



CHEL TENHAM

BOROUGH COUNCIL

Notice of a meeting of Planning Committee

Thursday, 18 October 2018
6.00 pm

Membership	
Councillors:	Garth Barnes (Chair), Paul Baker (Vice-Chair), Stephen Cooke, Diggory Seacome, Victoria Atherstone, Bernard Fisher, Dilys Barrell, Mike Collins, Wendy Flynn, Alex Hegenbarth, Karl Hobley, Paul McCloskey, Tony Oliver, Simon Wheeler and John Payne

The Council has a substitution process and any substitutions will be announced at the meeting

Agenda

1. **APOLOGIES**
2. **DECLARATIONS OF INTEREST**
3. **DECLARATIONS OF INDEPENDENT SITE VISITS**
4. **PUBLIC QUESTIONS**
5. **MINUTES OF LAST MEETING** (Pages 7 - 20)
6. **PLANNING/LISTED BUILDING/CONSERVATION AREA
CONSENT/ADVERTISEMENT APPLICATIONS,
APPLICATIONS FOR LAWFUL DEVELOPMENT
CERTIFICATE AND TREE RELATED APPLICATIONS –
SEE MAIN SCHEDULE**
 - a) **18/01004/FUL Land at North Road West and
Grovefield Way** (Pages 21 - 328)
 - b) **18/01318/FUL & LBC Little Priory, Mill Street** (Pages 329 - 340)
 - c) **18/01620/FUL Wellesbourne, Oakfield Street** (Pages 341 - 354)
 - d) **18/01630/FUL Unit 30, Regent Arcade** (Pages 355 - 372)
 - e) **18/01770/FUL & LBC St Mary's Mission, High
Street** (Pages 373 - 380)

**7. ANY OTHER ITEMS THE CHAIRMAN DETERMINES
URGENT AND REQUIRES A DECISION**

Contact Officer: Judith Baker, Planning Committee Co-ordinator,
Email: builtenvironment@cheltenham.gov.uk

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Planning Committee

20th September 2018

Present:

Members (13)

Councillors Barnes, Chair (GB); Baker, Vice-Chair (PB); Atherstone (VA); Barrell (DB); Collins (MC); Hegenbarth (AH); Hobley (KH); McCloskey (PM); Oliver (TO); Payne (JP); Seacome (DS); Wheeler (SW).

Substitutes: Councillor Louise Savage (LS)

Officers

Tracey Crews, Director of Planning (TC)
Emma Pickernell, Senior Planning Officer (EP)
Joe Seymour, Senior Planning Officer (JS)
Victoria Collins, Planning Officer (VC)
Nick Jonathan, Legal Officer (NJ)

1. Apologies: Councillors Cooke, Fisher and Flynn.

2. Declarations of interest

18/01326/FUL Ashford Court Cottage

Cllr Barrell – is a member of SPJARA, the residents group which has objected to the application, but has not been involved in any planning discussions with that group.

18/01626/COU 29 Gloucester Road

Cllr Atherstone – is ward councillor for St Peter's, where the application site is situated, but has had no involvement in this application.

3. Declarations of independent site visits

Cllr Payne – visited all sites except **18/01646/FUL Blenheim Villa**, which he visited when the previous application was considered in July.

Cllr Barrell – visited **18/01050/FUL 28 The Avenue**, **18/01326/FUL Ashford Court Cottage**, and **18/01403/FUL 8 Horsefair Street**. Also visited **18/01646/FUL Blenheim Villa** in July.

4. Public Questions

There were none.

5. Minutes of last meeting

Resolved, that the minutes of the meeting held on 16th August 2018 be approved and signed as a correct record without corrections

6. Planning applications

With the agreement of members, the Chairman proposed altering the running order of the meeting, to allow applications with public speakers present to be considered first.

Application Number:	18/01050/FUL
Location:	28 The Avenue, Cheltenham
Proposal:	Proposed ground and first floor extensions and increase to existing roof height, together with remodelling and alterations to dwelling
View:	Yes
Officer Recommendation:	Permit
Committee Decision:	Permit
Letters of Rep:	2
Update Report:	i. Report update ii. Additional representations

GD introduced the application as above, with a recommendation to approve for reasons set out in the report and report update. It is at Committee at the request of Councillor Baker.

Public Speaking:

Mr Harrison, neighbour in objection

The five main reasons for objection are set out in his letter. Firstly, despite his property being directly overlooked, has not been consulted, nor has a site visit been made, contrary to recommendations in the NPPF. Secondly, the first floor windows will give a grandstand view of his garden; two are 7.5m from the boundary – 10.5m is the prescribed minimum distance – and the overlooking, loss of privacy and visual intrusion will have an adverse effect on his amenity. Notes a condition precluding a potential balcony on grounds of CP4, but this could apply equally to upper floor to ceiling windows and door as to a balcony; this loss of amenity is contrary to National Sustainable Development Strategy, NPPF, JCS, Local Plan, and SPD for Residential Alterations and Extensions. Thirdly, fully glazed gable three times the height of the existing bungalow is not subservient but will dominate, contrary to the SPD. Fourthly, modernist, fully-glazed gables are in marked contrast to the traditional forms and fenestrations of The Avenue, not tailored to the location. The scale, mass and form don't respect the site and its surroundings, and thus is not in keeping with the JCS and Local Plan. Lastly, there is a shortage of single-storey accommodation in Cheltenham, for elderly and disabled, and this conversion would therefore be counter to the County Council's 'Understanding Cheltenham' report and 'Quality of Life' objective of the NSDS. Hopes that Members will apply clear, policy-led principles when making their decision, and respectfully requests that the application is refused.

Member debate:

PB: asked for this application to come to Committee for a decision due to concerns about the potential impact on the bungalow next door. Members will have seen this on site, and can make their own judgement. The speaker lives in Charlton Park Gate, where the houses have staggeringly long gardens and views to the Cotswolds scarp – therefore struggles to take seriously the issue of overlooking. It's true that there isn't the required 10m gap to the boundary, but there is at least 60m from window to window. Cannot see that this will result in loss of amenity or privacy. On Planning View, considered the impact on the neighbouring bungalow to be marginal. There is a garden to the other side, so the proposal is not going to have any severe impact. Regarding design, this is always emotive and subjective. The Avenue is a very nice road to live in; many of the houses have been modified, extended, changed – it's what people do. The road is characterised by good-quality design – the speaker suggested that the proposal doesn't work in this location, but would not agree. It is next

door to a very good design, which is a good addition to the street scene; the proposal is good too, and will work well in this location. Is happy to agree with and support the officer recommendation. Notes the speaker's comment that if a balcony shouldn't be permitted, neither should the large windows, but there is a difference between a balcony, where people sit out for long spells of time, and a bedroom window, from which they will just take a cursory look. Commends the design and is happy to support.

PM: is surprised to note that three of the applications tonight are to convert bungalows into houses. Notes that the report states at Para. 6.17 that there are no specific policies in the JCS or Local Plan relating to the protection of bungalows for the elderly. The elderly will make up 20% of the JCS population by 2031; the figure is currently 13% of the population, so this represents a 50% increase. To ensure older people who may wish to downsize are considered, we need smaller, more accessible accommodation. Building should not just be about new houses; we should have concern for the number of bungalows. Have there been any conversations about policies to preserve bungalows? This is an overarching concern with all three of the applications tonight, though not so much with 8 Horsefair Street, which is not elderly-friendly. This bungalow, however, is eminently suitable for elderly people to retire to, which makes its loss disappointing.

GB: notes PM's comments regarding the protection of bungalows. It is something planning officers may be able to look into ***.

MC: has no particular problem with this application per se, but has one point to raise, which would equally apply to any garden grab development which will have an effect on the highway/footway. In his own ward, a large percentage of case work is concerned with damage to footways etc, caused by contractors, delivery vehicles and similar – and when any attempt is made to rectify this, is told it is nothing to do with Planning, but is a County Highways matter. Would like to explore adding a condition to applications whereby a contractor is liable to make good any damage which results in people not being able to use the footways, not leave it to be mended and paid for out of the public purse.

GB: is MC asking for such a condition on this particular application?

MC: if there is a footway, would ask what sort of plant is likely to be used, and yes, such a condition could be added to this application and a general condition could be worded to add to future applications, to ensure no lasting damage to the highways.

SW: reinforces MC's comments. As county councillor, all his local highways money is spent on repairing footpaths damaged by contractors. This type of condition needs to be included as standard, going forward. Regarding this application, went on Planning View, and would make the same comment for all the applications being considered tonight, converting bungalows into houses. Has sympathy for the resident at No. 27, but not for other complainants who live in two-storey buildings and are concerned about overlooking – they are in effect saying 'it's alright for me to see into your garden but not alright for you to see into mine'.

JP: agrees with all that has been said, particularly with regard to the design of the property. Can officers just give clarification on the question of the distance of the property from the boundary? This property is at an angle in the plot, making it difficult to gauge. Is 10m an average or a minimum requirement from the boundary under the regulations?

GD, in response:

- To JP, a distance of 10.5m to the boundary is a rule of thumb, and 21m from window to window. That distance is 72m in this case, so officers consider that a small amount of leeway on the 10.5m is acceptable here.

EP, in response:

- In response to MC's suggestion of a standard condition to make good the footway in the event of damage by contractors, has some concerns about how enforceable this would be on county-owned land. Will take the suggestion away*** and have a conversation with the County as to whether a standard condition to that effect could be created, although this is not something which we would ordinarily do;
- If there are concerns about construction, we would normally include a construction method statement in the conditions, although this wouldn't usually apply to a householder application. Works can be carried out on a house without planning permission, and it is for the County to take up any issues with whoever has done the work.

GB: so we will not require such a condition in this instance, but officers are happy to have a conversation with the County about the possibility of doing something along these lines in future.

Vote on officer recommendation to permit

13 in support – unanimous

PERMIT

Application Number:	18/01403/FUL		
Location:	8 Horsefair Street, Charlton Kings, Cheltenham		
Proposal:	Alterations and extensions including the creation of first floor accommodation		
View:	Yes		
Officer Recommendation:	Permit		
Committee Decision:	Permit		
Letters of Rep:	2	Update Report:	None

JS introduced the application as above, to also include off-street parking to the front of the property. It is at Committee at the request of Councillor McCloskey, and the recommendation is to permit.

Public Speaking:

Mrs Maguire, neighbour, in objection

Is representing the residents at 81 and 81a Cirencester Road, who strongly oppose the proposal. The application is misleading in its description as 'alterations and extension' to an existing bungalow. This is not a modestly-scaled extension but a complete redevelopment of a bungalow to a two-storey house, with two times the floor space of the existing dwelling. Secondly, the application has incorrectly titled elevations. Thirdly, the application and report fail to acknowledge the 15m tree within falling distance only 6m from the proposed rear wall, and does not provide the required arboreal assessment. This being the case, would question whether the application should have been validated. Fourthly, under permitted development, the bungalow could have been extended by 4 metres and dormer windows could have been installed, but this would not have caused any invasion of privacy – so to compare the proposed works to permitted development is irrelevant. The proposal is a total redevelopment, with the ridge height increased by 2 metres, and the roof pitch steeper by 10 degrees. The officer suggests that the new roof height will be roughly the same as the dwellings on either side, but it will not – it will be considerably higher than both, and the plans do not take perspective into account. Most importantly, the proposal will result in significant invasion of privacy and loss of amenity, due to severe overlooking from the two large windows, giving an intrusive, direct and uninterrupted view into the most private area of the gardens of both houses, and the living room of 81A. The newly-built large extension at 81A isn't shown on the plans – it is only 19.5m from the rear of the proposed house. Respectfully requests that Members consider refusing permission, as the

application contravenes planning policies: it fails the 21m separation rule in accordance with CP4, and contravenes JCS SD4 and SD14 and NPPF Paragraph 127.

Member debate:

PM: wanted this to come to planning committee to allow Members to stand in street and view the site, and also to be aware that what appear to be two buildings in the garden of the adjacent Cirencester Road are in fact a sunken patio with barbecue. 81A Cirencester Road is the bottom house on the drawing, and has a substantial recent extension is not shown on the plan. Was also keen for this to come to committee because there is quite a large tree which isn't getting much attention. It is not TPO'd, but on the question of permitted development, if a 4m extension was allowed, and building extended 4m further into to root system – what would the trees officer think about that? The bigger question is that what can be done under PD would involve damaging the roots of the neighbour's tree. This extension is 2.8m and the trees officer seems to be reasonably content that the root system will be OK, but it is a substantial tree and will be close to the building. We need to consider the properties of existing building and what it will look like extended.

SW: this property is currently a bungalow, and on Planning View, looked to the garden opposite but struggled to see the house with the trees in the way. Yes, a house will be more visible than a bungalow, but people in two-storey houses are complaining about other people wanting something similar to what they have themselves – they already have to advantage of being able to look into the bungalow owners' garden should they wish. The bungalow-owners have now decided to alter their home. If all the neighbouring properties were bungalows, it could be a fair argument, but overlooking two-storey buildings? The house will be not much more visible than the bungalow. Has no arguments against the officer recommendation.

DS: notes that the house next door to the bungalow has parking space in the front, set into the bank. If the ground is excavated for two more parking spaces, is there a guarantee that these won't fall into the void?

PB: it is important to be consistent in planning decisions, but takes a different view with this application compared with the previous one. The window-to-window distance of the previous application was 80m; here it is 20m. The bungalow would benefit from a significant renovation programme – fully supports this. On Planning View, looked to the site from the two gardens on Cirencester Road – this is why Planning View is so important, to stand in the gardens and see the impact. The redevelopment of the bungalow will cause the houses on Cirencester Road to suffer loss of amenity. If Velux windows were being proposed, it would be OK, but this proposal will result in significant overlooking of the gardens and patio on Cirencester Road. These are not massive gardens like those in Charlton Park Gate. The proposal will result in loss of amenity. Will not support it.

PM: it is a shame that the application at 44 Ashford Road isn't being discussed before this – it includes frosted glass at upper windows to prevent any overlooking of neighbouring properties. Won't repeat what PB has said – agrees with his comments. This proposal will result in a 2.5m increase in the ridge height. It changes the angles where the bottom and top of the window is, and these are significant windows, giving grandstand views to the garden behind. Is minded to refuse.

JS, in response:

- To DS, the excavation to the front will not result in any danger of the neighbour's front garden falling – a retaining wall is to be built;
- The ridge height is increasing by 2m – there is no denying this increase, but the roof height will still be commensurate with the size of dwellings generally, and within the range of dwellings in Horsefair Street;
- There is no uniform style of architecture, and officers do not consider the increase in height to be too high.

Vote on officer recommendation to permit

9 in support

4 in objection

PERMIT

Application Number:	18/01646/FUL
Location:	Blenheim Villa, The Reddings, Cheltenham
Proposal:	The erection of two dwellings, and formation of new vehicular access
View:	Yes
Officer Recommendation:	Permit subject to a 106 Obligation
Committee Decision:	Refuse
Letters of Rep:	44
Update Report:	Representation from Councillor Britter (in place of addressing the meeting)

VH reminded Members that a similar application for two dwellings at Blenheim Villa was rejected at July Planning Committee, on the grounds that it failed to provide safe and suitable access. The current application is unchanged with regard to built form, design, layout and scale, but the access has increased from 4.1m to 5.2m, with a 1.2m wide footpath added to allow pedestrian access to each dwelling. An S106 agreement to cover the long-term maintenance of the hedge has been agreed in draft, making provision for the developer to secure an S142 licence prior to occupation. The application is at Committee at the request of Councillor Britter and The Reddings Residents Association. The recommendation is to permit, subject to the S106 agreement.

Public Speaking:

Mr Zwart, The Reddings Residents Association, in objection

There have been 47 objections from residents, and also from ward councillors, Up Hatherley Parish Council, and The Reddings Residents Association. This new application does not address the safety concerns. Paragraph 110 of the new NPPF states that priority should be given to pedestrian and cycle movements, creating places that are safe and secure, and respond to the local character. The amount of hedge to be removed has been increased for the property owners, and the report glosses over traffic, safety, the dense hedge, the removal of protection policies and noise. An S142 licence is intended for those wanting to cultivate a hedge, not destroy it. It also carries financial and legal responsibilities and a cost in maintaining £5m public liability insurance – none of these issues are addressed by the applicant, and the proposal is therefore in breach of the NPPF – control of the hedge is lost, worsening safety for pedestrians and cyclists.

Is concerned as to how vehicles will turn into the development: delivery vans will have the reverse into or out of the driveway – there is no room for them to turn. Drivers will approach at 40mph – sometimes in the dark – looking for the gap in the hedge, and other motorists will be not be expecting cars to turn in or out. This is a busy pavement and cycleway, used by children and people in disability scooters. The application itself states that the turning provision on site is only suitable for cars, not delivery vans or refuse vehicles. If reversing off, the visibility splays are inadequate. The RRA has a photographic record of a traffic accident on the roundabout. This proposal is unsafe, contrary to public and community interest, and must be refused.

Mr Jones, Evans Jones Partnership, in support

This application seeks full planning permission for two dwellings, and is a re-submission of the scheme refused in July, with further amendments to address Members' residual objections relating solely to highway safety. The officer's unequivocal recommendation is to approve, supported by updated comments from the highways officer included in the report, warranting reconsideration of the scheme, and a favourable outcome. Firstly, amendments to the site access, including widening the

access and adding pedestrian footways, will improve safety for pedestrians and also also, crucially, improve cycleway and public footway visibility. Secondly, officers and CBC's solicitor have agreed on the wording of an S106 agreement to secure long-term maintenance of the hedgerow to maintain cycle and pedestrian visibility splays. The draft S106 agreement is supplemented by proposed planning conditions to further ensure long-term maintenance on the visibility splays in line with current Highways Authority standards. The reference to insurance cover is erroneous, as insurance is required by the contractors undertaking works on highway land, not by the property owners. Would inform Members that an appeal and application for costs against the previous refusal has been submitted, but will be immediately withdrawn if permission is granted tonight.

To reiterate, the application is fully policy compliant, with no objection from any statutory consultees. Officers have stated that the proposals are acceptable in principle, and there are no amenity, ecology, appearance or local character issues objections to the scheme. The revised scheme goes further to ensure has safe access and an S106 agreement to ensure this remains the case in perpetuity. There are no justifiable reasons to withhold consent, and therefore urges Members to support the officer recommendation.

Member debate:

MC: has he misunderstood or have Members just been threatened? The application was refused last time on highways issues, and it is unfortunate that there is no highways officer present tonight to discuss the amendments. The Chairman was not present at the July meeting, so may not be aware that this proposal is 99% the same as the previous one. That was rejected on highways safety issues, which are not addressed here. Is not against two houses on this site, but is against the proposed access and hazards this will cause to Grovefield Way cyclists and pedestrians – the change in access is the only proposed change. Is sympathetic with officers who have to try to find solutions with the S106 agreement and S142 licence, but this misses the point. There is a real highway safety issue here; the problem is not who owns the hedge or lives in the houses or has responsibility for maintaining the hedge. The problem is the hedge itself. The proposed solutions are not enforceable. Highways officers were present at the last meeting, talked about the proposed arrangement being 'alright' and said the access 'may be OK'; it was even suggested that drivers on Grovefield Way could flash their headlights to allow cars to exit the site, which is a ludicrous idea.

Regarding the S142 licence – the owners will ignore it, and who will police it? County Highways? CBC enforcement officers? County Highways don't manage the hedge properly now, and by the time an overgrown hedge is reported, it is already a hazard; the proposed condition will therefore be ineffective and unenforceable. As the issue of highways safety has not been addressed, would like to propose refusal on JCS Policy INF1, and Paragraphs 108, 109 and 110 of the NPPF. The highways report for the previous application was full of errors, not least talking of 'a few' openings onto Grovefield Way where there are none. If this is permitted, a precedent could be set. The objections are very valid and sensible; Councillor Britter's observations must also be taken into account. Proposes refusal for the policy reasons stated.

DB: still feels this is an accident waiting to happen, on this fast road, difficult to cross. With the cycleway and pedestrians, close to a roundabout, and with a 40mph limit – cannot imagine refuse lorries reversing into or out of the properties off Grovefield Way, but there is no room for them to turn round on the driveways. It looks extremely dangerous. The buildings are good, but a different access point is needed.

KH: would be interested to know officers' views on the potential appeal situation – Planning Committee has refused the application once, with an officer recommendation to permit, and now, with the amendments and another officer recommendation to permit, could be looking to refuse again. If

that is the case, how will this look at a subsequent appeal? Councillor Parsons has raised the issue of financial loss to the Council as a result of appeals costs. What do officers say?

SW: between the issues raised by the first speaker, echoed in Councillor Britter's letter and MC's subsequent comments, feels that all the nuts and bolts of this application have been covered. If we look at Grovefield Way, follow it all along to Shurdington Road, there isn't a single property opening onto the road; the only way to join Grovefield Way is by other roads with proper junctions. That is reasonable, and what the road was built for – not as an estate road. It is a very busy road, and the safest time to get in and out of the junctions is when the traffic is built up and slow-moving; at other times, it travels at 40mph. Emerging from a private driveway, which motorists are not expecting to see here, will be dangerous, despite the splays in the hedge – to suggest these take away the danger defeats reason. Is concerned about cyclists and reminded of a recent incident in Redgrove Way where a cyclist was knocked off his bike because he couldn't see an emerging car – it will be a similar here. The only access to Grovefield Way should be via the roads which join it at junctions and roundabouts. Cannot support any application with a driveway opening onto Grovefield Way. Alternatives have been discussed which would work perfectly, but the applicant doesn't seem to be giving them any consideration. Something significant must be done before he can consider supporting this application.

JP: is not particularly impressed with an applicant who threatens Planning Committee in order to get his way. Planning Committee looks at facts, and the fact is that this entrance is dangerous. Highways Officers say it isn't, but local knowledge says it is. Local councillors also confirm that it will be dangerous, and Planning Committee councillors must go with that. Cannot support this or any development on this side of Grovefield Way.

GB: it is a question of interpretation, but does not feel that the comments from the agent regarding an appeal represented a threat; it was more advising Members of the action that may be taken as a result of their decision tonight. Applicants are entitled to put such comments forward, and quite often do.

LS: we all have responsibility to be moderate in our use of language, but did not take the agent's words as a threat. However, cannot support this application. Safe access to the site would depend entirely on the maintenance of the visibility splays. These won't be maintained over time. Has issues of overgrowing hedges in his own ward. As a result, the point of entry and exit is likely to become dangerous; therefore cannot support the application.

DS: realises Members are not meant to re-design proposals on the hoof but the obvious answer is to have the exit down the side of Blenheim Villa, opening onto The Reddings and not onto Grovefield Way.

NJ, in response:

- To KH's question about costs, if the case goes to appeal, an inspector would look at whether the Council acted reasonably. The technical information provided by experts at County Highways states that the proposal is acceptable – no objection is raised – and therefore the possibility of costs against the Council could not be ruled out.

VH, in response:

- Regarding long-term maintenance of the hedge and visibility splays, this will be controlled by an S106 agreement and conditions.

Vote on officer recommendation to permit

0 in support

12 in objection

1 abstention

NOT CARRIED

MC: proposes refusal on the grounds previously stated – JCS Policy INF1, and NPPF Paragraphs 108, 109 and 110.

SW: Councillor Britter has suggested some other reasons. Do officers feel they are relevant?

EP, in response:

- Refusal reasons need to echo the previous refusal reasons. NPPF Paragraph 110 was not previously included, but will be now.

Vote on MC's move to refuse on INF1 and NPPF 108, 109, 110

12 in support

0 in objection

1 abstention

REFUSE

Application Number: 18/01326/FUL
Location: Ashford Court Cottage, 44 Ashford Road
Proposal: Construction of first floor to existing bungalow
View: Yes
Officer Recommendation: Permit
Committee Decision: Permit
Letters of Rep: 5 Update Report: None

GD introduced the application as above, for a first-floor extension to an existing bungalow. It is at Committee because of an objection from St Philip's and St James's Residents Association, and at the request of Ward Councillors Barrell and Harman due to neighbour concerns.

Public Speaking:

None.

Member debate:

MC: access to the property for construction work to take place isn't brilliant. What sort of wording would be used to make sure this is done safely and without damage, if the Committee is minded to permit?

DB: is struggling to visualise this proposal. There are two approved schemes for two houses in position at the moment – how do they all fit together? Walking round the outside of the site, it appears that the developer is jamming a lot of houses into a small space. They seem close together, and can imagine will have an overbearing impact on each other. Neighbours are very concerned about the loss of outlook etc. There have been some amendments to address any loss of privacy, but is not sure how these will relate to the other two houses which are yet to be built.

JP: isn't usually enthusiastic about boxes on existing properties, but this is an exception. The design is very useful, and provides reasonable accommodation – although the site itself is quite depressing and surrounded by other properties. The developer realises there could be an issue with privacy and proposes obscure glass in a number of windows. The site is relatively secluded – people will hardly know it's there, set back and surrounded by trees. As a result, the impact will be minimal on other residents. Would like to support this scheme.

KH: agrees with JP. Used to live in a flat overlooking this property so knows the mix of buildings in the area. The design seems sensitive to the site and will contribute more than what is currently there at the moment. Congratulates the applicant on the proposal. Appreciates neighbour concerns but not strongly enough to vote against the scheme.

GD, in response:

- To MC, regarding damage to the highway, as with the application at 28 The Avenue, this is a householder application; can include a construction method statement to alleviate concerns if Members wish;
- To DB, the application to the right hand side – ‘The Bungalow’ – is for demolition of the existing dwelling and construction of two detached dwellings. This has been taken into account in consideration of this application. The impact on that property is considered to be acceptable.

Vote on officer recommendation to permit

12 in support

0 in objection

1 abstention

PERMIT

Application Number:	18/01332/COU		
Location:	Renault, Mackenzie Way, Cheltenham		
Proposal:	Change of use to builders/roofers merchant and installation of steel palisade fencing and gates and external storage racking		
View:	Yes		
Officer Recommendation:	Permit		
Committee Decision:	Permit		
Letters of Rep:	0	Update Report:	None

VH introduced the application as above, to turn a vacant car showroom into a builders’ merchant, including the installation of steel fencing to the side and rear of the site. There is an error in the officer report at Paragraph 6.11 – the proposed external racking will be 5m not 4m high on the western boundary, and 4m not 3m along Manor Road. The scheme provides 17 car parking spaces to the front. It is at Planning Committee as a result of an objection from the Parish Council. The recommendation is to permit.

Public Speaking:

None.

Member debate:

PB: is not opposed to this application, but has one or two observations. On Planning View, wondered if a landscaping condition could be included – this is a prominent site, and some vegetation would be an enhancement and soften the impact of the fencing. Also notes there is a 60mph speed limit on Manor Road – is concerned about the egress and exit of vehicles onto the road. Again, no highways officer is present at the meeting to answer questions, but is there any possibility of adding double yellow lines along the whole length of the road down to the corner, to stop vehicles parking there, and on the verge. It would be helpful to see if this can be addressed.

JP: supports PB's comments. Swindon Village Parish Council has complained for many years about parking on the verge in this area, and nothing has been done. Double yellow lines and vegetation would help considerably.

VH, in response:

- Regarding landscaping, has spoken to the agent and asked if the racking can be moved slightly closer to the building to allow for this. The agent has stated that there is not room to do this;
- Believes the speed limit to be 30mph on this part of the road;
- Regarding HGV vehicles parking on the surrounding roads, the applicant has stated that these will deliver products and leave the site – they will not be parking in the area.

PB: is concerned about cars parking on the roadside, not HGVs.

VH, in response:

- The scheme provides 17 car parking spaces.

Vote on officer recommendation to permit

13 in support – unanimous

PERMIT

Application Number:	18/01626/COU		
Location:	29 Gloucester Road, Cheltenham		
Proposal:	Change of use of part of an existing storage building to create a new residential studio flat		
View:	Yes		
Officer Recommendation:	Permit		
Committee Decision:	Refuse		
Letters of Rep:	0	Update Report:	None

EP introduced the application as above, to create a small, self-contained unit in the curtilage of the main building. It is at Committee at the request of Councillor Willingham, who is concerned about the accommodation which will be provided.

Public Speaking:

Councillor Willingham, in objection

Is here to ask Members to refuse this application because he cares about the town and the ward he represents, and to demand better from planning. The town needs houses, but these should be comfortable, well designed and good quality, not garages which were never designed to be homes. We need to demand better for our town. Is surprised and saddened by the recommendation for approval. This is a garage, and its loss and replacement with a dwelling will exacerbate the serious existing parking problems in the area. It is also regrettable that the planning department has such contempt for the local streetscene that the highways officer's requested condition to stop up the existing drop kerb has been dismissed.

In policy terms, the proposal is deficient in many ways: it violates Policy HS2 – the housing density is 120 dwellings per hectare where policy states 30-50 per hectare. It is incompatible with HS3, as it will harm the area by increasing the concentration of subdivided dwellings. The site already has two dwellings and a shop - further sub-division will cause unacceptable harm and overcrowding, and not be compliant with Policy CP4 due to loss of amenity to adjoining land owners. Specifically, that policy

requires a minimum of 12m separation between overlooking windows of residential development - here it is less than 4m, giving insufficient privacy.

There are clear policy reasons to refuse, but we also need to think about living conditions for a potential resident. It would be like Harry Potter, living in the cupboard under the stairs - cramped and dingy, with totally inadequate living space. Paragraph 6.9 in the report states that Cheltenham has no standards for size of living space, but there is DCLG guidance from 2015 which sets the standard at 37sq metres for a single-bed, single-person dwelling. This proposal is 20 sq metres, barely half the national guideline, and will be bad for the physical and mental wellbeing of any future occupier. Allowing this proposal would set a dangerous precedent for the back lanes of Cheltenham, not just because of overcrowding, but because in London and other cities, these back-lane garage conversions are creating modern slums that house victims of human trafficking and modern slavery – out of sight and out of mind. This is not what we want, and whether Members use their heart and head, this is a bad proposal. They should demand better for Cheltenham and refuse the application.

Member debate:

JP: agrees with Councillor Willingham, and cannot understand the recommendation to permit. This is a squalid proposal, which fails to meet national standards. Cheltenham has none, and should therefore look to the DCLG guidance which recommends 37 sq metres – this is only 20 sq metres. It has no separate sleeping area, the bathroom appears to be accessed through the kitchen, and doesn't have a hand-wash basin. A bathroom should be 2 sq metres – this is nowhere near. Planning Committee should not support this poor quality development – it is an absolute disgrace.

VA: supports affordable housing, but allowing development such as this is going a step too far. Also agrees with DW. If she was living here, would find the lack of available space depressing. The bathroom is inadequate and has no washbasin. In addition the building is situated on a busy junction. Will not support the proposal.

PB: Councillor Willingham made a powerful and emotional argument to resist this proposal, echoed by JP. On Planning View, there was no question that someone could live there, but their quality of life and the impact of this would be detrimental. We need small-scale accommodation but should not allow this shanty-town proposal. This is simply an opportunity for someone to make more money. As a borough council, we should not support it. The poor quality amenity and lack of privacy are reasons enough to refuse.

DB: has always understood that it is against building regulations to have a toilet opening off a kitchen.

AH: why was this proposal recommended for approval?

SW: on Planning View, thought the site was a bit of a mess but could be redeveloped. Lived in some grotty bedsits in the 1960s, but we are supposed to be moving forward. Was going to support the officer recommendation, but is now ashamed for having thought it was acceptable. There are no windows, no daylight. It is a garage – that's all.

EP, in response:

- Regarding the size and quality of the accommodation, it is an issue in Cheltenham that there is no specific policy on floor space or living standards. Officers felt, having viewed the site, that it had all that is necessary for an independent lifestyle in a self-contained unit – amenity space, kitchen, bathroom – and there is a demand for small accommodation;
- appreciates Members' concerns, but they will need to pin their objections to policies. JCS Policy SD11 set out requirements for housing mix and standards, but states in the explanatory notes, that local authorities need to identify the size and type of housing that is required. Local policy

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provides guidance on general amenity and design issues but nothing to require that properties should be x size etc;

- regarding the layout and lack of wash basin, this this comes under building regulations. Is not an expert but building regs officers have been consulted but have not commented – and the proposal would need to comply with building regulations in order to proceed;
- would also remind Members that the layout is not fixed, so they need not over-worry about the lack of a hand-wash basin as this may be resolved later;
- to AH, as to why officers have recommended this proposal for approval, this is because the case officer visited the site and felt that it provided all that is required, albeit small.

GB: echoes earlier comments from SW – lived in some very tiny places in London, without any facilities, compared with which this proposal is a palace – but we have moved on from that time.

DS: if this application is refused tonight, the development is in such a state of advancement, how can we check that the developer has not secretly continued with the scheme and let the accommodation out? How can this be enforced?

EP, in response:

- the building is used as a store-room at the moment – a toilet and staffroom – so there has been no breach yet. If CBC receives any report of work happening, enforcement officers will follow up the case with their usual range of powers.

GB: so is over-development a reason for refusal?

