>Recommend</b> The Council has appointed consultants to undertake a study of the health of the town centre</p>

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274	3.4, 3.8, 3.9.	<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Support recognition of importance of providing for and maintaining existing employment opportunities and of protecting existing employment land.	Comments noted.
278	3.6, 3.8, 3.9	These clauses are unacceptable and require greater detail to be included, eg whether 'best sites' inside or outside town, impact of sites on traffic management etc.	Comments noted.
279		<p><b>Town Planning Consultancy (on behalf of B &amp; Q Ltd.)</b> In addition to their existing store, B &amp; Q have an active requirement for a 'Warehouse' store in Cheltenham.</p> <p>It is noted that reference is made within the Key Issues paper to ensuring that policies for retail development and other related matters strengthen the retail function and attraction of the town centre, which is supported. The issues paper however makes no reference to quantitative and qualitative need. In particular, any study to assess retail need should consider the requirement for bulky good retail floorspace and specifically DIY floorspace. Independent research by verdict shows the growth in DIY expenditure in recent years exceeds 6%. Accordingly, given the lack of facilities within the locality there is likely to be a significant need for additional DIY floorspace over the plan period.</p> <p>B &amp; Q are currently supporting a proposal for one of their Warehouse stores, on land at Grovefield Way. The site is both available and suitable for such development. Indeed extant planning permission for retail development already exists on the site and this should be considered over and above other sites. The use of the site for housing does not reflect the current proposals or extant planning permissions. According reference to the site in the urban capacity study as being suitable for housing is inappropriate at this time pending the consideration of the current retail proposal for the site.</p>	<p>Comment noted.</p> <p>The Council has appointed Donaldsons to prepare a town centre study which will include a review of retail capacity in the town for the period to 2011, covering convenience, comparison and bulky goods.</p> <p>This planning application has now been now submitted. Without prejudice to the assessment and determination of this application, the site will be deleted from the Urban Capacity Study as a potential housing site, reflecting the land owner's intention to pursue an existing planning permission for retailing.</p>
283	3.46	<p><b>Cheltenham Friends of the Earth</b> Surprise that Regeneration Strategy (1996) not being formally reviewed as part of LP review. Not clear how Economic Development and Regeneration Strategy has fed into LP.</p> <p>Would welcome policies which support more sustainable use of employment land, eg decent bus service. Such policies could also be addressed through S106 agreements. Suggest number of jobs per hectare of employment land may be a useful indicator. Object to special consideration given to car</p>	<p>The Regeneration Strategy is being reviewed in conjunction with the local plan. Those parts of the strategy which remain relevant and are still to be implemented will be incorporated into the local plan. The plan will also take account of 'Cheltenham: its economy, its future' and subsequent updates.</p> <p>Sustainability is a strategic theme of the local plan and a key objective in making the best use of land, including the consideration of access by modes of transport other than the private car. In considering development proposals the Council will apply accessibility criteria set out on RPG10.</p>

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		<p>showrooms in existing policy EM67 as these contribute little to local economy or wellbeing of town.</p> <p>Would like to see introduction of environmental analysis requirement on all employment proposals and preference given to options which offer a positive environmental impact.</p> <p>Support decision not to allocate 12 hectare site for employment uses and protection of existing employment sites where this represents most sustainable use of land.</p>	<p>Policy EM67 of the adopted local plan provides criteria for the consideration of car showrooms. This policy recognises that such uses are inappropriate in certain locations. EM67 therefore provides for the development of such use on industrial estates.</p> <p>Policy GP1 revised to identify the information which the Council will require to accompany planning applications, including environmental assessment.</p> <p>Structure Plan sets out an indicative requirement to provide 12 ha of employment land over the plan period. The Council needs to consider whether sites are available to accommodate this allocation and whether such sites are required to support a diversified and sustainable local economy.  <b>Local plan objective O19, O20, O21</b>  <b>Recommend</b> consider findings of economic development and regeneration strategy. Identify land for employment purposes to meet needs of the town over the plan period.</p>
286		<p><b>Robert Hitchins Ltd.</b> Important that a view is taken as soon as possible whether sufficient land for new employment can be allocated within borough so that, if necessary, sufficient employment land can be provided in Tewkesbury borough.</p>	See ref. 158.
287	3.5 - 3.9	<p><b>CPRE</b> Would not disagree with what these paragraphs say about new and existing employment sites, but feel this part of issues paper is one of less satisfactory sections because, having analysed the situation, it does not indicate what approach might be. Therefore hesitate to comment further, other than to remark that employment land is obviously a key part of the local plan because it is an intrinsic part of housing and transport scenario. Recognise that skilled labour is in short supply, that town is nevertheless comparatively prosperous, that part of traffic problem stems from significant net "import" of daily commuters (ref para 3.2) and that in practice seems to be no spare greenfield land to satisfy business community's perceived demands. CPRE's conclusion is that Cheltenham has reached its limit for sustainable economic growth and expansion, other than by increasing "added value" of existing commercial activity, ie we do not believe the case for further economic expansion within the confines of the borough has been made.</p>	See ref. 158.
295	3.8  3.9	<p><b>Swindon Parish Council</b> Implies loss of employment land and increase in number and size of out-of-town industrial and commercial parks an oversight.</p> <p>Does not outline whether 'best sites' are</p>	See ref. 158.

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		<p>inside or outside town. If around existing out-of-town sites will exacerbate problems highlighted in para 3.8. In addition, para 3.6 mentions the need to identify 12 hectares of employment development sites, which would create a major visual and environmental impact if on a single site.</p> <p>These paragraphs are unacceptable and require greater detail to be included.</p>	
299	3.8	<p><b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Given shortage of new sites in urban area, tight administrative boundary and constraints imposed by greenbelt and AONB seems probable that any major strategic site will need to be beyond administrative boundary in Tewkesbury Borough but well related to main urban area. Local Plan must deal with this issue.</p> <p>In light of acknowledged loss of some existing employment sites, and difficulties of identifying new land for employment, disappointing that issue of balance between housing and employment not discussed here. Urgent attention must be given to issue of how housing and employment development to be balanced in sustainable way.</p>	See ref. 158
300		<p><b>Town Planning Consultancy (on behalf of Costco Wholesale UK.)</b> [Representation on behalf of Costco Wholesale UK] [Summary]</p> <p>BACKGROUND [Significant amount of documentary evidence to support case supplied as part of representation]</p> <p>Costco Wholesale operates a chain of membership warehouse clubs and is currently reviewing potential of Cheltenham area to establish a warehouse club. Warehouse clubs relatively new phenomenon in UK, and as a result provision for their development rarely made within local plans. Warehouse clubs been determined to be a sui generis use, rather than class A1 retail use.</p> <p>Representation seeks a revision to the description of uses suitable for land allocated for employment uses and to promote a criteria based policy for assessment of warehouse club applications. Costco serves needs of the small business owner. Not open to public, membership restricted to businesses and to certain individuals who fall within specified work or professional groups. Size requirements usually rule out town and edge of centre sites, however if large enough town centre site were found, unlikely that council would wish to see site developed for a warehouse club. Employment benefits of Costco development twofold. It supports and nurtures small businesses, adding to vitality</p>	<p>PPG6 recognises warehouse clubs as a new form of retailing , but states that they 'often share many of the characteristics of very large retail outlets, in which case they should be treated . . . as if they were retail businesses.'</p> <p>The Council has commissioned Donaldsons to prepare a town centre study which will include an assessment of retail capacity up to 2011. If capacity exists for this kind of retailing, the Council will need to consider if specific provision should be made for it. In view of the shortage of land in the Borough for B1, B2 and B8 uses, and the difficulty of identifying further sites for these uses, the Council is unlikely to accept that land which is currently designated for these uses would be acceptable for retailing. To do so would reduce opportunities for B1, B2 and B8 uses, and restrict job and economic diversity within the town.</p> <p><b>Local plan objective O19, O20, O21, O24</b>  <b>Recommend</b> the local plan review takes account of the findings of the Donaldsons study.</p>

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		<p>and viability of town and local centres where small businesses generally located. Generates direct employment in warehouse.</p> <p><b>PROPOSED MODIFICATIONS TO LOCAL PLAN</b></p> <p>It is proposed that the Cheltenham First Deposit Draft includes a description of uses suitable for employment land to take into account employment uses that fall outside of the traditional B1, B2 and B8 use classes. The description should encourage flexibility in line with PPG4. Suggested wording as follows:</p> <p>"Employment land is defined, for the purposes of this plan, as land which is allocated, or available, for employment uses within Classes B1, B2, B8 and closely related uses not falling within a use class - Sui Generis (uses such as warehouse clubs, cash and carry businesses, builders merchants, haulage yards, bus garages and MOT testing stations), but which are commonly found in industrial estates. Car sales are not an employment use, but may be ancillary to car repairs."</p> <p>This amendment will ensure that a range of employment uses is encouraged to provide for employment, choice, flexibility and competition.</p> <p>However if council feel further clarification required, then it is requested that a criteria based policy be included within the Employment chapter by which an application for a warehouse club could be assessed. [Examples of similar policies used in other locations around country enclosed]. Suggested that following policy wording be included in Cheltenham plan:</p> <p>"Applications for warehouse clubs will be permitted provided that:</p> <ul style="list-style-type: none"> <li>- the applicant can demonstrate that there is a need for the proposal, and</li> <li>- a sequential approach has been taken to site selection, and</li> <li>- there will be no detrimental effect of the vitality and viability of surrounding town centres, and</li> <li>- the development would not adversely affect residential amenity or highway and traffic conditions." </li></ul>	
305	3.6	<p>Not made clear if these two mentioned of "12 hectares" same. Additional employment land should be partly at Staverton. More sustainable to site more employment to west of Cheltenham as this is principal commuter route into town.</p>	<p>Cheltenham must look to provide employment land within its boundaries in sustainable locations. See ref. 158.</p>
307	3.9	<p><b>GCHQ</b> This suggests that the "adopted local</p>	<p>Comments noted.</p>



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		<p>plan seeks to ensure that many of the best sites in employment use are not developed for other uses.” It is suggested that the Review Local Plan will need to consider “whether this degree of protection should be maintained, given the competing need to provide for housing requirements.”</p> <p>Consistent with government guidance, GCHQ consider that, in examining future housing and employment land supply, local authorities should consider the likelihood of the land coming forward within the plan period and that only available employment land should be protected in the emerging local plan. The protection of the two Benhall plots that have outline planning permission for employment uses has the potential to over-estimate the available supply of employment land in the borough. Local plan policies should identify employment land that is suitable, deliverable and available, much in the same way as housing land is allocated and brought forward for development. The wording of paras 3.17 and 4.09 of the Draft Development Strategy should reflect the need to provide (allocate) a range of available sites to meet broader economic objectives.</p>	
<b>Issue 4 Built and Natural Environment</b>			
<i>design</i>			
24		<p>Whoever allowed Century Court in such a sensitive area of the college should be sacked.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report ‘other comments’.</i></p>	<p>The design concerns of Century Court were carefully considered by the Council's Planning Committee.</p> <p><b>Local plan objective O2, O11</b>  <b>Recommend</b> amend local plan polices to reflect principles of the Urban Design Framework. Where appropriate the Council will consider advice from design groups when considering design proposals. i.e. the Commission for Architecture and the Built Environment (CABE), Cheltenham Civic Society, and Architects Panel.</p>
25		<p>The appearance of Cheltenham would be improved by the removal of monstrosities such as the Millennium Restaurant and the Eagle Star building which when entering the town from the Gloucester end, blocks an attractive view of the hills and church spires. It also sticks out like a sore thumb.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report ‘other comments’.</i></p>	<p>Comments noted.</p> <p><b>Local plan objective O2</b>  <b>Recommend</b> N/A</p>
35		<p>Care should be taken when giving permission for brownfield sites, to ensure new buildings blend more sympathetically with the old. Century Court would have blended better if the walls had been a stone colour.</p>	<p>The development of brownfield sites need to be carefully considered to ensure that the quality of the urban environment is protected.</p> <p><b>Local plan objective O2</b>  <b>Recommend</b> amend local plan polices to reflect principles of the Urban Design Framework</p>
57		<p>Careful planning on brownfield sites which does not diminish local ambience.</p>	<p>See ref. 35.</p>

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		<i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	
118		No more appalling buildings like Century Court. Whoever permitted its plans should be shot. It will look even worse in a couple of years when it becomes shabby.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	See ref. 24.
125		Stricter selection of design of new buildings, no more Millennium restaurants please  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	See ref. 24
126		I always walk the 1 mile to town, but I am worried about the development of the Portland Street car park. At the moment there is a feeling of openness with a good view. The large building on the other side of the street was built much too near the road closing everything in and now stands empty. Would these houses be well set back with green verges. What happens to all the cars? This car park is always full.	Comments noted <b>Local plan objective O2, O3, O7, O11, O23 Recommend</b> the local plan will consider the findings of the Urban Design Framework when reviewing design policies. Where appropriate the plan will provide detailed guidance on townscape criteria to be applied to proposals for development. Policy GP1 revised to identify the information which the Council will require to accompany planning applications, including an urban design appraisal and design statement. Detailed design issues will be considered for land at Portland Street when any future planning application is submitted to the Council for consideration.
157		The ambience of Cheltenham has much to do with its architectural inheritance. It is difficult to understand how planning permission could have been granted to obscenities such as Century Court and the Millennium Restaurant at the same time as the sympathetic completion of Imperial Square. Bath by comparison has understood the problem and has retained its dignity. We now have three examples of ill considered and tasteless buildings which do nothing to enhance the ambience of the town, ie the development in the High Street on the site of Pates School, the Millennium Restaurant and Century Court. Unfortunately we have to live with these horrid mistakes but surely there can be guidelines to avoid them in the future.	See ref. 24.
169		<b>Oldfield King Planning</b> We support and encourage high quality architecture and innovative urban design within new development. RSLs are at the forefront of ensuring that the housing stock of the future is both, of the highest quality and sustainable. The local plan should offer flexibility in the application of policies to facilitate innovations.	<b>Local plan objective O2, O3, O4, O11, O23 Recommend</b> the Council will consider the findings of the Urban Design Framework when reviewing design and built environment policies of the plan. The Council will favourably consider innovative design solutions in appropriate locations which make the best use of land.
170		<b>Pitville Area Residents Association</b> Pitville is under threat from developers with no interest in the historic heritage of the area. Emphasis must be on good design. Support reuse of derelict land. The Council should	The local plan recognises that the Regency architecture of Cheltenham is a major asset to the town, however modern/innovative building design may be appropriate in certain locations. The plan therefore encourages the development of

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		have a clear vision for the design of new buildings. Consulting people beforehand may avoid permanent and hated disasters. Trees soften the aspect of buildings and give the town a welcoming and human feel.	innovative buildings which illustrate high quality urban design. Where appropriate the Council will consider advice from design groups when considering design proposals. i.e. the Commission for Architecture and the Built Environment (CABE), the Architects' Panel, and Cheltenham Civic Society. In addition the Council will work with local communities in preparing character assessments of areas of the town. <b>Local plan objective O2, O3, O4, O9, O11, O12, O23</b> <b>Recommend</b> the Council will consider the findings of the Urban Design Framework and the 'Urban Tree Strategy' when reviewing design and built environment policies of the plan.
188	4.1	<b>Cheltenham Civic Society</b> Dangerous ground, 'quality' is the key not 'restriction'.	The objective of the Urban Design Framework is to illustrate how urban design may be implemented into development proposals, it does not seek to predetermine future design of development. The findings of the Framework will be used to review design and built environment policies of the local plan, considering whether existing policies provide developers with the appropriate level of guidance, or whether the Council needs to provide greater direction in the design of development appropriate to the town. <b>Local plan objective O2, O3, O4, O11, O23</b> <b>Recommend</b> the Council will consider the findings of the Urban Design Framework when reviewing design and built environment policies of the plan.
222	4.1	Regarding guidelines for design, a specific requirement should be included in the Local Plan Review to promote diversification of architectural styles and materials in the High St in order to preserve its varied mediaeval burgrave plot based character.	The High Street falls within the Central Conservation Area. Local plan conservation and listed buildings policies will therefore apply. <b>Local plan objective O11</b> <b>Recommend</b> historic plot width should be respected and a policy in the local plan is one way of doing this. This will be considered in the review of the conservation policies.
239	4.1	Council needs to consider design matters far more closely. Fact that Cheltenham is on Council for British Archaeology List of National Historic Towns and is accepted as one of a small number of architecturally interesting towns in England gives planners more discretionary planning powers. They should exercise their additional latitude, but persons responsible should also be capable of selecting what is worthy amongst the unlisted.	Comments noted. <b>Local plan objective O2, O3, O4, O11, O23</b> <b>Recommend</b> the Council will consider the findings of the Urban Design Framework when reviewing design and built environment policies of the plan. The Council are preparing a list of locally important buildings. Review of local plan will recognise the value buildings included on the local list of Cheltenham have upon the quality of the built environment and seek to protect these buildings from inappropriate development.
240	4.1	<b>Cheltenham Conservation Area Advisory Panel</b> attempts to provide a straitjacket for the future - dangerous - leads to 'yardstick' planning. Quality needed, not only in design, but in Council's administration	See ref. 188
288	4.1-4.3	<b>English Heritage</b> We endorse the proposed approach and agree that the issues identified in the report do need to be addressed. We would be happy to advise informally on the development of proposed policy if that was thought useful.	Comments noted.

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	6.4	Urban design is particularly important in Cheltenham, a settlement of extremely high architectural quality. It is important to create straightforward but strong design policies that protect the character of the settlement whilst encouraging the very best contemporary architecture when new development takes place.	
<i>protection of the built environment</i>			
22		<p>What annoys me is seeing new buildings such as Century Court being erected in what was once a fine Regency town. People talk about losing their identity or aspects of their culture, well Regency buildings are part of ours! How can the council justify the building of such ugly buildings opposite such wonderful as Cheltenham College? Its not even affordable housing! Who are you trying to please here? Not Cheltenham residents.</p> <p>Cheltenham should have a policy that any new structures built must be of Regency style, eg housing erected at corner of Bath Rd/London Rd - congratulations to the architect. Monsters such as Century Court and the new GCHQ complex are an eyesore and make me want to move out of town. Residents should always come first, if planners don't like it - tuff!</p> <p>Our once wonderful and splendid shop fronts are being lost. Cheltenham should be known throughout the UK for its wonderful buildings, as it used to be. Lets reverse the decline while we still can. Not practical? - Of course it is and the benefits would be threefold. The GCHQ complex is not a 'gateway' as Carillion sold it, but a trap door leading to further decline of rural and urban qualities - that which the council are keen to conserve! Designs like the new MI6 building in London would have been far more aesthetic and in keeping.</p>	<p>The Local plan recognises that the Regency architecture of Cheltenham is a major asset to the town, however modern/innovative building design may be appropriate in certain locations.</p> <p>The design concerns of Century Court and GCHQ were carefully considered by the Council's Planning Committee.</p> <p><b>Local plan objective O2, O11</b>  <b>Recommend</b> amend local plan polices to reflect principles of the Urban Design Framework. Where appropriate the Council will consider advice from design groups when considering design proposals. i.e. the Commission for Architecture and the Built Environment (CABE), Cheltenham Civic Society, and Architects Panel.</p>
24		<p>The northern route (Swindon Rd/St. Margaret's Rd) is a mess with buildings derelict for years. The road is also too narrow.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Swindon Road/St. Margaret's Road forms part of the Northern Relief Road. A number of derelict buildings along this route will be demolished to allow for the widening of this route. Gloucestershire County Council have indicated that works to this section of the Northern Relief Road will begin early 2002.</p> <p><b>Local plan objective O36</b>  <b>Recommend</b> no change</p>
95		<p>Surely where properties in conservation areas are neglected, the council has some powers to intervene before they become derelict? An eyesore in the conservation areas are the neglected hedges on the boundaries. Originally they would have been elegant railings, but now they are brambles. Perhaps the Parks department could give advice and</p>	<p>The Council may only intervene where available legislation allows. Legislation protects buildings which have listed building status. Where buildings are not listed and are not in a conservation area the Council has limited powers. However, the Council has prepared a local list of buildings of architectural and historic significance. Owners of properties cannot be assisted directly through the</p>

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		put pressure on owners to maintain their hedges properly?	local plan, however the Council does provide grants to private landlords. <b>Local plan objective O11</b> <b>Recommend</b> recognise the value buildings included on the local list of Cheltenham have upon the quality of the built environment. Protect these buildings from inappropriate development.
106		With regard to housing, I believe in retaining the character of the town, in restoring existing buildings, not demolition. The history of a town as seen through its buildings can be an increasing source of interest. Assist owners of private homes to keep them in good condition.	<b>Local plan objective O11</b> <b>Recommend</b> see ref. 95. Restoration of buildings will have financial implications.
114		Regeneration of run down areas.	Comments noted.
116		Like other towns and cities throughout the UK, the social fabric has undergone radical reform. Whether for the better, depends on one's outlook. One cannot simply reinstate architecture already destroyed for sake of 'progress'; happening even today with an impending fight to keep a prime example of a mid-Victorian school on Hatherley Lane.	Comments noted. <b>Local plan objective O11</b> <b>Recommend</b> consider the findings of the Urban Design Framework in reviewing policies and proposals which relate to the quality of the built environment of the town.
170		<b>Pittville Area Residents Association</b> Pittville is a special area, with its own character which influences the way Cheltenham as a whole is perceived by visitors and residents. Open spaces, elegant views and buildings are keys to this perception. These features should be protected from development, they are assets to the town.	Areas such as Pittville offer sustainable locations, close to the town centre, public transport and open spaces. Urban Design Framework recognises the important role which the area of Pittville plays in attracting people to live in and visit the town. The Framework sets out that whilst such areas should be protected for their important contribution to the built environment, opportunities for redevelopment may still arise.  Development within conservation areas should seek to reflect existing densities and reinforce the special characteristics of the area. PPG3 sets out that "considerations of design and layout must be informed by the wider context, having regard not just to any immediate neighbouring buildings, but the townscape and landscape of the wider locality". <b>Local plan objective O11</b> <b>Recommend</b> amend built environment policies to reflect PPG3. consider the findings of the Urban Design Framework in reviewing policies and proposals which relate to the quality of the built environment of the town.
188	4.2	<b>Cheltenham Civic Society</b> Welcome, but further discussion on detail would be appreciated prior to official designations of area.	The review of conservation areas is being undertaken by the Heritage and Conservation department of the Council. Where this review identifies a need for new designations, or amendments, public consultation will be undertaken.
	4.3	General support - protection requires strong legal framework without which all is lost.	Buildings of local importance do not have the legal protection afforded to statutorily listed buildings. However, PPG15 sets out that local authorities may formulate local plan policies for their protection. <b>Local plan objective O11</b> <b>Recommend</b> the Council has prepared a list of buildings of local architectural or historic

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			significance, the local plan will seek to secure their retention.
228	4.2  4.3	Support review of conservation areas with respect to making sure that the right areas are protected, and some that are less important are de-restricted.  Listing of local buildings which make a significant contribution to local character should not be abused. should not be abused.	Comments noted.
240	4.2  4.3	<b>Cheltenham Conservation Area Advisory Panel</b> Until present conservation areas thoroughly analysed and guidelines laid down for future administration, adding further areas should be avoided.  No doubt that there is a case for protection of certain buildings. Creating a conservation area for such groupings might be practical way of doing this. However merit of retaining these buildings needs careful consideration - all towns evolve and Cheltenham must be sufficiently flexible to allow for change to bring it into the 21st and 22nd centuries.	Review of built environment policies of the local plan will take into account conservation area review. This review has carefully analysed potential areas for designation, including consultation with local communities. The local plan will also have regard to the listing of locally important buildings. <b>Local plan objective O11</b> <b>Recommend</b> amend local plan polices in response to findings of Urban Design Framework. Consider list of buildings of local architectural or historic significance, and how these buildings can be protected from inappropriate development.
245		Thanks and appreciation for those Council employees who restore and maintain such [Regency and Victorian] Council properties and for the Council who vet architects and constructors who are now infilling with buildings of taste, quality and sympathy for older Cheltenham style.  Plethora of signs: ugly garish sign boards over shop fronts' advertisements, even pavement signposts without signs.  Swindon Road with its congestion, deplorable carriageway surfaces, bleak and decaying buildings.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Comments noted.  The Council are aware of the impact which street furniture has an impact on the quality of the built environment. The Council has adopted supplementary planning guidance on the design of shop fronts, adopted a policy for 'Materials and Street Furniture on the Highway', and are working towards the removal of A-boards from the town centre. <b>Local plan objective O11</b> <b>Recommend</b> amend local plan policies to take account of Council initiatives to control street furniture and signage within the town. Consider whether controls need strengthening to maintain and enhance the quality of the built environment.  Swindon Road/St. Margaret's Road forms part of the Northern Relief Road. A number of derelict buildings along this route will be demolished to allow for the widening of this route. Gloucestershire County Council have indicated that works to this section of the Northern Relief Road will begin early 2002. <b>Local plan objective O36</b> <b>Recommend</b> no change
272	4.2	Conservation areas: there is a part of Leckhampton along Church Road that has a high density of interesting and attractive houses, including the church and rectory and several thatched houses. This would make a	Conservation areas are currently under review. Amendments to boundaries, and identification of new conservation areas will be incorporated into the review of the local plan.



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285	2.6  4.2  4.4	<p><b>PARC</b> Introduction 2nd para should contain a specific reference to the Conservation Areas and listed buildings.</p> <p>Understand that Conservation Areas take up some 20% of town's area. In order to keep Cheltenham's regency parklike environment, shouldn't the policies be aimed at building required dwellings in 80% that is not conservation area?</p> <p>Understood that decisions about conservation areas had already been made.</p> <p>Not not enough protection apparently for grounds of Benton &amp; Ireton. (Remove from schedule of large sites - see UCS Appendix 2)</p>	<p>See ref. 282.</p> <p>Conservation areas currently under review. Changes will be incorporated into review of local plan.</p> <p>Site removed from urban capacity study in response to refusal of planning application.</p>
292	4.3	<p><b>Gloucestershire County Council</b> Government guidance and structure plan provide clear advice on historic environment. This policy area is not well covered in this paper and, in particular, needs to be clearly articulated in sections on the built and natural environment.</p> <p>Proposal to deal with issue of unlisted buildings in local plan is welcomed.</p> <p>Section makes no reference to archaeology and the historic environment in general. Archaeology will be an issue in the development of sites both within urban area and on its periphery, notably historic core of Cheltenham and Prestbury.</p>	<p>Comments noted. Review of local plan will take account of Government guidance and Gloucestershire Structure Plan.</p>
305	4.2	<p>Protection for unlisted buildings already achieved by adopted version of Policy HS73. Instead of throwing this gain away, retain the relevant two clauses.</p>	<p>Comments noted.</p>
<i>environmental enhancement</i>			
27		<p>Mr John Webster, Ms Janet Dore and the three councillors for the Central Area are all aware of the 'vision' for the future of St. Mary's Church (proposed by the Parochial Church Council).</p> <p>VISION: St. Mary's could take on an expanded role and become a centre for the community. This change of use together with the councils own proposals for improving the churchyard will help to answer the problems highlighted in the Clarion (pg.3).</p>	<p>Adopted local plan recognises the contribution which St Mary's Church makes to the built environment and recognises the need for environmental improvements. The review of the local plan will continue to promote this area and seek to identify works to improve the quality of the open space.</p> <p>In regard to expanding the role which the church plays within the community, this is not really a matter which can be dealt with in the remit of the local plan.</p> <p><b>Local plan objective O11, O12</b> <b>Recommend no change</b></p>
37		<p>I consider that the removal of the present restricted coach station to the site of the former Black and White coaches would improve Cheltenham by opening up the Royal Crescent.</p>	<p>Comments noted.</p> <p><b>Local plan objective O11</b> <b>Recommend amend local plan policies to reflect principles of the Urban Design Framework.</b></p>
48		<p>1. St George's Rd - north side. Site would benefit from simple improvement project.</p>	<p>Concerns regarding quality of built environment, including open spaces and buildings which create</p>



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		<p>2. Churchyard: for years I have privately been encouraging action to make this neglected potential quiet haven for all enhanced as a green space right in the town centre. A wall has been down for years. Simple planting, paving, entrances. Friends of St Mary's, Civic Society, Gloucestershire Gardens &amp; Landscape Trust, church authorities, council: can they not act as one in the immediate future? Golden jubilee grants to help realise plans?</p> <p>3. St Margaret's - oh dear! 30 years?</p>	<p>landmarks within the town noted.</p> <p>Adopted local plan recognises the contribution which St Mary's Church makes to the built environment and recognises the need for environmental improvements. The review of the local plan will continue to promote this area and seek to identify works to improve the quality of the open space.</p> <p><b>Local plan objective O7, O11, O12</b> <b>Recommend no change</b></p>
60		<p>The space enclosed by Lansdown Rd, Lansdown Place, Westal Green and Montpellier could be "adopted" to display landscaped gardens where currently private gardens are hidden by a nondescript hedge. The legal work of transferring title and construction work would be rewarded by improved residents' car parking and landscaped gardens maintained by our parks department to the benefit of all concerned.</p>	<p>These gardens are currently in private ownership and provide amenity space for residents. Adoption of this land as public open space would have resource implications for the Council and result in loss of privacy for residents. It is unlikely that the Council could adopt this land in the foreseeable future. It is therefore not appropriate to include within a revised local plan.</p> <p><b>Recommend no change.</b></p>
137		<p>River Chelt is an underused recreational resource at its boundary with the St. Jame's site. It should be cleaned, dredged, widened and landscaped on both banks.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Key Issues paper - Appraisal of existing policies identifies opportunities associated with watercourses for informal recreation. The promotion of watercourses for such purposes requires careful consideration in terms of potential pressures placed upon the biodiversity of these areas.</p> <p><b>Local plan objective O12, O26</b> <b>Recommend</b> consider how the River Chelt may be managed in the long term for the purposes of leisure and recreation, improving the green environment and encouraging local biodiversity.</p>
<i>pollution (see also transport)</i>			
6		<p>On a personal note, and speaking on behalf of local astronomers, a reduction in light pollution would help.</p>	<p>Light pollution covered by policy NE62 of the adopted local plan, which deals with development and pollution (the related note includes a reference to light. However, further information could be provided on this issue.</p> <p><b>Local plan objective O16</b> <b>Recommend</b> that specific reference is made to light pollution in the local plan.</p>
81		<p>In the N.E. of Cheltenham we suffer from noise from light aircraft. I believe coming from Staverton. Why don't they fly over unpopulated areas instead of the town?</p>	<p>Light aircraft using Staverton airport utilise flight paths designated across Cheltenham, including the north-east of the town. The local plan seeks to safeguard these flight paths from development which would affect the movement of light air traffic. The plan currently controls noise levels through the application of policy NE62, which covers development and pollution. Other than this, the local plan cannot control air movements.</p> <p><b>Local plan objective O3</b> <b>Recommend no change.</b></p>
139		<p>Cheltenham centre is blighted by aircraft noise from low flying aircraft in and out of Gloucestershire airport. It dominates the town centre and is clearly heard in the main venues during talks, concerts etc. I live at the foot of Battledown, during the past 2 years the noise</p>	<p>See ref. 81.</p>

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		of aircraft has been a nightmare. How the Council (part owners of the airport) could allow its development so near to the town, and which entails flights directly over the town is beyond comprehension. Even walks in the Cotswolds, our major source of income, are dominated by overhead noise.	
<i>countryside/open spaces</i>			
131		Please make great efforts to protect the countryside around Cheltenham.	Comments noted.
144		<p><b>English Nature</b> We welcome reference to the importance of protecting designated sites and those parts of the countryside which are important for landscapes and wildlife. As you mention, the Rural White Paper and the CROW Act provides further guidance.</p> <p>* The designation of Local Nature Reserves (LNRs) by a Local Authority is an excellent way of safeguarding places for both people and wildlife. They provide important environmental education opportunities for children and adults. They would fit well with your commitments to site protection and sustainability. LNRs need to be agreed with English Nature and there are grants available for certain aspects of their management and use. We would welcome a commitment by the Borough Council to designate LNRs, in particular on a site like Leckhampton Hill.</p>	<p>Comments noted.</p> <p><b>Local plan objective O12, O18</b></p> <p><b>Recommend</b> update plan to reflect current legislation and guidance.</p>
155		<p>I have lived in Timperley Way since the estate was built. I was always led to believe and have always assumed that the open space at the side of my house was a designated open space, protected from sale, development etc and would be shown as such on the local plan.</p> <p>I have recently seen the local plan and was very disturbed to see that this open space along with other nearby open spaces are not shaded as Public Green spaces or Proposed public green spaces. It is essential that this matter be corrected as a matter of urgency. Football pitches and sports fields are important but so are open spaces where people can fly a kite, walk a dog, play etc. These spaces must be preserved as they are an increasingly rare commodity which benefit the whole community.</p>	<p>Comments noted</p> <p><b>Local plan objective O3, O12, O18</b></p> <p><b>Recommend</b> Some open spaces in the Up Hatherley area are not covered by the Local Plan. These areas and other such areas will be considered as part of the plan's review. Which spaces are appropriate for designation will depend largely on the planning history of the area and the nature of consents that were given for development. Many of these would have been given prior to 1991, when the area was in Tewkesbury Borough, so some lengthy research will be required.</p>
170		<p><b>Pittville Area Residents Association</b> The Green Belt is important. Land between Cheltenham and Bishops Cleeve should be sacrosanct. The Green Belt is important in providing a sense of place, beauty, openness, and relief from built up areas. It contributes to the biodiversity of the Cheltenham area, which the council has a duty to protect and enhance. The stringent restraints which apply to the Green Belt and AONB should remain. PARA hope that the vision and commitment to the long term will be exercised in relation to</p>	<p>In meeting Cheltenham's development requirements the Council will need to determine how this can be accommodated within the urban area. All suitable development sites will be considered through the review process of the local plan, development will be requires to make the best use of land and be located in sustainable locations. Changes to the Green Belt boundary may be required to meet Cheltenham's development and transportation needs sustainably.</p> <p><b>Local plan objective O5, O6, O9, O13, O18, O19, O22, O32</b></p>

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		the Green Belt.	<b>Recommend</b> local plan will take into account the findings of the urban capacity study, assessment of employment needs, and findings of reports which will consider transport case and planning considerations of NWDR concept.
183		<b>Gloucester City Council</b> Would support green belt releases where, on a county wide basis, it is most sustainable solution. Any such releases should be allied to improvements in public transport provision and located to make most efficient use of existing or proposed public transport links, particularly the heavily used route between Cheltenham and Gloucester.	See ref. 183.
188	4.5  4.6	<b>Cheltenham Civic Society</b> Why 'higher levels of use'? The essence of some areas is in peace, tranquillity and simplicity. They do not necessarily have to be 'used'. Their visual presence is sufficient.  Both private and public playing fields should be studied, some can be mixed sports use, others multi-purpose including walking the dog, informal play and enjoyment.	Paragraph 4.5 refers to underuse of playing fields. Whilst it is appreciated that some sites may offer peace and quiet to its users, it must also be acknowledged that poor quality facilities and lack of maintenance do not meet the needs for which such sites are allocated. The Council must consider accessibility for all members of the community to well maintained, attractive open spaces which provide adequate facilities and offer safety and security to users.  The Council has appointed consultants to undertake an assessment of playing pitches within the town, considering supply and demand issues. <b>Local plan objective O3, O12, O18, O26, O27</b> <b>Recommend</b> consider findings of playing pitch strategy
193	4.4-4.6  9.1	<b>Countryside Agency</b> Mention is only made of more formal recreational areas (eg parks, playing fields).  40% of borough is designated green belt or AONB. No specific mention made of policy relating to AONB which, although on periphery of borough, is an important and natural resource. Agency would wish to see greater emphasis placed on protection of this landscape via inclusion of landscape character assessment as advocated in PPG7 (further details enclosed).	Cheltenham has a wide range of open spaces, ranging from formal parks and gardens to incidental open spaces within areas of housing. These spaces are important for the health and well being of the local community and form an important part of the character of the town. <b>Local plan objective O12, O16, O18, O26, O27</b> <b>Recommend</b> local plan will have regard to the wide range of open spaces within the town.  The Key Issues paper sought to identify the issues which the Council considered to be important and which should be considered in the review of the local plan. The purpose of the paper was not to identify specific policies.  The Cotswolds AONB lies to the east of the town and is important both in terms of the setting of the town, and in providing recreational opportunities for residents and visitors of Cheltenham. Adopted local plan protects the AONB from inappropriate development which would harm the natural beauty of the area. These policies will be retained in the review of the plan. <b>Local plan objective O9, O10, O13, O16, O18</b> <b>Recommend</b> no change.
194		<b>Mason Richards Planning (on behalf of Bovis Homes)</b> Support protection of both large and small open spaces. Sequential test (sites within urban area before peripheral	The Council recognises the value which large and small green spaces add to the quality of the town, both in terms of urban design and providing formal and informal accessible recreational opportunities.

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		sites) should not be used at expense of sites which play useful role as both visual and functional open space within urban area. Surprised Council has sought to allocate site for development at Starvehall Farm, part of which has been in playing field use in the past.	Such spaces which add value will be protected from development within the review of the local plan. The review of the local plan will have regard to the findings of playing pitch study currently being prepared on behalf of the Council by consultants. Land allocated for development at Starvehall Farm is currently identified in the local plan as 'White Land', this definition means that the land is currently not allocated for any use. It is acknowledged that part of this site previously was used as a playing field, however such use ceased following relocation of Pittville School playing field facilities. <b>Local plan objective O5, O6, O22</b> <b>Recommend</b> no change.
228	4.4  4.6	Parks are needed in a town with a high density of housing. Good parks should have their view protected as well as their green areas. Further protection needed and perhaps conditions re height and screening. Agree with survey as long as green spaces turned into parks rather than housing if it is found they are not needed for sporting activities.	Key issue paper 'Appraisal of Policies' identifies the importance of the setting of the town (policy CO57). This may also be applied to the need to protect the setting of open spaces within the urban area. The Council will consider limited disposal of open spaces which will assist in improving the overall quality of provision within the town. <b>Local plan objective O3, O12, O18, O26, O27</b> <b>Recommend</b> consider findings of playing pitch strategy. Consider contribution open spaces have on the setting of the urban area, and how these can be protected.
229	4.5  4.6	<b>Prestbury Parish Council:</b> Governments guidance is to oppose development on playing fields. These areas are vital to provide facilities for young people in order to combat crime and vandalism. Should also be close to homes.  Terms of Reference for the study by consultants should be published.	The Council has commissioned consultants to prepare a strategy for playing pitch provision within Cheltenham and its immediate environs. The objective of the strategy is to consider issues of supply and demand of playing pitch provision, considering how needs can be accommodated sustainably and quality of provision improved. The final report will be presented to Cabinet on 5 <sup>th</sup> March 2002, and will then be made available for consultation with user groups and other interested parties. The terms of reference of the study will be set out in the introduction to the report. <b>Local plan objective O3, O12, O18, O26, O27</b> <b>Recommend</b> consider findings of playing pitch strategy.
239	4.4  4.6	Green spaces map is not accurate and must be revised immediately  Imperative that money found to maintain existing recreation areas and playing fields. No more sports grounds should be ceded to building. Shortsighted policy.	Comments noted. The Council will consider limited disposal of open spaces which will assist in improving the overall quality of provision within the town. <b>Local plan objective O3, O12, O18, O26, O27</b> <b>Recommend</b> The local plan review will consider existing designation of green spaces, and whether further spaces should be added to ensure their long term protection. Consider findings of playing pitch strategy.
240	4.4	<b>Cheltenham Conservation Area Advisory Panel</b> Green open spaces essential part of pattern of Regency town. In addition to development of 'urban forest' envisaged by urban design, other appropriate areas, eg disused rail tracks should be reserved and enhanced with highest priority.	Comments noted. The Council will consider limited disposal of open spaces which will assist in improving the overall quality of provision within the town. <b>Local plan objective O3, O12, O18, O26, O27</b> <b>Recommend</b> The local plan review will consider existing designation of green spaces, and whether further spaces should be added to ensure their

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	4.5	Evident that Council's limited budget contributing to under use of green spaces. No reason why they should be neglected since only aggravates position. Extensive use not purpose of open spaces and under use not an argument for their redevelopment. Part of texture of town and with appropriate attention will maintain whole environment.	long term protection. Consider findings of playing pitch strategy. Consider contribution open spaces have on the setting of the urban area, and how these can be protected.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon welcome review of playing fields currently being undertaken. If there is an overprovision of playing field areas may be appropriate for these areas to be allocated for new housing or employment sites.	See ref. 240.
273	4.5	Could not support reduction in number of playing fields. Play facilities within parks/open spaces should be encouraged.	See ref. 240.
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Support review of playing fields and recognition that green spaces within town are important to provide for leisure and general amenity as well as sustaining ecological and environmental factors. Would suggest particularly important to protect existing open space within urban area if densities of new housing development to increase and thus private amenity space reduced/limited. Plan should take more proactive approach to protection, maintenance and utilisation of open space. In our view not appropriate to suggest (as in para 4.5) that financial constraints in limiting improvements, which might generate more use of such areas, should be a consideration, as clearly there is the opportunity to cross-subsidise open space through development sites.	See ref. 240.
278	4.4, 4.5, 4.6	Difficult not to be concerned by statements. Must not reduce number of playing fields currently available. All fields are an important asset even if they have become neglected. No mention made of need to preserve these fields to serve ever-growing number of residents. When considering thousands of additional houses and expansion of employment land sensible to promote revitalisation of playing fields.	See 240.
281		<b>Up Hatherley Parish Council</b> Open spaces (re Cheltenham Environs Plan drawn up by Tewkesbury BC and transferred to CBC with transfer of parish in 1991): we ask council to honour its commitment (Cheltenham Environs report to designate the following open spaces as 'proposed public green space' in this revision of the local plan: <ol style="list-style-type: none"> <li>1. Manor Park</li> <li>2. Holmer Park</li> <li>3. Greatfield Park</li> <li>4. Cheriton Park</li> <li>5. Glenlea Park</li> </ol>	Comments noted <b>Local plan objective O3, O12, O18</b> <b>Recommend</b> Some open spaces in the Up Hatherley area are not covered by the Local Plan. These areas and other such areas will be considered as part of the plan's review. Which spaces are appropriate for designation will depend largely on the planning history of the area and the nature of consents that were given for development. Many of these would have been given prior to 1991, when the area was in Tewkesbury Borough, so some lengthy research will be required.

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		<p>Playing fields: repeat request to bring land at M&amp;G Sports Ground into public ownership. Land is being neglected and deliberately allowed to deteriorate and is a waste of a precious sporting complex.</p>	
283	4.4 & 4.6	<p><b>Cheltenham Friends of the Earth</b> Feel it is important to register objection in principle to loss of open spaces. Whilst some may currently be under-utilised important not reduce options for the future, the precautionary approach being part of sustainable development. Also object to development of open space on biodiversity grounds. Where playing fields are currently under utilised they should be enhanced for wildlife and informal recreation. For clarity, we wish to object to inclusion of playing fields, areas of open space used for recreation and areas of open land with biodiversity value as potential development land.</p> <p>Support protection of river corridors in line with policies promoted by Environment Agency.</p> <p>Would support similar scheme to local listing of buildings applied to open spaces.</p>	<p>Comments noted. See ref. 240.</p> <p>Comments noted.</p> <p>Open spaces protected by the identification as public green space. This would not necessarily be strengthened by a local list.</p> <p><b>Local plan objective O12, O16, O18, O26, O27 Recommend</b> consider findings of playing pitch strategy. Consider how the River Chelt may be managed in the long term for the purposes of nature conservation. Review open spaces, identify spaces on local plan proposals map where appropriate.</p>
284	4.4	<p><b>Gloucestershire Wildlife Trust</b> Open space system in borough will support much of local biodiversity resource. Council may wish to consider how the management of open spaces could be altered (probably providing a saving) to enhance biodiversity.</p> <p>Council may also wish to undertake a study to assess current biodiversity interest of open spaces in borough (and other less formal open areas) to provide it with a biodiversity overview. This could be used to identify where planning gain in the form of habitat creation and wildlife corridors can contribute to Biodiversity Action Plan targets. The Council should include in its local plan a policy seeking development to contribute to BAP targets, but by having a prior assessment of the borough with enhancement opportunities in place would enable biodiversity to be considered at an early stage. Such a study should highlight the importance of existing wildlife corridors and the local plan should include a policy with seeks to retain and enhance them.</p>	<p>Comments noted.</p>
295	4.4-4.6	<p><b>Swindon Parish Council</b> Disagree with possibility of reducing number of playing fields</p>	<p>See ref. 240.</p>

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		currently available. All fields are an important asset not only to the community they serve but also to the borough as a whole. Such amenities cannot be replaced by small islands of open space provided within newer larger developments. Sensible to promote revitalisation of playing fields when considering 1000s or additional houses and expansion of employment land.	
303	4.5	Surely criteria for playing field should be condition of surface, young people not concerned with visual attractiveness. But if so offensive, perhaps some of money lavished on Imperial Gardens could be spared. Town centre not easily accessible to everyone and rest of area should share in the money.	Comments noted. See ref. 240.
305	4.3  4.5	Using attached map of Up Hatherley, add parks and allotments omitted from current plan. Imperative to mark these greenspaces (provisionally if necessary) on first print of proposals map.  Remove proposal to pursue strategy of selling off parks or playing fields and say instead that if any are disposed of, it must only be for re-purchase of other green spaces.	Comments noted <b>Local plan objective O3, O12, O18</b> <b>Recommend</b> Some open spaces in the Up Hatherley area are not covered by the Local Plan. These areas and other such areas will be considered as part of the plan's review. Which spaces are appropriate for designation will depend largely on the planning history of the area and the nature of consents that were given for development. Many of these would have been given prior to 1991, when the area was in Tewkesbury Borough, so some lengthy research will be required.
<b>Issue 5 Transport</b>			
<i>general</i>			
120		I agree with the transport plans. Cheltenham is overcrowded with traffic. We need to protect the environment.	Comments noted.
136		Significant financial resources must be made available to tackle the transportation issues. Facilities for alternative modes to the car (bus lanes and cycle routes) must be widespread for people to forsake their car.	The transport strategy of the local plan sets out the framework for the co-ordination of more sustainable land use and transport policy in Cheltenham. The plan is set within the context of the long term vision of the Cheltenham Transport Plan which seeks, through measures implemented by the Council and its partners to move towards a town less dependent upon the car and with less congestion and pollution.  The Council's scope for improving alternative modes of transport to the car, as identified in the Transport Plan, is largely dependent upon the level of capital funding received from government through the Gloucestershire Local Transport Plan settlement. In recognition of this, annual funding for transport capital schemes in Cheltenham has increased from £350,000 in 98/99 to £1,588,000 in 2002/2003. <b>Local plan objective O32 - O36</b> <b>Recommend</b> the local plan will where appropriate allocate or safeguard land for transport schemes set out in the Cheltenham Transport Plan in order to meet the Transport Plan objectives. This will be reflected in the review of the local plan.
170		Pittville Area Residents Association Current	The Cheltenham Transport Plan looks at the period

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		plans will do nothing towards achieving the stated aim of reducing car use, improving air quality and protecting the environment. They are short term, short sighted costly measures.	<p>2000 - 2006. The review of the local plan will need to look beyond this period to 2011, reflecting national, regional and county planning policy objectives.</p> <p>Measures set out in the Cheltenham Transport Plan which have direct or indirect land use implications will be included within the local plan review. Any cost implications associated with these measures will be taken into account in the spending plans of the Council.</p> <p><b>Local plan objective O32 - O36</b>  <b>Recommend</b> the transport strategy of the local plan will reflect the government's commitment to sustainable development in meeting the transport objectives set out in the Cheltenham Transport Plan. Local plan review will need to address issues such as the need to control the location of new development, provision and promotion of sustainable travel patterns through the allocation or safeguarding of land for transport schemes, application of transport accessibility criteria, promotion of travel plans, and review of parking standards.</p>
182	1.5	<b>Cheltenham Cycle Campaign</b> Pleased that 'need to travel' is to be addressed - but can sufficient be achieved locally when much of current travel results from nationwide cultural and employment patterns.	<p>The Cheltenham Transport Plan identifies the problems associated with existing travel patterns within the town and future patterns of travel. It identifies mechanisms which aim to provide alternative travel options to the private car, particularly for short trips with a local origin and destination as these have a significant impact on local traffic problems. The plan is set within the context of national and regional transport objectives which shape the delivery of integrated transport policy at a local level through the cooperation of highway and planning authorities.</p> <p><b>Local plan objective O6, O35</b>  <b>Recommend</b> the local plan review will incorporate the principles of the Cheltenham Transport Plan together with providing for sustainable land use which seeks to reduce the need to travel through locations close to employment, education, local amenities, and accessible to the public transport network.</p>
193		<b>Countryside Agency</b> Welcome emphasis placed on reducing car dependency and potential for increased park and ride facilities. Such facilities, often situated on edge of urban area, should be planned and landscaped sensitively to minimise impact on surrounding rural areas.	<p>The urban design framework identifies the important setting of Cheltenham and the need to protect views into and out of the town. This is also identified in key issue paper, 'Appraisal of Existing Policies' which sets out that the identification of landscapes considered to be important to the town would have a positive impact in addressing the aims and objectives of the Gloucestershire Biodiversity Action Plan. To minimise the impact of future park and ride sites on green belt the Council will consider, amongst other things, the results of the sequential test in Annexe E of PPG 13 in determining the relative suitability of green belt and non green belt sites.</p> <p><b>Local plan objective O2, O6, O9, O10, O12, O32, O33, O35</b>  <b>Recommend</b> the review of the local plan will offer</p>



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			guidance on the principles of urban design, including the requirement for developers to provide an urban design appraisal and statement where appropriate, illustrating understanding of urban design within the context of development.
222	5.6	I wholeheartedly support proposals for a North West Distributor Road. It should be funded by new development as part of a strategy to divert future building away from the Gloucester side of Cheltenham.	Comments noted.
229	5.2	<p><b>Prestbury Parish Council</b> Cheltenham Transport Plan should not have been agreed in advance of rest of Local Plan as it is an integral part and will need to be modified to be compatible with whole plan. Main objections are:</p> <p>Targets for use of service buses need to be established. Without this rest of plan and proposals in Urban Design paper will be incompatible. If targets set in GCC's Local Transport Plan to be adopted, should be stated explicitly in Cheltenham's plan.</p>	<p>The Cheltenham Transport Plan sets out the Council's strategy for transport to 2006. The Cheltenham Transport Plan was subject to extensive public consultation prior to adoption by the Council. Agree that the transport plan is an integral part of the local plan in the setting the transport strategy and reviewing policies. However disagree that transport plan was premature as its timeframe is consistent with statutory Local Transport Plans. The Cheltenham transport plan reflects national, regional and county transport objectives and applies them at the local level.</p> <p>The Cheltenham Transport Plan gives a high priority to improving bus services, and addresses this need through investment in the council's Quality Bus Partnership, enhanced bus priority measures and additional Park and Ride services. The council takes a pragmatic approach, placing less emphasis on targets and more emphasis on having a progressive bus strategy and the mechanisms to promote bus use. This approach has resulted in commercial bus patronage in Cheltenham increasing, in contrast with national levels of bus patronage, which, outside London, have continued to decline.</p> <p><b>Local plan objective O32, O33, O34, O35, O36</b>  <b>Recommend</b> the Council is currently considering additional sites for a Park and Ride facility, and this work will be incorporated into the review of the local plan. Amend local plan polices to reflect the provisions of the Cheltenham Transport Plan and the principles of the Urban Design Framework.</p>
240	5.3  5.11	<p><b>Cheltenham Conservation Area Advisory Panel</b> Agreed, but specifically walking and cycling do not necessarily mix. Where appropriate clear separate provision should be made for cyclists - may become more generally used and advance planning is an important transport issue.</p> <p>Travel plans have their place (journeys to town and to work), but unlikely to affect most people in their need for a car for leisure and other purposes, so all developments should be required to provide this facility. Must be assumed that travel plans will be related to existing routes of transport and not anticipate provision of new traffic roads.</p>	<p>There is no single correct solution to providing a suitable infrastructure to encourage more cycling. In determining the most suitable approach to encouraging cycling the council follows the approach endorsed by the Institution of Highways and Transportation, DTLR and CTC in 'Cycle Friendly Infrastructure'. This considers a hierarchy of solutions which are dependent upon local conditions and broader traffic, environmental and planning objectives.</p> <p>Illegal pavement cycling is often a symptom of hostile road conditions and road layouts which don't take into account the needs of cyclists. With good route planning, traffic management, and attention to design, pavement cycling can be minimised and a safer environment established to encourage greater levels of cycling and walking.</p>

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			<p>The introduction of maximum parking standards in PPG13 is aimed at reducing the availability of on site car parking, which is seen as an incentive to use the car. The provision of on-site parking is not always necessary and may not be compatible with urban design considerations. Travel plans are a key component in the access strategy for developments which incorporate reduced levels of car parking, and need not be restricted to a narrow range of developments.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> the local plan will set out the principles of travel plans in the delivery of sustainable transport objectives. The council will negotiate for travel plans in conjunction with planning applications.</p>
273		<p>Disappointed to note that North West Distributor Road is within this plan. Does not feature in County Council's Local Transport Plan 2001/2-2005/6 and believe it will not relieve majority of traffic problems within Swindon Village area and PE Way. Appreciate that Cheltenham Transport Plan has been adopted by yourselves but understand it is not a statutory document and is in direct conflict with Gloucestershire Local Transport Plan.</p> <p>Also note that Tatchley Lane Link noted on Cheltenham Transport Plan is at odds with route contained in adopted Cheltenham Local Plan. Little explanation as to the change in route, or whether the environmental assessments or transport assessments needed would support this change.</p> <p>I understand that fire service is concerned about water supplies and access for emergency vehicles. I understand that full consultation is undertaken before traffic calming measures are put in place to ensure that fire service is compliant, but would also hope that serious consideration is given to their responses.</p>	<p>Both the county and borough council acknowledge that there are traffic-related problems in the north and west of Cheltenham. These are likely to be exacerbated in the long term by development under construction at GCHQ Benhall and Gloscat, and proposed development within the urban area in the period up to 2011. The two authorities are undertaking a joint study of the issues and possible solutions, which includes an assessment of the viability of a North West Distributor Road (NWDR) and alternative options. The study's conclusions will inform members of the Council in their decision as to whether or not to include a safeguarded route for the NWDR in the review of the Local Plan.</p> <p>The link road shown in Figure 7.4 of the Cheltenham Transport Plan is clearly described as illustrative only and subject to further examination. The Council requires that a planning application to develop the Starvehall Farm site should include a Environmental Impact Assessment and Transport Assessment. These are intended to inform the council in identifying the most suitable means of accessing the site and addressing inadequacies at the nearby junction of Tatchley Lane, Deep Street, Bouncers Lane and Prestbury Road. In doing so these assessments will need to review the case for the Tatchley Lane link, shown in the local plan adopted in 1997.</p> <p>The Council's procedures for planning applications and traffic calming proposals involve consultation with statutory consultees including the emergency services. In determining planning applications the council also takes into account whether the highway and building layout allows for access by emergency service vehicles.</p>
173		<p>SWINDON VILLAGE PARISH AREA - Area fraught with problems, heavy commercial traffic, increased residential traffic, traffic and noise pollution, light pollution, an expanding industrial and commercial presence, and document makes no reference to its well being, merely in effect compounding the</p>	<p>The transport strategy of the local plan sets out the framework for the co-ordination of more sustainable land use and transport policy in Cheltenham. The plan is set within the context of the long term vision of the Cheltenham Transport Plan which seeks, through measures implemented by the Council and its partners to move towards a</p>

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		<p>problems and looking to increase them also.</p> <p>Village is indicated as a high area for car ownership. Reason for this is totally inadequate bus service within area so no alternative!</p>	<p>town less dependent upon the car and with less congestion and pollution.</p> <p>The negative impact of traffic in the Swindon Village area is recognised by both the borough and county council and are funding a joint study of transportation issues in North West Cheltenham. This is intended to identify the most appropriate and viable solutions to these problems in both the short and long term.</p>
292	5.2	<p><b>Gloucestershire County Council</b> Implies that Cheltenham transport plan endorsed by County Council and LTP. There are County Council objections to the plan. The Cheltenham Transport Plan includes objectives and targets which do not directly correspond to those in the statutory Local Transport Plan.</p>	<p>The approach set out in the Cheltenham Transport Plan identifies locally specific objectives, targets and measures for Cheltenham. These need not mirror the Gloucestershire LTP to still be within the overall context of the Gloucestershire LTP. This is not the same as endorsement.</p>
295	5.7	<p><b>Swindon Parish Council</b> Much has been made of the forming of a partnership. Must be an outline of conditions on which partnership based, otherwise residents will lose their services.</p>	<p>The local plan transport strategy provides the framework for promoting sustainable transport and development but cannot deal with the mechanisms of the Quality Bus Partnership. Since the deregulation of local bus services (outside London) in 1985 the powers of commercial bus operators to register, amend or cancel services have been governed by the Transport Act (1985).</p>
305		<p>'Travel minimisation' must be weighted against the town's environmental considerations.</p> <p>Many of national transport and 'sustainability' aspirations need to be applied with wise restraint in the very special environmental case of Cheltenham.</p>	<p>Comments noted.</p>
<b>parking</b>			
4		<p>Re 'Transport Planning' and 'Reducing Car Use':</p> <p>The central free car parking area is an outrage. Cheltenham has a good public service transport system grossly under used. Restrict free parking - force motorists to use public transport and not litter our town by leaving their cars in mostly residential areas, eg Western Road, Malvern Road, Lansdown Crescent, Parabola Road, Montpellier Terrace - I could go on! Double yellow lines everywhere - I speak as a motorist.</p>	<p>Traffic management is considered in broad terms by the local plan. The plan reflects the car parking strategy and alternatives to the private car set out in Cheltenham Transport Plan. This sets out to retain a low level of free, restricted waiting on-street car parking within the town centre, shift the balance of off street public car parking from long to short stay, expand park and ride services and control parking in nearby residential streets using residents parking zones.</p> <p><b>Local plan objective O35, O36</b></p> <p><b>Recommend</b> the Council is currently considering additional sites for a Park and Ride facility, this work will be incorporated into the review of the local plan. The provision of alternative transport facilities will assist the Council in implementing its parking strategy which recognises the difficulties experienced within residential areas close to the town centre. Where appropriate the Council will extend parking controls, including residents parking zones.</p>
5		<p>We have an excellent and ever expanding General Hospital in Cheltenham, however more car parking spaces are needed (multi-storey?).</p>	<p><b>Local plan objective O35, O36</b></p> <p><b>Recommend</b> The transport strategy of the local plan will reflect the approach taken in the Cheltenham Transport Plan and PPG 13 for access to and parking at major trip generators</p>

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			including hospitals. Additional demand for access to services should be met by placing greater emphasis on access by more sustainable means of transport, assisted through the implementation of travel plans, rather than relying upon increased car parking provision.
19		<p>Thank you for the opportunity to comment. I am one of those increasing number of beleaguered motorists who feel more and more marginalised. For the last decade I rarely go to the town centre due to the difficulty of easy access. Complicated and expensive parking, a walk to wherever I am going; all conspire together to mean that, unless I really want something particular, I don't bother. It may sound silly but it's just an expression of human nature. And don't imagine that I drive less because of it, I would rather drive across town to where I could park with ease to get what I want.</p> <p>Oh! how I loved driving along the length of the High Street and Promenade, parking near where I needed to go, nipping in, then heading off. I know that returning to that is now of course long gone, but please do not make life even more difficult for the car driver. A simple trip to the bank now means dumping the car illegally for a couple of minutes and hoping that you can get back before you get ticketed. The inhabitants of our town simply will not park in a distant multi-storey to go to the bank etc, and we all know it.</p> <p>The car is here for good, it's not going to somehow go away; let us accept the car into our lives and make real convenient provision for it.</p>	<p>Comments noted.</p> <p>The transport strategy of the local plan sets out the framework for the co-ordination of more sustainable land use and transport policy in Cheltenham. The plan is set within the context of the long term vision of the Cheltenham Transport Plan which seeks, through measures implemented by the Council and its partners to move towards a town less dependent upon the car and with less congestion and pollution.</p> <p>The local plan retains the overall number of spaces in the town centre with a greater proportion of spaces allocated on a short stay basis rather than for long stay. This will help meet the needs of visitors and shoppers, whilst commuters and those spending longer in the centre will be encouraged to use park and ride, bus services, walk and cycle. Increased priority for pedestrians and improved access by public transport are critical components needed to deliver the prestigious public places and people-friendly shopping streets identified in the council's Urban Design Framework. Focusing on high quality urban design will help maintain the town's reputation as a high quality regional shopping centre and tourist destination.</p> <p><b>Local plan objective O24, O35, O36</b>  <b>Recommend no change</b></p>
22		<p>Reducing traffic will work only to a small degree. Provide alternatives by all means and pedestrianise as many streets as you like, but remember that people like using their cars, and cars need to be parked somewhere. Have you done a survey of your own staff to see what percentage drive to the council offices each day? Please provide more affordable parking, a (regency Style) multi-storey or two. Stop persecuting drivers, this only puts them off shopping in our town and made to feel unwelcome, leading to loss of income and potential employers.</p>	<p>The transport strategy set out in the Cheltenham Transport Plan acknowledges that the private car will continue to play an important role in meeting people's accessibility requirements. However it also recognises the social, environmental and economic damage caused by unmanaged car use, addressing this by advocating sensible, restrained, car use. This can be achieved through demand management and other measures which reduce the need to travel by making alternative modes of transport, such as public transport, walking and cycling, more attractive than the car for many trips. Public car parking will still be required, with the emphasis on high quality, secure, facilities targeted mainly at short stay visitors. By adopting this balanced approach the strategy aims to give motorists more choice of travel mode so that car dependency is lessened and the economic attractiveness of Cheltenham is not impaired by traffic congestion. Failure to recognise and address the problems of traffic growth in a sustainable manner is more likely to result in the long term harm to the town.</p>

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			<p>The Council is preparing its own travel plan, which will include a survey of staff travel behaviour to update existing records. It will also negotiate for travel plans in conjunction with appropriate planning applications.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> the local plan will set out the principles of travel plans in the delivery of sustainable transport objectives.</p>
30		<p>The car is here to stay and to think that you can attract everyone on to public transport is to live in cloud cuckooland, especially if, like me, they need to carry bulky objects. If you are seriously thinking of reducing the number of parking places then please think again. All you will succeed in doing is to close more shops and put another nail in the coffin of local shopkeepers.</p> <p>Once the image has been lost in, say High Street, then places like the promenade will follow and then, no more Cheltenham town centre as we know it. All Cheltenham will then be famous for is more discos and late night misbehaviour, all making it a no go area for middle class people like me who will inevitable end up shopping at out of town supermarkets which I hate.</p> <p>Please solve the car parking problem and keep our town as beautiful as it is, despite the efforts of the jobs and litter louts to wreck it.</p>	<p>The Council recognises that the growth in car use is unsustainable and conflicts with its urban design objectives. Review of the local plan will consider how the movement of traffic within the town can assist in improving the quality of the urban environment whilst still meeting the needs of people shoppers, visitors, and people entering the town everyday to work.</p> <p>The transport strategy set out in the Cheltenham Transport Plan acknowledges that the private car will continue to play an important role in meeting people's accessibility requirements. However it also recognises the social, environmental and economic damage caused by unmanaged car use, addressing this by advocating sensible, restrained, car use. This can be achieved through demand management and other measures which reduce the need to travel by making alternative modes of transport, such as public transport, walking and cycling, more attractive than the car for many trips. Public car parking will still be required, with the emphasis on high quality, secure, facilities targeted mainly at short stay visitors. By adopting this balanced approach the strategy aims to give motorists more choice of travel mode so that car dependency is lessened and the economic attractiveness of Cheltenham is not impaired by traffic congestion. Failure to recognise and address the problems of traffic growth in a sustainable manner is more likely to result in the long term harm to the town.</p> <p><b>Local plan objective O11, O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan and the principles of the Urban Design Framework.</p>
67		<p>You are not addressing:</p> <ol style="list-style-type: none"> <li>1. All day car parking in residential streets.</li> <li>2. Continuous, not intermittent, bicycle tracks.</li> </ol> <p>All cars in town are seriously detrimental to people living, working or visiting there. Your overall policy objective must be to limit them both in number and impact on the Cheltenham environment; I think you agree with this in your Nexus statements. These objectives would surely be achieved by:</p> <ul style="list-style-type: none"> <li>- minimising use of cars to travel routinely to town workplaces</li> <li>- maximising travel to town workplaces by foot or bicycle</li> <li>- minimising parked cars in town streets</li> </ul>	<p>Cheltenham Transport Plan addresses the issues outlined, where appropriate these will be incorporated into the review of the local plan. The Transport Plan recognises the pressure on the availability of parking space on residents, shoppers, visitors and people working within the town. The Transport Plan proposes to retain the overall number of parking spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. Long stay visitors will be encouraged to use of park and ride services, and residents parking zones will be extended.</p>

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		<p>- establishing fully pedestrianised town centre streets (not partially pedestrianised, as at present)</p> <p>- preventing all day parking in residential streets</p> <p>This must, obviously, be done without deterring visitors to the town, or causing undue hardship to the workforce. There must also be clear benefit to residents who, after all, help pay for all your works.</p> <p>I believe you must, therefore, implement the following changes, with unswerving confidence and without delay:</p> <ul style="list-style-type: none"> <li>- establish a comprehensive system of Residential Parking Permits throughout Cheltenham*</li> <li>- mark all residential streets as 'Resident Only' parking</li> <li>- mark all town centre streets as 'no parking'; complete the pedestrianisation</li> <li>- do not permit any parking on footpaths and other pedestrian areas</li> <li>- remove parking charges in all town car parks</li> <li>- appoint more traffic wardens and stringently uphold parking regulations (by tow away, clamping etc.)</li> <li>- construct more bicycle lanes to complete a town wide network of dedicated, well marked, tracks</li> <li>- provide (if possible) more town perimeter car parks, with free buses into the centre</li> <li>- develop and extend the 'one-way' street network of Cheltenham</li> <li>- find a source or supplier of small, lightweight, 'city' buses and establish a cheap 'one-price' network*</li> <li>- if research shows a potential worker demand, extend the network to all the satellite villages (trams or light railways, as being introduced elsewhere, would not, unfortunately, fit Cheltenham)</li> <li>- charge all town centre businesses which provide permanent car parking on their premises*</li> </ul> <p>Apart from those items marked * from which some income will be generated, all these improvements will add significantly to Council capital and running costs. However, this has to be accepted, just as it has nationally with the NHS and education. Your task is to sell it to the people - but whatever the resistance, raise the funds and do not be deflected from implementation.</p>	<p>Whilst recognising the role of the private car, the local plan also recognises the importance of alternative modes of transport in providing access to the town centre. The local plan will promote and provide facilities for park and ride, better integration of transport, and opportunities for walking and cycling. By reflecting demand management measures set out in the transport plan and urban design issues set out in the urban design framework, the local plan seeks to create a town with a 'high quality shopping and tourist centre, a town centre full of vitality, with an attractive pedestrian friendly environment and ambience'.</p> <p>Detailed issues of traffic management such as policing of on street car parking, parking charges, provision of cycle tracks, and provision of public transport are not matters which can be dealt with in the remit of the local plan. These issues are outlined in the Cheltenham Transport Plan.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan and the principles of the Urban Design Framework.</p>
107		<p>I would ask that you consider in your Transport Plan those with limited mobility, either through disability or age, who neither need or wish to use the Shopmobility scheme ( for which I have full praise) and for whom the little they can walk is much needed</p>	<p>A strategic theme of the local plan is one of sustainable development. A key objective of sustainability is the need to recognise the needs of everyone. In land use terms the plan will seek to provide facilities in new development and improve mobility for people with disabilities and the elderly.</p>

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		exercise. In these cases there is a need for disabled parking near facilities. If streets are pedestrianised/ closed to traffic even more, will there still be disabled parking close enough to shops, restaurants etc.?	Detailed demand management and mobility management measures cannot be dealt with specifically in the local plan. These are considered by Gloucestershire Local Transport Plan and Cheltenham Transport Plan which set out a strategy to address the needs of people with disabilities in the County. <b>Local plan objective O8</b> <b>Recommend</b> local plan will continue to highlight the needs of people with disabilities in the context of recognising the needs of everyone. This broad sustainability objective will be integrated into all chapters of the plan.
115	Pg3	New offices etc. Blocks of flats should show parking and transport in planning applications (i.e. off road).	In assessing planning applications the Council will reflect car parking requirements set out in PPG13-Transport and the Gloucestershire Local Transport Plan. <b>Local plan objective O34, O35</b> <b>Recommend</b> policy GP1 revised to identify the information which the Council will require to accompany planning applications.
121		Restore public transport to Montpellier or provide adequate parking facilities there.	The local plan aims to meet the needs of visitors and shoppers to the town centre by retaining the overall number of off street public car parking spaces, allocating a greater proportion of spaces to short stay basis rather than long stay, and promoting development which is accessible by public transport, cycling and walking. The plan supports the use of park and ride services and improvements to town bus services in order to meet the needs of long stay visitors. <b>Local plan objective O35, O36</b> <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan.
152		We recently went to an evening concert at the town hall. We were warned by several people not to take the car because each of those we spoke to had damage to their vehicles in the street/car park near the town hall. We took a taxi - cost £14. In order to encourage out-of-town visitors to evening central events, may I suggest a clearly defined, event-specific, well lit and security patrolled parking area? I would willingly pay for access to this. It would be less than £14.	Designing out crime is an important issue in the management of car parks. Secured by design principles are implemented where appropriate and where funding is available to reduce the opportunity for vehicle crime and address issues of personal safety. Measures taken by the council in order to meet the standards set out in the AA's Secure Car Park scheme include the introduction of CCTV at main public car parks in the town centre, and at park and ride sites. <b>Local plan objective O34</b> <b>Recommend</b> reflect Councils commitment to community safety in transport chapter.
170		<b>Pittville Area Residents Association</b> Support the vision of the plan, however there appears to be conflict regarding transport provision. The periphery of Pittville has suffered from past policies of attracting cars into the town. Parked cars cause congestion in residential streets and problems for residents. Maintenance of 3,300 car parking spaces conflicts with the aim to reduce the number of cars entering the town centre and providing alternative forms of transport. People have to be actively discouraged from using their cars.	Cheltenham Transport Plan addresses the issues outlined, where appropriate these will be incorporated into the review of the local plan. The Transport Plan recognises the pressure on the availability of parking space on residents, shoppers, visitors and people working within the town. The Transport Plan proposes to retain the overall number of parking spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. Long stay visitors will be encouraged to use of park and ride services, and residents parking zones will be

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			<p>extended.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.</p>
229	5.9-5.10, 6.3, 6.11	<p><b>Prestbury Parish Council</b> These are incompatible objectives. Decline in town centre shopping mainly due to problems of access by car. Public transport is totally inadequate and short stay parking is unsuitable. Shoppers use cars to access their preferred choice of shopping area and local plan must reconcile these conflicting issues.</p>	<p>The local plan retains the overall number of spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. The plan supports the use of park and ride and town bus services to meet the needs of long stay visitors.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.</p>
240	5.10	<p><b>Cheltenham Conservation Area Advisory Panel</b> New development must provide adequate car parking for residents and visitors. Must avoid on street parking.</p>	<p>Comments noted. The local plan must balance the access needs of development with wider planning, environmental and urban design considerations.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> car parking policies of local plan will be revised in response to PPG13, RPG10, Gloucestershire Local Transport Plan, and Cheltenham Transport Plan. Car parking policies will be considered alongside the requirement for the production of travel plans, Park and Ride strategies and improvements in facilities for public transport, pedestrians and cyclists.</p>
293		<p><b>Peacock &amp; Smith (on behalf of WM Morrison Supermarkets plc.)</b> Proposed car parking standards for food retail developments</p> <p>Wm Morrison Supermarkets consider that base standard for car parking associated with new food retail developments should reflect recent government guidance set out in PPG13.</p> <p>Support broad approach set out within PPG6 of directing new retail development to town centres in first instance, in order to sustain and enhance their vitality and viability. Company consider, however, that this approach will work in practice only if those centres can be developed in a manner which allows that development to be truly competitive with existing retail provision. Very often this would involve being competitive with existing foodstores which have larger car parks. Where a new store is proposed it must be of sufficient scale, and must also be sufficiently attractive to bulk food shopping public in order to be competitive.</p> <p>In broad terms, to fulfil objectives of PPG6, it is necessary for town centre retailing to be competitive. To achieve this it must provide sufficient car parking to make store as attractive as other existing stores in area. Wm Morrison Supermarkets suggest, therefore, that a base car parking standard for food retail development should be adopted as follows:</p>	<p>The county structure plan advocates locating most strategically significant development in the principal urban areas of Cheltenham and Gloucester, within the Central Severn Vale (CSV). Locating here, closest to users, maximises the potential for trips to be made by walking, cycling and public transport rather than by car.</p> <p>PPG 13 (Transport) sets national maximum parking standards for strategically significant development and encourages regional planning bodies and local authorities to adopt more rigorous standards where appropriate.</p> <p>For food retail developments over 1000m<sup>2</sup> PPG13 suggests 1 space per 14m<sup>2</sup> gross floor area. The Gloucestershire Local Transport Plan (LTP) requires a more rigorous standard of 1 space per 18m<sup>2</sup> gross floor area, across the whole of Gloucestershire. The LTP also allows districts to set more rigorous, locally appropriate, standards provided that these do not create incentives for development to locate in peripheral areas. Cheltenham has public transport services which compare favourably with the rest of Gloucestershire so there is greater potential for trips to be made without reliance upon the private car. In these circumstances it would be reasonable for the local plan review to consider parking standards which are more rigorous than those set out in PPG13 and still comply with the LTP.</p> <p>In the Cheltenham Transport Plan the Town Centre Strategy sets out how the council aims to meet the</p>



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		<p>One space per 14 sq m gross floor area for food retail development of 1000 sq m and above. (It may be appropriate to retain the higher base standard of one space per 18 sq m gross floor area for food retail development with a gross floorspace of below 1000 sq m.)</p>	<p>objectives in PPG6 by improving access to the town centre for public transport users, cyclists and pedestrians. It proposes to invest in high quality public car parking facilities with charges structured to favour visitors and shoppers over commuters. By creating a high quality town centre environment, accessible by a range of transport modes, and encouraging more efficient land use through shared use of car parking provision, development in the town centre should be able to remain competitive without the same level of parking provision as is provided at less accessible, edge of town, development.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> car parking policies of local plan will be revised in response to PPG13, RPG10, Gloucestershire Local Transport Plan, and Cheltenham Transport Plan.</p>
295		<p><b>Swindon Parish Council</b> Restricting parking provision at new developments will generate more on-street parking and congestion, as people are unlikely to leave their cars at home or use Park and Ride. Few will be in a position to increase car parking facilities later if this policy proves to be a mistake.</p> <p>Commuter parking in residential areas should be recognised as a reciprocal arrangement and be permitted to continue. Residents parking should not be expanded.</p>	<p>PPG13 (Transport), the Gloucestershire Local Transport Plan, the Cheltenham Transport Plan and RPG10 (Regional Planning Guidance for the south west). All require local planning authorities (LPA's) to set maximum, as opposed to minimum, car parking standards for new development.</p> <p>This principle is based upon evidence that for many trips people's choice of travel mode is largely influenced by the availability of car parking at their destination. Developers are required to ensure that a higher proportion of trips are made by non-car modes. In most locations this is hard to achieve without demand management measures such as limiting the supply of parking.</p> <p>Developers may choose to provide a lower level of parking than the maximum. If this is the case, the LPA must decide whether to approve the application and manage the risk of adverse impacts using planning conditions or through the implementation of travel plans in a S.106 agreement. Where these cannot be managed and enforced it may be necessary to refuse planning permission.</p> <p>This approach also requires the alternative modes of travel to be made more attractive. These can be funded using developer contributions.</p> <p>Commuter parking - the availability of on street parking close to major destinations serves to encourage and perpetuate car use. As well as generating traffic along routes and in residential areas it often creates on street parking problems for local communities at the destination. It is quite incorrect to suggest that the arrangement is reciprocal. Residents car parking schemes will continue to be implemented where consultation shows that a majority of residents support it.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> car parking policies of local plan will be revised in response to PPG13, RPG10,</p>

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			Gloucestershire Local Transport Plan, and Cheltenham Transport Plan.
305	5.10	<p>Say that reducing car parking requirement inside Cheltenham Conservation Area risks harming it.</p> <p>Commuter and business vehicles will park-up just outside this envelope and so current area of benefit should be extended to avoid overloading predominantly residential districts.</p>	<p>Reducing car parking provision is a key demand management tool advocated in PPG13, the county LTP, the Cheltenham Transport Plan and RPG10 (see above). LPA's are expected to manage any possible adverse consequences of this approach using planning conditions, planning obligations and requiring the implementation of travel plans. Reducing car parking provision not only supports sustainable transport objectives but it can also enable a new development to incorporate a higher quality of urban design.</p> <p>Commuter parking - comments noted. See ref. 295.</p> <p><b>Local plan objective O2, O6, O35, O36</b>  <b>Recommend</b> car parking policies of local plan will be revised in response to PPG13, RPG10, Gloucestershire Local Transport Plan, and Cheltenham Transport Plan.</p>
<i>public transport/ park and ride</i>			
5		A regular, frequent and reliable public transport service is needed from the railway station, town centre and other key points (P&R?)	<p>The plan supports the use of park and ride services which meets the needs of long stay visitors. A key element of the transport strategy set out in the Cheltenham Transport Plan involves the Quality Bus Partnership. Through this mechanism the council and a major commercial bus operator work together to invest in highway infrastructure and improve the quality and integration of town bus services.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan.</p>
43		Park and Ride must be seen as at best a short term fudge since although it will reduce congestion in the town, it does little or nothing for the greenhouse gas emissions as it potentially encourages car use, especially over long distances. The long term solution needs to get visitors to use public transport for their entire journey.	<p>Park and Ride is one of a number of measures set out in the Cheltenham Transport Plan to improve alternatives to the private car. It is particularly aimed at long stay visitors and commuters travelling by car to the town centre from rural areas which are poorly served by public transport. Park and Ride plays an integral part in promoting sustainable travel patterns, together with bus service improvements, increased use of taxi and private hire vehicles, rail and coach services.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan.</p>
60		Employees working within 1/2 mile radius of the Town Hall could be offered concessions for park & ride facilities. If adopted this scheme would reduce congestion and improve conditions for employment.	<p>Agreed. The Council is currently preparing a Travel Plan which will consider such incentives subject to there being sufficient funds.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> the local plan will set out the principles of travel plans in the delivery of sustainable transport objectives. The council will negotiate for travel plans in conjunction with planning applications.</p>
66		<ol style="list-style-type: none"> <li>There needs to be a free/cheap town centre public transport loop to complement the Park &amp; Ride system.</li> <li>The 'carrot' of Park &amp; Ride needs to be</li> </ol>	Detailed traffic management issues, including public transport and parking charges are not matters which can be dealt with in the remit of the local plan. The town centre transport strategy set

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		complemented by the 'stick' of restricted and higher cost central parking. 3. This will require political 'nerve' in relation to the vociferous but unthinking 'motorists' lobby.	out in the Cheltenham Transport Plan adopts the principle of balancing the supply and cost of town centre car parking with the price of park and ride, so as to influence people's choice of travel mode to the town centre. <b>Local plan objective O35, O36</b> <b>Recommend N/A</b>
74		Public transport instead of domestic vehicles is the answer, park and ride which I did not think initially workable is doing well. However a free form of transport running not only to the Queens to holy Trinity car park, but also from the Arcades to Winston Churchill Gardens might be very useful. The Honeybourne line could see to public transport working from the railway station through to the Prince of Wales stadium, encompassing the new Waitrose development.	The local plan safeguards the Honeybourne Line from development to facilitate the future provision of a rapid public transport system. <b>Local plan objective O35, O36</b> <b>Recommend no change.</b>
96		I support the aim of reducing town centre traffic, although I doubt whether all the additional park and ride schemes would be as viable as Arle Court.	Comments noted.
115	Pg5  Pg9	Local shopping centres. Out of town shopping needs a car due to shopping around for comparison goods. One used to use one's legs having caught a bus to town. Transport from site to site?  Disagree with the comment 'Quality Bus'. Swindon village is fortunate in having another company. More competition.	The local plan recognises the importance of the private car in accessing facilities such as out of centre shopping areas. However the plan, through its transport strategy seeks to provide sustainable transport choices as an alternative to the private car. Where new development is proposed the local plan will apply the sequential test process, only when there are no suitable sites within the urban area will the Council consider sites on the edge of the town. In addition, the local plan will require the preparation of travel plans for developments which would generate significant amounts of travel. The objective of such plans should be to deliver sustainable transport objectives by promoting reductions in car use, increased walking, cycling and public transport, and environmentally friendly delivery and freight movements. <b>Local plan objective O35</b> <b>Recommend</b> the council will negotiate for travel plans in conjunction with planning applications.
139		Traffic control is difficult. As a non car driver I am only too aware of the poor bus services, these have deteriorated. Until they improve, people will not consider any alternative to the car.	Comments noted. The objectives and measures set out in the Cheltenham Transport Plan seek to bring forward improvements in public transport provision. These improvements will be achieved through quality bus partnerships, increasing bus frequencies, implementing bus priority measures, and providing concessionary travel schemes for the elderly and disabled. <b>Local plan objective O35</b> <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.
152		Buses - routes which run beyond the Park & Ride, eg D & E Stagecoach to Cleeve are filled quickly in Cheltenham and Cleeve people are having to stand (these are mostly elderly or have children). The temptation is to forget these buses now and travel in by car - the opposite of what we have been	Comments noted - these will be taken up with the bus operator through the Quality Bus Partnership process.

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		encouraged to do. Discomfort is not an attractive proposition.	
157		In my opinion the traffic problem is not going to be solved until there is more extensive limited parking and the much greater use of the Park and Ride facilities. The Racecourse Park and Ride compared with a similar Park and Ride at the Pear Tree facility at Oxford is pitifully under used. Oxford has very similar problems in traffic control to Cheltenham and by limited street parking together with increase parking charges has encouraged the use of Park and Ride. I visit Oxford regularly and the Pear Tree facility which is much larger than the Racecourse is always full to capacity. There is a fee of 50p for 24 hour parking and £1.50 return for the 10 minute bus ride to the centre. Consultation with the Oxford authority may be helpful. There should also be a noticeboard indicating the Park and Ride to visitors approaching from the North and sited approximately in the vicinity of the old Racecourse railway station. Consideration should also be given to reduce the waiting where off street parking is permitted from 1 1/2 hours to one hour.	The local plan retains the overall number of spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. The plan supports the use of park and ride services which meets the needs of long stay visitors. Park and ride and improved local bus services are key elements of the transport strategy of the local plan. Two park and ride sites currently operate within the town. The local plan will consider other potential sites on the main radial routes into the town together with bus priority measures and parking strategies. <b>Local plan objective O35, O36</b> <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.
170		<b>Pitville Area Residents Association</b> Park and ride facilities keep traffic out of the town centre, as long as parking availability in the town centre is reduced. They do not reduce car use or provide alternative forms of transport. Are park and ride facilities sustainable, or merely a way of shifting the problem elsewhere?	The review of the local plan must consider the needs of visitors to the town, alongside existing residents and people wishing to move to the town to live and work. The provision of park and ride facilities seeks to encourage commuters and long term stay visitors to the town to change their travel patterns and assist in reducing the level of congestion in the town centre. It is a pragmatic option for long stay visitors and commuters travelling by car to the town centre from rural areas which are poorly served by public transport. This measure is supplemented by public transport, walking and cycling measures set out in the Cheltenham Transport Plan. <b>Local plan objective O35, O36</b> <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.
182	5.7	<b>Cheltenham Cycle Campaign</b> it is inappropriate to include P&R as a 'sustainable transport pattern'. Might well be pragmatic option at present time, but can encourage over use of cars and does nothing to encourage people to live more centrally, thereby reducing travel needs.	See ref. 170.
183	5.3	<b>Gloucester City Council</b> While supporting P&R as form of urban traffic management, should not be described as alternative to car as it requires car use and has even been shown to increase car use. Suggest that a P&R facility at Cheltenham end of Golden Valley route could run buses from Cheltenham to Gloucester thus capturing car traffic at start of its cross country journey, rather than towards end. Proposed Elmbridge	The transport strategy of the local plan emphasises the role of park and ride in promoting sustainable travel choices. Whilst this does not provide an alternative to the private car for the whole of a journey, it does assist in reducing the overall number of vehicle movements within Cheltenham where the negative impacts of traffic congestion are most evident. <b>Local plan objective O35, O36</b> <b>Recommend</b> the review of the local plan will

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		Court facility could be utilised for those travelling from Gloucester to Cheltenham. Perhaps this is an idea our councils could develop jointly with County.	recognise the use of park and ride in the 'management' of urban traffic. The Council has appointed consultants to identify potential sites to develop park and ride sites on the main radial routes into Cheltenham, the results of this study will be discussed with neighbouring local authorities.
188	1.5	<b>Cheltenham Civic Society</b> Travel by 'bus' to be in place prior to any restrictions on car use.	The improvement of local bus services is one of the short term priorities of the transport strategy of the local plan and represents one of the main alternatives to use of the private car in Cheltenham. Through the Cheltenham Transport Plan the Council is working with public transport providers through a Quality Bus Partnership to bring forward a more integrated and reliable bus network. Improvement of bus services will be implemented together with demand management measures such as the reduction in long stay car parking in the town centre which will play a role in influencing a modal shift in travel. <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.
194		<b>Mason Richards Planning (on behalf of Bovis Homes)</b> support need for encouraging travel choice and principle of requirement to find new P&R sites, particularly relating to A46.	Comments noted.
213		<b>Highways Agency</b> Report highlights need to address proposals for three new Park & Ride sites, one of which will be located on A40 in eastern part of Borough. As this section of the A40 is likely to be de-trunked in the future, do not believe these proposals will be of concern to Agency, but nevertheless we will continue to monitor their progress until such time as the de-trunking takes place.	Comments noted.
217		Need a reliable bus service between Bishops Cleeve and Benhall before the new GCHQ and Gloscat establishments are up and running so that future staff/students are aware of alternatives to car use. This bus service/cycle path would also benefit those working/using the industrial/retail outlets inbetween.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Through planning obligations, the Council requires GCHQ and Gloscat to prepare Travel Plans. These will look at the travel pattern of staff/students, identifying opportunities for car sharing, use of public transport, cycling and walking to bring forward a modal shift away from the private car. <b>Local plan objective O35, O36</b> <b>Recommend</b> the local plan will promote the preparation of travel plans through the development control process. Where new developments are expected to generate significant amounts of travel then the preparation of a travel plan will be required as a condition of any planning consent.
228	5.7	Strongly support more Park and Ride. Commuter should be forced/encouraged to use these to save in-town parking for shoppers/visitors.	The local plan retains the overall number of off street public car parking spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. The plan supports the use of park and ride and town bus services which meets the needs of long stay visitors. <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.

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240	5.7	<b>Cheltenham Conservation Area Advisory Panel</b> Supported, but location of Park & Ride should not be excuse for other nearby development if in green belt area.	Comments noted. <b>Local plan objective O5, O6, O7, O9, O10, O12, O13, O14, O15, O18, O19, O20, O22, O32, O35, O36</b> <b>Recommend</b> consider findings of urban capacity study, park and ride study and assessment of employment land.
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Generally support transport strategy, but believe it is important to recognise and realise the potential for integration of public transport initiatives, particularly between Park and Ride and alternative modes of travel. In this respect, an initial transport assessment of Hunting Butts proposals previously submitted has identified various traffic management measures which would be implemented as part of those proposals.  Disappointed that in identifying alternatives to the car, specific mention not been made of potential to realise a unique public transport initiative along the Honeybourn line as proposed in our submissions regarding the Hunting Butts proposals. Offers the opportunity to provide a direct link between the north of the town and its centre, linking P&R facilities and utilising a route not involving the existing road network.	The adopted local plan safeguards the Honeybourne Line for the potential future development of a rapid public transport system. The Council continues to support this safeguarding policy as a mechanism to promote an innovative and sustainable transport scheme which would provide an alternative to the private car. <b>Local Plan Objective O35</b> <b>Recommend</b> no change.
278	5.7	Alternatives to the car: much has been made of [bus quality] partnership but recent evidence is that partnership is one-sided, with bus companies only wishing to service profitable and short routes. Those routes that they don't want are being financed by borough, in other words by those that pay their community tax. Must be an outline of conditions on which bus quality partnership based to make it balanced, otherwise residents of borough will lose their services.	Detailed transportation matters such as this cannot be dealt with in the local plan.  The balance of power between councils and bus operators over commercial bus services is largely governed by national legislation. Neither party is currently in favour of adopting a more legalistic Quality Contract. <b>Local plan objectives O34, O35, O36</b> <b>Recommendation:</b> none
283		<b>Cheltenham Friends of the Earth</b> Would like to see provision of evening bus services connecting housing developments with town centre.	Comments noted. To improve the accessibility of residential sites the council is making increased use of the travel accessibility criteria set out in RPG10 (Regional Planning Guidance for the South West). It is also developing supplementary planning guidance on planning obligations to give all parties in new development an earlier indication of the transport contributions which will be sought by the council. <b>Local plan objective: O6, O8, O33, O35, O36</b> <b>Recommendation:</b> The local plan review will use the interim transport accessibility criteria set out within RPG10 (Regional Planning for the South West) as a benchmark for major new development.
287	5.7	<b>CPRE</b> Recognise potential help P&R can give to reduce town centre congestion, improve quality of urban life and therefore indirectly reduce pressures on surrounding countryside. But each proposal should be critically examined to ensure that:	Comments noted. <b>Local plan objective O5, O6, O7, O9, O10, O12, O13, O14, O15, O18, O19, O20, O22, O32, O35, O36</b> <b>Recommend</b> consider findings of urban capacity study, park and ride study and assessment of

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	6.12, 6.13	<p>a. it really will reduce town centre traffic; departure/destination studies needed for this - somewhat sceptical about value of A40 proposal at Dowdeswell.</p> <p>b. there is good landscaping and screening of site.</p> <p>c. no "enabling" development which would not otherwise be permitted is allowed to proceed as a way of financing the P&amp;R facility.</p> <p>No reference in to reduction in town centre parking capacity as a corollary to any P&amp;R schemes. Believe this point should be reconsidered.</p>	<p>employment land.</p> <p>The primary target of the town centre parking strategy and park and ride strategy is long stay and commuter parking. Restructuring parking provision and charging regimes in town centre public car parks and increased implementation of residents parking schemes, are two of the main demand management mechanisms being used to reduce the supply and increase the cost of long stay car parking in the town centre.</p> <p><b>Local plan objectives O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.</p>
295		<p><b>Swindon Parish Council</b> The low level of households in Swindon Village not owning a car (12%, clause 3.13) is due to the lack of public transport alternatives. There is little benefit in comparing a rural village like Swindon with a town like Cheltenham. Publish figures for all areas.</p> <p>'Public transport is often perceived to be expensive, unreliable and dirty', and ask how Stagecoach propose to address this.</p> <p>Many local people believe that if you have to get your car out to travel to a Park and Ride site you might as well continue your journey into town. Arle Court Park and Ride is not a success, as it runs at a loss. Racecourse Park and Ride site should have a dedicated service. Bus company appears to lack commitment to the service.</p> <p>Quality Bus Partnership operators should not be allowed to cherry pick the most profitable routes unless they improve other services. They should consider profit from the overall network rather than from each route.</p> <p>Out of town facilities poorly served by public transport.</p> <p>To promote taxis and Private Hire Vehicles introduce a system for setting and monitoring fares.</p>	<p>The Cheltenham Transport Plan sets out how the council is working in partnership with others, including the County Council and major local bus operator, to improve the alternatives to the car.</p> <p>The Quality Bus Partnership (QBP) has delivered a wide range of service improvements by adopting a more focused approach to investment by the council and bus operator. That bus patronage in Cheltenham is growing year on year, against the national trend of declining use outside the capital, is a clear indication of the overall success of the approach set out by the council in its transport plan. There is still much more work to be done improving the quality and provision of bus services within Cheltenham. The council sees the QBP as a valuable mechanism for helping it to deliver its transport objectives, as a framework for liaison with the operator about day to day issues and the planning of longer term improvements.</p> <p>The primary objective of the Park and Ride is to reduce car trips into the town centre, and the negative impacts of congestion. It aims to do this by providing an attractive alternative mode of transport for motorists travelling into the town centre, especially from Cheltenham's rural hinterland where public transport services are less viable. To base a judgement of its success upon financial criteria alone is to place no value on the environmental, economic, amenity, health, safety and social benefits of measures which control traffic levels.</p> <p><b>Local plan objectives O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.</p>
304	5.7	<p>Town generates traffic and that is where it should park, and where associated problems of pollution and noise should go with it. Must be a balanced approach towards traffic management and provision of bus services which takes account of needs of all residents of borough and of effects on all areas of borough.</p>	<p>See ref. 295.</p>
305	5.7	<p>Plan should state the option of finding it</p>	<p>Comments noted. see ref. 295.</p>

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		<p>undesirable on balance to site a P&amp;R on A46, which is a sensitive route. Not suitable to be major radial route into town.</p> <p>It is an imperfect concept in terms of sustainability because it largely facilitates country and small-town consumers, who can drive any distance across the county and then only have their driving restricted when they hit the Borough boundary. There are obvious implementation barriers along proposed Park &amp; Ride routes. Proposed site on hill side of A46 could never be visually acceptable. Coupled with unviability of even one bus-lane along Shurdington Road or Bath Road, plus difficulty of identifying environmentally acceptable site, even on down hill side, means that no P&amp;R site should be scheduled on A46. Only possible site would be on 'pylon field' - lies lower than road and could therefore be screened. However must not impact on rural Chargrove Lane and would need enhanced 'planting land' to protect and screen one of the two adjacent cottages.</p>	<p><b>Local plan objectives O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan. Consider findings of Park and Ride study.</p>
<i>cars</i>			
108		<p>Regaining the streets for the people - sounds good, but what does it mean? It sounds as if the people have been ousted from the streets. Weren't the streets originally built for the people's wheeled transport, and aren't they still using them for that purpose? Of course the hidden agenda is: 'Remove the local people from their streets if they are in their cars'. So why not say so, cut out the spin and the 'weasel' words.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Whilst recognising the role of the private car, the local plan also recognises the pressure which the increase in car use has upon the town centre in terms of accessibility, safety, and quality of the environment.</p> <p><b>Local plan objective O35, O36</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan</p>
<i>congestion</i>			
61		<p>Need a link taking Cleeve and Prestbury traffic to the A40 east of Charlton Kings; one-way solution to the permanent jam up where Tewkesbury Road meets Gloucester Road (one way east on Swindon Rd, one way west on High St, knock down Townsend St for northbound cars); and a link from Hatherley Way to the A435 Cirencester Road.</p>	<p>Comments noted. Detailed traffic management falls within the remit of the Cheltenham Transport Plan, not the local plan. Whilst recognising the role of the private car, the local plan also recognises the pressure which the increase in car use has upon the town centre in terms of accessibility, safety, and quality of the environment.</p> <p><b>Local plan objective O36</b>  <b>Recommend</b> N/A</p>
77		<p>It worries me what will happen to this town when the new central supermarket opens, and GCHQ opens at Benhall where I hear they will employ 8000+ people. Where are the people going to live? How many will have cars? The overall congestion in this town will be appalling and what affect will this have on Stagecoach services? They say they are 25 drivers short and I'm told a lack of harmony between drivers and local management, leading to friction and bad temper, so we the general public suffer. Some drivers are very</p>	<p>The Council's Planning Committee carefully considered the impacts of transport when considering the applications for development at GCHQ, and land at St James. These applications were required to prepare a transport assessment considering issues such as the need for car parking, estimates of traffic levels following development, and measures to reduce the impact of additional traffic. In addition the Council, through a planning obligation requires GCHQ to prepare a Green Travel Plan. This plan will look at the travel pattern of staff, identifying opportunities</p>



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		unpleasant and unhelpful.	for car sharing, use of public transport, cycling and walking to bring forward a modal shift away from the private car.  Through the Cheltenham Transport Plan the Council is working with public transport providers through a Quality Bus Partnership to bring forward a more integrated and reliable bus network. <b>Local plan objective O35, O36</b> <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan.
147		The biggest problem relating to traffic, particularly in Charlton Kings, is through traffic on the London Road which should not need to pass through the town at all. When is the A40 going to be de-trunked and traffic diverted via Seven Springs? This would be of more help than Park & Ride in reducing traffic flow from the East.	The Highways Agency has declared the section of the A40 through Cheltenham as non-core trunk road, and as such it is their intention to detrunk it. At the time of writing Gloucestershire County Council have received no formal draft order from the Highways Agency for detrunking in Area 2, which includes the A40 in Cheltenham. However a 2003 target date has been mentioned by the Highways Agency.  The County Council is currently involved in discussions with the Highways Agency regarding detrunking issues, and in particular concerns it has about maintenance. Once the A40 is detrunked Cheltenham Borough Council will have a greater say in pursuing traffic management measures intended to minimise the impact of through traffic in the borough. <b>Local plan objective O36</b> <b>Recommend</b> N/A
<i>traffic management</i>			
2	page 10	Proposed feeder road - combine this with pulling down the bridge by Christchurch School and you will take a lot of traffic out of town.	Support for removing traffic out of the town centre noted.
46		Conflict between 1) Local shopping centre 2) A safer town for our children. Church Street, Charlton Kings has been made a double yellow line zone with pedestrian crossing. Results: 1) Small shops are reliant on passing trade. Local shops will close. The village will die. 2) Vehicles travel faster because there are no parked cars - happening now! More chance of pedestrian deaths. 3) School children with teachers cross the road - but not on the pedestrian crossing - happening now!	Local plan seeks to protect local shopping facilities which meet the needs of local communities.  Detailed traffic management issues cannot be dealt with in the remit of the local plan. The Cheltenham Transport Plan considers these issues in more detail. <b>Local plan objective O25, O36</b> <b>Recommend</b> N/A
96		The proposed relief road to ease congestion on P.E. Way is essential and should proceed as well as plans to open up junction 10 of the M5. The residents of P.E. Way have had to put up with heavy traffic through their area for many years and the expansion of GCHQ and the new GLOSCAT site will make matters worse. The sacrifice of some Green Belt to accommodate the relief road and provide additional development land is regrettable but necessary for the town's development and	Comments noted.

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		continued prosperity.	
81		Each car used for private motoring in Cheltenham should be designated one day each week when it is not allowed on the roads. This could be done by colour, i.e. no red cars on Tuesdays. This would make enforcement easy for the police and/or traffic wardens. There would have to be signs at the entrances to the town to inform visitors of that days colour. I believe the public would co-operate as we are all concerned about the amount of traffic in Cheltenham.	Comments regarding traffic reduction within the town noted with interest. The transport strategy of the local plan recognises the need to promote sustainable travel patterns. The local plan will promote and provide facilities for park and ride, better integration of transport, and opportunities for walking and cycling. <b>Local plan objective O35, O36</b> <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan.
95		This town has the longest traffic lights. Quicker changing lights might help to keep traffic moving and make fewer queues.	Comments noted. The primary aim of most traffic signals is to prevent conflict between highway users at junctions, and many new signals incorporate an extra phase to facilitate safe pedestrian movement across the road. This may result in a longer duration for the red signal. It is an example of how a balance has to be struck to between providing for the needs of all users of the highway - not just motor vehicles - in a manner which promotes the sustainable objectives of the Cheltenham Transport Plan. <b>Local plan objective O25, O34, O35</b> <b>Recommend</b> N/A
183		<b>Gloucester City Council</b> Demand management needs to be done in a coordinated manner if developers are not to gravitate to the authority with the weakest policies. Gloucester City Council therefore strongly supports proposals to coordinate car parking policy (para 5.10) and requirement for travel plans (para 5.11).	Comments noted.
188	5.6	<b>Cheltenham Civic Society</b> Support. Relate to increasing traffic from Bishops Cleeve area, M5 Junction 10 (two way), GCHQ, possibly B&Q Hatherley relocation, Staverton Airport current and future use. Fist Phase A40 to A4019, phase 2 A4019 to A435 which requires a solution to the sensitive Swindon Village section.	Support for NWDR and call for sensitive design noted.
190	5.9  5.11	<b>Vision 21</b> Last sentence begins with words 'These might..'. V21 would like to see this changed to 'These will..'. This is surely a matter of fact and council does have plans in place to do things outlined later in sentence. Indeed it has already been taking steps on some of these issues for some time.  Would like to see clearer statement of intent that already reflects council practice. Change phrase in first line '..which may be prepared by..' to '..which will be required from..'	Point accepted. However, demand management measures which will assist in discouraging car use will vary from development to development. The local plan cannot therefore be prescriptive in identifying what will be required from all new development. <b>Local plan objective O33, O35, O36</b> <b>Recommend</b> the local plan will reflect the provisions of the Cheltenham Local Transport Plan.  Travel plans can help deliver sustainable transport objectives by promoting reductions in car use, increased use of walking, cycling and public transport, and environmentally friendly delivery and freight movements. Council practice, in common with PPG13, does not currently require travel plans to be submitted with all planning applications. <b>Local plan objective O35, O36</b> <b>Recommend</b> the local plan will promote the

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			preparation of travel plans through the development control process. Where new developments are expected to generate significant amounts of travel then the preparation of a travel plan will be required as a condition of any planning consent.
213	5.6	<b>Highways Agency</b> Key issues paper mentions that North West Distributor Road may help reduce congestion in that area. Council will need to consult the Highways Agency if this road is likely to impact upon Trunk Road Network.	Comments noted. <b>Local plan objective O33, O34, O35, O36 Recommend</b> the review of the local plan will require the submission of transport assessments alongside planning applications for major developments. Text will be revised to require development proposals which may generate additional traffic on the Trunk Road Network to prepare a traffic assessment on the impact of development.
217		Upgrading of M5 junction 10 should be a top priority before serious consideration of extra road building within the borough on the west side - more realistic traffic counts could then be undertaken. Your 'vision for the future' is admirable - let's hope we don't suffer undue pollution, frustration and avoidable injury in the meantime!  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Comments noted. The M5 core trunk road managed by the Highways Agency and as such is outside the scope of the council's direct control.
222	5.9	Disagree. There are ways in which the existing highway network could be improved, eg Bath Rd could be widened between Thirlestaine Rd and Sandford Rd without too much difficulty.	In many parts of the town there is limited, if any, scope to increasing highway capacity without detriment to the amenity of other road users, residents and the quality of the urban environment. Better traffic management is the most likely source of capacity improvements. In most circumstances the main beneficiaries will be public transport users, pedestrians and cyclists, in keeping with the Cheltenham Transport Plan's sustainable transport objectives. <b>Local plan objective O34, O35, O36 Recommend</b> the local plan will reflect the provisions of the Cheltenham Local Transport Plan, and findings of the Urban Design Framework.
228	5.3-5.9  5.6	Would be wrong for council to prevent any resident of the town freedom of movement around town. Bikes and walking cannot be a serious option. Cannot curtail freedom to use car until at least there is a regular accessible and user-friendly bus service covering all areas of town.  Agree strongly with need for North West Distributor Road unless alternative means of achieving same end can be found at lower cost. In addition, feel that Starvehall Farm link road will have many benefits over old Tatchley Lane Link proposal.	Whilst recognising the role of the private car, the local plan also recognises the importance of alternative modes of transport and traffic management in providing opportunities for movement around the town. The local plan will promote and provide facilities for park and ride, better integration of transport, and opportunities for walking and cycling.  The link road shown in Figure 7.4 of the Cheltenham Transport Plan is clearly described as illustrative only and subject to further examination. The Council requires that a planning application to develop the Starvehall Farm site should include a Environmental Impact Assessment and Transport Assessment. These are intended to inform the council in identifying the most suitable means of accessing the site and addressing inadequacies at the nearby junction of Tatchley Lane, Deep Street,

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	5.8	No point improving facilities for bus companies who will not run buses to time and/or unless they make a profit.	<p>Bouncers Lane and Prestbury Road. In doing so these assessments will need to review the case for the Tatchley Lane link, shown in the local plan adopted in 1997.</p> <p>Through the Cheltenham Transport Plan the Council is working with public transport providers through a Quality Bus Partnership to bring forward a more integrated and reliable bus network.</p> <p><b>Local plan objective O34, O35, O36</b>  <b>Recommend</b> the local plan will reflect the provisions of the Cheltenham Local Transport Plan, and findings of the Urban Design Framework.</p>
229	5.5-5.6	<p><b>Prestbury Parish Council</b> Proposed New Barn Lane/Prestbury Road link should go to full public consultation before considered for inclusion in Local Plan.</p> <p>NWDR should be removed - no likelihood of road being built within plan period (PPG12, 5.7), it will have a negative effect on major areas of town and increase rather than reduce traffic movement: Bypasses/distributor roads should not pass close to existing villages and should not be established by 'stealth', such tactics are against 'transparent' local government. Traffic generated within borough will not be reduced until a regular, reliable and comprehensive bus service is provided. Local Plan does not adequately address this issue.</p>	<p>Proposed link road between New Barn Lane and Prestbury Road will be open to public consultation when the local plan is placed on deposit during Summer 2002. The Council is expecting a planning application to be submitted prior to the local plan being placed on deposit, which will allow provide further opportunity for public consultation.</p> <p>The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes.</p> <p><b>Local plan objective O32, O35, O36</b>  <b>Recommend</b> Consider findings of reports which will consider transport case and planning considerations of NWDR concept.</p>
236		<p>Have some ideas on reducing traffic, as follows:</p> <ol style="list-style-type: none"> <li>1. Change working day: work with major employers to introduce policy of staggered working hours, eg 7-3.30, 8-4.30, 9-5.30 etc - could suit people much better than traditional 9-5.</li> <li>2. Change retail working day: encourage majority of shops to open from 10am to 6/7pm. Would cut down rush house traffic and also be more convenient for consumer.</li> <li>3. Working from home: work with major employers and also encourage public to ask employers about possibility of working from home. Can be feasible, particularly within technology industry.</li> </ol> <p>You will never encourage people to give up their cars, but with these ideas we could stagger rush hour effect and lead to generally less congested roads at traditional rush hour times.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For</i></p>	<p>The local plan provides the framework for land use issues. Whilst changes to the working day may assist in the distribution of traffic throughout the day, minimising the number of vehicles travelling at peak times, this is not an issue which can be addressed within the remit of the local plan. Opportunities for staggered working hours are issues which will considered by individual businesses, not one which the Council could enforce through the local plan. Proposals may cause peak spreading, adding to total daily traffic levels and jeopardising the viability of public transport services.</p> <p>The local plan will need to consider the changing nature of businesses and technology. Changing patterns within these sectors may have implications on the use of buildings/office space within the town.</p> <p><b>Local plan objective O5, O6, O7, O19, O20, O21, O35, O36</b>  <b>Recommend</b> the Council will take account of the findings of the Economic and Regeneration Strategy in reviewing employment policies of the plan and will seek to encourage home working through both voluntary and compulsory adoption of Travel Plans.</p>

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		<i>details please see report 'other comments'.</i>	
240	5.6	<b>Cheltenham Conservation Area Advisory Panel</b> Agreed in principal. Can be many objections to NWDR but overall advantage to town could be considerable. Major traffic problems revolve around commuting, but may change once full Park & Ride system operating and public transport improved. This leaves through traffic which would be better served with a NWDR and full access to M5 at Jn 10. New road should not provide another access for sporadic development, either industrial or domestic.	The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes Western)</b> Wilcon welcome a new relief road to north west of Cheltenham. With regard to submission of 'traffic plans' with planning application, suggested that these only be sought for developments over a certain size. Clear guidance also needed on information to be provided to reduce cost and delay in planning process.	See ref. 240. <b>Local plan objective O33, O34, O35, O36</b> <b>Recommend</b> the review of the local plan will require the submission of transport assessments alongside planning applications to assess the accessibility and impact of new developments which are considered likely to have a significant impact on the highway network for major developments.
287	5.6	<b>CPRE</b> Main concern about North West Distributor Road proposal has always been implication that housing development would be needed to finance it - diffused to some extent by subsequent decision by council. However, recognise that GCHQ and Gloscat developments in this part of town can only exacerbate traffic congestion during rush hours. Have taken note of differing views on how to solve this, as expressed in motions put to GCC by Councillors Cameron and MacDonald (attached with comment). Cllr Cameron's motion in particular seems to make good sense; we fear new road building without other measures would merely transfer congestion from one place to another. Whatever happens, believe traffic movements need to be evaluated through "departure/destination studies", not simply traffic movements.	Comments noted. <b>Local plan objective O32, O35, O36</b> <b>Recommend</b> Consider findings of joint borough/county reports which will consider transport case and planning considerations of NWDR concept.
292	5.6	<b>Gloucestershire County Council</b> County Council objects to the inclusion of the North West Distributor Road	See ref. 287.
294	5.6	Issue of north west distributor road should be removed from all sections of the Plan. Need to tackle traffic problems but solution lies outside scope of CBC acting on its own and other agencies must be called in to assist.	See ref. 287.
295	5.6	<b>Swindon Parish Council</b> Issue of north west distributor road should be removed from all sections of plan. Solution to traffic problems lies outside scope of borough council acting on its own and other agencies must be called in to assist. Para 6.11: use of term 'free' along with extensive and unregulated suggests it is wrong or to be deprecated. What is meant is	See ref. 287.

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305		<p>'not charged for'.</p> <p>Inner Circuit Road (St George's Rd/Gloucester Rd link): Use of this road in role of inner ring road (with its knock-on impacts on other routes) still needs to be assessed openly in comparison with other alternatives eg Ambrose Street route. Proposal to 'extrude' present compact inner ring road remains contentious as a routing and has still not been consulted upon per se. When inner ring traffic flowing through Tesco junction proves insufferable, existing distributor role of Ambrose Street route will have to be formally accepted as ongoing. Make that acknowledgement now.</p> <p>Inner Circuit Road (Montpellier/Bayshill Rd): Proposals will be ruinous for environmentally sensitive Montpellier. Inspector's Report from last local plan inquiry contains some decisive recommendations regarding creation of any middle ring corridors through eg Montpellier Terrace. Bayshill Road is the original 'heart' of the Conservation Area. it is not suitable for large vehicles or heavy traffic flows. What reports have been done and are available for examination on mechanical viability of routing juggernauts this way? Council needs to employ locally-knowledgeable 'urban design' personnel to resist engineer-generated schemes for routing more traffic through most environmentally sensitive parts of conservation area. Include revised routing of inner ring/circuit road as a local plan proposal, in order to benefit from formal examination and inquiry process, which a mere transport plan consultation can brush aside.</p>	<p>Demand management proposals to significantly reduce traffic levels through the town centre by making more use of the town's ring road were publicised in the draft Cheltenham Transport Plan and the draft Urban Design Framework, both of which have been subject to a high level of public consultation.</p> <p><b>Local plan objectives: O8, O24, O32, O35</b>  <b>Recommend:</b> consider provisions of Cheltenham Transport Plan and principles of the Urban Design Framework.</p>
<i>cyclling</i>			
6		<p>I do approve of all the proposals. In particular, cycle lanes. Perhaps a generation of children can be brought up on the bicycle rather than the car.</p>	<p>Comments noted.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> amend local plan polices to reflect the provisions of the Cheltenham Transport Plan which identifies cycling as an alternative to the private car.</p>
43		<p>Cyclists deserve a better network of cycle paths.</p>	<p>Cheltenham Transport Plan seeks to secure improvements to the cycle network of Cheltenham, including developing a cycle friendly highway network, and considering the needs of cyclist in new traffic schemes and new developments, with off-site works secured through planning obligations where appropriate.</p> <p><b>Local plan objective O35</b>  <b>Recommend</b> local plan will consider how the needs of cyclists can be met through new development, including the provision of measures and facilities by developers through high quality urban design and planning obligations. Adoption of SPG - Planning Obligations. The local plan will consider the objectives of the County and Borough transport plans and the need to allocate or safeguard land for the future provision of cycle</p>

Ref. No.	Para/ Section	Summary of Response	Project Nexus Recommendation
71		<p>I am a cyclist. I also live in the centre of town. I find it very frustrating that cyclists at present are prevented from:</p> <ul style="list-style-type: none"> <li>a. cycling along the High Street (past Marks &amp; Spencer)</li> <li>b. cycling along the Promenade (past Cavendish House)</li> </ul> <p>Pedestrians and cyclists CAN mix, so long as cycle lanes are clearly marked. I spent 3 years in Munich recently and know this works. If Cheltenham Town Council was truly in favour of encouraging use of the bicycle then cyclists would not be banned from cycling along the town's two main streets. Question: What is the Council going to do about this?</p>	<p>lanes.</p> <p>The local plan does not deal with detailed traffic management issues. Gloucestershire Local Transport Plan and Cheltenham Transport Plan consider the strategic cycle needs of the town, including existing and proposed facilities. The transport strategy of the local plan will seek to reflect these requirements to meet the objective of promoting sustainable transport choices. It recognises that cyclists need to be provided with attractive routes across the town centre. This may involve use of nearby streets as priority will be for pedestrians in areas of greatest pedestrian activity.</p> <p><b>Local plan objective O34</b> <b>Recommend N/A</b></p>
73		<p>You don't say very much about improving and extending the existing cycle routes and cycling priorities within the main urban centre of Cheltenham and it's feeder routes. I believe that the transport proposals should include many more dedicated cycleways which actually lead sensibly from one area to another and not from halfway down a road to halfway down another one!</p>	<p>Gloucestershire Local Transport Plan and Cheltenham Transport Plan consider the strategic cycle needs of the town, including existing and proposed facilities.</p> <p><b>Local plan objective O35</b> <b>Recommend</b> local plan will consider how the needs of cyclists can be met through <del>arising from</del> new development, including the provision of measures and facilities by developers through high quality urban design and planning obligations. Adoption of SPG - Planning Obligations. The local plan will consider the objectives of the County and Borough transport plans and the need to allocate or safeguard land for the future provision of cycle lanes.</p>
108		<p>As a cyclist I question the 'value for money' of cycle ways, like the one in The Park. It doesn't do anything for the cyclist ( it doesn't make me feel safer) or the motorist. Its there where there is room for it (and cars park on it) and where the isn't room, when its need most, there is no cycle way. Stick to creating cycle ways off the roads.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Comments noted.</p> <p>There is no single correct solution to providing a suitable infrastructure to encourage more cycling. In determining the most suitable approach to encouraging cycling the council follows the approach endorsed by the Institution of Highways and Transportation, DTLR and CTC in 'Cycle Friendly Infrastructure'. This considers a hierarchy of solutions which are dependent upon local conditions and broader traffic, environmental and planning objectives.</p> <p><b>Local plan objective O34, O35</b> <b>Recommend</b> the local plan will consider the objectives of the County and Borough transport plans and the need to allocate or safeguard land for the future provision of cycle lanes.</p>
109		<p>Make a continuous track around Cheltenham, with numerous cycle roads also within the perimeter track. All cycle tracks to be paved red with a cycle painted at each start or junction, or ideally a metal sign showing walker and cyclist. If you had not wasted so much money on that stupid 'Noddy Train' (ordered by the Lib Dem majority in Council) there would be funds to do the cycle track properly. Have arrows painted at each junction if the cycle track is two way.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For</i></p>	<p>Comments noted. See above.</p> <p>Gloucestershire Local Transport Plan and Cheltenham Transport Plan consider the strategic cycle needs of the town, including existing and proposed facilities.</p> <p><b>Local plan objective O34, O35</b> <b>Recommend</b> See ref. 108.</p>

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		<i>details please see report 'other comments'.</i>	
188	1.5  5.8	<b>Cheltenham Civic Society</b> Travel by 'cycle' to be essentially safe. Cyclists to have bells fixed and used as warning particularly to pedestrians - address problems of footpath dual use - pedestrian/cyclist.  Existing cycle network requires revisions, use safety and destination security vital.	The legal requirement to fit a bell or enforce its use is outside the remit of the local plan and requires government legislation.  The provision of safe facilities for cyclists is an important element of an integrated transport system. See above response. <b>Local plan objective O34, O35</b> <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan which identifies cycling as an alternative to the private car.
217		I notice on the proposed cycle network map opposite p40 of the revised Transport Plan that the cycle path only goes as far as the railway bridge at the junction of Church Road and Wymans Lane. This should be extended along the length of Hyde Lane to Smiths Industries plus an improvement to Hyde Lane (one or two intrepid cyclists risk their lives along this road at the moment.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Gloucestershire Local Transport Plan and Cheltenham Transport Plan consider the strategic cycle needs of the town, including existing and proposed facilities. <b>Local plan objective O35</b> <b>Recommend</b> local plan will consider how the needs of cyclists can be met through new development, including the provision of measures and facilities by developers through high quality urban design and planning obligations. Adoption of SPG - Planning Obligations. The local plan will consider the objectives of the County and Borough transport plans and the need to allocate or safeguard land for the future provision of cycle lanes.
295		<b>Swindon Parish Council</b> Congratulations on achieving one of the highest levels of cycling in the country, however a lot of money is being spent to benefit very few people.  Provision of cycle and bus lanes has reduced the appeal of the wide footways and roads which form the approaches to the town.  In some instances the push to provide cycle paths has overshadowed the needs of pedestrians. Segregate pedestrians from cyclists and improve pedestrian safety to encourage more walking.  Cycle paths on footways are unpopular with children. Remove cycle paths from parks, such as Sandford Park, which are for playing.	PPG13, RPG10 (Regional Planning Guidance for the South West), the Gloucestershire Local Transport Plan and the Cheltenham Transport Plan advocate a greater role for cycling in a more sustainable transport system. The benefits of increased cycle use are widespread - it is a socially inclusive, non-polluting, healthy form of transport which poses a minimal hazard to other highway users and which uses less land for routes and parking.  Cheltenham's compact size and gently undulating topography make it well suited to cycling. The Cheltenham Transport Plan details how, in consultation with the Cheltenham Cycle Campaign and within the context of the Local Transport Plan, the council aims to increase cycle levels by providing a more cycle friendly town, an attractive cycle network and by considering the needs of cyclists in new development.  The council's approach used to determine the most appropriate measure to promote cycling is based upon one advocated by the Institute of Highways and Transportation, Cyclists Touring Club and DTLR. This recognises that there is no single correct solution to providing a suitable infrastructure to encourage cycling, as much depends upon broader traffic, environmental and planning objectives.  This approach also acknowledges that the cyclists have a varying levels of competence. Off-road



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			<p>segregated routes which appeal to novice cyclists may be seen as slow, unappealing and less safe by more confident commuters.</p> <p>The cost of measures to encourage cycling pales by comparison with other less sustainable transport schemes. Furthermore, the benefits often apply to non-cyclists, with traffic calming schemes creating a safer environment for pedestrians and local residents, and increased cycling helping to reduce road traffic emissions.</p> <p><b>Local plan objective O34, O35</b>  <b>Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan which identifies cycling as an alternative to the private car.</p>
305		<p>Proposals for Cheltenham Cycle Network need to address all parts of town, even if their implementation is phased. Shared pavement-cycletrack in Up Hatherley Way has never been implemented and needs to be progressed. Another long-range cycling opportunity is the Greatfield Lane-Farmfield Road-Kidnappers Lane route. Plans put out for consultation should be precise and comprehensive, not sketchy. If Cheltenham wants a genuinely comprehensive cycling network, it should abandon strategy of 'mixing' cyclists with fast-flowing vehicles on major routes. Cheltenham has far more cycling potential if strategy were for truly quiet and go-everywhere network.</p>	<p>Comments noted. See ref. 295.</p>
<i>bus interchange</i>			
26		<p><b>Simon Pontifex &amp; Associates</b> The proposal for a linear bus stop along Albion Street is an excellent one. This would provide easy access to the town centre for all, including the disabled.</p>	<p>Comments noted  <b>Local plan objective O24, O32, O35</b>  <b>Recommend</b> consider provisions of Cheltenham Transport Plan and principles of the Urban Design Framework.</p>
100		<p>You talk about improving the public transport system, but there is no mention of a proper bus interchange in the town to make easier journeys. I think of Evesham, Gloucester, Worcester and Stroud, all much more convenient. Cheltenham is very backward in this important aspect.</p>	<p>The local plan recognises that improvements to Royal Well bus station are required over the plan period. Improvements may include relocation to an alternative site within the town centre. Development briefs covering the area of St. Margaret's, and Gloucester Place, Sherborne Place and Fairview Road identify opportunities for the development of a public transport interchange within these areas. The review of the local plan will consider the findings of the Urban Design Framework which considers the movement of public transport through the town centre.</p> <p><b>Local plan objective O24, O35</b>  <b>Recommend</b> see ref. 26.</p>
103		<p>Royal Well, High Street, Promenade, Pittville Street, Winchcombe Street, Clarence Street. What have all these thoroughfares got in common? They are starting points for town and country buses, yet we have a perfect site to house them all on the Black and White coach station site. This area could house information bureau, toilets, waiting room etc. Any other town in Britain would have</p>	<p>Comments noted  <b>Local Plan objective O24, O35</b>  <b>Recommend</b> see ref. 26.</p>

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		developed this immediately when it became vacant. Do we worship the car like a God in this town?	
124		We need a major new project to build an up to date bus station in Royal Well, covering all requirements for coaches, taxis and parking. The object - to make the promenade pedestrian only and restoring it as the best town centre in the country. Why have we allowed people to ruin it?	Comments noted <b>Local Plan objective O35</b> <b>Recommend</b> see ref. 26.
229	para 5.8	<b>Prestbury Parish Council</b> Essential that bus and coach station, with taxi rank, is provided, ideally in centre of town.	See ref. 26.
303	5.8	We still have a coach station - derelict site being used for car parking.	Comments noted. See ref. 26.
<i>rapid transport system</i>			
73		<p><b>LIGHT RAIL TRANSIT:</b> Now that the Gloucestershire/Warwickshire Railway is opening its route from Toddington to Cheltenham Racecourse within the next 12 months, now is an excellent time to consider building a Light Rail Metro System on the old GWR route from Lansdown, Cheltenham Spa Railway Station to the Racecourse, serving the new leisure/restaurant/shops/hotel centre on the old abattoir site on the Gloucester Rd, the St James complex (when built), the High St and the Racecourse. Consideration should be given to doing this with the Gloucestershire/Warwickshire Railway, Railtrack (when they have recovered!) and Central Government, who are much in favour of metros. As the old Honeybourne Line was double tracked, there is plenty of room to retain the cycle and walkway.</p> <p>This project would remove the terrible congestion at the station and roads to Pittville on race days, particularly in National Hunt Week, provide pollution free public transport to the town centre and the new complexes being built along the way and boost tourist traffic to Cheltenham, our Heritage Railway and later to Broadway and Stratford when the line is complete.</p>	<p>The adopted local plan safeguards the Honeybourne Line for the potential future development of a rapid public transport system. The Council continues to support this safeguarding policy as a mechanism to promote an innovative and sustainable transport scheme which would provide an alternative to the private car.</p> <p><b>Local Plan Objective O35</b> <b>Recommend</b> no change.</p>
78		<p>With new developments like the GCHQ building, and the increasingly dire congestion, it is an ideal time to connect Cheltenham and Gloucester, along with key sites by a tram.</p> <p>To rely on buses will not succeed. People do not like them, and vast swathes of the population, generally the car owning ones will never use them. I cycle by the racecourse park and ride daily on my way to work, invariably it looks deserted. I urge you to think again, be bold and radical - have the courage to actually change things.</p>	<p>The transport strategy of the local plan recognises the pressure placed upon the town by the private car and the need to provide more sustainable transport choices for commuters, shoppers and visitors to the town.</p> <p>The plan places an emphasis on the provision of Park and Ride sites in promoting sustainable travel patterns, supported by improvements in public transport services and facilities, walking and cycling. In addition the local plan will continue to safeguard the Honeybourne Line from development to enable future provision of a rapid transport system.</p> <p><b>Local plan objective O35</b> <b>Recommend</b> no change</p>

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295		<b>Swindon Parish Council</b> How can the disused Honeybourne Line be integrated into transport proposals?	See ref. 73
<i>rail</i>			
122		<p><b>Stratford Rail Transport Group</b> We object to the continuing failure to recognise the proposed restoration of the Cheltenham - Honeybourne - Stratford railway, for heavy rail, passenger and freight services, as part of the national rail network. The failure to even mention rail services in the transport section, is itself a serious omission.</p> <p>Restoration of this railway has a high profile reference in the Railtrack 2000 Network Management Statement, by 2009/10. Support for restoration has now been given by Railtrack, EWS, Thames Trains, Virgin Trains, Gloucestershire County Council, Solihull Metropolitan Borough Council, The Rail Passenger's Committee and the Rail Freight Group.</p> <p>PPG12 para.5.23, states that local authorities should consider the potential of disused trackbeds for possible future transport schemes, including rail (passenger and freight) as well as light rail, and apply appropriate protective policies. Similar guidance is detailed in PPG13, para. 45 and 74. Clearly the local plan is primarily a land use planning document and the removal of a bridge and part of an embankment as part of the St. James redevelopment, cannot be seen as complying with the requirement of PPG12 and PPG13 in terms of protecting the trackbed or making reinstatement of the railway easier at a future date.</p> <p>The issues paper also fails to comply with the Gloucestershire LTP, para.5.3.3 and the Passenger Rail Strategy, para 5.3.5 which states that ' in the longer term promote the option of opening a new station near Cheltenham town centre and the reinstatement of a short spur from Lansdown junction to the St. James' area', and 'work with Railtrack, operating companies and other local authorities to evaluate the proposals of restoring through rail traffic to the Honeybourne Line'.</p> <p>The local plan, and in particular, policy TP131, will therefore need to be revised to recognise the proposed restoration of this route for heavy rail use, passenger and freight and provide meaningful protection of existing physical infrastructure, I.e. trackbed and bridge structures, from prejudicial development.</p>	<p>The local plan review continues to safeguard the route of the Honeybourne Line as a potential public transport corridor, providing a rapid transport system serving the Gloucester-Cheltenham corridor and Bishops Cleeve. This reflects the provisions of government guidance which requires that local plans should address the land use implications of the local transport plans (PPG12/13).</p> <p>Gloucestershire Local Transport Plan sets out that it will, in the longer term promote the option of opening a new station. The provisions of the local plan do not prejudice this work.</p> <p><b>Local plan objective O35</b> <b>Recommend</b> no change</p>
140		As well as working with the rail operators to	Comments noted. Gloucestershire Local Transport

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		<p>improve the quality of intercity services, the station buildings themselves should also be addressed. Cheltenham Station is scruffy with poor facilities. For many tourists the first view they have of Cheltenham would be the station. it is not particularly welcoming and does not present a good impression of the town. Local people and commuters would benefit from improved station facilities and appearance.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>Plan and Cheltenham Transport Plan identify the problems associated with the quality of the environment of Cheltenham Railway Station.</p> <p><b>Local plan objective O28, O33</b></p> <p><b>Recommend</b> the local plan will incorporate the measures set out in the Transport Plan where appropriate.</p>
160		<p><b>Cotswold Line Promotion Group</b> Our Rail User Group has always been anxious to see the eventual restoration of the Stratford-upon-Avon to Cheltenham railway and our views are now shared by rail operators, county councils, district councils, borough councils and, significantly, by the rail watchdog The Rail Passengers Committee.</p> <p>Rail freight operators are particularly anxious to be provided with an additional route to the north and reopening featured in last year's Network Management Statement by Railtrack which, until the tragic event at Hatfield, was in a position to carry out reinstatement work. Restructuring of the industry could well enable this to occur in the medium to long term future.</p> <p>Our Group was surprised that your plans make no reference to rail transport, nor to the desire of so many bodies to see that the trackbed of this former mainline, safeguarded for future use as a transport corridor - hopefully, a rail route forming part of the national network again and fulfilling a role in reducing freight traffic on our already overcrowded roads.</p> <p>We would urge that your Local Transport Plan be revised to include positive plans for the former Stratford-Cheltenham route and for the longer term to be taken into account. As a first step, we feel that it is essential that the trackbed of this route be protected from any development which would hamper eventual reopening. When the A44 Broadway bypass was constructed recently, it was heartening to see that the planners provided a 'bridge' where the road crossed the railway trackbed. Such a policy should, we urge, be followed elsewhere along the route.</p>	See ref. 122.
164		<p><b>Railway Development Society</b> The Committee of the Midlands branch wishes to object to the failure to take account of the proposed restoration of the Cheltenham-Honeybourne-Stratford railway, for passenger and freight services, as part of the national</p>	See ref. 122.