EP, in response:

- it is a bit tricky on its own; needs to be supported with other concerns – such as design and amenity.

KH: there is no way he can vote for this in good conscience – it looks awful. As a subsidiary point, would request from the Chair and officers a discussion about minimum room sizes****? This is regularly raised by residents in St Paul's, and disproportionately affects student houses.

VA: echoes KH's comments. Would welcome measures in terms of minimum sizes for rooms.

PM: agrees with both KH and VA.

GB: suggests that if Members are minded to refuse, they delegate officers to work on the refusal reasons regarding amenity and design, in consultation with the Chair and Vice-Chair, to ensure agreement about refusal reasons.

PB: if permitted, it would result in loss of amenity for the people living in the flat next door, and also for the people working in the shop, losing their washroom etc.

Vote on officer recommendation to permit

0 in support – unanimous

NOT CARRIED

Vote on PB's move to refuse, with refusal reasons to be agreed by officers in consultation with Chair and Vice-Chair

13 in support – unanimous

REFUSE

Councillor Savage left the meeting at this point.

Application Number:	18/00936/LBC		
Location:	Municipal Offices, Cheltenham Borough Council, Promenade		
Proposal:	Remove modern stud partitions to the Urban Room and Agile Area on ground floor (part retrospective)		
View:	Yes		
Officer Recommendation:	Grant		
Committee Decision:	Grant		
Letters of Rep:	0	Update Report:	None

EP introduced the application for listed building consent to remove two internal, modern, partition walls in the Municipal Offices. The conservation officer is content with the proposal, and the application is at Committee because the building is council-owned.

Public Speaking:

None.

Member debate:

None.

Vote on officer recommendation to grant listed building consent

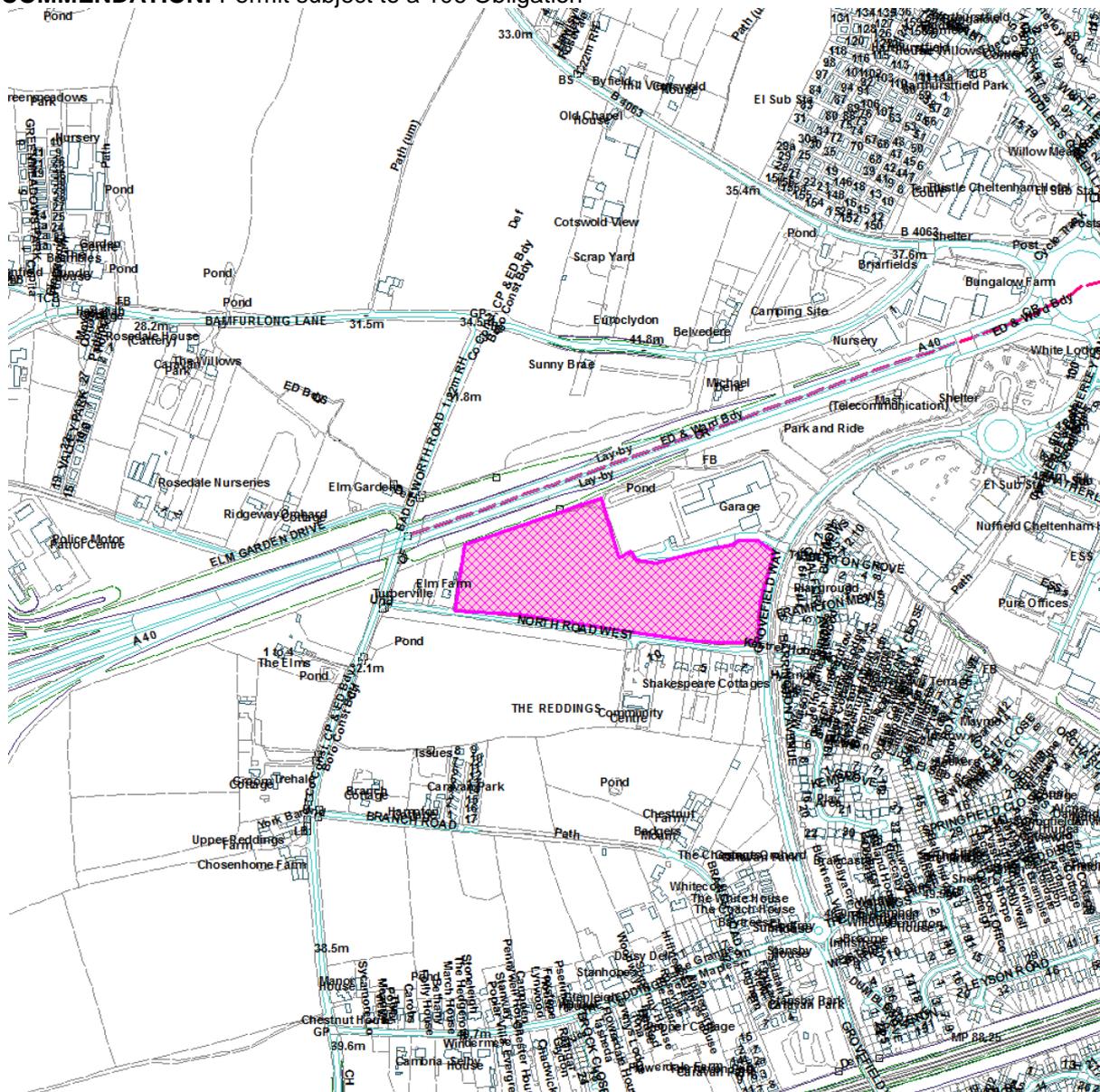
12 in support – unanimous

GRANT

The meeting ended at 7.45pm.

APPLICATION NO: 18/01004/FUL	OFFICER: Mr Joe Seymour
DATE REGISTERED: 23rd May 2018	DATE OF EXPIRY: 22nd August 2018
WARD: Benhall/The Reddings	PARISH:
APPLICANT:	Hinton Properties (Grovefield Way) Ltd
AGENT:	Hunter Page Planning
LOCATION:	Land At North Road West And Grovefield Way Cheltenham
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).

RECOMMENDATION: Permit subject to a 106 Obligation



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1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The site occupies a flat parcel of land approximately 6.4ha in area to the north-west of Grovefield Way, The Reddings on the western periphery of Cheltenham. It lies immediately west of the Gloucestershire County Council Park & Ride facility at Arle Court and the site is connected to the strategic highway network along the A40 and to junction 11 of the M5.
- 1.2 The site was previously within the Gloucester-Cheltenham Green Belt but following the adoption of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 ("JCS") in December 2017 the site has now been removed from the Green Belt.
- 1.3 The proposal comprises a hybrid planning application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission is sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access.
- 1.4 Cllr Nigel Britter has referred the application to be determined by the planning committee due to the level of local interest and concerns raised by residents.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

N/A

Relevant Planning History:

05/00799/OUT 29th March 2006 REFUSED (ALLOWED ON APPEAL 1st May 2007)

Outline planning permission for B1 industrial uses and the extension to the Arle Court Park and ride facility

09/00720/REM 18th December 2009 PERMITTED

Application for the approval of reserved matters following the grant of Outline Permission ref 05/00799/OUT dated 01.05.07:

1. The landscape master plan for the whole site along with a landscape management plan and schedule of landscape maintenance;
2. A design handbook prepared to provide guidance against which the design and external appearance of future phases of the development will be assessed;
3. Details of boundary treatment;
4. The design, external appearance of the buildings to be constructed in Phase 1;
5. Details of hard and soft landscape design for Phase 1.
6. The car parking provision for all phases of the development.

10/00468/TIME 22nd June 2012 PERMITTED

Extension of the time limit for implementation of planning permission reference 05/00799/OUT. (Outline planning permission for B1 industrial uses and the extension to the Arle Court Park and Ride facility)

12/01086/REM 21st August 2013 PERMITTED

Reserved matters in connection with permission 10/00468/TIME. Details of the access, siting, design, external appearance of the buildings and the landscaping of the site. In addition details required by conditions 4,6, 7, 8, 11, 12,13, 15 and 16 (full details of both hard and soft landscape works including proposed finished levels; means of enclosure; car

parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures proposed; and existing functional services above and below ground; retained landscape features; surface water drainage works, incorporating sustainable drainage systems; the positions, design, materials and type of boundary treatment to be erected; landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas; schedule of landscape maintenance for a minimum period of 5 years; detailed waste management strategy for the treatment, recycling, and re-use of waste arising from the construction of the development; renewable energy plan to provide sufficient on site renewable energy to reduce carbon dioxide emissions by at least 10%; Car parking levels on the site overall and for each completed building; secure covered cycle parking).

13/01101/FUL 14th March 2014 PERMITTED, SUBJECT TO S106

Proposed erection of a flagship BMW, Mini and Motorrad dealership including vehicle sales and servicing facilities and will include the creation of an access from Grovesfield Way

14/00656/FUL 12th January 2015 PERMITTED

Erection of a flagship BMW, Mini and Motorrad Dealership including vehicle sales and servicing facilities including an access from Grovesfield Way (Revision to scheme approved 14 March 2014 under reference 13/01101/FUL - 1.Raising height of building by 1 metre to allow adjustments in floor levels to provide a mezzanine floor below ground level: 2. Rotation of vehicle ramp to allow access: 3. Increase in Motorrad element from 160 sq m to 190 sq m: 4. Revised highway layout to relocate BMW customer access point to west of approved position)

14/01323/OUT 12th December 2014 PERMITTED

Outline application for up to 16,800 sq.m. of B1 Employment Use (on part of site already having the benefit of an extant planning permission for 22,000 sq.m. of B1 Employment Use, granted permission under applications 05/00799/OUT and 10/00468/TIME)

15/01848/FUL 4th March 2016 PERMITTED

Creation of attenuation pond for car showroom and erection of green 2.4m 358 type fence along the boundary of the A40

16/02208/FUL 17th January 2018 REFUSED (APPLICANT HAS APPEALED, INQUIRY TO DETERMINE THE APPLICATION SET FOR JANUARY 2019)

Hybrid application seeking detailed planning permission for a 5,034 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m supermarket food retail unit (Class A1), a 204 sq.m coffee shop retail unit and drive-thru (Use Classes A1 and A3), with associated parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved (except access).

3. POLICIES AND GUIDANCE

Saved Local Plan Policies

CP 2 Sequential approach to location of development

CP 3 Sustainable environment

CP 4 Safe and sustainable living

CP 5 Sustainable transport

CP 6 Mixed use development

CP 7 Design

EM 1 Employment uses

EM 2 Safeguarding of employment land

RT 1 Location of retail development

UI 4 Maintenance strips for watercourses

Adopted Joint Core Strategy (JCS) Policies

SP1 The Need for New Development
SP2 Distribution of New Development
SD1 Employment - Except Retail Development
SD2 Retail and City / Town Centres
SD3 Sustainable Design and Construction
SD4 Design Requirements
SD5 Green Belt
SD6 Landscape
SD9 Biodiversity and Geodiversity
SD14 Health and Environmental Quality
INF1 Transport Network
INF2 Flood Risk Management
INF6 Infrastructure Delivery
INF7 Developer Contributions

National Guidance

National Planning Policy Framework (NPPF)

4. CONSULTATIONS

Ward Councillors

5th July 2018

As Ward Councillor for the Benhall & The Reddings Ward in which the above application has been made, I continue to object on the same grounds to this 'revised' application as it does not address any of the concerns that I have already expressed regarding the initial proposal that was refused by the planning committee in December and is now subject to an appeal against that decision.

- I believe Grovesfield Way is not an appropriate site for a retail development. It is not 'out of town' it is adjacent to domestic properties which will be significantly impacted by retail activity. The approved B1 office development is likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day not forgetting the out of hour's deliveries.

- Many residents believe that this application with only outline permission requested for the majority of the B1 offices, means that neither CBC, nor they can have confidence that the proposals are transparent or coherent, and that the applicant will not subsequently reapply to adjust the proposals once he has secured permission for A and D class development on the site, as he did for BMW. It does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.

- Approval of retail development here will inevitably lead to further similar applications for this site and the evolution of a major out of town shopping area resulting in a substantial increase in disturbance, traffic and local congestion. There will be an impact on other businesses in the area, particularly given the proximity of both Asda and other day

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nurseries; also no impact assessment has been carried out on other small businesses in the area, in particular, "Springfield Stores" in The Reddings & small shops in both Hatherley and Benhall. They and the Community Centre are concerned that they may not be viable if this proposal is approved.

- There are when reviewing a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF. With some of the reports submitted significantly out-of-date and use old, flawed data especially traffic. Furthermore and perhaps most important it does not take into consideration the opening of the adjacent BMW site which opened in August 2017

- The National Planning Policy Framework, document champions a "Town Centre First" ethos within its retail chapter and states that new out of town shopping locations must be sustainable in transportation terms - this scheme would be completely reliant upon the car. It also states that key safeguards like Green Belt boundaries should only be altered in exceptional circumstances. This proposal is not an exceptional circumstance with no evidence of a need for the development.

- This proposal is not driven by the local community. It is a commercially driven venture in which the need of the local community and the impact on them has been completely ignored by the developer. There is no evidence that this type of development is actually wanted or needed

The area is already saturated with large supermarkets; this proposed development will have an immense negative impact on local small businesses, which in some cases would put them out of business.

- On examining if there is a demand the proposed services I would make the following points,

Child day nursery; there is a day nursery operating opposite the site plus at least 2 others within a half mile, again this is not B1 use and as previously stated will very likely have an effect on the existing Nurseries.

Supermarket; we have a large supermarket adjacent to the site and another less than 2 miles away along with a number of convenience stores, again this is not B1 use, It is likely to lead to more traffic in an already gridlocked area by diverting users of Aldi who live this side of town to it. There is no guarantee that Aldi will not simply close the other site in Cheltenham having obtained a bespoke premise.

Drive through Coffee shop; we have a number of coffee shops located in supermarkets adjacent to the site and DIY stores; again this is not B1 use. Drive through tend to end up polluting other areas, especially with the addition of 'fast food' you do not have to drive very far to find the discarded cartons and paper cups.

B1 Office Development; the office stock in Cheltenham is in the main modified Georgian buildings which although used are not suitable for modern open plan offices. There is also an abundance of small offices but not A1 quality offices. If a company choose to relocate, centralise or set up a regional office in Cheltenham then the offices on offer to fulfil this purpose are next to zero. Unless land is set aside and offices built the status quo will remain, the previous Planning Inspector in hindsight may have taken this view.

If allowed to go through where will new quality A1 offices be built, or do we simply assign more Greenbelt to fulfil this requirement. As a B1 development is already granted for this site I would suggest that there is still a chance to address this and to provide competitively priced offices to avoid the migration of businesses and maintain a healthy employment sector without taking more land to meet employment targets...

- The release of the land at Grovefield Way from the Green Belt as part of the Joint Core Strategy was supported by the development of the site for employment use. The development of the site for alternative uses including retail, do not represent exceptional circumstances which would justify the release of the land from the Green Belt in this location. Development of this type would be contrary to the Joint Core Strategy and the Green Belt principles outlined in the NPPF and the JCS.

- The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs. This proposal will take a further 12% of the site for non-B Class development to create 71 associated new full time jobs. However, that will be at a cost of 132, or more B1 jobs that would be created on the same 2448sq meters of the site. As such, the loss of B1 jobs to the retail/childcare A and D class proposal will remove a potential £588,000 per annum from the local economy compared to the equivalent B1 employment wages that would be generated by the extant B1 permission.

- The proposed development is not 'plan led' It comes before the adoption of the emerging Cheltenham Local and the newly adopted Joint Core Strategy, which together aim to shape the future development of our town. I feel the proposal will create a precedent for the kind of creeping, incoherent, urban sprawl which would damage the townscape and the surrounding area.

- The Joint Core Strategy Plan (Tewkesbury, Cheltenham and Gloucester) has included this site as New Employment Development.

Grovefield Way

3.22. The site occupies a flat parcel of land to the north-west of Grovefield Way, The Reddings on the western periphery of Cheltenham. It lies immediately west of the Gloucestershire County Council Park & Ride facility at Arle Court and is extremely well connected to the strategic highway network along the A40 and to J11 of the M5. Measuring approximately 6.4ha, the allocation provides an opportunity for the establishment of a modern business environment at an important gateway location. The site can be categorised as Greenfield and currently benefits from an extant planning consent for B1 employment uses. The Principal Urban Area is being amended to accommodate this allocation and part of the site already houses a flagship car dealership.

- Retail Policy SD2 of the Joint Core Strategy identifies that proposals for retail that are not located within a designated centre and are not in accordance with policy will also be robustly assessed against the requirements of the sequential text and impact test as set out in the NPPF. In this instance the necessary policy requirements of the sequential test are outlined at Paragraph 26 of the NPPF. Within the re-submitted Retail Statement, the applicant outlines at paragraph 7.17 they claim that the North Place site cannot realistically be regarded as an available development opportunity. Whilst it is true Morrison's have withdrawn their interest in the site due to a re-appraisal of their development programme, this does not demonstrate in itself that the site is unavailable or unviable for alternative foodstore proposals.

- I share residents' concerns acutely about the effect of traffic in the approaches to the Grovefield Way (B&Q) roundabout, and knock-on effects to Arle Court, particularly in peak hours. It should be remembered that, at the time of application, the adjacent BMW garage was not operational so the amount of traffic it will add is not yet being experienced; though I would agree with residents that it will likely be at the beginnings and ends of the day, where the roads in this area to and from Arle Court are already at saturation point. It also has the potential to push additional traffic through both Hatherley Lane and Hatherley Road, and the Reddings village, in an attempt to avoid Grovefield Way.

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- The route Grovefield Way/Cold Pool Lane/Up Hatherley Way is designated as the A40/A46 feeder roads. The transport infrastructure in this site area is already congested without adding further traffic loads. With huge number of vehicles using this and the adjoining BMW site will only add to the problem. This would be further exacerbated by recent housing development in Cold Pool lane, the new ASDA store and office park in Hatherley Lane and the proposed new care home at Arle Court. This impact will also be felt on all the adjoining roads, in particular the B&Q and Arle Court roundabouts which already have substantial traffic jams at peak periods. The residential roads in the proximity to the site are almost certain to become 'clogged' up with parked cars unable to find a parking space within the development site; again this is not a new problem in the area as the Park & Ride is filled up with GCHQ workers and contractors.

- Residents confirm that traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted.

- The car parking for all the offices is not suitable for the expected volume of workers. The result of this is that parking of cars in residential areas including North Road West, North Road East and connecting roads will become the norm.

- The National Planning Policy Framework suggests that new developments should not pass on flooding to a neighbouring sites yet I am told by neighbouring homeowners that their properties did not flood before the BMW development. Since its existence neighbours have written complaining that because the drainage system is antiquated and generally combines foul and storm water even during moderate rainstorm, the manholes in North Road West regularly lift and local flooding occurs. The Reddings Community Association are of the belief that the existing drainage system does not have adequate capacity and should be assessed before permission is granted as any upgrade work required will be a taxpayers expense.

- Historically the development site has acted as soakaway and in more recently a run off for Grovefield Way. Since the adjacent BMW development has taken place localised flooded has occurred on many occasions not just as a result of heavy rain storms. Bearing in mind all the problems associated with the existing drainage infrastructure to cope, it is surprising that a more robust design was not requested or that the developer's agreement to cover the cost of any infrastructure upgrades that may be required.

- The drawings do include additional water storage but it does seem that the discharge rates to the brook are unchanged and do not take account of the discharge that is already being directed there by the BMW development. Furthermore there are no calculations to show that the existing ditch drainage system can support the total discharge from both developments. In the absence of any obvious allowance for the site to be able to deal with the excess storm runoff from the A40 and Grovefield Way it seems logical that either Severn Trent Water/Gloucestershire Highways will need to improve the drainage from Grovefield Way to stop it flooding the development site and neighbouring properties or, that the proposed site designs need to be re adjusted to accommodate it.

- The flood assessment report for BMW is included but this was compiled in 2013 well out of date and as we know there have been local problems since its construction. The inclusion of the STWL drain record in North Road West, only confirms drains are in the area not whether they can take additional load. This needs to be reviewed now it's too late to address these issues once permission is granted even if it is made a condition of approval.

- I personally believe the proposed development will dominate the skyline; the new layout does little to redeem the proposals which are still unsuitable for the site. The buildings are too high and too large for the rural setting the current landscaping proposals do not provide

adequate screening or noise reduction properties. A high level bund has again been omitted. This is what is needed along the entire length of North Road West and should be heavily planted with mature trees and evergreens to a depth of several metres to enable a suitable screen.

- The hedgerows are one of the defining features of this area especially adjacent to North Road West and are vitally important to wildlife. The loss of the hedgerow that is indicated as part of the proposals means that not only is there a negative impact on the local wildlife but also on residents living in homes adjacent to the site. The noise and light pollution in that area is currently low despite close proximity of the A40 and M5. Any increase will therefore be detrimental to the area.

This proposal does not offer anything back to the community in terms of improved or additional amenities. The developer has gone against the clear indications of the inspector at the 2007 appeal in many ways. This behaviour would not be tolerated from domestic owners, and a great many residents feel it unfair that different rules seem to be being applied to developers.

It will not surprise you that many local residents feel that their original objections lodged with Cheltenham Borough Council (CBC) are still very valid and if local means local, as the government have suggested, then the community has spoken, and their wishes and concerns should be listened to.

For these reasons, the application should be refused.

The Reddings Residents Association

27th September 2018

We refer to our previous correspondence regarding the latest submission on the 18/01004/FUL | Hybrid application at Grovefield Way.

As we set out in our previous email, although the consultation period commenced when the drawings were added to the web page on 18 September 2018, they were essentially meaningless without the substantive documentation and that was not subsequently added until 7 days later on 25/9/18, meaning that this is now effectively a 14 day consultation.

The action will prejudice Consultees' and the public's opportunity to properly examine and comment on the submission.

We note your previously-stated opinion that you have only consented to a further consultation as a courtesy. Whilst we note item 11.4 of CBC's SCI, we consider the discretion afforded to run contrary to a viable democratic process, perhaps this is the reason that the "Council is drawing up an amended plans procedure which will set out a standard approach in this matter." as item 11.4 states?

On 25/9/18, we received an approach from Mr Fong to meet with us because " We have new plans emerging and I would like to table these with you".

We made a substantive response (copied below), to Mr Fong to facilitate such a meeting. In reply (copied below) Mr Fong has simply set out an offer to meet on 10/10/18, which is the day following the closure of the consultation period.

This the very first attempt that has been made at any sort of contact or consultation with the local community, since this saga began in December 2016. We are doing our best to be equitable in our deliberations, but, in order to make the meeting between us and Mr Fong have any useful purpose, we will need time to consult with the residents following the

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meeting. As you will see from the email below, we offered to try and arrange a public meeting shortly thereafter to which officers and Mr Fong would also be invited.

Whilst we will continue to meet with Mr Fong, we presently find that the new documents continue to make a very poor economic case to support retail on site, because most of the new jobs will simply reflect trade taken from the Asda, Morrisons & other small local stores. This is not "job creation"

First: Aldi is expected to create 16 full time equivalent jobs generating wages of £320,000. This equates to an average of £20,000 per employee. We have checked Aldi and the store assistant hourly rate which varies between £8.85 and £10.41. Although Aldi workers generally work 25 hours per week, if you used a 35 hour week as a comparison the annual salary would range would be £16,017 to £18,946.

The figures quoted therefore seem a bit high, unless they are including the employer contribution to the employee pension scheme, any other benefits, an adjustment for any managerial post or a longer full time week. Notwithstanding, they are still lower paid jobs, when the purpose for development on this "prized" greenbelt land was to create high paid "quality" jobs paying an average of £35,000 per annum.

Second, we have considered the economic net benefit to the community/Cheltenham Borough:

The total rates payable by Aldi would be £141,700. This equates to £2,725 per week or £389 per day. This represents 10.55% of the total net rateable value for the site. (£141,700/ £1,342,600). CBC's audited final accounts for the 2017/2018 year and total income was around £105m. The Aldi contribution would represent 0.13% of total income.

Thirdly, the latest economic assessment does not include trade forecasts for Aldi, with reference to the applicant's submission which shows the anticipated trade which will be diverted to the new Aldi.

The table seems to suggest that total trade for the new Aldi is £11.47m , but this includes £1.6m diverted from the existing Asda. For an effective analysis, this transfer of trade from the same company needs to be deducted.

The new total is £9.87m.

The new Aldi is predicted to divert £3.45m from Asda. So 35% of the new Aldi's business will be taken from an existing store, which is situated across the road.

If you add £2.87m predicted to be diverted from Morrisons, then the total of diverted trade becomes £6.32m. So 64% of Aldi's business will be diverted from 2 stores both within 5 minutes drive.

Any retail development will serve an existing surrounding area, and food retailing spending is fairly consistent, compared to luxury goods or capital expenditure.

The proposed over-provision of food retailers in one area will only dilute the amount of existing trade amongst the retailers present, and not lead to any more jobs. Rather, it can only lead to uncertainty and possible restructuring within the existing stores.

So, purely from an economic value, an Aldi cannot be justified on this prime B1 site, especially as the site was identified as being key to the economic "B1" future of Cheltenham, when permission was granted in the 2007 appeal. The contribution it will make to CBC's annual income is negligible and the majority of Aldi's business on this site

will be at the detriment of the existing supermarkets and established jobs and trade patterns.

Further, in order to attract new business from outside the area, it is beyond doubt that it will generate more traffic and pollution than an equivalent B1 office standing on this plot, because there will be so many journeys by so many different people for a single short period. The developers have also said they have reduced the car parking for Aldi and will put up barriers for the office car parks. That also limits Aldi's capacity and the risk of over-spill to carparks of others, the park and ride site and residential streets, which are already suffering greatly from the BMW staff parking issues. The current proposal to limit the Aldi parking to this extent will exacerbate the already significant local traffic issues. This outcome is eminently foreseeable, is contrary to the NPPF and is not dealt with by the applicant in his submission.

The Park & Ride's ability to serve the community, visitors to the town and the Cyber Park will be compromised by the additional traffic and parking, which again makes Aldi unviable on this site.

Statistics are being manipulated by the applicant in the presentation of B1 jobs created by reducing the area for each worker from the standard 18.3m² per person to 13.6m² per person. The BMW building is "retail" & has already removed a substantial number of potential B1 jobs from the original site. It is disingenuous to say 86% of the site is now B1. It is closer to 45% when including BMW. Before the Phase 2 B1 units are constructed and occupied, it will be closer to 80% retail. The applicant has only removed a small Costa unit from the retail element; the substantive application and case for any A class or D class on the site has not been made.

In summary we just cannot see that creating 16 lower paid jobs is a strong justification for building an Aldi.

Planning considerations

This is an 'out of town' location for Retail; and Cheltenham's Retail Plan (JCS Review) has not even been drafted, therefore the unofficial Arle Court/The Reddings 'shopping area' cannot be extended (along Grovefield Way) with support from current planning policy.

No updated accurate traffic modelling, has been provided & the surveys supplied are not valid, as they were conducted in a non-neutral month. However many of the applicant's consultants may seek to justify this breach, the fact remains that the data is not valid and there has been a huge amount of time available to the applicant to correct this.

Traffic impact was a reason for refusal in December 2017 and has not been addressed at all by the applicant since that date.

We have yet to complete our assessment of the site drawings, landscaping and revised drainage proposals, and will forward our comments once we have done so. We have followed the scrutiny to which application "18/01180/FUL | Erection of three storey B1(a) office building with associated car parking, landscaping and infrastructure | Land To Rear Of Nuffield Hospital Hatherley Lane Cheltenham Gloucestershire" (that we are supporting) has been subjected to by GCC Local Flood Authority, Environmental Health and GCC Highways Liaison Officer, which we applaud. However, this is in marked contrast to the scrutiny that this application has been subjected to. We also note your agreement that the whole presentation of the scheme is confusing.

We still have grave misgivings about placing a childrens' nursery, with almost no "green areas" in which to play safely within a carpark, next to the A40 trunk road and the South West Distributor Road (Grovefield Way) when there is so much current concern being

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expressed about the effect that fumes and pollution have on the mental health and lung development of infants. This concern is exacerbated by the immediate proximity to the Aldi car park where there will be such a huge turnaround of vehicles associated with short duration shopping trips. Several members of the planning committee raised similar concerns. We do not see how the applicant has addressed these in the latest submission. This must be a matter upon which the Environmental Health officer must have an opinion.

The NPPF is clear that new developments must support health and well being; we do not presently see that the applicant makes this case at all.

Summary

We welcome the approach for community consultation. However, if that consultation is to be after the consultation has closed, then we have no alternative but to maintain our objection as set out above, supplemented by the detail in our previous objections and scrutiny of the drawings and drainage details submitted on 25/9/18.

If the consultation is extended by a further 2 weeks to 23 October 2018, we will have the opportunity to consult with Mr Fong, consider his presentation, arrange a public meeting and take residents' opinions, before commenting either with objection/neutral/or, support.

In order for the other consultees to properly consider the new submission we aver that they will also need greater time to make an adequate assessment.

This email has been copied to Mr Fong and by copy, we request his agreement to an extension of the consultation period, in order that we may take the consultation into account in our comments.

We look forward to hearing from you.

Wales And West Utilities

4th June 2018

Letter and plan available to view on line.

Gloucestershire Centre For Environmental Records

5th June 2018

Biodiversity report received.

GCC Highways Planning Liaison Officer

4th October 2018

I refer to the above planning application received on the 22nd May 2018 with submitted details;

Application Form,
Design and Access Addendum,
Corinthian Park Letter,
Letter from Hunterpage,
Transport Assessment - Technical Note 03,
Illustrative Masterplan Rev E,
178-70 Rev A - Location Plan,
178-71 Rev A - Existing Site Plan,

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178-59 Rev D - ALDI HGV Tracking,
178-60 Rev E - HDN Refuse Tracking,
178-63 Rev F - Office Refuse Tracking,
178-96 Rev F - Proposed Block Plan,
Hard Landscaping Proposals Sheet 1 - 3 Rev D,
Hard Landscaping Proposals Sheet 2 - 3 Rev D,
Hard Landscaping Proposals Sheet 3 - 3 Rev F.

Location:

The application site is situated adjacent to Grovefield Way, a class 3 highway subject to a 40mph speed restriction. The site falls within Greenbelt land to the West of Cheltenham with the A40 "Golden Valley" bordering the Northern boundary. Grovefield Way adjoins the A40, to the north, at the strategically important Arle Court Roundabout. Connection to the Strategic Road Network is via Junction 11 of the M5 located to the West. Grovefield Way is bordered to the east by retail, commercial and residential developments of The Reddings and Up Hatherley. Grovefield Way becomes Cold Pool Lane to the South East before adjoining Up Hatherley Way which provides connection to the A46. North Road West is a class 4 highway and abuts the sites southern boundary and links to the class 3 Badgeworth Road to the west.

History:

The site has a detailed planning history with a number of previous granted permissions, Outline Planning permission (ref 05/00799/OUT), was granted for the erection of 22,000sqm of B1 employment use in 2007 across the entirety of the 6.4ha site. The approval of reserved matters (ref 09/00720/REM, 10/00468/TIME, and 12/01086/REM) was granted in 2013.

Since 2007, the North East portion of the site has been subject to separate planning applications, ref 13/01101/FUL and 14/00656/FUL for the erection of a flagship BMW car sales and servicing garage comprising 7595sqm. This site has been fully built out.

Extant permission was granted for the remaining portion of the site for 16,800sqm of B1 employment use in 2014 under ref 14/01323/OUT and provides the site with a fall-back position that will be considered as material when assessing the current proposal.

The current application is a very similar to a previous application under ref 16/02208/FUL which was refused planning permission 14th December 2017. That submission is currently going through the appeal process. The difference between the 2018 and 2016 proposals is the removal of the drive-thru coffee shop which has been replaced by a further office block to create 5 B1 office units.

Overall Site Access:

The proposed access road and junction with Grovefield Way was agreed and deemed acceptable as a part of the adjoining 2014 BMW Car sales application. The 160m access road that serves the car sales will form the access road for this application and will be extended into the proposed site.

Pedestrian access will be provided by the extension of the footways that are to serve the BMW car sales garage.

Accessibility:

Sustainable Travel services and opportunities are available on Grovefield Way to the South of the site; A40 East and West bound carriageways to the North East and Hatherley Lane, opposite ASDA, to the East. Grovefield Way features a shared footway/cycleway on the Eastern side. The cycleway leads to Arle Court roundabout with access to the northern arms provided by a subway. The subway also allows access to the eastbound bus stops on the A40, Cheltenham Side. To the South the cycleway/footway connects to The Reddings

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and the A46. Pedestrian movements south of the site are supported by a pelican crossing which allows access to The Reddings from North Road West and the proposed development site. The cycle facilities form part of NCR 41.