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		<p>network. We note with dismay the failure to even mention rail in the Transport section.</p> <p>The Railway Network Management Statement 2000 gives the restoration of this railway (Route 7 Derby-Bristol/Discot refers) a high profile reference for action by 2009/10. Support for restoration has been given, amongst others, by Railtrack, EWS, Thames Trains, Virging Trains, Centro, Solihull Metropolitan Borough Council, the Rail Passenger's Committee (West of England) and the Rail Freight group.</p> <p>PPG12, Development Plans, 1999, para 5.23 states clearly that local authorities should consider the potential of disused trackbeds for possible future transport schemes and apply suitable protective policies. Such schemes must include rail, both passenger and freight. PPG13, Transport, 2001, paras 45 and 47 contains similar guidance. The removal of a bridge and part of an embankment as part of the St James redevelopment cannot be seen as complying with these requirements. Furthermore, the Gloucestershire Local Transport Plan 2000 clearly states the long term intention to "work with Railtrack, operating companies and other local authorities to evaluate the proposals of restoring through traffic to the Honeybourne Line."</p> <p>We therefore ask that the Local Plan and in particular Policy TP131 be revised to recognise the possible restoration of the Cheltenham-Honeybourne-Stratford line for heavy rail use and provide appropriate measures to protect the existing infrastructure from prejudicial development.</p>	
214	5.3 5.7-5.9  8.5/6	<p><b>Railtrack</b> Rail is not mentioned in this section. Whilst Council rightly notes town as major employment and shopping centre, it fails to identify that, as such, the promotion of rail must form part of the local plan's initiatives for the town.</p> <p>The Transport Strategy fails to include rail as an alternative to the private car where improvements could be made. Strategy should include potential improvement to rail services and facilities within the Borough as well as the possible development of rail based park and ride, and the integration of rail and bus services.</p> <p>Strategy fails to identify sustainability benefits of locating development to take maximum advantage of public transport interchanges and links, and fails to identify Cheltenham Railway station as an interchange location.</p>	<p>Comments regarding promotion of rail as an alternative to the private car noted.</p> <p><b>Local plan objectives O6, O35, O36</b></p> <p><b>Recommend</b> Cheltenham Spa Station provides good connections to London, the South East, the Midlands and North, and South East Wales. The transport strategy of the local plan will be revised to recognise this facility in providing opportunities for commuter journeys, and more local journeys in and around Gloucestershire, reflecting the local plan transport objectives set out in the Draft Development Strategy.</p> <p>However, the plan must also take into account the problems associated with the out of centre location of the train station and quality of environment which the station and its facilities provide. The plan will consider how integration of alternative transport modes, including walking, cycling and public transport can assist in improving links between the train station and the town centre.</p>

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216		<p><b>6024 Preservation Society Ltd.</b> We made representations and objected to the lack of a positive, coherent policy towards rail transport in the initial Local Plan consultation and first review. We are now most concerned that there is still a failure to recognise the proposed restoration of the Cheltenham-Honeybourne-Stratford-upon-Avon railway line for heavy rail services.</p> <p>The restoration of the route for heavy rail passenger and freight was highlighted in the Railtrack network management statement for the last two years and has wide ranging support from all train operating companies in the region and positive support from district and county councils along the route. Indeed, the Broadway bypass construction provided for a double track over bridge (to dimensions suitable for the continental loading gauge) prior to restoration.</p> <p>The lack of a positive policy in the Cheltenham Borough Local Plan is a serious omission, contrary to PPG12 and ignoring guidance in PPG13, in fact we are convinced that the lack of positive policy is in blatant disregard of government guidelines for future transport use. Therefore, the Local Plan and Policy TP131 should be revised to actively promote restoration of this strategic route for heavy rail use and protect the infra-structure from further erosion, providing the electorate of Cheltenham with a sustainable, environmentally friendly form of public transport.</p>	<p>The local plan review continues to safeguard the route of the Honeybourne Line as a potential public transport corridor, providing a rapid transport system serving the Gloucester-Cheltenham corridor and Bishops Cleeve. This reflects the provisions of government guidance which requires that local plans should address the land use implications of the local transport plans (PPG12/13).</p> <p><b>Local plan objective O35</b>  <b>Recommend no change</b></p>
237		<p><b>Stratford on Avon, Broadway Railway Society 1999 Ltd.</b> We made representations and objected to the lack of a positive, coherent policy towards rail transport in the initial Local Plan consultation and first review. We are now most concerned that there is still a failure to recognise the proposed restoration of the Cheltenham-Honeybourne-Stratford-upon-Avon railway line for heavy rail services.</p> <p>The restoration of the route for heavy rail passenger and freight was highlighted in the Railtrack network management statement for the last two years and has wide ranging support from all train operating companies in the region and positive support from district and county councils along the route. Indeed, the Broadway bypass construction provided for a double track over bridge (to dimensions suitable for the continental loading gauge) prior to restoration.</p> <p>The lack of a positive policy in the Cheltenham Borough Local Plan is a serious omission, contrary to PPG12 and ignoring</p>	<p>See ref. 122.</p>

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		<p>guidance in PPG13, in fact we are convinced that the lack of positive policy is in blatant disregard of government guidelines for future transport use. Therefore, the Local Plan and Policy TP131 should be revised to actively promote restoration of this strategic route for heavy rail use and protect the infra-structure from further erosion, providing the electorate of Cheltenham with a sustainable, environmentally friendly form of public transport.</p>	
238		<p>I made representations and objected to the lack of a positive, coherent policy towards rail transport in the initial Local Plan consultation and first review. I am now most concerned that there is still a failure to recognise the proposed restoration of the Cheltenham-Honeybourne-Stratford-upon-Avon railway line for heavy rail services.</p> <p>The restoration of the route for heavy rail passenger and freight was highlighted in the Railtrack network management statement for the last two years and has wide ranging support from all train operating companies in the region and positive support from district and county councils along the route. Indeed, the Broadway bypass construction provided for a double track over bridge (to dimensions suitable for the continental loading gauge) prior to restoration.</p> <p>The lack of a positive policy in the Cheltenham Borough Local Plan is a serious omission, contrary to PPG12 and ignoring guidance in PPG13, in fact I am convinced that the lack of positive policy is in blatant disregard of government guidelines for future transport use. Therefore, the Local Plan and Policy TP131 should be revised to actively promote restoration of this strategic route for heavy rail use and protect the infra-structure from further erosion, providing the electorate of Cheltenham with a sustainable, environmentally friendly form of public transport.</p>	See ref. 122.
295		<p><b>Swindon Parish Council</b> Concern that an increase in rail traffic would result in more traffic queues at railway crossings, adversely affecting parishioners.</p>	<p>Comments noted.  <b>Local plan objectives O35, O36</b>  <b>Recommend</b> amend local plan to reflect the provisions of the Cheltenham Transport Plan.</p>
<i>pollution (see also built environment)</i>			
45	P7	<p>Air pollution. Majority of pollution caused by motor vehicle - true - mostly buses. If you ever cycle behind one you'll know what I mean. Another cause is vehicles constantly having to rev-up after traffic light stops, after slowing for 'sleeping policemen'. Any method which regulates a steady traffic flow would be preferable.</p>	<p>Motor vehicles are the main source of air pollution in Cheltenham however existing and projected levels of air pollution fall below levels which would require the council to establish air quality management zones. The provisions set out in the Cheltenham Transport Plan seek to address air quality through travel minimisation, traffic management and promotion of more sustainable forms of travel than the private car.  <b>Local plan objective O16</b></p>

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			<b>Recommend</b> amend policies to reflect provisions of Cheltenham Transport Plan and to reduce the need to travel.
180		<b>Environmental Protection Manager, Cheltenham Borough Council</b> para 4.06 on sustainable development and para 5.09 on transport plan objectives refer to protecting the environment in general terms. The recent air quality review and assessment identified some transport corridors which are close the government's air quality objectives. The predictions of future air quality allowed for around 10% increase in traffic flow. In order to protect the air quality environment of Cheltenham I propose that an air quality impact assessment is required as part of the transport assessment at 5.46 for large development plans. Those developments or groups of developments where an increase in traffic flow of 10% or greater is anticipated could usefully be included. Perhaps this would take the form of supplementary planning guidance?	Comments noted. <b>Local plan objective O16</b> <b>Recommend</b> local plan will consider the type of information required from developers to assess development proposals. Consideration of air quality issues will be required where proposals involve an increase in traffic flows. Transport assessments will be required to include information on air quality.
190	5.1 5.6	<b>Vision 21</b> We note Council's acceptance of congestion and pollution but cannot accept suggestion that a North West Distributor Road is realistic solution. All available evidence clearly shows that new roads may provide temporary relief of congestion in one area but always lead to increase in traffic in medium to long term.	The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes.  The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.
278		Park & Ride proposals aim to keep pollution out of town however experience in some other towns is that a frequent bus service converging on a small area increases many fold the pollution at the point where the buses stop for any length. Compare this with private car drivers whose aim is to go to their destination, park and switch off their engines. Given sufficient car parking spaces then pollution is minimised. Inadequate provision leads to increased pollution.	comments noted.
295		<b>Swindon Parish Council</b> As pollution reduction is a key element of the transport plan we need more information on the relationship between air pollution levels and health and also the effects of Park and Ride, more public transport services, traffic management and traffic calming on CO <sub>2</sub> emissions and local air quality.  Provide more details of the National Air Quality Objectives, test data and results of	The Council's work monitoring and assessing air quality in the borough is summarised in Chapter 6 of the Cheltenham Transport Plan and in the December 2000 Review and Assessment of air quality. This concluded that national air quality objectives are likely to be met at locations where people might be exposed to harmful levels of pollution. A further review in 2003 will check progress towards meeting these targets. Measures which could alleviate air pollution problems include traffic management measures,



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		<p>work towards production of a Local Air Quality Strategy.</p> <p>Better use of the highway network could resolve much of the congestion and this should be done before expensive new roads are built.</p>	<p>travel plans and the promotion of public transport, park and ride, walking and cycling.</p> <p><b>Local Plan Objectives O16, O35, O36</b>  <b>Recommend</b> amend local plan to reflect Cheltenham Transport Plan.</p>
<b>Issue 6 Town Centre</b>			
<i>general</i>			
101		The more I read the Clarion, the more attractive Cribb's Causeway becomes.	<p>The local plan recognises the competition faced by the town centre from shopping facilities elsewhere. The local plan review will consider how the town centre can be supported through policies which strengthen the retail function of the town and create a high quality environment which is easily accessed by a range of transport modes.</p> <p><b>Local plan objective O24, O25</b>  <b>Recommend</b> consider the findings of the Urban Design Framework and findings arising from town centre health check.</p>
167	6.1 - 6.3	<p><b>Town Planning Consultancy</b> These paragraphs seek to enhance and project the shopping element of Cheltenham. However it should also be acknowledged that existing retail locations also play an important role in retail hierarchy of Cheltenham and needs to be protected. In addition, extant consents also need to be recognised as these will contribute to retail provision of Cheltenham. For example, an extant consent for retail exists at GCHQ Oakley, this should be identified in the emerging local plan.</p>	<p>An objective of the local plan seeks to maintain and enhance the vitality and viability of the town centre as a sub regional shopping centre, and maintain the diverse range of local shopping facilities within the town. The local plan will seek to protect the retail hierarchy of Cheltenham. However, where new retail development is proposed the Council will apply the sequential test in determining the most sustainable location for development.</p> <p>Land at GCHQ, Oakley received consent for 10 year approval of reserved matters on 22.4.99.</p> <p><b>Local plan objective O25</b>  <b>Recommend</b> amendments to policies RT87 New local shopping centres, and RT89 Corner shops</p>
188	6.7	<b>Cheltenham Civic Society</b> Support development briefs but they must be positive.	Objective of development briefs prepared by the Council is to provide positive guidance to developers, outlining what the Council would expect from development proposals.
193	6.7	<p><b>Countryside Agency</b> Pleased to note that borough council will require development briefs for its Key Development Sites. Such briefs increase opportunity for comment and can give positive role to communities directly affected by proposed development. Development briefs also allow council to give clear indications of what it expects from developer and can be used to encourage high quality applications which integrate with surrounding area and services.</p>	Comments noted.
229	6.3	<b>Prestbury Parish Council</b> High quality small and specialist shops should be encouraged as they provide a special identity for the town.	Comments noted.
239	6.3	Shopping may still be one of attractions but this is on the wane. Town is gradually becoming like every other English town - same chain stores. Encouraging small/medium sized retailers would probably help to halt deterioration of shopping reputation.	Comments noted.
240	6.4	<b>Cheltenham Conservation Area Advisory</b>	Urban Design Framework commissioned by the

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	6.7  6.8	<p><b>Panel</b> Latham report very welcome. Would seem logical for Second Review to have been prepared in tandem with this. Otherwise possibility of critical aspects of design framework conflicting with aspects of this pre-determined Review.</p> <p>Development briefs coordinated with urban design framework essential if future development in town to reach standard expected from this report. Public consultation necessary but not always adequately informed or capable of assessing larger picture.</p> <p>Car parking use of some of Council's land should not necessarily inhibit Council from using such space for other purposes. More important to integrate town as a viable centre than to slavishly follow car parking policies. Need for car parking in centre should in any case be drastically reduced if public transport system adequately financed and provided, and would also help to clear many residential areas of on-street office parking.</p>	<p>Council to assist in informing the local plan on the approach to urban design within the town. The Framework will be revised following public consultation and will be presented to the Cabinet for adoption as supplementary planning guidance. Where development briefs are proposed, these will be prepared taking into account the findings of the Urban Design Framework. Development briefs already adopted by the Council will be considered within the provisions set out in the Framework.</p> <p>The local plan retains the overall number of spaces with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. The plan supports the use of park and ride services which meets the needs of long stay visitors.</p> <p><b>Local plan objective O3, O6, O7, O11, O35, O36 Recommend</b> amend local plan policies to reflect the provisions of the Cheltenham Transport Plan, consider findings of Urban Design Framework, update development briefs where appropriate.</p>
241		<p><b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon welcome development briefs produced to date for redevelopment areas within borough.</p>	<p>Comments noted.</p>
293		<p><b>Peacock &amp; Smith (on behalf of WM Morrison Supermarkets plc.)</b> Consider that Local Plan Second Review should identify and allocate sites for new retail development by type, and in particular for a large new food superstore. Such identification should be based on the sequential approach (in-town-centre, edge-of-centre, out-of-centre). A criteria based policy should also be operated in order to accommodate uncertainty and introduce necessary flexibility over Plan period. Sites identified should comply with criteria set out at PPG6 para 1.12. In this respect, council should consider action local authority will take to accelerate process of bringing sites forward, in accordance with advice set out at PPG6 para 1.2.</p> <p>Wm Morrison Supermarkets consider best approach to be, first, by identifying need and amount and type of floorspace required to meet that need; and second, by then identifying sites (using a sequential approach) to meet requirements of that need. In circumstances where land with sufficient physical, highways and environmental capacity exists to secure an agglomeration of facilities, interactive benefits of such provision and sustainability in accessibility terms should be considered.</p> <p>Whilst Wm Morrison Supermarkets support</p>	<p>See ref. 101. Consideration of proposals for the development of food retailing adopt the sequential approach set out in PPG6. This approach will be reflected in the local plan review, supporting the retail hierarchy of the town, and promoting sustainable development.</p> <p>Local plan policies will support the development of retailing in appropriate locations. It is not however an objective of the local plan to determine the needs of the market.</p>

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		<p>general principle of encouraging a broader range of activities in town centres, they consider that primary function of town centres is to provide retail facilities and services. In this regard, if a need for a certain type of retail development is identified (eg a food superstore) then a suitable site or sites should be identified and allocated to accommodate that particular type of development, before additional uses are permitted or encouraged. It is considered that allocation of such sites for "mixed use" development may preclude their development for the intended main use, particularly if they are not large enough to accommodate the intended use for which a need has been identified together with a range of other uses.</p>	
303	6.4	<p>In view of fuss over appearance of the Promenade, fail to understand why cars permitted to park on road or indeed on the paving - paving slabs constantly being broken. Perhaps this is a case for a proposal for the improvement of the built environment. Would also reassure residents who are tired of funding endless repairs to the Promenade whilst their own roads are neglected.</p>	Comments noted.
305	6.1	<p>'Town centre' needs one or more definitions. If here it means the 'Core Commercial Area' then that is not the primary repository of "Regency architecture".</p>	<p>The 'town centre' is a general term and does not refer to the specific policy area defined as the 'Core Commercial Area'. It is agreed that substantial areas of Regency architecture lie outside the town centre, but the statement that the town centre contains much of the town's Regency architecture and townscape is correct.</p>
<i>evening economy</i>			
9		<p>Night-clubs for 20's and over should stop - too many, also too many drinks clubs - 3 new ones opened - rubbish, should think of the younger people about 8-15 years of age. Come along and think of the poor people for once in your lives and the poor kids with nothing.</p>	<p>The plan recognises the importance of the night time economy, however the review of the plan will consider how these uses should be controlled to ensure personal safety and protect the quality of life for residential areas within the town centre. <b>Local plan objective O3, O4, O19, O20, O26, O27</b> <b>Recommend</b> Consider findings of report 'Evaluation of Cheltenham Night Life Economy' prepared by Cheltenham and Gloucester College of Higher Education.</p>
24		<p>Far too many large pubs/clubs.</p>	See ref. 9.
116		<p>Not sure about 'Vibrant Night Life', the way night-clubs have proliferated within the town. Night-clubs may have an annual turnover estimated to be within the range £21 to £31 million, but at considerable cost to any night time dignity of the environment. How does one equate serious tourism with the young clubber's scene?</p> <p>Recent surveys have reported that clubber's require late night/early morning take away stalls, together with convenient portaloo's. Who would pay for cleansing discarded food waste etc., before commencement of yet</p>	See ref. 9.

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		another working day? Visualise all those tourists treading delicately around 'whatever' on their way along the Promenade. Such a scenario could come under a heading 'How to successfully shoot yourself in the foot'.	
139		The Council is obviously interested in commercialism. For myself and many others, Cheltenham centre is a 'no-go' area after early evening. Night clubs for the young bring out unruly elements, such that it is not safe.	See ref. 9.
190		<b>Vision 21</b> Key issue is night time economy and its impact on quality of life of town overall. V21 would like to see this flagged up at this early stage.	See ref. 9.
222	3.12	Concerning the night time economy, the Local Plan Review should try to encourage diversification to promote more non-alcohol based entertainments in the city centre.	Comments noted. <b>Local plan objective O19, O20, O27, O28</b> <b>Recommend</b> local plan will support development which adds to the economic vitality of the town, and provides for the needs of residents and visitors. The local plan will seek to control development which would have an adverse impact on the amenity of residents within and close to the town centre.
228	3.10  3.11	Centralisation and lack of policing makes centre of Cheltenham a 'no-go' area for many. More controls needed within licensing and balance between profits to club owners and cost to town for cleaning and policing.  Fully support an assessment of the night time economy of Cheltenham.	See ref. 9.
273		Welcome fact that further assessment going to be made in this area. Borough council has opportunity to create and build on the established night time economy in a way which would secure an '18' hour day with a variety of things on offer for all generations.	Comments noted.
278	3.11	Night time economy: effect on residents in all areas of town must be fully considered. It is hoped that all residents and businesses in all areas are consulted when council initiate assessment.	Comments noted.
283		<b>Cheltenham Friends of the Earth</b> Current development pattern of night time economy is undermining town's attractiveness as a place to live, work and play, and yet encouraging greater town centre living is one of aims of plan. Recent study on impacts of night time economy woefully inadequate, giving little real consideration to impact on local population, businesses or the environment. Local plan must help to ensure that night time economy only develops in a way which support quality of life in Cheltenham as a whole and which support wider objectives of plan.	See ref. 9.
295	3.11	<b>Swindon Parish Council</b> Effect on residents in all areas of town must be fully considered. It is hope that all residents and businesses in all areas are consulted when council initiate assessment mentioned.	Comments noted.

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<i>location of development</i>			
1		<p>I am surprised that in view of the traffic problems (particularly the one-way system for visitors) that your planning department allows the building of supermarkets in the town (for example the new Waitrose supermarket at the junction of Market Street and Gloucester Road). This means that people coming from the east and south have to traverse Cheltenham to get there.</p>	<p>Planning Policy Guidance prepared by the Government requires local authorities to apply a sequential approach when considering retail development. This means that all town centre options should be considered before less central sites. The traffic implications relating to the Waitrose development were carefully considered by the Officers and Members of the Council at Planning Committee.</p> <p><b>Local plan objective O6, O7, O20, O24, O35, O36</b>  <b>Recommend no change</b></p>
211		<p><b>Roger Tym &amp; Partners (on behalf of Somerfield Stores Ltd)</b>, who operate four stores in Cheltenham. Have the following response to the Cheltenham Borough Local Plan:</p> <p>Support thrust of both adopted policy and proposed policies, insofar as they conform with government guidance on retail planning as set out in PPG 6 Town Centres and Retail Developments and guidance on integration of development and transport as set out in PPG 13.</p> <p>However, PPG6 refers to need for local authorities to consider whether there is need for new development before adopting a sequential approach to site selection. [Quoted Annex B, paras 8 and 9 of PPG6]. Thus compliance with PPG6 requires that local authorities should undertake an assessment of need for new development, based on up-to-date survey information.</p> <p>In paras 4.39-4.46 of the Development Strategy, which refers to Town Centre strategy, note there does not appear to be any reference to completion or current/future undertaking of an assessment of the need for new development. Also note that there do not appear to be references to any similar work having been carried out in the currently adopted Cheltenham Borough Local Plan of 1997. We therefore submit that an assessment of the need for new retail development in Cheltenham town centre should be carried out, and that reference should be made to this in the local plan.</p>	<p><b>Local plan objective O19, O20, O24, O25</b>  <b>Recommend</b> to inform the local plan the Council will be undertaking an assessment of retail demand in the town centre. This study will provide a health check of the town centre, considering potential retail capacity.</p>
<i>public conveniences</i>			
41		<p>More toilets in the town but closed at night to stop them being vandalised.</p>	<p>The Council recognises the need for public conveniences within the town to meet the needs of shoppers and tourists.</p> <p><b>Local plan objective O28</b>  <b>Recommend</b> the local plan will encourage the provision of new public conveniences in larger developments open to the public, and will itself seek to provide and maintain a high standard of facilities in the town centre.</p>

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51		<p>There are not enough public conveniences. Those which exist are not serviced frequently enough or well enough. When visitors find them smelly and dirty they must be given a very poor impression of Cheltenham.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	See ref. 41.
75		<p>The need to provide public conveniences is urgent. I have often been asked for directions to the nearest facility and they are amazed at the distance they have to walk, in the town centre!</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	See ref. 41.
<b>community facilities</b>			
44	Page 3	<p>As we have a festival of literature in Cheltenham, we really need a better central library - more centrally located, more pleasant to visit, more comfortable to visit. The one we have is shamefully inadequate for a town of this size with such literary and arts associations. (The present library could be turned into an art gallery?)</p>	<p>Adopted local plan identifies proposals by Gloucestershire County Council to relocate the Central Lending Library to a site off Chester Walk. Relocation would provide improved library facilities and enable the art gallery to expand. The local plan review will continue to reflect the County Council's long term needs for the site.</p> <p><b>Local plan objective O29</b> <b>Recommend no change</b></p>
283		<p><b>Cheltenham Friends of the Earth</b> Need to retain independent shops which are more responsive to local needs. Can see the desire people have from success of farmers market and this needs to be supported through local plan.</p>	Comments noted.
<b>access</b>			
26		<p><b>Simon Pontifex &amp; Associates</b> Strongly believe that it will be counter-productive to the well being of the town centre to allow taxis or buses to enter pedestrianised areas. I would like to see the pedestrianised areas extended to cover the length of the High Street from Henrietta Street to The Strand, linking in Pittville to Winchcombe Street up to Albion Street, the top end of the Promenade and Clarence Street, where these adjoin the High Street areas. In effect, one would create a safe, pleasant and attractive shopping centre environment.</p> <p>I realise the completion of the ring road through the St. James' Station site to Gloucester Road, plus the missing section of the Northern Relief Road between Monson Avenue and the Post Sorting Office must be completed before a full pedestrianisation scheme can be implemented. In addition, the traffic light intersection of Gloucester Road with the High Street and Tewkesbury Road will need major work in order to ensure good traffic flows at all times of the day.</p>	<p>The Council are currently exploring potential for further pedestrianisation of the town, together with key stakeholders, within the context of the Urban Design Framework and the town centre strategy in the Cheltenham Transport Plan.</p> <p><b>Local plan objective O24</b> <b>Recommend</b> amend local plan polices to reflect principles of the Cheltenham Transport Plan and Urban Design Framework.</p>

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57		Provision of more central pedestrianisation.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	See ref. 26.
61		The Clarion has failed to explain the key steps to encourage growth in business in the town centre, which is dependent on traffic being able to access the town centre. Residents need to get through the town, and current plans seek to make this more difficult.	The local plan recognises the importance of the town centre and the wide range of activities which are undertaken within it. Transport and accessibility are essential components in creating a thriving economy. The local plan recognises that residents and visitors to the town require access to the town centre by car, however the plan must also consider access by other transport modes including public transport, walking and cycling. These issues need to be addressed within the context of protecting and enhancing the high quality environment of the town centre. In considering the access needs of the town centre the local plan will reflect demand management measures set out in the transport plan and urban design issues set out in the urban design framework, to create a town with a 'high quality shopping and tourist centre, a town centre full of vitality, with an attractive pedestrian friendly environment and ambience'. <b>Local plan objective O19, O20, O24, O25, O36</b> <b>Recommend</b> amend local plan policies to reflect principles of the Cheltenham Transport Plan and Urban Design Framework.
82		Do NOT ban traffic from Cheltenham town centre as the centre would suffer or people would drive to out-of-town superstores. The current pedestrianisation and access for cars is the right balance so leave it as it is.	The transport strategy of the local plan recognises the need to meet the needs of the private car in providing access and facilities within the town centre. However, the needs of alternative transport modes must also be considered in promoting sustainable travel choices, including public transport, walking and cycling. The Council are currently exploring potential for further pedestrianisation of the town, together with key stakeholders. <b>Local plan objective O19, O20, O24, O25, O36</b> <b>Recommend</b> The local plan will consider the issues raised by the Urban Design Framework in the consideration of further pedestrianisation of the town.
116		Vehicles and pedestrianisation - How interesting it would be to study a time lapse sequence shot within the Lower High Street during a normal working day, watching infighting between buses, taxis, parked cars exhibiting orange badges, and pedestrians. How could one ever consider handing such an area over to pedestrianisation? Even now cyclists ignore signs to dismount along existing paved areas of the Upper High Street and Promenade.	Comments noted. Current proposals do not envisage pedestrianisation of the Lower High Street. <b>Local plan objective O19, O20, O24, O25, O36</b> <b>Recommend</b> see ref. 82.
129		<b>Gloucestershire Fire and Rescue Service</b> My observations are interlinked, and concern the central issue of access for emergency Fire Appliances and Crews. As you will be aware Fire Services are required to meet attendance times set out in guidelines published by the	Comments noted See ref. 82.

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		<p>Department of Transport Local Government and the Regions.</p> <p>It is essential to the safe environment we are seeking to create that every effort is made to ensure access is maintained at all times. Pedestrianisation of areas and traffic calming measures, can have an effect on the ability of the Fire Service to meet the times laid down.</p> <p>I would seek to see a co-ordinated approach to any such schemes so they were not designed in isolation. One scheme in itself is not a problem, a number down a primary access route to other areas of the town can hamper progress considerably.</p> <p>During development of plans, particularly regarding the town centre, I would ask that you continue to consult closely with Gloucestershire Fire and Rescue Service, so that our view is considered at the appropriate times.</p>	
181		<b>Cheltenham Chamber of Commerce</b> With regard to the town centre it is felt that the car parks and bus stops are too far from the shopping centres.	<b>Local plan objectives O8, O28, O29, O34</b> <b>Recommend</b> the Transport strategy of the plan will incorporate proposals set out in the Cheltenham Transport Plan which considers the movement of public transport and management of car parks. The plan will also have regard to the findings of the Urban Design Framework which considers access in and around the town centre for pedestrians and public transport.
188	6.9 6.10 6.11	<p><b>Cheltenham Civic Society</b> Support. Develop Royal Well as a public space.</p> <p>Support proposals to improve traffic flows around the town centre and reduce traffic flows on other routes.</p> <p>Unregulated free parking in streets around the town centre is out of control but currently inevitable. Any imposed regulation is countered by moving the problem to a still unrestricted area. Office-hours street regulations should be relaxed out-of-hours to accommodate adjacent residents but crossover times can present problems.</p>	<p>Proposals for the development of Royal Well need to be considered in the context of the long term transport strategy for the town centre</p> <p><b>Local plan objective O12, O24, O35, O36</b> <b>Recommend</b> local plan will consider town centre strategy of Cheltenham Local Transport Plan and findings of Urban Design Framework.</p> <p>The parking strategy of Cheltenham Transport Plan recognises the impact of unregulated on street car parking in residential areas close to the town centre. The provision of a greater number of short stay car parking spaces and introduction of resident's parking zones seek to combat problems currently experienced.</p>
288	6.3 6.8 6.9	<p>Shopping means cars. Not practical to expect shoppers with heavy bags to use buses.</p> <p>Maximise car parking in these development areas. Can always put housing on them when have good public transport in town rendering car parks obsolete. Go underground as well as multi-storey.</p> <p>Encouraging bikes and limiting cars excludes majority of residents from town centre. Taking away car access reduces number of people able to use town's facilities.</p>	<p>Whilst recognising the role of the private car, the local plan also recognises the importance of alternative and more socially inclusive modes of transport in providing opportunities for movement around the town. The local plan will promote and provide facilities for park and ride, better integration of transport, and opportunities for walking and cycling.</p> <p>Through the Cheltenham Transport Plan the Council is working with public transport providers through a Quality Bus Partnership to bring forward a more integrated and reliable bus network.</p> <p><b>Local plan objective O34, O35, O36</b></p>



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	6.11	Get rid of commuter parking and free up the town - Park and Ride and lots of buses!	<b>Recommend</b> the local plan will reflect the provisions of the Cheltenham Local Transport Plan, and findings of the Urban Design Framework.
229	6.10  6.11, 6.13	<b>Prestbury Parish Council</b> Strategy is flawed and counter-productive - would encourage rather than reduce traffic. Providing such a network of roads would have negative effect on large areas of town.  The two multi-storey car parks on Albion St would have to be accessed from buses only, or shut down. If shut down, will be severe shortage of short term parking which would severely affect elderly shoppers. Conflicting issues of shopping attracting visitors and car parking will need to be resolved.	Town centre objectives of the Urban Design Framework and Cheltenham Transport Plan are to create a centre which is an attractive place to live, work and visit. The Council feels that this can be achieved by reducing levels of through traffic in areas which attract a lot of people, taking into account the needs of the elderly and disabled, the requirements of public transport, cyclist and pedestrians. The Council does not propose the closure of the town's multi-storey car parks. <b>Local plan objective O8, O16, O19, O24, O26, O28, O35, O36</b> <b>Recommend</b> the local plan will reflect the provisions of the Cheltenham Local Transport Plan, and findings of the Urban Design Framework.
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Support promotion and maintenance of Town Centre but concerned that some of key development sites involve loss of car parking. Support proposals to reduce dependence on the car, but believe the loss of parking facilities would prejudice the vitality and viability of the town centre both as a shopping and tourist destination.	The local plan review will reflect the town centre strategy in the Cheltenham Transport Plan and the principles of the Urban Design Framework. This involves retaining the overall level of off-street public car parking in the town centre and using pricing mechanisms to encourage short stay and visitor parking. Long stay visitors and commuters will be encouraged to use improved public transport and park and ride services, walk and cycle. This approach of providing a more socially inclusive and sustainable access strategy to the town centre reflects guidance in PPG6 and is intended to protect the vitality of the town centre economy from the effects of unrestrained traffic growth and congestion. <b>Local plan objective O8, O16, O19, O24, O26, O28, O35, O36</b> <b>Recommend</b> amend local plan policies to reflect principles of the Cheltenham Transport Plan and Urban Design Framework.
283		<b>Cheltenham Chamber of Commerce</b> Concerned about possibility of buses being moved from town centre - believe it would damage sustainable transport opportunities.  Support continued pedestrianisation of town and would welcome proposals to make town centre more cycle friendly with additional parking spaces and controlled access through pedestrianised zones.  Would welcome measures which increased provision of evening bus services.  Concerned about apparent desire to attract the long haul shopping trip because unsustainable transport impacts. If this is the case, focus of transport must be on trains and coaches with development of services and offers to promote this. Must ensure town not oversupplied with car parks and that new retail development geared more to local	The local plan review will reflect the town centre strategy in the Cheltenham Transport Plan and the principles of the Urban Design Framework. This involves retaining the overall level of off-street public car parking in the town centre and using pricing mechanisms to encourage short stay and visitor parking. Long stay visitors and commuters will be encouraged to use improved public transport and park and ride services, walk and cycle. The provision of high quality bus services close to or through the centre of the town is a critical principle in both the Urban Design Framework and the town centre strategy of the Cheltenham Transport Plan. This approach of providing a more socially inclusive and sustainable access strategy to the town centre reflects guidance in PPG6 and is intended to protect the vitality of the town centre economy from the effects of unrestrained traffic growth and congestion. <b>Local plan objective O8, O16, O19, O24, O26, O28, O35, O36</b>

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	6.3	needs than regional.  States that town centre has suffered increased competition. This is not echoed by reports of former town centre manager whose statistics showed that Cheltenham's position had improved in recent years. Would not wish to see this as a means of justifying unsustainable car parking provision in town centre.	<b>Recommend</b> amend local plan polices to reflect principles of the Cheltenham Transport Plan and Urban Design Framework.
290	6.9	<b>Cyclists Touring Club</b> Refers to improving the environment for cyclists, in the context of creating public places in the centre. These improvements need to cater for cyclists who wish to travel across the centre. If suitable routes are not provided, more cyclists are likely to cycle through pedestrian areas.	Agree. <b>Local plan objective O8, O16, O19, O24, O26, O28, O35, O36</b> <b>Recommend</b> amend local plan polices to reflect principles of the Cheltenham Transport Plan and Urban Design Framework
294	6.11	Use of term 'free' along with extensive and unregulated suggests it is wrong or to be deprecated. What is meant is 'not charged for'.	Comment noted. Recommendation N/A
295		<b>Swindon Parish Council</b> Too much pedestrianisation or urbanisation is a bad thing. Passing traffic provides passive surveillance of streets, reducing opportunities for crime. Roads help break up open spaces available for the congregation of large gangs.  Total pedestrianisation must make people feel safe and must also enable cross- town public transport services to operate.  Commercial premises generate much traffic. Depriving companies of the basic facilities to run effectively is wrong. Relocation to trade parks on the town's perimeter has already started.  As the Tourist Information Centre is not easily accessible to disabled people it should be relocated.  The ambitious plans of the Council's Urban Design Strategy are at the expense of the rural areas.  The combination of measures in the Town Centre Strategy and the expansion of out of town retail parks would cause shopkeepers to move out of town.	See ref. 82
<b>Issue 7 Planning Obligations</b>			
288		Please remember that Local Plan currently supports fact that the Gym Club will be supported in finding alternative premises to make up for loss of building they have been renting up until recently, and desperately need a new home.	The building occupied by the Gym Club in Montpellier Gardens has now been demolished following an asbestos scare, and pending submission of a lottery bid for regeneration of the gardens. At a Cabinet meeting in November 2001 Members identified opportunity for the provision of a gymnastics centre on the recreationally designated part of the redundant allotment land at Midwinter. <b>Local plan objective O27, O29</b>

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			<b>Recommend</b> local plan will take into account deliberations regarding recreation opportunities on land at Midwinter allotments which will be considered by the Cabinet at the end of March 2002.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon welcome a clear strategy but express concern where this places onerous, unnecessary or unreasonable demand on developer. Cost of developing previously used land significantly higher than that of green field sites - onerous planning obligations impact on viability of proposals for these sites, making it unlikely that they will come to fruition within plan period.	Comments noted.
174		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Suggest that section on planning obligations ought to explicitly reflect Government policy that requirement for such obligations should be fairly and reasonably related to development proposed and should not be used to resolve existing inadequacies.	Agree.
292	7.1  7.2	<b>Gloucestershire County Council</b> This section supported in general.  First sentence should include reference to public facilities and should read as follows: "The development of land frequently gives rise to a need for the provision of new community, public facilities or other actions."  Sentence should be amended as follows (suggested wording in caps): "Planning Obligations are legal agreements, usually between the Council OR THE COUNTY COUNCIL and a developer, which enable such needs to be met. THE LEVEL AND EXTENT OF CONTRIBUTIONS WILL RELATE TO THE DEVELOPMENT PROPOSED. WHERE PRACTICABLE, the local plan will [delete 'need to'] indicate the scope of contributions which may be REQUIRED towards needs arising from developments.	Agree.
<b>Issue 8 Development Strategy</b>			
25		I moved to live and work in Cheltenham in 1954, since then much of the Green Belt has vanished and there are far fewer green areas in the town. If Cheltenham is to retain its identity, what is left must be protected. I'm glad the council recognises this.  <i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i>	Comments noted <b>Local plan objective O9, O12, O14</b> <b>Recommend N/A</b>
82		Please do NOT allow green belt to be built on, especially between Cheltenham and Gloucester. Keep the 2 places separate and retain the countryside by developing every possible brownfield site.	Government guidance and Gloucestershire County Structure Plan require the local plan to make the best use of land, particularly previously developed land (brownfield). To inform the local plan review the Council has prepared an Urban Capacity Study

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			<p>to assess the potential capacity of Cheltenham to meet its housing requirements on brownfield sites. The Urban Capacity Study sets out that Cheltenham has the potential to meet the majority of its housing requirements on brownfield sites. The Development Strategy allocates a greenfield site within the town to meet the identified shortfall.</p> <p><b>Local plan objective O7, O9, O12, O14</b>  <b>Recommend</b> the local plan will promote the re-use of previously developed land and buildings within the town. annual review of the urban capacity study will inform the council of brownfield sites which may have the potential for redevelopment.</p>
188	8.6  8.10	<p><b>Cheltenham Civic Society</b> Support sustainability criteria.</p> <p>Possible relaxation of greenbelt development restrictions acceptable. A very sensitive issue which include future of Staverton Airport, its proximity to GCHQ, its possible closure and new housing use.</p>	<p>Comments noted.</p> <p>The Council will adopt a sequential approach in the allocation of land for development. Findings of an urban capacity undertaken by the Council identify that Cheltenham's housing requirements can be accommodated within the urban boundary of the Borough. The Council are currently assessing Cheltenham's capabilities to accommodate 12ha of additional employment land up to 2011. Staverton airport lies outside the boundary of Cheltenham, and therefore cannot be considered in meeting Cheltenham's development needs.</p> <p><b>Local plan objective O5, O6, O7, O9, O13, O19, O20, O22</b>  <b>Recommend</b> the Council will take account of the findings of the Economic and Regeneration Strategy, urban capacity study</p>
189		<p><b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b> RMC welcome identification of development sites within borough. Such a strategy will allow for new housing development to be tested against sequential approach identified in PPG3.</p>	<p>Comments noted.</p>
193	8.3	<p><b>Countryside Agency</b> Welcome inclusion of a Development Strategy which integrates with other council strategies.</p>	<p>Comments noted.</p>
194	8.5, 8.6  8.9	<p><b>Mason Richards (on behalf of Bovis Homes)</b> Do not consider that statements go far enough. Should point out there is land on urban edge not in designated green belt and has previously been identified as appropriate for development. Should also be recognised that there may be instances for greenfield land to be used for housing if in sustainable location.</p> <p>In light of requirements of emerging RPG for SW in advising that Green Belt review may be necessary as part of development plan reviews, this should increase emphasis on opportunities which currently exist on non-green belt land to meet longer term development requirements.</p>	<p>RPG10 sets out the need for development plans to critically review the Green Belt and identify alterations to allow for long term development needs. However, the RPG also states that Green Belts should be reviewed in the next round of structure plans. The review of Cheltenham Borough Local Plan will be prepared within the context of the Second Review of Gloucestershire Structure Plan which maintains the Green Belt between Gloucester and Cheltenham and north of Cheltenham.</p> <p>The findings of the urban capacity study outlines that Cheltenham's housing requirement may be met within the urban boundary. Assessment of Cheltenham's employment options will determine whether any development will be required outside the urban boundary. Taking this into account, review of the Green Belt is unlikely prior 2011, providing options to be fully explored within the</p>

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			context of the Third Review of Gloucestershire Structure Plan. <b>Local plan objective O5, O6, O7, O9, O13, O14</b> <b>Recommend</b> the local plan will promote the re-use of previously developed land and buildings within the town. annual review of the urban capacity study will inform the council of brownfield sites which may have the potential for redevelopment.
222	8.10	In re-assessing the green belt the Local Plan review should consider abolishing the green belt between Cheltenham and Bishop's Cleeve in order to protect the far more important green belt on the Gloucester side.	See ref.194
228	8.5  8.20	Best use should be made of all potential infill sites, including that on edges of town, for housing development. Owners of suitable land for building in Prestbury should be able to submit plans which should be judged on their effect on area rather than on pre-determined decision not to develop. Good development should be permitted, poor development rejected. Green Belt land beyond built town environment should be protected completely.  As town grows its boundaries may have to be pushed back. If any development has to take place in green belt should be to west of town, which will fulfil need of not merging with Bishop's Cleeve or Gloucester.	Comments noted.
229	8.9, 8.10	<b>Prestbury Parish Council</b> Inclusion of these items compromises green belt by providing easy means of changing green belt boundaries. Should be deleted.	Local plan will reflect national, regional and county planning guidance. The local plan is required to identify how development will be accommodated up to 2011. The Council will determine whether Cheltenham's development needs may be accommodated within the urban area. <b>Local plan objective O5, O6, O7, O9,, O13, O14, O19, O22, O32</b> <b>Recommend</b> no change.
240	8.8	<b>Cheltenham Conservation Area Advisory Panel</b> Whole matter of green belt fraught with irreconcilable objectives, but ultimately it is welfare of inhabitants of town which should be major concern. Small amount of consolidation may now be necessary. Perhaps town is now too big for the kind of environment Latham is aiming for. Could well be more logical to start entirely new communities with their own internal facilities - shopping, workplace, churches, schools etc to scale which is more appropriate to convenient living. Creation of satellite communities may be only way that Cheltenham will continue to be a pleasant place to live.	See ref. 229.
241		<b>Foxley Tagg Planning (on behalf of Wilcon Homes)</b> Wilcon welcome identification of development sites within borough. Review of green belt boundary would also be welcomed should it prove necessary.	Comments noted.
272	8.2	Suggest that term 'strategic approach' be	Objective of the development strategy is to outline

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		<p>replaced by 'detailed approach'. It seems to me that the new approach is actually less strategic but more tactical.</p> <p>Cheltenham/Gloucester Green Belt in urgent need of readjustment, although realise this should be addressed by current revision of County Structure Plan.</p>	<p>the broad proposals for land use, development and management of the built and natural environment, providing a strategic approach to development.</p> <p>Comments in regard to Green Belt noted. <b>Recommend</b> no change</p>
274	8.10	<p><b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Welcome recognition that development may necessitate review of Green Belt, but would suggest that reference to peripheral on parais inappropriate and should be replaced by reference to development on edge of urban area.</p>	Agree.
278	8.10	<p>Clause is vague and unacceptable. Any clauses that appear in the structure plan should be specific and should minimise any development within greenbelt and seek to limit the effect of any such development on the community into which it is placed or that it bounds. As the phraseology is written, any new development could swallow an existing community.</p>	Comments noted.
281	8.9	<p><b>Up Hatherley Parish Council</b> Welcome continued commitment to Cheltenham/Gloucester greenbelt. In answer to RPG regarding need to review greenbelt zones in development plans, may be appropriate for borough council to establish priority areas of greenbelt on outskirts of town. Up Hatherley greenbelt, for example, clearly much more sensitive than that which lies to north west and also has high grade scenic quality, unlike much of land that lies to north west of town.</p>	See ref. 194.
283		<p><b>Cheltenham Friends of the Earth</b> Object to major development in areas currently designated greenbelt. However, if there are proposals to de-designate any areas request to be consulted on this.</p>	Comments noted.
285	8.6	<p><b>PARC</b> Add sentence saying again that conservation areas and listed buildings are to be protected.</p>	Protection of built environment is highlighted in Issue 4. Paragraph 8.6 broadly sets out key objectives to the location of development, principally, addressing the need to travel.
286		<p><b>Robert Hitchins Ltd.</b> Support intention to examine green belt should Cheltenham's development requirements, as set out in Structure Plan, not be satisfactorily accommodated within urban area. In this context an area to north and west of Swindon Village could be removed from green belt without compromising green belt objectives. Notwithstanding this it is considered that the opportunity should be taken in the second review of the local plan to re-examine inner boundary of green belt around Swindon Village. In this context Plan 1 (attached with response) shows an already developed parcel of land of insignificant size which should be</p>	See ref. 194.

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		<p>excluded from green belt.</p> <p>Given clear intention to look at green belt, should there be a need for additional greenfield releases plan should also consider future status of white land at Leckhampton.</p>	
287	8.10	<p><b>CPRE</b> This statement would seem to be superfluous since housing requirements can be met without using green belt, or is it an "enabling" statement to cover possible delay with GCHQ scheme, or pressure to find more land for employment, reflecting fears we have expressed in relation to paras 3.5 to 3.9? [CPRE position statement on Gloucestershire green belt attached with comment for information].</p>	See ref. 194
294	8.10	<p>Emphasis on protecting green belt falls down in face of this statement.</p>	Comments noted
295	8.9  8.10	<p><b>Swindon Parish Council</b> Appears to outline proposal for large scale incursion into greenbelt. States RPG for south west, which recognises importance of greenbelt but believes it should still be developed to provide long term sustainable development. This is a means of saying that development should be urban in style and density, and not rural.</p> <p>Emphasis on protecting greenbelt and only permitting development in exceptional circumstances falls down in face of this statement.</p> <p>Above paras are vague and unacceptable. Any clauses that appear in structure plan should be specific and should minimise any development within greenbelt and seek to limit effect of any such development on community into which it is placed. As the phraseology is written any new development could swallow an existing community.</p>	See ref. 194
303	8.7	<p>Yet to see any associated community services planned on any of the many huge new developments in the past 30 years. Huge collections of houses with no community centres or open spaces. Lack of halls or meeting areas growing concern.</p>	Comments noted.
305	8.10	<p>Need to flag up intention of accepting the PUA's inevitable long term expansion to north west and hasten this as much as possible rather than mess up Conservation Area or Leckhampton white land.</p>	See ref. 194.
<b>Issue 9 Cross Boundary Considerations</b>			
108		<p>Protecting our countryside, 'the air that we breathe' - this is, of course, a particularly emotive issue in Leckhampton, with Tewkesbury threatening to build 400 houses on green belt land in this AONB (I can not understand why Tewkesbury controls land to the south of Cheltenham, nor that my MP represents Tewkesbury). This scheme will</p>	Comments noted.

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		<p>have an adverse impact on 'the air that we breathe'. These houses will be far away from local facilities, an increase in car usage in inevitable.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	
181		<p><b>Cheltenham Chamber of Commerce</b> Boundary restrictions push developments into surrounding boroughs to the detriment of Cheltenham.</p>	<p>The boundary of Cheltenham is tightly drawn around the urban area. The review of the local plan will need to address the implications this has in meeting the development needs of the town over the plan period. Preparation of an urban capacity study identified that Cheltenham's housing requirements can be met within the urban area over the plan period. The Council is currently assessing whether sites are available to meet employment needs of the town over the plan period.</p> <p><b>Local plan objective O5, O6, O7, O9, O13, O19, O20, O21, O22</b></p> <p><b>Recommend</b> annual review of urban capacity study, consider findings of report on assessment of employment sites.</p>
182	3.5	<p><b>Cheltenham Cycle Campaign</b> Ought the plan, and plans of neighbouring authorities, express cooperations rather than just compliance with national or county objectives? ie prevent developers playing off one authority against another in order to obtain permission of a counter strategic development?</p>	<p>In formulating policies and proposals planning authorities are required to have regard to regional and strategic planning guidance, and national policies set out in planning policy guidance notes. National, regional and county objectives set out a framework within which district authorities prepare local plans. The review of Cheltenham Borough local plan will be set within the context of Regional Planning Guidance for the South West (RPG10) and Gloucestershire Structure Plan Second Review. Cheltenham Borough Council and neighbouring local authorities were involved in the strategy and objectives of this guidance through extensive consultation, which included the consideration of objections at a public examination.</p> <p>Where development proposals affect adjoining districts the Council will seek to work co-operatively.</p>
188	9.3	<p><b>Cheltenham Civic Society</b> Absolutely vital that Gloucester, Tewkesbury and Cheltenham Councils work closely and constructively together. Failure to do so will inevitably create major problems for the future. A very high priority area.</p>	<p>Comments noted.</p>
193		<p><b>Countryside Agency</b> Pleased to note council's commitment to working with neighbouring authorities in delivering its own and the County's development plans.</p>	<p>Comments noted.</p>
201		<p><b>Tewkesbury Borough Council</b> This statement is welcomed. Issues such as future development options, the future of White Land/Green Belt, Park &amp; Ride and the North West Distributor Road will require close inter-local authority working in the future, not just between Cheltenham and Tewkesbury but also involving Gloucestershire County and</p>	<p>Comments noted.</p>



Ref. No.	Para/ Section	Summary of Response	Project Nexus Recommendation
		Gloucester City.	
228	9.3	Support close liaison and cooperation.	Comments noted.
241		Wilcon welcomes working together of local authorities. Will enable users of planning system to liaise with local authorities with confidence in knowledge that dialogue exists between them.	Comments noted.
272		Essential that Cheltenham Plan meshes properly with adjoining councils, especially Tewkesbury, as their borough contains virtually all the potential area for Cheltenham to expand into. This is particularly true in Leckhampton. At present draft TBC local plan proposes 400 houses on edge of Cheltenham, adjacent to Farm Lane and Leckhampton Lane. Tewkesbury appear to want to develop this site at same time as Cheltenham develops the 'white land' on the other side of Farm Lane. It is therefore much to be applauded that Cheltenham does not contemplate developing this land at all.	Comments noted.
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Recognise important of cross-boundary cooperation, but believe Issues Paper should also recognise that Local Plan will need to make provision for Cheltenham's needs within its own boundaries and an exportation of needs, be it development or other facilities, will normally not be appropriate.	Comments noted.
278		To have developed all land available and then to seek to build on all greenbelt land and green fields to infill between existing buildings and borough boundary is unacceptable. Also unacceptable to seek to claim undeveloped land of adjoining authorities should act as borough's greenbelt, but also that this borough has to consider provision of its affordable housing and its much promoted park and ride sites within land of those adjoining borough. - just how much green belt are you seeking to build on?	See ref. 194.
286		<b>Robert Hitchins Ltd.</b> Meeting structure plan employment requirements may also require cross boundary planning (see employment comments).	Comments noted.
287	9.2	<b>CPRE</b> Peripheral development outside borough boundary Presumably this refers to proposals by Tewkesbury Borough Council for residential development at Leckhampton and Prestbury. CPRE endorses objections CBC has made to these proposals and intends to speak accordingly at forthcoming public inquiry. With regard to Prestbury proposal and flooding implications, encouraged to see reference in para 1.6 of issues paper to a commitment in favour of ground drainage rather than pipe dispersal. Welcome council's stance on this issue.	Comments noted.

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295/304		<p><b>Swindon Parish Council</b> Unacceptable to seek to build on greenbelt and greenfield to infill between existing buildings and borough boundary. Unacceptable to claim that undeveloped land of adjoining boroughs should act as green belt. Unacceptable to consider provision of council's affordable housing and park and ride sites within land of adjoining boroughs.</p>	See ref. 194
299		<p><b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Appropriate that cross boundary issues are acknowledged. Council must be realistic about what can be achieved, bearing in mind the Tewkesbury Borough Local Plan is much further ahead.</p>	Comments noted.

## DRAFT DEVELOPMENT STRATEGY

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
<i>general</i>			
285	1.19, 1.20, 3.6  2.7	<b>PARC:</b> PPGs are "material considerations" as are Design and Development Briefs. Strongly believe that D&DBs, eg the Park D&DB, being local and specific, should have a greater weighting and should prevail over national PPGs where there is any conflict.  Please add "The Park" after "Montpellier".	Development briefs have been prepared within scope of national planning guidance. Therefore no conflict should arise.  Agree.
286	1.5	<b>Robert Hitchens Ltd.</b> Structure plan was "adopted" by the County Council.	Agree.
292		<b>Gloucestershire County Council</b> General comments from Fire Service: 1. Names of new roads to be chosen with car to reduce/avoid confusion. 2. Water supplies and access for emergency vehicles for firefighting must be within current guidelines/legislation. It has become increasingly difficult for fire appliances to negotiate streets full of parked cars. 3. Traffic calming measures installed should be sympathetic to requirements of fire appliances responding to incidents. 4. Not included in plan are proposed changes to traffic routes within town. Will have major implications for fire crews responding to emergency calls and should be discussed at County level.	Review of local plan, and implementation of Cheltenham Transport Plan will consider needs of Gloucestershire Fire Service. The fire service will be consulted at the key stages of the review process.
294	1.17  1.18  1.19	Pleased to see outlying areas included in this review. This was noticeably lacking in transport plan.  Hopefully this includes green belt, but it conflicts with concept of 'North Western Distributor Road'.  Plans proposed in transport plan contrary to this policy.	Comments noted.  Intention of Green Belt is to prevent urban sprawl. Proposed NWDR is not associated with development. Therefore with careful design and landscape a road could potentially be accommodated which continue to preserve the openness and visual amenity of the Green Belt. <b>Local plan objective O3, O9, O12, O13, O14, O18, O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.
295/ 304	1.17  1.18  1.19	<b>Swindon Parish Council</b> pleased to see outlying areas included in this draft - noticeably lacking in transport plan. Hopefully includes greenbelt, but conflicts with concept of NWDR.  Plans are being proposed, as concepts, in adopted transport plan, which are contrary.	See ref. 294.
299	  2.16	<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> As this document will form a chapter in First Deposit important that it is fully up to date.  Insufficient information available to say what	Agree.  A range of information is available to identify



Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
			<b>O14, O18, O32, O36</b> <b>Recommend</b> amend built environment policies to reflect PPG3. consider the findings of reports which will consider transport case and planning considerations of NWDR concept. consider findings
283	3.46	<b>Cheltenham Friends of the Earth</b> Support version of Government's sustainable development strategy in para 3.5 of DDS and would like to see this wording and order in Key Issues paper para 1.3.  Local plan could be strengthened to provide more positive policies for delivery of objectives in BAP and for how Cheltenham's open spaces can contribute to this.	Agree.  Agree. <b>Local plan objective O6, O18</b> Recommend review local plan within scope of Gloucestershire BAP. Review council's approach to strategic green network.
285	3.5  3.15  3.22  3.23	<b>PARC:</b> Second bullet point should be expanded to clarify that environment includes the townscape, greenspace and streetscape as well as flora and fauna.  Strongly believe that whilst it may be sensible to have higher densities and lower parking ratios in town centre where all facilities are available on foot, that does not apply to locations further out where car use is essential.  Please add ".especially conservation areas, listed buildings and green space, public and private.  Please add " whilst enhancing or at least preserving the essential character of the area."	Criteria is embodied within statement.  Agree. The Council will consider lower car parking requirements where good access to alternative modes of transport may be provided.  Agree. This should be explicit.  Agree. Add...protecting and enhancing the character of the area.
286	3.25 - 3.32	<b>Robert Hitchins Ltd.</b> Is local plan being prepared in accordance with RPG to 2011 or RPG to 2016?	Local plan being prepared in accordance with RPG, adopted in 2001, looking towards 2016.
290	3.20	<b>Cyclists Touring Club</b> The point made about government guidance on pedestrians having priority in the town centre could conflict with other parts of the plan if looked at in isolation. In practice, pedestrian and cycle facilities can exist together.	Agree.
292	3.29-3.32:  3.39  3.50  3.59	<b>Gloucestershire County Council</b> will need updating to reflect publication of new RPG.  Should refer to definition in structure plan second review of CSV in para 6.5.4.  Relationship between Community Strategy and Local Plan should be set out here.  If borough considering sites for employment use some of land at GCHQ Benhall would be suitable location. County Council objects to the lack of identification of suitable employment sites (para 4.18 Draft	Agree.  Agree.  Agree.  Land at GCHQ no longer available for employment use in response to need for additional car parking to service the requirements of consolidated GCHQ site. <b>Local plan objective O19, O20, O21</b>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		Development Strategy). This is considered to be a significant issue given the Structure Plan Strategy for Cheltenham.	<b>Recommend</b> consider findings of assessment of employment sites.
	3.60	Date of publication should be included.	Agree.
	3.41	Should be amended to the following: "In July 2000 Gloucestershire County council submitted its first Local Transport Plan to the government. This has replaced the Transport Policies and Programme and is now the statutory document for transport strategy and the bidding document for transport funding for the County."	Agree.
	3.70	This should be deleted. Areas where Cheltenham Transport Plan does not correspond to Glos LTP and elements of Transport Plan to which County Council as Highway Authority have objected.	No change.
	2.10, 2.11	County Council currently seeking to replace inadequate central library in Cheltenham. Discussions have taken place with officers in borough, so surprising that there is no reference to this in strategy. Paragraphs refer to facilities which Cheltenham offers, eg museums, swimming pools. Should be reference included here to central library and four branch libraries.	Adopted local plan makes provision for future development needs of central library. This will be reflected in review of plan, and referenced as a community facility where appropriate
294	3.10	No guidance regarding specific uses that are 'not appropriate'. Who decides?	PPG2 sets out inappropriate development, this is reflected in policies CO49- CO51 in adopted local plan.
	3.11	Contradicts adopted transport plan which proposes new road through green belt. No indication of what would be considered 'exceptional circumstances'.	PPG2 sets out that in identifying land for development local authorities must consider opportunities within the urban area. 'Exceptionally' refers to where such development cannot be accommodated and local authorities consider sustainable use of land in the Green Belt.
	3.15	In many areas lower parking standards already poor and creating difficulty and danger to drivers and other road users. Any further reduction will lower standard of living even more.	Lower car parking standards will be considered where development is accessible to alternative modes of transport, close to a range of service, facilities and employment.
	3.23	Who determines what constitutes good design?	The Council has appointed an urban design consultant to prepare a framework of the town, including identification of townscape quality, and identifying principles to be considered when assessing planning applications. Planning applications are made available for public comment, enabling individuals to comment on design. The Council also consults with the Commission for Architecture and the Built Environment (CABE), Cheltenham Civic Society, and Architects Panel.
	3.32	'New resources for public transport' - commercially inoperable until service adequate for all needs and major changes made in personal attitudes as a result of an adequate service. 'Green belt policy' - what guidelines control the review?	The Council is working with bus operators in a quality bus partnership to improve provision of
	3.34	Outlying areas denied access to all facilities due to inadequate public transport and pressures to reduce or remove personal	

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	3.40	transport in form of car. So how are these facilities going to be made available to all? Very narrow corridor of green belt in some places. What areas are there on edge of Cheltenham where building is possible without contradicting table 1 col 1 para 4?	public transport within the town, through improved facilities and information and improving reliability of buses.  Two sites on the boundary of Cheltenham have been allocated in Tewkesbury Borough Local Plan. Land is allocated at Noverton for 90 dwellings and land at Farm Lane for 400 dwellings.
	3.42	North west distributor road contrary to policy of maintaining green belt. Constitutes inappropriate development and aims of preventing coalescence and urban sprawl (para 4.49).	Intention of Green Belt is to prevent urban sprawl. Proposed NWDR is not associated with development. Therefore with careful design and landscape a road could potentially be accommodated which continues to preserve the openness and visual amenity of the Green Belt.
	3.49	Who defines what constitutes a valuable open space to be protected?	The Council will consider comments from local communities in assessing open spaces to be protected.
	3.59	Cannot promote Cheltenham as centre of excellence when difficult for business visitors to travel around town and easy and short term access denied.Lack of ready parking is driving visitors away.  Why is lack of greenfield sites considered a weakness? Why do we want more industrial sites? Accept there is little for outward expansion within borough and therefore there can be no new industrial development.	The local plan retains the overall number of parking spaces in the town with a greater number of spaces allocated on a short stay basis rather than for long stay, thereby meeting the needs of visitors and shoppers. The plan supports the use of park and ride services which meets the needs of long stay visitors.  In retaining Cheltenham's strong economic position and create a diversified and sustainable economy the Council must assess the need for employment land within the town to provide modern, adaptable and accessible business space. Protection of existing employment sites and allocating of additional land will allow existing businesses to expand and encourage new businesses to establish a position within Cheltenham. Allocation of sustainable employment land may require allocation of a greenfield site, due to the limitations of brownfield sites within the urban area. <b>Local plan objective O2, O3, O5, O6, O7, O9, O11, O12, O13, O14, O16, O18, O19, O20, O21, O23, O24, O32, O35, O36</b> <b>Recommend</b> consider the findings of reports which will assess transport case and planning considerations of NWDR concept. Consider findings of urban design framework and objectives of Cheltenham Transport Plan in improving movement and access of vehicles in and around the town centre. Consider economic development and regeneration strategy and assessment of potential employment sites. Consider findings of Urban Design Framework.
295/304	3.10	<b>Swindon Parish Council</b> Who decides what is and what is not 'not appropriate'?	See ref. 294.
	3.11	Contradicts adopted transport plan wherein new road proposed through green belt.	See ref. 294.
	3.15	Any further reduction to car parking standards will lower standard of living in	See ref. 294.

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	<p>3.23</p> <p>3.32</p> <p>3.33</p> <p>3.34</p> <p>3.40</p> <p>3.42</p> <p>3.49</p> <p>3.59</p>	<p>areas where parking already poor and creating difficulty.</p> <p>Who determines what constitutes good design?</p> <p>Re new resources for public transportation - commercially inoperable in Swindon until service adequate for all needs and personal attitudes changed as result of an adequate service.</p> <p>What guidelines control the review of green belt policy?</p> <p>How are facilities going to be available to all when outlying areas denied access due to inadequate public transport and pressure to reduce/remove use of car.</p> <p>Greenbelt very narrow in some places and non-existent in others - what areas are there on edge of Cheltenham where building is possible without contradicting table 1 col 1 para 4?</p> <p>NWDR contrary to policy of maintaining greenbelt and expressed wishes of people and County Council. Constitutes inappropriate development and contrary to aims of preventing coalescence and urban sprawl as contained in para 3.49.</p> <p>Who defines what constitutes valuable open space to be protected? How can you promote town as centre of excellence when difficult for visitors to travel around town.</p> <p>Lack of ready parking for visitors, commercial travellers and deliveries driving people away. Why is lack of greenfield sites considered a weakness? Accept there is little room for outward expansion and therefore there can be no new industrial development.</p>	<p>See ref. 294.</p> <p>See ref. 294.</p> <p>RPG 10 sets out that Green Belt boundaries should be reviewed to ensure that future patterns of development are more sustainable. In Gloucestershire the third review of the Structure Plan will assess the need for review.</p> <p>See ref. 294.</p> <p>See ref. 294.</p> <p>See ref. 294.</p> <p>See ref. 294.</p> <p>See ref. 294.</p> <p>See ref. 294.</p>
299	3.28	<p><b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Needs to be acknowledged that RPG10 to 2016 has been adopted.</p> <p>Issue of a greenbelt review deserves much more detailed treatment - how any review is to be carried out and by what means any changes to greenbelt boundaries will be implemented. More generally, the new RPG as a whole needs more detailed treatment here as it is far more prescriptive than old RPG.</p>	<p>Agree.</p> <p>RPG10 sets out the need for development plans to critically review the Green Belt and identify alterations to allow for long term development needs. However, the RPG also states that Green Belts should be reviewed in the next round of structure plans. The review of Cheltenham Borough Local Plan will be prepared within the context of the Second Review of Gloucestershire</p>



Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	<p>3.43</p> <p>3.59</p>	<p>Puzzled by figures here for Central Severn Vale. Difficult to see how figures have been compiled and further information needs to be provided on this point.</p> <p>Redrow notes and endorses conclusions of consultants.</p>	<p>Structure Plan which maintains the Green Belt between Gloucester and Cheltenham and north of Cheltenham.</p> <p>The findings of the urban capacity study outlines that Cheltenham's housing requirement may be met within the urban boundary. Assessment of Cheltenham's employment options will determine whether any development will be required outside the urban boundary. Taking this into account, review of the Green Belt is unlikely prior 2011, providing options to be fully explored within the context of the Third Review of Gloucestershire Structure Plan.</p> <p>This information is taken from page 7 of the Gloucestershire Local transport Plan.  <b>Local plan objective O5, O6, O7, O9, O13, O14 Recommend</b> the local plan will promote the re-use of previously developed land and buildings within the town. annual review of the urban capacity study will inform the council of brownfield sites which may have the potential for redevelopment.</p>
<i>strategy - scope, themes, vision, objectives</i>			
96		<p>The town has to decide whether it is looking for growth or decline, as staying the same is usually an impossible state to achieve. I favour looking for measured growth. Achieving growth whilst maintaining the essential character of the town will require the council to make some difficult decisions. The maintenance and enhancement of suitable employment, housing and amenity for a growing number of households will require the sacrifice of some Green Belt land and a few inspirational planning decisions to encourage suitable landmark developments within the town space.</p> <p>Development in the town centre should be in harmony with the existing Regency and Victorian buildings. Such new development need not be pastiche, but should compliment existing architectural surroundings. The Beaufort apartment block opposite the Boys College is a poor example of sympathetic architecture. Conversely, modern, bold architecture has its place within the newer outskirts of Cheltenham. So far the shape and style of GCHQ looks encouraging.</p> <p>Clarion article's point regarding a 'must see' attraction emphasises the need for further landmark developments to foster the tourist, leisure and commercial attraction of the town. Given that Cheltenham has a greater number of hotels, restaurants, and nightlife attractions than a typical size town, then the potential exists to develop a high quality mid sized convention/exhibition/hotel complex. Plenty</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>A strategic theme of the local plan is one of sustainable development. Sustainability has many implications which includes the provision of services and facilities to meet the needs of residents and visitors to the town.  <b>Local plan objective O26, O27, O28, O29 Recommend</b> the Council will consider how policies of the local plan can assist in meeting the needs of all members of the community and visitors to the</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		of smaller conference, exhibition or entertainment events would be attracted to a high quality venue, complimented by the existing character and facilities of the town. Portland Street and Black and White bus station car park sites would appear to be prime locations to attract such a development. Both sites are unattractive in their present state. Open public spaces with underground car parking could be included in such a development.	town.
127	4.11-4.13	<b>Leckhampton Parish Council Meeting</b> development needs - We are pleased to note that such a high proportion of the required number of sites can be met through the use of brownfield land, noting that a site in Prestbury can be used to make up the small shortfall.	Comments noted
182	Table 2	<b>Cheltenham Cycle Campaign Local Plan</b> Objectives Q36: continue to doubt feasibility of having objectives to reduce congestion along with objectives to shift travel to modes other than private car. Reduced congestion will encourage continued use, or a regression to previous usage patterns, until people's congestion tolerance level is reached. Alternative modes have to be patently more attractive, or current misperceptions overcome, or a congestion charging structure imposed. Otherwise simultaneous objectives of reducing congestion AND modal shift would have to be met by reallocating road space so that reduced level of car use occurs in smaller space, resulting in localised congestion levels at least as dense as those currently experienced. But with few motorists, overall congestion experienced by all travellers regardless of mode would decrease substantially.	<p>It is accepted that congestion has a role in limiting traffic growth, through the difficulties associated with manouvering around the town. However if left unmanaged it can be harmful, leading to additional costs to the economy; increased vehicle emissions; difficulties running reliable public transport services; and additional dangers to other road users.</p> <p>The shift in travel to modes other than the private car must focus on those which are attractive to use. Transport schemes must be considered in the context of the built environment of Cheltenham which imposes constraints on sustainable travel modes, particularly where these would require the provision of additional highway capacity. The Council will therefore consider management measures which involve an element of reallocation of highway space to more sustainable transport modes. Such schemes may create or perpetuate localised congestion it should contribute to lower levels of car use and greater use of more accessible, sustainable, travel modes. These should result in a long term net environmental improvement over a wider area.</p> <p>Localised congestion charging has been ruled out for the time being by the council. However other measures to minimise congestion can benefit a range of highway users. Such measures include better management of highway works and greater use of urban traffic management control systems.</p>
189	4.14	<p><b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b> RMC welcomes this document as development can proceed with certainty when sites clearly allocated through local plan process.</p> <p>Particularly welcome proposal to monitor housing land supply annually in order to ensure conformity with County Structure Plan. Any indication of a shortfall in housing</p>	Comments noted.

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		land supply will require local planning authority to release further greenfield sites in order to meet housing targets.	
192	4.15	<b>House Builders Federation</b> Question basis for identification of 15 dwelling target for provision of affordable housing. Insufficient housing needs data available to justify application of such a target.	The requirement to provide a proportion of affordable housing on sites over 15 dwellings reflects the findings of a housing needs survey prepared on behalf of the Council by Fordham Research. This survey sets out that the need for affordable housing is not being met in Cheltenham. <b>Local plan objective O5, O22</b> <b>Recommend</b> the review of the local plan takes into account PPG3 which requires local plans to reflect particular needs and circumstances. The local plan will consider how this lower threshold can be addressed through the planning process.
201		<b>Tewkesbury Borough Council</b> The late identification of brownfield sites within Cheltenham meant that Tewkesbury Borough is faced with the need to provide land to meet strategic allocations on greenfield sites. The Local Plan will need to take account of the implications of development options on the edge of Cheltenham proposed in the Tewkesbury Borough Local Plan to 2011, and which might not otherwise have been required.	Taking into account the findings of the urban capacity study, it is unlikely that unallocated land at Leckhampton will come forward through the plan period. <b>Local plan objective O29</b> <b>Recommend</b> the local plan will need to consider the impact of future development proposed by Tewkesbury Borough Council on the edge of Cheltenham. Such development will have implications on the town in regard to access and generation of traffic, and pressure placed on services and facilities currently available within Cheltenham which would be used to serve new development.
214	pg. 13 (vision)  pg. 14 (objs)	<b>Railtrack</b> Support general provisions and, in particular, role buses will play supporting activities and quality of life within the town through improved frequency, reliability and affordability and better links with trains. Would appear that this desire for greater integration has failed to be promoted comprehensively through the various documents and in particular the development strategy itself.  Railtrack supports transport objectives indicated and in particular the safeguarding of potential for the future provision of transport infrastructure and the promotion of sustainable transport choices.	Comments noted.
239	Table 1 2  4.26	Implies by omission that only most architecturally and historically important buildings will be maintained. This needs adjustment.  Re latter part of paragraph referring to good design in Regency conservation areas. Vital importance of maintaining rules such as this in new Plan brought into sharp focus during recent planning hearing regarding a proposed development in the Park, a conservation area, when both form and design were much criticised and application turned down.	Comments noted. <b>Local plan objective O11</b> <b>Recommend</b> recognise the value buildings included on the local list of Cheltenham have upon the quality of the built environment. Protect these buildings from inappropriate development. Amend local plan design and built environment policies to take into account findings of Urban Design Framework.
272		Welcome the 'long term vision' of	Comments noted.

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		Cheltenham and in particular emphasis placed on its attractive location at the foot of the Cotswold escarpment. This clearly implies recognition that approach to the escarpment from Cheltenham should remain attractive.	
274		<p><b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> In referring to sustainable development believe that development strategy should acknowledge sequential approach identified in PPG3 Housing and in particular the principle that in some circumstances, where site perform poorly in relation to criteria identified in para 31 of PPG3 green field sites may need to be released to meet development needs.</p> <p>Lack of recognition that development needs of Borough may necessitate a Green Belt boundary review - inconsistent with recognition in Key Issues paper. Similarly, need to protect open land within the town should be recognised as an influence upon the strategy to provide for housing and employment needs.</p> <p>Need to link public transport facilities and opportunities to housing and employment development to create a sustainable pattern of land uses should also be recognised. This point is recognised in the transportation paras relating to influences on strategy but importance of linkage between transportation and other land uses could be more clearly expressed. Do not feel development strategy places sufficient weight on these factors.</p> <p>Under sub-heading of Sustainable Development, no explicit reference to Plan's contribution to sustainable development by ensuring that opportunities to promote and utilise new and existing forms of public transport. Believe a statement to this effect should be contained in para 4.06. Also believe a stronger statement to this effect should be contained in Table 2 of Local Plan Objectives in relation to economy, housing and transport.</p>	<p>Agree.</p> <p>See ref. 299.</p> <p>Agree, influences on strategy and linkages between land uses need to be explicit.</p> <p>Agree. Expand fourth bullet point to reflect this.</p>
280	4.12	<p><b>Town Planning Consultancy (on behalf of Chartwell Ltd.)</b> Consistent with our comments on the Urban Capacity Study, the dwelling total should be reduced accordingly. Similarly, consistent with our comments on Appraisal of Existing Policies, we consider that Table 2 on Local Plan Objectives should include a further Retailing objective to the effect that:</p> <p>"to maintain an efficient, competitive and innovative retail sector and to ensure the</p>	Comments noted.

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		availability of a wide range of shops to which people have easy access by a choice of means of transport."	
283	4.06	<b>Cheltenham Friends of the Earth</b> Object to wording of 4th bullet point. LP should be aiming to reduce need for people to travel and to reduce impact of that travel on the environment. This amendment would more comprehensively address aims of transport strategy/	Agree. See ref. 274
285	4.29	<b>PARC:</b> Believe that this is a dangerously simplistic statement. Green space, about which so much positive is said in second review of plan, is necessarily vacant and underused and it can be unsightly. That is no reason for building on it, particularly when local plan policies are there to protect listed buildings and conservation areas.	Paragraph 4.29 reflects provisions in PPG3 which requires local authorities to make the best use of land. In accommodating Cheltenham's development needs over the plan period, the local plan must consider development of sites which meet sustainability criteria, and assist in securing high quality development which would meet the long term interests of the town. <b>Local plan objective O2, O3, O5, O6, O11, O23 Recommend</b> consider findings of urban design framework. Annual review of urban capacity study.
286	4.12  Obj 22  4.15	<b>Robert Hitchins Ltd.</b> To achieve envisaged strategy essential that Urban Capacity Study is robust and able to withstand detailed scrutiny.  Should be modified to better reflect national guidance as expressed in PPG3 and restated in para 3.12 of Draft Development Strategy. Suggest that objective be re-phrased to read "to ensure that everyone has the opportunity of a decent home".  Important that exceptional local circumstances are demonstrated and justified through local plan process before a lower threshold is adopted.	Agree.  Agree. Expand objective to reflect affordability and mixed communities.  Lower threshold has been demonstrated through housing needs survey. <b>Local plan objective O7, O22 Recommend</b> reflect findings of housing needs survey. Review urban capacity study, to be placed on deposit with local plan Summer 2002.
289		<b>Cotswold District Council</b> It is clear that a considerable effort has been made to link the strategy in with other strategies, eg cultural strategy etc and other corporate objectives, very much in the spirit of joined up thinking. This approach is commendable and helps the emerging plan become an enabler of these other strategies.  The biggest concern is that the spatial dimension of the strategy is rather weak. Much is made of the vision for Cheltenham yet the development proposals are rather scattered around the borough, there seems to be a lack of vision as to where the main focus of growth (housing and employment) should be located.  Incorporated into the proposals could be a "vision statement" of where growth is to be directed during the lifetime of the plan, and	Comments noted.

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		<p>perhaps an indication of possible growth directions outside the life span of the plan. Clearly, this would be difficult to do with brownfield sites but could be applied in relation to the greenfield site at New Barn Lane/Prestbury Road (PR1).</p> <p>In terms of the release of greenfield land, the strategy makes no mention as to why the above site was chosen ahead of other greenfield sites. A short description of the site would add some transparency to the decision to include the site.</p>	
290	4.13.	<p><b>Cyclist Touring Club</b> We look forward to further detailed consultation in due course on the nature of the new road link between Prestbury Road and New Barn Lane .</p>	Comments noted.
291	4.10 - 4.14	<p><b>Leckhampton Green Land Action Group</b> Strongly welcome extent to which it is proposed to meet housing requirements on brownfield sites.</p>	Comments noted.
292	4.11  Table 1 and Table 2	<p><b>Gloucestershire County Council</b> Inclusion of expired planning permissions is not acceptable. DTLR have advised that there is no basis for this.</p> <p>Local plan objectives are supported but should include objectives to secure proper planning obligations. These may be included within objectives O5, O22, O27, O29, O33, 35, 36, to ensure infrastructure requirements arising from development are secured.</p> <p>Importance of historic environment is set out in 3.21/3.22 of draft strategy. Needs to be carried through into Table 2 Local Plan Objectives and it is recommended that following objective is included: "To protect the historic environment of Cheltenham (including its archaeological sites, historic buildings and structures), and to maintain the historic character of its townscape and the adjacent rural landscape."</p> <p>No mention of archaeology in Conservation 4.21-4.28. This section covers protected natural environment sites but not the equivalent in the historic environment. Recommend that a paragraph covering archaeology in borough added, together with commitment to protection of this resource such as: "The council will seek to protect nationally important archaeological sites and their settings including those which are scheduled ancient monuments, and other sites of more local archaeological interest, especially through ensuring that the archaeological impact of proposed</p>	<p>In realistically assessing housing requirements over the plan period the Council consider that recognition that dwellings may not come forward due to expiries of planning consent assists in bring forward a robust assessment of urban capacity.</p> <p>Facilities to support sustainable communities is embodied within objectives. Disagree that planning obligations need to be highlighted in the Council's aims and objectives. The local plan will include a policy and SPG, setting out the Council's objectives in securing planning obligations from development proposals.</p> <p>This is included in objectives O9, O10, O11, O12, and O13.</p> <p>Agree.</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		development is assessed at an early stage."	
294	Table 1	What open countryside is being referred to and how will it be possible to safeguard it? If there is no space available without removing green break then do not permit proposed expansion.	Paragraph refers to wider countryside surrounding Cheltenham including Area of Outstanding Natural Beauty and Green Belt.
	Table 1	Very narrow corridor of green belt in some places and none at all in others. Dinstinction should be that Cheltenham remains separate from adjacent land over which borough has no control.	Cheltenham Borough Council cannot determine where Tewkesbury Borough Council allocate land within their local plan. Sites allocated at Noverton and Farm Lane in Tewkesbury Borough do not require changes to Green Belt boundaries.
	Table 1	Local areas such as Swindon have long standing problems that cannot be addressed without major expenditure. Who will authorise it in the future?	The Council will work together with local communities to bring forward infrastructure, services and facilities which meet their needs. The local plan will assist in ensuring new development provides for new and existing communities.
	Table 1	companies do not operate non-viable routes. In areas where car is a necessity, what incentive is there to change?	The Council is working with bus operators in a quality bus partnership to improve provision of public transport within the town, through improved facilities and information and improving reliability of buses.
	4.13	Land reservations are taking place spasmodically along general line of a corridor that points to a circular route round west, north and east of Cheltenham. Where does the policy allow for the connecting up of the lengths to form such a cohesive whole? Where is policy PR4?	Policy PR4 should read Policy PR3. Land at Starvehall Farm is allocated in the local plan in response to provisions set out in PPG3 and sustainability criteria.
	4.24	Note commitment towards periphery of urban area to ensure retention of village character and which are also designated as conservation areas.	Comments noted.
	4.31	What is 'Outer West' area? No undeveloped land off Tewkesbury Road within borough.	The Outer West Area forms land identified with a development brief to the south-west of Tewkesbury Road. This area includes existing uses and sites of previously developed land.
	4.33	Disagree. Major changes already taking place and these will continue for some time as GCHQ and Gloscat grow and are fully utilised.	Comments noted.
	4.36	This is dictatorship not democracy. People being pressured into not owning cars because of space restraints - denying people freedom to own cars and keep them close to their homes.	Higher densities and opportunities for reduced car parking standards reflect provisions set out in PPG3, PPG13, and the Cheltenham Transport Plan. In considering applications which reflects these provisions the Council will apply accessibility criteria set out in RPG10.
	4.37	Cheltenham has already lost green belt break in Noverton Lane area and cannot control any further expansion along base of escarpment. Same comment applies to land along Farm Lane and Leckhampton Lane.	See comment in response to paragraph 4.13.

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	4.49	Paras 3.36 and 3.70 include proposals for inappropriate development on green belt land, contrary to aims of preventing coalescence and urban sprawl.	Comments noted.
295	Table 1	<b>Swindon Parish Council</b> Why? What open countryside is being referred to and how will be possible to safeguard it?	See ref. 294.
	Table 1	Distinction should be that Cheltenham remains separate from adjacent land over which borough has no control.	
	Table 1	Local areas such as Swindon have longstanding problems that cannot be addressed without major expenditure. Who will authorise it in the future.	
	Table 1	Bus companies will not operate commercially non-viable routes. Where car is, of necessity, preferred transport, what incentive is there to change?	
	4.13	Reservations taking place spasmodically along general line of corridor that points to a circular route round west, north and east of Cheltenham. Where does the Policy allow for the connecting up of the lengths to form such a cohesive whole? Where is Policy PR4?	
	4.24	Note commitment to 4.21/4.22 which ensures..urban area..still retain their village character and which are also designated as conservation areas.	
	4.31	What is 'Outer West' area off Tewkesbury Road? No undeveloped land there.	
	4.36	This is dictatorship not democracy. People being pressured into not owning a car because of space restraints. ".lower provision of car parking for housing development" will deny people freedom to own cars and keep them close to their homes.	
	4.37	Cheltenham already lost greenbelt break in Noverton Lane area and cannot control any further expansion along base of escarpment. Same comment applies to Farm Lane/Leckhampton Lane. Tewkesbury Borough Local Plan does not indicate any development up to borough boundary on west side of Cheltenham.	
	4.49	Include proposals to use greenbelt. This is inappropriate development and contrary to aims of preventing coalescence and urban sprawl.	
298	4.39 -	<b>Capitec (on behalf of NHS Executive</b>	Comments noted.



Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	4.42	<p><b>South West)</b> Support the Council's aim to promote a range of services within the town centre One of the latest Government Health Initiatives is to promote the development of the network of NHS Walk-In Centres in town and cities around the country. These facilities are designed to reduce the workload on GPs, whilst increasing the accessibility to healthcare. The location of the Walk-In Centre is key to its success. Locations such as city, town and local centres are seen as ideal for such ventures. The plan should support the provision of Walk-In Centres, and other primary healthcare facilities, within these centres.</p> <p>General - Positive planning context for healthcare</p> <p>It is impossible to predict the precise impact of the modernisation of the NHS over the plan period. It is clear that the health service will need to reconfigure itself involving the procurement of new sites and buildings in hand with the disposal of surplus ones. Therefore when you come to consider the development control policies, a general policy supporting improved healthcare provision would be helpful. Although city/local centres are favoured locations for some healthcare facilities, the plan should support provision within residential neighbourhoods and on employment sites.</p> <p>Healthcare uses often generate significant levels of employment. The Executive would welcome some flexibility in employment policies to allow healthcare uses on employment sites where they would be compatible with existing or proposed adjacent employment uses (i.e. not general industrial uses (Class B2)). In some circumstances, particularly if there are no alternative sites available, the balance of policy considerations should be in favour of the need to provide community facilities, such as those for health care. In such cases, the provision of community facilities may need to be given priority over other policy considerations.</p> <p>Should NHS land become available for redevelopment it is important that it is not allocated such that it could prejudice its redevelopment. The redevelopment of such land could provide a contribution to the Council's brownfield redevelopment targets.</p>	
299	4.09	<p><b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> First reference here to allocating land for employment uses. Redrow questions scope</p>	<p>Comments noted. The Council will assess employment needs within the town and options for the allocation of land.</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		for this, bearing in mind shortage of land for employment uses, Structure Plan contained a requirement of only 12 ha, adopted local plan allocates less than a hectare of land for employment uses, new industrial allocations more likely to require land in greenbelt, and previously developed land in urban area likely to be more suitable for housing.	
	4.10	Difference between residual requirement and 'target' figure should be explained in more detail.	Set out in urban capacity study.
	4.12	Cannot understand how balance of nearly 1800 dwellings can be divided into two categories on basis of size when those sites remain unidentified. Need to allocate greenfield site is noted.	Comments noted.
	4.14	Redrow questions need for phasing when development requirements indicate barely more than 10% on a single greenfield site and Cheltenham a relatively small and compact urban area. Approach would not appear to be consistent with government objectives for maximising amount of development on previously developed land.	Phasing of sites will take into account feasibility of sites coming forward, taking into account ownership and land use constraints.
	4.15	Does not appear to be consistent with Circular 6/98 on affordable housing.	Reflects provisions of PPG3 which requires local authorities to reflect local needs and circumstances. Housing need survey of Cheltenham identifies a demonstrable need to lower affordable housing threshold.
	4.17	Limited scope for allocation of employment land without resorting to land currently in greenbelt must be acknowledged.	Findings of employment land assessment will inform local plan on allocation of land for employment use.
	4.19	Some indication of what constitutes 'most versatile employment land', and where it is located, could be included.	Agree.
	4.34	Plausibility of urban capacity study and issue of employment land requirements crucial in any consideration of whether first sentence of this para realistic.	See comments to paragraph 4.17.
	4.37	Council should make clear its own stance on the two proposed housing allocations on edge of Cheltenham in Tewkesbury Borough local plan.	This paragraph sets out that Cheltenham Borough Council have objected to housing allocations in Tewkesbury Borough Local Plan. It is not considered that further information is required in review of Cheltenham Borough local plan.
	4.43	Much more detail is required re current use, assumptions made in urban capacity study, redevelopment potential and effect on existing parking provision.	Set out in urban capacity study.
303	Table 1	"The most architecturally and historically" - this assurance not reassuring given previous damage done to accommodate	Comments noted.

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	Table 2	<p>redevelopment.</p> <p>"Trees will remain and be well maintained" - given pointless devastation on Gloucester Road of magnificent mature trees who would continue to place any trust in this "vision"?</p> <p>02: neither of arcades visually exciting to enter</p> <p>025: original tiny market stalls which drew many residents and visitors to the now often neglected first floor were soon swept away</p> <p>06: Beechwood arcade was very exciting at first, but it was soon 'improved' and is now expensively ordinary. Entrance well built and neat, but whole area boring. The Strand has more unusual shops, but these are being swept away, being steadily replaced by mainly catering facilities. Final blow to this only truly pedestrianised area in Cheltenham is totally unbelievable lengthy barricade of railings erected on corners of St James St. As an accident blackspot or a cut-off point to the remaining shops it is very well designed, but surely not compatible with the visions projected in Key Issues 6.9.</p> <p>07: apart from Promenade Cheltenham has a burden of previously developed unsightly land. Residents choices (requested by the council) have been ignored and we are never given honest reasons for decisions. Some of new developments are an attractive renovation and, one hopes, a sustainable one which will not deteriorate as others have done.</p>	
	Pg13	<p>"The town will remain a high quality shopping and tourist centre for the region" - it WAS a high quality shopping and tourist centre - central railway station, regular buses, three cinemas, two theatres, many specialist shops etc. NOW have a town with an inaccessible, bleak railway station with dismal facilities, two theatres which offer excellent and affordable entertainment unlike the Town Hall which has put their orchestral concerts out of reach of most of the original subscribers, a commercial town centre which blocks all minor roads as far out as The Park, leaving a dead centre open to vandalism at night and a range of multiple, common stores.</p> <p>028: tourist opportunity to visit the famous villages or go to Bristol, Bath or Oxford at will is no longer available. Bleak for tourist, embarrassing for tourist office and claustrophobic for residents with no car. At night there are two theatres and one cinema,</p>	

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	Table 2  Pg 18, 4.50	<p>a town centre dead once offices leave and few shop displays worth looking at. Wine bars and pizza parlours predominate. Toilet facilities are awful for an advertised centre for tourism.</p> <p>035: repeatedly told that council not responsible for bus services so how can it promote sustainable transport choices? I would gladly use it if it existed. The central bus was a good vision.</p> <p>"To provide an attractive approach to the town" - it has always been a relief to turn off Tewkesbury Rd into Gloucester Road and drive under a leafy tunnel, continuing along St George's Road. Cannot believe devastation caused to both of these areas by the 'improvements to the St James site'. How could such desolation have been sanctioned by a council dedicated to maintaining green areas and habitats - on paper?</p>	
305	4.02/ Table 1  4.26  4.30	<p>Object to statement that only "the most architecturally and historically important buildings and others which contribute..will remain". Stated presumption should be that all fabric of this most complete surviving non-industrial 19th century town will be conserved.</p> <p>Not many areas "which detract from general excellence" in Conservation Area. Nor should council "promote development" rather than simply refurbishment, where more appropriate.</p> <p>Rewrite simple prescription for "mixed use" needs to acknowledge established 'Core Commercial Area', which implements PPG6 and is a key instrument of conservation strategy.</p>	<p>Comments noted.</p> <p>Local plan will set out the Council's interpretation of mixed uses, and how mixed use development will be accommodated within the town.</p>
<b>Transport strategy</b>			
<i>general</i>			
182		<p><b>Cheltenham Cycle Campaign</b> perience on continent shows car ownership can rise whilst car usage decreases, therefore consider decoupling these two parameters, eg by referring to a) growing ownership, b) potential increase in use.</p>	<p>Agreed. Where the Draft Development Strategy refers to increasing levels of car ownership and use within one sentence (para. 5.05) it is not intended to imply a correlation between the two issues. Whilst the council recognises the national trend towards increased levels of car ownership, it proposes in its local plan review to reduce car dependency and use through sustainable land use planning and transportation measures which reduce the need to travel and increase people's choice of travel modes.</p> <p><b>Local plan objectives O6, O35</b> <b>Recommendation:</b> local plan review to clarify the distinction between growing levels of car ownership and increased car use.</p>
190		<p><b>Vision 21</b> welcome this document as bringing together in a more practical way</p>	<p>Comments noted.</p>

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	Table1	many of issues highlighted in other papers. We note continued emphasis on sustainability principles throughout paper.  V21 support council's vision for future of Cheltenham as set out here.	
214	5.09	<b>Railtrack</b> ailtrack welcomes objectives and in particular provision of a good quality, affordable, public transport system and better facilities for pedestrians and cyclists and encouragement of their use, and improved integration between public transport services. However Railtrack considers that improvement of facilities at Cheltenham Station and more integrated links between station and town centre should be included as a further objective.-	These specific objectives are already encompassed within the Transport Plan's wider objectives of <i>'improving access to...the town centre'</i> , the need to <i>'provide a good quality public transport system'</i> , and <i>'improve integration between public transport services'</i> . <b>Local plan objective: O35, O36</b> <b>Recommendation: N/A</b>
229	5.6	<b>Prestbury Parish Council</b> Stated objectives do not cover how it is intended to appeal to population over a wide area of county to travel and shop in Cheltenham. Public transport totally inadequate. Need regular, reliable and comprehensive bus service. Local plan does not adequately address these issues.	See key issue transport response.
275	5.01	<b>Stagecoach West &amp; Wales</b> While bus services within part of area are "limited and infrequent", most of urban area and significant parts of hinterland enjoy a high level of public transport provision, and this para should therefore refer to "limited and infrequent bus servces in many parts of this area..."	Agree. <b>Local plan objective: O35, O36</b> <b>Recommendation:</b> local plan review to make it clearer that not all of Cheltenham's rural environs suffer limited and infrequent bus services.
283	5.04  5.01	<b>Cheltenham Friends of the Earth</b> Refers to level of car ownership in Cheltenham. Would be useful if plan could refer to more important social issues associated with the 28% of households which do not have access to a car and rely on public transport system and walking/cycling. Plan shoud set targets to ensure specific standards are achieved for development, eg that all new housing development of a certain size is served by a bus services within***m at a ***frequency during the day and a ***frequency in the evenings until midnight.  Implies that high levels of car usage because of poor bus services. If this is case, most important way of addressing currently unsustainable use of cars is to improve bus services and use development as an opportunity to do this rather than add further traffic to system. Would welcome more support for car free development and specific reference to this in planning obligations.	<b>Local plan objective: O6, O33, 35</b> <b>Recommendation:</b> The local plan review will use the interim transport accessibility criteria set out within RPG10 (Regional Planning for the South West) as a benchmark for major new development.  Agreed. The Cheltenham Transport Plan explains how council's Quality Bus Partnership with a major local bus operator aims to improve the quality of commercial bus services, which are the backbone of the town's public transport system. The council is also preparing draft supplementary planning guidance on planning obligations, This is intended provide greater clarity to developers about the council's requirements for measures to improve the accessibility of development by more sustainable forms of transport. This will include the funding of bus services.

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			<p>The local plan review will also incorporate development control policies which support car free development in the most accessible locations, where the council is satisfied that it does not prejudice future transport proposals and it is not to the detriment of local highway safety, urban design and amenity.</p> <p><b>Local plan objective: O33, O34, O35, O36 Recommendation</b> amend local plan to include policy promoting car free development and citing restrictions.</p>
294	<p>5.03</p> <p>5.04</p> <p>5.05</p> <p>5.06</p> <p>5.07</p>	<p>My written submission on the draft transport plan is a matter of record and should be read in conjunction with this submission.</p> <p>How true.</p> <p>Does not explain that one of reasons for high car ownership in Swindon is lack of adequate public transport. Nor does it suggest that relatively low proportion of car ownership in St Mark's could well be due to presence of an adequate bus service.</p> <p>This para acknowledges that car ownership will increase yet measures are to be taken to reduce car parking facilities both on highway and for new properties. In conflict with para 4.36.</p> <p>Where are these increases in level of traffic going to take place?</p> <p>Scope for improving the worst of these lie outside the borough.</p>	<p>Levels of car ownership are determined by a range of factors including accessibility and economic criteria.</p> <p>PPG13 (transport) recognises that for many trips the availability of car parking is a key factor in people's choice of travel mode. By limiting car parking at new development PPG13 puts the onus on developers to improve the accessibility of sites by non-car modes by choosing to develop in more accessible locations, increasing density of development and improving the quality of pedestrian, cycle and public transport facilities. By reducing the need to travel, the availability of parking and providing people with a choice of travel mode this approach is more likely to reduce car use and car dependency than one which is demand led. Reducing car use is a higher priority, and is more realistic, than reducing levels of car ownership. However the latter may be more likely to occur with demand management measures and public transport improvements in place.</p> <p>Traffic growth will take place in major retail and employment centres and those areas less well served by public transport, walking and cycling facilities.</p> <p>Policy PR3 part (a) is aimed at safeguarding land in order not to prejudice a north west distributor road (NWDR). The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration.</p> <p><b>Local plan objective O32, O36 Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.</p>
295	<p>5.03</p> <p>5.04</p>	<p><b>Swindon Parish Council</b> How true.</p> <p>Quotes car ownership percentages but does not explain one of reasons for high car ownership in Swindon is lack of adequate</p>	<p>See ref. 294..</p>

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	5.05	public transport. Nor does it suggest that relatively low proportion of car ownership in St Marks could well be due to presence of adequate bus service.  Acknowledges car ownership will increase, yet measures to be taken to reduce car parking facilities both on highway and on new properties. In conflict with para 4.36.	
	5.06	Where are increases in level of traffic..close to areas of major development..going to take place?	
	5.07	Scope for improving worst areas, eg PE Way, Kingsditch La etc lie outside borough.	
<i>transport plan</i>			
182	5.09	<b>Cheltenham Cycle Campaign</b> thrd bullet point: Another place where separate reference to facilities and measures would better reflect PPG13 paras 79-80.	Agreed. This section was taken verbatim from the Cheltenham Transport Plan. <b>Local plan objective O33, O34, O35, O36</b> <b>Recommend</b> local plan review to recognise the distinction between facilities and measures.
292	5.08	<b>Gloucestershire County Council</b> Implies that Cheltenham Transport Plan (CTP) is endorsed, in its current form, by County Council. This is not the case. The relationship of the Cheltenham Transport Plan to the County Local Transport Plan is also an issue. The Cheltenham Transport Plan includes objectives and targets which do not directly correspond to those in the statutory Local Transport Plan.	The approach set out in the Cheltenham Transport Plan identifies locally specific objectives, targets and measures for Cheltenham. These need not mirror the Gloucestershire LTP to still be within the overall context of the Gloucestershire LTP. This is not the same as endorsement. The Cheltenham targets are provisional, being subject to further review using the Strategic Transport Model.
	5.09	Objectives of CTP do not directly correspond to objectives for Cheltenham included within the Local Transport Plan (LTP). Should be made clear CTP objectives are in addition to and support objectives in LTP and structure plan. Where objectives overlap, reference should be made to relevant LTP objectives. CTP sets targets which do not correspond with LTP.  Local Plan should provide guidance in clear and unambiguous terms. Including reference to targets in CTP which do not directly correspond to those in LTP, a statutory document, can only lead to confusion.	
<i>traffic management</i>			
214	5.11-5.16	<b>Railtrack</b> aims to identify or assess potential for transport of freight via rail within Borough. Government is keen for use of rail freight to be increased and road freight to be reduced, as part of overall aim for sustainable transport. Rail freight, according to White Paper on Integrated Transport, also brings about environmental benefits. Sites that are capable of fulfilling this need for rail related schemes, including those for waste and minerals should therefore be identified and	The local plan review continues to safeguard the route of the Honeybourne Line as a potential public transport corridor, providing a rapid transport system serving the Gloucester-Cheltenham corridor and Bishops Cleeve. This reflects the provisions of government guidance which requires that local plans should address the land use implications of the local transport plans (PPG12/13).  Scope for a rail freight terminal within Cheltenham is limited - there is a lack of trackside sites of

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		safeguarded in development plans. Taking into account Government's guidance and aspirations for rail freight, Railtrack requests Council assist in identification of suitable locations for rail freight - where feasible and practicable, taking into account wider Plan objectives - which should then be safeguarded and allocated in the review local plan.	sufficient size and shape to accommodate an operationally attractive track layout, freight handling/storage facility and highway access. Commercial rail freight terminals may be more feasible elsewhere, such as at Gloucester, Quedgeley and Aschurch, where fewer constraints may apply. <b>Local plan objective O35</b> <b>Recommend no change</b>
229	5.15	<b>Prestbury Parish Council</b> Details of any 'roads identified as suitable corridors for the carriage of freight and through traffic' should be clearly identified in Plan.	A road hierarchy of main radial routes, local distributor roads and town centre ring roads is shown in Figure 7.1 of the Cheltenham Transport Plan. <b>Local plan objectives O34, O36</b> <b>Recommend no change</b>
292	5.12	<b>Gloucestershire County Council</b> Would be logical to have same targets in respect of accidents - currently differ. Target suggested to contain delays to traffic is not an aim in LTP and has an inference of spending to assist and encourage car use.	All Cheltenham targets relate to the time frame of the plan, up to 2006. In some cases the county LTP targets extend beyond this period to correlate with national targets. In these cases it is more appropriate to compare Cheltenham targets with interim LTP interim targets for 2006, where these are set. Upon closer scrutiny the Cheltenham 2006 target of a 30% KSI reduction is not far removed from the LTP 2010 target of a 50% reduction. The traffic delay target recognises the negative impacts of congestion on the economy, amenity, air quality and health, and the viability of public transport services which often have no alternative but to share carriageway space with other users. Demand management measures are strongly supported in the Cheltenham Transport Plan as a key element in controlling road traffic growth however they cannot be considered in isolation. <b>Local plan objectives O34</b> <b>Recommend</b> Consideration will be given to revising accident target to coincide with LTP time scale.
294	5.16	Measures to reduce traffic speeds should concentrate on setting appropriate legal limits along stretches of roadway, not isolated and very localised measures.	The local plan does not deal with detailed transportation issues. Speed reduction measures should focus on addressing known safety problems and are must also comply with national regulations.
295	5.16	<b>Swindon Parish Council</b> Measures to reduce traffic speeds should concentrate of setting appropriate legal limits along stretches of roadway not isolated and very localised measures.	see ref. 294.
<i>alternatives to the private car</i>			
214	5.18/9  5.25	<b>Railtrack</b> Fails to identify potential for rail-based park and ride. Development strategy fails to examine potential for implementing such a scheme in Cheltenham.  Railtrack welcomes provisions indicated, however Railtrack considers initiatives not sufficiently identified and promoted in other issues documents reviewed.  Railtrack supports any proposals which will result in improved services and transport	The strategy states that ' <i>the council will seek to improve facilities for travellers by encouraging more frequent services, better facilities at the station, increased public transport links to the town centre and other parts of the town, and better provision for car and cycle parking.</i> ' These improvements, which would help increase use of Cheltenham station for park and ride and kiss and ride, are also promoted in the 'Cheltenham Spa Railway Station Development Brief', adopted by the council as Supplementary Planning Guidance in April 2000. <b>Local plan objective O35, O36</b>



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		interchange facilities at railway stations, provided that these proposals are operationally, technically and commercially acceptable and viable and have the support of the relevant Train Operating Company/ies.	<b>Recommendation</b> N/A
229		<b>Prestbury Parish Council</b> No reference in document to coach network operating from Cheltenham. Provides cheap and convenient transportation. Is it part of strategy to discourage these services?	Comments noted. Coach travel will be encouraged. <b>Local plan objective O35, O36</b> <b>Recommendation</b> Local plan to include specific reference to the important role of coach services particularly for longer distance journeys.
275	5.19	<b>Stagecoach West &amp; Wales</b> Borough should not limit its ambition to providing bus priority measures on those corridors where park and ride exists, but should include all corridors enjoying high levels of public transport with dense passenger flows.	Comments noted.
283		<b>Cheltenham Friends of the Earth</b> Support intention to restrict supply of parking in town centre, but proposals do not go far enough and local plan should be seeking long term large reductions with support for alternative means of access.	The effect of urban design and transport plan proposals on the town centre will be subject to monitoring and review so as to ensure that they continue to meet their objectives. Users of the town centre have a wide range of needs, some conflicting. By implementing changes in phases they are more likely to retain a broad level of public support, thereby making them more deliverable. Proposals must be ambitious enough to make a real, positive, difference to the town centre without alienating key stakeholders in the process. <b>Local plan objectives O8, O19, O24, O33, O34, O35</b> <b>Recommendation</b> N/A
290		<b>Cyclists Touring Club</b> In stating a target for increasing the level of cycling (para 5.21) whilst also referring to the level of cycle accidents, it would seem logical to also state the target for reducing accident levels in the same para, from the Glos Road Safety unit's statistics.	Comment noted. <b>Local plan objectives O34, O35</b> <b>Recommendation:</b> Consideration will be given to adopting county LTP cycle accident casualty targets T5 and T6.
292	5.21  5.23	<b>Gloucestershire County Council</b> CTP cycling target is very low. If it were to make this the cycling target of all trips to town centre this would be a worthwhile target.  Suggested target for walking in LTP4%, CTP seeks to improve by 5%.	The cycling target is considered to be pragmatic given that the baseline level of cycle use in Cheltenham is significantly higher than in Gloucester and other areas of the county. <b>Local plan objectives O34, O35</b> <b>Recommendation:</b> Consideration to be given to amending the Cheltenham cycling and walking targets.
294	5.18  5.22  5.25	A commercial company will not operate a non-viable route, but small outlying developments are equally entitled to a service as are inner town dwellers.  Segregation of cyclists, pedestrians and cars would improve cycling safety.  To no avail if outlying residents cannot get into system in first place.	- The viability of routes can be influenced by measures implemented by the council and operator through the Quality Bus Partnership. Where routes are not commercially viable the county council has powers to provide financial support. - Segregating cyclists from motorists may not result in greater levels of cycling and increased safety as it will result in more instances of conflict at junctions where on-road cyclists would have priority. - comment noted.
295	5.18	<b>Swindon Parish Council</b> Commercial company will not operate an unviable route, but outlying developments equally entitled to	see ref. 294.

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	5.22	a service as inner town dwellers. Segregation of cyclists, pedestrians and cars would improve cycle safety.	
	5.25	All to no avail if outlying residents cannot get into the system in the first place.	
307		<b>GCHQ</b> Integrated public transport is still not a reality in Cheltenham, or elsewhere, and will be very unlikely to be achieved within the plan period. Consequently, a realistic approach, taking on board accessibility factors needs to be adopted for the GCHQ site.	Comments noted.
<i>demand management</i>			
292	5.26	<b>Gloucestershire County Council</b> CTP seeks to restrain traffic to 5% above 1996 levels in 2002. This compares with target in LTP of 15%.	Comment noted. <b>Local plan objective O36</b> <b>Recommendation:</b> Consider reference to LTP Central Severn Vale target CSV2 and an interim, amended, CTP target aimed at 'daily flows' rather than 'am peak' flows, to address possibility of peak spreading.
294	5.27	Consider system of exchange for those with residents parking permits to allow use of their parking space during day, in exchange for space at their workplace.	Measures must also be simple and manageable. The local plan is not the appropriate forum for detailed transport proposals.
	5.30	Measures to reduce traffic speeds should concentrate on setting appropriate legal limits along stretches of roadway, not isolated and very localised measures. Pedestrianisation good if 100% pedestrianised for 100% of time.	[para 5.30] see response in 'Traffic Management' section.  Experience of pedestrianisation in other towns and cities demonstrates that pedestrians can safely mix with vehicles where traffic levels are low and speeds slow. Direct public transport access to the centre, by bus, can also improve the natural surveillance of an area, particularly in evenings when there may otherwise be greater opportunity for crime and disorder. <b>Local plan objective O8, O16, O19, O24, O26, O28, O35, O36</b> <b>Recommend</b> amend local plan polices to reflect principles of the Cheltenham Transport Plan and Urban Design Framework.
295	5.27	<b>Swindon Parish Council</b> Consider system of exchange for those with conveniently located residents parking permits to allow use of their space during day in exchange for space at work.	see ref. 294.
	5.30	Measures to reduce traffic speeds should concentrate on setting appropriate legal limits along stretches of roadway not isolated and very localised measures. Pedestrianisation good if 100% pedestrianised 100% of the time.	
307		<b>GCHQ</b> Whilst the local plan must acknowledge the benefits of promoting a sustainable development strategy, the imposition and application of car parking	Comments noted.

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		standards to new developments, or expansions to existing operational sites, must have regard to the location of the site in question and its accessibility from a wide geographical area by methods other than the car. At present it appears that there is a diverse range of parking standards in force and no commonly agreed interpretation of the application of these standards that has regard to local site circumstances. Site specific locational factors, rather than a "blanket" approach to the whole of Cheltenham is required and appropriate consideration needs to be given to the relative accessibility of different parts of the town.	
<i>major transport schemes</i>			
213		<b>Highways Agency</b> Note that transport strategy includes Northern Relief and other new roads. As these conform to County Travel Plan, Agency makes no comments, but should these proposals be progressed in the future then consultation with the Agency will be required.	Comments noted.
229	5.32	<b>Prestbury Parish Council</b> Inconsistent to safeguard 'more sensitive areas of the town' and to drive distributor road through green belt land close to villages. Should also be noted that Swindon village and Prestbury singled out for praise in Latham Architects report and developments that damage environment of these villages should not be permitted.	The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.
292	5.32	<b>Gloucestershire County Council</b> Inference is that new roads are an essential strategy of CTP. These schemes need to be properly appraised before inclusion in Local Plan. The three link road schemes could encourage use of cars and there is not necessarily a need for these roads to support development in the respective areas  County Council continues to find no case for this road and could not provide necessary highway authority support for scheme at local plan inquiry.	Comments noted. See re. 229, and Key Issues responses.
294	5.32	Do not believe that stated function of this road will be achieved. Concept rejected by large proportion of inhabitants and by County Council and should be removed from plan.	see ref. 292..
295	5.32	<b>Swindon Parish Council</b> Do not believe that the stated function of this road will be achieved. Concept rejected by large proportion of inhabitants and by County Council so should be removed from Plan.	see ref. 292.

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
<i>Park and ride</i>			
106		I am pleased about the proposed extension of Park and Ride, and hope that the buses will be able to pick up passengers en-route. Bus services along the A46 and Bath Road are badly needed.	Comments noted.
127	5.34	<b>Leckhampton Parish Council</b> Park and Ride schemes. This Council has a particular interest in the proposal for such a scheme with a terminus on the A.46 Shurdington Road. We note that the Borough Council has commissioned a study of possible sites, and would be interested to have a copy of the brief given to the group if that is possible. Our own view is that the site should be on the north side of the A.46, and south-west junction with Up Hatherley Way. We would like to feel that our local knowledge might be of some value, and would welcome an invitation to comment on specific possibilities at any stage in the process.	Comments noted <b>Local plan objective O35</b> <b>Recommend</b> Local plan review to consider findings of park and ride study. Consider inviting Area Committee to Local Plan Stakeholder Group. This group will have an input in the review of the local plan.
162	5.34	I wish to object very strongly to any Park and Ride development taking place on the A40 East, London Road. I have not seen detailed plans for this development yet, but understand from the Echo it will be at the Cheltenham town end of the Dowdeswell Reservoir. This is a particularly beautiful approach to the town, along a narrow, by modern standards, old 'main road'. The Cotswold Way passes nearby. The existing industrial development (Alan Dick) on the north side is to be regretted. The source of the Chelt is in this area. Any large cleared area to accommodate the cars would be inappropriate and unsightly. The buses taking passengers into town would have to turn right against the traffic on this very busy road with all sorts of traffic. Surely this would be an unwanted hazard.	Park and ride facilities and improved local bus services represent the main alternatives to use of the private car in Cheltenham, particularly for residents living in rural areas outside Cheltenham which are poorly served by public transport. The transport strategy of the local plan will consider opportunities for developing further sites and priority bus measures on the main radial routes into the town. To minimise the potential impact of sites on AONB and Green Belt the council's transport plan emphasises the need for sites to incorporate sensitive design and landscaping.  A planning application for the development of a country park and park and ride facility was submitted to the Council on 5.11.01. The merits of a park and ride scheme in this location will be fully explored in consideration of the application. <b>Local plan objective O35</b> <b>Recommend</b> consider findings of park and ride study.
201		<b>Tewkesbury Borough Council</b> Cheltenham's Local Plan will be unable to allocate Park & Ride sites outside its Borough boundary. Sites that are within Tewkesbury Borough would need to be identified in the Tewkesbury Borough Local Plan; or would be subject to a planning application made to this authority.	Comments noted. Travel patterns disregard electoral boundaries. Many of the potential users of park and ride services would originate in Tewkesbury. <b>Local plan objective O35</b> <b>Recommend</b> consider findings of park and ride study.
281	5.34	<b>Up Hatherley Parish Council</b> Support concept of Park and Ride, but only if parks are suitably placed and sustainable. Propose protocols to be followed prior to implementation of a new site as follows:  1. Detailed research to be carried out to establish how P&R schemes are working in other towns similar in size and character to	Comments noted. <b>Local plan objective O35</b> <b>Recommend</b> consider findings of park and ride study.

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		<p>Cheltenham.</p> <p>2. Financial appraisal be made of the two P&amp;R sites already operating in Cheltenham.</p> <p>3. Careful thought be given to phasing of introduction of new sites, along with production of a priority scheme.</p> <p>4. Business plan, addressing bus journeys, routes and times, be produced for each proposed new site, and published as part of the consultation exercise along with the report flowing from the three points mentioned above.</p>	
291	5.34	<p><b>Leckhampton Green Land Action Group</b> Regarding site on A46, strongly urge that it not be located on highly visible rising ground on south side of road where it would detract from important views of Cotswold escarpment and be highly visible from AONB. Locating site on north side of road beyond junction with Up Hatherley Way would require cooperation with Tewkesbury Borough Council.</p> <p>Proposal: brief for study of potential sites should draw attention to importance of preserving quality of visual approaches to town. If this not now possible, this aspect should be taken fully into account in considering results of study.</p>	<p>Comments noted.</p> <p><b>Local plan objective O35</b> <b>Recommend</b> consider findings of park and ride study</p>
<i>rapid transport system</i>			
229	5.37, 6.05	<p><b>Prestbury Parish Council</b> Statement appears to conflict with use of this land for a pedestrian and cycle route into town. Also understood that Railtrack own the land and have plans for its use as a freight line.</p>	<p>Cheltenham Borough Council owns a significant length of the former Honeybourne Line, with Gloucestershire Warwickshire Railway owning the rest. Physically it may be possible for the line to accommodate both cyclists and a rapid transport system. The council has asked Railtrack to clarify its requirements and time scale for its rail freight proposals.</p> <p>The local plan review continues to safeguard the route of the Honeybourne Line as a potential public transport corridor, providing a rapid transport system serving the Gloucester-Cheltenham corridor and Bishops Cleeve. This reflects the provisions of government guidance which requires that local plans should address the land use implications of the local transport plans (PPG12/13).</p> <p><b>Local plan objective O35</b> <b>Recommend</b> no change</p>
274		<p><b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> In our view, to meet objectives re time delays and radial routes will be essential to maximise opportunities that do not involve existing road network. Need strategy based on maximising opportunities to improve public transport both in terms of its scope and efficiency. Believe P&amp;R facility at the Racecourse should be enhanced and Hunting Butts site developed to deliver a new public transport corridor to town by means of a guided bus system along the Honeybourne line. Associated access road proposals</p>	<p>Comments noted. See ref. 229..</p>

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		would be designed so as not to prejudice and mainly benefit potential implementation of a north west distributor road bypassing Swindon Village. Believer that land use strategy, particularly in relation to provision of housing land, should recognise these benefits and the strategy be amended accordingly.	
283	5.37	<b>Cheltenham Friends of the Earth</b> Support Rapid transport system.	Comments noted.
<i>locational policies/safeguarding</i>			
292	5.40	<b>Gloucestershire County Council</b> Gives impression that road schemes seen as first priority.	Comments noted. Emphasis on road schemes not intentional.
	5.44	Sites must be accessible to all non-car modes. "or" needs to be deleted in fourth line and replaced with "and".	Agreed. <b>Local plan objective O35 Recommendation</b> Local plan to be amended to incorporate modal split requirements of the county LTP.
294	5.44	Great provided residents in outlying areas can get to centres in first place.	Comment noted. See ref. 292.
295	5.44	<b>Swindon Parish Council</b> Great provided residents of outlying areas can get into centre in first place.	Comment noted.
299	5.42	<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Précis of general guidance rather than a consideration of how guidance relates to Cheltenham in particular.	Comments noted.
<i>transport assessment/travel plans</i>			
182	5.50	<b>Cheltenham Cycle Campaign</b> Another opportunity to propose tighter requirement for production of travel plans.	Comments noted.
283		<b>Cheltenham Friends of the Earth</b> Support use of travel plans but not convinced they are being used effectively or monitored. Monitoring and enforcement should be addressed in planning obligations section.	Comments noted.
286	5.51	<b>Robert Hitchins Ltd.</b> Needs to be clarified - under what circumstances will and how can such plans bind a developer?	PPG13 sets the general context for the types of development where local planning authorities are encouraged to require a travel plan. Travel plans are more likely to be secured through planning obligations where the consequences of failure would be greatest and also where future owners of the development will be required to comply with the terms of the travel plan. <b>Local plan objectives O6, O8, O19, O33, O35, O36</b> <b>Recommendation:</b> Amend local plan to incorporate requirements of PPG13.
292	5.46	<b>Gloucestershire County Council</b> Assessments have to address all issues of accessibility to site and should address local deficiencies in footway, cycle and public transport networks to ensure developments meet objectives set out in plan. They are not only intended to seek measures to "reduce	Comments noted. See previous comments in Key Issues regarding use of RPG10 Transport accessibility criteria.

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		the impact of additional traffic".	
<i>parking</i>			
283		<b>Cheltenham Friends of the Earth</b> Support greater use of underground car parking as part of development where parking necessary.	Comments noted.
<i>planning obligations</i>			
292		<b>Gloucestershire County Council</b> Supplementary Planning Guidance for obtaining planning obligations for transport is currently being investigated by CBC in consultation with GCC. Whilst County support aim, not yet fully clear if an acceptable mechanism can be found. at County level.	Comments noted.
<b>Land Allocated for Development</b>			
<i>PR 1</i>			
119		<b>Prowting Projects</b> Objection based on; (a) insufficient housing provision (b) insufficient sites designated (c) omission of Swindon Farm, Swindon Village from the site schedule In response to Urban Capacity report, we draw attention to the need to increase the Plan's housing provision by an additional 496 units and to designate more land on the proposals plan for a 5 year supply [i.e. 1,400 units]. We submit that these twin requirements can be met, inter alia, through designation of Swindon Farm for housing.. The location of the site is shown on the attached O.S extract. (see file copy).	In identifying housing supply to meet the first 5 years, the local plan has taken into account both identified sites, phased pre 2006 and allowance for windfalls in line with para.36 of PPG3 which states that "authorities should make specific allowances for all the different types of windfalls in their plans". An assessment of dwelling projections in the Urban Capacity Study identifies that potentially 939 dwellings made up of large and small windfalls may come forward during the first 5 years of the plan, together with identified sites this approximates closely to the estimated 5 year housing requirement. The Study recognises that there may be some implementation delay in one site, however, this will be closely monitored over the plan period. Government guidance sets out that only if there are no suitable sites in town should the Council begin to look at the edge of the town. <b>Local plan objective O6, O7, O12, O13, O19, O20, O22</b> <b>Recommend</b> review of urban capacity study.
158	6.03	<b>Gloucestershire Constabulary</b> support policy PR1 which allocates 'Land at Lansdown Road' for housing development. It is a previously developed site which benefits from very good transport links to Cheltenham Town Centre and the surrounding urban towns. The site comprises modern office blocks, which are out of keeping with the surrounding area and which detract from the character and appearance of the Central Conservation Area. PPG15 encourages redevelopment of existing gap sites of buildings that make no positive contribution to the character and appearance of a conservation area. The replacement should be a stimulus for imaginative, high quality design, and redevelopment of this site should be seen as an opportunity to enhance the area. However the site boundary shown on Plan 2 is incorrect. The amended site boundary is shown on the attached site location plan (Plan ref: 93558.040/2963).	Comments noted <b>Local plan objective O7, O11, O12, O13, O19, O22</b> <b>Recommend</b> Urban capacity will be revised to take into account revised site area. PPG3 requires local authorities to apply increased densities to new development. However, the application of increased densities within the context of the site and adjacent development must be considered. Innovative design solutions may enable higher densities to be considered on this site, this will be considered in the revision of the urban capacity study.