Public Transport:

Bus services are available at the stops located 350m to the south of the development site on Grovefield Way and 550m East on Hatherley Lane. This stop is served by the J and K service running on a frequency of 1 every 90 minutes. Further stops are available on the A40 east of Arle Court Roundabout some 750m North East. The Stops are served by Stagecoach service 94/94U which provide regular services to Gloucester and Cheltenham Centres every 10 minutes during peak periods and 30 minutes approximately off peak, with services running 7 days a week 24hours (94). These services provide a reliable sustainable transport alternative to that of the private motor car and have the potential to encourage a modal shift. The IHT Providing for Journeys on Foot document table 3.2 states that a desirable walking distance to a bus stop is 500m, with a distance of up to 1000m being regarded as acceptable. The development site is therefore sustainably located and accessible via a number of non-car based alternative transport methods.

Local Highway Network:

Grovefield Way:

Grovefield Way is a class 3 highway with a 40mph speed restriction. It connects with the A40 to the North, Cold Pool Lane and The Reddings to the South East. The highway is a single carriageway with a width approximately 7.3m. Grovefield Way is street lit with a combined cycleway/pedestrian footway with small grass verge creating a buffer to the carriageway on the eastern site. There is a new footway on the Western side of Grovefield Way, approximately 85m in length, and terminates at a pedestrian tactile crossing to the Eastern side. This crossing was granted permission as a part of the access arrangements for the BMW car sales garage.

A40:

The A40 is located approximately 500m to the North East of the development site and is accessed via the Arle Court Roundabout. The East and West bound carriageways are duelled with two through lanes in either direction. The Arle Court Roundabout is signal controlled on the major A40 approach arms but is not signalled on the Hatherley Lane, B4063 Gloucester Road and Fiddlers Green Lane approach arms.

Personal Injury Collisions:

I have undertaken an interrogation of all recorded personal injury collisions between the period 1st January 2013 and October 2018. During that study period there has been 12 recorded personal injury collisions of which 9 were recorded as slight injury and 3 were recorded as serious injury.

The collisions reports attributed the causation factor as driver error or misjudgement rather than attributing blame upon the highway and its layout. Therefore, there are no highway safety deficiencies in the proximity of the proposed development.

Detailed application Access and Layout:

The development is to make use of an existing priority junction with Right turn holding lane constructed for the BMW car sales garage. The access is suitable for the expected levels and type of traffic, with footways extending into the site either side of the main access road which has a width of 7.2m complying with the local design guidance as shown by dwg 178-96 Rev F. A number of dropped kerb, tactile crossing points are located along the access road at points of pedestrian desire to the surrounding uses. The internal junctions provide adequate emerging visibility splays to ensure that the layout minimises conflict between traffic, cyclists or pedestrians.

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Drawing 178.59 Rev D - ALDI HGV Tracking demonstrates the vehicle manoeuvre required for a 16.5m articulated HGV to access, turn and egress the site in forward gear. The HGV will require a reverse manoeuvre through the western portion of the ALDI car park in order to access the service yard, this will not take place without a suitably trained banks-person ensuring that vehicles and/or pedestrians do not come into conflict with the HGV. To ensure that direct contact cannot occur between the HGV and nursery occupants a fence has been installed between the nursery and car park to ensure that children are prevented from directly entering the car park. The Tracking plan is supported by a delivery management plan which can be secured by planning condition. The Articulated HGV can adequately enter, turn and egress the site to and from Grovefield Way with out conflicting kerb-lines, vertical structures, trees or formal parking spaces.

Office block 5, which sits on the area previously dedicated for a drive-thru coffee shop, has a layout consisting of two cul-de-sac's with parking on either side of them. There is a central pedestrian footway that links to the footway adjacent to the main Estate access road to the north as well as a link to the Aldi store to the south. Drawing 178-116 demonstrates that Office block 5 can be adequately serviced by a 3 axle refuse vehicle. This is the largest expected vehicle to need to enter this part of the development.

The Happy Days Nursery can also be adequately serviced as demonstrated by plan 178.60 Rev E - HDN Refuse Tracking. A Delivery Management Plan has also been submitted and will be secured by condition.

Drawing 178-63 Rev G - Office Accommodation Refuse Vehicle Tracking has demonstrated that two HGV's can adequately pass one another on the internal access road. The refuse vehicle can adequately enter, turn and egress the office car park without conflict, with sufficient inter-visibility between vehicles.

Detailed application Parking Provision:

Gloucestershire no longer has parking standards. Proposed development parking provision should be determined using the methodology set out by Paragraph 39 of the NPPF. A parking accumulation study has also been undertaken to demonstrate the suitability of the proposed parking arrangements.

Office block 1 and 2 has a parking provision of 222 spaces. The accumulation study 'Parking Accumulation Feb 17' determined a weekday peak demand of 222 spaces. The Additional Office Block contains 32 spaces. Based on a review of TRICS a 936sqm office block may generate a parking demand of 40 spaces, some 8 spaces more than provided.

The site is accessible to sustainable transport opportunities with regular bus services available within a reasonable walking distance, particularly the services on the A40 to the north east. The development site provides cycle parking and links with the existing cycle facilities on Grovefield Way to ensure safe cycle access and to encourage additional cycle users. Furthermore the office aspects of the development has means of limiting and/or controlling the number of employees that can access the car park which can be supported with Travel Plan measures to encourage alternative travel means and reduce parking demand from the Office Blocks. Furthermore, the end user has the means of managing car parking arrangements on site to minimise the impacts of any displaced employment parking.

The ALDI and Nursery have provided a provision of 104 spaces containing 7 disabled, 12 parent/child and 2 electric charging spaces. The development has provided adequate levels of parking and it is unlikely that any retail traffic will be displaced upon the wider highway network. An additional demand generated by the proposal can be accommodated within the site access road.

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A parking management scheme can be conditioned to ensure that the parking is maintained available for customers of ALDI and the nursery only and not to be used by the office employees.

Outline Application Access:

B1 office 03 and 04 are subject to Outline planning permission with access being considered at this point. Access is provided by a continuation of the main access road from Grovefield way to a car park at the south-western point of the development serving office block 3. A further priority T-junction provides access to a northern car park to serve office block 4. The extension of the access road to provide access is suitable. The priority junction can support two-way working and provides adequate visibility. It must be noted that landscaping plan DLA-1755-L.09. Rev C demonstrates tree planting within the visibility splay. The splay should be maintained clear with any planting and landscaping being located behind the splay. This can be secured by way of planning condition.

The internal layouts and parking provisions for office block 3 and 4 will be agreed at reserved matters stage and details of can be secured by planning condition.

Permitted Trip Rates Vs Proposed Trip Rates:

The following table outlines the difference in trips between the consented (2014) and proposed (2016/2017) and current 2018 development proposal as outlined in TA Technical Note 03.

Overall Trip Rate Summary:

2014 AM (Consented) 441	2014 PM (Consented) 460
BMW Garage (Committed) 111	BMW Garage (Committed) 111

Total AM Trips	Total PM Trips
Consented/Committed 552	Consented/Committed 571

2016/7 AM (Proposed) 459	2016/7 PM (Proposed) 476
Total AM Trips 2016/7 570	Total PM Trips 2016/7 587
Total AM trips 2018 565	Total PM Trips 2018 581
2016/7 Difference +18	2016/7 Difference +16
2018 Difference +13	2018 Difference +10

The table above demonstrates that the proposed mixed used development will generate an additional 13 vehicle trips in the AM and an additional 10 trips in the PM weekday peaks compared to the extant permission. This is an improvement on the 2016/7 application which would have seen an additional 18 AM and 16 PM peak hour trips. The previous proposal was deemed acceptable, therefore the current proposal is also deemed acceptable as it generates fewer development trips. The impact is being considered in the weekday peak periods due to the background traffic that occurs at weekends being lower as well as the office blocks unlikely to be occupied at those times.

Base Traffic Flow Review:

I have obtained traffic flow data for Grovefield way and Hatherley Lane (North) between the Grovefield Way and Arle Court roundabouts. The traffic flow data was undertaken by GCC. The Grovefield way and Hatherley Lane north surveys were undertaken during the month of March 2017. I have not considered the week 13th - 19th March as this is Cheltenham Gold Cup week and the area may have been subject to extra-ordinary traffic flows which would not be representable of a typical day in that location.

The Grovefield Way ATC recorded a 5 day (workday) average of 920 movements in the AM peak (8-9am) and 928 movements in the PM (5-6pm) peak. 624 (67.8%) were routed northbound towards the Grovefield Way roundabout in the AM peak. 579 (62.39%) were routed southbound in the PM peak.

The Hatherley Lane (North) ATC recorded a 5 day (workday) average of 1872 in the AM peak and 1941 in the PM peak. 882 (47.11%) vehicles were routed eastbound towards the Arle Court roundabouts in the AM peak whilst 989 (49.5%) were routed westbound towards the Grovefield Way roundabout in the same period. During the PM peak 924 vehicles were routed eastbound and 1017 westbound.

The GCC ATC survey undertaken on Hatherley Lane (North) is comparable in terms of traffic pattern to the survey undertaken by the applicant and attached as appendix A of the Transport Assessment.

The ATC surveys have demonstrated that vehicle flow is high within the Local Highway Network. The development will generate an additional (13) vehicles in the AM and (10) in the PM peak hours as a result of the removal of the coffee drive-thru, giving a small network benefit compared to the previous 2016 application. The additional vehicles on top of the base flow and previously consented trips would not be regarded as a significant increase given the high levels of background flow. The previous planning history cannot be ignored and the sites extant permission will generate additional vehicle movements within the Grovefield Area. The previous permission can be implemented at anytime and the impact of which was deemed acceptable. The current proposals additional vehicle trips on top of what could occur is not significant.

Travel Plan:

A framework Travel Plan has been submitted as part of the application. The aim of framework Travel Plan is to act as an 'umbrella plan' for the site as a whole. Each individual use of the site will be required to provide their own site/use specific Travel Plan prior to occupation. To comply with GCC's Travel Plan Guide, monitoring should occur on an annual basis. Details of a Travel Plan can be secured by way of planning condition.

Summary Comments:

Grovefield Way and the local network to Arle Court Roundabout are constrained with high traffic flow and queues/delays at peak times. This may make the additional vehicle traffic generated by this development seen significant when assessed or viewed in isolation, however the previous extant permission carries significant weight in planning terms and must be considered when assessing the current proposal. Although each application has to be assessed on their own merits, this site has previously been deemed acceptable for development in planning terms for B1 Office Use. The number of additional trips generated by this current application compared to the extant permission, which can be implemented at any time, is not significant.

I recommend that no Highway Objection be raised subject to the following condition(s).

Full Application Conditions:

Condition #1 Construction Method Statement:

Throughout the construction [and demolition] period of the development hereby permitted provision shall be within the site that is sufficient to accommodate the likely demand generated for the following:

- i. parking of vehicles of site operatives and visitors;
- ii. loading and unloading of plant and materials;
- iii. storage of plant and materials used in constructing the development;
- iv. provide for wheel washing facilities

Reason: To reduce the potential impact on the public highway and accommodate the efficient delivery of goods in accordance with paragraph 110 of the National Planning Policy Framework.

Condition #2 Car Parking:

Prior to beneficial occupation of the proposed development, the car parking, turning, loading and unloading facilities shall be provided in accordance with the approved plan and shall be maintained available for that purpose thereafter.

Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises scope for conflict between pedestrians, cyclists and vehicles in accordance with Paragraph 110 of the NPPF.

Condition #3 ALDI Delivery Management Plan:

Upon beneficial occupation of the development, the submitted ALDI Delivery Management Plan shall be adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises scope for conflict between pedestrians, cyclists and vehicles in accordance with Paragraph 110 of the NPPF.

Condition #4 Happy Days Nursery Delivery Management Plan:

Upon beneficial occupation of the development, the submitted Happy Days Nursery Delivery Management Plan shall be adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises scope for conflict between pedestrians, cyclists and vehicles in accordance with Paragraph 110 of the NPPF.

Condition #5 Cycle parking:

Prior to beneficial occupation of the proposed development, the cycle parking/storage facilities shall be provided in accordance with the approved plan and shall be maintained available for that purpose thereafter.

Reason: To give priority to cycle movements by ensuring that adequate cycle parking is provided, to promote cycle use and to ensure that the appropriate opportunities for sustainable transport modes have been taken up in accordance with paragraph 108 of the National Planning Policy Framework.

Condition #6 Personal Planning Permission:

Notwithstanding the Town and Country Planning (Use Classes) Order 1987 and Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and/or re-enacting those orders with or without modification), the premises shall not be used other than as a Discount Food-Store and shall not be used for any other purpose falling within Use Classes A1; without express planning permission.

Reason: Alternative use would require further consideration by the Local Planning Authority because of traffic/parking implications, having regard to the provisions of the Paragraph 109 of the NPPF.

Condition #7 Car Parking Management Scheme:

Details of a car parking management scheme for any B1 office building on site, to limit office employment parking occurring within the retail element of the development during Office opening hours shall be submitted to and approved in writing by the Local Planning Authority. The approved plans shall then be implemented on first occupation of any B1 Office block and adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

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Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises scope for conflict between pedestrians, cyclists and vehicles in accordance with Paragraph 110 of the NPPF.

Condition #8 Travel Plan:

No works shall commence on the development hereby permitted until a Travel Plan has been submitted to and agreed in writing by the Local Planning Authority, setting out;

- i. objectives and targets for promoting sustainable travel,
- ii. appointment and funding of a travel plan coordinator,
- iii. details of an annual monitoring and review process,
- iv. means of funding of the travel plan, and;
- v. an implementation timetable including the responsible body for each action.

The approved Travel Plan and any associated site/use specific Travel Plans shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the opportunities for sustainable transport modes are taken up in accordance with paragraph 111 of the NPPF.

Condition #9 Bus Stop Improvements:

Prior to works commencing on the development hereby permitted, details of improvements to the bus stops located to the south of the development on Grovefield Way shall be submitted to and agreed in writing by the Local Planning Authority. The works shall then be constructed in accordance with the approved plan and made available for public use prior to first occupation of the buildings hereby permitted.

Reason: To ensure appropriate opportunities to promote sustainable transport modes have been taken up and to give priority to pedestrian and cycle movements with appropriate facilities that encourage public transport use in accordance with Paragraph 108 and 110 of the NPPF.

Condition #10 Highway Works, Pedestrian Crossing Points:

Details of pedestrian dropped kerb tactile crossing points across Grovefield Way in the proximity of the bus stops south of the development site shall be submitted to and agreed in writing by the Local Planning Authority, the works shall then be constructed in accordance with the approved plan and made available for public use prior to first occupation of the buildings hereby permitted.

Reason: To ensure that safe and suitable access to the site can be achieved for all users and to give priority first to pedestrian and cycle movements to facilitate access to high quality public transport in accordance with Paragraph 108 and 110 of the NPPF.

Condition #11 Estate Roads:

No building on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public highway to that building(s) have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians in accordance with paragraphs 108 and 110 the National Planning Policy Framework.

Outline Application Conditions:

Outline Condition #1 Estate Roads:

Details of the layout and access, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out in accordance with the approved plans. No dwelling on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public Highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians in accordance with paragraphs 108 and 110 of the National Planning Policy Framework.

Outline Condition #2 Future Maintenance:

No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

Reason: To ensure that safe, suitable and secure access is achieved and maintained for all people that minimises the scope for conflict between traffic and cyclists and pedestrians in accordance with paragraph 108 and 110 the National Planning Policy Framework and to establish and maintain a strong sense of place to create attractive and comfortable places to live, work and visit as required by paragraph 127 of the Framework.

Outline Condition #3 Priority Junction Visibility Splays:

The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 43m distant in both directions (the Y points). The area between those splays and the carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.6m and 2.0m at the Y point above the adjacent carriageway level.

Reason: To ensure that safe and suitable access to the site can be achieved for all users in accordance with Paragraph 108 of the NPPF.

Outline Condition #4 Vehicular Parking, Turning and Loading/Unloading:

The details to be submitted for the approval of reserved matters shall include vehicular parking and turning and loading/unloading facilities within the site, and the building(s) hereby permitted shall not be occupied until those facilities have been provided in accordance with the approved plans and shall be maintained available for those purposes for the duration of the development.

Reason: To create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles in accordance with Paragraph 110 of the NPPF.

Outline Condition #5 Cycle Parking:

The development hereby permitted shall not be occupied until details of secure and covered cycle storage facilities have been made available in accordance with details to be submitted to and approved in writing by the LPA.

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Reason: To give priority to cycle movements by ensuring that adequate cycle parking is provided, to promote cycle use and to ensure that the appropriate opportunities for sustainable transport modes have been taken up in accordance with paragraph 108 of the NPPF.

Outline Condition #6 Fire hydrant:

No development shall commence on site until a scheme has been submitted to, and agreed in writing by the council, for the provision of fire hydrants (served by mains water) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the council.

Reason: To ensure adequate water infrastructure provision is made on site for the local fire service to access and tackle any property fire in accordance with paragraph 110 of the National Planning Policy Framework.

Outline Condition #7 Travel Plan:

No works shall commence on the development hereby permitted until a Travel Plan has been submitted to and agreed in writing by the Local Planning Authority, setting out;

- i. objectives and targets for promoting sustainable travel,
- ii. appointment and funding of a travel plan coordinator,
- iii. details of an annual monitoring and review process,
- iv. means of funding of the travel plan, and;
- v. an implementation timetable including the responsible body for each action.

The approved Travel Plan and any associated site/use specific Travel Plans shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: The development will generate a significant amount of movement and to ensure that the appropriate opportunities to promote sustainable transport modes are taken up in accordance with paragraphs 108 and 111 of the NPPF.

NOTE: Estate Roads - maintenance note

The applicant is advised that to discharge 'Outline Condition #2' that the local planning authority requires a copy of a completed dedication agreement between the applicant and the local highway authority or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

NOTE: Fire Hydrant - Informative

The developer will be expected to meet the full costs of supplying and installing the fire hydrants and associated infrastructure.

Highways Agency

5th October 2018

Council's Reference: 18/01004/FUL

Referring to the notification of Hybrid Planning Application dated registered on 24 September 2018; in connection with the A40 (T) / M5 J11 - seeking detailed planning permission for a 5,034 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m Aldi food retail unit (Use Class A1), 204 sq.m Costa Coffee retail unit and drive-thru (Use Classes A1 and A3), with associate parking, landscaping and infrastructure works and Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission) on land at North Road West and Grovefield Way, Cheltenham,

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Gloucestershire, notice is hereby given that Highways England's formal recommendation is that we:

:

- a) offer no objection;
- b) DELETE
- c) DELETE
- d) DELETE

Highways Act Section 175B is not relevant to this application. (1)

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dft.gsi.gov.uk.

(1) Where relevant, further information will be provided within Annex A.

Annex A Highways England recommended no objections

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application reference 18/01004/FUL and has been prepared by Gemma Mckeown, Planning Manager - South West.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current requirements as detailed in DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development " and the DCLG National Planning Policy Framework (NPPF).

Statement of Reasons

Highways England has previously submitted a planning response to the Local Planning Authority - Cheltenham Borough Council on 7 February 2017, 12 April 2017 and 24 August 2017, regarding the Planning Application submission (16/02208/FUL). This included 5,034m² of commercial office space (Use Class B1), 502m² day nursery (Use Class D1), 1,742m² supermarket food retail unit (Class A1), a 204m² coffee shop retail unit and drive-thru (Use Classes A1 and A3), with associated parking, landscaping and infrastructure works, with all matters reserved (except access).

Following submission of an additional Transport Technical Note dated 25 September 2018 Highways England understands that the current proposals include a revision to the proposed development schedule, which replaces the 287 sq.m Costa Coffee drive thru with a 936 sq.m B1 Office.

This change in quantum results in a five vehicle reduction (two-way vehicle trips) in both the AM and PM peak hours and 79 vehicle reduction during the Saturday peak hour.

Overall, the B1 office space would generate 21 two-way vehicle trips in the AM peak hour and 18 two-way vehicle trips in the PM peak hour.

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The detailed development now comprises the following:

- Three B1 office buildings (7,529sq.m. GFA) with ancillary parking;
- A1 Aldi discount food retail (2,037sq.m. GRA); and
- D1 day nursery (800sq.m. GFA).

The outline development comprises the following:

- Two B1 office buildings (8,736sq.m. GFA) with ancillary parking.

The development proposals generate a reduced traffic generation of 5 two-way vehicle trips in the AM and PM peak hour respectively and a reduction of 79 two-way trips in the Saturday peak. It should be noted that B1 office trips are likely to comprise new trips as opposed to pass by trips associated with an A3 drive through, however based on the scale of additional B1 use intended, the revised proposal is not considered to be a capacity or safety concerns for the SRN.

Recommendation

Highways England has no objection to the proposal.

The Reddings Residents Association

5th October 2018

CBC planners have confirmed that this application will be placed before the planning committee on 18 October 2018 (2 weeks today).

We have prepared another detailed document which sets out the questions and comments that the residents have regarding the proposal. Such as:

- 1) What about the weekend and evening traffic that the Aldi will generate on Grovefield Way? The applicants transport analysis predicts up to 282 vehicle arrivals and departures every hour for much of the weekend, all into a carpark with a maximum of 102 car park spaces
- 2) What provisions are being made to reduce fume pollution?
- 3) Is it safe for young children to be in a nursery, up to 12 hours a day, in the middle of a carpark, next to the Aldi & office car parks, BMW garage, the congested Grovefield Way, A40 & M5, breathing in fumes?
- 4) What measures are in place to control noise pollution from air conditioning plant on offices, shops, etc., the new queuing traffic, the reversing sirens of delivery lorries?
- 5) How is light pollution to nearby houses to be controlled?
- 6) What opening hours are actually proposed, because none are given.
- 7) When will deliveries be made? Will it be early morning, or late at night and wake me, or my children up?
- 8) How does the economic argument to build Aldi & create 26 jobs compare to being able to create 118 more jobs in an office of the same area?
- 9) Where will all the wildlife go when the proposed planting will be non-native species and very small when planted.

There are many issues that we as residents see with the scheme. There are 5 days left for you to leave your comments, before the consultation closes next Tuesday 9/10/18 and the planning officer writes his report and makes his recommendations to the committee.

Our document is long but there are so many questions that need to be asked to ensure that residents are not ignored and get lumbered with another BMW type problem. In 2 weeks time, the opportunity for you to ask these questions and influence the planning committee may be lost.

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Please make a few minutes to read the attached document, make up your own mind, then leave your comments on the CBC website as soon as possible.

Below we have attached links to the CBC comments page for this application. If the CBC page isn't working, please send your comments by email to the CBC officer addresses given below, or just post them to Cheltenham Borough Council.

<https://publicaccess.cheltenham.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=P94N53ELL7S00>

joe.seymour@cheltenham.gov.uk

planning@cheltenham.gov.uk

dccomments@cheltenham.gov.uk

The Reddings Residents' Association

4th October 2018 - The Reddings Resident's Association

Introduction

1. There is no objection to a B1 development on this site. To date over this and the previous application there have been well over 500 objections raised by residents. The removal of Costa is welcomed, but we must refer to all of our previous comments submitted in respect of this application, the previous application, where they remain unaddressed in the evidence and detail submitted in support of this application. We discuss our concerns below:

Extant outline permission for B1

2. It is accepted that the submitted reports and analysis are based on comparison with "fall back" extant 2014 permission for B1. However, that permission is OUTLINE only. A FULL application is required before any work can start on site and that application would be subject to the same scrutiny as this detailed application is. We also note that the extant OUTLINE permission expires on 23 July 2019.

3. Since 2014, the NPPF has been revised, and the JCS adopted. A new Local Plan has been prepared and forwarded to the inspector. However, the existing 2006 retail policies for Cheltenham are retained.

4. The JCS will have significant repercussions for traffic on Grovefield Way arising from doubling of Park and Ride capacity to 1000 cars, to service the Cyber Park. The Park and Ride is adjacent to this site and is relevant to considerations on this application

5. The Cyber Park traffic evidence to the JCS identifies that a 4-way Junction 10 is required for the development to be viable. CBC Cyber Park team identify that it won't happen until 2025 at the earliest and is likely not to be complete before expiry of the JCS in 2031. In the interim, as the development progresses, the A40 and Grovefield Way (GFW) will have the equivalent of do-nothing/do-minimum scenarios, which will raise traffic flows through Arle Court Roundabout (ACR) to 187% of capacity, and has no proposals for mitigating this impact. There is no account taken for recent variations in traffic conditions on Grovefield Way arising from BMW on this site or from other permissions granted since 2013, which is the date from which the GCC traffic evidence is derived.

6. The 2007 inspector report on this site was strictly restricted to B Class development in the greenbelt, at the request of this applicant. No extrapolation is possible. The inspector anticipated a low rise development with occasional glimpses through trees and hedges. An appeal on the previous application is in progress. It would be wrong to second-guess the

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inspector on the current appeal. The examination will commence for 6 days on 8 January 2019.

7. If the extant 2014 permission was "FULL", then the site would be deliverable and would represent a viable fall-back position. However, it is OUTLINE only and a full application would still need to pass the same "detail" tests as this application. Only limited credence can be paid to it.

8. In the light of the above, we make our comments:

Is there a policy case for non-B1 use on this B1-approved site?

1. The 2007 appeal is restricted to B1 only.
2. The outcome of the inspector's hearing on previous refused hybrid application is not known and must not be second-guessed.
3. The retail policy review/evidence for the JCS has not yet been written. The extant retail policies are saved. The JCS states that until the "immediate retail review" is ready "there should not be a policy vacuum", i.e., Cheltenham's carefully-evolved retail policies and shopping centre selection hierarchy is saved and is not summarily scrapped by the JCS, or the emerging Local Plan.
4. This site is outside any defined "shopping area".
5. There is presently no JCS or Local Plan proposal, or designation, for a "shopping district" at Arle Court. Conformity with Policy RT1 for this hybrid proposal is therefore contested.
6. In respect of hierarchy of shopping centres, i.e., town, then district then neighbourhood, the existing policies create an important policy to preserve the orderly townscape of historic Cheltenham. The NPPF does not invalidate "saved policies", and no conflict between the Cheltenham saved policies and the NPPF has been demonstrated.
7. The existing retail areas near to the site are not a defined "shopping centre" and this site is physically separated from that area by the South West Distributor Road (Grovefield Way). So there are no precedents set.
8. This application is incorrectly described as "Full", because the key B1 job-creating portion (Phase 3) is all outline only. A significant portion of the site approved by the inspector in 2007 for B class usage has already been given over to Sui Generis in the form of the much-maligned BMW garage and show room.
9. BMW has resulted in the loss of land earmarked by the inspector the Park and Ride extension, which was the key reason for determining an "exceptional reason" to permit the B class development. The other key feature in the inspector's decision was the apparent need for a large B class site in Cheltenham. Subsequent studies suggest that the need for B Class sites in Cheltenham has become more acute since then.
10. Accordingly, this application should be Full only, not be Hybrid and outline, especially as the applicant's submitted reports identify some difficulties with the Phase 3 OUTLINE portion, particularly in relation to surface water.
11. The Hybrid portion of the application offers significant potential to secure wider retail use on the site, to the detriment of the office element.
12. On the nearby site, adjacent to Pure Offices and Asda, there is a current application for B1 offices instead of the extant permissioned 27 houses. TRRA are supporting that application following a pre-application consultation with them. In this application and in support of the previous refused application, the developer/agent reported to us significant

B1 interest, hence the proposed change of use. In the interim, overwhelming interest in B1 offices is reported on Honeybourne Place offices, and Ecclesiastical Insurance are relocating after a long search for suitable alternative B1 offices.

13. There are 2 named users for office Nos 5 and 1 on this application site. One of those is the agent. The other is Bloor Homes, whose existing regional headquarters are in Tewkesbury, purpose-built by them in 2007, occupying an area of 461m² (note new office 1 has an area of 2322m²). In 2014 Bloor Homes employed approximately 37 people.

14. At the planning committee on 15 December 2017, the previous hybrid scheme was rejected with wide agreement that the site "had not decided what it wanted to be". It still hasn't, and that is a significant concern for residents.

15. In 2007 the whole site was granted permission for an area of Park and Ride extension and 22,000m² of B1 office, generating 1100 jobs. When the option on the Park and Ride expired, an application for more B1 offices was approved, with a predicted 1200 new full-time jobs. That proposal extended to the whole 6.35 Ha site. BMW occupies 2.2 Ha or 34.6% of the original site as Sui Generis class. The balance of B1 on the site in this application is 4.15 Ha. The non-B1 use area of this application, including the Aldi, Happy Days Nursery and their associated parking is approximately 10,900m² or 1.1 Ha. The phase 2 site area for which detailed permission is sought is approximately 2.5 Ha. The claim that A and D class use will occupy only a small percentage of the site is not understood. BMW, Happy Days Nursery and Aldi will occupy 2.2 Ha plus 1.1 Ha = 3.3 Ha of the whole site, i.e. $3.3/6.35 = 52\%$. If phase 2 is built, Aldi and Happy Days Nursery will occupy $1.1/2.5$ Ha = 44% of the phase 2 area of the site. Until Phase 3 B1 offices are built, non B1 (Sui Generis, A and D class) will occupy 77% of the developed site. If Phase 3 is developed as B1 offices, then A, D and Sui Generis class will still occupy 52% of the whole site. We do not believe that these were the exceptional reasons for B class development in the greenbelt that the inspector envisaged or permitted in 2007.

16. There seems to be a circular argument relating to non-B1 use in respect of retail. No policy reasons for the D class childcare are advanced by CBC, any of the consultees or the applicant that we can see.

17. The application of the retained retail policy RT1 to this site can only relate to "out of centre sites accessible to regular means of transport, subject to RT7". RT7 says "permission outside defined shopping areas will only be permitted where it will not harm a district or neighbour centre". However, the RT7 policy is said to have been deleted in the JCT. This site is very close to 2 large "destination" supermarkets (Asda and Morrisons) and also to a number of small "top-up" shops in Benhall and Up Hatherley. None of these "top up" shops are mentioned in CBC or the applicant's reports, and none are classified as district or neighbourhood shopping areas. CBC and the applicant say that no consideration need be given to them because they are not designated district or neighbourhood shopping centres, so they are not protected by policy, even though many of these shops have served the residents in the area well for 50 years or more. The applicant's economic report for Aldi identifies that 80% of its trade will be "stolen" from these stores. Job losses at those existing stores are inevitable if Aldi succeeds. The sequential test of the retail policies is then used in an attempt to justify this B1 site for retail use on the previous application. It fails the test. The NPPF clearly states that if the sequential test is failed, then the site is inappropriate, yet this is waived. The only remaining policy justification for the use of this site for retail then turns on "accessible by a regular choice of transport". The applicant and Strategic Land Use Team make a case for this. The same agent and experts that represented BMW now submit reports and argument in support of this application, including another travel plan. However, the submitted travel plan for BMW then failed completely within weeks and has caused unresolved severe road congestion, street parking problems for residents and well-publicised problems at the adjoining Park and Ride. Ultimately, this is

now resulting in the need for public expenditure to fit barriers there to try and overcome the problem.

18. The tests for RT1 are therefore not met and we suggest are also completely inappropriate for this non-designated area, until such time that new retail policies have been drafted, consulted upon and a retail policy for this area of Cheltenham is agreed.

19. On 24 July 2018, ie prior to the applicant making his latest submission on 18 September and 25 September, the NPPF was revised. Strategic Land Use Team comments on 28 June 2018 do not now relate to this scheme and use the superseded NPPF to support the application. As such, the Strategic Land Use Team report needs to be revised and made relevant to this application.

20. NPPF paragraph 92d states that it should be ensured that local shops, facilities and services are able to develop and be retained for the benefit of the community. We believe that permitting D and A class development on the site will severely prejudice the survival of many local businesses and will certainly not allow them to develop.

21. Other local established shopping areas, such as Coronation Square, require an anchor store. Aldi would surely be welcome; further it would be located on a well-established commuter road where many journeys would be linked and has a barely-used car park at the rear of the centre which would easily accommodate shoppers.

22. If this "large" Aldi store is meant to service the offices, it is disproportionately large. Residents have been clear that the area is already well served by supermarkets. There will be no "linked" trips associated with the B1 offices and Aldi over the weekend/evening periods, so vehicles will be being attracted into the area, contrary to the principals of modal shift. If the supermarket is intended to service the B1 development, it should be strictly restricted to 08:00 hours to 19:00 hours, Monday to Friday only.

Summary - planning policy

23. If a planning policy case is to be made for variation from B class to A and D classes, then we believe it has not yet been presented either in compliance with the retained retail policies, or the NPPF, for the reasons set out above.