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		The revised boundary includes the police station and administration block but also incorporates Wilton House, a Regency period villa to the west of the site which is currently used for training purposes by the Constabulary. The Constabulary appreciates the importance the villa might play in any future proposal.	
215		I wish to request that the land at Benton and Ireton, The Park be removed from the list of land allocated for housing development. What is proposed is not appropriate for this conservation area.	Comments noted. <b>Local plan objective O5, O6, O7, O11, O12, O22 Recommend</b> allocation removed from local plan review following refusal of planning application for redevelopment (ref 01/00181).
226		<p>I write to ask that the land at Benton and Ireton, The Park be removed from the list of land allocated for housing development. The implementation of PPG3 to identify areas suitable for high density development is not appropriate for conservation areas such as The Park, where it would overwhelm the green and open space character of this area.</p> <p>We are not a town that profits from much industry - we prosper because we have a character that appeals to tourists, artists, literature, musicians, those seeking retirement, to headquarters of high flyers such as Kraft and Chelsea Building Society, famous public schools, a highly respected grammar school, GCHQ and UCAS and now our own university.</p> <p>Despite a disregard during the 50s and 60s Cheltenham has saved much of its heritage and is admired by those towns who have lost their own. Don't let us lose our character and heritage now to PPG3. Please remove Policy PR1 (d) from Draft Development Strategy.</p>	Comments noted. <b>Local plan objective O5, O6, O7, O11, O12, O22 Recommend</b> allocation removed from local plan review following refusal of planning application for redevelopment (ref 01/00181).
239		Number of references in documents to proposal to creat 44 housing units on Benton/Ireton sites. These sites have been subject to due process before and have failed to gain planning consent. Planning Committee, not council officers, must be sole arbiters of future of conservation areas. A further application to build on these sites was heard on 17/10/01. It was rejected. With this history in mind, Park proposal must be removed from draft development strategy forthwith.	Comments noted. <b>Local plan objective O5, O6, O7, O11, O12, O22 Recommend</b> allocation removed from local plan review following refusal of planning application for redevelopment (ref 01/00181).
272		One large greenfield development proposed - Starvehall Farm. Important that some of this land be kept green, probably for continued use as a playing field, which should be possible given size of proposed development. Moreover, as site within comfortable walking and cycling distance of town centre and buses passing close by, should be possible to make this a 'low car ownership' area.	Comments noted. <b>Local plan objective O6, O11, O12, O16, O18, O35, O36 Recommend</b> development brief will be prepared to guide future development of land at Starvehall Farm.
273		Reference plan of Lansdown Road is	See ref. 158.



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		incorrect and they [police authority] will be seeking to have entire Lansdown Road site placed within the Plan. Whilst this should not be taken as an indication that the Divisional HQ will be dispensed with, restrictions on the size of the site may prevent the Authority from taking advantage of any different circumstance in the future.	
285		<b>PARC</b> Please remove Park from this schedule which refers to Benton and Ireton. Believe that it is wholly wrong to include Benton and Ireton because it projects an assumption of approval for development which is very probably against policies in local plan.	Comments noted. <b>Local plan objective O5, O6, O7, O11, O12, O22 Recommend</b> allocation removed from local plan review following refusal of planning application for redevelopment (ref 01/00181).
292		<b>Gloucestershire County Council</b> Moorend Road - adjacent to area of Roman activity; archaeological evaluation may be required. St Margaret's Road - on edge of medieval borough; archaeological evaluation will be required. Portland Street - on edge of medieval town; archaeological evaluation will be required. Gloucester Road - evidence of Roman settlement in vicinity; archaeological field evaluation will be required. New Barn Lane/Prestbury Road - potential for evidence of prehistoric and Roman settlement; archaeological evaluation will be required.	Comments noted.
305	6.03	Premature to seek high density infill in grounds of 'Benton & Ireton, The Park', Policy PR1(d), because conservation area cramming not been established as being necessary to implement PPG3 in Cheltenham.	Comments noted. <b>Local plan objective O5, O6, O7, O11, O12, O22 Recommend</b> allocation removed from local plan review following refusal of planning application for redevelopment (ref 01/00181).
<b>PR2</b>			
119		<b>Prowting Projects</b> Objection based on; (a) insufficient sites, based on 12 ha requirement (b) no strategic sites shown, despite regional requirement (c) omission of Swindon Farm and Manor Farm, Swindon Village from the sites schedule	The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employment sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town. <b>Local plan objective O19, O20, O21 Recommend</b> consider findings of report considering demand for employment land and assessment of sites.
292		<b>Gloucestershire County Council</b> Albion Street/Gloucester Place - on edge of medieval town; archaeological evaluation will be required.  St George's Street/St James Square - evidence of prehistoric and Roman settlement in vicinity; archaeological evaluation will be required.	Comments noted.

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		Objection is made to allocation of St George's Street/St James' Square site for only 8 dwellings. Proposed that this be at least 45 units - compared to proportion of housing to commercial on other sites in table, this is a low estimate of the site's residential capacity. Objection made to proposed timescale for redevelopment of the site. It is proposed that development of this site be brought forward to "pre 2006" - land is in large part underused, providing temporary car parking. General dilapidated state of buildings and walls makes this a candidate for immediate redevelopment.	Review of urban capacity study will consider opportunities for increased housing density and phasing schedule for land at St. James' Square.
305	6.05	Policy PR2(b) 'Gloucester Place Development Brief' - sustain my objection, as detailed in my response to this Brief, to any pre-commitment to an excessive residential percentage inside Core Commercial Area. ...."development brief lies entirely within Cheltenham's Core Commercial Area, whose primary purpose is to contain all forms of commercial development so that it does not spill out into the predominantly residential districts of the conservation area. Therefore to achieve this concentration role, office, leisure and retail uses need to be disproportionately favoured on these sites ahead of residential".	The Core Commercial area does not preclude the development of housing. The local plan will promote sustainable development principles set out in PPG1, including promotion of mixed use development. <b>Local plan objective O5, O6, O11, O22, O35, O36</b> <b>Recommend</b> no change
<b>PR3</b>			
274		<b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Support safeguarding of land for public transport system on Honeybourne line, but believe this opportunity should be more forcibly promoted in the development strategy.	Comments noted.
292		<b>Gloucestershire County Council</b> Each of proposed new roads will need archaeological assessment at an early stage in their planning.	Comments noted
<b>Table 3</b>			
299	Table 3	<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Gives indication of phasing. Clearer indication needed of how land supply is likely to be maintained beyond 2006 and how these figures relate to others in the strategy, especially the 1890 dwelling commitments (para 4.10) and 622 on identified sites in UCS (para 4.13).	Comments noted. <b>Local plan objective O5, O6, O7, O22</b> <b>Recommend</b> review of urban capacity study will inform phasing policy of local plan.
<b>PR3 North West Distributor Road - objections</b>			
76		Yet again I would like to register my objection for the NWDR, hundreds if not thousands of people not just in Swindon Village, but Springbank, Arle Farm, Fiddlers Green and Uckington are all against it and have justified our reasons on numerous occasions. Its about time the council listened to what the people of these districts want and not just	Comments noted. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.

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		cause a fuss when planning applications are made on their own patch.	
115	Pg10	Distributor road goes to Hyde Lane, not Bishops Cleeve. When Bishops Cleeve was extended, was public transport inserted to reach all the housing. Will B.C residents go on a long route to the shops?	Bishops Cleeve is located outside the administrative area of Cheltenham Borough Council. The local plan may only plan to meet development needs within its boundaries. <b>Local plan objective O32, O36</b> <b>Recommend N/A</b>
133		We wish to object strongly to the double standards being carried out by the council. Page 4 of the Clarion 'Protecting Our Countryside' you state that land to the North west and south of Cheltenham is designated as Green Belt land, and is to be protected. Page 10 goes on to say that a NWDR is included as a concept. This is totally unacceptable, and against the wishes of nearly 5000 objections on the last public consultation. We do not trust the council when you say that the road will not bring additional housing and industrial development. How can we expect our views to be respected when Project Nexus previously ignored the 98% against the NWDR. This road must be deleted from the plan.	The review of the local plan will reflect proposals set out in the Cheltenham Transport Plan adopted by the Council resolved at a meeting on 2 July 2001 that the NWDR would not be funded by development in the Green Belt. The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.
135		<b>Green Belt Protection Society 2001</b> standard letters handed over to the Mayor on 12 October 2001. 95 other standard letters sent in individually. Text as follows:  I am writing to register my strong opposition to the inclusion of a North Western Distributor Road in the [Cheltenham Local Plan]. You will know that this scheme has already attracted overwhelming opposition. I am greatly perturbed that the promotion of the Local Plan in the Clarion has failed yet again to reveal that this planned road will cut through designated Green Belt. The loss of this important and protected land is totally unacceptable. I ask that the scheme for construction of a NW Distributor Road be deleted immediately from the Local Plan. You do not, and never did have, a mandate from the electorate for this senseless concept. The Green Belt must remain unaltered so that future generations can enjoy its benefits. Although my prime objection is the encroachment upon and loss of Green Belt, there are a number of secondary, but still very important objections. These include the failure to make any credible case for a new road and the failure to investigate other potential solutions - both of which are contrary to Government guidelines.  It is also inconceivable that development, housing/commercial, would not take place in	The review of the local plan will reflect proposals set out in the Cheltenham Transport Plan adopted by the Council on 2 July 2001. At this meeting of Council, Members resolved that the NWDR would not be funded by development in the Green Belt. The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes.  The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration. <b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.

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		<p>the surrounding Green Belt area - this in itself would only lead to greater traffic problems.</p> <p>In closing, I find it deplorable that Cheltenham Borough Council has ignored the results of its own consultation on this issue (at a cost to us, the ratepayers, of over £10,000) which found support for the NW Distributor Road from a mere 2% of respondents with almost 98% of views expressed strenuously opposing the scheme.</p> <p>Please ensure my opposition is noted in any summary documents and is brought to the attention of all committees debating the issue.</p> <p>(Breakdown of 2001 letters: Built-up area of Cheltenham excluding areas most affected - 970, Bishops Cleeve, Woodmancote, Southam and Stoke Orchard - 90, Gotherington, Gretton, Greet &amp; Winchcombe - 27, Gloucester areas - 106, residents of villages lying to south and east of Cheltenham - 73, villages towards Tewkesbury &amp; Evesham - 56, out of area - 46, residents of areas most affected - 633)</p> <p>Additional issues raised in covering letter to mayor:</p> <ol style="list-style-type: none"> <li>1. The waste of expenditure that will be incurred if a public inquiry is invoked.</li> <li>2. Concentrate efforts and budget into developing local road solutions.</li> </ol>	
136		<p>The NWDR will not reduce congestion. The housing that will be built to fund it will ultimately lead to even greater traffic loads than we currently have. The Green Belt should remain green.</p>	<p>See ref. 135.</p>
143		<p>Oppose inclusion of the concept of a NWDR road within the local plan.</p> <p>* Although the council has voted to include the concept, I do not agree that the need to include it on transport planning grounds has been established. Despite the council's brief and broadbrush references to traffic studies in relation to the potential for the reduction of congestion and pollution, no convincing traffic management research material has been made available for public consumption in support of the claim that the road would successfully resolve these issues. Gloucestershire County Council excluded the concept from the Structure Plan Second Review. The report of the Panel shows that the traffic benefits from the scheme are not compelling when ranged against the impact of a new road in the Green Belt. The</p>	<p>The review of the local plan will reflect proposals set out in the Cheltenham Transport Plan adopted by the Council on 2 July 2001. At this meeting of Council, Members resolved that the NWDR would not be funded by development in the Green Belt. The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes.</p> <p>The concept of the NWDR will be fully assessed through the local plan review process, including investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration.</p>

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		<p>Department of Transport has previously indicated that this scheme would not be acceptable as part of Cheltenham's Transport Planning Policy.</p> <p>* The council has not satisfactorily explained why it wants to go out on a limb to promote this strategy in contradiction of its own stated policies when both County and National Government have already considered the concept and turned it aside for very specific reasons. The suggested route passes through Green Belt land and the proposal contravenes CBC policy and also that of the County and National Government.</p> <p>CBC Local Plan para 16.25 'Council will resist proposals for development in the Green Belt areas in order to provide a source of funding for the NWDR or other roads'</p> <p>PPG2 'Existing Green Belts should only be altered in exceptional circumstances'</p> <p>Draft RPG10 'The Green Belt exists to protect open land around and between urban areas'</p> <p>Draft RPG10 Policy 5 'The RPG supports the strategic principles of Green Belt policy'</p> <p>GCC Structure Plan Policy GB1 'The Green Belt between Gloucester and North Cheltenham will be maintained. Within the Green Belt only appropriate development which would not compromise the open character of the Green Belt or which would not contribute to the coalescence of the settlements will be permitted'</p> <p>* The council has not explained how it would fund the road development given that the County and National Government are not in support. It has stated that in-fill housing development is excluded as a source of funding from its present agenda. However it omits to say what may happen on expiry of the term of the current local plan.</p>	<p>Government guidance (PPG2) sets out provisions for development within Green Belts. "The statutory definition of development includes engineering and other operations, and the making of any material change in the use of land. The carrying out of such operations and the making of material changes in the use of land are inappropriate development unless they maintain openness and do not conflict with the purposes of including land in the Green Belt". In line with this guidance the development of a NWDR within the Green Belt would not require amendment to Green Belt boundaries and is permissible given that development as "far as possible contributes to the achievement of the objectives for the use of land in Green Belts".</p> <p>In its second review of the Structure Plan the County resolved to delete proposals for a North West Bypass, not a North West Distributor Road. The latter scheme would provide an additional link between the A40 at Benhall and the A4109 Tewkesbury Road. This would offer greater opportunities to reduce traffic levels on Princess Elizabeth Way and Kingsditch Lane, and implement improvements for the benefit of public transport users, cyclists and pedestrians. As previous traffic studies were of limited scope and considered a smaller study area their results cannot be relied upon to provide an accurate assessment of the viability and benefits of the more substantive north west distributor distributor road concept.</p> <p><b>Local plan objective O32, O36</b>  <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.</p>
151		<p>We write to affirm our strong opposition to plans for a North West Distributor Road, as already expressed in our letter to you dated 9th October 01, and to request that our objections to the proposed scheme be noted with the many others we know you will receive leading up to the closure of the public consultation period.</p> <p>We fully support action currently being taken by the Greenbelt Protection Society. The worries and concerns expressed over the loss of precious areas of greenbelt with all</p>	<p>The review of the local plan will reflect proposals set out in the Cheltenham Transport Plan adopted by the Council on 2 July 2001. At this meeting of Council, Members resolved that the NWDR would not be funded by development in the Green Belt. The inclusion of the concept of the NWDR in the local plan seeks to address the levels of increased congestion on Kingsditch Lane, Wymans Lane and Princess Elizabeth Way, improving quality of life for the residents living along these routes.</p> <p>The concept of the NWDR will be fully assessed through the local plan review process, including</p>

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		<p>the immediate and potential consequences are also matters of national concern recognised by both county and central government.</p> <p>We would urge the Council to take heed of the massive local opposition to the scheme, which coupled with county and central government policies spells 'overwhelming disapproval', and delete it from the Local Plan.</p> <p>It is our view that Council's efforts and finance would be far better directed towards reducing road traffic rather than facilitating it with a road which will simply encourage more traffic and, whatever Council may say now, lead to more development in the longer term both at greenbelt expense and against the general public interest.</p>	<p>investigations of the concept of a NWDR and possible route, and alternative strategies which could help mitigate against the impact of traffic in north west Cheltenham. These investigations will take into account a wide range of issues, including the environment, safety, economy, accessibility and integration.</p> <p><b>Local plan objective O32, O36</b>  <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept.</p>
166		<p>I am writing to express my opposition to the inclusion of the North Western Distributor Road in the Local Plan. This road cuts through designated Greenbelt land, that in itself should be sufficient to prevent it ever becoming reality. The proposal has already attracted almost total opposition from Swindon Village residents not just because of its location but because of its futility. It does not address local traffic issues in an effective way.</p> <p>Cheltenham Borough Council already has the results of the consultation document showing residents' overwhelming opposition to the scheme. Is this to be just another addition to the Cheltenham Borough list of ill-conceived ideas and planning blunders such as the St James site, Black &amp; White coach station, Cheltenham &amp; Hereford Brewery site, Lower Hight Street, Century Court, Millennium Restaurant, Noddy Train etc.</p> <p>The Council has a very poor track record in planning matters and should be fully aware of the pitfalls of this scheme to avoid making a further mistake. Please make that my objection is noted at all meetings where the North Western Distributor Road is discussed in the future.</p>	See ref. 151.
170		<p><b>Pitville Area Residents Association</b> NWDR is in direct conflict with Green Belt protection and other aims, including habitat and species protection, enhancement of the environment and maintenance of green open spaces. In planning terms the road is unsustainable. The rapid transport system from Bishops Cleeve via Cheltenham to Gloucester is the only true sustainable transport solution. Use of the existing Honeybourne Line would have minimal intrusion on the Green Belt. The</p>	See ref. 151.

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		<p>NWDR is a short term answer to a problem that will not be solved by building it. It will take traffic away from the centre, but will not reduce the amount of traffic or offer alternative forms of transport. The NWDR conflicts with the aims of the plan (para 5.9, 8.8 and 8.9) and the urban design study (para 4.1 and 2.4.4).</p>	
172		<p>Oppose plans for NWDR on Green Belt land. Such land by definition is irreplaceable. We do not believe that building new roads reduces traffic congestion. In the long run it appears to increase car use. The proposed distributor road would be likely to open up more Green Belt areas to new housing development in the longer term, resulting in a significant rise in car use. Every effort should be made to find ways of reducing the impact of traffic without resorting to use of Green Belt land. The provision of southbound access to Junction 10 of the M5 could prove to be a useful starting point.</p>	<p>See ref. 151.</p> <p>The transport studies being undertaken for the borough and county councils include an assessment of the impact of creating an all movements junction at J10 on the M5.</p>
190	5.32	<p><b>Vision 21</b> Cannot agree with proposal - sits ill with rest of strategy for Cheltenham. New roads mean more traffic not less. Inclusion of this concept as a possibility makes a mockery of much of rest of document. Building road cannot assist council to meet any of its targets for reducing car use, CO2 emissions, improving public transport, preventing unnecessary development or protecting environment. V21 urges council to drop this proposal.</p>	<p>See ref. 151.</p>
201		<p><b>Tewkesbury Borough Council</b> Object strongly to the concept of the North West Distributor Road given the absence of strategic highway justification for such a route, and the implications it will have on both existing communities within the Borough and future development options. Such a route should only proceed on the basis of its need being established through the Structure Plan/Local Transport Plan PRIOR to detailed corridors being identified within the local plans of both Cheltenham and Tewkesbury. Further details are required in relation to its implementation; if the route is to be built then substantial enabling development is both necessary to provide funding and inevitable. The Structure Plan Second Review (which provides the context for the Cheltenham Local Plan Second Review) is clear that Green Belt development is not appropriate. The Local Plan must not pre-empt the strategic debate as to future growth options in Gloucestershire which will be properly part of the Structure Plan Third Review to 2016.</p> <p>In summary, the North West Distributor Road concept is ill-conceived, has no technical</p>	<p>See ref. 151.</p>

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		justification, no means of implementation without associated major new development and will pre-empt the next round of structure and local plans. The proposal should be abandoned.	
210		<p>I wish to register my objection to the inclusion of the North West Distributor Road into the Cheltenham Local Plan. The road is unacceptable because:</p> <ul style="list-style-type: none"> <li>- it cuts through green belt land;</li> <li>- there is no statistical evidence to support the need</li> <li>- simple mathematics show that funding is only available if a large number of houses are built in green belt land.</li> </ul> <p>The extra housing would further load Wymans Lane and PE Way with extra traffic.</p>	see ref. 151.
212		<p>We are writing to object to the inclusion of the North Western Distributor Road in the Cheltenham Local Plan (specifically, the section from Newlands Cross to Tewkesbury Road). We have several grounds for doing so:</p> <ol style="list-style-type: none"> <li>1. The proposed route runs through Green Belt land. As we understand it, this should only be permitted in cases of exceptional need. We are not aware that any attempt has been made to prove the existence of any such exceptional need; indeed we are not aware of any published justification for this proposal using current traffic surveys or future forecasts.</li> <li>2. There is a risk that the proposed road will not solve such problems as do or will exist - traffic to and from the Kingsditch Lane area and the burgeoning retail developments along Tewkesbury Road may well continue to use Hyde Lane.</li> <li>3. The question of how the proposed road might be funded has not, as far as we know, been publicly addressed. There is great concern locally, which we share, that funding will come from the development of surrounding land for housing. Not only is this again unacceptable on Green Belt land, but also additional housing would aggravate the very traffic problems that the road is supposedly intended to solve.</li> <li>4. There are, or may be, specific concerns for residents of Brockhampton in the proposals (it is difficult to be definite given the lack of published details). Specifically, what arrangements would be made for access from Brockhampton Lane to the new road? Would it be possible (safely) to cross the new road and get to Swindon Village? What would be the environmental impact of the</li> </ol>	<p>See ref. 151..</p> <p>The transport studies being undertaken for the borough and county councils include an assessment of the impact of the road on the amenity of all highway users along the route.</p>



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		<p>road and any associated development?</p> <p>We are also more generally concerned at the way in which this proposal has been developed. It seems to have been developed in secret, and is being presented as a sole option. Surely it would be better to work jointly with local residents, the County Council, parish councils and Tewkesbury Borough Council to agree on the problems and develop a solution together. There are other ideas that should be considered - for example, enhancement of Junction 10 of the M5; road improvements in Wymans Lane and Kingsditch Lane; restriction of retail activity along Tewkesbury Road (a bit late now, but whose fault is that?).</p> <p>We would also remark that we are residents of Tewkesbury Borough who are nevertheless directly affected by this proposal, and that Cheltenham Borough Council seems to have made no attempt to keep us informed - eg we do not receive the 'Clarion'. We would be obliged if you would make more efforts in this direction in future. Will you please ensure that our opposition is noted in any summary documents and is brought to the attention of all committees debating the issue.</p>	
235		<p>I wish to register my objection to the proposed North Western Distributor Road on the following grounds:</p> <ol style="list-style-type: none"> <li>1. Road would be built on green belt land which, in my opinion, should be protected from all but socially and environmentally essential development. I believe this is still the policy for CBC, Glos CC and the Government.</li> <li>2. If built, road will inevitably lead to considerable infill development, both residential and industrial, creating increased pollution and congestion, rather than reducing congestion as stated.</li> </ol> <p>Would also like to voice concerns over way in which road appears to be being promoted, in particular:</p> <ol style="list-style-type: none"> <li>1. Manner in which public being consulted appears flawed. Majority of public have access only to information in Clarion. Transport Plan in general proposes laudable 'green' aims. Proposed road receives only brief mention and it is not disclosed that road will be routed through green belt or that its building will inevitably lead to building of potentially thousands of new houses.</li> </ol>	<p>See ref. 151.</p> <p>re Consultation item 1 - the adopted Transport Plan does make reference to the route of the NWDR passing through Green Belt.</p>

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		<p>2. Objecting views are being ignored by the Council. Any positive responses to draft transport plan as a whole are being taken as positive 'yes' vote for proposed road. To obtain true public opinion public consultation specifically about road required.</p>	
244		<p><b>Swindon Village Society</b> Register our strong and unanimous opposition to inclusion of NWDR in Local Plan. Primary objection is that it will impinge heavily on green belt between Cheltenham/Gloucester and Cheltenham/Bishops Cleeve. Maintenance of green belt essential to prevent urban sprawl, provide accesible open space for recreational benefit and provide habitat for wildlife and plants.</p> <p>Road as envisaged would disrupt several ancient rights of way, paths and minor roads, affect habitat of several birds already in decline and affect environment for residents of Swindon Village by creating additional noise and pollution.</p> <p>Proposal is contrary to a number of policies within Glos County Structure Plan:  Policy GB1 - green belt between Gloucester and Cheltenham and north of Cheltenham will be maintained and is in accordance with RPG which supports green belt policy.  Policy S6 - local character should be safeguarded and enhanced.  Policy T13 - strategic county road schemes which are to be given consideration during period under review and which does not include a NW distributor road.  Policy NHE3 - indicates that best agricultural land will be preserved where possible.  Policy NHE6 - distinctive historic environment of county is to be conserved and enhanced.  Policy P1 - provision will only be made for new development where it does not have an unacceptable effect on the local community in terms of air, light or noise pollution.</p> <p>Reason for provision of road primarily based on relief of current Hyde Lane, Wymans Lane, Kingsditch rout. Society in favour of providing such relief but does not believe road will provide solution. This opinion is supported by analysis that caused road to be deleted from County Structure Plan some years ago.</p> <p>Society concerned that bypass will create additional traffic in area, particularly heavy traffic. Best answer to how to improve current route should include consideration of vehicle weight limits, reduced and enforced</p>	<p>See ref. 151.  These points are being assessed in the North West Cheltenham transport and planning studies which are being undertaken for the borough and county council. These reports will inform the local plan review.</p>

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		<p>speed limits in built up area, traffic calming measures, signposting to divert traffic and better public transport. Emphasis should not be on encouraging use of vehicles but on placing sensible restraints upon their use.</p> <p>Has not been stated how road will be funded (other than it will not be by residential development). But little doubt that it will attract development, both residential and industrial, which will attract additional traffic to area. If money available, would be better used improving current infrastructure.</p>	
271		<p>I wish to object to the proposal to incorporate the NWDR in the Local Plan on the following grounds:</p> <ol style="list-style-type: none"> <li>1. Report by consultants Halcrow (North West Cheltenham Traffic Study March 2000) indicated that a significant proportion of traffic movements in North West Cheltenham were local. It concluded that a local solution should be provided to the traffic problems. In light of this report, the Council should be investigating a local solution to the traffic problems rather than putting forward the expensive and environmentally destructive alternative of a distributor road.</li> <li>2. The Halcrow work indicated that a bypass alternative performed poorly in terms of traffic and economic assessments.</li> <li>3. The Highways Agency have indicated that they will be assessing the desirability of converting M5 Jn 10 into an all movements layout during 2002/3. The conversion of this junction would remove some of the long distance traffic from PE Way.</li> <li>4. The road would be built in the green belt and there are understandable concerns that it would be funded through building up to 5000 houses in the green belt. The borough council resolved that it would not be funded by development but through government funding. However, the recent government paper 'Transport 2010' provides no evidence that they are any more receptive to financial road building than before. Whilst the Borough Council has claimed that government funding might be available after 2010 there is no evidence for this.</li> </ol> <p>In conclusion, I consider the proposed NWDR unsustainable in terms of environmental, traffic management and economic grounds. Instead the borough council should be actively pursuing an alternative strategy to deal with traffic problems in north west Cheltenham based on:</p> <ol style="list-style-type: none"> <li>1. Introducing local traffic management</li> </ol>	<p>The borough council is currently pursuing the 'alternative strategy' suggested.</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		<p>measures to deal with traffic problems in north west Cheltenham (as recommended by Halcrow)</p> <p>2. Continuing to press the Highways Agency to open up M5 Jn 10 to an all movements layout.</p> <p>3. Investing in public transport in north west Cheltenham, including investigating bus links to Coronation Square, Cheltenham General Hospital, Kingsditch and Swindon Village.</p> <p>4. Implementing planning requirements for new employment locations (such as GCHQ and GLOSCAT) to provide public transport schemes to get their staff to work.</p>	
278		<p>Would like to register strong opposition to inclusion of this road in the local plan. Scheme has already attracted overwhelming opposition. Loss of this important greenbelt land is totally unacceptable. It is inconceivable that development would not take place in the greenbelt area surrounding the road leading to greater traffic problems than those it is supposedly aimed to cure.</p> <p>Objections are in accordance with Gloucestershire County Council's Structure Plan, from which the road was removed. Also object on the basis that there are alternatives available for consideration. These are:</p> <ul style="list-style-type: none"> <li>• upgrading of M5 junction 10;</li> <li>• improvements to A38, A4019 and Stoke Orchard Road;</li> <li>• modifications to, or removal of, old railway bridges in Tewkesbury Road/Lower High St and St Paul's Road;</li> <li>• improvements to Princess Elizabeth Way;</li> <li>• Improvements to Kingsditch Lane;</li> <li>• improvements to Swindon Road bridge;</li> <li>• provision of new link road between Tommy Taylor's Lane and Evesham Road;</li> <li>• improvements to Wyman's Lane;</li> <li>• new roundabout in Hyde Lane and link road to Swindon Lane.</li> </ul> <p>Therefore ask that consideration of construction of road be deleted immediately from local plan. Council will not be able to justify road at a public inquiry so should address its efforts to investigating more useful solutions [see original letter for details]. Deplorable that Council has thus far chosen to ignore results of its own consultation on this issue.</p>	See ref. 151.
283	5.32	<p><b>Cheltenham Friends of the Earth</b> Object to safeguarding of NWDR route. Transport strategy said that concept of road would be examined as part of local plan process, but</p>	See ref. 151.

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		local plan has not done this, instead it appears to have accepted that since road proposal in transport strategy then it will be included as a fait a compli in local plan.	
292		<p><b>Gloucestershire County Council</b> Policy PR3 Land safeguarded for transport schemes</p> <p>1. County Council objects to the inclusion of the North West Distributor Road in Policy PR3.</p> <p>2. In Policy PR3 the County Council supports the adopted Local Plan in respect of the Tatchley Lane Link until such time as a Transport Assessment and Environment Assessment of the development suggests an alternative course - either an alternative route through the development site or no through road link at all.</p> <p>PR3 (a): NWDR is through greenbelt which in itself prevents any development from prejudicing implementation of scheme because development contrary to current greenbelt policy.</p> <p>PR3(b): this must be the established line as protected in present local plan until such time as proposal can be reviewed.</p> <p>PR3(c): this scheme would encourage short cutting and more car usage for local journeys. When it is known how site might be developed it would then be necessary to address accessing site.</p>	<p>See ref. 151, and Key Issues response dealing with Starvehall Farm and the Tatchley Lane link.</p> <p>PR3(c) Outer West Development Brief road - the council supports the opportunity for the redevelopment of this site to benefit the wider transport network, particularly that part of the town's ring road which includes Gloucester Road and its junction with Tewkesbury Road. Through careful design it would be feasible to target improvements primarily to benefit non-car modes. More efficient operation of the Tewkesbury Road/Gloucester Road junction would increase the attractiveness of the town centre ring road, enabling traffic levels in the town centre to be reduced, bus priority to be maximised, pedestrianisation extended and residential streets protected from through traffic.</p>
295		<p><b>Swindon Parish Council</b> (see also comments submitted in response to Transport Plan 2001). Unanimous view of Swindon PC that the Plan is totally town centre orientated, with proposals which will benefit the centre at the expense of rural areas.</p> <p>A wider look should be taken, with County, Regional and National concerns, to arrive at a transport solution to the North/South traffic problems. Squeezing a road within the Borough boundary, over green belt land and with in-fill housing will exacerbate local road problems. The Parish Council will oppose any changes to the Local Plan which attempts to introduce a major highway scheme.</p> <p>North West Distributor Road (NWDR) cannot be described as a concept when part of it is already complete, by GCHQ Benhall. Need details of methodology survey data used to demonstrate the need for NWDR. Congestion problems on Tewkesbury Road/PE Way/Kingsditch Lane only occur during peak times and in school term times. The main problem outside peak hours is with traffic using junction 11 of the M5.</p>	See ref. 151.

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		<p>Provide evidence that school generated traffic would not continue to use local roads following completion of a NWDR. There will be an insignificant benefit to Princess Elizabeth Way traffic flow as a result of constructing the NWDR in the location indicated. Upgrading junction 10 of the M5 will produce greater benefit., together with a tidal 3 lane system on Princess Elizabeth Way to address peak congestion. Existing bus lay-bys add hold up traffic and lead to greater pollution.</p> <p>Agree that further development pressures in north west Cheltenham and in Tewkesbury borough may add to traffic problems there is also little evidence to support the case that the NWDR will counter this. Cheltenham Borough Council should not attempt to solve the problems on its own. If Tewkesbury Borough Council does not deal with the problem it will continue to grow.</p> <p>The proximity of the NWDR junction with Hyde Lane will reduce the road's effectiveness because existing traffic routes will be maintained. The NWDR should join the A435 to the north of Bishops Cleeve, to reduce traffic through Bishops Cleeve, Swindon and on the Evesham Road into Cheltenham. As the Highways Agency is considering upgrading access to Junction 10, M5, it would be premature, economically unwise and potentially disastrous to address the NWDR at this stage. The concept should be removed from the Plan.</p> <p>Proposed road would have a devastating effect on community of Swindon, destroying its character, farms and green belt. Moving pollution from town to rural areas and turning rural communities into a Park and Ride facility linked by road is unacceptable. It ignores wishes and needs of residents to benefit those who only come to work and shop.</p> <p>Need to study short and long term effects of the road on the environment and communities served, dissected and bounded by it. Will the road really benefit the community and reduce traffic?</p> <p>NWDR will encourage further out of town development as shops move out and will 'enhance' the town centre's reputation for drunkenness and violence.</p> <p>A full survey of the interests and needs of the rural communities must be identified and the</p>	

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		<p>Council must give them equal commitment to that which it gives to the town.</p> <p>The benefits to Cheltenham of maintaining the green belt considerably outweigh those that would be derived for a few from the proposed roads and park and ride schemes. Government policy requires that the green belt is reinforced and maintained. Policies CO48 &amp; CO49 of the CBC adopted Local Plan state a presumption against new buildings and offer protection of the best agricultural land.</p> <p>Without Gloucestershire County Council's support the road could only be funded by the Borough or developers. GCC may not wish to maintain it. It is not acceptable that these proposals are included without any survey of communities, proper consultation or impact study being undertaken.</p> <p>At least three farms would be dissected, which may lead to them becoming unviable, and to smaller fields being sold off to developers. Is this a covert council policy behind the road concept?</p>	
304		<p>To establish need for new road requires knowledge of all traffic that will be affected by route and also of the people, towns and villages that it will affect, and to provide prediction of short and long-term effects of building the road. Will it really benefit the community and reduce traffic on existing routes, or will it provide an excuse for expansion of existing developments and in-filling. Apparent that strategy of plan is about improving environment and reducing parking and traffic problems in the <i>town</i> and that outlying areas of Cheltenham will have to suffer to benefit the <i>town</i>. From the information available, not possible to provide an accurate route for the road, but important to know where the route joins Hyde Lane, as traffic will always take shortest route. Wymans Lane may or may not benefit from the new road - survey required. Alternatives to new road should be investigated. Believe upgrading M5 junction 10 to allow full access would alleviate traffic. Alleviation of traffic through new road will be lost as soon as new development commences. Detailed costings for project and subsequent maintenance required. Will result in loss of green belt and make affected farms unviable. Many other questions remain to be answered. [Extremely detailed comments submitted on potential route and its effects.]</p>	See ref. 151.
<b>PR3 North West Distributor Road - support</b>			
61		We urgently need the North Western	Comments noted.

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		Distributor Road.	<b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept
98		<p>I was worried about the north west ring road, but am relieved to hear that it will not be funded by development on the Green Belt. Brownfield sites should be used first before destroying more of the very beautiful countryside that surrounds the town. As a cyclist I welcome any venture that promotes the safety of cyclist and reduces traffic. I hope that this road will reduce the Kingsditch traffic volume.</p> <p><i>Response included comments which cannot be dealt with in the remit of the local plan. For details please see schedule report 'other comments'.</i></p>	See ref. 61.
119		<p><b>Prowting Projects</b> Objection based on no tangible funding or phasing arrangement for the north-west Distributor Road. We fully support the council's concept for a north-west distributor road. However, if there is to be a real chance of implementation there cannot be reliance on public funding for the project. Instead the council should consider an 'enabling package' in which the road will be constructed, possibly on a phased basis through housing and/or mixed use development on neighbouring land.</p>	<p>At a meeting of Council on 2 July 2001, Members resolved that the North West Distributor Road will not be funded by development in the Green Belt.</p> <p><b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept</p>
153		<p>North Western Distributor Road: as the above road is still under debate, I am writing once again to register my support FOR the road. At long last Cheltenham Borough Council are doing something about the volume of traffic on this side of town, and I wish them every success. Also, I hope that only objectors with a borough address will be registered AGAINST the new road no matter how many hundreds/thousands of names are presented to the Borough Council, and that steps are taken to prove their authenticity, if that is at all possible. If we believe the objectors, the country and his brother are against the new road round Swindon Village.</p>	<p>Comments noted.</p> <p><b>Local plan objective O32, O36</b> <b>Recommend</b> consider findings of reports which will consider transport case and planning considerations of NWDR concept</p>
163		<p>I would like to take this opportunity to register my support for the North Western Distributor Road. So much has been said about the possible loss of greenbelt land, which nobody likes to see disappear, however little has been said about the possible outcome if this project fails to go ahead. Industry and commerce require a good transport infrastructure to be successful. Fail with this basic need and existing businesses will be forced to relocate and potential new ones will not even consider our fair town. Secondly, failure to provide adequate housing will force the potential labour force to also relocate,</p>	Comments noted.



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		thus once again having a negative effect on Cheltenham as a thriving industrial, commercial and shopping town. I feel the stance the Council is taking on this proposal indicates first class forward thinking and I wish you well.	
173		Support NWDR. Wymans Lane has experienced a growth in traffic flows, particularly heavy vehicles. Traffic fumes are a problem, to avoid further problems the road is essential.	Comments noted.
174		Support development of NWDR to reduce the amount of traffic along Hyde Lane and Wymans Lane. A large proportion of this traffic consists of large multi-axled trucks which are unsuitable for narrow lanes.  Doing nothing is not an option. The various authorities should reach an acceptable compromise.	Comments noted.
175		Support NWDR. When GCHQ is operating the problems will get worse.	Comments noted.
176		Support NWDR.	Comments noted.
177		Support NWDR. Something must be done to stop the ever increasing volume of traffic that uses Wymans Lane/Hyde Lane which makes life unbearable for residents.	Comments noted.
178		Support NWDR. Action must be taken before someone is injured, killed and total grid lock occurs. Wymans Lane was not designed to carry this amount of traffic. The Lane is in poor condition, drainage is poor, the pavements are too narrow, and pedestrians get soaked in the rain. The lighting is poor.  During peak times the flow of traffic crawls along. Congestion builds up to Hyde Lane, Swindon Lane, Swindon Road, Windyridge Road and Runnings Road into Manor Road. The increased train traffic causes the barriers at Morris Hill to be down for long periods.	Comments noted.
179		Support NWDR. The constant noise of lorries and traffic precludes sleep at the front of the house. There is congestion at rush hour, and traffic tails back when the level crossing gates close on Swindon Lane.  Hyde Lane, Wymans Lane and Princess Elizabeth Way are the 'bypass' on this side of town, feeding both the M5 junction and out of town shopping centres.  Travellers on A.452/A.46 can by pass Leamington, Warwick, Stratford, Evesham and Bishops Cleeve, and then have to traverse Cheltenham with all its hold ups. Cheltenham needs a bypass ASAP.	Comments noted.
184		I wish to express my support for the proposed North-Western bypass road which will ease	Comments noted.

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		traffic congestion in the western half of the town.	
185		I wish to express my support for the proposed North Western bypass road which will ease traffic congestion in the western half of the town.	Comments noted.
186		I wish to express my support for the proposed North Western bypass road which will ease traffic congestion in the western half of the town.	Comments noted.
196		I wish to express my support for the proposed North-Western bypass road which will ease traffic congestion in the western half of the town.	Comments noted.
246		North Western Distributor Road: I enclose a cutting from the Village News [re 2001 letters of objection handed to Mayor in October] - you will note that 70% of objections came from people who do not live in the village - one of the reasons for this is that the people organising the objection went into Cheltenham and canvassed passers by. There is no thought at all for us residents who live off Wyman's Lane. The traffic has increased tremendously. Everybody is complaining about it. I do hope some of our views will be taken into consideration. It is disgraceful that Cheltenham has not got a bypass - we pay our rates just as the people in the village do and we have none of the benefits. What it will be like when the buildings opposite McDonalds are up and running heaven only knows.	Comments noted.
258		<p><b>Cheltenham Chamber of Commerce, Transport Section</b></p> <p>I write to confirm the strong support of Cheltenham Chamber of Commerce, and my own personal support, for the North West Distributor Road. No. of reasons why road necessary:</p> <ol style="list-style-type: none"> <li>1. PE Way is busiest unclassified road in County, built to serve housing estate not as link road.</li> <li>2. Area including Kingsditch and Hyde Lane severely congested for long periods with rat runs through Swindon Village and Windyridge Road. This will be exacerbated by GCHQ and Gloscat developments.</li> <li>3. Operational hours of above developments mean staff buses are inappropriate and public transport will not work.</li> </ol> <p>No sensible alternative to the NWDR has been put forward. Our view is that there is no alternative which would benefit the borough to the same extent. Road would have massive impact by relieving town centre congestion at all times, and particularly during peak periods.</p>	Comments noted.

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		<p>Proposed road will carry traffic right around the town from Shurdington Road, via Arle Court to Bishops Cleeve, giving much needed motorway access and take pressure off Gloucester Road and Northern Relief Road. Our view is that Ring Road will not be able to carry volume of traffic anticipated on St James/Jessop Avenue unless it is supported by completion of the NWDR.</p> <p>Cheltenham has always had a raw deal from both Government and the County Council over funding for roads. The County benefits from 76% of our council taxes, but Cheltenham appears to get very little in return when it comes to roads.</p> <p>The Cheltenham Chamber of Commerce realises that the car is the most popular form of transport and fully support the proposal to construct the North West Distributor Road.</p>	
272		<p>North west distributor road controversial but, with 'outer west' road, will provide a valuable new link from Bishops Cleeve and Swindon Village to large new employment and educational buildings at Benhall. Although I do not in general approve of bypasses I think this is an exceptional case. In addition, this distributor road will in future probably provide access to a certain amount of additional housing on north west periphery of Cheltenham (its greenbelt status will probably be removed in forthcoming revision to structure plan. Road may also provide relief from future housing pressure on Leckhampton green land, which is also welcome.</p>	Comments noted.
276	5.32	<p><b>David Wilson Estates</b> Support objectives defined in respect of safeguarding a route for future construction of north west distributor road. This would allow for development of sites such as land at Home Farm to come forward [location plan enclosed with comments]. This site would make a sustainable contribution to meeting housing needs within Borough post 2011 [location plan enclosed with comments].</p>	Comments noted.
281		<p><b>Up Hatherley Parish Council</b> Policy PR3 paras (a) and (c). Support council's initiatives regarding identification of a route linking A40 to A435. Clearly a need for a bypass and council is right to safeguard corridor of opportunity. Whilst on this point, it may be sensible for council to bear in mind sites, now, which may accommodate future development needs.</p>	Comments noted.
286	5.32 & PR3 (a)	<p><b>Robert Hitchins Ltd.</b> Support safeguarding of route for future construction of distributor road on north western side of town.</p>	Comments noted.

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291	5.32	<p><b>Leckhampton Green Land Action Group</b> Support intention to safeguard a route for future construction. If further expansion of town is to occur beyond 2011, only direction it can take on any scale and with least detrimental effect on scenic enclosure and approaches of town is to north west. Proposal: consideration should be given to inclusion of this argument in justification for the scheme.</p>	Comments noted.
305		<p>Cheltenham has two town centres, the second one being Kingsditch. This needs to be acknowledged so that relevant policies and strategies can be provided, eg transport infrastructure to accommodate circular (ie bypass) access from all the outer suburbs. In longer term Cheltenham can only expand significantly towards north west, ie enclosing Kingsditch as its 'service centre'. Upgrading M5 junction 10 would be poor alternative to Hesters Way section of bypass because major Gloucester-Bishops Cleeve traffic flows cannot be fed through Stoke Orchard and will therefore still have to pass through Swindon/Kingsditch. Road will therefore be inevitable, so include some robust longer-term reasoning to support the concept. Building road will also enable greenfield sites which contribute significantly to town's setting and amenity (eg Leckhampton White Land) to be permanently released from their present threat. Inside a conurbation, best way to limit congestion is to not intensify land use, thus development off to northwest of Kingsditch would be much less congesting than siting those residential traffic-generators along Shurdington Road-Bath Road bottleneck, which is not only overloaded as a radial route, but has no prospect of enhanced circular route (like NWDR) to assist it.</p>	Comments noted.
<b>Starvehall Farm - objections</b>			
85		<p>I am writing to express my concern at the proposed housing development of Starvehall Farm. I believe that this will have a detrimental effect on the environment of those living in the vicinity, both during the time of construction and also in terms of increased traffic and noise afterwards. I appreciate that some of the traffic problem will be offset by the proposed new road, but not all will be. The road will be used as a cut through for north bound traffic from the east and the south, and not just as an improvement to the roundabouts in Prestbury.</p> <p>I do not feel that Starvehall Farm is the best place for housing as the whole character of New Barn Lane, Prestbury Road and</p>	<p>Land at Starvehall Farm is allocated in the local plan review for residential development to accommodate a shortfall in housing, identified by the Urban Capacity Study, which cannot be accommodated on brownfield sites within the town.</p> <p>Starvehall Farm is well located for residential development: being close to existing residential development, local amenities, schools and public transport services it could contribute to their vitality, supporting the local community and minimising car dependency and use. With access to public transport services into the town centre and beyond, and pedestrian and cycle routes nearby, there would be more opportunities for people to travel in a sustainable way. Hence the allocation of land at Starvehall Farm complies with the provisions of RPG10, PPG3 and PPG13 - these set out the</p>

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		<p>Cleevemount areas would change. When we moved here four years ago, a major contributory factor in our choice of area was the feeling of being both in the town, and in the countryside. More consideration should be given to the ongoing use of the site for farming purposes.</p>	<p>Government's commitment to sustainable development and the best use of land.</p> <p>The adopted local plan safeguards land for the construction of a new link road between Prestbury Road and New Barn Lane (the Tatchley Lane link), as an alternative to the substandard junction of Deep Street, Prestbury Road and Bouncers Lane. The Tatchley Lane link is also referred to in the Gloucestershire Local Transport Plan and was to be developer funded. However, the development of Starvehall Farm offers the opportunity of an alternative route through Starvehall Farm.</p> <p>The review of the local plan will consider the need for a link between New Barn Lane and Prestbury Road and, if justified, the most appropriate route. The assessment will include sustainability and economic considerations, the safety of all highway users, environmental impact and potential impact upon existing properties and the surrounding area.</p> <p><b>Local plan objective O5, O6, O13, O22, O32, O35, O36</b></p> <p><b>Recommend</b> the Council consider the need for a link between New Barn Lane and Prestbury Road and, if justified, the most appropriate route to be safeguarded in the plan and implemented in conjunction with the development of Starvehall Farm.</p>
92		<p>While I feel that the proposed residential developments on pre-used commercial sites are to be applauded, the idea that you should cover a green field site at Starvehall Farm with concrete and tarmac is nothing short of vandalism.</p>	<p>See response to ref. 85.</p>
187		<p>We object very strongly to the inclusion in the Cheltenham Borough Local Plan, without any prior public consultation, of a Local Transport Plan showing a through road between New Barn Lane and Prestbury Road via Starvehall Farm, apparently replacing the Tatchley Lane Link which was included in earlier versions of the plan after due consultation.</p> <p>The implications of the proposed road in terms of traffic volumes, taking into account other proposed road developments such as the North West Distributor Road, are potentially horrifying and should have been subjected to full public scrutiny, which might well have resulted in the proposal being quashed. The lack of proper consultation may indeed amount to maladministration, which would be a matter for the Ombudsman.</p> <p>We understand that in earlier versions of the Starvehall Farm development proposals there were to be separate vehicular accesses from Prestbury Road and New Barn Lane but these accesses were not to be joined to</p>	<p>See response to ref. 85.</p>

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		<p>create a through road except perhaps for cyclists. A major objection to the scheme would be removed if the development reverted to separate access without a through 'rat run' for vehicles.</p> <p>We ask that the proposed development at Starvehall Farm be made the subject of a proper consultation exercise, with details made available in public libraries etc and officers present to explain the proposals, and with forms provided for individuals to record their comments.</p> <p>Would you kindly ensure that other departments of the Borough Council which have an interest in this matter are given the opportunity to see this letter. We are taking this matter up with the County Council also.</p>	
191		<p>I wish to register my very strong objection to the road proposed as an alternative to the Tatchley Lane Link Road which would connect New Barn lane and Prestbury Road through Starvehall Farm and the Prestbury Road rugby field. My objection is based on the following:</p> <ol style="list-style-type: none"> <li>1. The road will provide a through route for traffic wishing to transit between the A40 London Road and the A435 Evesham Road.</li> <li>2. The increase in traffic volume will be significantly greater than the current levels.</li> <li>3. Resultant pollution and noise will degrade my quality of life.</li> <li>4. The nature of Prestbury as a village will be destroyed.</li> <li>5. Safety and ease of access for pedestrians and cyclists will be compromised.</li> <li>6. Safe access to my property will become even more difficult than at present.</li> <li>7. Reduction in property values - for which compensation will be sought.</li> </ol> <p>I would therefore request that a full public consultation is undertaken on this proposed Link Road.</p> <p>Would it be easier to increase the speed limit on New Barn Lane rather than decrease it?</p>	See response to ref. 85.
195		<p>I have heard that the proposed [Prestbury Road/New Barn Lane] Link Road could be built close to the Prestbury Road Day Centre. If, as this suggests, the entrance and/or exist is as near I am concerned for the disabled people who sue the Centre. As you will know the Centre was designed to afford relaxation, which indeed it does. Weather permitting the garden can be enjoyed, also the rear patio which faces onto the playing field, but this would be cancelled out by noise and pollution.</p>	See response to ref. 85.

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		<p>To deny full enjoyment of this special day centre is, I am sure, not the intention of anyone concerned with the planning, but I wonder if the point I make has been fully discussed so I take this opportunity to write to you.</p>	
197		<p>Proposed connection road from Prestbury Road and New Barn Lane: we are strongly against this new road and we do not think that any though has gone into the plans regarding the race traffic. With the extra traffic that will use the bypass plus the race traffic, tempers will be frayed not only by the rac-goes but the tradesmen that will be held up throught the day. We have racing 17 days of the year and the cars are bumper to bumper in New Barn Lane, both going to the racecourse and returning home in the afternoon. That doesnt' include other events throughout the year, ie Greenbelt.</p> <p>What about the school children who cross the road to catch their bus or to return to their homes?  What about the elderly who catch the town bus outside our house? How will they be expected to cross through the traffic?  What about the students who are in residence at the colleage and cross the road daily to go to the shop? They will have to doge the traffic and take thie lives in their hands so not to be late for their lectures.  Within six months of the new road opening there will be a serious accident and possibly a death. Is this what you and your planners want?  Please stop it now before any further plans are put forward and give everyone a normal life.</p> <p>I understand that the plans are to take traffic away from Tatchley Lane roundabout (known as the weighbridg), surely, when GCHQ move from Oakley to Benhall, the traffic will be reduced naturally.</p> <p>We hear that the junior school in Prestbury is bursting at the seams. With more houses being built, more children will need the school, why then, do you not build another infant and junior school for Prestbury on the field by Prestbury Road, known as the rugby field, which could include a drive in for parents. The children could then go into school and be picked up safely. Next to this "school" is a lovely playing field just right for their games. The old school could then be sold off to help pay the cost.</p>	See response to ref. 85.

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		Should you ignore everyone and go ahead with the bypass, we will then expect to receive compensation for the reduction of our property.	
198		<p>We wish to register our very strong objections to the proposed link road between New Barn Lane and Prestbury Road. Our objections are based on the following:</p> <ol style="list-style-type: none"> <li>1. The proposals are said to be to help with the traffic congestion in Prestbury, but a large new road may have the opposite effect and even encourage more heavier vehicles through the village than at present. The rat run already experienced by The Burgage and Mill Street will merely be replaced by a similar run through the centre of the village.</li> <li>2. Properties on the Prestbury Road would be downgraded by the creation of traffic congestion, continual noise and pollution.</li> <li>3. Noise and pollution will greatly affect some of the quiet areas directly off the Prestbury Road.</li> <li>4. Access onto the Prestbury Road from Coronation Road would be practically impossible.</li> <li>5. Safe access to our property will become more difficult than at present.</li> <li>6. Safety for pedestrians (school children in particular) and cyclists.</li> <li>7. Proposed new road and housing will take away yet another playing field, which I believe we are desperately short of.</li> <li>8. Destroying our village atmosphere.</li> <li>9. Reduction in property values.</li> </ol> <p>We would therefore request that a full public consultation is undertaken on this proposed Link Road.</p>	See response to ref. 85.
199		<p><b>Standard Letter (14 Submitted)</b></p> <p>I wish to register my very strong objection to the road proposed as an alternative to the Tatchley Lane Link Road which would connect New Barn Lane and Prestbury Road through Starvhall Farm and the Prestbury Road rugby field. My objection is based on the following:</p> <ol style="list-style-type: none"> <li>1. The road will provide a through route for traffic wishing to transit between the A40 London Road and the A435 Evesham Road.</li> <li>2. The increase in traffic volume will be significantly greater than the current levels.</li> <li>3. Resultant pollution and noise will degrade my quality of life.</li> <li>4. The nature of Prestbury as a village will be destroyed.</li> <li>5. Safety and ease of access for pedestrians and cyclists will be compromised.</li> <li>6. Safe access to my property will become</li> </ol>	See response to ref. 85.



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		<p>even more difficult than at present.</p> <p>7. Reduction in property values - for which compensation will be sought.</p> <p>I would therefore request that a full public consultation is undertaken on this proposed Link road.</p>	
200		<p>Proposed alternative Tatchley Lane link: we wish to register our objections to the road proposed re Starvehall Farm and Prestbury Road rugby field:</p> <ol style="list-style-type: none"> <li>1. The road will become a fast route for traffic wishing to go A40 London Road and A435 Evesham Road.</li> <li>2. The flow of traffic will be considerably increased.</li> <li>3. Prestbury as a village will be destroyed.</li> <li>4. Safety for pedestrians, cyclists and car owners will be more difficult, we already have difficulty driving, ie trying to get our car in and out of our driveway.</li> <li>5. The traffic volume will be greatly increased with more pollution and noise which is bad enough already.</li> <li>6. Reduction of property values.</li> </ol> <p>As I write this letter water is cascading down our drive from the road, which the Council has never done anything about. With more housing proposed, what is going to happen to the properties already in the area?</p> <p>We wish to have a full public consultation on this proposal.</p>	See response to ref. 85.
202		<p>I would like to register my very strong objection to the proposed road through Starvehall Farm to act as an alternative Link Road.</p> <p>Firstly, on the grounds of increase traffic volume and subsequent noise and pollution where I live and in general.</p> <p>Secondly, on the probability that my property will lose considerable value, in which case I would seek compensation.</p> <p>Thirdly, in the belief that the road is being classified as a relief road whereas in practice it is really required by builders to provide access to the estate of new houses that are proposed after the present tenants of the farm vacate the premises early next year.</p> <p>This would cause an enormous increase in volume of traffic past my drive, and would in addition almost certainly block my clear and beautiful view to Cleeve Hill.</p> <p>I was completely unable to get any information on this development at your</p>	See response to ref. 85.

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		offices recently and would therefore request that a full public consultation is undertaken on this proposed Link Road.	
203		<p>I write to register our very strong objection to the alternative proposal to the Tatchley Lane Link Road, a proposal that appears to have slipped into Council planning with very little information being made available to local residents. Our objection is based on the following:</p> <ol style="list-style-type: none"> <li>1. The road will provide a through route for traffic wishing to travel between the A40 London Road and the A435 Evesham Road which will result in a hugely increased volume of traffic in the area than at present.</li> <li>2. The resultant noise and pollution will significantly affect our quality of life.</li> <li>3. The nature of Prestbury as a village will be destroyed.</li> <li>4. Safety and ease of access for pedestrians and cyclists will be compromised.</li> <li>5. Safe access to our property will become even more difficult than at present.</li> <li>6. New Barn Lane already suffers from flooding during wet weather and increased traffic on the road can only make this worse with potential damage to property.</li> <li>7. There is likely to be a reduction in property values for which full compensation will be sought.</li> </ol> <p>We therefore request most strongly that a full public consultation is undertaken on this proposed link road.</p>	See response to ref. 85.
204		As residents of [-----] we are concerned about the plans for the proposed link road and development on Starvehall Farm. As our lane is now very congested with traffic and it is difficult to get in and out of our drives especially on race days, we would welcome any move to alleviate this problem. Could we please be informed of any future meetings on this subject.	See response to ref. 85.
205		<p>I strongly object to the proposed new route involving New Barn Lane and Prestbury Road. It was thought that it was the aim of the council to reduce traffic through the town and thereby reduce congestion-related healthcare issues. More traffic on Prestbury Road would result in a greater number of road traffic accidents in this area and congestion associated respiratory problems.</p> <p>In addition the loss of yet another green area in an already highly urbanised town would be to the detriment of its inhabitants. Sport and areas devoid of buildings are both proven to be beneficial to one's health.</p>	See response to ref. 85.
206		I wish to register the strongest possible	See response to ref. 85.

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		<p>objection to the proposed link road connecting New Barn Lane and Prestbury Road, which the council have included in their Draft Transport Plan. Not only was this done after little or no dialogue with local residents or parish councillors, but flies in the face of common sense and generally accepted practice in the development of new housing.</p> <p>That the Starvehall Farm land is to be developed for housing is not the issue; local residents have been aware of this for many years. However, to push a major road straight through the development will inevitably lead to:</p> <ol style="list-style-type: none"> <li>1. An increase, rather than any decrease, in traffic problems in the Prestbury and Pittville areas. It is surely an 'open secret' that this effectively creates a 'North East Distributor Road' linking the A435 (Evesham Road) to the A40 (London Road). Such a road will attract more traffic, not improve traffic flow; neither will the roundabouts at either end.</li> <li>2. Increased danger to pedestrians, including schoolchildren. The plans suggest a road at least as wide as New Barn Lane, with the attendant size and potential speed of vehicles.</li> <li>3. Increased pollution, both physical and noise.</li> </ol> <p>Surely it would be better to develop the site by creating two estates, one with access from New Barn Lane and the other from Prestbury Road, with at least a little green space between them. Then only residents and vehicles servicing the estates need access them; one road in and the same road out, with appropriate traffic calming measures within. This is effective in many other places, so why create unnecessary problems here?</p> <p>There really must be full public consultation on this issue. I doubt you will find many local residents in favour of it.</p>	
207		<p><b>[Petition: 31 signatures]</b> I wish to register my very strong objection to the road proposed as an alternative to the Tatchley Lane Link Road, which would connect New Barn Lane and Prestbury Road through Starvehall Farm and the Prestbury Road rugby field. My objection is based on the following:</p> <ol style="list-style-type: none"> <li>1. The road will provide a through route for traffic wishing to transit between the A40 London Road and the A435 Evesham Road.</li> <li>2. The increase in traffic volume will be significantly greater than the current levels.</li> </ol>	See response to ref. 85.

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		<p>3. Resultant noise and pollution will degrade my quality of life.</p> <p>3. The nature of Prestbury as a village will be destroyed.</p> <p>4. Safety and ease of access for pedestrians and cyclists will be compromised.</p> <p>5. Safe access to my property will become even more difficult than at present.</p> <p>6. Reduction in property values for which compensation will be sought.</p> <p>I would therefore request that a full public consultation is undertaken on this proposed link road.</p>	
208		<p>I am writing to register my strong objection to the proposed alternative Tatchley Lane Link Road connecting New Barn Lane to Prestbury Road, which will take the new road through Starvehall Farm and Prestbury rugby field.</p> <p>I object as a resident based on my understanding that it will be providing a through traffic to all transit from A40 to the A435 which will bring with it increased volumes and noise and pollution to this area which in my opinion will spoil the quality of life in the area.</p> <p>I placed my house on the market in May, just before the Echo alerted the residents to this proposed route. I can therefore speak from first hand experience as to how this will affect the area and the house prices, with me already having difficulty selling my property on the basis that buyers do not want to live in New Barn lane if this goes through. I have also had to reduce my house price by £10,000 to see if I can attract potential buyers.</p> <p>New Barn Lane was already a busy road when I moved here 9 years ago but the levels although high do not include many yeavy transit as it did then, and this I recall was after much consultation by our council representatives, so why now do you feel it necessary to bring the traffic back and develop the Starvehall site which will eventually spoil the nature the village of Prestbury?</p> <p>I have enjoyed living in this area and the reputation it has and if I only had a bigger garden would not be looking to move now, but IF this went ahead I will be glad I did.</p> <p>You must therefore ensure a full public consultation is undertaken before this progresses.</p>	See response to ref. 85.

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209		<p>My partner and I would like to register our objections to the proposed alternative Tatchley Lane Link Road which as I understand would connect New Barn Lane and Prestbury Road by way of a link road through Starvehall Farm and the Prestbury Road rugby field.</p> <p>We are a fairly young couple and are just starting a new family in our recently purchased address in New Barn Lane. We are strongly concerned with the following issues:</p> <ol style="list-style-type: none"> <li>1. The proposed road will not benefit the local area and is just a route for through traffic.</li> <li>2. The increase in traffic in the area which will inevitably happen will adversely affect the local environment.</li> <li>3. We chose to buy our property because of its 'village' location and the development of this road will destroy this status.</li> <li>4. The access to our property from the road will be severely compromised.</li> <li>5. The value of our property which was very recently purchased, with the help of a mortgage, will be reduced, and we will seek compensation for this.</li> </ol> <p>We request a full public consultation to be undertaken on the proposed Link Road.</p>	See response to ref. 85.
218		<p>I write in connection with the proposed NE Distributor Road at the Starvehall Farm New Barn Lane site and the Old Rugby Ground at Prestbury Road in Cheltenham. The traffic on Hales Road is already at near saturation point and I feel that this proposal will not only increase traffic but will also increase pollution and dangerous traffic levels in this area. We have both a children's nursery and a primary school as well as several retirement homes for the elderly in the vicinity. We have also experienced subsidence in our property and feel that any increase in traffic, especially the large trucks, can only increase the risk of further subsidence in the future. I would therefore like to object in the strongest manner against this proposal being given the go ahead.</p>	See response to ref. 85.
219		<p>We have lived some 20 feet from the Lane at the junction with Albert Road since 1964. During these 37 years the traffic has greatly increase in volume, and there are many more very heavy lorries passing at speed and shaking our whole house.</p> <p>I wish to register my very strong objection of the proposed alternative link road connecting New Barn Lane with Prestbury Road, for the</p>	See response to ref. 85.

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		<p>following reasons:</p> <ol style="list-style-type: none"> <li>1. The road would provide a through route for traffic between the A40 London Road and the A435 Evesham Road.</li> <li>2. There would be a further significant increase in numbers of light and heavy vehicles.</li> <li>3. Resultant pollution, noise and vibration will degrade my quality of life, and probably damage our property.</li> <li>4. Safe access to our property would be even more difficult than at present. (I already prefer to put the car in our remote garage rather than risk reversing into and out of our front drive).</li> <li>5. The nature of Prestbury as a village would be destroyed.</li> <li>6. Property values would be reduced - for which compensation would be sought.</li> </ol> <p>I therefore request that a full public consultation is undertaken on this proposed Link Road.</p>	
220		<p>Proposed link road, Prestbury Road - New Barn Lane.</p> <p>I am sure that for a proposal of this significance you will have surveyed the existing traffic flows and numbers, and predicted the consequences of the link road. Please tell me where I may see the reports. In particular I would like to know the effects on Swindon Lane, Evesham Road, New Barn Lane and Albert Road. I would also like to know if there are to be any accompanying road improvements/changes to these roads, or to the weight of permitted vehicles.</p>	See response to ref. 85.
223		<p>Would like to take the opportunity to ask the councillors some questions, as so far no one has spoken to people living in New Barn Close or New Barn Avenue, both of which would be affected by the proposed plans.</p> <p>Tatchley Link has been an idea for over 20 yrs and traffic conditions have changed considerably in that time. Main load of traffic comes from B4632 into Prestbury and heads towards the London Road, or along Prestbury Road into town. Current jams in High St have increased since Bouncers Lane made one-way. All locals know that there are queues in the Burgage - used as a shortcut via Shaw Green Lane to circumvent High St. Most cars then turn left back towards roundabout at Tatchley Corner. Proposed links would not resolve that problem in any way.</p> <p>Why sudden rush to get link in place when workers at GCHQ will soon use a different</p>	See response to ref. 85.

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		<p>route to work, thereby changing traffic conditions again? Are Prestbury PC and PAB keen on link as they may be able to make money by selling land on the playing field?</p> <p>PAB suggest that development of homes beyond New Barn Avenue necessary to fund link. Several considerations arise from this@</p> <ol style="list-style-type: none"> <li>1. Any new developmen will require further access roads.</li> <li>2. Traffic will increase even more.</li> <li>3. What does Parish Council want to do with any money raised from selling the required portion of the playing field? Does it want to fight the bypass around the more affluent part of Prestbury?</li> <li>4. Link will render the existing and much used playing fields useless for football, rugby and cricket.</li> <li>5. Will this then provide an excuse to eventually sell the rest of the field off for more houses?</li> <li>6. Creation of new roads, and especially proposed Tatchley Link, will endanger children visiting the Pavilion for their regular playgroups.</li> </ol> <p>We have been asked for signatures to help prevent additional houses being built in Noverton and to stop a bypass, protecting greenbelt land. But seems alright to inflict hairpin bends, roundabouts and housing developments on people living in this 'less affluent' part of Prestbury. One home, housing elderly people, will have road go past their bedrooms at a few feet distance whilst other residents will have proposed link within yards of their back doors.</p> <p>Residents of New Barn Close already tolerate double parking by people using playing fields and thereby support the local community, even at their own inconvenience. Presumably local councillors have not realised this as they either live in more well-heeled parts of Prestbury or outside parish.</p> <p>It would be nice to think that elderly people, children and ratepayers of all Prestbury were given more consideration, especially when Tatchley Link makes no sense to anyone actually living in vicinity. Seems morally wrong to impose such a scheme on people when other, less extreme, measures could be adopted.</p>	
225		I wish to register my objection to the proposed link road between New Barn Lane and Prestbury Road. The ensuing increase	See response to ref. 85.

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		<p>in the volume of traffic, and the proximity of the proposed roundabout, will make access to my property even more difficult than it is now; it will also adversely affect its value.</p>	
227		<p>I write to register my objection to the proposed link road between New Barn Lane and Prestbury Road and to request a full public consultation. Reason for my opposition is predominantly centred around detrimental social and environmental impact it will have on area.</p> <p>Proposed road provides no advantages for community, but provides opportunity for County Council to sell adjacent land to developers for housing. Already significant no. of housing developments planned or underway within Prestbury and surrounding area so do not see need to destroy more of landscape unnecessarily.</p> <p>Road will bring obvious environmental pressures to area - noise, pollution etc</p> <p>Road will see loss of yet more open recreational ground and sports pitches when there is already a shortage in Cheltenham area - Cheltenham already falls well short of NPFA guidelines. County Council has allowed playing pitches to fall into disrepair so potential users have been dissuaded from using this facility. This has enabled County to render the land not used for sport. Find method employed by County Council quite deplorable, especially as both local parish council and borough council have expressed interest in maintaining land for sport. Loss of recreational/sports facilities in town will also affect health of local community and deprive next generation of a facility where they are able to play and take part in sport and recreational activities.</p>	See response to ref. 85.
230		<p>I have recently received advice on the route of the potential NE distributor road [New Barn Lane/Prestbury Road link]. I wish to register my objection to this proposal and ask for a full public consultation into this route. My objections stem from the potential hazards that will arise - increased traffic both type and volume, additional noise and pollution by using an already very busy inner link road. Whilst I understand the need to reduce the amount of traffic entering the town I cannot see how this proposal will alleviate the current problems faced by traffic entering the town from the North or East of Cheltenham</p>	See response to ref. 85.
231		<p>We would like to register our objection to the proposed alternative route for the Tatchley Lane Link Road which would connect New Barn Lane and Prestbury Road through</p>	See response to ref. 85.



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		<p>Starvehall Farm and the Prestbury Road rugby field. Our objection is based on the following points:</p> <ol style="list-style-type: none"> <li>1. The road will provide a through route for traffic wishing to cross from the A40 London Road to the A435 Evesham Road.</li> <li>2. The volume of traffic will increase significantly.</li> <li>3. There is potential for increased volume of heavy goods vehicles which would have a detrimental effect on the existing residential area.</li> <li>4. The current speed limit is too high and increased traffic will increase the danger for pedestrians, cyclists and motorists.</li> <li>5. There are existing 'hotspots' for traffic at the entrance to the University of Gloucestershire halls of residence, bus stops and local shops. The proposed route will compound the problems experienced here.</li> <li>6. Resultant pollution and noise will degrade our quality of life.</li> <li>7. Safe access to and egress from our property will become even more difficult than at present.</li> <li>8. There will be an adverse effect on the environment.</li> </ol> <p>We would therefore request that a full public consultation is undertaken on this proposed link road and that information is made available to the public as soon as possible.</p>	
232		<p>The proposed residential development between New Barn Lane and Prestbury Road will automatically increase the amount of traffic in the vicinity. Nevertheless residential development must be allowed in order to meet the demands for housing in the future and so I feel there are probably no real grounds for objection except on a purely personal level.</p> <p>The proposed link road SHOULD provide a more suitable route between the A40 and Swindon Road for the very large and long delivery vehicles which, at present, endeavour to pass up and down Tatchley Lane despite the notices indicating that the route is unsuitable for heavy vehicles. (No attempt is made nor has been made over the last 20 yrs to enforce these restrictions).</p> <p>Any future road plans must enforce the prohibition of these heavy vehicles as they take up the whole carriageway and force vehicles travelling in the opposite direction to move onto the footpath. Tatchley Lane carries a high volume of vulnerable pedestrian traffic being close to the junior</p>	See response to ref. 85.

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		<p>school and several residences for the elderly and infirm.</p> <p>The speed of vehicles of all sorts travelling up and down Tatchley Lane is also frequently vastly in excess of the speed limit. It is only a matter of time before a child or old person or vehicles attempting to exit from the concealed entrances on Tatchley Lane are involved in some serious accident. Speed control measures should therefore be introduced in Tatchley Lane.</p> <p>I think the consequences of these proposed road changes have not yet been given enough airing and there should be further public consultation to provide information currently being prepared on traffic and environmental impact</p>	
233		<p>Following the recent residents meeting and subsequent Action Group newsletter, I wish to register my objection to this proposal [New Barn Lane/Prestbury Road Link] and I speak on behalf of my immediate neighbours and residents of Hales Road.</p> <p>What does the Council think will happen to the present traffic congestions that at peak traffic movement times stretches from the Hewlett Road/Harp Hill junction to the A40 London Road lights and down beyond Cox's Meadow? This junction is a major traffic problem and is getting worse daily, if the Council think this distribution road in any way will reduce town centre traffic, I fear they are sorely mistaken!</p> <p>Has the Council surveyed the condition of Hales Road recently? What does the Council think will happen when increase juggernaut traffic pound the currently pot holed and poorly maintained road?</p> <p>Has the Council considered what extra congestion will occur when such juggernauts are left stranded at the narrow road entry into Hales Road from the London Road lights? Or are we to see double yellow lines the length of Hales Road? I'm sure the residents would welcome that decision!</p> <p>I await an acknowledgement of receipt of my letter and believe I deserve a reply to the relevant questions raised. In the meantime, I am forwarding a copy of this letter to Mr Bungard at the County Council and members of the Action Group.</p>	See response to ref. 85.
234		I am writing to protest at proposed link road between New Barn Lane and Prestbury Road. Road will inevitably increase volume	See response to ref. 85.

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		<p>of traffic using Hales Road and Priors Road, but will also affect Prestbury Road and other areas. It will also greatly increase noise levels and pollution in my area. I am very much a believe in Greener Transport and use my bicycle as much as possible, in fact I rarely use my car. CBC should be reducing traffic, not finding alternative routes for it, which simply encourages it to increase. More funding should be provided for off-road cycle routes and use of public transport encouraged by provision of decent services which cover entire town. I request a full public consultation, including dissemination of information on traffic and environmental impact reports currently being prepared.</p>	
242		<p>I wish to object to the proposed link road from Prestbury Road through to New Barn Lane. I see it as creating more traffic problems. Also a residential area will only add to it, including noise and pollution day and night. A better way must be found.</p>	See response to ref. 85.
243		<p>Proposed link road between New Barn Lane and Prestbury Road: I understand this is proposed as the first stage in the development of Starvehall Farm. As residents of Hales Road we have noticed an increase in the volume of traffic over the last 10 years, especially during peak times, when a tailback to London Road from beyond the junction with King Alfred Way is common. I would oppose any proposed plan that could add inconvenience, danger and pollution levels as a result of using Priors Road and Hales Road as a main through route from the Evesham Road.</p>	See response to ref. 85.
247		<p>My concern among many about the proposed new road [New Barn Lane/Prestbury Road Link] is the increase of traffic down Shaw Green Lane via Bowbridge Lane and The Burgage. Already from 7.30-8.30am people are short cutting to miss the traffic build up through the High Street and Deep Street. If the proposed new build development goes ahead at the top end of Mill and Noverton Lane, I am sure again, more traffic will cut down the roads I have mentioned. All this traffic flow will be a huge build-up in New Barn Lane back from the proposed new roundabout.</p>	See response to ref. 85.
249		<p>We wish to register our strong objection to the proposed new Link road to run from New Barn Lane through the new housing development to Prestbury Road. [At a recent meeting] there was an overwhelming feeling of objection, and this we feel was due in the main to the total lack of communication or discussion/consultation with local representatives or local residents. We strongly condemn this action and question</p>	See response to ref. 85.

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		<p>the fact that courtesy and democracy were certainly missing from the CBC agenda! Are we now to presume that this new proposed Link Road will be a substitution for the Tatchley Lane Link Road. We, and many others feel that this Tatchley Lane Link Road would be a much better option and would not be so disruptive to people living in the area and would definitely safeguard some of the environmental issues surrounding this latest proposal.</p> <p>We fully appreciate the need for housing development, even though green fields are disappearing at an alarming rate, and have been informed that 350 houses would be built on the Starvehall Farm fields and the recreation field bordering Prestbury Road. This is fact, and we have to accept change, but it worries us that this Link Road (presumably aimed at rerouting a great volume of traffic, including heavy goods vehicles, away from the town centre areas) will be very busy through route for traffic wishing to transit between the A435 Evesham Road and the A40 London Road. We do not think this sort of road should got through a new residential development - worries about safety of residents, pedestrians, cyclists and increase in pollution.</p> <p>Main consensus and vote at meeting was that the Starvehall Farm fields down to Rushy Mews could become one development, with access from New Barn Lane, and the recreation field another development with access from Prestbury Road. Would preserve hedgerows, trees and stream and also wildlife. Will welcome opportunity for public debate before any decision is taken on Link Road.</p>	
250		I am writing with regard to the proposed link road between New Barn Lane and Prestbury Road. I would like to register my objection and request a full public consultation which should include dissemination of information on traffic and environmental impacts.	See response to ref. 85.
251		New Barn Lane/Prestbury Link Road: we would like to record our strong objections to the proposed new link road and residential development. The proposals would have a huge impact on the traffic outside of our property and on what is an already extremely busy road. We have previously written to object to these proposals and would urge the council to reconsider, given the impact on safety, pollution and local amenities.	See response to ref. 85.
252		Potential NE Distributor Road: as a resident of Hales Road I would be strongly opposed to any development that resulted in an increase	See response to ref. 85.

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		<p>in traffic along this route. Whilst this could be construed as nimbyism, looking deeper at the issue there would appear to be good justification for examining the potential impact in more detail.</p> <p>The most apparent reason would be that this development would have little benefit other than to re-route traffic from the existing roads to other roads within the town centre. Thus little gain is to be achieved and to make matters worse there would be a loss of valuable amenity land within the town centre. Could you please register my objection to the proposal until further analysis of the impact and full public consultation has occurred.</p>	
253		<p>I am writing to voice my objections to the proposed link road between New Barn Lane and Prestbury Road. This proposal is surely of great detriment to the local environment and the implications of such a development appear to have been given scant consideration. In particular I would like to highlight the following points of significant relevance:</p> <ul style="list-style-type: none"> <li>- the volume of traffic through this residential area is bound to increase in volume and scale as the proposed link road would become an enhanced link for traffic between the A40/A46 and the A435.</li> <li>- pollution levels, both noise and fumes, increase as a result of volume of traffic increase.</li> <li>- road safety for pedestrians and cyclists is potentially compromise as traffic increases, taking into account that a significant number of children would need to cross the proposed link road in order to travel to Prestbury St Marys Infant and Junior Schools, Prestbury Pavilion Playgroup and Prestbury Playmates Playgroup.</li> <li>- the land potentially earmarked for the proposed road development is green land so far undeveloped, this includes a medieval ridge and furrow field and a nesting site for bats. This land is a valuable pocket of green land, a haven for wildlife and potential recreational use.</li> </ul> <p>To conclude, the proposed link road seems far less likely to reduce the environmental impact of traffic flow and be totally contrary to local government objectives of directing traffic away from Cheltenham and enhancing public transport links within the town. There appears to be very little consideration to other approaches to alleviate the traffic problems.</p>	See response to ref. 85.
254		I wish to register my very strong objection to the road proposed as an alternative to the	See response to ref. 85.

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		<p>Tatchley Lane Link Road which would connect New Barn Lane and Prestbury Road through Starvehall Farm and the Prestbury Road rugby field. My objection is based on the following:</p> <ul style="list-style-type: none"> <li>- the road will provide a through route for traffic wishing to transit between the A40 London Road and the A435 Evesham Road.</li> <li>- the increase in traffic volume will be significantly greater than the current levels.</li> <li>- resultant pollution and noise will degrade my quality of life.</li> <li>- the nature of Prestbury as a village will be destroyed.</li> <li>- loss of recreational space.</li> <li>- safety and ease of access for pedestrians and cyclists will be compromised.</li> <li>- safe access to my property will become even more difficult than at present.</li> <li>- reduction in property values - for which compensation will be sought.</li> </ul> <p>I would therefore request that a full public consultation is undertaken on this proposed Link Road.</p>	
255		<p>My wife and I wish to register very strong objections to the road proposed as an alternative to the Tatchley Link Road, which would connect New Barn Lane and Prestbury Road through Starvehall Farm and the Prestbury Road rugby field. Our objections are principally based on:</p> <ol style="list-style-type: none"> <li>1. The heavy increase in traffic travelling from the A40 London Road to the A435 Evesham Road - the resulting pollution and noise will seriously downgrade our quality of life</li> <li>2. The loss of important recreation space and the total destruction of Prestbury as a village.</li> <li>3. Safety and ease of access for pedestrians and cyclists will be greatly hampered and, in fact, access for all to properties including ours will be made even more difficult than at present and vastly more dangerous.</li> </ol> <p>None of the above takes into account the anticipated construction of hundreds of houses around the proposed new road. All of the perils and disadvantages set forth above will be greatly exacerbated by such intense residential development in an entirely unsuitable area.</p> <p>It is impossible to quantify, at this stage, the reduction in values of existing properties in the area. Such will inevitably occur and proper compensation should be included in</p>	See response to ref. 85.

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		<p>planning. Such a consideration will probably render the whole concept economically unviable.</p> <p>We request, in the strongest possible terms, that the authorities disclose fully all of the options which are under consideration, including any possible future linkages to other road developments in the town and its environs and that full public consultation be undertaken as soon as is reasonably possible.</p>	
256		<p>I am writing to you regarding the proposed NE Distributor Road. My main objection to it is the loss of 'green space' in the town suburbs, this is valuable to the quality of life of the town and maintaining 'open' green spaces shows foresight and wisdom - think of Hyde Park and Green Park in London!</p> <p>I appreciate the proposed road would 'apparently' assist traffic flow difficulties at first sight but I think in the long term you would just swap one 'problem' for another, and lose the green space.</p>	See response to ref. 85.
257		<p>Action against a potential NE distributor road: it is evident that the proposed link road will provide an enhanced through route for traffic wishing to travel between the A40 or A46 to the A435. This is likely to significantly affect the Prestbury Road providing access to other western routes. This increased volume of traffic will naturally increase the levels of pollution and noise whilst also reducing safety and access for pedestrians and cyclists as well as parking cars. The playing fields in Prestbury Road are always in use with football, rugby, cricket and children's playing area as well as many dogs and their walkers.</p> <p>One of my other concerns is for the many children that are walked along and over Prestbury Road to school each morning and afternoon. There is a speed limit of 30 mph on the road with a reasonable amount of traffic and even this causes great fright and safety problems for the parents. Even when, almost on a weekly basis the police park up and check for speeding.</p> <p>Finally, what on earth will happen to the community feeling, way of life and the house prices. I cannot believe that CBC would approve such a thing. I thought the council's aim was to reduce the amount of traffic in the town centre, of which this is only a 10 minute walk, but this would appear to be to the detriment of the greater part of town with little consideration of other approaches to alleviate</p>	See response to ref. 85.

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		the problem. Please accept this as my strongest, deepest most heartfelt objection to this proposal. I feel I would have to move if this went ahead, as do many of the residents.	
259		<p><b>Pitville Area Residents Association</b> Intention to develop Starvehall Farm for housing has been known for many years and most people have no objection in principle to this development. However proposed link road has alarmed many members of Pittville Area Residents Association who are concern that it will attract far more traffic to the area, particularly heavy goods vehicles.</p> <p>Proposed road is unlikely to improve peak hour traffic flow since a large proportion of the traffic travelling down New Barn Lane towards Prestbury wishes to continue down Priors Road. Under the proposed road plan this traffic would have to turn right across traffic stream coming in from Prestbury Village. In addition, a significant proportion of morning traffic coming in on B4632 and B4075 also going to Oakley. Since this site will be mainly redeveloped as housing in next few years current traffic flows could change considerably.</p> <p>"Substandard' nature of Tatchley Lane has advantage of moderating to some extent volume of traffic using B4075. Building a major new highway can only increase traffic along this route. Will also have an adverse effect on Swindon Lane and Windyridge Road since a considerable proportion of extra traffic using B4075 will come from/go to western side of Cheltenham.</p> <p>In Transport Plan, council already acknowledges need for traffic calming and road width restrictions in other parts of town to alleviate effect of having a major road running through residential areas, eg PE Way, yet seems intent on creating same problem in Oakley/Prestbury area.</p> <p>In conclusion, we urge council to reconsider proposed highway which would be a disaster for the residents of the new Starvehall Farm estate and for residents in wider Oakley and Prestbury wards. We recommend the new estate be built with exits onto Presbury Road and New Barn Lane, but without a through road.</p>	See response to ref. 85.
260		<p>We wish to register a strong objection to this proposed road as a link between New Barn Lane and Priors Road/Prestbury Road.</p> <p>1. The increase in traffic levels - the amount of traffic passing the end of Coronation Road</p>	See response to ref. 85.



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		<p>is bound to increase as this road will be a direct link between the Evesham Road and the A40 Londo Road, cutting out the town centre. It is difficult enough to exit the road at present but with a roundabout blocking our view and more traffic it will become even more of a problem.</p> <p>2. Resulting in increased noise and pollution - (We actually moved to Coronation Road from Priors Road to get away from the traffic and all the problems and noise and pollution). Will the speed on this road remain at 30mph or will it become a trunk road/Cheltenham northern relief road?</p> <p>3. The loss of recreation space - I thought we were supposed to be encouraging people to take more exercise not taking such places away from them. Where have the rugby pitches gone? You have just put a wonderful children's play area at the top end of the playing field, do you really think putting a busy link road and roundabout at the end of Coronation Road makes sense. (Are children supposed to play chicken every time they want to go to the swings - Health and Safety does not seem to be an issue here!)</p> <p>4. This is likely to cause a devaluation of our property - what compensation are you considering?</p> <p>5. What type of housing are you planning on building?</p> <p>6. Where are the children going to go to school - many children in this area already do not get the secondary school of their choice and the primary school is full and now with the extra housing being built in Prestbury on the Southern side and the houses to b built on the GCHQ site plus these proposed houses where will the children go to school?</p> <p>The first we know about this link road was in the Echo. Should there not have been consultation with concerned members of the public in the first place? I therefore request a full public consultation about this proposed Link Road and housing development so that everyone can hear the truth about this scheme. Or have the council something to hide?</p>	
261		<p>As residents of Prestbury we wish to register strong objections to the proposed link road between New Barn Lane and Prestbury Road. The main objection is our fear of traffic 'mayhem' occurring at Priors Road entrance, from Prestbury Road, due to increased</p>	<p>See response to ref. 85.</p>

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		<p>volume of traffic coming from opposing directions, ie through Prestbury Village and from the proposed new relief road, accessing Priors Road. Presently it flows quite well, but certainly will not if approaching from different directions at peak times.</p> <p>Secondary reasons for objection are the obvious ones of reduced safety for pedestrians and cyclists, endangered, reduced access and increased air pollution on an already busy road. Then of course there will be more parking problems for residents.</p> <p>We request a public consultation which should include dissemination of information on traffic and environmental impact reports, currently being prepared.</p>	
262		<p>I am writing to give you my formal objection to the proposed NE Distributor Road starting with the link road from new Barn Lane to Prestbury Road. Having just moved to the area I have to admit I was not informed of this proposal prior to the letter I received from the local action group. I had decided to purchase my property as it was not so busy as alternative properties we had viewed in Gloucester Road. I had concerns, and now do have about Prestbury, about moving into town due to the pollution and risk to the children from traffic. I have also to express my concern that the value of my property will drop due to this proposal and so the family will be trapped living in a very unhealthy environment.</p> <p>It's about time councils across the nation actually began to tackle the problem of traffic instead of just building more roads. It has been demonstrated time and time again that building bigger, better roads just leads to more traffic. Wouldn't subsidised Park and Ride, which meet people's needs be a better alternative. I know that I find it frustrating and tiresome that I often have to spend up to 45 minutes trying to park for work (at Cheltenham General Hospital). I have to use the car for work so can't walk or use public transport.</p> <p>Surely there are some innovative and creative people who could come up with alternatives, instead of just more roads. I would be grateful for your comments and again reinforce my total and absolute disagreement with this proposal. My husband and mother-in-law also live at the property with my three children and we all</p>	See response to ref. 85.

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		object to this proposal.	
263		<p>With regard to the possible link road [New Barn Lane to Prestbury Road], which we understand could affect the volume of traffic along Hales Road, I would like to question whether the current situation has been assessed.</p> <p>The queue of cars waiting at the traffic lights at the London Road end of Hales Road stretches back as far as Sydenham Road South and beyond from 7.30am until around 9.30am, but moves more freely during the day until it resumes at 4.30pm until 6.30pm on weekdays. The noise and fumes make walking along the pavement a very unpleasant experience. To take a car out of the drive can take 2-3 minutes on most occasions and we try to avoid these peak times. At weekends the football supporters queue to get home and the quietest day is Sunday. The wait at the traffic lights is usually 2 minutes and it usually takes 6-8 to travel from this address to the other side of London Road. Travelling in the direction of Prestbury of course also means joining a queue of slow moving vehicles and traffic jams. Is there a better alternative to the proposed link road?</p>	See response to ref. 85.
264		<p>I would like to state that I am very unhappy about hearing the latest proposals of a NE Distributor Road. Apart from a lot more traffic using Priors Road, in which a lot of children and elderly people live, it would mean it would be a main through-fair from London Road to Evesham Road, and only a short time ago, thought went into 'de-trunking the main A46' which is a road running parallel to the proposed distributor road at a distance of no more than a couple of hundred yards away. Priors Road, Prestbury Road and New Bane Lane are going to turn into an ugly trunk road. Does not the same reason for de-trunking the A46 through this area have any valid reasons that could apply to this distributor road.</p> <p>We have a nice community in Prestbury. Because Prestbury is the size of population that it is, building more houses in this area will only destroy this caring community and the atmosphere it generates. Looking at the proposed route, it will certainly put two big roundabouts in places that will cause disturbance and nuisance to the people living in their proximity. Why push a road like this through a place of residence when it would cause much less hassle to everyone if it went around the outside of residential areas.</p>	See response to ref. 85.

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		<p>It is not only the road that will have a devastating effect on this local area, the proposed residential development will also do this, and with more leisure time being available to everyone these days, does it make sense to build houses on a playing field in the middle of a residential area? Because if those houses are allowed to be built, you will have a lot more people looking for field for their recreation. Where will you find a field for that purpose - on the outside of a residential area, where the road could have gone in the first place. If the road is needed and there is nowhere else for it to go, people had already accepted the fact than an existing plan has been proposed over 30 years ago, so why stir up another hornets nest. Why is it we are constantly writing letters of objection like this. We came here to live quietly in a village community, and all the Environmental Services seem to want to do is to make this area a small town.</p>	
265		<p>I was much disturbed after my attendance at a meeting concerning the proposed alternative Tatchley Lane Link Road connecting New Barn Lane and Prestbury Road. The object of the meeting appeared to be to organise a pre-emptive protest before the official announcement of the proposal by the authority concerned.</p> <p>As the official Neighbourhood Watch contact with the police for most of New Barn Lane I am aware of only one couple in the houses numbered 139 and above who would not welcome the proposed new alternative, which would appear to be a solution to the many problems and dangers of this busy road. In answer as to whether it would surely be better to have heavy goods vehicles traversing a purpose built new road rather than through the built up part of Prestbury the reply was that heavy vehicles would not use New Barn Lane under the original Tatchley Lane scheme as the road is not of the required standard. I understand from an official source that this is not true.</p> <p>Some older people thought that this was an official meeting as it was so professionally presented. The fact that various councillors were there by invitation appeared to add to their confusion. A draft letter of objections which some residents have been encouraged to send to you could be meaningless if some of the factual information presented at the meeting is not confirmed. May I request that a visual presentation of both schemes (showing traffic flow and related disruption to all existing dwellings and intersections) be</p>	See response to ref. 85.

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		presented before any objections, including mine, are considered valid.	
266		<p>We write to submit our objections to the proposed development of the link road between New Barn Lane and Prestbury Road. This will cause an enormous, unnecessary increase of traffic into an already busy area. Incidents of road related accidents will increase, bringing about further unnecessary injuries or even death. The environment will be ruined, the pollution increased, and noise to an intolerable level. We anticipate this may also bring about further interest from property developers who will want to erect more houses in an already over run area, and floods will revisit as a major nightmare for all concerned! As decent, loyal Cheltonians, taxpayers and council voters, we can not state strongly enough our utter and total objections to these plans proceeding any further. We ask you to stop over developing Prestbury!</p>	See response to ref. 85.
267		<p>I wish to register my extreme objection to the proposed alternative Tatchley Lane link road connecting New Barn Lane and Prestbury Road. My objection is for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The road proposed will provide a through route for any traffic wishing to transit between the A40 London Road and the A435 Evesham Road.</li> <li>2. The resulting increase in the volume of traffic will as a consequence be much greater than at the present levels.</li> <li>3. There will be increased pollution and noise which will be detrimental to one's health and quality of life.</li> <li>4. Prestbury village, which has already a significant volume of traffic passing through it, will be adversely affected. For example the traffic density will increase, giving rise to increased noise pollution, and further, diminish its nature as a village. Furthermore, the increase in traffic would produce congestion which must create problems for vehicles dealing with local shops and delivery and collection vehicles.</li> <li>5. The safety and ease of access for pedestrians and cyclists will be compromised.</li> <li>6. There would be devaluation of residential properties, for which financial compensation must be sought.</li> </ol> <p>As a consequence of the foregoing objections, I request that a full public consultation is undertaken on this proposed link road.</p>	See response to ref. 85.
268		I am writing to strongly object to yet another playing field being used for building and a	See response to ref. 85.

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		<p>new road.</p> <ol style="list-style-type: none"> <li>1. This playing field has served Prestbury well for its football teams, including teams of youngsters, for the tennis courts, playgroup pavilion, kit flying and many other things which keep young people off the streets.</li> <li>2. Race traffic from the London Road would all come via Priors Road causing queues of traffic to back up through the village at the junction with Prestbury Road. This would make the Prestbury Road even busier and worse than it usually is during race meetings.</li> <li>3. The exit from the roundabout on Prestbury Road would be alongside the day centre for the disabled where there is a wheelchair crossing.</li> <li>4. Why is it when the lottery is being approached for money for new playing fields is this council trying to seal this one off.</li> </ol> <p>Leave unspoiled one of the last green areas for the use of the public in general and leave available the means for children to meet and play and keep the off the streets.</p>	
269		<p>We wish to register our strong objections to the road proposed as an alternative to the Tatchley Lane Link Road which we understand would connect Prestbury Road with New Barn Lane through Starvehall Farm and the Prestbury Road rugby field. Our objections are based on the following:</p> <ol style="list-style-type: none"> <li>1. The road would become a through route for traffic linking the A40 London Road with the A435 Evesham Road. This would increase traffic volume to a level far greater than at present.</li> <li>2. Resultant pollution and noise will have a major impact on our quality of life.</li> <li>3. The nature of Prestbury as a village will be destroyed.</li> <li>4. We understand land for sporting activities is at a premium and this proposal would lead to further loss of an amenity.</li> <li>5. We have real concerns are safety and ease of access for all local residents, especially pedestrians.</li> <li>6. Access to Prestbury Road is already difficult at peak times.</li> <li>7. The proposed road may impact on property values and if this proves the case compensation will be sought.</li> </ol> <p>We therefore demand a full public consultation is undertaken on the proposed Link Road.</p>	See response to ref. 85.
270		As residents of New Barn Lane for over 25 years we have witnessed the severe growth in traffic volume along the road. We	See response to ref. 85.

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		<p>constantly experience difficulty entering and exiting our property with the traffic volume. The draft proposed link road through Starvehall Farm and the old rugby playing field will increase traffic volumes by an unknown (to us) factor. In addition, the type of traffic will include heavy goods vehicles currently 'dissuaded' from using New Barn Lane due to road width limitations in Tatchley Lane. Thus, should the link road be progressed, New Barn Lane will become a major highway. This will result in significant increases in the following:</p> <ol style="list-style-type: none"> <li>1. Noise level pollution</li> <li>2. Air pollution</li> <li>3. Enhanced danger to use entering and exiting our property from the road</li> <li>4. Potential for criminal activity against our property due to easier vehicular passage</li> <li>5. The traffic noise 'window' will increase with through traffic and that to and from the proposed residential developments across Starvehall Farm and the old rugby playing field.</li> </ol> <p>The above can only be detrimental to our quality of life.</p> <p>We are concerned about the lack of available information regarding this draft proposal. In addition, exactly where this draft proposal fits into any overall plan the local and county councils may have is unclear, certainly to us as residents and council tax payers. Also, the route of the draft proposed link road would appear to attempt to serve not only as a route from the A435 to the A40, but also act as a 'spinal' road for access to the various areas of the proposed residential development. Thus high volumes of through traffic and local residential traffic will merge and cross one another's path as vehicles attempt to access and exit the residential service roads. One example of this type of arrangement is Wymans Brook.</p> <p>This configuration contrasts with existing single access and entry to the majority of developments in the immediate area. The proposed residential developments would be best served by two unconnected service roads, one from New Barn Lane and the other from Prestbury Road.</p> <p>For the above reasons we strongly object to this draft proposal.</p>	
296		I am writing to you with regard to the proposal to building a Distribution Road off New Barn Lane across Starvehall Farm to Prestbury	See response to ref. 85.

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		<p>Road.</p> <p>You have already been made aware of an Action Group which is working in close liaison with the P.A.B. and opposes the outline proposals of the G.C.C. in favour of the resurrection of the Tatchley Link scheme. Due to a holiday commitment I was unable to attend the Action Group Public Meeting and although I expressed my alternative views to Mr. Taylor of that committee he chose not to make them known. Since then letters have been distributed to many residents by the Action Group, although not to me, and others have had letters published in the Gloucestershire Echo.</p> <p>In view of what might be deduced as overwhelming opposition to a Distribution Road I am writing to try and redress the balance.</p> <p>Having spoken with several of my N.B.L. neighbours I have been asked to present theirs and my views on the matter which currently opposes the Tatchley Link scheme. It is important to appreciate that the information we have is quite basic in content and we recognise that various studies have to be conducted prior to any invitation for any interested parties to comment on the results.</p> <p>I have enclosed an amended copy of the letter I sent to Mr. Taylor identifying some of the most relevant points we feel concerning each scheme and invite your comments.</p> <p>[Ltr sent to Mr Taylor] Thank you for your letter concerning the proposed 'new road' off New Barn Lane and the effort and time which you have put into this matter to date.</p> <p>I would like to comment on the following points which I believe are significant:-</p> <ol style="list-style-type: none"> <li>1. The influence which either road junction would have on Prestbury residents would involve a minimal number and could be more advantageous than disadvantageous especially with regard to traffic speeds.</li> <li>2. In the event of either road being built the current legal restrictions against large goods vehicles travelling Prestbury bound along New Barn Lane would probably be lifted since the existing nature of Tatchley Lane presents the only argument to preventing access to such vehicles at this time.</li> <li>3. Regardless of which option is adopted the housing development will be built and I was advised at a discussion shortly after we moved here that included in the Tatchley Link</li> </ol>	



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		<p>scheme was a filling station in New Barn Lane. If this materialised then the traffic flow would undoubtedly increase together with other potential problems.</p> <p>4. With reference to your point regarding additional traffic from any 'new estate' it appears to me that their natural progression would primarily be along their 'new road' either towards the racecourse roundabout or towards Priors Estate thus avoiding The Burgage area other than the library or retail shop.</p> <p>5. I cannot accept that crime would increase through having easier access. Crime is quite prevalent in this area. The 'new road' scheme could give the impression of introducing a more 'village' feel to the area and residents might feel that they should accept more responsibility for the welfare of neighbours and their property in a more personal community thus becoming more crime prevention orientated.</p> <p>I believe that there are some additional plus points to the G.C.C. scheme and they are:-</p> <ol style="list-style-type: none"> <li>1. With the introduction of an offset roundabout or two the speed of traffic along N.B.L. would be interrupted and thus aid safety and make life less stressful for many residents both prior to and after the hazards.</li> <li>2. By introducing the 'new road' it could reduce the number of heavier and even light vehicles traversing the majority of New Barn Lane though regrettably not where you live I suspect and we are most sympathetic to you in this respect.</li> <li>3. It would eliminate the hazardous hill outside my property from the main thread of traffic and the danger which drivers and riders choose to ignore to the definite detriment of those living adjacent to it who have to risk life and limb getting out of their drives or crossing the road even with the current increased traffic flow.</li> <li>4. I believe that a 30mph speed restriction would more likely be introduced with more residential properties in the area. A tactic which has been discussed for about two years to my knowledge without any positive action having been taken to date.</li> </ol> <p>It is my contention that the Tatchley Link would do little to make life more agreeable for the majority of N.B.L. residents and could make life worse for several if not the majority. It would present a free flowing run up N.B.L. as well as down and average speeds would probably increase with the 'bottleneck' of Tatchley Lane removed.</p>	

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		<p>In addition I understand a system of bollards at the top of the hill adjacent to the property is proposed, though details are sketchy at this time, and this too would deter some as well as kerb others from violating the rarely policed road.</p> <p>What I and several other residents take umbrage at is the total lack of local consultation with those to whom it could affect most and that had this not been reported in the Gloucestershire Echo we could still not have known about it.</p> <p>My wife and I would be very keen to get more involved in any additional consultations or constructive discussions on this matter not only because of where we live but because I have a special interest as a Road Safety Consultant. Locally I advise the Cheltenham Road Safety Liaison Group and am a qualified Home Office Crime Prevention Officer.</p>	
297		<p>It has just come to my attention that there are plans afoot for a potential 'NE Distributor Road', which it seems is going to greatly affect my quality of life. I live in Welland Lodge Road, a quiet road, which backs onto the pleasant Starvhall Farm. I have access therefore to walks which can be as short or long as I please, either just going over the farm and back for a pleasant stroll, or over to the racecourse and further up on the hill. I also have the alternative to go for a walk in the playing fields in Prestbury Road. A circular walk can be made, incorporating the two, and now I am hearing that all this is likely to be taken away from me. These are pleasures that I have enjoyed for nearly 40 years and I hear about it simply from a paper through the door. Should not at least the residents of the area be consulted regarding such dramatic and detrimental plans?</p> <p>I have heard that this plan has currently been withdrawn due to protest and am very pleased to hear this, but would like to express my unhappiness about the plans, as it seems there are still possibilities to bring them back to life. I would also like to know what is happening to Starvhall Farm. Surely there are other brownfield areas in and around Cheltenham where housing can be built? Sadly, my local area is going to change its character completely if your plans go ahead.</p> <p>Cheltenham's public transport system is very poor and is also too expensive. Instead of looking at vast and expensive road schemes, the Council should be putting money into</p>	See response to ref. 85.

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		<p>better services, providing bus lanes so that buses can move quicker and hence be more attractive to people. The answer to traffic problems is never to build more roads, this only drags us down into more pollution and more chaos. The only way ahead is to encourage people away from their cars. In fact, the harder it is to make their journey, the more likely they are to consider alternative methods of transport! Building more roads simply ruins our local environment, our health and safety, whilst encouraging more traffic.</p> <p>Many thanks for taking my opinion into account.</p>	
301		<p>[Summary] We would like to register our objection to this proposal [New Barn Lane/Prestbury Road Link Road] in the strongest possible terms. Our reasons are as follows:</p> <p>Increase in volume of traffic and congestion - Prestbury Road already a busy route into Cheltenham - plan would serve to increase the volume of traffic, creating more congestion.</p> <p>Destruction of a green area - playing field/recreation area behind Day Care Centre only place in this densely populated district of Cheltenham where children may go to play football or where people may go for a walk of exercise. Potential for increased social problems if this much valued and well used recreation area eliminated.</p> <p>Concentration of traffic in a densely populated 'bottle neck' area - Pittville Circus a tiny roundabout and traffic often backed right up Prestbury Road to Day Care Centre at peak times.</p> <p>Irreparable damage to a well-established area of Cheltenham - road will forever destroy charm of northern side of Cheltenham. Property values would naturally be adversely affected.</p> <p>Unacceptable effect on quality of life for local residents - council should protect town against heavy road traffic in order to maintain Cheltenham's standards of living. Road will only concentrate more road traffic in Pittville area. Rather than a solution, constitutes a serious aggravation to road congestion.</p> <p>Decline in road safety for local residents and their children - many children and students walk along this road each morning and evening. Any increase in traffic would pose</p>	See response to ref. 85.

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		an obvious danger to them.	
302		<p>[Summary] [Letter signed by 5 residents]  Concerned about planned development of link road between New Barn Lane and Prestbury Road, which appears to be first stage in a proposed housing development for Starvehall Farm and the old rugby field.  Concerned about lack of public consultation over these proposals.  Thinking seems to be that open land within town is wasted, but very reason for our pleasant, peaceful environment is that we have open spaces. Are there so many sporting facilities in Cheltenham that town can sanction neglect which has created lack of demand for a now low-quality rugby field? With care it would be a wonderful attraction for the community.  Road will lead to horrendous rise in traffic, bringing noise and pollution and will increase fear and crime caused by boy-racer yobs. Traffic increases caused by development will lead to inevitable decline of area.  The contours of the land proposed for building area such that severe drainage problems are almost certain to result on Cleevemount Road and Welland Lodge Road.  Those who find the plans a 'good idea' should go and look at New Barn Lane now - it is a rat-run of speeding motorists. Life already difficult for residents and this would only increase. Property prices will fall, people will move out and a community will no longer exist, which will lead to a rise in crime. Economically the proposal is almost incredibly short-sighted as it will affect prestige of racecourse and endanger popularity of the town as a high quality destination.</p> <p>Whole issue is contentious and a full consultation is a necessity. To conclude:</p> <ul style="list-style-type: none"> <li>- representative democracy is meaningless without accountability and consultation</li> <li>- a good environment is easier to destroy than to create</li> <li>- housing and a successful link road may well be mutually exclusive concepts</li> <li>- open spaces are a necessity; sports fields are valuable to the community</li> <li>- crime is an issue, it is easy to import and almost impossible to eliminate</li> <li>- Cheltenham and its racecourse project an image threatened by this proposal</li> <li>- lack of transport choices is directing us to our cars and eventual gridlock</li> <li>- would the link road be such an attractive proposition if it were not part of a for-profit-</li> </ul>	See response to ref. 85.

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		package involving the eventual sale of housing land?"	
306		<p>I am very concerned to hear about plans for a potential NE Distributor Road. The area I grew up in, Welland Lodge Road, which backs onto Starvehall Farm is a very pleasant area, with short walks available nearby over the farm and onto the racecourse as well as to the playing fields in Prestbury Road. I am shocked to hear that these green areas area likely to be taken away from us and in their place to be heavy, polluting traffic. I do not think that this kind of plan is the answer to Cheltenham's traffic problems. Surely such proposals should be weighed up very carefully against all other factors, the loss of playing fields, the destruction of leisure land, all the extra services created by more housing in an area, the increase in traffic and the generally detrimental effect on all those who live in the area.</p> <p>I am affected little by traffic problems as I cycle everywhere, which can be a rather hazardous occupation in Cheltenham, and this is not going to be helped by such roads. I do see the horrendous congestion however and know that a solution is needed, but this should not be through building more roads. Haven't the government already discovered that building larger roads just increases the amount of traffic on them? No, the answer is in reasonably priced public transport that people can rely on, good, safe, cycle lanes and pleasant paths for us to walk on, in and around the town. I thought that the objectives of the Council were to provide a cleaner town, with more sustainable transport and long term environmental solutions?</p> <p>I have heard that the plan has currently been withdrawn, although I am not so sure what is happening regarding plans for the Starvehall Farm housing development. I am writing to you to express my shock and upset at the current plans, and asking for reassurance that this plan will not be resurrected.</p>	See response to ref. 85.
<i>proposed land allocations</i>			
86		<p><b>Hunter Page Planning</b> see file for full text, including transport feasibility report and landscape appraisal.</p> <p>Land at Hatherley Lane offers potential for development of a large retail use. Landscape appraisal of the site identifies that retail development may be accommodated on the site with careful design and implementation of a planting strategy. A transport feasibility report prepared for the site concludes that</p>	<p>The local plan seeks to meet housing and employment requirements set out by the Structure Plan. The allocation of land to meet these needs are set within the strategic theme of sustainable development which includes the need to make the best use of land, particularly previously developed land (brownfield).</p> <p>The Council are currently preparing an assessment of potential employment sites within the town. The Council will consider the allocation of brownfield</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		<p>retail development may be suitable, provided it is supported by an appropriate package of measures to improve sustainable transport and the highway infrastructure. Measures identified include; a dedicated bus service to the site to Cheltenham and Gloucester, and other urban areas within the wider geographical area. Contributions to improved bus services, upgrading of pedestrian and cycle routes, and preparation of a green travel plan.</p> <p>To achieve sustainable development the Government is currently emphasising the need for the majority of development to take place in urban areas. Where there is a lack of sustainable brownfield/greenfield sites within these areas the Government recommends that extensions to urban areas are created. The most sustainable option for Cheltenham is to extend the urban boundary.</p> <p>The site is in a highly sustainable location, close to an established residential area and other employment opportunities, public transport connections, in particular Arle Court Park and Ride. Review of the Green Belt would represent a sustainable urban extension to Cheltenham consistent with RPG10 which examines the need to review Green Belt boundaries. RPG10 sets out that Gloucester and Cheltenham should be the central focus for growth in Gloucestershire. Allocation of the site for retail development is consistent with RPG10 policies SS4 - Green Belts, and SS12 - Gloucester and Cheltenham</p> <p>Gloucestershire Structure Plan (policy S1) states that the majority of development should be accommodated in Gloucester and Cheltenham. This plan was prepared prior to RPG10, greater weights should therefore be given to RPG when determining the appropriateness of the proposed development.</p>	<p>sites within the urban area in addition to applying the principles of sequential testing on suitable sites, only if there are no suitable sites in town should the Council begin to look at the edge of the town.</p> <p>The site proposed for retail development is located wholly within the Green Belt in a highly visible location. Development in isolation would represent an ad hoc intrusion into the countryside.</p> <p>Review of the Green Belt boundary is being considered by the third review of Gloucestershire Structure Plan.</p> <p><b>Local plan objectives O5, O6, O7 , O9, O12, O13, O14, O19, O20, O21</b></p> <p><b>Recommend</b> consider findings of report on assessment of demand for employment land and assessment of sites.</p>
119		<p><b>Prowing Projects</b> The LPA acknowledges the need for 12ha of employment land, but no proposals have been advanced by the council on where this requirement may be accommodated. Similarly, no recommendations have been made in regard to the Regional Assembly's edict that large strategic sites are required at Cheltenham. We submit that the area to the south-west of Swindon Village, including Manor Farm and Swindon Farm, should be examined for large-scale mixed use developments. Swindon Farm had been under active examination by IKEA. We consider Swindon Farm to be</p>	<p>Greenfield site in agricultural use, located wholly within the Green Belt. Site lies adjacent to existing employment uses with good access to M5 Junction 10.</p> <p>Review of the Green Belt boundary is being considered by the third review of Gloucestershire Structure Plan.</p> <p><b>Local plan objective O12, O13, O14, O19, O20, O21</b></p> <p><b>Recommend</b> see ref. 86.</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
189		<p>eminently suitable for IKEA's requirements.</p> <p><b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b> Allocation of sites for housing development, RMC would wish to promote their greenfield site at Charlton Kings for inclusion in policy in order that site is included in policy in Deposit Draft of Local Plan Review.</p> <p>RMC are keen to promote a sustainable site for housing development that lies on urban fringe in Charlton Kings. Site is not previously used land but relates well to existing community with shops and services accessible by pedestrians and cyclists. Site also relates well to public transport corridor of A40 as well as to bus stop provision at Sixways with a regular bus service every 15 minutes.</p>	<p>The draft development strategy allocates land for housing development (Policy PR1), including the allocation of greenfield land at New Barn Lane. Local plans need to identify sufficient land to meet the first 5 years of housing development proposed. Through the application of the plan, monitor and manage approach allocations will be reviewed and updated, taking into account the uptake of sites identified in the urban capacity study and windfall sites on previously developed and greenfield sites. It is therefore inappropriate at this time to allocate land for housing over and above Cheltenham's housing requirements.</p> <p>Site is located wholly within the AONB. In applying the principles of sustainable development, the Council will apply the sequential test set out in PPG3. Only when there are no suitable sites in the urban area will the Council begin to look at the edge of the town.</p> <p><b>Local plan objective O5, O6, O7, O9, O13, O14, O22</b></p> <p><b>Recommend</b> reflect findings of urban capacity study.</p>
194		<p><b>Mason Richards Planning (on behalf of Bovis Homes)</b> Not a satisfactory response to current position regarding housing land supply and urban capacity. Essential that Council goes further than allocation of only one site to meet Structure Plan housing requirements, at least in reserve, with a view to meeting potential shortfalls. Opinion of Bovis Homes that an opportunity exists at Leckhampton to produce a phased development.</p> <p>Bovis also has concerns about lack of any identified employment land sites. However Bovis welcomes decision of Council not to release land from Green Belt to north west of Cheltenham to meet employment land deficiencies. Opportunity exists at Leckhampton to integrate employment development with future residential development in a sustainable mix. Policy PR2 as proposed should be amended to allow for opportunity that exists at Leckhampton for mixed use.</p> <p>Re Policy PR1 allocation of land at New Barn Lane/Prestbury Road should be reconsidered in context of objective of Plan to protect important public open spaces and playing fields.</p> <p>In light of these representations, need to alter approach to Spatial Strategy. Statements such as those at para 4.34 that all new development will occur within existing built-up area not regarded as appropriate.</p>	<p>The methodology adopted by the Council in the preparation of the urban capacity study has sought to be as robust as possible in assessing the potential supply of previously developed land over the plan period, including the application of realistic assumptions in the projection of trend data. In line with the governments approach to plan, monitor and manage, the study will be reviewed and adjusted accordingly taking into account development over the plan period assessed against the survey results of potential urban capacity to mid 2011. Review of the study may require sites phased for a later period of the plan to be brought forward, or sites pushed back to a later phase, should sites not previously identified which offer sustainable development solutions come forward through the plan period. In line with the provisions of PPG3 the presumption will be that previously developed sites should be developed before greenfield sites.</p> <p>Land at Leckhampton represents a strategic resource for development in the long term. The urban capacity study and draft development strategy set out that Cheltenham's housing requirements can be met within the urban boundary. Development of land at Leckhampton would therefore be adhoc, and lead to an over supply of housing over the plan period.</p> <p><b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O19, O20, O22</b></p> <p><b>Recommend</b> consider findings of urban capacity study and findings of assessment of employment land.</p>

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274		<p><b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> In our view, Borough is unlikely to meet its housing needs by the allocations set out in paras 4.12 and 4.13 (over 2/3 of capacity to come from unidentified sites). Would suggest identification and inclusion of additional sites and have previously suggested Hunting Butts as an appropriate location which would deliver a number of other sustainability benefits.</p> <p>Believe that Policy PR1 should include land at Hunting Butts.</p>	<p>Comments noted.</p> <p>Site located wholly within the Green Belt. Site is divorced from the urban area of the town and would represent ad hoc development.</p> <p><b>Local plan objective O5, O6, O7, O9, O13, O14, O22</b></p> <p><b>Recommend</b> reflect findings of urban capacity study.</p>
277		<p><b>King Sturge (on behalf of Douglas Equipment Ltd.)</b> Douglas Equipment Limited are currently reviewing their site requirements with a view to rationalising the current site at Village Road, Cheltenham.</p> <p>This brownfield site is located within a predominantly residential area, in north west of town. Site is relatively flat and extends to approximately 3 acres. Such a site would help in accommodating addition 2,665 new dwellings required up to 2011. Furthermore, it would help in alleviating current traffic congestion and road safety problems in surrounding residential roads which are associated with the company's activities.</p> <p>Should this be the preferred option an office presence with a smaller warehouse facility would be retained. This would allow for surplus land to be developed for housing.</p>	<p>Recent developments in Cheltenham have resulted in a loss of employment sites through change of use to residential. The Council recognises the need to consider employment land supply through the local plan review process, both in terms of assessing existing employment sites and the need to allocate additional land to provide flexibility in the choice of sites for business and help expanding companies to remain within the town.</p> <p>Site designated as industrial land in adopted local plan.</p> <p><b>Local plan objective O6, O7, O12, O13, O14, O19, O20, O21</b></p> <p><b>Recommend</b> see ref. 86.</p>



**DRAFT URBAN CAPACITY STUDY**

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
119		<p><b>Prowting Projects</b> There is an element of double counting between the yield for 'changes of use' and 'land in employment use' categories. Correspondingly the development yield for the latter should be halved to 100 units.</p> <p>The adjusted figure for new dwellings is stated as 2,665 units. Following the acceptance of the Roger Tym study, it is now accepted practice amongst planning authorities to incorporate 10% contingency allowance. This means that the local plan should look to accommodate 2931 units.</p> <p>Over optimistic assessment by the council on the development yield for sites 10, 11, 12 and 14. The possible car park development candidates are unrealistic, since these facilities contribute towards the vitality of the town centre. At best, a notional 50 capacity should apply.</p> <p>Retail proposals are to be implemented on site 3, this site is consequently not valid for 100 dwellings.</p> <p>The suggested density for the following sites is wholly unrealistic and the counter development yield in each case is set out;</p> <p>site 10 (capacity 20) reduce to 15  site 11 (capacity 80) reduce to 60  site 12 (capacity 15) reduce to 10  site 14 (capacity 250) reduce to 200</p> <p>Correspondingly, the yield from the schedule of 14 sites would alter from 692 units to 612.</p> <p>Para.34 of PPG3 requires that sufficient sites should be shown on the local plan proposal map to accommodate at least the first 5 years (or the first 2 phases) of housing proposed in the plan. By the council's own admission, (para.3.58 UCS) the annual average for permission is 280 dwellings. This generates a 5 year new housing requirement of 1,400 dwellings to be shown on the proposals plan. The emerging local plan is therefore deficient in identifying only 622 units within the 14 scheduled sites. Correspondingly, an additional 778 units need to be added.</p> <p>It is our view that implementation for the 14 sites will be;</p> <p>Site 1 - Pre 2006      Site 2 - Post 2006  Site 3 - Pre 2006      Site 4 - Pre 2006  Site 5 - Post 2006     Site 6 - Pre 2006</p>	<p>The Urban Capacity identifies that potentially residential development may come forward on land which previously was in employment use. A nominal figure of 200 is included to allow for this potential. To ensure that double counting does not take place, a figure of 200 has been discounted from the change of use category within which land in employment use was initially projected.</p> <p>The Urban Capacity Study recognises that car park sites identified for redevelopment are important sites for a number of land uses, including retailing, commercial, and retention of car parking. However due to the location of the sites and in line with government guidance to increase densities where appropriate and make the best use of land, it is considered that such sites, through innovative design may support high density residential development.</p> <p>Site 12 : Landmark site which has the potential to accommodate a significant 5-6 storey feature, with commercial uses at the ground floor level and residential development above.</p> <p>Site 14: Well located site in terms of existing facilities and services within the immediate locality. Site has the potential to accommodate a high density development.</p> <p>Site 3: Revised Urban Capacity Study will reflect the retail planning consent on land off Grovefield Way.</p> <p>Local plans need to identify sufficient land to meet the first 5 years of housing development proposed. Through the application of the plan, monitor and manage approach allocations will be reviewed and updated, taking into account the uptake of sites identified in the urban capacity study and windfall sites on previously developed and greenfield sites. It is therefore inappropriate at this time to allocate land for housing over and above Cheltenham's housing requirements.</p> <p>Suggested site implementation schedule reflects that set out in the Urban Capacity Study.  <b>Local plan objectives O5, O6, O7, O12, O13, O22</b>  <b>Recommend</b> Urban Capacity study will be</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		Site 7 - Pre 2006 Site 8 - Pre 2006 Site 9 - Pre 2006 Site 10 - Post 2006 Site 11 - Post 2006 Site 12 - Pre 2006 Site 13 - Pre 2006 Site 14 - Pre 2006	reviewed and placed on deposit with the deposit draft of the local plan, Summer 2002.
127	3.56	<b>Leckhampton Parish Council</b> We are pleased to note that such a high proportion of the required number of sites can be met through the use of brownfield land, noting that a site in Prestbury can be used to make up the small shortfall.	Comments noted
158	Table 2	<b>Gloucestershire Constabulary</b> Object to the proposed density for housing development on the site. The Constabulary feel that a higher level of development should be achieved on this site due to its location and links to the town centre. PPG3 requires Local Planning Authorities to make efficient use of land and encourages development at higher densities. It refers to 30-50 dwellings per hectare as a rough guideline for developers and planners; however, it argues that greater intensity development will be encouraged at sites with good accessibility to public transport. The recently published companion guide to PPG3 'Better Places to Live by Design' further reiterates PPG3 objectives and encourages good practice high density development.  The Constabulary proposed the housing capacity of the site be amended to provide for 57 dwellings. This assumes a site density of 50 dwellings per hectare. The site benefits from a relatively central location and is well served by public transport, which is accepted by the Council in 'The Site Assessment Checklist' at Appendix 3. Buses travelling between Gloucester and Cheltenham stop at regular intervals along the Lansdown Road close to the site and the site is easily accessible to the Cheltenham Spa Railway Station with services running between Birmingham and Bristol. The existing density within the vicinity of the site will also be an important consideration. Indeed there is a mix of high density developments adjoining the site.	PPG3 requires local authorities to apply increased densities to new development. However, the application of increased densities within the context of the site and adjacent development must be considered. <b>Local plan objective O2, O6, O7, O11, O23 Recommend</b> innovative design solutions may enable higher densities to be considered on land at Lansdown Road, this will be considered in the revision of the urban capacity study.
170		<b>Pittville Area Residents Association</b> Pleased to see that unused floor space above retail premises could be converted for residential use. However the proliferation of clubs and pubs in the town centre may discourage people from wanting to live there.	The plan recognises the importance of the night time economy, however the review of the plan will consider how these uses should be controlled to ensure personal safety and protect the quality of life for residential areas within the town centre. <b>Local plan objective O3, O6, O7, O22, O23 Recommend</b> consider findings of report 'Evaluation of Cheltenham Night Life Economy' prepared by Cheltenham and Gloucester College of Higher Education.
182		<b>Cheltenham Cycle Campaign</b> Site 3 - cycle path referred to is not ideal for	The assessment checklist of the Urban Capacity Study did not seek to analyse cycling provision in

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		<p>brisk commuting - scored too high?</p> <p>Site 4 - there is a specific facility, mainly as for site 3, but neutral score is about right.</p> <p>Site 5 - readily reached by roads which we consider reasonably 'cycle-able' for competent and confident cyclist - consider neutral score.</p> <p>Site 6 - despite cycle paths/lanes these are too narrow in places, especially at islands, and traffic speeds are excessive - overall should be judged no better than site 5.</p> <p>Site 7 - surely PEW shared use path is accessible? Good example of shared use, with rights of way retained at junctions and Orchard Way and Alstone Lane have some calming measure. But area still busy with substantial amount of speeding traffic, so neutral assessment about right.</p> <p>Site 8 - comments as for site 7.</p> <p>Site 9 - PEW facilities mentioned, but for reasons above score should be neutral. (Not sure Pates can be considered a 'local' school.)</p> <p>Site 11 - shared use bus lane and traffic lights at St Margaret's Road/Albion Street make this by no means bad cycle route, particularly for confident and competent cyclist. Consider neutral score.</p> <p>Site 12 - no facilities and 'measures' not good either; could argue should not score as high as 'fair'.</p> <p>Site 14 - until see results of clear plans for this development must be assessed 'poor'. Although land 'level' and close to town centre, have concerns that route to town centre, either via Chelt Walk or Knapp Road will not be straightforward, that link from Honeybourne line/St George's Road will not be adequately reinstated and old link to Millbrook St will be lost. This route had advantage of light controlled access straight across to Arle Road and to areas further out. Planned cycle route through site will spill cyclists onto Gloucester Road at 'cycle unfriendly' spot. Must be assessed as 'poor' for time being. Anticipated provision of isolated 'facilities' have over-impressed Assessor.</p>	<p>detail. The assessment attempted to provide an overview of existing facilities provided by cycle lanes. The assessment did not assess the ability of competent and less experienced cyclists to navigate the road network.</p> <p>Detailed comments provided will be taken into account when the urban capacity study is reviewed.</p>
189		<p><b>Foxley Tagg Planning (on behalf of RMC UK Ltd)</b></p> <p>1. Study makes many assumptions about deliverability of identified sites. Some sites still in use by current occupier and in today's uncertain economic climate no absolute certainty that these sites will come forward in time to delivery housing in current plan period.</p> <p>2. Also not certain that densities proposed at identified sites can in practice be achieved. Indeed density of development at sites has been reduced as a result of negotiation. If all identified sites unable to achieve projected capacity then again there will be a shortfall of</p>	<p>The urban capacity study has sought to be as robust as possible in identifying sites to meet Cheltenham's housing requirements. In line with the governments approach to plan, monitor and manage, the urban capacity study will be amended where appropriate. This may include bringing sites forward, or pushing sites back, should sites not previously identified which offer sustainable development solutions come forward through the plan period. In line with the provisions of PPG3 the presumption will be that previously developed sites should be developed before greenfield sites.</p>