Economic impact

24. As we have previously set out, the applicant's claim to create 1039 jobs is misleading. The recognised sqm area per B1 full time employee is 18.3m². This is the allowance made in all previous calculations made for this site, until the first hybrid application was made in December 2016. In order to support the applicant's claim for employment numbers in the B1 offices, the space per employee has been reduced to 13.8m² by the applicant. This is a reduction of 25%. Applying the same 13.8m²/employee area to the original 22,000m² application would create 1594 full time jobs, not the 1200 claimed at the time. Similarly, the extant 16,800m² outline application would create 1217 full time jobs. So great care is required in making comparisons. The applicant's use of both ft² and m² figures is also confusing. The applicant's submitted letters of intent do not indicate the number of employees that will actually be occupying office numbers 5 and 1. Ridge/Hunter Page refer to "potential to accommodate between 40-50 people in office no 5". Fifty person occupancy would translate to 14.9m² per employee, whilst an occupancy of 40 people amounts to 18.6m² per employee. In 2014, the prospective occupants of office no 1, Bloor Homes, told planners that they were employing 37 people in an office with an area of 461m². With an occupancy density of 13.8m² per employee, office 1 should provide 168 full time jobs by the applicant's reckoning. We note that Bloor's current regional office is in Tewkesbury and that the Ridge/Hunter Page office is in Cheltenham. Relocation of Ridge/Hunter Page is therefore job-neutral for the area in all respects, whilst the relocation of Bloor is from within

the JCS area. We are mindful that there was much publicity about new job creation in the applicant's previous scheme, BMW. In the event, most of the jobs weren't in fact actually new, but came from other branches which were closed (with one being turned into a Lidl and Starbucks).

25. The discussions in the previous paragraph show that the claims for numbers of jobs created are somewhat subjective on this site, and the economic report must be treated with caution. Whatever the "correct" density for full time employment on the site might be, it is not equitable to compare predictions of full time employment between the extant outline permission and this proposal using different occupancy area rates for employees. If the 18.3m² rate is correct, B1 employment for this proposal will only provide 322 full time jobs. Adding the 25 predicted jobs for Happy Days Nursery and 26 jobs for Aldi, this makes a total of 373 full time jobs, not 428 that Hardisty Jones Associates predict. If an occupancy rate of 13.8m² per employee is correct, then a direct comparison with the extant B1 outline permission would create 1217 full time jobs (not 1100), meaning that the hybrid proposal results in a net loss of 178 full time jobs, relative to the extant permissions. This represents a loss to the local economy of £6.134m in annual wages (using the figures given in table 1 of the applicant's economic impact assessment).

26. Over a combined floor area of 2245m², Aldi and Happy Days Nursery generate a projected 51 full time jobs. Using the applicant's occupancy density of 13.8m² per job for B1, 163 full time B1 jobs would be created, i.e., an increase of 111 jobs for the same footprint. The inclusion of the A class and D class buildings on this site does not therefore seem to provide any obvious economic benefit to Cheltenham or JCS area compared to the extant B1 business park that has been granted permission already.

27. The construction phase impacts are considered neutral between the extant outline permission and the proposed hybrid scheme. Both will generate broadly similar impacts and revenue.

28. It is suggested by the applicant that the Aldi supermarket and nursery are necessary to bring forward and promote the B1 development. However, the area is already served by existing nurseries and childminders and has an abundant supply of destination and top-up supermarkets. Most are available within a maximum 5 minutes' walk of the site and all are available within 5 minutes' drive on a "linked trip".

29. Adjacent to the existing Pure Offices/Asda site, 5 minutes' walk away from this site, developers, Robert Hitchens, are seeking permission to build B1 offices, instead of the permissioned 27 houses because of interest in B1 in the area. On the previous hybrid application for this site (refused in December 2017), the applicant advised that there was a great deal of interest in the proposed B1 offices on the proposed site. In September 2018, more than 45 property agents from Bristol, Swindon and the South West came to Cheltenham to tour the construction of 64,000ft² of B1 office space which is being constructed at Honeybourne Place. The B1 offices will be ready in 2019 and are located in an area which is roughly equal to The Reddings and no retail or childcare elements are included. The Honeybourne Place development is described as having potential occupiers from within the town and new entrants to Cheltenham. It will offer available space ranging between 1000 and 7000ft² on the ground floor to 11,600ft² on upper floors. Both Honeybourne Place and this site are in locations with good transport links and both have similar architectural features, including limestone, large glass screens and cladding. Honeybourne Place is also close to existing supermarkets, and similar the facilities to those that already exist close this proposed site. It is predicted to attract rents of £30 per ft². The significant difference is that the developers of Honeybourne Place have "backed themselves" and constructed the building to attract the tenants. In the Ridge/Hunter Page letter of 21 September 2018, Mr Fong says that "there are limited opportunities to acquire modern office accommodation within Cheltenham simply because very little has been built over the previous years..... as a consequence of the existing stock that does remain is

quickly taken up and office rents have risen considerably and become prohibitively expensive for many businesses". In the December 2017 committee debate, Councillor Wheeler identified sources at GCHQ which said if it was built they would be very interested. All of the foregoing suggests that there is considerable demand for B1 offices. This was recognised by the inspector in 2007 and formed one of the exceptional reasons for permitting development in the greenbelt. If this hybrid application is approved then at completion of phase 2, 77% of the site will be occupied by Sui Generis, A and D class buildings and only 23% will be B1. Bloor will be relocating within the JCS area to occupy office 1 and Ridge will be relocating from a Cheltenham town centre office to office 5, leaving only office 2 as a speculative development offering 2756m² of B1 office. We are concerned that this demonstrates little determination on the part of the applicant to develop a B1 business park.

30. Since the hard-won permission to build prime B1 offices on prime greenbelt was awarded in 2007, 33% of the site has already been given over to Sui Generis purposes for the BMW garage and showroom. It was said this would bring forward B1 development and create jobs. It has not. Subsequently, the applicant has sought to make a case that a drive-through Costa, an Aldi supermarket and childcare facility are necessary to bring forward B1 offices, but they only suggest that they will build phase 3 at some time, following completion of the A class and D class buildings. Further, having constructed the BMW building on a part of the site that the applicant seeks to separate from this application, the applicant has managed to wrestle this portion of the site out of the greenbelt before it has been built. Following granting of planning permission for the BMW development, numerous variations were then applied for and permitted including to: make the building higher; longer; vary the fencing; cut down protected trees; and redesign the stormwater storage and disposal because the "experts" reports submitted to the planning committee were wrong. With the applicant committing to only constructing a small percentage of offices as a part of the full application whilst leveraging the figures to promote and advocate it by promising "jam tomorrow" with the B1 development in phase 3, there is very real concern that once A class and D class as well as Sui Generis have been permissioned on this important B1 site, further use classes will be introduced at the expense of the B1 employment for which this important greenbelt boundary buffer was sacrificed.

RESIDENTS' CONCERNS AND ABSENCE OF CONSULTATION

Application form

31. There is no application form available on CBC website. As such, residents and others, including the officers and planning committee, are unable to determine the opening hours proposed. Previously the opening hours for Costa (A3 class) were 05:30 to 23:00 daily. This was considered unreasonable and excessive and must not be implied in any permission that may be granted in respect of this application.

32. Confirmation of opening hours for Aldi, Happy Days and the B1 offices and the proposed delivery times and schedules must be clearly stated by the applicant.

Environmental

33. Since the site strip and stockpiling of soil on this site associated with the BMW works, those areas of the site that have not been used as a builders' yard have re-established their former greenbelt condition and some of the wildlife and fauna that was displaced during the BMW works has returned. These include deer, hedgehogs, slow worms, bats and many insects and protected bird species. It is noted that there has been no environmental report submitted or requested, and no environmental consultee request has been made. This is not acceptable and a new report/consultation is required.

34. The proposal does not seem to include provision of any bat/mammal/insect boxes or habitats, save for gabions, to replace the lost natural habitats.

35. The BMW works on this site led to extensive removal of natural habitat hedging and trees. The applicant seems to state that the existing mature, dense, tall and well-established hedging and trees along the North Road West boundary can and will be retained and enhanced. However, reference to the applicant's drawings, in particular, Section B-B, J-J (2/2), Section H-H (2/2), section G-G (2/2) and section D-D (2/2), Section C-C (2/2), clearly show that North Road West will be at considerably higher level than the excavated ground level that is proposed for Aldi. This is achieved by forming a sloped embankment between them. This is best illustrated on the Bayley's Landscape Architect's drawing entitled "Landscape sections" (drawing reference DLA.175.L.13.RevB). This drawing shows Aldi and profiled embankment, together with North Road West. The site boundary position is marked, but the re-profiling of the soil to form an embankment extends beyond the site boundary to the kerb edge. It seems that an embankment of between 1.5-2m depth is being formed. It is not understood how this can be formed, and the existing hedge can still be retained. The excavation work will surely require removal of the native hedge, but in any event, excavation this close to the existing hedging and trees is contrary to the relevant BS5837-2012 Trees in Relation to Building. Comments from the Tree Officer and applicant are requested.

36. Non-native trees and shrubs seem to be being proposed. There are no comments regarding the effect of this policy which will result in the loss of indigenous environment. Will the non-indigenous planting that is proposed have a positive effect upon the existing native mammals, flora, fauna, insects and birds? We would be pleased to hear from an appropriate consultee on the matter.

37. Light intrusion is a significant concern. Vehicle lights traversing the Aldi and office 5 car parks and those leaving the site, will shine directly into the houses and gardens opposite. This will be exacerbated in winter when daylight hours are shorter and the deciduous hedgerow on the opposite side of Grovesfield Way has shed its leaves. Proposed tree screening for the site will not mitigate the problem as it is currently shown.

38. Background light pollution from the visibility and security lighting on the car parks and buildings is similarly of concern. Aldi in particular will require high levels of security compared to B1 offices, and the extended opening hours beyond those of a B1 office, particularly into the evenings and over weekends are a significant concern. Consequently, retail will require much greater external lighting than the extant B1. No details are provided with regard to the provisions to mitigate light pollution from the car park lighting, nor whether buildings will remain lit overnight, as unenvironmentally-friendly BMW currently do. The scheme approved by the inspector in 2007 included light purging shutters to protect residents from light pollution. Comment from the Environmental Health office and applicant would be welcome.

39. Reflection of headlights and sunlight of the glazed facades, particularly of office 5, require consideration in terms of potential road hazard/nuisance to residents.

40. No roof plans have been submitted. This is of concern. The offices have much glazing and will attract a good deal of solar gain. There is no indication of how this will be dealt with. Lifts are shown in the building, but there is no indication of where plant will be located.

41. There is no indication of how ventilation is to be provided to the buildings. It seems very likely to us that air conditioning will be required and air source heating may also be provided. Certainly, we would expect some Photovoltaic cells to be provided on the roofs to offset carbon emissions and comply with Part L of the Building Regulations. Presently, there is no acoustic screening shown on the roofs, only a small partial parapet, so there is no architectural detailing of how acoustic screening would be provided. Further, the acoustic report deals only with the external freezer plant for Aldi and there is no mention of mechanical or electrical equipment requirements and noise for the offices or Happy Days

Nursery. A revised acoustic report is required. Comment should be sought from the Environmental Health team.

42. A current application 18/01180/FUL for the erection of three-storey B1 office buildings to the rear of Nuffield Hospital/adjacent to Asda and Pure Offices has been subjected to considerable, vigorous environmental investigation. Drainage calculations, noise assessments, external light assessments, sun path assessments, amongst other specialist reports and drawings have been requested by CBC officers and consultees, and they have been provided. In that application, the roof heating and cooling plant is to be screened by the provision of 3m high louvered panels on the roof around the plant area. Unscreened, the plant noise emission is in the region of 70 decibels when heating and 64 decibels when cooling. With the acoustic screening, this is reduced to a range of between 40 decibels to 34 decibels. Further design statements and submissions are required from the applicant and the Environmental Health team to clarify please.

43. The present acoustic assessment report refers to background noise monitoring that was derived prior to the opening of BMW. Since BMW opened, Grovefield Way is regularly backed up from the Park and Ride roundabout to The Reddings roundabout and it can take over 20 minutes to make that short journey during rush hour. Grovefield Way is often congested for between 3-4 hours each day (Monday to Friday) during rush hour, most significantly, during the afternoon periods between 15:30 to 16:30 hours. This can be verified by simple reference to traffic data on googlemaps). The noise from the stationary/slowly-moving traffic is considerable and beyond the level at which normal conversation can be held walking along the pavement. In some instances, the pavement is not very far from some of the residents' houses. The acoustic report is therefore now out-of-date and misleading. A further updated report must be submitted.

44. The acoustic report does not detail the noise intrusion of reversing vehicle sirens. This omission must be rectified and the effect on residents should be determined in relation to the delivery plan proposals for the A class and D class buildings. Presently no firm details are provided in respect of delivery times.

45. The stationary traffic referred to above will be significantly exacerbated by the "fall-back" extant outline permission for a B1 development. The traffic analysis projects in the region of an additional 600 vehicle movements during the rush hour period on Grovefield Way for this development. The congestion on Grovefield Way (which is the South West Distributor road) will inevitably become worse and the increase in stationary traffic over longer periods of time will further raise the local pollution levels, which are already causing a significant concern for residents. There is no analysis or comment offered by the applicant or Environmental Health officers in this connection. Residents' concern is further exacerbated by the applicant's traffic monitoring having been undertaken prior to BMW opening and during a non-neutral month (early July) when people that are not tied to school holidays by children take their holidays (as they do in September), thereby significantly reducing the traffic. Further, the figures reported in the traffic assessment analysis assume a modal shift. These same consultants produced a broadly similar report and modal shift projections, based upon the travel plan submitted for BMW. However, BMW reported to councillors shortly after opening that they have been unable to implement it. Consequently, there are very many more traffic movements, more stationary traffic and parking issues than these "experts" predicted then, and more than they model now. CBC have been asked to enforce the travel plan with BMW ...

Please note, the remainder of this consultation is available to view as a separate document, attached to the agenda.

GCC Local Flood Authority (LLFA)

9th August 2018

Further to my earlier response to the above application dated 14 June, 2018 (Comments viewable in documents tab) I have reviewed the additional information received and have discussed the issues arising with the applicant's engineering consultants.

I am satisfied that the surface water runoff from Phase 2 of the development will be discharged at the controlled rate equivalent of the Greenfield QBar runoff rate of 8.4 l/s and will be attenuated in the balancing pond together with the runoff from the access road from Phase 1. The controlled discharge will be amended from this pond to the total of these two rates at 10.2 l/s.

It is proposed that the surface water discharge from Phase 3 of the development is also restricted to the appropriate Greenfield QBar runoff rate of 5.7 l/s and that this is also discharged into the ditch north of the development. This rate is also acceptable to the LLFA with attenuation being provided on site sufficient for the 1 in 100 year rainfall event plus climate change.

It is understood that the ditch situated on the northern boundary of the site which is proposed to receive the developments surface water subsequently discharges into a 1250mm culvert underneath the adjacent A40 highway. It is understood that this culvert is maintained by the Highway Agency.

Following discussions with the applicant's engineering representatives it is clear that there is some concern regarding exceedance flow routes in excess of the 1 in 100 year storm for the Phase 3 development. There will be some relatively minor exceedance flows for the 1 in 100 year event which can be accommodated within the planned car parking area to this Phase but no detail is yet known of a satisfactory flow route for the greater events. It is understood that with the current design, exceedance flows for Phase 3 could enter a private underpass beneath the A40 highway.

The LLFA has no objection in principle to this application but the route of the exceedance flows remain unknown for Phase 3 and in order to protect this overland route the LLFA seeks additional information that exceedance flows can be managed safely, either with sufficient capacity within the existing culvert or that they do not pose a danger to the public.

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

Natural England

12th June 2018

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Badgeworth Site of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected sites.

Natural England's advice on other natural environment issues is set out below.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

28th September 2018

Thank you for your consultation. Natural England has previously commented on this proposal and made comments to the authority in our letter dated 12 June 2018.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Tree Officer

14th June 2018

Following application no 16/02208/FUL, several of the tree related comments have been satisfactorily addressed.

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1) New evergreen oak, and hornbeam have been described in planting proposals plan Drawing no 2 of 3 of drawing no DLA PL07 Revision D). Similarly hedgerow planting details alongside North Rd West are acceptable. However there is no aftercare or maintenance plan to accompany such planting proposals. Such aftercare and maintenance is essential if this hedge is to promptly establish and thrive.

Similarly, no details are apparent regarding pruning proposals regarding the existing hedge. This hedge is ecologically diverse but is not in a good condition and management proposals need to take account of proposed new planting as well as for the long term health and effectiveness of the hedge (in terms of its use as a barrier, screen, and ecological diversity).

2) It is noted that there are no planting proposals for new trees along the A40. Whilst it is recognised that the existing wooded strip is both on and outside the boundary of the site, arrangements must be made for new planting of suitable native species (eg hornbeam, holly, oak, hawthorn, blackthorn, field maple etc). This will pre-empt the area becoming most apparent when viewed from the A40. Such new planting will also reduce perceived traffic noise and air pollutants from the adjacent A40 onto nearby residential areas.

As stated previously, this existing woodland is chiefly composed of ash and elm trees and as such are facing an uncertain future as a result of Dutch Elm Disease and Ash Die-back. Local agreement must be reached with Glos County Council so as to address this future problem now as well as enhance the appearance of the site into the future.

3) There are still no soft landscaping details evident for the westernmost (ie adjacent to Elmfarm) part of this site. Such landscaping details must be submitted and agreed.

4) Trees 43, 45 + 46 of the tree survey need to be replaced.

5) Whilst there is no objection to the removal of trees 28 and 35, this is a good opportunity to increase tree planting stock locally-as such, details of tree planting adjacent to as well as south east of T28 should be submitted and agreed. Native trees tolerant of existing ground conditions should be planted. It would be preferable of such trees are of a species which spend long periods in leaf (eg oak, alder, holly, hornbeam etc)

6) Appendix D of Treework Environmental Practice describes fencing for low intensity activity. This is not acceptable and all protective fencing must be to Fig 2 of BS 5837 (2012). *20th July 2018* - Following receipt of email including aftercare and maintenance plan from Hinton Group 10/7/18, CBC Trees are content that aftercare and maintenance should be sufficient to ensure trees, hedges establish and prosper until maturity. Please use condition:

TRE01C - Existing trees to be retained in any permission granted.

The proposal to flail the hedge running along-side North Road West to 2 metres will remove screening temporarily but will help ensure the hedge becomes more dense and also help facilitate the new planting along this hedge line.

CBC Trees are content that Elm Farm landscape proposals are submitted as reserved matters.

Please use condition TPO04A - Replacement Trees Required to ensure the replacement of trees to be removed as shown within Treework Environmental Practice report.

13th July 2018

Following receipt of email including aftercare and maintenance plan from Hinton Group 10/7/18, CBC Trees are content that aftercare and maintenance should be sufficient to ensure trees, hedges establish and prosper until maturity. Please use condition:

TRE01C - Existing trees to be retained in any permission granted.

The proposal to flail the hedge running along-side North Road West to 2 metres will remove screening temporarily but will help ensure the hedge becomes more dense and also help facilitate the new planting along this hedge line.

CBC Trees are content that Elm Farm landscape proposals are submitted as reserved matters.

Please use condition TPO04A - Replacement Trees Required to ensure the replacement of trees to be removed as shown within Treework Environmental Practice report.

New more robust tree protective Fencing is to be confirmed.

Environment Agency

30th May 2018

Thank you for referring the above application to us for consultation.

Based on the information submitted this appears to be a lower risk planning consultation which does not require direct consultation with us; it does not fall within our 'consultation filter'. Our checklist that was submitted with the application suggested the site was within 8m of a main river, however, having reviewed the site using our Flood Map for Planning we can confirm that the adjacent water course is designated as an ordinary watercourse. Therefore, this comes under the jurisdiction of your Lead Local Flood Authority.

INFORMATIVES

1. For our flood risk comments please refer to our Area Flood Risk Standing Advice.
2. For contaminated land matters, you are advised to seek the comments of your Environmental Health Officer or Contaminated Land Officer, with reference to our 'Developer Guidance' sheet.
3. For foul drainage matters, you are advised to seek the completion of the 'Foul Drainage Assessment Form' for your consideration.
4. For Pollution Prevention and Environmental Permit requirements (separate to planning) you are advised to refer to our 'Developer Guidance' sheet.

I trust that the above confirms our position.

Strategic Land Use Team

28th June 2018

(Comments viewable on line)

9th October 2018

Updated policy considerations in relation to application 18/01004/FUL: Land at North Road West /Grovefield Way, Cheltenham. This is a hybrid application seeking detailed planning permission for:

- o 5,914 sq.m of commercial office space (Use Class B1),
- o a 502 sq.m day nursery (Use Class D1),

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- o a 1,742 sq.m supermarket food retail unit (Class A1), with associated parking, landscaping and infrastructure works.

And outline planning permission for:

- o 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved (except access).

This is a resubmission of the previous application reference 16/02208/FUL.

The site

The application site comprises approximately 4.15 hectares of land adjacent and to the north-west of Grovefield Way and to the south of the A40. It can currently best be described as vacant agricultural land.

On the western edge of Cheltenham this site is surrounded by a mix of residential, commercial and employment uses including Arle Court Park & Ride facility to the north east, commercial development including an ASDA Supermarket to the east, and residential development at the Reddings to the east and south east. A new BMW Dealership to the north east of the site has recently been completed. The site no longer falls within the Green Belt, since the adoption of the Joint Core Strategy in December 2017.

The site already benefits from an extant planning permission for B1 employment use but according to the applicant, this revised application (which reflects two distinct development phases) is now necessary to allow a more flexible approach to the timing of development on the site. The application being considered here is a resubmission of application 16/02208/FUL, which is currently being considered through the appeals process.

Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be taken in accordance with the relevant adopted Development Plan unless material considerations dictate otherwise. Since the previous application was submitted for this site, the policy situation has changed with the adoption of the Joint Core Strategy (JCS) in December 2017. Therefore, in determining this application, the following must be considered:

- o The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, 2017 and its evidence base.
- o The saved policies of the Cheltenham Borough Local Plan (CLP) Second Review 2006, which comprise the adopted development plan, and;
- o Relevant material considerations which include:
 - o National Planning Policy Framework (NPPF)
 - o National Planning Practice Guidance (nPPG)
 - o The emerging Cheltenham Plan and its evidence base.

Core issues in this case

The following are considered to be core issues in relation to this proposal and are considered in turn in the pages that follow:

- o The need for sustainable development;
- o Development of a retail establishment on an out-of-centre site;
- o The site's retention solely for B1 uses as originally granted by planning permission in 2007.

The need for sustainable development

NPPF

Paragraphs 7-10 set out the definition of sustainable development highlighting and reinforcing the three dimensions - economic, social and environmental - and that new development should seek to achieve net gains across all three.

Paragraph 11 sets out the presumption in favour of sustainable development, for plan making this requires LPAs to positively seek opportunities to meet the development needs of their area. In meeting these needs, the Framework requires that LPAs should objectively assess their needs with sufficient flexibility to adapt to rapid change. For decision-taking this means:

- o approving development proposals that accord with the development plan without delay; and
- o where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - o any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - o specific policies in this Framework indicate development should be restricted.

Paragraphs 80-82 seek to build a strong, competitive economy and re-iterate and expand on the core principles.

Gloucester, Cheltenham, Tewkesbury Joint Core Strategy

Policy SD14 requires development that does not have an adverse impact on the health and environmental quality of the area, including that of the neighbouring occupants.

Policy INF1 relates to impacts of development on the transport network, and encouraging use of sustainable modes of transport both within the development and adjoining to the existing network.

Cheltenham Borough Local Plan

Policy CP3 seeks to promote a sustainable environment. It sets out that development will only be permitted where it would not harm the setting of Cheltenham, not harm the landscape, conserve or enhance the built environment, promote biodiversity and avoid pollution and flooding.

Development of a retail establishment on an out-of-centre site

NPPF

Paragraph 86 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.

Paragraph 89 states that when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment subject to the proposal meeting a 2500m² floorspace threshold.

Gloucester, Cheltenham, Tewkesbury Joint Core Strategy

Policy SD2 Identifies the Key Urban Area of Cheltenham and encourages this area as the focus of the community. Furthermore the policy sets out the retail floor space requirements for each of the JCS authorities. However, more detailed retail policies are not provided in the JCS, but will be in the retail review of the JCS.

Cheltenham Borough Local Plan

Policy RT1 relates to the location of retail development and states:

Retail development will be permitted, subject to the availability of suitable sites or buildings suitable for conversion, which relate to the role and function of retailing centres and their catchments only in the following sequence of locations:

- a) the Central Shopping Area, subject to Policy RT 2;
- b) the Montpellier Shopping Area or the High Street West End Shopping Area, subject to Policy RT 2;
- c) elsewhere within the Core Commercial Area, subject to Policy RT 1;
- d) district or neighbourhood shopping centres, subject to Policy RT 3;
- e) out-of-centre sites which are accessible by a regular choice of means of transport, subject to Policies RT 7 and CP 5;

In considering the location of retail development, developers and operators should demonstrate flexibility and realism in format, design, scale and car parking.

The site's retention solely for B1 uses

NPPF

Paragraph 80 states that:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Gloucester, Cheltenham, Tewkesbury Joint Core Strategy

SD1 states the locations where employment related development will be supported.

Cheltenham Borough Local Plan

Policy CP6 states that mixed use development will only be permitted on suitable sites that meet the following criteria:

- a) where the uses are compatible with each other and adjoining land uses; and
- b) for schemes attracting a significant number of trips only in the Core Commercial Area; or
- c) for other schemes, only in the Core Commercial Area, district or neighbourhood centres, or in locations which are highly accessible by a regular choice of means of transport, excluding the residential parts of the conservation areas.

The policy also notes that where mixed uses are proposed on employment land, proposals will be subject to Policy EM2 (see below).

Policy EM2 seeks to retain land that is currently or was last in use for employment purposes (in the B classes) unless one of the listed exception tests are met. It goes on to state that mixed use development will be permitted on employment land provided that certain criteria are met, including:

- a) 'any loss of existing floorspace would be offset by a gain in the quality of provision through modernisation of the existing site. This should secure or create employment opportunities important to Cheltenham's local economy, and

- b) the loss of part of the site to other uses does not have a detrimental impact on the range of types and sizes of sites for business uses in the area nor the continuing operation of existing business sites; and
- c) the use is appropriate to the location and adds value to the local community and area.'

The site is currently proposed for allocation in the emerging Cheltenham Plan for employment uses (site E3), which was publically consulted on in early 2018. However, in line with the NPPF paragraph 216 in Annex 1 and nPPG relating to Determining a planning application paragraph 014, limited weight should be given to the plan at this stage.

Assessment

The need for sustainable development

The NPPF makes clear that the presumption in favour of sustainable development should underpin decision making and, in this instance, that can be interpreted as meaning granting planning permission unless:

- o any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or
- o specific policies in the NPPF indicate development should be restricted.

The following matters should be considered in making an assessment of whether or not permission should be granted:

Development of a retail establishment on an out-of-centre site

As the proposed development is located out of centre, the NPPF requires the applicant to demonstrate there are no suitable, available and viable sequentially preferable sites that could accommodate the proposed development.

A sequential test has therefore been undertaken and concludes that "whilst allowing for a reasonable degree of flexibility and the requirement for a site to be available immediately, no sites have been identified for the proposed development that are sequentially superior and capable of accommodating the proposed development." The submission identifies that the application site is demonstrably the most appropriate location for the proposed development.

This is accepted and it is noted that several sites including 4 in the town centre have been discounted on the basis of a variety of constraints including the existence of existing permissions.

In this instance, the applicant is not required to undertake an impact assessment because the proposal is smaller than the default threshold of 2500m² (gross) stipulated in the NPPF. However, it is noted that an impact assessment has been undertaken to assist in the determination of the proposal and consider the effect on planned in-centre development and in-centre vitality and viability.

By way of the submission, it is demonstrated that the proposal will result in only a small increase in trade diversion from the town centre over and above that associated with existing commitments in the Borough. It is considered this will have an 'imperceptible' impact on the sustained vitality and viability of the town centre, which remains strong, popular and attractive. It is also identified that the proposal will not adversely affect any other policy-protected centre in Cheltenham.

The site's retention solely for B1 uses

The proposed development contains elements which do not fall within the B1 use. As such, a key consideration in determining the acceptability of the proposed development is whether or not the proposed uses (B1, D1, A1 and A3) sufficiently contribute to meeting the employment needs of the Borough.

JCS Employment Land Review (2011)

There has been a policy shift in recent years in relation to what is considered to constitute employment development and what is now regarded as economic growth. The Cheltenham Borough Council Employment Land Review (ELR) 2011 notes (at paragraph 1.7) the shift in regional and national planning policy that has sought to no longer restrict the consideration of employment uses to B use classes only. Accordingly, other non-B Class employment generating uses were considered as part of the study.

The ELR also notes that the current key non-B Class sectors within the JCS area can be identified as retailing, health and social work and education and goes on to note that, in the light of the anticipated changes in employment levels in the various non B-Class sectors, the aforementioned sectors are likely to become more dominant by 2026.

The above is a factor that has been given due recognition in the new Cheltenham Plan particularly through the emerging policy framework which proposes allowing changes of use to other job generating uses on some of the Borough's existing B-class employment sites. However, it should also be noted that both the JCS and Cheltenham Plan are facilitating additional site provision to help address the identified shortfall in B-class employment land as part of a coordinated approach to employment land management in future.

Previous planning decisions

It is noted that the appeal inspector on the 2007 application did not seek to limit the permission to office development only, but considered the shortfall in local employment land provision amounted to the very special circumstances that justified the granting of permission for B1 use at that time. Given current, similar circumstances, it is not unreasonable to consider this stance is still valid today (although the aforementioned emerging plans are setting out to address this).

In determining the application for the BMW scheme in 2014, the determining officer considered that approving the scheme would not undermine the Borough Local Plan's commitment to retain B-class uses under Local Plan Policy EM2 as the policy was of only limited relevance. Furthermore, that the loss of part of the Grovefield Way site to a Sui Generis Use which has some B-class characteristics would still generate much needed jobs.

The same can be said to be true today; EM2 is concerned with protecting existing or last employment uses rather than unimplemented planning consents and is therefore of little relevance. Whilst it is retail use (rather than Sui Generis use) that has reduced the amount of B-class use within the current scheme, retail still contributes valuable, although different to B-class use, employment opportunities. It is also considered that the proportion of the floorspace proposed to be given over to retail (approximately 12%) is sufficiently small to not overly affect the prospects for future B-class job provision at this location. It should be noted that the NPPF seeks to promote economic growth and does not distinguish between development that falls within B class uses or otherwise.

The previous application of the same description was refused by planning committee in December 2017, currently subject to appeal.

Miscellaneous

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The site is situated within the Environment Agency's Flood Zone 1 posing a low risk to flooding. It is noted the planning application is therefore accompanied by a Flood Risk Assessment as necessary and appropriate.

The site will be accessed from Grovefield Way which runs between the A40 to the north east of the site, alongside the eastern site boundary and then southwards through the Reddings towards Up Hatherley. The A40 provides access to the M5 Motorway some 2km to the west and Cheltenham town centre approximately 4km to the east. It is noted a Transport Assessment also accompanies the application and details impacts on the surrounding road network together with implications on walking, cycling and public transport.

Summary Conclusion

Taking all the above into account and on balance, the Planning Policy Team does not raise any objection to the principle of this scheme.

- o There remains a shortfall in B-class employment land across the Borough as evidenced by both the 2011 Employment Land Review (undertaken for the JCS), and the 2015 Economic Strategy (undertaken for the new Cheltenham Plan).
- o The JCS and its evidence base recognise the overriding importance of B-class employment to the Borough whilst acknowledging that other uses may also have some employment generating characteristics.
- o The retail element of the proposal equates to a very small amount (approximately 12%) of the overall floorspace to be provided, and this small amount is job generating.
- o As it has not proved possible to identify sequentially superior sites at this time, it is accepted that the proposal offers conformity with the priorities of the NPPF (Para 86) and Policy RT1 of the adopted Cheltenham Borough Local Plan.
- o Sufficient evidence has been provided to demonstrate limited impact on town centre and neighbourhood centre retailing arising from the scheme thus affording compliance with the NPPF (Para 89).
- o The application site is situated within close proximity of a number of public transport routes, a number of shops and opportunities for employment, schools and hospitals. It is therefore situated within a sustainable location and conforms to the thrust of national planning policy embodied within the NPPF together with the spatial priorities of the adopted Cheltenham Borough Local Plan, including Policies CP1 and CP6.
- o The emerging Cheltenham Plan proposes allocation of this site in the Pre-Submission version of the plan which was publically consulted on earlier this year.

Historic England

25th May 2018

Thank you for your letter of 24 May 2018 regarding the above application. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

Severn Trent Water Ltd

5th June 2018

Thank you for the opportunity to comment on this planning application. Please find our response noted below:

With Reference to the above planning application the company's observations regarding sewerage are as follows.

I can confirm that we have no objections to the proposals subject to the inclusion of the following condition:

- The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and

- The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.

Cheltenham Civic Society

14th June 2018

The Planning Forum considers the scheme to be broadly acceptable. It is acknowledged that Aldi and Costa are proposing to use what appear to be their standard corporate models but they nevertheless appear unimaginative and bland, as do the boxy office buildings.