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		<p>housing land supply.</p> <p>3. When not possible to achieve levels of development projected for identified sites in study then some doubt must be raised over potential supply of large and small windfall sites identified by each capacity source.</p> <p>4. Fair to state, therefore, that consideration should be given to release in review of Local Plan of more than one new greenfield site for housing development.</p> <p>5. Seeking best use of land by facilitating higher housing densities on all new housing developments is welcomed. Necessary, however, for an indication to be given to development strategy that will need to emerge, should brownfield sites not come forward in sufficient number during plan period 2000-2011.</p> <p>6. Considered that it will not be possible to achieve all Cheltenham's housing requirements on brownfield sites. Local planning authority should therefore identify their preferred green field sites for housing development over and above one site identified at Policy PR1.</p> <p>7. Considered that a failure to address this issue at this stage will result in shortfall of housing land supply mid term, resulting in knee jerk release of greenfield sites by local planning authority. Such sites may not have been carefully considered or subject to full public consultation process.</p> <p>8. RMC would therefore wish to promote concept of their site at Charlton Kings as a sustainable greenfield site. Site can be delivered at early stage in plan process and conforms to sequential approach as identified in PPG3.</p>	<p>In considering the deliverability of sites identified in the urban capacity study the Council has entered into discussion with the House Builders Federation (HBF).</p> <p>The proposed density of identified sites will be reviewed in light of comments received through process of public consultation and consideration of urban design issues when the urban capacity study is revised. A revised version of the study will be placed on deposit with the local plan in Summer 2002.</p> <p>The draft development strategy allocates land for housing development (Policy PR1), including the allocation of greenfield land at New Barn Lane. Local plans need to identify sufficient land to meet the first 5 years of housing development proposed. Through the application of the plan, monitor and manage approach allocations will be reviewed and updated, taking into account the uptake of sites identified in the urban capacity study and windfall sites on previously developed and greenfield sites. It is therefore inappropriate at this time to allocate land for housing over and above Cheltenham's housing requirements.</p> <p>In assessing sites for development, the Council will apply sustainability principles, including application of the sequential test. Only when suitable sites within the urban area have been exhausted, will the Council consider the edge of urban area.</p> <p><b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O22</b></p> <p><b>Recommend</b> local plan will reflect findings of the urban capacity study.</p>
190		<p><b>Vision 21</b> Regrets downgrading of clear and specific commitment to sustainable development that runs through most of rest of review of local plan. Implied commitment by virtue of topic, but not until para 2.20 that mention of sustainable development made. V21 would like to see this principle established as a driver for considering Urban Capacity.</p>	<p>The urban capacity study is predominantly a technical paper which sets out the Council's approach to determining the potential for brownfield development over the plan period to 2011. Sustainability principles provide the basis of the report, reflecting the Government's objective of sustainability and the priority established by PPG3 to the reuse of previously developed land within the urban area. In identifying previously developed sites the urban capacity study has sought to be as robust as possible in considering sites which will meet Cheltenham's housing requirements over the plan period. The implementation of the plan, monitor and manage approach will be used to review the urban capacity study which may bring forward additional brownfield sites, or may require the Council to allocate additional greenfield sites.</p> <p>The allocation of a greenfield site for development in response to the shortfall in potential brownfield</p>

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		<p>Checklist in 2.19 is not, in our view, an adequate vehicle for assessing sustainability on its own, and additional and explicit focus of environmental protection and conservation of natural resources should be included.</p>	<p>sites identified by the urban capacity study was identified through the application of the sequential approach and assessed using sustainability criteria.</p> <p>The checklists provided in appendix 3 of the urban capacity study sought to broadly consider the character of the sites identified and provide a snap shot of accessible facilities and services. The checklist did not seek to provide a detailed sustainability statement.</p> <p><b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O22, O23</b></p> <p><b>Recommend</b> explicitly identify objective of sustainable development in revised urban capacity study.</p>
192	<p>1.9-1.15</p> <p>2.11</p> <p>2.20</p> <p>2.23-2.26</p>	<p><b>House Builders Federation</b> HBF and Borough Council have discussed methodology of urban capacity study and further discussion will also take place.</p> <p>In assessing the finding and methodology of capacity study HBF considers it essential that discounting is undertaken on rational and realistic grounds, through effective consultation with development industry to ensure that deliverability, availability and market factors are taken fully into account. HBF welcomes opportunities to comment.</p> <p>Welcome acknowledgement that borough council should take account of potential for non implementation in identifying sufficient housing supply within plan period.</p> <p>Welcome use of completion data in making allowances for trend based approaches.</p> <p>HBF has previously expressed concerns about threshold of 10 dwellings used as minimum threshold for inclusion of sites identified within study. HBF considers that reducing threshold to smaller level would reduce reliance within study on trend data offering greater certainty to study findings, reducing reliance upon trend based assumptions and increase emphasis of site on site specific elements.</p> <p>It essential that a robust and realistic discounting approach is undertaken by council. Advice in this regard has previously been given to council and will be further</p>	<p>On October 17 2001 Project Nexus met with members of the House Builders Federation to discuss the methodology and the findings of the urban capacity study. The comments outlined at this meeting will be taken into account when the urban capacity study is reviewed. This will be placed on deposit with the local plan during Summer 2002.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>The urban capacity study sought to distinguish between large sites, comprising 10 dwellings or more, and small sites, comprising less than 10 dwellings. This threshold was used to reflect the resources available to the Council in terms of survey work achievable, as such sites are easier to identify. It was felt that smaller sites would come forward via windfalls through the plan period. Any smaller sites which come forward through the consultation exercise will be taken into account in the review of the urban capacity study. By distinguishing between larger and smaller sites the study sought to provide a clearer projection of the type of sites which are likely to come forward based on trend data.</p> <p>Comments noted.</p>

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	<p>3.3-3.47</p> <p>3.48-3.52</p> <p>3.56-3.61</p>	<p>discussed.</p> <p>Welcome approach to ensure estimates based upon net dwellings gained to stock over plan period. However, HBF considers that reliance on relatively high threshold for site identification makes study rely almost entirely upon trend based data.</p> <p>In determining likely level of contribution to be achieved within plan period regard is necessary to following:</p> <ol style="list-style-type: none"> <li>1. Whether best and easiest sites to develop already been taken by market.</li> <li>2. Whether remaining opportunities likely to be in sensitive locations.</li> <li>3. The potential for ransom of sites to occur has been taken into account.</li> <li>4. Whether potential has been identified in lower market areas and extent to which cost of overcoming constraints such as access and ownership, have been taken into account.</li> <li>5. Whether local plan policy framework supports infill; suburban intensification; backlands development and inclusion of garage courts/large gardens for redevelopment.</li> </ol> <p>Such tests most reliably need to be undertaken on a site-based level, as such HBF considers that site size threshold needs to be reduced.</p> <p>Regard should also be had to assumption made by Gloucestershire Structure Plan regarding empty homes.</p> <p>HBF would welcome opportunity to discuss phasing and monitoring with borough council.</p>	<p>In identifying sites and providing projections of the potential supply of previously used land the urban capacity study has attempted to apply realistic assumptions in terms of future development, such as market conditions, changes in planning policy, increased densities and integrated development. In addition, sites identified in the study via comprehensive survey have been considered in terms of suitability within the context of the wider environment, and deliverability in terms of suitable access; appropriate densities; access to existing services and facilities; including the public transport network. Where additional sites are suggested through the process of public consultation, potential capacity will be considered on a site by site basis.</p> <p>The review of the urban capacity will take into account RPG10 which sets out a reduction in average vacancy rates to 3%.</p> <p>Comment noted.  <b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O22</b>  <b>Recommend</b> local plan will reflect findings of the urban capacity study.</p>
194	pg 11	<p><b>Mason Richards Planning (on behalf of Bovis Homes)</b> Generally support approach of Council on assessing urban capacity. In supporting general methodology applied, Bovis would encourage Council to ensure that an absolutely realistic assessment of potential sources of supply is carried out, especially if Council considers urban capacity to be principle source of new sites coming forward.</p> <p>Noted that Study based on both projections of past sources of supply and individual site work. Where projections been made of future capacity of large and small windfall sites, Bovis would caution on over ambitious assumptions being made.</p> <p>Assumptions made in respect of intensification of existing residential areas, changes of use,</p>	<p>The methodology adopted by the Council in the preparation of the urban capacity study has sought to be as robust as possible in assessing the potential supply of previously developed land over the plan period, including the application of realistic assumptions in the projection of trend data. In line with the governments approach to plan, monitor and manage, the study will be reviewed and adjusted accordingly taking into account development over the plan period assessed against the survey results of potential urban capacity to mid 2011. Review of the study may require sites phased for a later period of the plan to be brought forward, or sites pushed back to a later phase, should sites not previously identified which offer sustainable development solutions come forward through the plan period. In line with the provisions of PPG3 the presumption will be that previously developed</p>

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		<p>development of vacant and derelict non residential land and use of land previously used for employment are all assessed as making a substantial contribution to future land supply. It is considered that less generous allowance should be made in terms of each of these categories to ensure Structure Plan requirement fully met within Plan period. This will require further allocations to be considered.</p> <p>Table 2: Site 2: understood this is not now likely to be available for residential development</p> <p>Site 11: Bovis believe there are serious doubts as to whether this will come forward for development of a residential nature. Both sites should therefore be discounted from potential capacity.</p> <p>Identified shortfall of 258 dwellings (to be made up by allocation of Starvehall Farm) and doubts about availability of committed site at GCHQ Oakley highlight need to have further greenfield sites identified to absorb shortfall from urban capacity assessments.</p> <p>Recognised that Councils are encouraged by guidance to produce comprehensive Urban Capacity Studies which take an optimistic view of sources of supply, however this must be tempered by realism and that prime pre-requisite is requirement to meet Structure Plan housing targets.</p>	<p>sites should be developed before greenfield sites.</p> <p>Site 2 is currently occupied by Gloucestershire Constabulary. A large proportion of this site is expected to come forward following reorganisation of Gloucestershire's emergency services.</p> <p>Site 11 is currently used as a car park and is owned by Cheltenham Borough Council, this site offers the opportunity to bring forward a high density development in a sustainable location, close to services and facilities and the wider public transport network.</p> <p>Additional information provided by GCHQ, sets out that development at GCHQ Oakley will come forward over the plan period. This information will be updated in the review of the urban capacity study which will be placed on deposit with the local plan during Summer 2002. The urban capacity study identifies a shortfall in potential urban capacity to meet Cheltenham's housing requirements, and a potential need to release previously undeveloped land prior to 2006. The draft development strategy addresses these concerns by allocating 12.5 hectares of undeveloped land at Starvehall Farm to be developed within the first 5 years of the plan period.</p> <p>Comments noted. <b>Local plan objective O5, O6, O7, O9, O12, O13, O14, O22</b> <b>Recommend</b> local plan will reflect findings of the urban capacity study.</p>
213		<p><b>Highways Agency</b> Of identified sites, Agency considers that numbers 1-9 and 14 could have an impact upon A40, however believe that the following sites can be disregarded:</p> <p>Sites 7, 8, 9 which involve replacement of existing dwellings with new ones and hence will not generate much additional traffic. Sites 1,2, 5 which are sufficiently small and far enough away from A40 to have only a minor impact upon that route.</p>	<p>Comments noted. <b>Local plan objective O33, O34, O35, O36</b> <b>Recommend</b> the review of the local plan will require the submission of transport assessments alongside planning applications for major developments. Text will be revised to require development proposals which may generate additional traffic on the Trunk Road Network to prepare a traffic assessment on the impact of development.</p>

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		Thus Agency considers only sites 3, 4, and 6 are likely to be matter of concern. Agency's long term stance on these sites is dependant upon the de-trunking of the A40, however until de-trunking takes place, remain concerned about their impact on Trunk Road Network. Moreover, Agency believes this concern can only be addressed by production of full transport assessment of these sites, and until this has been produced (or A40 de-trunked) Agency must maintain this position.	
214		<b>Railtrack</b> No specific comments, however should reflect contents of Council's development brief for Cheltenham Spa Railway Station area and protect the development area identified in this document.	Comments noted. <b>Local plan objective O5, O6, O7, O22</b> <b>Recommend</b> revised urban capacity study will take into account development briefs prepared by the Council
229	1.7  2.4/2.5 & Table 1  2.14 Appendix 4	<b>Prestbury Parish Council</b> RPG only requires 50% of new built to be on brownfield sites. Government target is minimum of 60%. Presumed RPG will be corrected.  Have concerns that this section anticipates that where in a village environment, a single house on a large site is developed, then the density of properties erected will be not less than 30 per hectare. In most cases this would adversely affect environment of village. Request assurance that planning permission will ensure that number of houses to be on such a village site will not be based upon the minimum of 30 properties per hectare and also will not adversely change the characteristics of the location and surrounding properties.  Not clear how area as diverse as Prestbury Parish can sensibly be incorporated into any one of the categories defined in the character area approach/typical urban areas. See comment on Sources of Urban Capacity above.	RPG takes Government target and applies it at a regional level. Regional target takes into account the large percentage of rural areas within the South West.  In applying housing densities the Council is required to make the best use of land, reflecting provisions set out in PPG3. Increased densities must however be balance with the need to protect and enhance the quality of the built environment. Innovative design and layout can assist in making better use of land, the Council will require developers to incorporate urban design principles and illustrate how higher densities may be achieved.  Comments noted. <b>Local plan objective O2, O3, O5, O6, O7, O9, O11, O12, O13, O16, O22, O23</b> <b>Recommend</b> review urban capacity study. Consider findings of urban design framework.
239	3.56	7350 houses to be built by 2011. Given that 63.5% of this total have already either been built or have received a firm commitment to build, plus the fact that other windfall sites will emerge, why is planning department so hasty to identify sites in conservation areas. Once these sites are built on they are either severely damaged or damaged beyond recovery for ever.	Local plans need to identify sufficient land to meet the first 5 years of housing development. In applying the Government's principles of sustainable development, especially accommodating development on previously developed land, the Council must consider a wide range of issues, including the tightly drawn urban boundary of Cheltenham, accessibility to transport, jobs and services, impact upon the built and natural environment. Within conservation areas there are a number of opportunities for development of previously developed land, which with sensitive and high quality design may be incorporated successfully into the existing built form. <b>Local plan objective O2, O3, O5, O6, O7, O11, O12, O22, O23</b> <b>Recommend</b> amend local plan policies in



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			response to urban capacity study, Urban Design Framework and development briefs prepared for key sites within the town.
241		<p><b>Foxley Tagg Planning (on behalf of Wilcon Homes Western)</b> Assumptions made on proposed capacity of the source 'Intensification of Existing Residential Area' have to be questioned owing to reduction of proposed dwelling units at scheme currently under consideration for site 6. Consider therefore that capacity of this site to yield proposed number of dwellings may not in reality exist.</p> <p>Should not propose over restrictive policies with regard to subdivision of existing housing stock. Much of Cheltenham's housing stock comprises large regency villas totally unsuitable to needs of today's households. Every application for subdivision should be considered on its own merits.</p> <p>Proposed that brownfield land will provide sufficient sites to supply housing requirements. Commercial future of some identified sites uncertain which raises doubt over deliverability of proposed levels of housing within plan period. Conversely, other sites have not been identified in study that may become available for development within plan period.</p> <p>Concern about intention of Council to retain all existing employment sites in employment use. Considered that there are numerous potential housing sites currently in employment use. Change of these sites should be considered against sequential approach of PPG3.</p> <p>Allocation of at least one green field housing site is welcomed by Wilcon.</p> <p>Realistic to suggest that some of densities proposed may not be achievable. Will therefore be necessary to facilitate other development sites within plan period in addition to those identified.</p> <p>Major assumption been made concerning deliverability of sites and number of dwellings on these sites. Fair to suggest that level of greenfield land allocated for housing will be challenged through local plan process as it is unlikely that sufficient dwellings will be provided on brownfield land. More pragmatic approach should be taken to facilitating housing development on previously used land in order to achieve Structure Plan housing targets. Failure to do so will only result in</p>	<p>Site 6 deleted from urban capacity study following refusal of planning permission.</p> <p>In identifying sites and providing projections of the potential supply of previously used land the urban capacity study has attempted to apply realistic assumptions in terms of future development, such as market conditions, changes in planning policy, increased densities and integrated development. In addition, sites identified in the study via comprehensive survey have been considered in terms of suitability within the context of the wider environment, and deliverability in terms of suitable access; appropriate densities; access to existing services and facilities; including the public transport network. Where additional sites are suggested through the process of public consultation, potential capacity will be considered on a site by site basis.</p> <p>In line with the governments approach to plan, monitor and manage, the study will be reviewed and adjusted accordingly taking into account development over the plan period assessed against the survey results of potential urban capacity to mid 2011. Review of the study may require sites phased for a later period of the plan to be brought forward, or sites pushed back to a later phase, should sites not previously identified which offer sustainable development solutions come forward through the plan period. In line with the provisions of PPG3 the presumption will be that previously developed sites should be developed before greenfield sites.</p> <p>The urban capacity study has identified a shortfall in meeting Cheltenham's housing needs on brownfield sites. The Council has responded to this by allocating a greenfield site for development. It is inappropriate at this time to allocate land for housing over and above requirements set out in Gloucestershire Structure Plan which will preempt the plan, monitor and manage approach.</p> <p><b>Local plan objective O5, O6, O7, O9, O10, O11, O12, O13, O14, O15, O18, O22, O23</b>  <b>Recommend</b> amend local plan policies in response to urban capacity study, assessment of employment land.</p>

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		more greenfield sites being allocated at mid term review.	
272		Welcome fact that all new housing required can be provided either by windfalls or by brownfield sites (but foresee difficulties next time round). Welcome particularly the fact that no proposal is made to build on the 'Leckhampton White Land'.	Comments noted.
274	2.25	<p><b>Shoosmith Solicitors (on behalf of J. A. Pye Ltd.)</b> Borough Council's approach largely in line with that in published national guidance. Essential that in any study realistic assumptions are made about availability of sites, trends in provision from windfalls and attractiveness or otherwise of development opportunities as well as other factors. Study findings should also be scrutinised and tested with involvement of house building industry and others with local knowledge. At this stage we question whether the necessary testing has been undertaken and whether or not the sites identified can be brought forward with a degree of confidence.</p> <p>Not clear to what extent any effective discounting and testing of assumptions made has been undertaken or to what extent the necessary balancing exercise has been carried out in relation to the value of existing use of sites. Of concern is statement "sites which are identified as having particular constraints need not necessarily be discounted altogether." Incumbent on Authority to identify what measures can be undertaken to overcome constraints and therefore convince others that sites should not be discounted. This does not appear to have been assessed.</p> <p>Also submitted that the robustness of the Study should be tested through means other than the monitoring of Planning Applications (para 2.27 refers), before overall planning strategy settled.</p> <p>Not clear to what extent potential sources of urban capacity have been assessed against value of existing use of site. Eg, in Table 1 no reference made in relation to land and employment use and development of car parks to value of existing use and degree to which it may support economic base.</p> <p>Review of Urban Capacity Study welcome (para 2.28 refers) but no commitment to the</p>	<p>In preparing the urban capacity study the Council has consulted with the House Builders Federation. In identifying sites for development, the Council has sought to be as realistic as possible is considering whether they will be delivered within the plan period. The assumptions made will be assessed through the plan, monitor and manage approach.</p> <p>PPG3 sets out criteria which local authorities should consider in identifying land for development. This criteria together with local planning policy, site constraints, market conditions and officer knowledge have been used in applying assumptions and discounting.</p> <p>This statement reflects guidance set out in 'Tapping the Potential', and was taken into account in the preparation of the urban capacity study. Identified sites listed in the study are not subject to any constraints which would inhibit them coming forward through the plan period, measures to overcome constraints were therefore not required. Should such sites come forward in the review of the study, the Council will be explicit in identifying measures required to bring them forward.</p> <p>Comments noted.</p> <p>Agree. Review of study will address this.</p> <p>In adopting the plan, monitor and manage approach, the urban capacity will be reviewed annually.</p>

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		<p>necessary timescale for this other than a general statement of intent.</p> <p>Some of assumptions made regarding likelihood of both large and small windfalls emerging is of concern. Figures in Table 2 require careful analysis and justification beyond that which is offered in the draft report. Question whether such reliance on small windfalls is realistic at this stage. We consider allocation of other potential housing sites will be necessary to meet requirement.</p> <p>Not investigated in detail sites 1-14, but several seem to require relocation of existing uses and there does not appear to be any assessment of the consequences of such relocation or the potential for relocation. Of significant concern is relationship of residential land values to employment and recreation land values and the implications of this and increasing pressure to redevelop sites for housing without due consideration of existing use.</p>	<p>Projection of windfalls over the plan period have been derived from residential land availability data. In addition the Council has applied assumptions on the continued availability of sources. These assumptions and projections will be monitored through the plan period, and the urban capacity study amended accordingly.</p> <p>Comments noted.</p>
278	<p>2.14</p> <p>3.26</p> <p>3.43-3.47</p> <p>3.56, 3.57</p>	<p>Character Area Approach: categorisation should be consistent. Character Areas should have same meaning as the Character Areas referred to be other departments (eg Conservation officer), at the moment they do not.</p> <p>Subdivision of existing housing: one reason not mentioned for large reduction in number of properties being divided is ever increasing cost (mentioned in para 3.23 only). Also a problem with parking. Planning restrictions such as no parking provision in centre of town, combined with poor security in public car parks, means that people are not so keen to live in town. Some form of grant contribution scheme may encourage such projects [subdivision of existing housing] to be undertaken.</p> <p>Development of car parks: loss of car parks in town will be detrimental. Too much consideration given to park and ride for visitors with little thought for requirements of residents. Cost of using park and ride too high for a family, therefore cheaper to park in town. Forcing people to accept a more expensive alternative is not, in itself, acceptable.</p> <p>Study reasonably honestly admits proposal to construct 258 dwellings on greenbelt land - this is unacceptable. Proposal does not state whether this is to be on one or on a number of developments. This is bad enough but study</p>	<p>Agree.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Shortfall is addressed in draft development strategy which identifies land at Starvehall Farm for development. Review of urban capacity study will cross reference to this document.</p>

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	3.60	<p>vaguely states that after mid 2011 a further allocation of greenfield land may need to be made to help meet housing requirements.</p> <p>This paragraph is even sneakier as it ends by stating that prospective shortfall of 487 dwellings 'will require the allocation of previously undeveloped land', although it does go on to say 'and/or the advancement of other proposals currently assumed to occur post-2006'.</p> <p>Draft is an assault on green belt and greenfield land and seeks to turn whole borough into an urban sprawl. Also proposes that it should be adopted with many surveys and figures promised but not available. Transport and parking proposals appear to be heavily biased towards visitors.</p>	<p>This statement sets out how the Council needs to consider a potential shortfall in meeting the first 5 years of the plan period based on non implementation of a housing commitment at GCHQ Oakley.</p> <p>Comments noted.  <b>Local plan objective O5, O6, O7, O12, O13, O14, O15, O16, O18</b>  <b>Recommend</b> annual review of urban capacity study</p>
269		<p><b>Town Planning Consultancy (on behalf of B &amp; Q Ltd.)</b> B &amp; Q are currently supporting a proposal for one of their Warehouse stores on land at Grovefield Way. The site is both available and suitable for such development. Indeed extant planning permission for retail development already exists on the site and this should be considered over and above other sites. The use of the site for housing does not reflect the current proposals or extant planning permissions. According reference to the site in the urban capacity study as being suitable for housing is inappropriate at this time pending the consideration of the current retail proposal for the site.</p>	<p>It is recognised that planning permission exists on the site for retailing, and that its development for housing is unlikely to be pursued.  <b>Recommend</b> deleting the site from the Urban Capacity Study.</p>
280		<p><b>Town Planning Consultancy (on behalf of Chartwell Ltd.)</b> Land of Grovefield Way is included in Appendix 2 as a potential housing site, with a capacity for 100 dwellings. This site, however, has extant planning permissions for major food and non-food retail development and is subject to a live planning application for a B &amp; Q Warehouse DIY retail store, submitted at the beginning of October. There is no current planning application for residential development. Accordingly, we consider it inappropriate to regard the site as a potential element of housing capacity. Instead, it should be identified for retail development. On that basis, it should be deleted from Appendix 2 and the site plan (Site 3) should be excluded from the document.</p>	<p>It is recognised that planning permission exists on the site for retailing, and that its development for housing is unlikely to be pursued.  <b>Recommend</b> deleting the site from the Urban Capacity Study.</p>
282		<p>It is a necessary consequence of this point that 'Land in the Park' (i.e. the Benton &amp; Ireton site) be deleted completely from the schedule of land identified in the Urban Capacity Study as suitable and available for intensive development.</p>	<p>Comments noted.  <b>Local plan objective O5, O6, O7, O11, O12, O22</b>  <b>Recommend</b> removal of site from Urban Capacity Study and the Draft Development Strategy following refusal of planning application for redevelopment (ref 01/00181).</p>

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285	Table 1	<b>PARC</b> Wording in top box under "capacity source" implies building in every garden in Cheltenham and so flying in face of all good words about value of Regency townscape, value of open space etc. Please qualify emphasising sensitivities of conservation areas and listed buildings.	PPG3 requires local authorities to make the best use of land. The urban capacity study seeks to reflect this by identifying opportunities within the town to accommodate development on previously developed land. Development of such sites needs to take account of the context of the built and natural environment. Review of urban capacity study will consider whether constraints to development within Cheltenham need to be clarified.
	Table 1	7th box down under "capacity source" - we would seek specific protection for CHE Park campus playing fields and Bournside/St James School playing fields.	Comments noted.
	2.12	Appears to encourage anybody with a bit of space around their house to apply to develop it. Must be emphasised that policies of local plan that are there to protect town will apply to all developments and will often preclude development at any particular site.	See comments above.
	2.23	If one believes this para, how did Benton and Ireton get on list when constraints eg conservation area, listed building, green/open space and local plan policies ie at a minimum 4 out of 6 constraints, clearly apply? If this para is to mean anything then it must be stronger and applied properly, particularly to sites where these constraints are material.	Comments noted.
	3.6	Interesting to see Public Acceptability as a criterion. Does not normally seem to deter officers from recommending applications for development. Please include a mechanism for public acceptability to have due weight and be taken into account.	Comments noted.
	Table 2 Appendix 2 Appendix 3	Please remove Benton and Ireton.  Delete A22.	See ref. 282.
288	3.2	<b>English Heritage</b> The difficulties in upper floor conversion are acknowledged but a number of authorities in the SW have successfully mounted concerted efforts to exploit this important town centre resource.	Comments noted.
	Appendix 3	English Heritage does not have the resources to comment on the individual sites, but it welcomes the inclusion of historic environment information in the site checklists. The presence of listed buildings and scheduled monuments on or near the site may reduce the density of development. If the site is within a conservation area, the density is likely to be affected by that of the prevailing character.	
289		<b>Cotswold District Council</b> The UCS is	Comments noted.

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		<p>broadly in line with Government best practice guidance and appears to be fairly robust. The potential level of development located on brownfield land is supported and is very much in line with national guidance.</p> <p>Some further work may be required on the UCS to test the commercial viability of the sites, it is possible that consultation on the study will give some feedback with regard to viability. Further work on the commercial viability of the sites could also help to inform policy on release/phasing of the sites.</p> <p>Ownership is another issue fast emerging with UCSs. The owner(s) of the sites should be established and contacted to ensure that they are willing to see the sites developed before they are included in the first draft of the plan.</p>	
290	2.19	<p><b>Cyclists Touring Club</b> We welcome the mention of the Government's Planning Policy Guidance PPG3, with reference to location and accessibility of potential development sites. As far as the specific sites are concerned, we note that each site includes accessibility by cycle as one of the criteria. At the stage when specific proposals for each site are considered, we trust that potential extensions and improvements to the cycle network will be taken into account, and vice versa.</p>	Comments noted.
291	3.60	<p><b>Leckhampton Green Land Action Group</b> Strongly welcome result of capacity study. Note possibility of shortfall should proposed provision at GCHQ Oakley be delayed. In this eventuality, strongly urge that, to avoid unnecessary or premature use of greenfield land, shortfall should be carried forward into second half of plan period.</p> <p>Proposal: delete the words 'the allocation of previously undeveloped land and/or' Reason: contrary to sequential approach advocated in PPG3 that greenfield land should be developed merely to meet an arbitrary date line.</p>	<p>Comments noted.</p> <p>Paragraph 34 of PPG3 requires development plans to identify the first 5 years of housing development. The Council will need to make provision for development of greenfield sites to accommodate shortfalls in requirements. <b>Local plan objective O5, O6, O7, O22</b> <b>Recommend</b> review of urban capacity study</p>
292	1.14	<p><b>Gloucestershire County Council</b> Support fact that Cheltenham's housing requirement can be accommodated on brownfield sites in urban area.</p> <p>Refers to taking account of expired planning permissions. This is not acceptable. DTLR HQ have advised that there is no basis for this. Consequently, allowance of 250 dwellings included for expired planning permissions should not be included. In para 1.15 therefore borough council should be seeking to grant planning permission for 250</p>	<p>In realistically assessing housing requirements over the plan period the Council consider that recognition that dwellings may not come forward due to expiries of planning consent assists in bringing forward a robust assessment of urban capacity.</p>

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		<p>less dwellings, ie 2415. Original draft of UCS included two paras which referred to phase 2 of the study. Although it is appreciated that phase 2 will be dealt with separately, it would be useful to see a reference to its intent here for further work and also its role in respect of subsequent studies.</p> <p>Schedule of sites:            Grovefield Way - adjacent to area of Iron Age occupation: archaeological field evaluation will be required.            Moorend Road - adjacent to area of Roman activity; archaeological evaluation may be required.            St Margaret's Road - on edge of medieval borough; archaeological evaluation will be required.            Portland Street - on edge of medieval borough; archaeological evaluation will be required.            Albion Street/Gloucester Place - on edge of medieval borough; archaeological evaluation will be required.</p>	<p>Comments noted.</p>
294	<p>Table 2 map4</p> <p>Table 2 maps 10 &amp; 11</p> <p>Table 2 map 14</p> <p>Appendix 3</p>	<p>Map out of date. Does not indicate new road from new traffic light controlled junction northwards from A40, therefore not possible to appreciate how adjacent development will be accessed.</p> <p>Wholesale and permanent elimination of car parking until alternative means are established is shortsighted and will isolate town centre.</p> <p>Isn't this land now being used for commercial building? Appendix 2 identifies this as part previously and part undeveloped. Where is/was undeveloped land?</p> <p>Site details indicate presence of on-street parking but make no reference to off-street parking. What does answer 'fair/no' mean in relation to 'high incidence of on-street parking'? Difficult to see what is existing and what is proposed in site details.</p>	<p>Comments noted</p> <p>Comments noted.</p> <p>No. Site part of a larger area. Part of land formerly used as a playing field.</p> <p>Off street car parking would be developed as part of any future development. As such availability cannot be assessed at this stage.</p> <p>Difficulties in consideration of site checklists noted. Review of urban capacity study will seek to address these concerns.</p>
295/304	<p>2.14</p> <p>3.26</p> <p>3.43-3.47</p>	<p><b>Swindon Parish Council</b> Categorisation of 'Character Areas' should be consistent across planning departments, at moment it is not.</p> <p>One reason not mentioned for large reduction in number of properties being divided is cost. Also problem with parking. Some form of grant contribution scheme may encourage such projects to be undertaken.</p> <p>Loss of car parks in town will be detrimental. Park and Ride too expensive for family. Forcing people to accept a more expensive</p>	<p>See ref. 278</p> <p>See ref. 278</p> <p>See ref. 278</p>

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		alternative is not, in itself, acceptable.	
	3.56	Admits there is a proposal to construct 258 dwellings on green belt land - unacceptable. Proposal does not state whether this is to be on one or on a number of developments.	See ref. 278
	3.57	Vaguely suggests further allocation of greenfield land may need to be made post 2011. Looking even further ahead future for greenbelt and greenfield land looks dire.	See ref. 278
	Appendix 3	What does 'fair/no' mean in relation to 'high incidence of on-street parking'? Difficult to sort out what is existing and what is proposed in site details.	See ref. 294.
	Table 2 map 4	Map out of date, does not indicate new road from new traffic light controlled junction northwards from A40. Not therefore possible to appreciate how adjacent development will be accessed.	See ref. 294.
	Table 2 maps 10&11	Wholesale and permanent elimination of car parking until alternative means established is shortsighted and will isolate town centre.	Comments noted.
	Table 2 map 14	Isn't this land now being used for commercial building? Appdx 2 identifies this as part previously developed and part undeveloped. Where is/was undeveloped land?	See ref. 294.
299		<b>RPS Chapman Warren (on behalf of Redrow Homes South West Ltd.)</b> Redrow supports in principle objective of achieving as much development as possible on previously developed land. However, also consider that urban capacity studies must be robust and reliable to deliver what they promise.	Agree.
	2.13	Not clear whether period 1991-2000 is basis for lower or higher range of projected figures. In any event unwise to use such a short period as it could produce unreliable results.	The urban capacity study provided 2 projections to provide a higher and lower range. This reflected changes to policy HS73. It was considered important that this change and impact on development brought forward should be taken into account.
	2.10	Criteria listed here recognised as those contained in para 31 of PPG3. Considered that first of these is most important as unless this criterion met, none of others are relevant. Para 31 implies that by definition these criteria apply to sites which have been identified.	Comments noted.
	2.22	Illustrates potential problem in local plan preparation. Ideally design led approach should be carried out before a first deposit local plan issued.	Comments noted.
	2.26	Factors outlined here are acknowledged,	Comments noted.



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		however this should not lead to excessive reliance being placed on previously developed land.	
	2.29	Approve intention to place revised UCS on deposit with local plan. However, as indicated in para 2.22 above, council should itself be taking an active approach to refine the capacity figures through the design led approach.	Urban capacity study will be reviewed and placed on deposit with the local plan during Summer 2002.
	2.27	Robustness of capacity study should be tested, however a more neutral stance to the outcome of testing should be adopted.	Council has consulted with the House Builders Federation on the methodology of study. These comments, together with other comments received via public consultation of key issue papers will be taken into account when the urban capacity study is approved.
	Table 2	Concern about extent to which potential capacity consists of unidentified sites. Also concerned about reliance on sites currently in employment use.	Comments noted.
	3.40	Strongly endorse first sentence, rest of para noted.	Comments noted.
	3.41	Describes what appears to be happening in many parts of country - overwhelming emphasis on extent to which housing needs can be satisfied on previously developed land, without sufficient regard for need to protect jobs and employment land. Especially important in Cheltenham given acknowledged shortage of land.	Comments noted.
	3.43-3.47	Need to be much clearer about likely impact on vitality and viability of town centre of redevelopment of car parks.	Comments noted.
	3.55	Consider that it would be more appropriate to depict all proposed allocations on Proposals Map for whole plan period in order to create greater certainty for housing provision not only in Cheltenham but also in Tewkesbury borough.	Comments noted.
		Consider it inappropriate to introduce question of availability of land at GCHQ Oakley so late in UCS - means some of unidentified site capacity in UCS could be regarded as less reliable.	Comments noted.
	3.58-5.60	Potential difficulties raised considered to be serious. In our opinion, question of how land supply is to be effectively maintained throughout the plan period must be addressed in much more detail in the UCS to carry conviction.	Comments noted.
303		Site plans 7, 8, 9: surely a windfall opportunity	Comments noted.

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		<p>to fulfil an extensive group of aims, keep housing losses to a minimum. Hesters Way was a model housing estate, but it has been disgracefully used in the interval. Surely council have learnt that people make the slums when they do not relate to their environment. I am familiar with all types of housing on Hesters Way and it is all spacious and eminently re-furbishable. There is a strong nucleus of caring and supportive tenants left who deserve more support from their caring, environmentally aware council.</p>	

## URBAN DESIGN FRAMEWORK

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
3		Innovative buildings? Please do not let a developer scar our town again like they have with Century Court. Now that people have moved in it looks even worse with their mish-mash of balcony furniture. And don't let them take the trees down either or it will look even worse.	<p>The local plan recognises that the Regency architecture of Cheltenham is a major asset to the town; however modern/innovative building design may be appropriate in certain locations. Century Court has been cited by English Heritage and the Commission for Architecture and the Built Environment as architecture of quality which 'relates closely to historic models while being unequivocally modern in idiom.'</p> <p>Trees are important features within the town of and add to the quality of the built environment.</p> <p><b>Local plan objectives O2, O11, O12, O23</b>  <b>Recommend</b> amend local plan polices to reflect urban design principles. Where appropriate the Council will consider advice from design groups when considering proposals for development, e.g. the Commission for Architecture and the Built Environment, English Heritage, the Architects' Panel and Cheltenham Civic Society.</p> <p>The local plan will reflect the emerging 'Urban Trees Strategy' which outlines the planting and management of trees within the town. Policies will be strengthened to secure the town's green environment, including trees.</p>
95		I think Cheltenham is a pleasant place to live. if the urban design consultant you have appointed can find sensible ways of implementing the main ideas outlined in 'a vision for the future', then I think life will become better still for residents and visitors.	Comments noted.
108		<p>A strong continental feel, 'café society.' Wouldn't it be more appropriate to have 'a strong Regency feel'? Café Society, that does sound up market, even snobby (I hate coffee and tea!).</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	<p>By reflecting urban design issues set out in the urban design framework, the local plan seeks to create a town with a 'high quality shopping and tourist centre, a town centre full of vitality, with an attractive pedestrian friendly environment and ambience'. This would not preclude a 'strong Regency feel'.</p> <p><b>Local plan objectives O24, O25</b>  <b>Recommend</b> amend local plan polices to reflect urban design principles.</p>
127	4.1  Plan 7	<p><b>Leckhampton Parish Council</b> 'The town within the countryside'. We wish to support the approach outlined in the section, pointing out that the green areas of Leckhampton form an important part of the circumference of the town.</p> <p>We suggest that the figures for traffic flows be brought up to date. Those for 1999 are now available, and are significantly higher than the 1997 ones quoted. Those for 2000 would no doubt be higher still.</p>	<p>Comments noted.</p> <p><b>Local plan objectives O9, O10, O12</b></p> <p>Plan extracted from the Cheltenham Transport Plan. This plan has now been updated illustrating most recent traffic flow information (1999).  <b>Recommend</b> plan 7 is updated.</p>
170		<b>Pittville Area Residents Association</b> Concerns regarding inappropriate development. Need for high quality urban design.	<p>Comments noted.</p> <p><b>Local plan objectives O2, O11</b>  <b>Recommend</b> amend local plan polices to reflect urban design principles. Where appropriate the</p>

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			Council will take account of advice from design groups when considering proposals for development, e.g. the Commission for Architecture and the Built Environment, English Heritage, the Architects' Panel and Cheltenham Civic Society.
182		<p><b>Cheltenham Cycle Campaign</b> Impressed by proposals to extend brief set out in 'Our town, our future' and provide further guidance for planning and development processes. Included is a welcome overall thrust for transport measures to reduce reliance on private cars and promote more integrated and mixed mode use. However, not convinced framework adequately recognises problem of cyclists being a) squeezed between pedestrianised centre and inner ring road and b) deprived of good cross town routes. From cyclist's perspective, seems to be well intentioned framework marred by lack of real experience and knowledge of cycling issues, including important distinction between cycling facilities and general measures.</p>	<p>The Urban Design Framework has significant potential to create improved conditions for cyclists in the town centre. By shifting the focus towards pedestrians and public transport and by implementing traffic management measures to exclude through traffic it will be possible to create quieter streets which are safer for cyclists.</p> <p>One of the implications of this approach is that it reduces the need for cycle-specific facilities. These can be difficult to accommodate sympathetically into the street scene within the conservation area.</p> <p>It is agreed that in developing proposals for the town centre the council will need to ensure that cyclists are not marginalised.</p> <p><b>Local plan objectives O34, O35</b>  <b>Recommend</b> principles set out in the Urban Design Framework will be set within the context of the Cheltenham Transport Plan which seeks to improve the cycling network within the town, including the provision of cycle car parking and security and safety measures, creating conditions which offer cyclists attractive routes across the town centre. Other aids for cyclists could include joint use of bus lanes, where it is safe to do so.</p>
188		<p><b>Cheltenham Civic Society</b> Latham Report is already out of date (St James and St Margaret's areas). We presume it will be revised but we support its general messages.</p>	Comments noted. Urban Design Framework will be updated and published as draft supplementary planning guidance with the draft deposit of the local plan.
190		<p><b>Vision 21</b> Welcome this document as an important addition to conceptual framework for considering development issues in Cheltenham. It wholly embraces wide definition of sustainability and puts quality of town for people at its heart. It is balanced and realistic description of many of issues and challenges facing town.</p>	Comments noted.
194		<p><b>Mason Richards Planning (on behalf of Bovis Homes)</b> Generally support work done on producing framework for town. However, draft strategy considered to be deficient - total concentration on central part of urban area, particularly with regard to development sites. Some attention needs to be given to opportunities on urban fringes. Many of principles applicable to peripheral sites, particularly on southern edge of town - opportunities for mixed development.</p>	<p>Although the urban design framework has undertaken preliminary development studies within the town centre, the principles regarding creative re-use of land and buildings and the need to incorporate and protect features which are special and add value to the town, may be applied to the borough as a whole. The suitability of sites for development will be subject to the sequential approach and other PPG3 considerations.</p> <p><b>Local plan objectives O2, O6, O7, O9, O11, O12.</b>  <b>Recommend</b> local plan policies controlling the location of development have regard to PPG3, PPG 12, the Urban Design Framework, and the</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
			Urban Capacity Study.
214		<p><b>Railtrack</b> Welcome the various initiatives proposed in the document, however document fails to identify need for improved integration between town centre and railway station. Significant distance between station and town centre limits its accessibility by foot and framework should therefore promote improvement of cycle and bus links between the two areas. In addition, any designations on sites adjacent to railway lines and their subsequent development should be required to meet Railtrack's guidelines for schemes located adjoining or close to the network. These guidelines include use of appropriate fencing. Framework should also reflect contents of Development Brief to maintain a consistent approach to this area.</p>	<p>Opportunities for the location of new development which may take advantage of Cheltenham Spa Station as an interchange location are limited. To the east, west and south lie residential uses, to the north employment and residential uses. Opportunity for some limited development may come forward adjacent to the station, this is identified in the Cheltenham Spa Railway Station development brief and will be identified in the local plan.</p> <p><b>Local plan objectives O32, O35, O36.</b></p> <p><b>Recommend</b> Urban Design Framework considers accessibility of the town. Revision of this document will need to take into account the problems associated with the out of centre location of the train station and quality of environment which the station and its facilities provide. The Urban Design Framework will reflect provisions of the local plan review and Cheltenham Transport Plan in considering how integration of alternative transport modes, including walking, cycling and public transport can assist in improving links between the train station and the town centre.</p>
222		<p>The two worst pieces of architecture in Cheltenham are the 1960's Tesco/Wilkinson block in the High St and the Albion St shops lying alongside the cinema. The visibility of the rear of the Municipal Offices caused by the lack of a building facing Royal Well is another pressing problem.</p> <p>My suggested solution is for the Council to encourage as much development as is environmentally desirable to focus on the Brewery Site (perhaps to include the Municipal Offices) in order to increase the pressure on developers to redevelop the High St block along with the Brewery Site. If the Municipal Offices were vacated, hopefully the new owner would be less constrained in developing the land at the back.</p> <p>I propose that if the High St 60's block is redeveloped, the new building should be made to look like a series of individual buildings of different designs following the lines of the former burgage based plots. The land at the rear of the Municipal Offices should be developed as a slightly convex crescent to reflect the concave Royal Crescent and to make the project more viable by increasing the land area.</p>	<p>Comments noted.</p> <p>One of the aims of the Urban Design Framework is to set out design principles for the town. These principles take into account a number of factors including how buildings interact with each other, and the use of spaces by pedestrians and vehicles. These principles, together with the aims and objectives set out in development briefs, will be taken into account in the determination of future applications for the redevelopment of the Whitbread Brewery site. The future of the Municipal Offices will be considered by the Borough Council.</p>
224	3.2.3	<p><b>Environment Agency</b> Strongly support reference to important part that existing watercourse network plays in overall environment of Borough and its potential to be</p>	<p>The Council recognises the importance of the town's watercourse networks. The Council's intention is, following public consultation, to adopt the Urban Design Framework as supplementary</p>

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	<p>P24</p> <p>P33</p> <p>P34</p>	<p>expanded into a much more significant feature. These 'Parks' not only benefit to general public but also form jig-saw of wildlife habitats and associated movement corridors. Important these corridors are 'welded' together to provide a continuous link between town centre features and open countryside.</p> <p>Also need to establish 'development line' along corridor of Chelt to allow for continued implementation of flood alleviation scheme and access for future maintenance.</p> <p>Essential to ensure watercourses crossing or bordering new or re-development sites are protected and, where appropriate, enhanced. This will entail preservation of an open corridor along both banks, including any buffer zone required for retention of a viable wildlife habitat, opening up of culverted sections where practicable and retention of features of ecological and historic interest. In particular, this will apply to land at Gloucester Road, land at New Barn Lane, land off Grovefield Way, GCHQ Benhall, land at St George's St and land at Albion St.</p> <p>The Town within the Countryside: also important to bear in mind that underlying geological strata is predominantly Minor Aquifer with a high degree of vulnerability.</p> <p>Public Green Space: would stress their additional value as wildlife habitats and movement corridors.</p> <p>Town Centre Management: a concerted effort is required to minimise the creation of waste and segregate remainder for recycling.</p> <p>Also note that there is no representation of the watercourse network within the copious set of maps at end of document.</p>	<p>planning guidance. The Framework does not seek to reiterate the policies of the local plan which make provision for maintenance strips for watercourses (UI 119), protection of open spaces, landscape features and habitats (GE36-GE43, N58-NE61).</p> <p>Local plan policy UI119 applies.</p> <p>Where required the Council will prepare development briefs to set out what will be expected from development sites, including protection and enhancement of watercourses.</p> <p>Urban capacity checklists will be updated to reflect importance of watercourse.</p> <p>The Environment Agency provides advice on planning applications. <b>Local plan objectives O12, O16, O18 Recommend</b> The Council will consider whether local plan policies which seek to protect the natural environment are appropriate in terms of the level of protection afforded, and whether there are gaps in policy.</p> <p>The Council supports the Gloucestershire Waste Local Plan waste hierarchy (reduction - re-use - recovery – disposal) but this is not an urban design issue. Agree. <b>Recommend</b> that watercourses be added to one of existing plans in the Urban Design Framework, or an additional plan inserted.</p>
228		Fully support idea of an 'Urban Design Framework'.	Comments noted.
229	<p>P. 10</p> <p>P. 20</p> <p>P. 21</p>	<p><b>Prestbury Parish Council</b> Para 2.4.3: Prestbury and Swindon Village are included here as acting as precedents, CBC should not carry out or allow developments that would degrade these villages.</p> <p>Para 3.3.4: given English weather, doubt economic viability of closing streets at night for al fresco drinking and dining. Also confusing and dangerous for traffic. If need additional facilities consider use of Regent and Beechwood Arcades.</p> <p>Para 3.3.4: essential that buses, taxis and</p>	<p>One of the main functions of the Urban Design Framework is to secure the enhancement of existing character. Further work on character areas in the next year will support this process.</p> <p>This is a reasonable option for certain times of the year. A barrier system of closure, if carefully applied, can be flexible and need not be confusing or dangerous. The Arcades are generally closed in the evening and are not necessarily appropriate for the kind of facilities envisaged.</p> <p>The importance of accessibility is agreed. Bus</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	<p>P. 22</p> <p>P. 24</p> <p>P. 36</p>	<p>cycles have access to town centre. Bus terminuses should be located on periphery with town centre stops pick-up and set-down only.</p> <p>SWOT analysis: 'no major urban highway' given as both strength and weakness - illogical. Major urban highway passing through centre of Cheltenham or a village would be a disaster.</p> <p>No more sprawl: agree with this statement. Tewkesbury Borough should not increase sprawl by proposing development adjacent to Prestbury.</p> <p>Cross town traffic: undesirable, but need to enable drivers to get on to road home without having to increase traffic density by having to drive all round town. Current one-way system does not make it easy for short-term visitors. Direct east-west and north-south through routes are needed for cyclists.</p> <p><b>Dissenting views from Cllr Jo Grimster</b> Key Issues report: Issue 5 Transport - Demand Management, paras. 5.9, 5.10 and Issue 6 The Town Centre, paras 6.3 &amp; 6.11: At present, not a real problem with town centre parking so, if there has been a decline in town centre shopping (which is not altogether apparent) cannot have been caused by this. Other factors may be more significant, eg no. of food retail outlets.</p> <p>Latham's plan is that car parking levels should be maintained. The two multi-storeys in Albion Street will remain. Not always necessary to have a car nearby for storing purchases. Retailers could find that a delivery service could be a good selling point and shops are always willing to store items for collection later. Therefore do not believe that there is a conflict between parking and shopping. Even with bus service that we have, is possible to access town centre by bus from all areas of town. Visitors from outside Cheltenham should be catered for preferably by service buses or Park &amp; Ride. Propose therefore that first paragraph be omitted from Prestbury Parish Council response.</p> <p>Paras 6.11 &amp; 6.13: it is proposed to retain present multi-storey car parks in Albion St. Proposed comment therefore: a way will have to be found to accommodate cars accessing the car parks with the fact that they are situated on a buses only route.</p>	<p>terminuses are not always necessary, but good interchange points between bus routes and between buses and taxis are highly desirable.</p> <p>Urban highways can have advantages (in terms of legibility and accessibility), but also have disadvantages (generation of traffic and environmental damage). In Cheltenham, the townscape and environmental impact would be of particular concern.</p> <p>Comment noted.</p> <p>Comments noted.</p> <p>There has been not so much a decline in town centre shopping as a change in its nature. One of the main causes has been the transfer of some products, esp. food and bulkier goods, to out of centre locations.</p> <p>The Council's Transport Plan envisages that the level of off-street parking in the town centre will be about 3,300 spaces, and that these will be for short stay parking. They will be augmented by on-street parking and by Park and Ride. Bus accessibility will also be maintained.</p> <p>Agreed.</p>

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
	P. 20	Para 3.3.4: al fresco should be encouraged with an end to exorbitant charges for putting tables/chairs on the street. Safety problems can be easily addressed by having gated roads as in Chinatown London and Leicester Square. Comment: al fresco yes - possibly gated roads where necessary. Idea of opening up Arcades in evening is an interesting one and not one that has occurred to me before. Would be good to use these otherwise deserted spaces although issues of security would need to be addressed.	Comments noted.
239		<p>Maps 1-23 in urban design study are of very poor quality.</p> <p>Latham's outline proposals for town centre, old brewery and vicinal development uninspired. Mixture of accommodation plus concentration of small and medium sized private shops might work. Suggest design of this area be thrown open to architectural competition.</p>	<p>Comments noted. This is a function of the costs of reproduction. The quality of the published document was considered adequate for an interim document.</p> <p>Urban Design Framework visualises the Government's approach to sustainable development, including high density, mixed uses, permeability within the site and to the wider area. The illustrations in the Framework are intended to illustrate how urban design principles may be incorporated into development proposals, and are not meant to be architectural solutions.  <b>Local plan objectives O2, O4, O6, O7, O11, O19, O20, O22, O23, O24.</b>  <b>Recommend</b> revised Urban Design Framework will be placed on deposit with local plan during Summer 2002.</p>
240		<p><b>Cheltenham Conservation Area Advisory Panel</b> Appointment of an urban designer is a major step towards a coherent and comprehensive development plan which should not be inhibited by what can become legal restrictions, and should enable development of town for benefit of community, taking into account contemporary social expectations and changing modes of work and life.</p>	Comments noted.
275		<p><b>Stagecoach Wales &amp; West</b> Generally welcome this document and concept of developing a design vision for each area of town, but have some concerns over detailed proposals for public transport circulation.</p> <p>Section 3.3.4 Transport Strategy and Plan 10: while bus "rings" can be an effective way of serving large area, proposed ring for centre of Cheltenham not appropriate. Albion St, Bath Rd and Oriol Rd do not experience high pedestrian flows, and do not appear to be traffic objectives for public transport users. It would appear that most effective way in which buses can serve centre of Cheltenham is on a south-west to north-east axis, incorporating Royal Well Rd, Clarence St, North St and Pittville St. Access to this axis should be limited to priority vehicles comprising buses,</p>	<p>Comments noted.</p> <p>The comments on the proposed bus ring are noted. The Council agrees the advantages of cross-town routes.  <b>Recommend</b> further consideration be given to bus routes in the town centre in further developing the town centre strategy.</p>



Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
		<p>cyclists and emergency vehicles during shopping hours. Buses would serve this axis in both directions (northbound via Royal Well Rd, Clarence St, North St and southbound via Pittville St, Promenade [Boots Corner to Imperial Circus], Imperial Circus to Royal Well Rd).</p> <p>This axis would appear to grant highest levels of access to key central areas, and allows bus routes to congregate closely together permitting interchange between routes. It is envisaged that town buses would serve stops located in linear fasion along Royal Well Road, North St, Clarence St and Pittville St, with country services stopping in the Royal Well area.</p> <p>Disadvantage of a circuit is that much time would be wasted travelling along parts of the ring which would yield few passengers. This additional time would discourage bus passengers and consume resources which could be used more effectively in strengthening links along key corridors. In addition, a circuit prevents cross town services, since in order to serve all points the bus will by definition complete the circuit at the same location at which it joined. The number of amenities located away from the town centre (eg hospital, racecourse, railway station) tends to suggest some benefit would arise from cross town routes.</p> <p>As a result, we would not support the inclusion of a bus ring as identified in Plan 10, but would seek to encourage public transport development along a priority corridor encompassing Royal Well Rd, Clarence St, North St, Pittville St, Promenade and Imperial Circus.</p>	
278		<p>Proposes "gateways" to town and totally ignores character of areas into which it proposes these "gateways" be constructed. Latham proposal is not a solution to the poor planning of Tewkesbury Road and is only concerned with providing a front for visitors and is not interested in the impact of the proposals on residents, on traffic management in the area, or of the impact on the area as a whole. Importance of a scheme to deal with this problem as well as providing an aesthetically pleasing approach should be given more than a few lines and frivolous suggestions - detailed report with proposals required for public consultation.</p> <p>Draft plan has many areas that are incomplete and lacking in data necessary to enable draft</p>	<p>The Urban Design Framework sets out principles rather than specific schemes. The 'gateway' concept addresses only the edge of town – any proposal would need to reflect the character of the area to which it relates. The proposals for Tewkesbury Road are intended to help a general enhancement of the road, which would benefit residents as much as travellers. Implementation of any proposals, through the development control process or by Council initiative, would require further, careful consideration.</p> <p>The revised and complete local plan will be placed on deposit in 2002. It will be supported by</p>

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		<p>to be fully considered. Further draft required before it progresses to approved status. Intention appears to be that each document should stand as it is rather than a cohesive document being put together - recipe for creating problems and allows for interpreting of rules to suit the case.</p> <p>Swindon Parish area has many problems and every section of this document ignores them. None of proposals (Manor Farm, 3 storey "gateway", NWDR) will benefit parish and all will have a detrimental effect. Impact of proposed developments of Indalex site also ignored. Present traffic problems can only get worse if any one of these proposals is to proceed. Document shows no interest in village or wellbeing or views of residents.</p>	<p>additional documents, also revised, such as the Urban Capacity Study and the Urban Design Framework. There will be no conflict between these documents.</p> <p>The plan seeks to address issues confronting Cheltenham as a whole.</p>
283		<p><b>Cheltenham Friends of the Earth</b> Support much that Urban Design Framework aims to achieve but very disappointed that, despite feedback during public meetings, it does not adequately address environmental impact of buildings and need to ensure higher levels of energy efficiency and environmental performance in future. Would support specific design advice on this.</p>	<p>In general, the environmental impact of buildings is controlled by the Building Regulations and is not an urban design matter, except perhaps in cases where insulation or other energy or water efficient installations affect the external appearance of a building. The Council is in the process of publishing guidance on sustainable development.</p> <p><b>Recommend</b> the Local Plan encourages the construction of more sustainable buildings.</p>
287	4.1	<p><b>CPRE</b> Welcome what UD framework has to say on p. 24, section 4.1. Consultants have made a good job of describing features of town in context of its setting and their proposals for action are well worth serious consideration. This section must not be forgotten when pressures mount for further expansion of built environment into surrounding green open spaces.</p>	<p>Comments noted.</p>
288		<p><b>English Heritage</b> English Heritage welcomes the preparation of this document. The document provides a good basis for the creation of a robust but straightforward set of historic environment policies. It is of course essential that strong policies are properly implemented and sufficient resources should be allocated to control and implementation.</p> <p>English Heritage supports the individual action points but is aware that they will require considerable resources to take forward. If resources limit development in some areas of work it is important that this does not delay the development of basic urban design policies. It is better to have some good basic design policies in place than a lot of useful research that is too late to inform the local plan process.</p>	<p>Comments noted.</p>
290		<p><b>Cyclists Touring Club</b> Having attended the seminar hosted by Derek Latham Associates and visited the exhibition in the Regent Arcade, it is clear that great importance is</p>	<p>Comments noted. The Framework generally sets out principles as a basis for further action, and cannot provide fully worked schemes. Where more detailed information is available, it can be</p>

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		attached to this particular issue. As with other aspects of the local plan, the approach is positive as far as cyclists are concerned. It tends to be more general than some of the council's own reports, and in several places tends to assume that cyclists and walkers can be catered for together, e.g. para 5.12, proposed pedestrian and cycle priority, could be expanded before the framework is adopted as supplementary planning guidance.	included in the revised document. However, the process of implementing the Framework and the Transport Plan will take a number of years.
291		<p><b>Leckhampton Green Land Action Group</b> Strongly support important observations regarding peripheral areas of town, particularly those in para 4.1 re sprawl, attractiveness of the countryside, attractive approach and maintaining vistas along streets. Proposal: actions recommended at end of para 4.1 should be taken and reflected in the Local Plan.</p> <p>Plan 7 Existing Road Network: figures used are out of date. Replace 1997 figures with figures published in 2000 wherever they occur in the draft document. (Copy of later traffic flow map enclosed with comment.)</p>	<p>Comments noted. The local plan review will seek to reflect the Urban Design Framework, although the further work suggested by the actions under 4.1 can only be undertaken if resources become available.</p> <p>Plan extracted from the Cheltenham Transport Plan. This plan has now been updated illustrating most recent traffic flow information (1999). <b>Recommend</b> plan 7 is updated.</p>
292		<p><b>Gloucestershire County Council</b> Document summarises historical development in looking at Current Urban Form (section 3) but displays very limited understanding of how historical development of the settlement has determined its form and character. Proposed character area approach (3.2.4) welcomed, but will need to incorporate analysis of historical development of town and impact of this on morphology of settlement.</p> <p>Section on Archaeology (5.2) underestimates potential within town centre - see comments on Key Issues above.</p> <p>Support improvement of pedestrian cycle and public transport accessibility. Some areas may cause confusion, eg Plan 2 illustrates a number of routes which would need to be assessed in light of LTP approved 5 yr plan. Similarly with Plans 9 &amp; 10. Not clear how this document relates to the Issues papers.</p>	<p>The Council, CABA and English Heritage will be funding further work on character assessment. This work will inform the Framework and subsequent work.</p> <p>Archaeology is primarily dealt with in the adopted local plan. However, the Framework can be amended to reflect the potential arising from redevelopment, which might in some cases affect the urban scene. <b>Recommend</b> Urban Design Framework be amended to reflect the archaeological potential of the town centre.</p> <p>The Framework seeks to address some of the issues raised in the Key Issues report and to establish principles. It is accepted that further detailed work is required to progress detailed proposals arising from both the Framework and the Transport Plan.</p>
294	2.4.4	Giving pedestrians priority means that they have to compete with something else. Not a completely relaxing atmosphere.	This does not necessarily mean that space is shared at all times. The existing 'pedestrianised' areas permit access by service vehicles only at certain hours, and provide a better environment for pedestrians where alternative access for servicing is not available.

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303	P. 15	Re - deterring through traffic, catering for traffic which has a destination there and associated actions: having tried to leave Cheltenham for the day and found no buses left, this is surely the shape of things to come with residents doomed to incarceration.	These points are separate. The point is being made that Cheltenham roads need and should not accommodate traffic which is merely passing through. The Framework and the Council would support the provision of frequent and reliable bus and coach services connecting Cheltenham with other parts of Gloucestershire and the country. However, these are deregulated services, over which the Council has very limited influence.
	P. 34	"the coming and going of people night and day": would be entirely reliant upon the car, which I understand is to be discouraged. Plan 2: envisages using Moorend Park Road as a secondary route into the centre - have they ever looked at it? Entirely unsuitable because of current design and level of usage.	Other modes of transport are also available – buses including park and ride, cycles, walking.  The plan reflects the existing pattern of traffic movement between Leckhampton, Shurdington Road, The Park and the town centre. It does not imply the introduction of new measures to increase vehicular capacity and use of Moorend Park Road.
304		'Cheltenham Spa' everything - not always correct.	<b>Recommend</b> the term Cheltenham Spa be used only where appropriate.
	3.2.1	Incorrect to say that there is no difference between a small town and a large city. In Cheltenham roads have to be accessible to most forms of transport and cannot be divided. Little opportunity for route segregation. Proposal to consider routes for private vehicles after identifying routes for pedestrians, cyclists and public transport is an approach easier to adopt and adapt in larger cities.	The Framework does not make the statement indicated. It is agreed that differences in scale do provide different opportunities for action.
	3.3.4	Creation of cul de sacs with 'gated' junctions is a fine principle, but in Cheltenham creating such streets along a main route would sever any possibility of forming alternative routes at times of difficulty.	Such cul-de-sacs would only be possible on roads which do not have a primary distribution function, i.e. local access roads. Provision must always be made for emergency services.
	4.1	Agree that town must sprawl no further and definition between urban and rural, hard and soft, built and unbuilt must be maintained.	Comment noted.
	4.3	After comments made under para 4.1 proposals of this section are disappointing. Suggestions heavily biased towards visitors and to enhancement of character of the town. Proposal to construct 'gateways' totally ignores character of areas into which they will go. Proposal is not the solution. This area (Tewkesbury Road) has many problems and they all need to be considered to produce a complete solution. To deal with this effectively requires a detailed report of its own with proposals provided for public consultation. The commercial estate that bounds Tewkesbury Road conceals one of Cheltenham's most ignored gems, the village of Swindon.	A more detailed assessment of Tewkesbury Road has been prepared. Its proposals are intended to help a general enhancement of the road, which would benefit residents as much as visitors.