We are disappointed, however, that the nursery building appears bleak and austere and we regret the opportunity has not been seized to create an exciting, welcoming building for young people. We would also prefer better provision of outdoor amenity space for the nursery, at a time when young people's physical and mental health is under scrutiny.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	340
Total comments received	178
Number of objections	175
Number of supporting	0
General comment	2

5.1 The application was publicised by way of letters to 340 nearby properties, site notices and a notice in the paper. Over 175 letters of objection were submitted which can all be read in full on the Council's Online Planning Register, however to briefly summarise the main issues raised were as follows:

- Unacceptable loss of B1 office space compared to the previous permission (economic impact).
- More office space unnecessary in Cheltenham.
- No need for additional supermarket or drive-thru coffee shop as other similar facilities already exist nearby.
- Impact on the viability of nearby supermarkets and other retailers.
- Unsuitable location for a nursery. Impact on existing providers and unsuitable for children to be near polluted/congested roads.

- Impact on congestion on local roads and the development would lead to parking on nearby streets. Insufficient parking on site.
- Unacceptable to build on greenbelt.
- Noise from delivery vehicles and other vehicles generally.
- Light pollution.
- Impact on general amenity of neighbouring properties.
- Cumulative impact with the construction of the BMW dealership
- Unacceptable visual appearance and inadequate landscaping.
- Impact on wildlife and ecology.
- Inadequate drainage and potential for increased flooding and run-off.
- Lack of community engagement.

6. OFFICER COMMENTS

6.1 Background

- 6.1.1** The most relevant planning applications that have been determined at this site are outlined in section 2 of this report. The principle of developing the site was first established by the appeal decision in 2007 allowing B1 office development and an extension to the Arle Court Park & Ride.
- 6.1.2** Although the site was in the Gloucester-Cheltenham Green Belt at the time, the Inspector for the 2007 appeal decision found that there were very special circumstances due to the serious shortfall in local employment land provision in the borough. This justified the granting of permission of a B1 office development on a Green Belt site.
- 6.1.3** The permission of subsequent planning applications has maintained the principle of development at this site. These permissions include the BMW dealership, which has been fully constructed, and application 14/01323/OUT for 16,800 sq.m of B1 offices, which has not been implemented, but is still extant until 11 December 2019.
- 6.1.4** On 11 December 2017 the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031 ("JCS") was adopted. The JCS confirmed the removal of the application site from the Green Belt following a ten-year period since the 2007 appeal decision where the site had the benefit of planning permission for development via a combination of time-extension and revised applications.
- 6.1.5** On 14 December 2017 Members resolved to refuse a hybrid (part full, part outline) planning application (16/02208/FUL) for a total of 13,068 sq.m of B1 office space, a 502 sq.m day nursery (use class D1), a 1,742 sq.m supermarket food retail unit (use class A1), and a 204 sq.m drive-thru coffee shop. This refused application is now subject to an appeal which is set for determination at a public inquiry in January 2019.
- 6.1.6** The application in question that was registered in May 2018 is a similar hybrid application for effectively the same development as the refused application. However,

it was since been revised by the applicant as the proposal now includes a two-storey B1 office building in place of the drive-thru coffee shop near the vehicular entrance to the site adjacent to Grovefield Way.

- 6.1.7 The proposed development would now comprise a total of 13,948 sq.m of B1 office space (880 sq.m more than originally proposed), a 502 sq.m day nursery and a 1,742 sq.m supermarket food retail unit. The applicant has also disclosed the named occupiers of two of the proposed office buildings: Bloor (national house builder) and Ridge (multi-disciplinary planning/property consultants).
- 6.1.8 The following sections of this report will address the main issues associated with the proposed development and the concerns raised by local residents. Comparisons will be drawn with the extant planning permission which must be taken as a significant material consideration in the determination of this application.
- 6.1.9 The Reddings Resident's Association (RRA) have argued this is not the case on the basis the extant permission is an outline permission and not a full one. However, the 14/01323/OUT permission establishes the principle of development at the site, it was a key driver in justifying the removal of the site from the Green Belt and the fact that the extant permission is outline instead of full does not make the development any less deliverable or viable. Thus, the extant outline permission still carries significant weight with regard to determining this application.
- 6.1.10 The first three main issues to be discussed comprise the three refusal reasons of the 16/02208/FUL application.

6.2 Employment / Loss of B1

- 6.2.1 This issue comprised the first refusal reason for the previous application. The extant permission is entirely for B1 office use and the introduction of non-B1 uses was judged by Members to be a reason to refuse the development. The refusal reason stated:

The proposed non B1 uses will result in a reduction in the amount of the site available for B1 office development along with the high quality jobs this would provide. The amount of the site given over to non B1 uses in combination with the prominent position they would occupy on the site would result in a dilution of the character and function of the site as a business and represent in inappropriate balance between B1 and non B1 uses. For these reasons the proposal is considered to be contrary to policy SD1 of the Joint Core Strategy, policy EM2 of the adopted Local Plan and emerging policy EM3 of the Cheltenham Plan (Pre-submission version, December 2017).

- 6.2.2 The key issue in terms of the principle of the latest proposed development is the introduction of non-B1 uses and whether these are acceptable. The proposed uses for the site (with proposed end occupiers in brackets) and their respective floor areas are set out below.

Use	Floor Area	Percentage of total floor area
B1 office (Ridge, Bloor and others)	5,914 m ² (full) + 8,034 m ² (outline) = 13,948 m ²	86.15%

A1 retail (Aldi)	1,742 m ²	10.75%
D1 non-residential institutions (Happy Days nursery)	502 m ²	3.1%

- 6.2.3** The table above shows that 86.15% of the total floor area of the proposed development would be for B1 office use. This is following the substitution of the drive-thru coffee shop (A1 use, floor area 204 sq.m) for another office building. The residual non-B1 uses now comprise 13.85% of the total floor area.
- 6.2.4** For comparison, the refused application proposed 84.2% of the total floor area to be for B1 office use. The current proposal would therefore result in an increase in the proportion of B1 development. It is acknowledged that this is a modest increase and the proposal is still not 100% B1, however it still represents a high proportion of the site being used for the use that already has extant permission. Furthermore, the residual uses proposed for the site, while not B1, are still themselves employment-generating uses.
- 6.2.5** For the previously refused application it was estimated that 1,018 full time jobs would be created across the site. For the current application following the substitution of the coffee shop for an office, the estimated number of full time jobs created by the development would increase to 1,039.
- 6.2.6** The numbers have been created using data from the Homes and Communities Agency¹ (H&CA) which calculates the average number of jobs created per square metre for different uses. B1 office uses have a tendency to create more jobs per square metre than any other use, which is a significant reason behind the perceived preference for the creation of B1 office employment over other employment types.
- 6.2.7** It is important to highlight at this point that the extant permission for B1 development did not include a condition removing permitted development rights. This means that if it was implemented and each individual office unit was occupied as B1, up to 500 sq.m of each building on site could be changed to a B8 use (storage and distribution) as this change is permitted by Schedule 2, Part 3, Class I of the Town and Country Planning (General Permitted Development) Order 2015 (“Class I”).
- 6.2.8** This has implications regarding the argument against allowing non-B1 uses such as retail and a nursery at the site because the amount of employees per square metre typically found at B8 uses is far less than any of these uses. For instance, the H&CA data states that B1 offices employ one person for every 10-13 sq.m of floor area; for A1 retail it is one employee for every 15-20 sq.m of floor area and for B8 it is one employee for every 70-95 sq.m of floor area.
- 6.2.9** Taking the median value for B1 (11.5 sq.m per employee) and B8 (82.5 sq.m per employee), for an employment space with an area of 500 sq.m a change of use from B1 to B8 could on average experience a reduction from 43 employees down to 6. It is important to highlight that this is not a precise calculation and due to differences in employer practices, potential future changes in occupants of office buildings and changes allowed under permitted development, pinpointing a precise number of jobs

¹ Employment Density Guide 3rd Edition, November 2015

that would be created by a development is extremely difficult. Hence why the H&CA data is used as a guide only.

- 6.2.10** To avoid the possibility of losing unacceptable levels of B1 floor space to B8 uses via Class I permitted development changes, Officers would be minded remove permitted development rights by condition if planning permission is granted. This would give the local planning authority greater control over the B1 uses at the site allowing it the ability to prevent future B1 to B8 changes, where appropriate.
- 6.2.11** The RRA and other local residents have expressed concerns with the loss of the total number of jobs by allowing non-B1 uses at the site. The RRA estimate that 92 jobs could be gained if the 1,742 sq.m for the proposed Aldi store was used for office space instead.
- 6.2.12** Officers do not dispute that a 1,742 sq.m office would typically employ more people than a retail store of the same floor area when assessed against the H&CA data. However, the following sub-section outlines the local and national policy context in which the proposed development can be supported despite the inclusion of non-B1 floor space.

Policy Context

- 6.2.13** It is important to highlight that in the last year a revised version of the NPPF has been introduced and the JCS has been adopted. The emerging Cheltenham Plan (eCP) has also been submitted to the Planning Inspectorate so its policies now carry a limited amount of weight, but not full weight because it has not yet been adopted. All of these policy documents are not so prescriptive that the site in question must be developed entirely for B1 purposes unequivocally. The need for some flexibility in the type of employment-generating uses is recognised.
- 6.2.14** Policy EM3 in the emerging eCP states for new employment allocations like the site in question (known as E3) that: proposals for traditional B class employment uses or Sui Generis uses that exhibit the characteristics of traditional B class employment will be supported.
- 6.2.15** However, it also states that Policy EM3 reflects the evidence bases of the JCS and eCP. The Cheltenham Borough Council Employment Land Review (ELR) 2011 was an evidence base document that was prepared by Nathaniel Lichfield and Partners on behalf of Cheltenham Borough Council. The ELR notes (paragraph 1.7) the shift in regional and national planning policy that sought not to restrict the consideration of employment uses to the B use classes only.
- 6.2.16** The ELR notes that this shift “represents an important departure from previous strategic guidance which has tended to only consider B Class employment land. Accordingly, and recognising that job creation outside of the B Class sectors make a significant contribution towards employment and economic well-being, other non-B Class employment generating uses are considered as part of this study.” The updated version of the Employment Land Assessment document published in October 2015 further confirms the continued lack of B-class employment land supply compared to anticipated future need.
- 6.2.17** The Cheltenham Borough Local Plan 1991-2011 (“existing Local Plan”) is a time-expired local development plan but it is still a material consideration in decision-making until the eCP is formally adopted.
- 6.2.18** Policy EM2 of the existing Local Plan does not support any proposed change of an employment (B1, B2 or B8) site away from any of these uses in its entirety (except in

certain specific situations) but that is not what the proposal involves. The proposal is an employment-led (B1) scheme (86.15% of the total floor area) with a smaller proportion (13.85%) of A1 and D1 uses.

6.2.19 Policy EM2 seeks to retain land that is currently or was last in use for employment purposes (in the B classes) unless one of the listed exception tests are met. It goes on to state that mixed use development will be permitted on employment land provided:

- a) any loss of existing floor space would be offset by a gain in the quality of provision through modernisation of the existing site. This should secure or create employment opportunities important to Cheltenham's local economy, and
- b) the loss of part of the site to other uses does not have a detrimental impact on the range of types and sizes of sites for business uses in the area nor the continuing operation of existing business sites; and
- c) the use is appropriate to the location and adds value to the local community and area.

6.2.20 The explanatory notes for this policy state that "a great variety of activities can operate satisfactorily within the limits of the B1 use class... and the fact that a business is non-conforming is not sufficient justification for enforcement or refusal of planning permission". Therefore, Officers consider that in light of Policy EM2 the proposed A1 and D1 uses that do not conform to the B1 use class are suitable in this context. As with the previous application, this is an on-balance decision based on the proposed layout, which is discussed in more detail in a sub-section below.

6.2.21 The increase in B1 floor space is now proposed in a more prominent location on the site adjacent to Grovefield Way which, in Officer's opinion, is sufficient to overcome the previous concerns regarding the mix of uses at the site and the prominence of the non-B1 uses. The revised layout with a new office proposed at the entrance to the site reinforces the fact that the non-B1 uses would be subservient to what is predominantly a B1 development.

6.2.22 The existing Local Plan is time-expired (as it ran until 2011) and the eCP has not been adopted at the time of writing. The only local development plan that is both adopted and in time is the JCS. Policy SD1 of the JCS is used for determining applications for employment development (except retail). It is acknowledged that 10.75% of the total proposed development is for a retail unit; the analysis of this element of the scheme is carried out in a separate section of this report below.

6.2.23 The JCS is consistent with the existing Local Plan and eCP in the sense it is not overly prescriptive about supporting only all-B1 developments on employment sites. The application site is not a strategic allocation in the JCS (policy SA1). For other sites JCS policy SD1(iii) says that employment-related development will be supported for the re-development of land already in employment use.

6.2.24 Paragraph 4.2.15 of the JCS explains why employment sites like the application site in question should not be limited solely to the B classes:

"Employment uses, such as retail (covered in policy SD2), leisure facilities, education, health services and residential care (uses outside the 'B classes') are predicted to provide over two-thirds of the projected job growth across the area. Whilst these sectors do not usually generate a specific employment land requirement, the mix of future job opportunities generated will be as important as specifically allocating parcels of land for employment provision. Employment forecasts show that the greatest B-class employment growth will be in the office, research and development sectors (Use Class B1a/b) with a decline in manufacturing and industrial jobs (B2) and with minimal growth in warehousing (B8) sector jobs."

- 6.2.25** In addition to the three relevant local development plans that have been discussed, the National Planning Policy Framework (NPPF) is also a material consideration in planning decisions. Section 6 of the revised NPPF (introduced in July 2018) sets a policy context to help build a strong, competitive economy. It states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.2.26** The NPPF does not differentiate between the various types of employment uses, as it talks in more general terms so that it can apply to different parts of the country. It is considered that the proposed creation of over 1,000 full time jobs (which all of the proposed buildings/uses generating employment) is a significant benefit in terms of helping to achieve the NPPF's aim of building a strong, competitive economy.

Summary

- 6.2.27** Concluding on the issue of employment and the loss of B1 office floor area compared to the extant planning permission, it is considered that the policy context is not so prescriptive that employment sites must be used exclusively for uses that fall within Class B of the Use Classes Order.
- 6.2.28** Policy EM2 of the existing Local Plan states that the presence of other employment uses that are not B1 should not justify a refusal of an employment-generating mixed-use development. Policy EM3 of the eCP was informed by an evidence base that acknowledges job creation outside of the B Class sectors make a significant contribution towards employment and economic well-being.
- 6.2.29** Policy SD1 of the JCS or section 6 of the NPPF does not differentiate between the various employment-generating uses, with the former recognising that non-B class employment-generating uses are set to play a significant role in economic growth for the JCS area.
- 6.2.30** In any event, the proposed development is still a B1-led development with over 86% of the total floor area to be committed to this use. It is acknowledged that the non-B1 uses typically produce a lower ratio of jobs per square metre of floor area, however they are still employment-generating uses and this application is predicted to create 21 more full time jobs than the previous application that was recommended for permission by Officers.
- 6.2.31** The reader is reminded that the applicant could also exercise their permitted development rights to change 500 sq.m of the extant permission from B1 to B8 uses, the latter of which typically produces a lower ratio of employees per square metre than the non-B1 uses being proposed.
- 6.2.32** Having regard to the background of this site, the extant planning permission and the policy context, the proposal is considered to be acceptable in terms of the employment opportunities it will generate. In this instance, the loss of B1 uses compared to the extant permission is not a reason to justify preventing the development. In fact, the policies that have been adopted since the extant permission was granted (in addition to the eCP) are now more encouraging of a mixed-use employment-generating development, instead of insisting on a 100% Class B development.
- 6.2.33** Officers consider that the proposed development is in accordance with the three policies that were cited in the first refusal reason of the previous application at this

site, namely JCS policy SD1, existing Local Plan policy EM2 and eCP policy EM3, in addition to section 6 of the NPPF.

6.3 Impact on the Highway Network

6.3.1 The second refusal reason for the previous application at the site reads as follows:

Due to the mix of uses proposed, the development would result in an increase in traffic on the surrounding road network into the evenings and at weekends in addition to the AM and PM weekday peaks. This would have an unacceptable impact upon the local road network which is already heavily used. For these reasons the proposal is considered to be contrary to policy INF1 of the Joint Core Strategy.

6.3.2 The previous refused application is now subject to an appeal which is set for determination at a public inquiry in January 2019. Following agreement from the Chair and Vice-Chair of the Planning Committee, Cheltenham Borough Council has confirmed to the appellant that they will not be contesting this refusal reason at the inquiry on the grounds that the local highway authority, in this case Gloucestershire County Council, and the Highways Agency, did not object to the previous application (subject to conditions).

6.3.3 Acting on legal advice, it was considered unwise for Cheltenham Borough Council to contest a refusal reason that contradicted the professional judgement of the local highway authority. There have been recent cases where this has been deemed unreasonable behaviour by the Planning Inspectorate and has resulted in the award of costs to the appellant. Costs can be awarded to the appellant even if an appeal is ultimately dismissed.

6.3.4 Notwithstanding the above, the proposed development differs from the previous application so an assessment of its impact on the highway network is still required. The response from the local highway authority can be read in full in section 4 above; the main points from their response are summarised below.

Local Highway Authority

6.3.5 Gloucestershire no longer has parking standards. Proposed development parking provision should be determined using the methodology set out in the NPPF. A parking accumulation study has also been undertaken to demonstrate the suitability of the proposed parking arrangements.

6.3.6 Office block 1 and 2 has a parking provision of 222 spaces. The accumulation study 'Parking Accumulation Feb 17' determined a weekday peak demand of 222 spaces. The Additional Office Block contains 32 spaces. Based on a review of TRICS a 936 sq.m office block may generate a parking demand of 40 spaces, some 8 spaces more than provided.

6.3.7 The site is accessible to sustainable transport opportunities with regular bus services available within a reasonable walking distance, particularly the services on the A40 to the north east. The development site provides cycle parking and links with the existing cycle facilities on Grovefield Way to ensure safe cycle access and to encourage additional cycle users. Furthermore, the office aspects of the development has means of limiting and/or controlling the number of employees that can access the car park which can be supported with Travel Plan measures to encourage alternative travel means and reduce parking demand from the office buildings. Also, the end user has the means of managing car parking arrangements on site to minimise the impacts of any displaced employment parking.

- 6.3.8** The Aldi and nursery have provided a provision of 104 spaces containing 7 disabled, 12 parent/child and 2 electric charging spaces. The development has provided adequate levels of parking and it is unlikely that any retail traffic will be displaced upon the wider highway network. The Aldi located at the junction between Tewkesbury Road and Hayden Road in Cheltenham has a similar floor area and a similar number (103) of parking spaces and it trades without any perceived parking issues.
- 6.3.9** The proposed mixed used development will generate an additional 13 vehicle trips in the AM and an additional 10 trips in the PM weekday peaks compared to the extant permission. This is an improvement on the 2016/7 application which would have seen an additional 18 AM and 16 PM peak hour trips. The previous proposal was deemed acceptable, therefore the current proposal is also deemed acceptable as it generates fewer development trips. The impact is being considered in the weekday peak periods due to the background traffic that occurs at weekends being lower as well as the office blocks unlikely to be occupied at those times.
- 6.3.10** Grovefield Way and the local network to Arle Court Roundabout are constrained with high traffic flow and queues/delays at peak times. This may make the additional vehicle traffic generated by this development seen significant when assessed or viewed in isolation, however the previous extant permission carries significant weight in planning terms and must be considered when assessing the current proposal. Although each application has to be assessed on their own merits, this site has previously been deemed acceptable for development in planning terms for B1 Office Use. The number of additional trips generated by this current application compared to the extant permission, which can be implemented at any time, is not significant.

Summary

- 6.3.11** Although each application has to be assessed on their own merits, this site has previously been deemed acceptable for B1 office development. Many comments were received from the RRA and other local residents that raised concerns regarding increased traffic congestion that would result from the development. However, the fact remains that even though higher traffic volumes would be created by the development, the number of additional trips generated by this current application compared to the extant permission is considered not to be significant enough to justify refusing the application. This position is also taken by the Highways Agency which has not objected to the application.
- 6.3.12** Cheltenham Borough Council's decision not to contest the highways refusal reason at the upcoming inquiry for the refused application is also a significant material consideration for this proposal. For these reasons, the proposal is considered to be in accordance with the guidance outlined in JCS policy INF1 and section 9 of the NPPF.

6.4 Design and Layout

- 6.4.1** The third refusal reason for the previous application at the site reads as follows:

The proposed layout of the site results in a predominance of hardstanding and retaining structures which result a poor appearance and do not create an attractive streetscape or strong sense of place which responds to the character of this transitional location. The position of buildings including the 'Drive thru' coffee shop and supermarket, close to the edges of the site give the layout a cramped and contrived appearance exacerbated by exterior features such as the 'drive thru' lane and external yards. The proposal is therefore harmful to the surrounding area by reason of its visual impact and also fails to create a high quality business environment in this edge of town location. For these reasons the proposal is considered to be contrary to policy SD 4 of the Joint Core Strategy and CP7 of the Local Plan.

- 6.4.2** It is considered that the substitution of the drive-thru coffee shop for a two-storey office building addresses the above refusal reason to a significant extent. The hardstanding of the drive-thru and any additional signage/paraphernalia that is typically found at a drive-thru is no longer part of the proposal.
- 6.4.3** Locating an office building on this part of the site at the main entrance off Grovefield Way helps to emphasise the fact that this is an employment site. The previous application has the Aldi and the drive-thru coffee shop as the two buildings closest to Grovefield Way, therefore it would not have been immediately obvious that this was an employment site because all of the office buildings would have been situated further into the site away from Grovefield Way.
- 6.4.4** The location of an office building at the main entrance to the site significantly addresses these concerns that were highlighted in the refusal reason in terms of the removing harmful design elements of the drive-thru coffee shop and helping to emphasise the use of the site for employment purposes.
- 6.4.5** The newly proposed office building in place of the drive-thru coffee shop (labelled office 5 on the drawings) would be occupied by Ridge, a multi-disciplinary planning and property consultants. The elevation drawings show the company logo on the north, east and south elevations. The walls of the office 5 building would be constructed in a variety of grey-coloured cladding materials including stone and polyester. The building would appear as a contemporary office building helping to underline that it is part of a wider employment site.
- 6.4.6** It is acknowledged that the Aldi would still occupy a position in the south-east corner of the site near Grovefield Way. It is considered that this position visible from the roadside (although still set back by approximately 25 metres) is justified as a retail unit would benefit from passing trade whereas the offices and nursery do not because they would typically be attended either by employees or customers by appointment only. The Aldi would be viewed in its wider context of a business park and its proposed location would not be inherently detrimental to the overall layout of the development.
- 6.4.7** The revised scheme also includes improved landscaping on the eastern boundary to screen the hardstanding and parking areas that surround Aldi and office 5. The Aldi would be set back approximately 25 metres away from Grovefield Way and whilst it would be closer to North Road West, the landscaping on this southern boundary would be stronger again to help visually screen the development from the houses on this road, supplementing the existing strong hedgerow that already encloses the south-east corner of the site.
- 6.4.8** The proposal includes various other landscaped areas throughout the site with soft landscaping separating the various office units and parking areas. A dense landscape buffer is proposed for the north-west boundary of the site to screen the development from the A40. The Tree Officer has confirmed that the majority of the existing trees on the site are of a low category but some are to be retained as part of the soft landscaping proposal where possible (to be controlled by landscaping conditions).
- 6.4.9** The third refusal reason of the previous application mentions a 'predominance of hardstanding'. Considering the amount of hardstanding that is inevitably required for an employment-led development for infrastructure such as parking and turning areas, this is something that would be difficult to overcome entirely. It is considered that there is sufficient soft landscaping both enclosing the edges of the site and within the site to mitigate concerns about this particular issue.

6.4.10 Office buildings 1 to 4 and the nursery would retain the same size, scale and positioning as the previous application, where there were no perceived issues as they did not feature in the third refusal reason.

6.4.11 The removal of the drive-thru coffee shop in place of an office has been welcomed by many local residents (even if they are still opposed to the development overall). It is considered that the revised proposal has addressed the concerns that were outlined in the third refusal reason of the previous application as the design and layout shows more emphasis on the employment uses. Thus, the proposal is now judged to be in accordance with JCS policy SD4 and existing Local Plan Policy CP7.

6.5 Retail Impact

6.5.1 As the proposed development is located out of Cheltenham's centre, the NPPF requires the applicant to demonstrate that there are no suitable, available and viable sequentially preferable sites that could accommodate the proposed development. This is to ensure that the proposed Aldi store does not have a detrimental impact on the vitality and viability of Cheltenham's town centre and its other local shopping centres. The retail impact of the development was not a reason for refusal for the previous application, but an assessment of this issue has been undertaken nonetheless.

6.5.2 A sequential test has been undertaken and concludes that "whilst allowing for a reasonable degree of flexibility and the requirement for a site to be available immediately, no sites have been identified for the proposed development that are sequentially superior and capable of accommodating the proposed development". The submission identifies that the application site is demonstrably the most appropriate location for the proposed development.

6.5.3 In this instance the applicant is not required to undertake an impact assessment because the proposal is smaller than the default threshold of 2,500 sq.m stipulated in the NPPF and there is no locally set threshold in the existing Local Plan or eCP. However, an impact assessment has been undertaken to assist in the determination of the proposal and consider the impact on the vitality and viability of Cheltenham's town centre.

6.5.4 Cheltenham Borough Council has commissioned an independent assessment of the Retail Impact Assessment. The assessment agrees that subject to the Council's own knowledge of the North Place site and the proposed relocation of the Council offices from the Promenade there are no suitable sites available in sequentially preferred locations and therefore the test is met.

6.5.5 The approved scheme (ref: 12/01612/FUL) at North Place was for:

Erection of a mixed use development comprising; 5,792sqm (gross external floor space) of class A1 food store, 739sqm (gross) of class A1 shops and 19sqm (gross) of class A2 within atrium space and 336sqm (gross) of class A3 (customer restaurant); multi-storey car park providing 634 spaces over 5 floors (300 spaces for public use and 334 spaces for food store customers); 143 no. residential units within a mix of 1, 2, 3, and 4 bedroom houses and flats, (57 units to be affordable) with associated 143 car parking spaces at ground and basement level; creation of new public open spaces; provision of new parking bays for buses and erection of a passenger information kiosk and waiting room; associated other operations to facilitate the mixed use development including alterations to and from the existing highway for vehicular, pedestrian and cycle access. All following the demolition of existing buildings and other built structures on the site.

6.5.6 Officers are aware that this scheme will not be going ahead in its current form and that Morrisons are no longer involved in the site. The application 12/01612/FUL lapsed in

August 2018, as such it seems likely that an alternative proposal will come forward for this site, however it is not clear at this stage what form this will take or what mix of uses it will entail.

- 6.5.7** The applicant is in a position where it is seemingly impossible for them to pass the sequential test because of the lack of information over the intentions for North Place. However, not passing the sequential test is not an adequate reason for refusal in its own right. It is necessary to consider whether the proposal would have any unacceptable retail impacts.
- 6.5.8** The retail impact assessment concludes that the impact on the town centre would not be significant. Caernarvon Road is a district centre in the existing Local Plan which largely comprises the Morrisons store in Up Hatherley that is situated approximately 1.5 miles to the south-east of the application site. Some smaller retail units and a pub are also located at this district centre. The proposal must have regard to the potential impact it would have on this district centre pursuant to Local Plan policy RT7 (criterion b).
- 6.5.9** The retail impact assessment concludes that there is no realistic risk of its closure as a result of the proposals. It also concludes that the trade diversion from Bath Road would be very small. The assessment also concludes that there might be a small amount of trade diversion from Coronation Square however it could not be concluded to be a significant adverse impact. The impact tests are therefore passed.
- 6.5.10** The RRA and other local residents have expressed concerns that the proposal conflicts with criterion (a) of Local Plan Policy RT7 which states out-of-centre retail should only be permitted if a need of additional floor space has been demonstrated. The word 'need' is clarified in Note 3 and it refers to a definition contained within a Ministerial Statement dated 14.02.1999.
- 6.5.11** The introduction of the NPPF in 2012 (later revised in 2018) superseded all preceding Planning Policy Statements, Planning Policy Guidance and Ministerial Statements and the NPPF does not request that a need for retail floor space has to be demonstrated. RT7 (a) is therefore deemed to be out of date due to lack of consistency with the NPPF.
- 6.5.12** Providing it can be demonstrated that out-of-centre retail development does not harm the vitality and viability of existing designated retail areas, e.g. Caernarvon Road, it can be accepted in principle. The fact that the proposed Aldi may compete with other out-of-centre retail units, such as the nearby Asda, is not for the planning system to control, despite objections from the RRA and other local residents. In a free market economy competition and choice for consumers is considered to be healthy and an essential characteristic of a growing economy.
- 6.5.13** The overall conclusion of the retail impact assessment is "that the proposal is in accordance with national and local policy for retail development. In relation to the restaurant development, the proposal would serve a largely local need and the sequential test would be of little assistance in determining the application."
- 6.5.14** Officers have no reason to conclude differently and as such it is considered that in terms of retail impact the development of a supermarket in this location is acceptable in accordance with Local Plan policy RT7 and NPPF section 7. Members did not disagree with this conclusion in determining the previous application.

6.6 Impact on Neighbouring Residents

- 6.6.1** The NPPF states that planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. Local Plan policy CP4 states that development will only be permitted where it should not cause unacceptable harm to the amenity of adjoining land users and the locality.
- 6.6.2** As mentioned above planning permission exists on this site and the impact of the previous proposals upon neighbours will have been fully assessed. However, the mix and distribution of development now proposed is markedly different and has the potential to have more of an impact upon neighbour amenity in terms of the presence of the buildings, their construction, servicing and on-going operation. As such it is important that all these aspects are carefully considered.
- 6.6.3** In terms of the physical presence of the buildings the shortest distances between the proposed buildings and their nearest residential neighbour are as follows:
- Supermarket – 36m
 - Office 5 – 44m
 - Office 1 – 82m
 - Nursery – 88m
 - Office 2 – 103m
- 6.6.4** The positions of offices 3 and 4 are indicative but the nearest property would be located approximately 55m away.
- 6.6.5** The closest relationship is that of the properties of North Road West and the supermarket. However, bearing in mind the distances involved, the fact that the building slopes down towards the boundary and the landscape buffer that it is proposed it is not considered that the physical presence of the building would have a significantly harmful impact on amenity in terms of loss of light, privacy or overbearing impact.
- 6.6.6** With regards to construction, any problems which might arise can be dealt with separate Environmental Health legislation, however a condition is attached requiring a plan for the control of noise, dust and other nuisances which would include limits on the hours of work. The Council currently recommends the following working hours:
- Monday - Friday 7:30AM - 6:00PM
 - Saturdays 8:00AM - 1:00PM
 - Sundays and Bank Holidays - No work producing noise audible beyond the site boundary, unless with prior approval.
- 6.6.7** There is also the potential for deliveries to the supermarket to result in disturbance to the neighbouring properties. The loading bay has been located away from the most sensitive location on the west elevation of the proposed supermarket building. A delivery management plan will be required by condition which will ensure that deliveries take place in a manner that minimises noise and disturbance.
- 6.6.8** The requested opening hours are as follows:
- Supermarket – Monday – Saturday – 08:00 – 22:00; Sunday – 10:00- 18:00
 - Nursery – Monday – Friday 07:00 – 19:00
- 6.6.9** The office hours are not yet known, however given the quiet nature of the use these are not normally controlled through the planning process as they are typically between 07:00 and 19:00. An acoustic report has been carried out which concludes that the impact on neighbours would be acceptable and the Environmental Health Officer does not disagree with its findings or take issue with the proposed opening hours.

6.6.10 Details of a lighting scheme have been submitted with the application which indicate lux levels for the Full element of the proposals. The light spillage is shown to be minimal with a level of 0 at all neighbouring properties with a level of 1 clipping the front gardens of 9 and 10 Grovefield Way. This is well within acceptable levels and should not have an adverse impact upon neighbour amenity. A condition will be required to ensure a similar level of detail is provided for the outline elements of the scheme.

6.6.11 Officers consider the size and scale of development to be similar to the extant planning permission in terms of its relationship with neighbouring properties subject to the proposed conditions mentioned above. Members were seemingly in agreement with this assessment as the impact on neighbouring properties was not a reason for refusal for the previous application.

6.7 Air Pollution

6.7.1 The RRA and many other local residents have expressed concerns that the proposed development would lead to an increase in vehicle traffic to the extent the pollution would begin to impact upon people's health. In particular, there is concern for the proposed nursery being located in an area which such high traffic volumes and the affects this would have on children. The Member of Parliament for Cheltenham Alex Chalk has also written to express his concerns about air pollution.

6.7.2 The last measurements of air quality that were taken in the vicinity of the site were at Telstar Way (approximately 900 metres from the site) in 2013 as shown on the interactive map on the Council's website². This states that annual average nitrogen dioxide (NO₂) levels in the area for 2013 were 34.5 micrograms per cubic metre (µg/m³). The EU Directive referred to in Mr Chalk's letter states that safe levels of NO₂ are defined as an annual average no higher than 40 µg/m³. This threshold is also included in the Council's 2017 Air Quality Annual Status Report.