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	4.4	Any commitment to maintenance (footways, street furniture etc) must be backed with adequate funds.	Comment noted.
	4.5	Agree with action point to involve residents/occupiers.	Comment noted.
	4.6	Good to see that consultant has identified need to look beyond town when considering attractions Cheltenham has to offer.	Comment noted.
	4.7	Agree with points raised but limits itself to town as a shopping area. Many people also visit out of town retail parks and they must be included in any proposals. Current design discourages pedestrians from walking between the units (units round perimeter, car park in middle). They lack cohesion and are not pleasant places to shop. Could certainly be improved and must be included in any analysis.	Agree with the points made.
	4.8	Proposals of this section surprise me. Visitors and clients to an office prefer to be able to drive in and park conveniently close. Proposals border on the 'Noddy train' solution and are unacceptable. People might wish to live in a location convenient for work and for pleasure, but the reality is that many people live considerable distances away.	It is accepted that offices and other businesses often need an element of operational parking which can be used for clients and servicing, but many trips are not essential by car and can be achieved by other means – bus, taxi, park and ride – that don't involve bringing cars into the town centre. This helps to reduce congestion and maintain a better atmosphere.
	4.10	Cycling in or through parks is dangerous and practice must stop. No points raised concerning accommodation of activities such as roller blading and skateboarding, an increasing menace in most towns. It is also missing from paras 4.9 and 4.10. It is a problem that needs to be controlled.  Cycling must be discouraged where pedestrians area encouraged to wander in 'pedestrianised' zones. Vehicular routes temporary or otherwise should not be allowed to bisect pedestrian areas, other than for emergency vehicles.  Concluding comments Document mentions in part outer areas of borough but in end fails to take into account whole of Cheltenham. Underlines piecemeal approach council has chosen to take in its current strategy. Areas outside the town	The Urban Design Framework recognises the key role of cycling in creating a town which is more people orientated. The provision of safer routes for cyclists helps to boost cycle use, particularly where they are safer and more attractive. Cycle routes through parks contribute to this, although they do not imply that cycling elsewhere in parks is acceptable. The Council's approach is advocated by the DTLR, the Cyclist's Touring Club and the Institute of Highways and Transportation, which recognise the need to ensure that cycle schemes promote the safety of all, including pedestrians.  This is agreed. Cyclists are required to dismount in pedestrianised areas. In some cases, vehicles need access to pedestrianised areas for servicing for which there is no alternative – but only at off-peak times.  The Framework is intended to set principles for the whole of Cheltenham, although it focuses on those areas, mainly in the town centre, where the most change is likely to occur. Further detailed work will be undertaken on character areas throughout the town and on the main approach roads will help to develop the general principles for areas outside the town centre.



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		<p>town in England" - an affront to the most complete surviving Regency town.</p>	<p>substance and character of the Regency town.</p>
	1.2	<p>Guide needs to refer more knowledgeably to established Local Plan strategies and policies. At present should be no more than a discussion document and cannot be candidate for SPG status.</p>	<p>This is agreed, but will be more easily achieved in conjunction with the First Deposit of the Local Plan review.</p>
	2.1	<p>Delete assertion that Cheltenham facing "unprecedented period of change". Do not know yet whether Cheltenham to be 'densified' or expanded.</p>	<p>The statement is that 'towns and cities throughout Britain are facing an unprecedented period of change'. It is agreed the position is not unprecedented, but towns and cities are currently subject to major pressures (e.g. arising from sustainable development and the growth in traffic), from which Cheltenham is not immune. The accommodation of future growth is an key issue for the current review of the Structure Plan.</p>
	2.4	<p>Main mistake of many historic town is to "look to the future". Cheltenham derives little enhancement from any recent buildings. Town glorious because of amount of historical fabric still in existence.</p>	<p>All towns need to address 'the future' and the pressures they face. The solutions will vary. The town has been enhanced by many recent buildings, both Regency replica and modern, although it is accepted that some have also been less successful. It is agreed the principle attraction derives from the Regency architecture and townscape, although this is not always successful (e.g. the backs of many terraces).</p>
	2.4.3	<p>Delete blanket prescription to densify. Instead, state that any intensification must be subservient to:  a) local plan conservation and listed building policies, and  b) not be applied generally in those parts of Cheltenham Conservation Area lying outside Core Commercial Area.  Delete word 'Spa' where inappropriately included, eg 'Cheltenham Spa College'.</p>	<p>Whilst the points made are generally accepted, high density development on some sites is not incompatible with Regency character, and may be necessary to reflect it – Regency terraces usually fairly high density.</p> <p>Agreed.  <b>Recommend</b> Framework be amended.</p>
	2.4.5	<p>Promotion of "wider range of house type, size and tenure" inappropriate where character of area historically homogeneous. Needs to be deleted. Similarly, 'Core Commercial Area' needs to be what it says, predominantly commercial.</p>	<p>This statement reflects PPG3, which indicates that local authorities should aim for 'a better mix in the size, type and location of housing'. The framework specifically refers in this context to areas 'deserving improvement'. It is accepted that the character of localities must also be a consideration.</p>
	3.2.2	<p>Remove invitation to create new 'nodes'. Cheltenham has a 'Main Highway Network' defined as Plan 31 in local plan. Retrograde to form strategies based on fewer routes. Unwise to pack all 'modes' into same width-limited radial corridors.</p>	<p>Comment noted. The scope for change is limited by existing development and demand. The Cheltenham Transport Plan identifies a road hierarchy in Cheltenham. This envisages that capacity may need to be increased on some routes to make best use of the network and to provide bus and cycles lanes in appropriate locations.</p>

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	3.2.3	Definition of 'character areas' should be done in priority order of "those areas likely to experience most change".	Comment noted and will be considered when character area work is progressed.
	3.2.5	Because a site will not come up for redevelopment again does not mean it should be developed either densely or for mixed use. Need to identify examples of housing stock coming to end of its life. Only area of "unallocated" land in Leckhampton - delete this suggestion because contrary to Cheltenham Local Plan Inspector's Report. Only viable direction for expansion is to north west - indicate by name.	This is accepted, although best use should be made of available land within the context planning policies and the character of the locality. The process of renewal will be selective and is currently occurring in the Hesters Way/St. Mark's area. The Framework does not advocate the development of the unallocated land at Leckhampton, but clearly the future growth of the town needs to be addressed. The proper forum for this is the current review of the structure plan.
	3.3.6	Commissioning glib prescription for 'densification' seems like a canny investment for a developer-friendly administration.	Densification is one option for securing future development needs and may, in appropriate locations, not only help reduce the need for the development of greenfield sites but can bring vitality to residential areas. Low-rise solutions are likely to remain the most appropriate in many areas.
	3.4	All you can properly declare as objectives is to ameliorate Hesters Way, as far possible, seriously insist on quality in every small scale development, and avoid major clearance/densification experiments.	The Council strongly supports the issues (rather than objectives) set out in 3.4. They are compatible with the more limited points proposed.
	4.1	Cheltenham is a rare and precious low-rise large town - document needs to state and promote this.	Agreed. <b>Recommend</b> framework be amended.
	4.3	No overriding requirement to have P&R site on every radial route. Make this clear.	The Framework does not suggest this, although it is Council policy to seek park and ride sites on the 5 main radial roads. The Council recognises that there are environmental and operational issues to be considered.
	4.5	'Progressive classicism' would be more appropriate way of linking of Pittville and Montpellier than "modern spaces" and should be declared. Architects' lobby should not be allowed to set up an official "design panel" - would undermine remit of Conservation Area Panel.	'Modern spaces' does not necessarily imply modern architecture. Each proposal will be assessed on its merits and within its context and the views of CAAP and others will still be considered.
	4.6	Commercial activity should not be exported from Core Commercial Area onto sensitively located 'edge of town' P&R sites - delete this action.	What is proposed is only a delivery service which would contribute to reducing cars within the town and allow shoppers more time to enjoy the attractive environment.
	4.7	No need to "establish an office location policy" - already approved and adopted via last local plan inquiry. (Policy BE10).	And policy EM 70. These policies are consistent with PPG13 and are likely to remain substantially unchanged.
	4.9	Replace "consistency of quality" with "consistency of style".	Whilst consistency of style might be appropriate for street furniture, it is not so for shop fronts,



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			which need to reflect the diversity of buildings to which they relate.
	4.10	Should not be a P&R on every major route if that cannot be achieved, eg A46.	See response under para. 4.3 above.
	4.11	I suggested re-running a narrow open water channel down pedestrianised High St. High quality functional items (eg cycle racks) preferable to grade of 'public art' Cheltenham chooses.	Many ideas can be considered – the point is to enrich the public realm through a range of attractive and interesting works of art and other features.
	4.12	"iconographic modern building" must not be sited inside Conservation Area.	Perhaps the town now has this in GCHQ.
	5.1	Street names garbled.	Comment noted.
	5.3	Spell 'Sherborne' correctly.	Comment noted.
	5.5	'Vittoria' not 'Victoria'.	Comment noted.
	5.6	Acknowledge that northern relief road necessary evil.	Agree with sentiment, though not necessarily wording.
	5.13	'Inner Ring' via Hewlett Road would be too sharp-cornered for heavy vehicles it needs to carry and would also destroy a largely residential environment.	Comment noted. Further consideration being given to the management of traffic in the town centre.
	6.2	No requirement to introduce 'podia - alien to Conservation Area and visually unattractive.	The comment is noted, although modern development now has to cope with the car and the use of basements or semi-basements may be a less harmful way of achieving this. Each proposals should be considered in its context.
	6.3	Suggestion of "4 to 6 storeys" outrageous - Conservation Area cramming.	A carefully designed 6-storey building need not be out of place on a major and wide road frontage.
	6.4	Delete reference to "6 storeys". Unwise to specify residential percentage at this stage. Delete all mention of "podia".	See comments on paras 6.2 and 6.3 above. It is agreed that the percentage of housing needs to take account of a range of factors relating to a specific scheme and should be deleted.
	6.5	Delete premature invitation to create "retail" along Portland Street - likely to over-extend an already over extended Central Shopping Area.	Mixed use accords with PPG1. The Council has agreed to sell part of the site for the development of a new Magistrates' Court.
	6.6	"podium" of proposed height would be very destructive precedent for spaciouly laid-out town.	Perhaps less destructive than open car parking.
	6.7	Senseless and ill-informed to meddle with Brewery site. "30-50%" residential is idiotic and should be deleted.	It is accepted that this is not clear and does not reflect the existing planning permission, although the principle of securing residential within a mixed development should remain. <b>Recommend</b> Framework be amended.
	6.8	There should be no prescription that wide	In this context, taller building would help reduce

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		roads need tall buildings.	the visual severance caused by the construction of the road.
	6.9 & 6.12	Delete all mention of and commitment to "six storeys".	This is not agreed. It is appropriate to the scale of the road.
	6.16	No obvious townscape remedy for Tom Price Close.	Comment noted.
	6.18	This says that within Conservation Areas there will be "minimal change to overall density". Is consultant not aware that "case study" area he is trying to 'densify' lies entirely within Conservation Area.	Comment noted.
	7.8	Delete "identify growth zones for District Shopping Centres". Three of these in Cheltenham, all with defined perimeters which cannot be extended. Local plan policy RT85 is proper instrument for applying 'sequential' approach to retail location.	Agreed. <b>Recommend</b> Framework be amended.
	Plan 2	1. This 'too broad' plan should not erase valuable content of Plan 31 of Local Plan. 2. Shows obsolete street layout in Waitrose district - shoddy. 3. Farm Lane and Church Road (Leckhampton) cannot be designated as 'cross town distributor' routes. Farm Lane can never become a 'ring road' route as sketch plan implies. 4. Downgrading of PE Way curious when it is clearly functioning as 'western ring road'.	The two plans have different functions. Plan 2 is not intended to supplant plan 31 of the local plan. <b>Recommend</b> further consideration be given to the points made to ensure consistency with plan 31 of the local plan.
	Plan 3a/b	1. Coronation Square or Safeway (Up Hatherley) shopping centres must not be labelled as defective. Sited on major circular routes and easily reached by public transport. 2. Remove insidious and nonsensical 'node' at bottom of Kidnappers Lane.	Accepted. <b>Recommend</b> plan amended.
	Plan 4	1. Up Hatherley's imported green spaces and allotment site at Badgeworth parish boundary omitted.	Accepted. <b>Recommend</b> plan amended.
	Plan 5	1. Uses Conservation Officer's initial proposal to chop up Conservation Area into separate small areas, involving considerable deletions. I submitted objections to this in 2000. Conservation Officer told me that she was now persuaded by my request to retain an overall Conservation Area with "character districts" as sub-areas of it. 2. Cannot mark any parts of Conservation Area as "lesser areas" until those deletions (proposed solely by Conservation Officer) debated and determined. Plan 5 should therefore be titled 'Proposed Character Areas'. 3. If this plan concerned with conservation	The plan needs to be amended to reflect the Council's intentions with regard to the review of conservation area designation, but remains a basis for further work on defining character throughout the town. The boundaries shown may change as this work progresses. <b>Recommend</b> plan amended.  Agreed. <b>Recommend</b> plan amended.
			Agreed. The plan is about character, not

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		<p>areas, should prominently mark outer boundary of existing conservation area. If not, then it should desist from indicating any proposed deletions. Instead, such areas should simply be given a provisional number and name.</p>	<p>designation. <b>Recommend</b> plan amended.</p>
	Plan 6	<p>Following should be added to improve list of landmarks:</p> <ul style="list-style-type: none"> <li>- Holy Trinity, Portland Street (and delete Millennium Restaurant)</li> <li>- Arle Court</li> <li>- Leckhampton and Battledown suburbs</li> <li>- East Court and The Hearne</li> <li>- Thirlestaine Hall (Chelsea BS)</li> <li>- Dean Close School</li> <li>- Honeybourne Line</li> <li>- St Peter's (Tewkesbury Road) and the listed 'Goods Shed'</li> <li>- Kidnappers Lane area (land commended by LPI Inspector as an amenity resource)</li> <li>- St Mark's spire</li> <li>- Holy Apostles' church and school</li> <li>- St Paul's Church</li> <li>- Up Hatherley (1776 Manor Farm and 1887 church)</li> </ul>	<p>These points are noted and can be included. <b>Recommend</b> plan amended.</p>
	Plan 11	<p>St Peter's Leckhampton is in wrong location.</p> <p>'Main Ring Road' subject of local plan objections. Similar 'Middle Ring' proposal was defeated during last local plan process. 'Hair-pin extrusion' of existing Inner Ring Road out through Gas Works junction will prove unworkable, as will attempt to route major vehicle flows around Montpellier.</p>	<p>Agreed. <b>Recommend</b> plan amended.</p> <p>The Council is currently giving further consideration being given to the management of traffic in the town centre.</p>
	Plan 16	<p>(Study area: existing land uses) Very relevant 'Core Commercial Area' not even marked.</p>	<p>Plan 16 is a statement of what exists. The Core Commercial Area is a policy mechanism not relevant to the plan.</p>
	Plan 22	<ol style="list-style-type: none"> <li>1. Remove tower block spike in Area 3.</li> <li>2. What is the tall building wrapped round the listed chapel in area 5? Such infill debatable and should not be proposed by council before it is applied for.</li> </ol>	<p>These do not represent a commitment but an interpretation of principles.</p>
	Plan 23	<ol style="list-style-type: none"> <li>1. Extremely unwise to be committing town to consultant's individual ideas on number of storeys all over plans 22 and 23. Delete storey heights and leave to interpretation by developers.</li> </ol>	<p>These do not represent a commitment but an interpretation of principles.</p>

## PLANNING OBLIGATIONS

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29		<p>With all strategic plans, provided the logic is sound, it is difficult to argue against the principles laid out in the local plan. My major reservation lies with the council's ability to implement and sustain the ongoing services to ensure the plan does enhance Cheltenham as a choice place to live.</p>	<p>The local plan sets out the Council's policies and proposals for the development and use of land in Cheltenham. The provision of services within the town is not dependent upon the local plan, but controlled by other departments within the Council.</p> <p>Where proposed development may increase pressure on existing services or facilities, then the Council will require developers through planning obligations to provide financial assistance with which to support or provide additional services and/or facilities.</p> <p><b>Local plan objective O5, O6, O29</b>  <b>Recommend</b> new policy considering how the needs arising from new development may be met through the provision of necessary infrastructure and facilities.</p>
158	Annex 3 1.11	<p><b>Gloucestershire Constabulary</b> Supports para 1.11, which looks at the suitability of sites for affordable housing. The Lansdown Road site is within a nationally important conservation area where clearly a high level of investment is required and therefore, a lower level or exemption from the requirement of affordable housing provision should be considered for this site. The Constabulary believes that the enhancement of the conservation area should override planning objectives for social housing provision.</p> <p>This point is addressed in PPG3 and Circular 6/98. PPG3 para 16 argues that consideration should be given to the sites suitability when assessing the requirements for affordable housing. Circular 6/98 para 10 indicates that where particular costs are associated with the development of the site and where it would prejudice realisation of achieving other planning objectives account should be given when assessing requirements for affordable housing.</p> <p>Guidance in PPG15 again places significant emphasis on the preservation and enhancement of sites within conservation areas. Para 4.14 states "Section 72 of the Act requires that special attention shall be paid in exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.. The Courts have recently confirmed that planning decisions in respect of development proposed to be carried out in a conservation area must give a high priority to the objective of preserving and enhancing the character or appearance of the area. If any proposed development would conflict with</p>	<p>The Government sets out that everyone must have the opportunity of a decent home. To meet this objective the local plan must consider the ability of individuals living in the town to buy or rent a home. The local plan must also consider the need to provide mixed and balanced communities through the provision of a range of housing type and tenure, and working closely with housing associations. The existence of a conservation area cannot preclude the provision of affordable housing and the extension of housing choice.</p> <p><b>Local plan objective O5, O22</b>  <b>Recommend</b> to ensure that inclusive developments are brought forward through the plan period and to help meet affordable housing needs within the town, the Council will apply the principles set out in supplementary planning guidance. This guidance 'Planning Obligations' identifies that 30% of provision of affordable housing will be sought on the development of sites providing over 15 dwellings.</p>

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		that objective, there will be a strong presumption against that grant of planning permission, though in exceptional cases the presumption may be overridden in favour of development which is desirable on the grounds of some other public interest."	
169		<p><b>Oldfield King Planning</b> It should be made clearer that the Council will regularly review and monitor housing needs over the plan period. The housing strategy may be a useful vehicle for publishing updated information as the plan becomes outdated.</p> <p>Insufficient reference to the form of information developers will be expected to provide to demonstrate the abnormal site costs for particular proposals and the Council's procedures for analysing such information.</p> <p>SPG should include a glossary of terms. A protocol should be included, setting out the specific role of the housing and planning authorities and the job titles of those involved.</p> <p>Housing needs justification is reliant upon most recent housing needs survey. This can be corroborated by secondary data to justify provision of affordable housing on sites above 15 dwellings. Expect to see reference to RPG10, Policy HO3.</p> <p>Insufficient explanation of the operation and advantages of the joint commissioning process.</p> <p>There should be clear prioritisation of the options for provision and more of a thrust on securing mixed and balanced communities. The integration of affordable housing within schemes, and a maximum group size should be specified.</p> <p>The term 'special needs housing' should be defined. Such provision is not necessarily affordable. Strongly object to para 1.8, to which footnote 2 of Circular 06/98 refers. Para 1.18 does not comply with the Circular, what about key workers housing?</p> <p>The Council should consider including standard legal clause/model S106 agreements as an appendix. Minimum RSL space and design standards, and car parking standards should form an appendix.</p> <p>Full integration between the local plan, housing strategy and SPG is essential. Consultation stage should be followed by</p>	<p>This already occurs. It will also be supplemented by county wide housing needs survey in 2004 to measure cross boundary, as well as inward migration.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Agree.</p> <p>Not necessary for the purposes of the plan.</p> <p>This is covered in part 2 of the Housing Needs Survey (2000). Given the nature of remaining sites in Cheltenham, many do not offer the opportunity of quotas - which in themselves do not create balanced communities.</p> <p>These are defined for each special needs grouping within tailored housing strategies produced by the Council from the results of the Housing Needs Survey (2000). Para 1.18 Change 'will not accept' to 'is unlikely to accept'.</p> <p>These are currently being drafted into an information pack for developers by the Cheltenham Joint Commissioning Partnership (CHIP).</p> <p>Comments noted.</p>

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		meetings with RSLs, developers, agents, landowners etc.	
182	<p data-bbox="172 551 268 618">Annex 21.5 (A)</p> <p data-bbox="172 763 228 797">2.13</p> <p data-bbox="172 1406 268 1529">1.1, 1.5, 3.2, 3.4, 3.5</p> <p data-bbox="172 1832 212 1865">5.5</p>	<p data-bbox="300 304 847 461"><b>Cheltenham Cycle Campaign</b> Encouraging to see an extension of supplementary guidance previously contained in just paras 2.51 and 2.52 of 1997 Plan, eg Annex 1 2.58, second point.</p> <p data-bbox="300 551 847 707">This element should specify that physical works which safely accommodate local increases in traffic must not act as an encouragement, directly or indirectly, to that extra traffic.</p> <p data-bbox="300 763 847 920">(re PPG13): Para 79 refers to 'facilities' and 'measures' for cyclists; given apparent lack of awareness of this distinction in other parts of review there is perhaps a need to recognise it here.</p> <p data-bbox="300 1406 847 1653">Section 106 obligations: Experience indicates that, to ensure compliance with Local Plan and town strategies, section 106 obligations should be subject to same degree of public consultation as applies when design and construction work totally under borough's initiative. This requirement should be reflected in at least one of these paragraphs.</p> <p data-bbox="300 1809 847 1966">Consideration should be given to tightening circumstances in which a transport plan is required; significant developments appear to have occurred recently without one. Consider also retrospective demand for travel plans.</p>	<p data-bbox="879 304 1469 528">The council recognises that works necessary to provide safe vehicular access to a site should not compromise the safety of other users of the highway. However in determining an appropriate form of access the council must take into account several site-specific factors including the location of a site on the highway network.</p> <p data-bbox="879 551 1469 730">It is possible that the definitions of the terms 'facility', 'measure' and 'works' could be subject to different interpretation. To avoid this it is proposed to establish their definitions in the context of this SPG and to revise the text accordingly.</p> <p data-bbox="879 763 1469 920">A 'facility' is physical, often for the exclusive use of one transport modal group, and considered by the council to be necessary in order to deliver its transport strategy. eg, a cycle lane, bus lane or pedestrian crossing.</p> <p data-bbox="879 920 1469 1133">A 'measure' is an action considered by the council to be necessary to deliver its transport strategy. It may be physical or non-physical and may create conditions which benefit one or more transport modal groups. eg, a Traffic Regulation Order restricting access on a street to cycles, pedestrians and buses only.</p> <p data-bbox="879 1133 1469 1379">References in the text to 'facilities' will be amended to 'measures and/or facilities', to clarify that both may be sought as planning obligations. 'Works' include physical and non-physical actions which may be sought by the council for the purposes of achieving a satisfactory form of development which complements the council's transport strategy.</p> <p data-bbox="879 1406 1469 1776">Timescales for planning applications are much shorter than for LTP funded works. To address this the council has started to circulate the weekly list of new planning applications to the Cycle Campaign, enabling major issues to be flagged up in advance and, where necessary, accommodated within S.106 Heads of Terms. Implementing a process for further consultation at the detailed design stage has the potential to improve the quality of designs approved however there would be resource and time scale implications for the council.</p> <p data-bbox="879 1809 1469 2047">The circumstances in which the council may require the implementation of a Travel Plan are set out in PPG13. If a planning authority considers it appropriate to require a travel plan for a development which falls out of this scope then it may be challenged at appeal. The planning authority cannot compel a developer to produce and implement a travel plan retrospectively - in</p>

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	5.7, 5.8	Given relatively large transport/travel generated by health/hospital sites, why doesn't 10% rule (of floor space NOT car parking) in 5.7 apply also to 5.8?	granting planning permission the planning authority has acknowledged that the development can be suitably accommodated within the local highway network.  Point noted. <b>Local plan objective O33, O35, O36</b> <b>Recommend</b> the review of the local plan will reflect the objectives and provisions of the Cheltenham Transport Plan, Gloucestershire LTP, within the context of guidance in PPG13 and DTLR Circular 1/97 - Planning Obligations.
190		<b>Vision 21</b> Welcome this aspect of review and urges council to take a proactive stance in using its powers to place obligations on developers as set out in Annex 1, para 2.58 pg3.	Comments noted.
193		<b>Countryside Agency</b> Re DETR Circular 1/97 and para 7.1. Agency would like to see this expanded to include reference to site permeability both within the urban design context and surrounding area and countryside.	Proposed supplementary planning guidance, 'Planning Obligations', sets out the nature and scope of contributions which will be sought as part of development in particular areas or on key sites. This paper broadly considers permeability within the context of transport accessibility, however detailed guidance on urban design issues are considered elsewhere within the local plan (General policies) and proposed supplementary planning guidance, 'Urban Design Framework'. <b>Local plan objective O2, O4, O8, O34</b> <b>Recommend</b> make links throughout local plan review to related supplementary planning guidance and associated planning policies.
213	3.3	<b>Highways Agency</b> No specific reference to need to assess the impact of developments on the Trunk Road Network, should this be required. Agency requests this omission be rectified. This will require the addition of the following text (or similar) to para 3.3:  'Should it be apparent that a development may have an impact upon the Trunk Road Network, then it will be necessary for the promoters of a site to ensure that any detrimental effects arising from that impact are addressed to the satisfaction of the Highways Agency.'	Comments noted. <b>Local plan objective O33, O34, O35, O36</b> <b>Recommend</b> The review of the local plan will require the submission of transport assessments alongside planning applications for major developments. Text will be revised to require development proposals which may generate additional traffic on the Trunk Road Network to prepare a traffic assessment on the impact of development.
214	Annex 2	<b>Railtrack</b> Considers draft supplementary planning guidance regarding transport related planning obligations to be satisfactory and agrees that a clear policy framework is required.	Comments noted.
221		<b>The Guinness Trust</b> Document appears both robust and clear in its requirements of developers.  The housing needs survey undertaken in Cheltenham in 2000 clearly demonstrates a need for a substantial number of new	Comments noted.

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		<p>affordable homes. Without the introduction of such a document demanding 30% of all new homes on sites of 15 or more to be affordable, I do not anticipate the provision of affordable housing will come anywhere close to proven demand. Furthermore, I believe the proposed formulas for the transfer of land and housing, and for the payment of commuted sums, appear both fair and fully appropriate.</p> <p>I would be keen to see Cheltenham Borough Council adopt the draft SPG for implementation on all relevant future developments.</p>	
224	2.58	<p><b>Environment Agency</b> Obligations expected from developers should also stress need to rehabilitate degraded environments, eg re-establishment of 'green corridors' along watercourses and removal of culverted sections.</p>	<p>The list of obligations listed in para 2.58 is intended to give an indication to developers of the type of obligations which the Council will seek from development. The list does not seek to identify all potential planning obligations.</p> <p>The type and level of obligation which will be sought by the Council will be determined on a site by site basis, dependent upon the needs arising from development proposals and impact upon the surrounding environment and local community.</p> <p><b>Local plan objective O1</b>  <b>Recommend</b> include the need to rehabilitate degraded environments in list of obligations, cross reference to the strategic green network.</p>
229	<p>Annex 1, 2.54/ 2.55 &amp; Annex 2, 3.1</p> <p>Annex 3 1.10-1.11</p> <p>1.11</p> <p>1.15-1.17</p>	<p><b>Prestbury Parish Council</b> Not clear that where benefits in a planning obligation go beyond stated tests, that they will be lawful. Case law (Tesco v Sainsbury for distributor road in Witney) established that a planning obligation must be directly related to the application. Compliance must be made with this case law.</p> <p>Affordable housing must be included in each development over 15 units and not accumulated to provide separate housing elsewhere at some future time.</p> <p>Care must be taken to ensure that developers' proposals are not deliberately aimed at avoiding provision of affordable housing on any given development. Affordable housing can be provided to the design standards for conservation areas.</p> <p>Not clear how extensions and other home improvements to low cost homes will be covered. Rules for improvement must be set down to ensure that affordable housing does not become unaffordable in future, without infringing 'human rights' of purchasers.</p>	<p>This is agreed.</p> <p>The document states that this is the presumption, although provision must be made for genuinely exceptional circumstances.</p> <p>Comments noted.</p> <p>This point is valid and required further consideration.  <b>Recommend</b> further consideration be given to this point.</p>
275	p 4.6	<p><b>Stagecoach Wales &amp; West</b> Requirement for development contributions should not be limited to works outside town centre "corridor"</p>	<p>Comments noted.</p>



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		in connection with Park & Ride strategy, but should encompass improvements to transport infrastructure designed to facilitate all sustainable transport modes.	
276		<b>David Wilson Estates</b> Minimum 30% provision of affordable housing on all identified residential development sites over 15 units is too onerous. We recognise that brownfield sites will probably be more accessible and are therefore more sustainably developed for local people. However, must also be recognised that there are significant additional development constraints in respect of brownfield land, for example contamination, and there should be scope for provision of affordable housing to be reduced where it can be demonstrated that viability is materially affected.	This requirement was brought about by the demonstrable: High development land prices and increasing lack of availability of brownfield development sites within Cheltenham's land locked borders, and Demand for affordable housing comprehensively detailed in Fordham's Housing Needs Survey 2000 report copies available on request from the authority. Potential for site exception already exists.
	1.7	States that income and desirability data suggest that demand is for affordable rented and only 5% for low cost home ownership. However definition of affordable housing does not differentiate between these two in terms of percentages and these figures should not be used to force provision of rented as opposed to low cost home ownership units.	Regulations allow for local determination based on justification, we cite Fordham's Housing Needs Survey 2000 for Cheltenham.
	1.14	refers to need to transfer completed unit to supported RSL at 85% TCI. No indication as to whether this figure includes on costs of RSL which can have a significant effect on ability of housing developer to provide a unit at this percentage.	Comment noted.
	1.18	Strongly object - current government guidance cannot be ignored on the basis that the authority perceives it to be contrary to all previous policy and practice. Cheltenham cannot be the exception and refuse to accept an offer of low cost market housing as fulfilling any part of a section 106 obligation. We will endeavour to ensure that this stance does not survive the Local Plan Inquiry process and, by using the appeal process if necessary, that it does not unduly impact upon applications prior to adoption of plan.	Comment noted.
286	2.52	<b>Robert Hitchens Ltd.</b> Whilst accepted that provision of affordable housing can be a material planning consideration (C6/98), new development (housing) does not give rise to a need for affordable housing. On contrary, adding to available housing stock should reduce need for affordable housing.	Agree, the need for affordable housing is already there, reference Fordham's Housing Needs Survey 2000 for Cheltenham. The survey report contains a comprehensive analysis of affordability in the borough - the cost of the majority of new build in Cheltenham, where subsidy is not applied, is demonstrably not affordable.
	Policy GP XXX	Support. Attention is however drawn to a number of items within annexes which would not accord with this Policy nor indeed Circular	

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		1/97.	
	2.58	Difficult to see how some of items in this list - eg a contribution to skills analysis and training provision, could possibly accord with Circular 1/97.	Comment noted.
	Annex 2, 4.4, 4.5	Important that all items sought are needed as a result of the development and not being sought to rectify an existing deficiency.	Comment noted.
	Annex 3, 1.4	This section should acknowledge that number of affordable houses sought will reflect the most up to date and robust information available at the time a planning application is determined.	Comment noted.
	1.6	With regard to provision of affordable homes important that exceptional local circumstances are demonstrated and justified through local plan process before lower threshold is adopted.	Already occurs.
		Para 9b of Circular 6/98 makes it clear that whilst local planning authorities can set an overall numeric target for whole plan area and set indicative targets (eg ..%) for specific suitable sites they cannot set indicative targets for whole plan area.	Comment noted.
	1.7	Needs to be tested through local plan process.	Comment noted.
	1.1	If a site is unsuitable for affordable housing then it should not be sought. Off site provision has to be by mutual agreement.	Agree.
	1.12	Should not preclude affordable housing being provided through other RSLs or developers. Key consideration is type and cost of dwelling provided.	Comment noted.
	1.14	Provision of serviced plots at nil cost is in conflict with Circular 6/98 and 1/97. This is also the case in respect of provision of completed dwellings. Furthermore it cannot be a requirement for developers to meet these criteria. Last clause of this para should be re examined.	Policy and procedure not unique to this authority.
	1.15-1.18	Too prescriptive in respect of pricing mechanism.	
	1.18	Contrary to Circular 6/98.	Justification of housing need contained within Fordham's Housing Needs Survey 2000 for Cheltenham.

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	1.19	This policy does not accord with government advice, in particular: - if site is located where there is already a high level of affordable housing it would be inappropriate to seek any further affordable housing nor indeed contributions towards its provision. - if there are sound planning reasons why affordable housing should not be located on site then no commuted sum should be sought.	Sound planning reasons must be evidenced.
289		<b>Cotswold District Council</b> Strongly support publication of SPG.	Comments noted.
290		<b>Cyclists Touring Club</b> We welcome inclusion of the new annex relating to transport and are happy with its contents.	Comments noted.
292		<b>Gloucestershire County Council</b> General support for this section. Can future, more explicit provisions be made for other planning obligation areas described in para 2.58?	Comments noted.
298	Annex 1  2.52 2.58           Annex 2           Annex 3	<b>Capitec (on behalf of NHS Executive South West)</b> Healthcare (such as primary care and 'special needs housing') should be included on the list of contributions to infrastructure provision in any policies concerning planning obligations for residential developments, to this end the following amendments to Annex 1 are requested: insert "healthcare facilities" to bullet point three. add "healthcare facilities" to list.  Disposal of surplus healthcare sites Trusts may need to reconfigure their estates to respond to changing service needs. This is likely to require site disposals, the proceeds of which will contribute to the delivery of improved health facilities. In considering the planning obligations that may be required from the commercial re-use of surplus healthcare sites, consideration should be given to the benefit to the local community that will result from any replacement facility that is being provided.  Improved accessibility to hospitals and other health facilities from new development is critical. The Annex should note that where developments contribute to better transport facilities, improvements to public transport links to healthcare facilities, in particular hospitals, should be encouraged.  Key Worker Housing/Affordable Housing The Annex should include reference to the need for key worker accommodation for those working in essential services, such as the NHS. PCG 3 advises that local authorities survey of housing needs should include the	Agree. Full range of special needs and supported housing strategies are available from the authority.           Comment noted.           Comment noted. Whilst this is currently a planning consideration we do not believe it to be an obligation.

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		needs of public sector key workers. The provision for such employees will assist those on low income who otherwise would not be able to enter the housing market and assist the recruitment and retention of staff. Section 106 agreements associated with new residential schemes should be used to deliver such units within the affordable housing element required by policy.	
304	Annex 2	Comments concerning transport, parking and traffic management made in respect of papers above to be taken into account when considering this annex.	
307		<b>GCHQ</b> Acknowledge that planning obligations may be used to achieve improvements to public transport, walking or cycling where such measures would be likely to influence travel patterns to the site involved, either on their own or as a series of measures. This is reflected in PPG13. However, whilst key developments which have the potential to impact upon the wider transportation network should make provision to contribute towards mitigation measures, it is government policy to ensure that such payments are relevant and appropriate in scale to the development being proposed. GCHQ also considers that it would be useful to have a monitoring mechanism in place to record how and when payments are being spent on specific highway (and other) improvement works.	

## APPRAISAL OF EXISTING POLICIES

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
122		<p><b>Stratford Rail Transport Group APPENDIX 1: Omissions</b> PPG12, 1999, para.5.23, states that local authorities should consider the potential of disused trackbeds for possible future transport schemes, including rail (passenger and freight) as well as light rail and apply appropriate policies. The local plan will need to take this into account in terms of providing meaningful protection of the former Cheltenham - Honeybourne - Stratford rail line from prejudicial development.</p> <p>PPG13, 2001, para.45, requires local authorities to protect sites and routes, both existing and potential which could be critical in developing infrastructure for the movement of freight, and ensure that any such disused transport sites and routes are not unnecessarily severed by new developments or transport infrastructure. Para. 74, contains similar advice in connection with reopening of rail lines. As with PPG12, this needs to be applied to the former Cheltenham - Honeybourne - Stratford railway in a meaningful way for future heavy rail, freight and passenger services.</p> <p>APPENDIX 2: Reference needs to be made to structure plan policies T6-Railway Network, with reference to the safeguarding of land for new or reopened railway lines. And Policy T7-Protection of Transport Corridors which have the potential for future use should be protected from development which would impair such use. These policies need to be applied to the former Cheltenham - Honeybourne - Stratford railway. Clearly the removal of a bridge and part of an embankment as part of the St James' redevelopment, cannot be regarded as complying with Policy T7.</p> <p>APPENDIX 3: Policy TP131 - Safeguarding of Honeybourne Line. The removal of a bridge and part of an embankment as part of the St James' redevelopment, cannot be regarded as sustainable or protecting, let alone assisting the routes reinstatement, as proposed in the Railtrack 2000 Network Management Statement.</p> <p>APPENDIX 4: The Cheltenham Transport Plan, on which the Transport Strategy is based, fails to mention the proposed reinstatement of the Cheltenham-Stratford railway and is therefore flawed in this respect.</p>	<p>Opportunities to re-establish passenger and freight routes within Cheltenham need to be considered within the context of the wider environment, including impacts upon the built environment, opportunities for other modes of travel, opportunities for recreation and nature conservation. This is reflected in Policy TP131 - safeguarding of Honeybourne Line</p> <p>See above.</p> <p>See above.</p> <p>Comments noted.</p> <p>Cheltenham Transport Plan sets out opportunities of the Honeybourne Line to accommodate a rapid transport system.</p>

127	2.12	<p><b>Leckhampton Parish Council</b> PPG2, Annex B, Green Belts, para. 2.12 We would ask you to note that the title of Annex B is 'Safeguarded Land', and that the term is defined as 'areas and sites which may be required to serve development needs in the long term i.e. well beyond the plan period. In order to make clear the position of 'white land', we suggest that the term 'safeguarded land' be used in the plan itself. The implications of the phrase 'may be required....in the long term', separated from the Annex B definition, are rather different.</p>	<p>White land generally relates to areas of land which is either not allocated for development, or not covered by a land use designation, e.g. public open space. Use of the term safeguarded land is not necessarily appropriate for land classified as white land. <b>Recommend</b> no change</p>
168	E.6 pg.29	<p><b>King Sturge</b> RE: Gloucestershire structure plan policy E.6 The former Indalex site, off Tewkesbury Road has been and should continue to be treated differently to other employment sites within the review of the local plan. The current retail commitments on the Indalex site and on adjoining sites, need to be recognised as does the committee report of 15.02.01, which sets out criteria for treating this particular site differently from other employment sites.</p>	<p>Comments noted <b>Recommend</b> the plan will recognise changes brought about by planning permissions. Any areas of retail development will be excluded from employment land as shown on the proposals map.</p>
182	47-60  3.13  79-80  87	<p><b>Cheltenham Cycle Campaign</b> PPG3: feel that somewhere in this sections, probably at this point, review should propose provision of housing with secure cycle parking incorporated into design. Especially important in small/affordable/apartment developments where might not otherwise be good places for cycle storage.</p> <p>PPG7 If local plan is to make proposals which relate to areas outside borough then specific reference should be made to recreational cycling. Necessary because CROW Act appears biased towards walking and horse riding.</p> <p>PPG13 Proposals should emphasise borough's commitment to both cycling 'facilities' (ie cycle specific constructs) and 'measures' which facilitate cycling by the more competent and confident cyclist (eg traffic calming, contra flows, road space reallocations and road layouts).</p> <p>PPG13 Review should propose consideration of criteria which result in greater prevalence of travel plans - it seems there are organisations and employers in town who can currently duck compilation of travel plans.</p>	<p>Comments noted. <b>Local plan recommendation O35</b> <b>Recommend</b> the transport strategy of the local plan will enforce the commitment to cycling set out in the Cheltenham Transport Plan. Council Action TP A139 currently applies to cycle parking. Consideration will be given to how improved cycle facilities and measures can be provided within new and existing developments.</p> <p>Opportunities which promote the health and well being of the community and support tourism and recreational opportunities within the town will be promoted.</p> <p>The local plan will reflect principles set out in the Cheltenham Transport Plan. However, it is important to note that detailed traffic management issues cannot be dealt with in the remit of the local plan. Issues set out in the Cheltenham Transport Plan will be implemented through a 5 year work programme.</p> <p>Travel plans can help deliver sustainable transport objectives by promoting reductions in car use, increased use of walking, cycling and public transport, and environmentally friendly delivery and freight movements <b>Local plan objective O36</b> <b>Recommend</b> local plan will promote the preparation of travel plans through the development control process. Where new developments are expected to generate significant amounts of travel then the preparation of a travel plan will be required as a condition of</p>

18	PPG17: given PPG wording why does comment not include a proposal to consult with sports clubs etc.		any planning consent.  <b>Local plan objective n/a</b> <b>Recommend</b> Sport England is identified as a statutory consultee and is consulted at the key stages of the review of the local plan. In addition Project Nexus works closely with the Parks and Landscape department of the Council who liaise closely with sports clubs within the town. The consultation stages of the local plan are widely publicised throughout the town and documents deposited in a range of facilities easily accessible to most people, including Municipal Offices, all libraries, neighbourhood centres, and parish councils. Any individual or group may make representations either in support or objection to the documents available for public consultation.
54	PPG17: again review should propose consideration and inclusion of cycling more broadly than specified in CROW.	Appendix 3 BE3 - seem to be hard on yourselves under 'Transport Energy'; are there no grounds for assessing a positive impact? RT88 & 89 - surely 'corner shops' (assume covers groups of neighbourhood shops) should have positive transport energy appraisal to match negative appraisal of out of centre locations? RC106 - are you sure that allotment holders' trips are not usually by foot or cycle? UI123 - ref transport energy, a bit too much wishful thinking here?	<b>Local plan objective O35</b> <b>Recommend</b> the impact of the CROW Act will be taken into account in the review of policies relating to countryside recreation and leisure. Support and development of the strategic green network over the plan period may offer opportunities to link the town with the wider countryside via green corridors, providing enhanced recreational opportunities for cyclists and walkers.  Comments regarding scoring of sustainability impacts noted.
189		<b>Foxley Tagg Ltd (on behalf of RMC UK Ltd)</b> Policies of restraint exist in order to protect areas of landscape value, however also necessary to be aware that a large number of dwellings will need to be provided within borough within Plan period. Overarching policy and aim of Council that these new dwellings should be sited in sustainable locations. In certain exceptional circumstances therefore, may be necessary to consider wider material considerations of a case rather than narrowly interpreting policy of restraint owing to landscape considerations that affect a site.  Considered that local planning authority will need to take very proactive and pragmatic stance with regard to provision of housing units if Structure Plan targets to be met in plan period. Requested, therefore, that RMC	Appraisal of existing policies recognises that opportunities may arise in areas of the urban fringe which makes beneficial use of land, reduces pressure on the wider countryside and the need to travel. This reflects the principles of PPG3 which set out that 'exceptions [to the sequential approach] will be where previously developed sites perform so poorly [in relation to the criteria of PPG3] as to preclude their use for housing before a particular greenfield site'. <b>Local plan objective O5, O6, O7, O9, O12, O22</b> <b>Recommend</b> local plan will reflect findings of the urban capacity study.

		site at Charlton Kings be taken into consideration as an allocation for housing development in review of Local Plan.	
190		<p><b>Vision 21</b> PPG1, pg2, para 27: this could also include a reference to using reclaimed and/or renewable materials.</p> <p>Sustainability Appraisal - V21 welcomes this thorough and comprehensive review of existing Local Plan Policy Framework.</p> <p>Built Environment - Note that there is no policy on salvage of materials (GP5 pg35) and would like to see refernce made to using renewable and/or salvaged material in BE 11, 13, 16, 25, 26 &amp; 28.</p> <p>Urban Green Environment - One of most appealing factors of Cheltenham for residents and visitors alike. Current Local Plan has failed to deliver an appropriate strategy for protecting and managing trees in Cheltenham. V21 want to see a commitment to producing a specific strategy on trees in revised plan.</p> <p>Natural Environment - V21 support concept identified in NE62 &amp; 63, pg44 that 'policy could be more positive'. Our view that policy should be more positive and should be designed to positively impact on energy efficiency and CO2 fixing.</p>	<p>Comments regarding appraisal of existing policies noted.</p> <p><b>Local plan objective O6, O12, O16, O17</b> <b>Recommend</b> the Council are preparing a tree strategy which will be incorporated into the policies and proposals of the local plan. The review of the local plan needs to consider the use of rewable resources both in terms of the built environment and the use of energy.</p>
214		<p><b>Railtrack</b> In connection with appraisal of PPG8 Railtrack supports suggested register of existing equipment and buildings with potential for use of masts. Railtrack uses telecommunications masts for a variety of purposes. These are typically located alongside the railway line. DETR is interested in promoting mast sharing.</p> <p>Re PPG13 Railtrack supports the Council's indication that it will update the Local Plan to reflect the Local Transport Plan. This should include the provisions of PPG13 relating to the location of development to maximise accessibility via a range of transport modes including rail.</p>	Comments noted.
224	18 & 26	<p><b>Environment Agency</b> PPG9 Nature Conservation, rather than merely "having regard to nature conservation designations" Local Plan should establish a presumption in favour of their retention and positive management.</p>	Comments noted.
	52	<p>PPG17 Sport and Recreation, should refer to need to attach planning conditions to developments, such as golf courses, to control raising of ground levels and/or infilling of natural topographical features. If such controls are not imposed at Town and</p>	Comments noted.



		<p>Country Planning stage danger that certain waste disposal operations will subsequently become feasible under exemptions allowed within specific legislation that directly controls such activities.</p> <p>PPG23 Planning and Pollution Control: under auspices of this general heading there will also be a requirement to take on board the controls set out in Part IIA of Environmental Protection Act 1990 in relation to Contaminated Land.</p> <p>PPG25 Development and Flood Risk: essential to note here that this Guidance contains an extensive section on importance of Sustainable Urban Drainage Systems. In addition to control of rate of surface water run-off, as part of development of greenfield sites, opportunities should also be taken to effect a reduction when redeveloping brownfield sites.</p>	<p>Agreed.</p> <p>Agreed <b>Local plan objective O16, O18, O30</b> <b>Recommend</b> preparation of SUDs SPG which will be placed on deposit with the local plan during Summer 2002.</p>
229	<p>2.4</p> <p>2.11, 3.4, 3.6, Annex D</p> <p>5.17, 6.24</p> <p>51, 59-62</p> <p>3.23</p> <p>24 &amp;35, 4.7</p> <p>7.16, 7.23</p>	<p><b>Prestbury Parish Council</b> PPG2 Green Belts This item must be subordinate to PPG3 (items 30, 32 &amp; 65 to 68). Use of green belt must be last resort.</p> <p>Basis of allocation of villages into one of the three categories identified must be provided. Para 3.16: Park &amp; Ride should be located on brownfield sites. Unsuitable for green belt.</p> <p>PPG12 Development Plans Proposal for NWDR should be removed from plan because no likelihood of it being built within plan period. Presumably ice skating proposal would be included.</p> <p>PPG13 Transport: paras: see comments on Issue 6 Town Centre and PPG2 above.</p> <p>PPG15 Planning and the historic environment Listing of features that would be lost in cases of alteration/demolition should be compiled and made a material consideration in planning process.</p> <p>PPG17 Sport &amp; Recreation: paras: see comments on Issue 4 Built &amp; Natural Environment above.</p> <p>Regional Planning Guidance for the SW RPG10 Paras: see comments on Issue 2 Housing paras 2.9 and 2.13 above.</p>	<p>Government guidance requires local authorities to adopt a sequential approach when allocating land for development. However opportunities on the periphery of Cheltenham which bring forward opportunities for sustainable development need to be taken into account, given the tightly drawn urban boundary of the town. PPG13 makes an amendment to PPG2, recognising that sustainable options for Park and Ride sites may be located within the green belt</p> <p>Existing Green Belt policies of the local plan, reflect the provisions of PPG2.</p> <p>Local plan will consider findings of reports which will consider transport case and planning considerations of NWDR concept. Local plan makes provision for new recreational and leisure opportunities. Review of local plan will consider whether these policies need strengthening</p> <p>Comments noted.</p> <p>The Council are preparing a list of locally important buildings. Review of local plan will recognise the value buildings included on the local list of Cheltenham have upon the quality of the built environment and seek to protect these buildings from inappropriate development.</p>

	<p>Appendix 2 Policy H2: dwellings to be provided between 1991 &amp; 2011 should not be accepted blindly, but be subject to variation based upon real demand.</p> <p>Appendix 3 3.1 Policy impact matrix 3.1.2 &amp; 3.1.3: subjective value judgement process not clear. Presumed a 'positive impact' assessment is given when process of control would have positive impact.</p>	<p>See key issue housing</p> <p>Impacts of the policy matrix set out in Appendix 3 refer to sustainability impacts. Positive is therefore seen as a benefit. Agree that this is unclear, revised sustainability appraisal will seek to make this clearer.</p>
272	<p>'White Land' does not always mean 'land safeguarded for possible future development' as implied by para 2.12, for example Leckhampton White Land has been given special status by CBC in light of Inspector's comments in 1993 Public Inquiry.</p>	<p>The Inspector who considered comments of Cheltenham Borough Local Plan concluded that clarity should be provided regarding long term development needs. The Inspector recommended that 'white land' at Leckhampton should not be protected as a strategic reserve, due to issues including landscape, topography and access via network of footpaths. For these reasons the Inspector considered that land at Leckhampton should be considered in a way similar to Green Belt.</p>
280	<p><b>Town Planning Consultancy (on behalf of Chartwell Ltd.)</b> Suggest that the summary of PPG6 outlined on pages 6-7 is rather unbalanced. Particular omissions include the Government's objectives of maintaining an efficient, competitive and innovative retail sector, ensuring the availability of a wide range of shops, employment, services and facilities to which people have easy access by a choice of means of transport and, as a general principle, avoiding use of the planning system to restrict competition, preserve existing commercial interests or to prevent innovation (para 1.1).</p> <p>Summary also neglects to recognise that, in relation to comparison shopping, PPG6 accepts that some types of retailing, such as large stores selling bulky goods, may not be able to find suitable sites either in or on the edge of town centres (para 3.3). This echoes para 1.13, which recognises that this may well be the case in small or historic towns, In such cases, appropriate development should still be located where it will be easily accessible by a choice of means of transport. Similarly, para 3.7 accepts that out of centre developments may provide large showroom type uses that cannot be easily accommodated in town centre. In our view, these factors also need to be made explicit to demonstrate a rounded appreciation of the retail planning policy context.</p>	<p>Comments noted. Provisions of PPG6 reflected in adopted local plan.</p> <p>See local plan policy RT88 <b>Local plan objective O24, O25</b></p>
283	<p><b>Cheltenham Friends of the Earth</b> Policy NE58: suggest clause b is deleted from this policy.</p> <p>Support policy 63.</p>	<p>Comments noted.</p>
285	<p><b>PARC</b> PPG3: add reference to para 3</p>	<p>The need to support economic growth with</p>

	<p>which says "...the need for economic growth has to be reconciled with social and environmental considerations, particularly those of conserving and enhancing the quality of our environment in both town and country." The local plan policies are BE8, BE9 and BE30 and possibly/probably others.</p> <p>PPG15 paras 4.15/4.38: gaps in References in Adopted Local Plan that should be filled. Certainly these gaps should be filled for second revision.</p> <p>PPG17 paras 31-34: gaps in local plan references.</p>	<p>appropriate housing is considered by regional planning guidance and Gloucestershire County Council in determining housing requirements for the County. The housing and built environment policies of the local plan will need to consider how Cheltenham's housing needs may be accommodated whilst protecting and enhancing the quality of the built and natural environment.</p> <p>Comments noted.</p> <p>Comments noted. <b>Local plan objective O2, O3, O5, O6, O7, O11, O12, O16, O18, O26</b> <b>Recommend</b> the Council are currently undertaking a review of conservation areas, and preparing an urban tree strategy. Review of the councils approach to linking open spaces within the town to create a strategic green network.</p>
289	<p><b>Cotswold District Council</b> Appraisal of existing policies has further embraced the principles of sustainability, particularly with regard to changes that have occurred in national guidance on housing and transport.</p> <p>The appraisal process could have gone a bit further to examine possible targets for policies, which could provide the basis for monitoring. Establishing measurable targets is an important component in the Plan, Monitor and Manage approach.</p>	<p>Comments noted.</p> <p>Agree. The next stage of the sustainability appraisal process will seek to address this.</p>
290	<p><b>Cyclists Touring Club</b> Sustainability of GE37 (Green Areas), EM67 (Industrial Land) and RT89 (Corner Shops) may all have a positive rather than neutral impact on transport energy trips and modes if the places in question are dispersed around the town.</p>	<p>Comments noted.</p>
291	<p><b>Leckhampton Green Land Action Group</b> Pg4 PPG2 Green Belts: purported definition of 'white land' as land which may be required to serve development needs in the long term does not accord with general practice. PPG2 Annex B consistently refers to such land as 'safeguarded' land. Our understanding is that 'white land' arose from the practice of leaving land not allocated for any particular purpose white on planning maps, whereas land allocated for specific uses was coloured. Such white land is commonly described as 'unallocated'. This point is particularly relevant to land surrounding Kidnappers Lane in Leckhampton which has been consistently referred to as 'white' land with the meaning 'unallocated'.</p> <p>Propose that wording in the panel on Page 4 (and elsewhere where appropriate) should</p>	<p>See ref. 127, and ref. 272</p>

		<p>refer to 'safeguarded' land instead of 'white' land.</p> <p>Reasons (a) to be consistent with PPG 2 Annex B and with general usage in other planning documents, and (b) implications of a change in the status of land from 'white' or 'unallocated' land to 'safeguarded' land are potentially far reaching and should be the subject of formal procedures and decisions. Such a change must not be allowed to occur as a result of loose or ambiguous wording.</p>	
292		<p><b>Gloucestershire County Council</b></p> <p>Archaeology policies (BE34 and BE35) will need to be reviewed against government guidance and structure plan second review policies (S.6, NHE.6). Content of existing policies still generally appropriate although supporting text will require updating. Recommend that consideration also be given to including a policy covering historic landscape in general, with reference to Historic Landscape Characterisation for Gloucestershire currently being undertaken. Gloucestershire Historic Towns Survey has also produced information which will support a historical development and character-based policy approach.</p> <p>TP124 Safeguarding of highway proposals: as this may result in additional trips seems likely that there is a negative impact on transport energy : trips, rather than a positive impact.</p> <p>TP130 Parking provision in development: unlikely that parking has neutral impact on transport energy : trips. Would suggest it has a negative impact by providing for car use.</p>	Comments noted.
298	13	<p><b>Capitec (on behalf of NHS Executive South West)</b> PPG3 makes reference to the need to consider special needs groups, such as key worker housing. As stated above, the Housing Needs Survey should include the needs of public sector key workers.</p>	Comments noted.

## GENERAL COMMENTS

Ref. No.	Para Section	Summary of Response	Project Nexus Recommendation
171		<p>BT have a small number of sites within the built-up area of Cheltenham. BT will endeavour to advise the Council, at the earliest opportunity of any particular sites that are likely to be disposed of within the plan period.</p> <p>The existing telecommunications policy within the adopted plan does not accord with the recently revised PPG8. BT would support the inclusion of a policy relating to telecommunications which accords with the provisions of PPG8. Any such policy should be worded positively and should recognise the operational requirements of the technology and the need to balance the benefits of the development against any potential harm to visual amenity.</p> <p>In accordance with para 98 of PPG8, which states "It is the Government's firm view that the planning system is not the place for determining health safeguards", such a policy should not refer to health issues as a criteria for determining proposals. BT would recommend that the telecommunications policy is included within the First Deposit of the plan.</p>	Comments noted. Telecommunications policy updated to reflect provisions set out in PPG 8. Telecommunications SPG drafted.
181		<p><b>Cheltenham Chamber of Commerce</b>            Consultation processes: concern is expressed that the periods allowed for consultations are often too short for meaningful consultations to take place and asks that more time be given.</p>	Public consultation on the key issues of the local plan sought to be as flexible as possible in allowing groups and individuals to provide comments on the papers prepared. Extended deadlines were offered to groups/individuals who needed more time. The next stage of the local plan is however subject to statutory regulations (Town and Country Planning [Development Plan] Regulations 1999). The Council will be required to place the draft local plan on deposit for a period of 6 weeks, representations will be accepted as 'duly made comments' if they are made within this period.
224		<p><b>Environment Agency</b> Welcome Council's continued commitment to preservation and enhancement of environment and the way this concept is interwoven throughout documents. Note strong lead given by RPG for SW and Glos Structure Plan and Council's aim to add to these controls by formulation of policies reflecting detailed appraisal of local environment.</p>	Comments noted.
236		<p>Recently received the Clarion and found it really refreshing to find that the council is so interested in keeping residents informed of all council plans for future of Cheltenham. Also find plans excellent and full of good ideas to improve our lovely town.</p> <p><i>Response included comments which cannot be dealt within the remit of the local plan. For details please see report 'other comments'.</i></p>	Comments noted.
272		In general, welcome and support proposals put forward in this set of documents and in	Comments noted.

		particular, the extent to which it has been possible to fulfil the housing requirement placed on Cheltenham without resorting to greenfield development. However foresee greater difficulty next time round, for which radical planning will be required.	
289		<b>Cotswolds District Council</b> Welcome the all-encompassing approach to the review of the Local Plan, consulting on all review papers at one stage, very brave. This approach should hopefully save time as review of the plan is advanced.	Comments noted.
295	1.7	<p><b>Swindon Parish Council</b> Opening para should be amended to reflect and respect the fact that although town is a large chunk of Cheltenham other areas bounding the town also have a special built environment that should be equally respected.</p> <p>Cheltenham described as a 'major urban area' - compared to what? It is a relatively small town in the national scheme of things.</p> <p>This draft is an assault on greenbelt and green land. Transport and parking proposals appear to be heavily biased towards visitors rather than residents of town and in particular those in outlying areas. Amplified by proposed construction of 'gateways' which totally ignore character of areas these will be within. Latham proposal not solution - only concerned with providing front for visitors, not interested in impact of proposals on residents, traffic management or area as a whole. Area has many problems and they all need to be considered to produce a complete solution. This requires a detailed report of its own with proposals being provided for public consultation.</p> <p>Draft local plan has many areas that are incomplete and are lacking data or information to enable draft to be fully considered. Further draft required before it progresses to approved status. Appears to be no intention to go through each of proposed solutions to identify areas of conflict and put together a cohesive document. Intention appears to be that each document should stand as it is - recipe for creating problems and allows for interpreting of rules to suit the case.</p> <p>Swindon parish area has many problems and every section of this document ignores them. None of proposals for area will benefit parish and all will have detrimental effect on village, particularly in terms of traffic problems.</p>	<p>Comments noted.</p> <p>Cheltenham is a major urban area in the context of Gloucestershire.</p> <p>Comments noted.</p>

## REFERENCE NUMBERS FOR STATUTORY CONSULTEES AND OTHER INTERESTED PARTIES

Ref no	Organisation
26	Simon Pontifex & Associates
86	Hunter Page Planning
119	Prowting Projects Ltd.
122	Stratford Rail Transport Group
129	Gloucestershire Fire and Rescue Service
135	Green Belt Protection Society
144	English Nature
158	Gloucestershire Constabulary
160	Cotswold Line Promotion Group
164	Railway Development Society
167	Town Planning Consultancy
168	King Sturge
169	Oldfield King Planning
170	Pittville Area Residents Association
180	Cheltenham Borough Council
181	Cheltenham Chamber of Commerce
182	Cheltenham Cycle Campaign
183	Gloucester City Council
188	Cheltenham Civic Society
189	Foxley Tagg Planning Ltd (representing RMC (UK) Ltd)
190	Vision 21
192	The House Builders Federation
193	The Countryside Agency (SW Region)
194	Mason Richards Planning (representing Bovis Homes)
201	Tewkesbury Borough Council
211	Roger Tym & Partners
213	Highways Agency
214	Railtrack PLC
216	6024 Preservation Society Limited
221	The Guinness Trust
224	Environment Agency
229	Prestbury Parish Council
237	Stratford on Avon, Broadway Railway Society 1999 Ltd
240	Cheltenham Conservation Area Advisory Panel
241	Foxley Tagg Planning Limited (representing Wilcon Homes Western)
244	Swindon Village Society

<b>Ref no</b>	<b>Organisation</b>
258	Cheltenham Chamber of Commerce (transport section)
259	Pittville Area Residents Association
274	Shoosmiths Solicitors (representing J. A. Pye Ltd.)
275	Stagecoach West & Wales
276	David Wilson Estates
277	King Sturge (representing Douglas Equipment Limited)
279	Town Planning Consultancy (representing B & Q Ltd)
280	Town Planning Consultancy (representing Chartwell Land)
281	Up Hatherley Parish Council
283	Cheltenham Friends of the Earth
284	Gloucestershire Wildlife Trust
285	PARC
286	Robert Hitchins Limited
287	CPRE Gloucestershire
288	English Heritage
289	Cotswold District Council
290	Cyclists Touring Club
291	Leckhampton Green Land Action Group
292	Gloucestershire County Council
293	Peacock & Smith (representing W. M. Morrison Supermarkets plc.)
295	Swindon Parish Council
298	Capitec (representing NHS Executive S. W.)
299	RPS Chapman Warren (representing Redrow Homes S. W. Ltd.)
300	Town Planning Consultancy (representing Costco Wholesale UK)
307	GCHQ