6.7.3 More recent figures were taken at the Princess Elizabeth Way roundabout in 2016 and the annual average levels of NO₂ for that year were 25.7 µg/m³. The Council's 2017 Air Quality Annual Status Report shows Cheltenham's worst affected areas for air pollution are in the town centre, particularly sites on Gloucester Road, Swindon Road, Bath Road and the highest recording of NO₂ was 48.47 µg/m³ on the Lower High Street.

6.7.4 Officers do not dispute the high traffic volumes that are experienced in the vicinity of the site in and around Grovefield Way and the Arle Court roundabout. The development would increase vehicle journeys to and from the area which would likely see a rise in NO₂ levels. However, there is no evidence available to indicate that the proposed development would raise NO₂ levels to unsafe levels above an annual average of 40 µg/m³ on a regular basis, as experienced in the town centre locations where the urban density is higher than the application site.

6.7.5 Once again, we must also compare the proposed development with the extant planning permission and there is nothing to suggest that the pollution levels would be materially higher for this application. Moreover, Members did not cite air pollution as a reason for refusal in the previous application and there have been no material changes to the scheme that should result in a change to this stance, in fact, the removal of the drive-thru coffee shop represents a modest improvement compared to the previous scheme. For these reasons, the proposal is considered to be in accordance with the guidance outlined in JCS policy SD14.

² https://www.cheltenham.gov.uk/info/66/environmental_protection_and_pollution/288/air_quality_and_pollution/2

6.8 Flooding and Drainage

- 6.8.1 JCS policy INF2 and NPPF section 14 state that development proposals must avoid areas at risk of flooding, in accordance with a risk-based sequential approach. Proposals must not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment either on the site or elsewhere.
- 6.8.2 The site is located within a Flood Zone 1 area as identified by the Environment Agency, which is the lowest risk category for flooding (Flood Zone 3 is the highest risk category).
- 6.8.3 The planning application was accompanied by a Flood Risk Assessment (FRA) and surface water drainage strategy. The surface water drainage strategy for the full elements of the proposal incorporates the balancing pond approved and constructed for the BMW development. Surface water runoff from roofs and impermeable areas will be managed via a combination of permeable paving and cellular storage with a controlled discharge through a balancing pond at the pre-development greenfield runoff rate.
- 6.8.4 Detailed comments have been provided by the Local Lead Flood Authority (LLFA). They have confirmed that the proposed discharge of 8.4 l/s, which will combine with the 1.8 l/s entering the balance pond from BMW is acceptable. Discharge is to the unnamed watercourse at the northern boundary of the site.
- 6.8.5 The proposed permeable paving will accommodate surface water for storage only. The remaining storage requirement will be held in geocellular crates with the final amount to be determined in the detailed design stage.
- 6.8.6 The outline element of the proposal is subject to a strategy of discharging surface water at the pre-development greenfield rate. Again further information would be required by condition.
- 6.8.7 It is normal with large scale proposals for the detailed design of drainage strategies to be submitted via conditions when the technical construction designs are prepared. However it is necessary to set out a strategy which confirms that the proposal is capable of adequately handling surface water runoff. In this instance the LLFA have confirmed that this is the case.
- 6.8.8 As such it is considered that the scheme is compliant with the technical requirements and as such is acceptable in terms of flooding and drainage.

6.9 Ecology

- 6.9.1 JCS policy SD9 relate to ecology and states that The biodiversity and geological resource of the JCS area will be protected and enhanced in order to establish and reinforce ecological networks that are resilient to current and future pressures. The NPPF section 15 states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats unless the need for, and benefits of the development in that location clearly outweigh the loss.
- 6.9.2 The proposal was accompanied by an ecological assessment. The site was originally surveyed in 2006 and updated surveys were carried out in 2011, 2013 and 2016. Specific bat and badger surveys were also carried out. The report concludes that there are no overriding constraints to development. However it is proper to provide habitat opportunities and as such bat and bird boxes will be secured through the development and required by condition. Native planting will also be used within the landscaping scheme to provide enhancement in these areas.

6.9.3 Natural England was consulted for this application and they have raised no objections. Thus, the proposal is considered to be in accordance with the guidance outlined in JCS policy SD9 and the NPPF.

6.10 Green Belt

6.10.1 Policy SD5 of the JCS echoes the general aims of the NPPF. However the adoption of the JCS changed the boundary of the Green Belt in the location of the proposed development in order to remove the parcel of land (including the BMW site) at Grovefield Way. The supporting text states “a small change has been made to the Green Belt boundary in the area of the Reddings to provide a more appropriate boundary after an implemented permission at Grovefield Way”.

6.10.2 In her report the Inspector states: Two other relatively small areas are proposed for GB release, which are not identified within the Plan. One is located at Grovefield Way in the area of The Reddings where development is being built out. The other is in the area of the Old Gloucester Road and Arle Nurseries, which would provide a more appropriate GB boundary to the north of the West Cheltenham allocation and to the south of the North West Cheltenham allocation. Exceptional circumstances exist for both of these releases.

6.10.3 Local residents have raised the issue of the proposal being inappropriate development in the Green Belt. However, in light of the above, these concerns are no longer applicable because the site is now outside of the Green Belt.

7. CONCLUSION AND RECOMMENDATION

- 7.1** The proposed development has attracted a high level of objection from local residents and the Reddings Residents' Association who have set out their concerns in detail.
- 7.2** However a decision must be made on planning merits bearing in mind the relevant policies as set out above and the demonstrable fall-back position of the applicant in terms of the extant outline planning permission for B1 development at the site.
- 7.3** Members voted to refuse the previous application, which was similar in character and scale to this application, for three reasons. This report has found that this application features revisions that address the three refusal reasons.
- 7.4** When this is taken in consideration in conjunction with other factors such as the site's allocation for employment development in the emerging Cheltenham Plan and the extant permission for B1 development at the site, the argument in favour of permitting the development is considered to be sound, notwithstanding concerns raised by local residents.
- 7.5** The proposed development has been found by Officers to be acceptable when assessed all the relevant local and national planning policies. Thus, the recommendation is to permit the application, subject to conditions and the signing of a Section 106 agreement.

8. CONDITIONS

To follow in an update prior to the planning committee meeting.

APPLICATION NO: 18/01004/FUL		OFFICER: Mr Joe Seymour	
DATE REGISTERED: 23rd May 2018		DATE OF EXPIRY : 22nd August 2018	
WARD: Benhall/The Reddings		PARISH:	
APPLICANT:	Hinton Properties (Grovefield Way) Ltd		
LOCATION:	Land At North Road West And Grovefield Way, Cheltenham		
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).		

REPRESENTATIONS

Number of contributors	175
Number of objections	171
Number of representations	2
Number of supporting	0

Office Of Alex Chalk MP

Comments: 4th June 2018

Thank you for notification of the hybrid application for development of land at North Road West and Grovefield Way. Alex Chalk MP would be grateful if his concerns/comments about the previous application could be carried forward to this application. The new proposals do not appear to show significant alteration to those previously submitted.

In addition he would draw attention to the air quality control issues associated with this development. Since the original application, Cheltenham has been identified as one of just 33 towns and cities required by the High Court and Government to assess what measures they could take to tackle illegal and harmful levels of air pollution as soon as possible. According to the ruling, Cheltenham is required to undertake Feasibility Studies no later than 31 July 2018, after which the government must approve a final Supplement to the Air Quality Plan setting out the measures identified by the Feasibility Studies no later than 5 October 2018.

In producing its plan to tackle illegal levels of air pollution, there are three legal tests which CBC must meet in order to comply with the EU Ambient Air Directive (the Directive) which sets limits for levels of nitrogen dioxide (NO2).

The legal tests require that local authorities' plans must:

1. Aim to achieve compliance as soon as possible
2. Choose a route to compliance which reduces human exposure as quickly as possible
3. Ensure that compliance with the limit values is not just possible but likely

The proposed development and associated documentation does not appear to properly address these issues.

Comments: 21st September 2018

Following your letter notifying us of the revised plans for the site on Grovefield Way, I can confirm that Alex's previous comments on this application still stand and that he would like these to be considered once again against the revised plans.

4 The Grange
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 14th June 2018

Inappropriate Position

This site (Grovefield Way) is not an appropriate site for a retail development. It is not 'out of town' it is adjacent to domestic properties which will be significantly impacted on by retail activity. Unlike a B1 office, which the site has previously been granted permission, a retail site will undoubtedly have 24/7 traffic and noise, due to out of hours deliveries and people visiting. This application suggests that having people sitting drinking coffee outside up to 11pm will be a good thing for the community, that is unless you live in it and are trying to enjoy peace and quiet in your own home and garden.

Allowing this proposal will create a huge area of urban sprawl around an already unsightly BMW building that has breached its own planning conditions. It is inappropriate to the immediate area and is damaging to the appearance of the approach to Cheltenham town. Please learn from your mistakes and make good the damage which has already been done by allowing BMW to build such an eyesore on the approach into the town.

Need for this Development

With a large number of retail outlets in town closing and with a large supermarket (Asda) literally just around the corner, building another supermarket is completely unnecessary. It will only take business from existing outlets and is likely to cost local jobs rather than provide them. It may well move jobs from the Tewkesbury Road side of town to this side of town - adding to the traffic and parking issues that have appeared since the building of BMW.

This proposal would not make any contribution to the economic prosperity of our town. There is no evidence that this type of development is actually wanted or needed by local or Cheltenham residents generally, who's feelings have been repeatedly ignored - in fact, looking at the reaction of the contributors to this planning application, it is clear that it is neither wanted nor needed.

Flooding

Cheltenham Borough Council has failed to address the issues caused by the same developer's failure to provide adequate site drainage on their BMW site. Flooding is now a significant issue locally and there is no indication that the new development does anything other than exacerbate that. At The Reddings Residents Association AGM a local resident spoke very forcefully about the detrimental impact that development on this site is already having on his land and this additional development will seriously add to that issue.

Hours of Business

There do not appear to be any restrictions imposed on hours of business or the hours of delivery to retail units. Asda has been permitted to deliver 24/7 and now regularly wakes up its residential neighbours in the early hours of the morning. Aldi, Costa Coffee etc will do the same if you permit

it. This will significantly impact the health and quality of life of The Reddings Residents and will be in breach of the Borough Council's own promise in the Cheltenham Charter that we can expect to enjoy a healthy life, having positive relationships at home and with the wider community and enjoy the benefits of a sustainable built and natural environment.

Greenbelt

The National Planning Policy Framework, is explicit in stating that Green Belt boundaries should only be altered in exceptional circumstances. This proposal is not an exceptional circumstance with absolutely no evidence of a need for a further supermarket, coffee shop or nursery so the boundary should never have been moved.

Traffic

The inevitable increase in traffic noise and air pollution that would result if this type of retail development were allowed would be intolerable to those of us living locally. We wouldn't just be looking at early morning/early evening increased but 24/7 increases. This would have a major impact on people living in the surrounding area who have made the choice to live in a semi-rural location for a reason. They like the peace and quiet and their rights should be seriously considered.

Litter

Residents already have to clear up huge amounts of rubbish thrown out of cars ruining the appearance of residential roads and the surrounding area and impacting on the wildlife already struggling in the area. Adding another Coffee Shop will no doubt add to this

Wildlife

The impact of overnight security lighting on local wildlife will impact the numbers of nocturnal species in the area including moths, bats and owls. The removal of any hedging and trees is not acceptable - they provide an established wildlife habitat corridor. We have already lost too much of it during the development of BMW. None has been replaced, leaving a complete eyesore for all those of us living in the vicinity.

Please refer to the wildlife report submitted by one of The Reddings Residents showing that at least 461 individual species rely on the habitat in this grid reference for their survival. The Formal Landscaping now present at BMW is stripping our countryside of meaningful habitat. It is resulting in a desert environment for wildlife that is already struggling. The further removal the last remaining existing hedgerows and important endangered Perry pear trees will be an act of major destruction that can never be replaced.

Light and Noise Pollution

The loss of the greenery surrounding BMW has already changed the appearance and character of this area and has resulted in an increase of noise pollution. Grovefield Way had been carefully planted with trees and hedging to screen residents from the noise of the road, so how come BMW have been allowed to remove it and not replace it with similar planting? This has still not been seen to have been addressed by the developers. Take a look at B&Q opposite. They have at least attempted to shield the development from the road and residents. They need to look at doing the same on the BMW side of the road.

The extra 24/7 security lighting required by this type of development will impact on local residents. This is a semi rural location chosen by local residents for that reason and will negatively impact our lives. No consideration or respect has been shown to those living locally, in these revised plans. We have no street lighting in our part of The Reddings so to add 24/7 lighting at the power required will have a really negative impact on our lives.

Conclusion

This is not just a case of NIMBYism, but a genuine concern for the inappropriate nature of this development.

I hope that the Council will see sense, listen to local residents and reject the current revised application. Please draw a line in the sand and say 'no more'.

I plead with the council to think of the surrounding residents whose quality of life has already been negatively impacted when considering these plans.

This plan is largely unchanged from its predecessor which was quite rightly turned down. The developer has made no attempt to address the concerns of the community about this proposal, or their current BMW site. The Council cannot, in good conscience, say that there is any substantial change that warrants this application being passed. It must reject the application and instead should show respect and care to the people who live in the borough.

Comments: 6th October 2018

1. I welcome the removal of the retail element of Costa and replacing it with B1 offices. However, the "indicative" statement gives no form of commitment, and a variation application could easily be made to convert the unit back to a coffee shop once permission for the remainder of the site has been granted if an "A-class" element is introduced. Precedents for this behaviour were set with the BMW project and we would be naive to believe that history would not repeat itself.
2. The extra planting of native species is also welcomed but cannot be trusted. At BMW the planting has all died and has not been replaced leaving the building clearly visible from the road. The planting that was there, before being destroyed by the clearance, was an extra barrier against noise pollution for neighbouring housing and was important habitat for wildlife. Any extra development should include extra planting along Grovefield Way, the Golden Valley, A40 and North Road West and within the development to mitigate the loss of habitat and the lack of a noise barrier. Planters are not adequate. They will be cosmetic and are not wildlife friendly and will not be long lived as can be seen in the Waitrose car park planters which have suffered due to neglect.
3. The scale proposed for Aldi remains unacceptable. The amount of space for parking is inadequate, there is no need for an Aldi here as one already exists a mere 10 minutes drive away. We have Asda and Morrisons literally on its door step. The road system outside the complex is inadequate to cope with the extra retail traffic that will be brought into the area throughout the day. It is also worth noting that according to the financial forecasts within the documents much of the Aldi trade will rely upon displacement from Asda and Morrisons and the net employment gain from this element of the proposal is likely to be very few, if any, low paid jobs.
4. We also do not believe that the site is suitable for a childcare facility with all of the fumes and pollution that will be generated by the development, particularly the retail element, as well as fumes from the enlarged Park and Ride, Grovefield Way and the A40.
5. From analysis of the proposals it is apparent that there is a shortfall in the number of parking spaces being provided. Further research of similar shared sites around the country shows that allocation of parking between staff and public will be an ongoing issue, as well as conflicts with service vehicles. Parking in surrounding roads is already a problem with BMW staff parking on grass verges on North Road West churning up the verges, ruining the look of the area and creating parking hazards down the road.

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6. There will be increased traffic trying to turn right out of the development onto an already busy road causing further congestion throughout the day. Also, there is inadequate turning right refuge space from Grovefield Way into the site which will cause dangerous hold ups on a bend in the road, leading to an increase in potential for accidents and congestion on an already chaotic roundabout.
7. Deliveries to the retail site will be early morning and late at night which will impact on the noise levels of neighbouring housing. Reversing noise will be heard several miles away and would be unacceptable especially during summer months when windows are open, disturbing the sleep, quality of life and mental health of people living nearby.
8. The planning committee should stick to the original permission of an office development with sound wildlife consideration.
9. Areas of the proposal are simply not detailed enough, or appear fanciful because it cannot be achieved e.g. re-profiling a 2.5m deep embankment to the boundary of North Road West without destroying the hedge, or getting storm and foul water to flow uphill / not cause local flooding. Also, not causing further disruption to ground water flows as has occurred following BMW, resulting in significant damage to the newly re-surfaced North Road West. A viable and enforceable traffic plan is also required (to minimise on street parking in the surrounding area).

I urge the committee to see sense and refuse the retail aspect of this development and ensure that the former Green Belt status of this site is respected in what ever replaces it.

TPS Transport Consultants Ltd
Stonebridge Court
151 - 153 Wakefield Road
Horbury
Wakefield
WF4 5HQ

Comments: 19th June 2018
Report attached.

89 Redgrove Park
Hatherley Lane
Cheltenham
GL51 6QZ

Comments: 13th June 2018

The traffic congestion and pollution on the Reddings Road and on Hatherley Lane leading on to the Golden Valley Roundabout, is excessive already and not supported by the infrastructure

We already have a supermarket in the vicinity, Asda, which is well supported, we do not need another.

We don't need extra offices for rental. There are offices nearby at the Manor by the Lake and most of these appear to fail to sustain continuous rental.

As for a coffee or fast food outlet, we already have KFC within a very short distance.

This would destroy greenbelt land for no apparent reason. At least it could be used to better effect for residential buildings.

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I therefore submit my objections to the proposed application and ask that the council would once again refuse the developers this permission. I am a resident of Redgrove Park and this would certainly affect my quality of life and the life of my neighbours in the Reddings and the surrounding areas.

Woodbines Cottage
Sunnyfield Lane
Cheltenham
Gloucestershire
GL51 6JB

Comments: 14th June 2018

Creating a mini-retail park as this application if permitted would do is inappropriate in the greenbelt. It's out of keeping with the Inspector who indicated it was only suitable for Offices (category B1) and also it flies in the face of both the recently agreed JCS and the Cheltenham local plan.

Also from the point-of-view of Up Hatherley residents we already have grave concerns about the traffic flow along our Distributor Road and around the Arle Court roundabout where traffic is already at a standstill for much of an ever expanding rush 'hour' . This development would add substantially to this problem and apparently offers no potential mitigation of these problems. It will therefore force traffic back on to the very roads within our Parish that the Distributor Road was designed to remove as these roads were (and indeed are) not suitable for this purpose.

28 Barley Close
Cheltenham
Gloucestershire
GL51 0QP

Comments: 14th June 2018

We do not need another supermarket/bargain shop in that area or any building try turning it into a nice park with a little bit of wild flowers for people to enjoy keeping green space if we keep building there won't be any green space for wildlife to live, for us to see and for children to learn about nature

12A Redgrove Park
Cheltenham
Gloucestershire
GL51 6QY

Comments: 9th October 2018

Please do not allow another low quality development on this prime site. Since moving to the area 17 years ago I have seen rubbish from KFC all round the streets, been held up on my journeys by traffic to and from B and Q and my local pub is now a Harvester. I am not a snob but Hatherley and the Redding's used to be such a lovely quiet neighbourhood and, in many ways, it still is. I love living in this area but I am becoming increasingly disillusioned with my council who do not seem to be matching the calibre of development to the local area. All summer we have endured the sound of building works for the massive retirement village being built in the woods behind our properties. A project which has seen the devastation of natural habitats. While I see the merits of office space and a nursery, I find the idea of an Aldi on my doorstep particularly abhorrent. Please stop this before our lovely estates are ruined forever.

6 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 12th June 2018

Reiterating all the comments made already. This application does not adequately consider the following key items:

- 1) Traffic and transport assessment. No modifications to the highway outside of the development boundary are proposed. This stretch of highway is already in need of development. This proposed development will only make things worse (congestion, confusing highway junction arrangements increasing the risk of incidents etc).
- 2) Linked to the traffic and transport - air quality and noise assessment is inadequate given the close proximity of residential areas. The opening hours of the Aldi will increase noise levels later into the day. Due to the slower speeds and congestion that will now occur the air quality will suffer as a result. With residential areas so close this will not be good for the health of residents, including our younger generation.
- 3) Local need - Is there a need for another supermarket given the very close proximity of existing supermarkets (Asda, Morrisons, Pets and Home, Home Bargains etc).
- 4) Should a drive through coffee shop really be proposed here? Surely this encourages drivers to drink coffee whilst driving? As a drive through is proposed I assume this is to encourage drivers to divert from the main road to pick up a coffee and drink it while driving to work - dangerous and illegal. It should be a 'normal' coffee shop - encouraging local residents to pop in for a coffee.
- 5) Parking - the BMW garage already suffers with inadequate amount of parking. Resulting in cars using the nearby residential streets for parking. In fact there is already a car that parks on the verge just outside the BMW garage on a daily basis. There is clearly not enough parking proposed and this will only encourage more inappropriate parking in people's streets.
- 6) Ecology and Environmental impact assessment. Inadequate assessment for this kind of development. I do not see any sustainable measures proposed either - rainwater harvesting, solar panels, compensation planting, SuDS etc.
- 7) Lighting assessment - this development will adversely affect nearby residents. The lighting design needs much more development.

12 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 12th June 2018

Comment submitted date: Thu 14 Sep 2017

I wish that my objections made previously to this attempt to defile green belt are carried forward. The latest submission by the developer is nothing but a confidence trick.

Comment submitted date: Tue 10 Jan 2017

I fully support the many valid objections raised by fellow residents such as disregard for the sanctity of Greenbelt, the attempt to include A1 as well as B1, the predictable further rise in traffic

congestion and the exacerbation of the current on-road parking problems. These objections clearly demonstrate the underlying fear that this predominately residential area is to be further blighted by proposals that would appear to be intent on ignoring the mistakes of recent years and the opinion of residents.

The decision to allow the KFC "drive-thru" has resulted in an appalling amount of litter and food waste being regularly deposited in the local area. How utterly galling then to read (from the Retail and Planning Statement, para 3.4) of the totally unsubstantiated assertion that there is a "consumer... need" for a Costa "drive -thru" in this area. Even worse is the trumpeting, at para 3.2, of the proposed "visual prominence" to be awarded to such a facility. I object to this facility on the grounds that there is no requirement for it and it would further increase the litter problem that we already suffer.

The site, even for office space alone, demands proper landscaping and screening by substantial tree planting to ensure the site does not further damage the nature of this residential part of Cheltenham. Any retail development should be out of sight at the western most fringe of the site with a new access road to the A40 to avoid further traffic problems. I object to the visual impact the proposal would have, to the inadequate provision of tree cover and the lack of necessary, additional road capacity.

Equally preposterous is the similar, again unsubstantiated, assertion that there is "consumer ...need" for an ALDI supermarket in the Hatherley area which surely must be the best-served area for supermarkets in the town with ASDA and MORRISONS on our doorstep and ALDI and SAINSBURYS less than 3 miles away, as are both WAITROSE and TESCO. I object to this proposal on the grounds that there is no requirement for it, the proposal being merely a ploy to witness a further shift from B1 to A1 by the back door.

The experience gained from the development of and around ASDA must no longer be ignored. The promises, as I recall them, included adequate parking for staff and no impact to traffic flow on Hatherley Lane. The use of the Lane as a car park throughout the day demonstrates that notions of staff walking, cycling or car sharing are pie in the sky; the parking problems in Benhall caused by cars belonging to GCHQ staff and contractors further illustrate the emptiness of such promises. I object to the Transport Statement (with its naïve implication at para 2.29 that the walking, cycling and the use of public transport by staff, visitors and customers will reduce reliance on cars) on the grounds that the provision of car parking spaces is inadequate and would therefore further add to the on-road car parking problems already being endured.

Finally, like many others, I deplore the apparently underhand attempt to catch residents off-guard by the timing of the exercise around the Christmas break.

June 2018.

I believe I am right in saying that:

- (a) there is pressure on the capacity of the local Park and Ride (PnR) facility.
- (b) Land originally earmarked for expansion of the PnR is now part of the BMW site.
- (c) BMW "rent" some 80 spaces within the PnR for use of their staff having, presumably, been allowed to proceed with their development without making adequate provision for staff parking.
- (d) Schemes are now being considered that would ensure that the PnR is used solely for its original purpose, i.e. parking for those who then make the onward journey to Cheltenham town centre.

Should BMW lose its spaces within the PnR as a consequence of step (d) then further exacerbation of the on-street parking problem would result.

This smacks of some fundamental, and disturbing, flaw in the planning process. I suggest that the Inspector should address this as a priority before any further planning applications are considered in this area.

Comments: 8th October 2018

The Introduction to the Design and Access Statement Addendum boasts of a

"... design solution that contributes positively to the surrounding area ...".

What is being offered?

First, is the ALDI supermarket. The assertion in previous submissions that there was a "consumerneed" (an assertion that was unsubstantiated and objected to by residents) has now been replaced by "convenient and accessible facilities required day to day by people working in the adjacent offices". Clearly, there is no case for a supermarket to serve only, at most, 428 FTEs in the 3 office buildings of the non-outline application and since such facilities already exist at ASDA anyway, the case for an ALDI is, again, bogus. I conclude that this yet another blatant attempt to create a retail precedent within an area designated for B1 use.

Second, is the nursery. The concern over traffic pollution near busy main roads has been amply reported and in particular, in relation to facilities for children. What sense then in proposing a nursery in this location?

My objection to the proposal is that it does not meet its stated aim of a positive contribution to the surrounding area.

28 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SF

Comments: 14th June 2018

We agree with all the objections made, there will be no greenbelts left and the wildlife will suffer. We truly hope this application will be rejected.

Lynwood
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 12th June 2018

I am very concerned about this application and have the following points in objection to it.

This land was originally Green Belt, and woefully the council have allowed to be developed. I wish very much that this had not happened, but as it has been, it is vital that any development should be sympathetic to the local environment.

The application is significantly 'over-developing' the site. I agree with other comments that there is no need for another supermarket and a drive through facility - we've got them already. The council should be encouraging retail to use the town centre and the new developments that are happening there. This type of facility would increase traffic, noise and light pollution to unacceptable levels.

Regarding the office buildings and childcare, this too will cause additional traffic on Grovefield Way which is already terribly congested at peak times. So much traffic now uses this road to gain access to the A40 that the access to Arle Court roundabout really needs adjusting. Possibly traffic light controls should be installed for this entry (at present the traffic lights are only on the A40

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itself) or some way of creating a flow lane so that traffic can get directly onto the A40 and to the motorway. Maybe it would be practical to have access to the site directly via the A40.

The parking suggested for the development does not seem enough. Although there are bus routes along the A40, this is only going to help people to get to work if they can easily get to a bus stop at the other end. Otherwise they will come by car, and if they can't park on-site, they will park on surrounding roads. This is amply evidenced by the parking around GCHQ, which doesn't have enough parking for their staff. The park & ride facility is now completely full by around 10am. So more parking would have to be allowed for. This will create further congestion on surrounding roads and loss of amenity for the residents.

It's dreadful to see the high building of the BMW development from our house where once we saw rural landscape. This has changed the rural aspect of the area and any further development will make it worse.

The noise from the A40 has significantly increased since the trees were 'thinned' along the side of the A40. Some visual and audio screening is vital, both to baffle the noise of the A40 and to screen the development itself. The A40 should be laid with surfacing that minimises vehicle noise.

I'm concerned that more hedgerow would be removed - hedgerow supports our wildlife and is shrinking at an alarming rate. The BMW development has already removed far more hedgerow than the plans seemed to show. We need to protect hedgerow and the associated wildlife. There has been frequent incidences of flooding since the erection of BMW. Any further development will only make this worse.

Thank you for reading these comments, and I hope you will take these into consideration.

Comments: 2nd October 2018

Once again planners are trying to get an almost identical proposal through as one that was rejected previously. We do not need an Aldi. We have Asda and Morrison both adequately serving the local community within 2 miles of this site. We do not need a Costa coffee facility. Morrison have a cafe and there is a pub close to the proposed site that can fulfil that need. We already have a day nursery at the community centre and do not require another one. The local infrastructure cannot cope with anymore traffic. The roads around this site are already gridlocked at peak times. What we need is more open space, more green areas and less development. I strongly oppose this development which offers no benefits for local people and only seeks to line the pockets of developers.

6 Rissington Close
Cheltenham
Gloucestershire
GL51 6LW

Comments: 25th May 2018

The area could be put to better use providing car parking available to ALL local workers including GCHQ who will need them when the cyber hub is open. Actually they desperately need parking now as many local residents are inconvenienced by their "contractors" parking on local roads.

The park and ride is also currently abused as there is nowhere else to park. The proposed businesses will only provide enough spaces for THEIR workers.

Lets have a low level multi storey car park for all with reasonable day parking charges this will very soon make a good return on the investment.

7 Shakespeare Cottages
North Road West
The Reddings
Cheltenham
GL51 6RF

Comments: 12th June 2018
Letter attached.

10 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 13th June 2018

The Traffic jams at both ends of the working day on Grovefield Way are already causing lots of pollution and loss of time for those that are unfortunately caught in the delays. Any additional traffic will lead to the total loss of reasonable accessibility to the park and ride during the so called rush hours. We already have 2 suitable supermarkets close by, I do not see the need for another.

If any development is to be considered on this site it should be for additional spaces for the Park and Ride, as a large number of the current spaces have been "leased" and are not available to the general public. This could be reasonably green, not all tarmac if developed like the National Trusts has for some of it's car parks.

Coffee is already available nearby, so I believe that the Costa would only add to the traffic and litter.

Comments: 8th October 2018

I believe that I have previously objected to this development and there have been no changes to the proposal that would address my concerns. To recap, the surrounding roads are already under stress that results in long delays and high pollution. This development will only add to that and extend the periods of time when there is a traffic problem. There is no need for an extra supermarket, this area is currently well served by Asda and Morrisons. Additional spaces are really needed at the park and ride as there are many that are "rented out" and as such not available to people who wish to "park and ride".

16 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 18th June 2018

Do we really need more coffee shops and supermarkets in this area? I THINK NOT!

When I moved to this area almost 18 years ago, Hatherley Lane was just that, a lane. The only new building in the area was the Nuffield Hospital. Since then I have witnessed B&Q, Harvester, Travel Lodge, Home Bargains, Pets at Home and most recently Asda (the last of which, I had no opportunity to object to for some reason, it just appeared) not to mention the gargantuan BMW garage arrive!

I feel Hatherley Lane, if this development goes ahead, should be renamed, 'Hatherley Racetrack' as it no longer can possibly be called. 'Lane'. This development will only serve to increase traffic here and in the surrounding area. The volume of traffic has already increased beyond

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recognition, causing a rise in air and noise pollution. Some drivers don't even acknowledge it's a residential area, driving like maniacs!

If I dare to leave my bedroom window open during a hot summers night (or day)I can hear the rumble of cars through the night. Often I have to make a choice, stay hot or put up with the noise! This can only become worse if you allow further developments here.

The effect of the increasing devopments in this part of Cheltenham has had a devastating effect on our local wildlife. I used to see badgers,foxes, hedgehogs, nuthatches, collared doves, lapwings, woodpeckers (green and common) bullfinches, green finches and many, many more visit our garden, but in recent times I've noticed a huge decline, basically, they've all disappeared. Now the only visitors we get to our garden now are wood pigeons, pigeons, crows, magpies, a few blackbirds and the odd robin.

I have always enjoyed supporting and observing the wildlife that come to my garden, this I why I can honestly say it these developments have had a real and negative impact.

So, for all the reasons I have listed above I **STRONGLY OBJECT** to any further and **UNNECESSARY** developments proposed to this area.

Tamarisk
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RA

Comments: 18th June 2018

I wish to object to the planning application relating to land at Grovefield Way. The location does not have the infrastructure to cope with the existing development let alone more- flooding and parking problems are of major concern, particularly when there is undeveloped brownfield sites nearby (behind Nuffield hospital). System would not allow me to log my objection due to server failure.

Balquhidder
The Reddings
Cheltenham
GL51 6RY

Comments: 18th June 2018

Letter attached.

11 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 21st September 2018

I still strongly object to the plans for development of this site, changing the Costa to an office is not really solving the problems that have already been given in past objections.

Cherry Court
2 Leyson Road
The Reddings Cheltenham
Gloucestershire
GL51 6RU

Comments: 11th June 2018

The B&Q roundabout has a lot of queuing traffic during peak hours in the morning and evening. This is caused by the two new housing estates approved few years back. Adding a supermarket and Costa will make the situation worse.

We definitely don't require another supermarket within 1 mile of each other.

It is a beautiful open space that we have been enjoying while walking past. Don't like commercialisation of this part of Cheltenham.

Comments: 18th September 2018

I wish to register my strongest objection to the second application to build a hybrid business park on the Grovefield Way "BMW" site.

I live nearby and use the roads around this site for walking/cycling and have been enjoying the open space.

I find it astonishing that the developers have made a further application which has been accepted by CBC, after the original one was firmly rejected by the Council in December 2017.

Here are my reasons for objecting:

Traffic - Already Arle Court roundabout and Grovefield Way are subject to considerable congestion and I do not believe that the road system will cope with the additional traffic generated, particularly from the retail element.

Aldi - I do not see how you can justify a new supermarket when there are already two major supermarkets within a 5 minute drive of the site. There is only so much business potential within an area and unless trade is attracted from outside the vicinity (leading to more congestion) this will only mean job losses or restructuring within Asda and Morrisons.

Happy Days nursery - This will add to the traffic problem as parents have to drive-in/out to drop/pick the children.

Offices - If there is a demand why are there empty offices in Cheltenham?

The Seekers
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RD

Comments: 8th October 2018

I live in North Road East not far from this proposed Aldi.

I use Aldi it is a very good Supermarket it's practically a stones throw away from where I live now and that goes for everyone who lives in this area so it just duplication and of course we have Asda right on our doorstep.

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Why not build a new school to replace the school down Robert Burns Avenue.

I am sure residents who live in Robert Burns Avenue would be pleased and relieved to see the school go and be replaced with a nice Park.

The new school would have adequate parking to enable children to be dropped off and picked up safely.

Not everything is about making money, let the people have peace of mind and contentment.

Peace and harmony for residents is what life is all about not controversy, stress and anxiety and that is hopefully that is what our MP will do for us.

Carobs
The Reddings
Cheltenham
GL51 6RL

Comments: 11th June 2018

All our original objections still stand and we wish to point out that recently planning consent has been given for yet another supermarket and coffee shop on the old BMW site in Tewkesbury Road and a similar development at Hucclecote. This area of the town is more than adequately served with Morrison and Asda. Yet again the planners seem determined to develop regardless of the detriment to the locality. We understand that this maybe referred to the Planning committee but recent experience with decisions made by the planning committee have been totally ignored.

We object to the proposed planning application on the following grounds:

- 1) we are already well served with supermarkets and Asda is only metres away from this proposal. Also current thinking is for local express shops and not large supermarkets
- 2) more office space was to be built by the side of Asda but this is now to be housing which is totally inappropriate next to the supermarket loading bays and the resultant noise. Offices would be more appropriate and therefore more offices would not be needed on the BMW site. There is office space available in Cheltenham which is still vacant
- 3) coffee shops abound and are in nearly every store. Again there is coffee available at Asda, Harvester, KFC and Jury's Inn
- 4) We are not in a position to comment on nursery provision but note that some nurseries have vacancies at present. The siting of a nursery so near to a busy main road is irresponsible considering the noise and air pollution from traffic

Comments: 3rd October 2018

We have objected to previous development on this site and all our former objections still stand. We agree with all the points made by other contributors and feel to restate them is tantamount to reinventing the wheel. The exclusion of Costa Coffee is a minor change and although welcome, will no doubt be reinstated at a later date if planning permission is granted. We vehemently oppose any further planning on this site and urge you to reject this application permanently.

49 Glynbridge Gardens
Cheltenham
Gloucestershire
GL51 0BZ

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Comments: 14th June 2018

I am sending this email to you as I have been unable to register my objection on the Cheltenham Borough Council public access website.

Although I moved from The Reddings one year ago, I was very disturbed to hear that the developer had placed a further application for a hybrid retail park on the Grovefield " BMW site, despite being firmly rejected by the Council in December 2017.

While I cannot see any logical reason for a new Aldi store to be built when the surrounding area is already more than adequately serviced by the existing supermarkets. I am very concerned about the possibility of a new nursery being built on the site.

As it is anticipated that the first phase of building will only take into account the Aldi, Costa Coffee "Drive Thru" and nursery and not the permanent offices, I feel this will challenge the very existence of the excellent Foxcubs Nursery and The Reddings Community Centre Playgroup.

I have been extremely happy with the Foxcubs Nursery and this is the reason why I use it every day for my daughter, rather than choosing a more local nursery nearer my home. I know the proprietor has put in considerable effort over the last 19 years to build its superb reputation.

I would also query the wisdom of placing a new nursery in the middle of an area that is bordered by the very busy A40 Golden Valley and the now gridlocked Grovefield Way. Despite the optimistic traffic surveys I cannot see how the congestion will not increase substantially if the development proceeds.

This will expose vulnerable pre school children to noxious vehicle exhaust fumes, made worse by stationary traffic. I speak not only as mother, but as a tutor of severely mentally and physically handicapped students, including those with profound multiple learning difficulties.

No child's health should be compromised at all, but to endanger health through a development that is neither needed nor wanted is negligent. An accurate assessment of pollution is urgently needed before any building takes place.

Furthermore, the creation of a Drive Thru Costa Coffee that will be open until 11.00 pm will compromise the quality of life of the residents opposite through increased noise and light pollution. Litter thrown out of car windows is already an issue with KFC. Finally, I have been concerned about the amount of parked cars that have appeared on the roads since BMW was opened.

This has resulted in The Reddings Road becoming a slalom in the rush hour periods. If inadequate parking is provided in the new development this will lead to further inconsiderate (and possibly illegal) parking in the area resulting in a rapid decline in road safety.

I would urge all councillors and planners involved in this application to carefully consider all the views expressed by the local residents. As we have seen with BMW, once it is built it cannot be undone.

Many thanks for your time.

Saint Margaret's
Saint Marys Way
Stroud
GL6 8SW

Comments: 4th July 2018

I wish to register my strongest objection to the second application to build a hybrid business park on the Grovefield Way "BMW" site.

Although I do not live near the site, I regularly visit the area to see my parents who live nearby.

I find it astonishing that the developers have made a further application, after the original one was firmly rejected by the Council in December 2017.

Here are my reasons for objecting:

Traffic - Already Arle Court roundabout and Grovefield Way are subject to considerable congestion and I do not believe that the road system will cope with the additional traffic generated, particularly from the retail element.

Aldi - I do not see how you can justify a new supermarket when there are already two major supermarkets within a 5 minute drive of the site. There is only so much business potential within an area and unless trade is attracted from outside the vicinity (leading to more congestion) this will only mean job losses or restructuring within Asda and Morrisons.

Costa Coffee - How can you justify a drive thru coffee shop in a predominantly residential area, which will be open to 11.00 pm? Not only will this generate anti social noise and light pollution, but if other takeaways in the area are anything to go by, an abundance of litter which will be left for local residents to clear up.

Happy Days nursery - I am appalled that a pre school nursery is proposed in an area which is bordered by the A40 and Grovefield Way, both heavily used major routes which generate significant amounts of car and lorry pollution, especially when stationary vehicles are stuck in queues.

I speak not only a mother of a 5 year old, but as an occupational therapist dealing with young adults who have profound multiple learning difficulties. No child's health should be put at risk through a development that is neither needed or wanted.(There are existing local nurseries whose future will be in doubt if this proceeds.)

Offices - If there is a demand why are there empty offices in Cheltenham?

Design - As far as I can see this is an "identikit" development that can be found anywhere in the country. There seems to be little, if any thought, behind it. I wonder if a standard computer model has simply been adapted to fill the space? The BMW building is already an eyesore and to have it lit up at night, when the showroom is closed, is an insult to the neighbours opposite. The proposed Costa and Aldi will just rub salt into the wound.

This development is neither needed or wanted and must be refused.

Comments: 2nd October 2018

I was very glad to see that the latest drawings submitted by the developers show that the drive through Costa Coffee has been superseded by an office building.

However this does not change my views on this application which I submitted on 4 July 2018. It still raises a number of questions which need to be answered:

a) Can we be sure that the removal of the Costa Coffee is a permanent decision and one that will not be reversed by a variation application, once any approval has been given?

b) While the removal of the Costa on the plans is a small adjustment in terms of the architect's plans , it does represent a significant change in land use. So why was not another full application submitted and what is to stop the developers making further changes on this plan?

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c) At the time of writing there are no accompanying statements to explain the removal of Costa. I also note that many of the drawings are labelled as "indicative". What does this mean?

d) I notice that the corporate logos of Ridge and Bloor Homes are shown on the office buildings. Does this indicate that the developers have secured tenancy contracts with these companies or are they shown for illustration purposes to give more apparent weight to the application?

Even if all these questions are answered it does not satisfy the concerns of the community and its visitors. These include:

a) The lack of capacity in the road system to cope with any additional traffic generated, together with any associated increase in pollution.

b) The question of an over supply of retail facilities in the area and any potential decision to build a new supermarket, ahead of Cheltenham's Retail Review.

c) The lack of adequate parking provision for both potential site employees and customers.

d) The questionable suitability of placing a pre school nursery in a heavily polluted area and one that appears to be situated near the delivery path of 32 ton supermarket delivery lorries.

e) The removal of green belt land and the loss of valuable wildlife habitat. I believe deer, kestrels, buzzards and even stoats have been in the area.

Unless the developers are able to bring new significant firm evidence to support this application, it should be rejected again.

The two applications for this development have already attracted 488 objections. Are the developers not getting the message?

At the current time these applications are using very valuable Council time which could be used more effectively elsewhere.

Maymyo
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RD

Comments: 12th June 2018

I object to the Corinthian Park Planning Application.

The development is clearly designed to meet the perceived needs of those employed within the development and shows no scope for integration with or improvement of the rest of the community. There is no benefit to the greater community in the provision of another supermarket and drive-thru coffee shop. In fact these and the nursery will have negative impacts on local infrastructure, residents, established local businesses and the wider community. It also shows a disregard for established planning permissions in the proposals for retail outlets and the nursery business. On this basis alone permission should not be granted, however I also object on the following grounds:

Adequacy of Parking/Loading/Turning - for a site that plans to employ over 1000 people, it is naïve or a wilful disregard for reality to propose 346 parking spaces as sufficient. The office site next to Asda has woefully insufficient parking, with a third to half the cars brought on to the site unable to park in provisioned places, causing imaginative and often illegal use of the surrounding paving.

The proposal states the proposed Aldi will receive deliveries via a large HGV once per day, with two a day at peak times such as Christmas and Easter (per the Delivery Management Plan). The proposal states that deliveries will be planned to ensure only one vehicle will be on site at a time. This again shows a lack of foresight not to accommodate the idea (and plan for the eventuality) that if there is an expectation of two deliveries a day, there may be two HGV's on site at the same time, and that neither of these deliveries will coincide with a refuse collection, which will require access to the same side of the building. The requirement of a pedestrian marshall to guide large vehicles through a car park highlights the poor quality of this plan.

Highway safety - there is no plan here to integrate this site into the wider area. If pedestrians were to leave the site - site employees who are not parked on site, or children attending the nursery for example - the crossing places over Grovefield Way are not adequate given the increase in traffic and the 40mph speed limit on this road. The extra, continual traffic produced by the Costa and Aldi will make this situation worse.

Traffic Generation - the site will generate a large increase in traffic in the area with no proposals as to how adjoining roads and junctions will cope. The site itself will not be able to cope with the volume of parked traffic, again, less than 350 parking spaces for the proposed number of people employed on the site is inadequate. This will create and compound parking issues in the local residential area already well documented here and elsewhere.

Layout and Density of Building - the layout of the proposal puts the Nursery in a position where a large proportion of road traffic on the site will pass it on one side and the vehicles Aldi customers will be driving and parking on the opposite side. Children and staff attending the Nursery will be subjected to day long noise and air pollution. If there is need of a nursery on this site, it would be much better placed out of the way, for example at the western end of the site.

Road Access - There is no provision to adequately control traffic turning right into the site (where the majority of traffic will come from) other than a filter lane that accommodates approx 6 cars. This will not be sufficient at peak times, if at all. Traffic already significantly builds up when cars want to turn right onto North Road West at peak times. The exit/entry point of the proposed site will duplicate and compound this issue.

19 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 12th June 2018

I wish to object to the planning application on the following grounds:

1. Impact to Highways and Local Traffic

Since moving to the local area 10 years ago we have seen a substantial rise in traffic volume, noise and pollution on Hatherley Lane. This has largely been caused by the developments at Asda, Home Bargains and BMW. My concerns with the Traffic Assessment (Ref: TRANSPORT_ASSESSMENT_TEXT_FIGURES-874168.pdf) submitted as part of the application are as follows:

a) The survey, conducted between 06th - 12th July 2016 took place nearly 2 years ago and fails to take into account the increased traffic resulting from BMW as well as more recent traffic trends.

b) Whilst the paper acknowledges that the survey concluded 9 working days before the start of the Gloucestershire County Council school holidays, it fails to highlight that it took place during the holiday period for independent schools. It also fails to recognise that this is a popular holiday

period for people without dependents of school age. I believe that this would have a statistically significant impact on the numbers presented.

My conclusion from observations a) and b) are that the data is not a reliable source upon which to make a decision and that a new survey should be undertaken.

c) I strongly object to the assumption that the proposed development "will not have a material impact on the operation of the local highway network during the weekday AM and PM peak hours" (6.2). I believe that the impact of the 'Costa Drive Thru' has been significantly underestimated in the paper. From my experience, I believe it is likely that many commuters will divert their journeys to obtain a coffee using the proposed 'drive thru' facility before proceeding to their place of work. Many will then continue into Cheltenham via Hatherley Lane (or other local routes which avoid having to queue to re-join the A40 at the Arle Court roundabout). This will affect local traffic across the wider local area (e.g. Hatherley, Warden Hill). I also believe it likely that many contractors working at GCHQ who park at B&Q or the Arle Court Park and Ride facility, will decide to extend their journey by a few extra minutes to purchase a coffee before parking. Each person that does this will effectively use the 'B&Q' roundabout twice (once on their way through, and again when they return to park for the day).

For those people that do not realise how popular Costa Drive Thru's are then I recommend looking at the Lydiard Fields Business Park near J16 of the M4 which has a constant stream of traffic and queues during the AM rush hour and lunchtime each week day.

2. The local 'need' for the facilities.

I do not believe there is a local need for a majority of the services proposed within this development.

a) Costa Drive Thru - as the name implies, the facility is there to encourage people to drive to it and is therefore of little attraction to the local population, cyclists or bus users. The area is already well served by the local Asda cafe, KFC, Harvester and the burger van in the B&Q car park.

b) Aldi Supermarket - the local area already contains a variety of supermarkets. Asda, Home Bargains and Morrisons all lie within the immediate area. Within a 5-mile radius there are large supermarkets in the form of Tesco, Sainsbury's, Waitrose and Aldi. A wide range of additional choices are also available through online grocery shopping.

c) Office Space - the 'Pure Offices' located in the Asda development are still advertising office space several years after opening so I fail to understand how there can be a need for additional facilities of this type.

Comments: 22nd September 2018

I wish to object to the planning application on the following grounds:

1. Impact to Highways

Since moving to the local area 10 years ago we have seen a substantial rise in traffic volume, noise and pollution on Hatherley Lane. This has largely been caused by the developments at Asda, Home Bargains and BMW. My concerns with the Traffic Assessment (Ref: TRANSPORT_ASSESSMENT_TEXT_FIGURES-874168.pdf) submitted as part of the application are as follows:

a) The survey, conducted between 06th - 12th July 2016 took place nearly 2 years ago and fails to take into account the increased traffic resulting from BMW as well as more recent traffic trends.

b) Whilst the paper acknowledges that the survey concluded 9 working days before the start of the Gloucestershire County Council school holidays, it fails to highlight that it took place during

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the holiday period for independent schools. It also fails to recognise that this is a popular holiday period for people without dependents of school age. I believe that this would have a statistically significant impact on the numbers presented.

My conclusion from observations a) and b) are that the data is not a reliable source upon which to make a decision and that a new survey should be undertaken.

2. The local 'need' for the facilities.

I do not believe there is a local need for a majority of the services proposed within this development.

a) Aldi Supermarket - the local area already contains a variety of supermarkets. Asda, Home Bargains and Morrisons all lie within the immediate area. Within a 5 mile radius there are large supermarkets in the form of Tesco, Sainsbury's, Waitrose and Aldi. A wide range of additional choices are also available through online grocery shopping.

b) Office Space - the 'Pure Offices' located in the Asda development are still advertising office space. We do not need yet more unused office space.

c) Whilst I welcome the removal of the Costa Drive Thru, what protections are in place to prevent one of the offices being 're-purposed' in the future to allow for this via the back door?

42 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 11th June 2018

I am surprised and disappointed this planning application is even being considered. The initial one was reviewed by many locals who complained on a number of issues, and many will be surprised it has appeared again so quickly. How many times can this be repeated? Until everyone is worn down?

This should not be allowed to continue, the size of buildings is huge, the traffic will increase totally beyond what the roads are able to handle. At peak times the roads are unable to handle the current traffic, and this will make all that much worse.

Car parking allocation is never enough, the Pure Offices have one parking place per office, where 4 - 6 people may work, maybe the council is suggesting jobs are allocated according to someones current location and not ability to perform the job? Where do these cars park? The park and ride and surrounding areas are getting more parked up, this will expand the area where cars are parking on roads and causing issues with the traffic flow.

This is green belt area and should stay as such.

Really? Does Cheltenham really need another coffee shop, and another supermarket in such a small area, this would be the third.

This was rejected before and should be again, there is nothing to indicate the proposal has been suitably altered to allow it to proceed - after all the same units are being requested.

Comments: 30th September 2018

Having previously objected I am writing to confirm my continued objection of the revised plans.

The development would increase traffic flow and pollution

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A supermarket would divert custom from other local options so overall no increase of sales just spread out

A nursery should not be built close to large roads including the motorway for health reasons

There are unused offices available at Pure offices

This request should again be rejected.

44 Cleevelands Drive
Cheltenham
Gloucestershire
GL50 4QB

Comments: 14th June 2018

Although not a resident in the area we are concerned about this unnecessary development on Green Belt land.

We regularly visit our family who live in North Road West and this is already a busy road made more hazardous by people from BMW parking along it. This problem will only increase with further development. The planned development is an unnecessary use of Green Belt land. There are enough supermarkets in the area and fast food outlets.

There is a wonderful local playgroup which makes good use of the modern community hall built for the area.

We both strongly object to this application.

10 North Road West

Comments: 4th June 2018

With respect to the proposed development near the BMW garage off Grovefield way I'd like to make the following comments. There have been many emails I've sent in regarding this - so please assume ALL previous emails/objections/notifications on file still should be considered by the planning department. Of particular note:

- North Road West - this is a 50mph road that is becoming a car park at times and is the main pedestrian access route to the community centre. Please consider the dangers of resident's cars pulling out and pedestrians having to walk on the road (as the parked cars often use up the pavement)

Note: - yes *I* know the residential part of the road is only 30mph - but it evidence shows that other drivers don't!

- I was pleased to see there was (was appears to be) a tree line between North Road West and the development and the delivery areas for the nearest shop do not appear to be on the 'resident-side' of the shop. However this 'tree line' seems to be a climb down from the earthworks+treeline promised originally. I would like to have a earth mound protecting visual amenity - instead of relying on just sparse trees. As I understand the BMW development (unsurprisingly) cut down some trees that they didn't particularly like. Please assume any other commercial property will take a similar attitude towards residents' interests. And earth mound provides more assurance that the developers won't make their promises to get planning permission and 'conveniently' forget them a few years later.

62 Greatfield Lane
Up Hatherley
Cheltenham
Gloucestershire
GL51 3QU

Comments: 4th June 2018
Letter attached.

Comments: 5th October 2018
Letter attached.

5 Shakespeare Cottages
North Road West
The Reddings
Cheltenham
GL51 6RF

Comments: 7th June 2018
Letter attached.

Comments: 8th October 2018
Letter attached.

18 St James South
1 Jessop Avenue
Cheltenham
Gloucestershire
GL50 3SP

Comments: 7th June 2018
Letter attached.

3 Rhapsody Court
Cheltenham
Gloucestershire
GL51 6GD

Comments: 12th June 2018

There is no need for a new nursery. An excellent playgroup exists on North Rd East, which currently has spaces for new children. A new nursery may pose a threat to the continued running of this one, which would be a great loss to the community.

There are already bad safety issues caused by staff at BMW parking in nearby streets as well as members of the public test driving vehicles without care and at excessive speeds along Grovesfield Way and Cold Pool Lane.

The roundabout at B&Q already becomes very congested at rush hour and this will be made worse by new places of employment being out on this site.

44 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 13th June 2018

The server has been unavailable for 2 evenings and I am therefore lodging my objection on this form. Please can you acknowledge receipt of this.

I object to the planning application as follows

1. Green belt erosion
2. Current planning permission is for B1 employment development only. The Aldi development is categorised as A1 which should not be allowed.
3. There is insufficient parking on the proposed development for the B1 offices which will have a negative impact on local roads and the Park and Ride, there is already an issue with this and the proposed development will make this worse.
4. There could be increased congestion on already very busy roads. There are already Asda and Morrisons supermarkets in the vicinity and therefore another Aldi supermarket is not necessary.

Cooinda
Old Reddings Road
Cheltenham
GL51 6RZ

Comments: 13th June 2018

We write to voice our objections to the above application.

We would support wholeheartedly and reiterate all points raised by the Reddings Residents Association's objections written on behalf of the Reddings community.

In particular the fact that traffic volume on Grovefield way, the BQ roundabout and Arle Court roundabout is already at saturation point. Consequent increased pollution also needs to be considered.

Further development in the area is totally unnecessary and a duplication of existing facilities. It will exacerbate the above issues and impact on the community's health and ability to conduct normal day to day activities.

17 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 14th June 2018

I object to this application.

The increase in road and noise pollution for the area will increase significantly. We already see Hatherley Lane being used as a rat run with a significant increase in traffic since the Asda and BMW developments. I also see increasingly dangerous parking in Hatherley Lane as a result of these most recent developments that will only get worse with this proposed development.

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I also note the Arle Court roundabout will be operating at over 100% capacity should these developments progress. There is no clear plan to address this and the impact on local residents.

Does Cheltenham need another Costa Coffee? Do we need another supermarket within striking distance of Asda and Morrisons? In my opinion absolutely not.

This is greenbelt land on a side of Cheltenham that has a dearth of greenery.

Comments: 6th October 2018

I write to raise my objection to the updated proposed planning application.

I do not consider any of my previous objections have been taken into consideration with this revised planning application.

My immediate objection is to the lack of a thorough and realistic infrastructure and traffic plan. Since the development of Asda and BMW in the area the Park & Ride and Arle Court roundabouts have seen a significant increase in capacity. This means at many times throughout the day, and most noticeably during rush hour both of these roundabouts are log-jammed.

This application does not address the increase in traffic that will result and this will cause a knock on detrimental impact on the local community - from traffic and noise pollution.

Additionally, the applicant's transport analysis predicts up to 282 arrivals and departures every hour at Aldi. Much of this is predicted at the weekend and evenings. How will these fit adequately into the 102 car parking spaces being provided?

The local area and roads will be impacted from this additional volume of traffic and parking will no doubt occur on the local residents streets.

26 Egdon Crescent
Badgeworth
Cheltenham
GL51 6GF

Comments: 21st June 2018

I find it firstly arrogant and disrespectful that this application has again been put forward despite being rejected for very valid and sensible reasons, not so long ago.

This proposal will increase traffic congestion, pollution and noise. Traffic at the Arle court roundabout is practically at a standstill during peak times. I avoid that route because of this and drive down Cold Pool Lane instead. Traffic down this lane is growing, which no doubt local residents are not enamoured about for the same reasons. Traffic speed is also noticeably increasing down Grovesfield way. With further businesses being proposed, late opening of Costa and a supermarket. This will result in traffic and noise late at night and early morning due to customers and delivery lorries, 7 days a week.

With the nation in the grip of a Diabetes Type 2 epidemic and rising obesity. Building a drive through eating place selling high calorie Latte's and muffins is also not beneficial for the health of the population. Though with the heavy traffic, it is likely consumers will need to park in local streets, like BMW staff are doing due to inadequate parking spaces (Arle court park and ride always full) and have to walk to Costa.

We already have two supermarkets in the area and other stores/ eating places which is more than adequate. Another is not only unnecessary, but it will take business away from established businesses, and small local shops such as Springfield Stores. This will not only put local

employment at risk, but it will discourage people from going to the town centre, having a further detrimental effect on businesses there.

There are already office buildings not occupied next to Asda, so why do we need more ? Is this just a ploy to turn them into something else if no occupiers are found ?

I also doubt the planned landscaping will provide any screen visually or audibly from the proposed buildings.

1 Shakespeare Cottages
North Road West
The Reddings
Cheltenham
GL51 6RF

Comments: 5th June 2018
Letter attached.

Comments: 2nd October 2018
Letter attached.

6 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 11th June 2018

I object the proposed development due to concern about the already heavy traffic which will increase, increased noise for local residents, and the subsequent increase in pollution.

Grovefield Way and the Arle Court roundabout are already extremely busy, and further traffic which would be caused by the Aldi and Costa in particular will make the area dangerous.

Comments: 4th October 2018

The new proposal still does not address any of the main issues that the new development would cause to residents, competitor businesses, wildlife, and safety of pedestrians and cyclists. The increased traffic in an area which is simply not designed to handle such traffic will be extremely dangerous for anyone nearby to or visiting the area. The Greenbelt will be destroyed. Local residents will suffer from increased noise, pollution, light, and lack of parking, as it is clear that the proposed site does not have adequate parking for what it is intended for. The roads are already chaotic and dangerous due to volume of traffic and inadequate parking provided by BMW, and this development would add to the problem. I also cannot understand how a nursery would be justified in a highly polluted area. Another food store is certainly not required with other stores in very close proximity, and neighbouring offices are not at capacity as it is.

89 Redgrove Park
Cheltenham
GL51 6QZ

Comments: 13th June 2018

I object as this is an incursion into Greenbelt land, traffic infrastructure is already inadequate, noise, light and fume pollution will all be increased.

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Recent developments in the area have already much increased the volume of traffic and in my personal experience, as a cyclist, there is also more frustration and risk taking by drivers of vehicles as they attempt to make progress. There have been serious accidents in recent years.

I object because the infrastructure, including roads does not support the current traffic levels, especially at peak hours of shopping and commuting.

3 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 19th June 2018

Having spent a lot of time and effort trying to place my objections to the above application on the Planning Website I am, in desperation, e-mailing you with the request to place it on for me.

This development, which has been turned down once, has been minimally tweaked, in order for re-submission. The previous objections all remain:

- The traffic has actually become more of a problem since BMW development. Hatherley Lane/Hatherley Road is extremely congested at times, which as this road leads to the B and Q roundabout is adding to a traffic situation which is getting worse exponentially and will have life threatening outcomes. Please do consider the local traffic problem very carefully - this is a question of safety.
- There is very little chance of increased employment, only a redistribution of personnel from other businesses. Another supermarket is really not necessary or wanted - and if permission is given now it does raise the question 'why'.

There will not be a boost to local economy - these are international companies.

The impact environmentally is horrendous - the water run off has become a huge problem to local farmers (please do ask them - there was a very distressed appeal by individuals and farmers at the Reddings Resident Meeting to oppose this development).

The air quality which I understand has been measured and deemed good - well we can probably say goodbye to that if this development goes ahead.

I think probably the only wildlife to prosper in this development will be of the rodent variety, a problem we really don't want increased!

I would question the accuracy of the drawings we have seen; Aldi seems to have very few car parking spaces and indeed some massive trees!

Really as a summary a cost benefit analysis of this application is that it does not benefit the population of Cheltenham at all; Aldi and Costa may benefit but at the expense of other businesses and is particularly harmful in terms of groundwater runoff, air quality and to the safety of other road users.

Why would they re-apply, the problems that existed before are still there and I really hope that the Planning Committee do see and accept these problems.

8 Orchard Close
The Reddings
Cheltenham
Gloucestershire
GL51 6LD

Comments: 14th June 2018

I think this planning application has been very poorly thought out and is in fact not a lot different to the original refused one.

The addition of the BMW garage has already increased flooding in the area and lots of parking issues in the locality.

This piece of land used to act as a soakaway and these plans will cause further flooding issues in the area.

The supermarket and coffee shop will bring a new level of light pollution to the area and the economic research completed is nonsense at best showing how it will affect so many local jobs and further impact on local independent businesses.

All of this is before we look at the loss of habitat for wildlife.

Flowerdale House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 2nd October 2018

I have raised objections previously to all applications on this site from 2006. These are well documented in your records.

Essentially this was a Green Belt site which formed part of the buffer between West Cheltenham and Churchdown. I know that this particular site was removed from the Green Belt earlier this year, but nonetheless the existing development of the BMW garage and the agreed low level B1 Office development already agreed have had (and will have) a significant impact on the semi rural nature of The Reddings residential area. Further development is unwelcome and inappropriate

A minor change to this controversial scheme to change a coffee shop to an office is distracting and is seen as taking the opportunity to evidence a decline in opposition to development on this site merely because, like me, fellow residents are tired of writing endless objections to this unnecessary process of extracting as much profit out of this site. I am fully expectant that if approved as B1 a change of use back to a coffee shop will be forthcoming.

My objections remain as follows:

1. Traffic - The SW Cheltenham Distributor Road (Grovefield Way) is unable to cope with current traffic levels at peak times
2. Parking - the site allows insufficient parking for the current BMW workforce meaning they use up space in the free Park & Ride facility, clog up residential roads (impacting on local residents) or park on the bus stop and other gateways in Grovefield Way.

3. Retail and subsequent anti-social hours - Any aspect of retail will have a significant impact on the lives of those who have lived for many years in the vicinity of this development through extended opening hours and deliveries.

4. Environmental Issues - Removal of the natural screening on the site from both the A40 side and the Grovefield Way side has been detrimental to the local wildlife. In addition, extra hard surfacing has already led to well documented problems with localised "run-off" flooding.

5. Job Creation - There are plenty of similar retail facilities within close proximity to this site (Asda, KFC, Morrisons and local stores in the Reddings, Hatherley and Benhall). Aldi will no doubt pick up business at the expense of Asda and Morrisons so any jobs created on this site will be nullified by loss of jobs at these other sites.

6. The Reddings is a semi rural residential area as evidenced by the well used Community Centre which is immediately adjacent to this site.

A low rise office development, whilst not welcomed, as already approved is the only acceptable solution to this site.

If BMW do not want to develop out the existing B1 office planning permission then they should be encouraged to donate the site to the local authority to allow for a much needed expansion of the Park & Ride facility. This will encourage more people to use this service and help to prevent the death of Cheltenham Town Centre through the difficulties created by closing Boots Corner and the significant reduction in town centre facilities for parking cars.

Please refuse all further applications on this site. As a council you must insist that the current development is built out within the current period of permission or the permission should be withdrawn

3 Loweswater Road
Cheltenham
GL51 3AZ

Comments: 29th May 2018

I write to raise objection to the application by Hinton Properties (Grovefield Way) Ltd with regards to Land at Grovefield way.

The site was granted at appeal in 2006 B1 status along with a extension to the park and ride at the end of Grovefield Way.

At the time of the initial application the land fell into Greenbelt, Greenbelt are areas set up around towns, cities and large built up areas with the primary objective to prevent urban sprawl by leaving the land undeveloped.

The Planning Inspector decided that Greenbelt in this instance was not sacrosanct and allowed B1 use although the primary objective of this Greenbelt is to prevent Cheltenham town joining Gloucester City.

The permission granted at that time in 2006, at appeal was for B1 use (Offices) and although tearing up the Greenbelt for speculative development is hard to understand the inspector at that time had his reasons for doing so.

Since that time some 12 years ago we have not seen any works to construct Offices other than BMW's showroom where vehicle manufacture and repair would typically fall under this category, with vehicle repair shops being classified in a similar fashion to a light industrial unit, which mixes an industrial area with an office area too.

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The new BMW showroom does not really add to employment in the area, all it does is to bring the operation at Tewkesbury Road, Cheltenham (3 miles away) and Coles Avenue, Gloucester (9 miles away) together. The employees at Coles Avenue have to commute further to work.

If we consider the office stock in Cheltenham the majority of it had been modified Georgian building which although were used are not suitable for modern A1 open plan offices, these older offices have been or are in the progress of being converted to retirement and nursing homes.

The former Spirax Sarco, Kraft and Chelsea Building Society sites to name a few.

The EPC (Energy Performance Certificates) for older properties have been regulated to a degree that any property falling into category F and G will require improvement prior to being let, this threshold will rise to category E in 2023.

Returns on high investment to comply as an commercial office have led to these properties being converted to retirement/nursing homes.

Looking at small offices and serviced offices they are quite abundant in Cheltenham but new A1 quality offices there is only one being constructed in Jessophs avenue due to be completed in the first quarter of 2019.

If a company choose to relocate, centralise or set up a regional office in Cheltenham then the offices on offer to fulfill this purpose are next to zero.

Unless land is set aside and offices built the status quo will remain, the previous Planning Inspector in hindsight may have taken this view, in turning over the use of Greenbelt.

The current application is for mixed use and examining each one in turn is there a demand for these services.

Child day nursery, there is a day nursery operating opposite the site, again this is not B1 use and will likely have an effect on the existing Nursery.

Supermarket, we have a large supermarket adjacent to the site and another less than 2 miles away along with a number of convenience stores, again this is not B1 use, It is likely to lead to more traffic in an already gridlocked area by diverting users of Aldi who live this side of town to it.

There is no guarantee that Aldi will not simply close the other site in Cheltenham having obtained a bespoke premises.

Drive through Coffee shops, we have a number of coffee shops located in supermarkets adjacent to the site and DIY stores, again this is not B1 use. Drive through tend to end up polluting other properties, one cannot drive a car and drink a hot cup of coffee so clients will drive to the nearest layby or free car park e.g B&Q, Asda, drink their coffee and abandon the cup.

As I have seen with drive through fast food outlets you do not have to drive very far to find the discarded cartons.

Hinton Properties (Grovefield Way) Ltd have through the appeal process obtained planning permission for B1 usage on the grounds of employment and 12 years later have not showed that B1 usage was not attainable.

There is no empty office block that has remained empty on that site for this period of time, surely if it was built (and they have planning permission for it) then this would of only added some weight to their application.

The hybrid scheme appears to be planning by stealth, this being force through an application at appeal by using land for employment then look for an end user and apply for a change of use.

If we allow this application to go through where will new quality A1 offices be built, do we simply assign more Greenbelt to fulfil this requirement.

The Joint Core Strategy Plan (Tewkesbury, Cheltenham and Gloucester) has included this site as New Employment Development.

NEW EMPLOYMENT DEVELOPMENT

3.18. Though the emphasis of the Cheltenham Plan's employment strategy is to safeguard relevant sites and premises from inappropriate changes of use, the Plan is also making a small number of employment allocations within the Principal Urban Area. In this way, it is intended to provide further certainty as to where traditional B class employment activities will be concentrated whilst also providing a greater degree of choice and flexibility to the market.

3.19. Each of these employment allocations is considered to be a key employment site and upon completion of built development will be safeguarded from inappropriate changes of use by Policy EM1. It is also intended that land within Cheltenham Borough that is subject to the strategic employment allocations made through the emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, namely, land at West Cheltenham and land at North West Cheltenham will be safeguarded by Policy EM1 on completion of any relevant development.

GROVEFIELD WAY (E3)

3.22. The site occupies a flat parcel of land to the north-west of Grovefield Way, The Reddings on the western periphery of Cheltenham. It lies immediately west of the Gloucestershire County Council Park & Ride facility at Arle Court and is extremely well connected to the strategic highway network along the A40 and to J11 of the M5. Measuring approximately 6.4ha, the allocation provides an opportunity for the establishment of a modern business environment at an important gateway location. The site can be categorised as greenfield and currently benefits from an extant planning consent for B1 employment uses. The Principal Urban Area is being amended to accommodate this allocation and part of the site already houses a flagship car dealership.

3.23. The development or change of use of land for new employment uses at locations not specifically covered by the Cheltenham Plan will be permitted where the proposals accord with Policies SD1 and SD2 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

To allow change of use to this site will simply be tearing up the JCS Plan that has taken hours of hard work over many years to put together.

Comments: 3rd October 2018

The Developer applied for Office use on greenbelt land that was rejected by Cheltenham Borough Council (CBC), the Developer then took the case to planning appeal where the Planning Inspector overturned CBC decision supporting Offices as proposed by the Developer.

Cheltenham had a lot of office space that had been former residential houses extended and converted in the 1960s; this office space was not A1 quality offices space.

There is an every increasing demand to improve the energy efficiency in offices and currently every office must have an Energy Performance Certificate (EPC) allowing it to be let.

As time passes the level of energy conservation is increased forcing property owners to invest in the infrastructure of these buildings to enable them to be let.

Cost to enable a building to be raised to a level to be let can be expensive leading to property to be sold and converted to residential and nursing homes, examples of these are Thirlestaine Hall, Kraft Foods, Spirax Sarco to name a few.

A quick look for office space on the internet hones down to Jessops Avenue where a new office block is currently being completed, others viewed on the web show old office stock which has been refurbished unlike modern open plan floor space.

Any company looking to relocate or set up in Cheltenham has little or no choice, the Planning Inspector decision to overturn greenbelt may be lamented but there are some positive aspects being located to a park and ride.

The Developer's initial application was for Offices and if the Developer had applied for Offices, a Supermarket, day Nursery and drive through coffee shop would the appeals inspector not have rejected it out of hand?

Since the appeal the Developer has only constructed BMW office and it would appear that he is seeking to find tenants to occupy plots on this land as oppose to building the offices that permission has been granted for.

There is little or no A1 quality office space in Cheltenham and this site has been ear marked for office space, if we allow this land to be used for other usage where do we put new offices, do we simple put them on more green belt.

Years have passed since permission was granted and there are NO empty new offices on the site, Cheltenham needs new A1 quality to replace the old stock which has been removed from the market place for other uses, for now and for the future.

No company who wishes to start-up, relocate or expand their business is likely to sit on the side lines and wait until such a time as a tender and construction process takes place when there are new empty office buildings to be had in other locations.

14 Greenmeadows Park,
Bamfurlong Lane
Staverton
Cheltenham
GL51 6SN

Comments: 19th September 2018

I wish to register my strongest objection to the second application (Hybrid Application) for commercial and retail use at North Road West and Grovefield Way, Cheltenham.

I live nearby and use the roads around this site for walking/cycling and have been enjoying the open space. This part of the countryside is also obviously inhabited by wildlife and should not be eroded any further just to provide an unwanted development.

I thought that the original application was firmly rejected by Cheltenham Borough Council in December 2017 and there should be no other reasons put forward by the developers that this original decision should be reversed.

Here are my reasons for objecting:

Traffic - Nothing has been done to ease the congestion of traffic around the BMW development and is chaotic at the Arle Court roundabout and Grovefield Way. Further congestion will obviously be incurred in this area and also into North Road West. More stationary traffic will produce toxic air in and around the area especially near to the children's nursery.

Aldi /Costa- Simply Cheltenham do not need any more Costas and certainly no more supermarkets. There is enough already and many within that area.

Happy Days Nursery - This proposed development will add to the traffic problem as parents have to drive-in/out to drop/pick the children. Has the Council considered not only this problem but also the safety aspects of allowing more traffic outside of this children's nursery?

Absolutely no need for new office developments. Plenty of empty sites in and around Cheltenham

More waste will be seen in and around the area if this application succeeds.

Therefore please note that I wholly and utterly disagree with the proposed development. I hope that Cheltenham Borough Council will see that the development is neither wanted, never requested, nor needed, and will respect and support the wishes of local residents who overwhelmingly do not want the development.

It should be rejected

Southpark Cottage
Chargrove Lane
Shurdington
Gloucestershire
GL514XD

Comments: 6th October 2018

I wish to register my objection to planning application 18/01004/FUL under the following points.

1. The extended development (bolting onto the Vast BMW site, will have severe and adverse effect on residents quality of life. This being easily observed by the near gridlock of traffic at rush hour times and indiscriminate parking by employees when places of employment make no facility for staff to park.
2. A Nursery, REALLY? How unhealthy plan is that for our young persons of the future, sure! Developers go ahead whilst counting your profits, while these youngsters have a possibly shortened life through respiratory problems.

I respectfully request planning officers to reject development of this site at the earliest instance.

Pegasus Group
Pavilion Court
Green Lane
Garforth
Leeds
LS25 2AF

Comments: 21st June 2018

Letter attached.

15 The Grove
Kettering
NN15 7QQ

Comments: 21st June 2018

I will shortly be moving into Cheltenham and wish to object to the above hybrid planning application for the following reasons:

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green

field development is ever permissible. Office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity? And how much demand is there for a drive through coffee shop which is probably also going to generate more litter, of which there is already a vast amount all along the A40 leading into Cheltenham.

2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area? The proposed development will mean that there will be traffic movements from 5.30am to after 11pm - this cannot be acceptable in a residential area.
3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. Following these developments and despite assurances that traffic calming and management measures that were part of their planning approval would be put in place, none have been implemented and the situation will worsen with the new proposed hybrid development. The air quality in the area is already poor and the proposed development will add to this. In addition, from a planning perspective, it seems to me that the roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. Hatherley Lane is severely congested much of the time with traffic backing up on all roads leading to the park and ride roundabout and more development will intensify this problem. I understand that the capacity of the roundabout (already almost at its maximum) could increase to between 103 and 187%. The impact on existing housing and residents in terms of access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.
4. Parking - there is already a big problem with parking along Hatherley Lane. The limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on their site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders. The proposed development is bound to generate more misuse of the car park.

The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed hybrid planning application is refused.

Comments: 9th October 2018

I wish to object to the above planning application

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green field development is ever permissible. Some of the office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity?
2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area? The introduction of Aldi will

simply increase the competition for a finite number of shoppers with the effect that the net employment gain will probably be very low as the other, existing supermarkets are forced to reduce their staff numbers in response to reduced footfall. Indeed the financial forecast in the application is based on displacement of shoppers from Asda and Morrisons.

3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. There has been a very considerable rise in traffic in the Hatherley Lane area, particularly since Asda opened. Despite assurances that traffic calming and management measures would be put in place, none have been implemented and the situation will worsen with the proposed development. How will increased pollution levels be monitored and managed? Is it appropriate that a nursery is part of this development with all its added pollution, noise and traffic?
4. The application includes predictions of up to 282 vehicle movements per hour for much of the weekend in a car park that will have 102 spaces. Just how will this work and how will the Arle Court roundabout cope with this? It is already extremely difficult to get onto the roundabout from the feeder roads at peak work times and now it seems there will be increased congestion at weekends as well.
5. The roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. The impact on existing housing and residents in terms of access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.
6. Parking - there is already a big problem with parking along Hatherley Lane which made manoeuvring out of Wade Court difficult and dangerous. The very limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on the site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders like me. The proposed development is bound to generate more misuse of the car park.
7. The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed hybrid planning application is refused

Tara
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 27th June 2018
Letter attached.

17 Barrington Avenue
The Reddings
Cheltenham

Gloucestershire
GL51 6TY

Comments: 11th June 2018

I am registering my objection to the new proposal for the above development, which still includes an Aldi supermarket, which is not necessary as we have an Asda and Home Bargains which already supply our needs, and which would suffer from the competition.

The Costa Coffee outlet included in the new proposal is unnecessary as Asda already has a cafe which provides this.

The Childrens nursery, also included is not needed , as we already have an established one in the community centre, employing local residents, which is quite adequate .

Obviously, highway safety , traffic generation, noise and disturbance resulting from use, and road access would be compromised, as it has already been since the adjacent BMW showroom was built.

6 Old Reddings Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SD

Comments: 12th June 2018

There is a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF.

Reports previously submitted are now significantly out-of-date and use old, flawed data. The application is not consistent with either the Local Plan (not yet finalised) and is contrary to the current retained Retail Plan.

The reports were drafted before the current editions of the Local Plan and JCS.

Objection reports were filed by other traffic and planning consultants in respect of the previous application. These refute many of the applicant's reports, conclusions and claims. The applicant reports in support of this application do not address them.

This proposal is very different to a B1-only proposal inasmuch as offices are likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day. Also, further light pollution from vehicle headlights shining into windows at all hours would occur.

Traffic was previously bad, and is now considerably worse following the BMW being opened in August 2017. Traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted. This was a significant concern for the planning committee.

Acoustic background noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly compared to the extant B1 permission. The problem is compounded by the applicant having previously felled much of the tree and vegetation screening along the A40 and Grovefield Way to display their BMW building.

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The applicant's projected full time B Class job numbers are misleading and use incorrect numbers.

The very special circumstances in 2007 were to permit the use of premier Greenbelt land for employment purposes with the creation of high value B1 jobs on a large site. The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs..

Altering the site contours and stockpiling of soil from the BMW development has altered the historic ability of the site to absorb storm water run-off from Grovefield Way. This is causing flooding to local houses. The proposed development must account for this water in their designs, having already realigned the entrance road, and missing the chance to improve the highway drainage whilst doing so. The land is low lying and surrounded now by roads destroying the original drainage system. A local spring has also changed course and is causing continuous damage to the adjoining highway "North Road West".

The proposal is not appropriate development in the Greenbelt.

The development does not pass the sequential test because The Reddings area is not recognised in the policies retained in the Local Plan. The NPPF clearly states that if the sequential test is failed, permission should be refused. The sequential test is undoubtedly failed.

It is clear from the applicant's own economic analysis that a combined loss of turnover to Morrisons, Asda and "other" local stores of £6.89m will occur. That represents existing jobs and shops in the local community that will be lost.

The draft unilateral undertaking by the developer on the previous application does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.

There are many flaws in this application that we are surprised that it has been brought forward for consideration, when the previous application identified that only some of the worst aspects of the initial application had been adjusted over the course of several amendments in 2017.

The current application makes only minor cosmetic changes and still fails to properly address the concerns that were raised in the previous application.

I urge you to reject this re-application.

2 Tylea Close
The Reddings
Cheltenham
Gloucestershire
GL51 6RB

Comments: 30th May 2018

Do we need another supermarket in the area?

No. We already have Asda and Morrisons in close proximity. And indeed an Aldi is only a couple of miles away.

Do we need a Costa Coffee?

No. Asda already has a coffee shop and B&Q has a provision as well.

Do we need more office space?

No. There are already large numbers of unused offices within Cheltenham, some of which are in the immediate vicinity of the proposed development.

Do we need another nursery?

Possibly. With the increased numbers of houses being built, the local population has increased. However, the location proposed is completely unsuitable due to the large amount of traffic in the area which will expose any children to noise and pollution.

Conclusion 1: The development is unnecessary and is just crass commercialism.

What will the impact be of the proposed development?

We will have considerably increased traffic on roads that already get gridlocked at certain times of the day. Not to mention the parking issues on roads where staff members of BMW and GCHQ park their cars. The travel plan is inadequate, and based on what has happened with BMW, the council seems uninterested in enforcement.

Increased traffic, also means increased noise and pollution.

Commercial opening hours means more noise and light pollution.

Increased footfall means more litter.

Conclusion 2: The development will have a huge detrimental effect on residents.

Therefore please note that I wholly and utterly disagree with the proposed development. I hope that Cheltenham Borough Council will see that the development is neither wanted, nor needed, and will respect and support the wishes of local residents who overwhelmingly do not want the development.

Comments: 19th September 2018

Do we need another supermarket in the area?

No. We already have Asda and Morrisons in close proximity. And indeed an Aldi is only a couple of miles away.

Do we need a Costa Coffee?

No. Asda already has a coffee shop and B&Q has a provision as well.

Do we need more office space?

No. There are already large numbers of unused offices within Cheltenham, some of which are in the immediate vicinity of the proposed development.

Do we need another nursery?

Possibly. With the increased numbers of houses being built, the local population has increased. However, the location proposed is completely unsuitable due to the large amount of traffic in the area which will expose any children to noise and pollution.

Conclusion 1: The development is unnecessary and is just crass commercialism.

What will the impact be of the proposed development?

We will have considerably increased traffic on roads that already get gridlocked at certain times of the day. Not to mention the parking issues on roads where staff members of BMW and GCHQ park their cars. The travel plan is inadequate, and based on what has happened with BMW, the council seems uninterested in enforcement.

Increased traffic, also means increased noise and pollution.

Commercial opening hours means more noise and light pollution.

Increased footfall means more litter.

Conclusion 2: The development will have a huge detrimental effect on residents.

Therefore please note that I wholly and utterly disagree with the proposed development. I hope that Cheltenham Borough Council will see that the development is neither wanted, nor needed, and will respect and support the wishes of local residents who overwhelmingly do not want the development.

2 Old Reddings Road
Cheltenham
Gloucestershire
GL51 6RZ

Comments: 12th June 2018

Nothing of any significance seems to have changed in this revised application, so my previous objections still stand.

Please log this as an objection to the revised plans.

Bethany House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 12th June 2018

Doesn't 'No' mean 'No'? Or do you just keep tweaking your application until it sneaks through?

None of the original reasons for objection have gone away; the congestion, the pollution, the unused office space next to Asda so why is more required? Asda itself being so close so why another supermarket? A drive through Costa when you have cafe's at Asda, and a drive through KFC? A new nursery when there already is one at The Reddings Community Centre?

15 Appleton Avenue
Cheltenham
Gloucestershire
GL51 6TS

Comments: 12th June 2018

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We stand by our comments in response to the earlier application to develop this site and again register our objection to the proposals.

The Reddings Residents Association have provided a researched and well summarised case of why this development should be refused and we stand by their concerns.

As per our previous comments:

- There is no requirement for yet another supermarket (Asda, Morrisons, Home Bargains are only minutes away). There are also a number of local shops in The Reddings, in Caernarvon Road, and in Benhall.
- There are a number of underutilised office blocks nearby (next to Asda), elsewhere in the town and further afield.
- There are several good day nurseries already existing within a few minutes of the proposed development. Building another nursery is likely to have a negative impact on the existing provisions. These existing facilities also have the advantage that they are not located close to a busy road and motorway.
- The various plans and maps submitted in conjunction with the application emphasise the sheer size and scale of the proposed development. Like the BMW site this is completely out of proportion and out of keeping with the local area.
- The roundabout between B&Q and the Park & Ride is already heavily congested, particularly at rush hour. This, and Hatherley Lane back to the A40, cannot handle any more traffic.
- The parking and travel provisions provided are completely fictitious. Whilst it is nice to assume that people will use public transport, the reality is quite different. BMW staff are already noted to abandon their cars in the several lay-bys adjacent to B&Q. This additional development will only make the situation worse.

It should also be noted that there are now brownfield sites (Whole Foods site and carpet showroom). If Cheltenham needs another supermarket then these would make a more sensible choice, rather than carving up the landscape.

In summary this development is a completely unnecessary, completely out of place, destruction of the countryside. It must be refused immediately. The sheer number of comments previously made on this and the previous application received speak volumes for the feelings that local residents have in opposition to the plans. The planning committee must take note.

44 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 13th June 2018

I wish to object to 18/01004/FUL however there has been server issues for two consecutive evenings. I therefore am using this form to lodge my objection.

I object to the planning application, which is not significantly different from the first application, as follows:

1. Erosion of the green belt

2. Extant planning permission is for B1 employment development only. Including A1 Aldi development is outside of this.
3. Insufficient car parking for the B1 offices which will result in illegal parking on pavements, parking in residential areas etc.
4. Increased congestion on the roads. In particular I have concerns about vehicles waiting to turn right into the proposed development blocking the flow of other vehicles.
5. Focus should be on developing Cheltenham Town Centre

Thank you for taking time to consider my objections.

4 The Grange
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 14th June 2018

Inappropriate Position

This site (Grovefield Way) is not an appropriate site for a retail development. It is not 'out of town' it is adjacent to domestic properties which will be significantly impacted on by retail activity. Unlike a B1 office, which the site has previously been granted permission, a retail site will undoubtedly have 24/7 traffic and noise, due to out of hours deliveries and people visiting. This application suggests that having people sitting drinking coffee outside up to 11pm will be a good thing for the community, that is unless you live in it and are trying to enjoy peace and quiet in your own home and garden.

Allowing this proposal will create a huge area of urban sprawl around an already unsightly BMW building. It is inappropriate to the immediate area and is damaging to the appearance of the approach to Cheltenham town. Please learn from your mistakes and make good the damage which has already been done by allowing BMW to build such an eyesore on the approach into the town.

Need for this Development

With a large number of retail outlets in town closing and with a large supermarket (Asda) literally just around the corner, building another supermarket is completely unnecessary. It will only take business from existing outlets and is likely to cost local jobs rather than provide them. It may well move jobs from the Tewkesbury Road side of town to this side of town - adding to the traffic and parking issues that have appeared since the building of BMW.

This proposal would not make any contribution to the economic prosperity of our town. There is no evidence that this type of development is actually wanted or needed by local or Cheltenham residents generally, who's feelings have been repeatedly ignored - in fact, looking at the reaction of the contributors to this planning application, it is clear that it is neither wanted nor needed.

Flooding

Cheltenham Borough Council has failed to address the issues caused by the same developer's failure to provide adequate site drainage on their BMW site. Flooding is now a significant issue locally and there is no indication that the new development does anything other than exacerbate that. At The Reddings Residents Association AGM a local resident spoke very forcefully about the detrimental impact that development on this site is already having on his land and this additional development will seriously add to that issue.

Hours of Business

There do not appear to be any restrictions imposed on hours of business or the hours of delivery to retail units. Asda has been permitted to deliver 24/7 and now regularly wakes up its residential neighbours in the early hours of the morning. Aldi, Costa Coffee etc will do the same if you permit it. This will significantly impact the health and quality of life of The Reddings Residents and will be in breach of the Borough Council's own promise in the Cheltenham Charter that we can expect to enjoy a healthy life, having positive relationships at home and with the wider community and enjoy the benefits of a sustainable built and natural environment.

Greenbelt

The National Planning Policy Framework, is explicit in stating that Green Belt boundaries should only be altered in exceptional circumstances. This proposal is not an exceptional circumstance with absolutely no evidence of a need for a further supermarket, coffee shop or nursery so the boundary should never have been moved.

Traffic

The inevitable increase in traffic noise and air pollution that would result if this type of retail development were allowed would be intolerable to those of us living locally. We wouldn't just be looking at early morning/early evening increased but 24/7 increases. This would have a major impact on people living in the surrounding area who have made the choice to live in a semi-rural location for a reason. They like the peace and quiet and their rights should be seriously considered.

Litter

Residents already have to clear up huge amounts of rubbish thrown out of cars ruining the appearance of residential roads and the surrounding area and impacting on the wildlife already struggling in the area. Adding another Coffee Shop will no doubt add to this

Wildlife

The impact of overnight security lighting on local wildlife will impact the numbers of nocturnal species in the area including moths, bats and owls. The removal of any hedging and trees is not acceptable - they provide an established wildlife habitat corridor. We have already lost too much of it during the development of BMW. None has been replaced, leaving a complete eyesore for all those of us living in the vicinity.

Please refer to the wildlife report submitted by one of The Reddings Residents showing that at least 461 individual species rely on the habitat in this grid reference for their survival. The Formal Landscaping now present at BMW is stripping our countryside of meaningful habitat. It is resulting in a desert environment for wildlife that is already struggling. The further removal the last remaining existing hedgerows and important endangered Perry pear trees will be an act of major destruction that can never be replaced.

Light and Noise Pollution

The loss of the greenery surrounding BMW has already changed the appearance and character of this area and has resulted in an increase of noise pollution. Grovefield Way had been carefully planted with trees and hedging to screen residents from the noise of the road, so how come BMW have been allowed to remove it and not replace it with similar planting? This has still not been seen to have been addressed by the developers. Take a look at B&Q opposite. They have at least attempted to shield the development from the road and residents. They need to look at doing the same on the BMW side of the road.

The extra 24/7 security lighting required by this type of development will impact on local residents. This is a semi rural location chosen by local residents for that reason and will negatively impact our lives. No consideration or respect has been shown to those living locally, in these revised plans. We have no street lighting in our part of The Reddings so to add 24/7 lighting at the power required will have a really negative impact on our lives.

Conclusion

This is not just a case of NIMBYism, but a genuine concern for the inappropriate nature of this development.

I hope that the Council will see sense, listen to local residents and reject the current revised application. Please draw a line in the sand and say 'no more'.

I plead with the council to think of the surrounding residents whose quality of life has already been negatively impacted when considering these plans.

This plan is largely unchanged from its predecessor which was quite rightly turned down. The developer has made no attempt to address the concerns of the community about this proposal, or their current BMW site. The Council cannot, in good conscience, say that there is any substantial change that warrants this application being passed. It must reject the application and instead should show respect and care to the people who live in the borough.

Comments: 6th October 2018

1. I do welcome the removal of the retail element of Costa and replacing it with B1 offices. However, the "indicative" statement gives no form of commitment, and a variation application could easily be made to convert the unit back to a coffee shop once permission for the remainder of the site has been granted if an "A-class" element is introduced. Precedents for this behaviour were set with the BMW project and we would be naive to believe that history would not repeat itself.
2. The extra planting of native species is also welcomed but can not be trusted. At BMW the planting has all died and has not been replaced leaving the building clearly visible from the road - what a surprise! The planting that was there, before being destroyed by the clearance, was an extra barrier against noise pollution for neighbouring housing and was important habitat for wildlife. Any extra development should include extra planting along Grovefield Way, the Golden Valley, A40 and North Road West and within the development to mitigate the loss of habitat and the lack of a noise barrier. Planters are not adequate. They will be cosmetic and are not wildlife friendly and will not be long lived as can be seen in the Waitrose car park planters which have suffered due to neglect.
3. The scale proposed for Aldi remains unacceptable. The amount of space for parking is inadequate, there is no need for an Aldi here as one already exists a mere 10 minutes drive away. We have Asda and Morrisons literally on its door step. The road system outside the complex is inadequate to cope with the extra retail traffic that will be brought into the area throughout the day. It is also worth noting that according to the financial forecasts within the documents much of the Aldi trade will rely upon displacement from Asda and Morrisons and the net employment gain from this element of the proposal is likely to be very few, if any, low paid jobs.
4. We also do not believe that the site is suitable for a childcare facility with all of the fumes and pollution that will be generated by the development, particularly the retail element, as well as fumes from the enlarged Park and Ride, Grovefield Way and the A40.
5. From analysis of the proposals it is apparent that there is a shortfall in the number of parking spaces being provided. Further research of similar shared sites around the country shows that allocation of parking between staff and public will be an ongoing issue, as well as conflicts with service vehicles. Parking in surrounding roads is already a problem with BMW staff parking on grass verges on North Road West churning up the verges, ruining the look of the area and creating parking hazards down the road.
6. There will be increased traffic trying to turn right out of the development onto an already busy road causing further congestion through out the day. Also, there is inadequate turning right

refuge space from Grovefield Way into the site which will cause dangerous hold ups on a bend in the road, leading to increase in accidents.

7. Deliveries to the retail site will be early morning and late at night which will impact on the noise levels of neighbouring housing. Reversing noise will be heard several miles away and would be unacceptable especially during summer months when windows are open, disturbing the sleep and mental health of people living nearby.
8. The planning committee should stick to the original permission of an office development with sound wildlife consideration.
9. Areas of the proposal are simply not detailed enough, or appear fanciful because it cannot be achieved e.g. re-profiling a 2.5m deep embankment to the boundary of North Road West without destroying the hedge, or getting storm and foul water to flow uphill / not cause local flooding. Also, not causing further disruption to ground water flows as has occurred following BMW, resulting in significant damage to the newly re-surfaced North Road West. A viable and enforceable traffic plan is also required (to minimise on street parking in the surrounding area).

I urge the committee to see sense and refuse the retail aspect of this development and ensure that the former Green Belt status of this site is respected in what ever replaces it.

19 Meadow Close
Cheltenham
Gloucestershire
GL51 0TZ

Comments: 29th May 2018

The information provided about the traffic data is from July 2016 since this time the area has had the completion of the BMW/Mini/Motor-rad garage has increased the traffic with 50 service bays that has to be a minimum of 200 extra cars each day the traffic plan gives the details of the current bus routes 1 bus to the schools in Gloucester and the other 2 busses go to Morrisons and Asda respectively, the data shows very few busses from the traffic counting statistics so that information cannot be accurate! If it is accurate then the new proposed development can't rely on public transport, why would shoppers use public transport to visit a drive thru coffee shop or supermarket when they own a vehicle along with dropping the children off at nursery before and after work? This will just add to the oversubscribed road network. Other developments are the new Bupa Care Home this will have residents staff and deliveries adding to the traffic situation not to mention the 500 additional houses. The Arle Court Island is a real issue that doesn't have traffic management on all exits/approaches this needs urgent improvement as the traffic has increased travel times significantly since 2016 I'm sure a Costa Coffee shop would attract more traffic at peak times the infrastructure needs massive improvement

Alongside the Asda there are offices with low occupancy we don't need more empty buildings. Its notable that since the finished development of the BMW garage cars are parked in the local area along Hatherly Lane and outside houses and the Park and Ride is abused by the staff of the garage.

I would recommend that this application needs to be considered alongside future developments like the film studios development, Cheltenham Cyber Park and the existing facilities beside Asda.

Comments: 18th September 2018

The infrastructure in the area can't cope with this application with the potential additional traffic, I mention additional as the planned business aren't needed so wont be used.

The environmental impact needs further realistic data

If permitted, this will be the 15th Costa Coffee in Cheltenham that is sufficient

8 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 8th June 2018

I object to the Aldi and Costa plans.

This will be an eyesore blocking residents views and light.

There is not enough parking, so workers will park on nearby residential roads causing a nuisance.

The road is already far too busy and dangerous. There are no road upgrade plans to cope with extra traffic.

There will be additional noise and air pollution.

More trees will be lost.

There is an added risk of flooding. No real provision made for this.

This has previously been rejected, so why waste tax payers money.

It affects nature in area, foxes, rabbits, buzzards, pheasants all seen in that area.

This sets a dangerous precedent for the rest of the area.

18 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 11th June 2018

There are already two large Supermarkets within a mile of the site.

Traffic congestion has worsened since the BMW showroom opened and it will get much worse with more development.

We already have numerous Costa Coffees in Cheltenham and do not need another one - the litter and rubbish that will be left by users will make the area look awful.

1 Tylea Close
The Reddings
Cheltenham
Gloucestershire
GL51 6RB

Comments: 12th June 2018

Page 121

The further development at Grovefield along side the BMW Garage is flawed, the access and infrastructure and surrounding roads cannot take the demand they already have on them let alone more traffic.

At peak times the wait to obtain access to the Golden Valley roundabout can take 15 minutes, this is a totally unfair and not wanted in the area.

There is no need for an Aldi's here, we have 2 supermarkets within 2 miles of each other.

Please do not allow the developers to make our lives more difficult with even more traffic.

Woodways
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 13th June 2018

Letter attached.

Comments: 5th October 2018

I am sending this letter of objection to you as your server is down yet again and I need to raise my objections today.

As far as I can see the new plans do not address many of my objections and indeed those of the residents. My previous views still remain and in essence are these.

The proposed Aldi will only create 28 jobs whereas an office unit of the same footprint will create 118 jobs. The argument for building the supermarket does not stack up.

The plans do not address the question of when deliveries will be made to Aldi - late at night/ early morning?

We have yet to be given opening times for the store.

I can envisage parking on the streets around the development at weekends and evenings when the small car park planned gets full.

Has anyone looked into the future problem of fume pollution from the increased traffic?

Is this a good sight for a nursery? I am not sure that I would want a child of mine to attend a nursery in what will be a busy place.

Noise and light pollution have not been addressed by the developer. I still fail to see why BMW were granted such a high level of lighting when B&Q are satisfied with far less.

What impact will this development have on the wildlife? The replanting of the area with non-native species that are so small that they will take years to grow to an acceptable height, will have an impact.

It is my fervent wish that the planning officers take the comments, wishes and fears of the residents into consideration when reviewing these plans.

Thank you for your time.

Tawny Lodge
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 12th June 2018

We wish to strongly object to this revised Planning Application CBC Ref: 18/01004/FUL.

With regard to this revised application we would like to make the following comments:

- Proposed Aldi Supermarket

There is no demand for another supermarket as the area is already served by Asda, a 2 minute walk away and Morrisons which is a 3 minute drive away. There is also an Iceland at Coronation Square. In total there are already 6 existing supermarkets within a 2.5 mile radius of this proposed development, including an existing Aldi on Tewkesbury Road with adequate parking facilities.

- Costa Coffee

There can be little demand for a drive thru Costa Coffee, when there is a Costa Coffee at Asda and that coffee is available at both KFC and the mobile unit at B&Q.

- Day Nursery

There is already an excellent Playgroup in existence at The Reddings Community Centre in North Road West which overlooks this proposed development. We are at a loss as to understand why another would be necessary just metres away.

- Traffic Congestion

The existing Asda site and Retail Park comprising of B&Q, Home Bargains and Pets at Home plus the Park & Ride collectively has created enormous traffic congestion especially at peak times. The increase in traffic causes total 'gridlock' at peak times with traffic back up's to the Golden Valley and beyond. Any further development will create a total mayhem and further exasperation to the residents of Up Hatherley and The Reddings. The Reddings (Badgeworth Lane to Grovefield Way), The Reddings Road and Hatherley Lane have become 'rat runs'. Every morning and evening traffic along Hatherley Road towards the town centre is significantly heavier than it used to be. This will become considerably worse if the application is approved.

- Light Pollution

The application makes no mention of light pollution. With the proposed operating hours, there will need to be a degree of onsite lighting, which will intrude into nearby Residencies.

In conclusion, we strongly object to this Planning Application on the grounds there is little or no support to sacrifice precious Green Belt land for facilities that already exist within a few minutes walking/driving distance from the proposed development. We hope that the Planning Authorities will listen to reason and take into account the views and wishes of the Local Residents.

29 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 11th June 2018

I strongly object to this application on the following grounds:-

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1) Erosion of the Green Belt: The area of the proposed development is a green belt area. Over the last 15-20 years there has been a steady and gradual reduction in the green belt as commercial properties have been built (e.g. Asda, B&Q, KFC, Park & Ride, BMW, etc). This needs to stop now to preserve the remaining green belt areas. Please take a stand for both now and the future.

2) Increase in traffic congestion: Grovefield way is unsuitable for the existing volume of traffic at peak times particularly since the opening of the new BMW dealership. Should the proposed development go ahead then the traffic congestion will become chronic, badly affecting the local residents and the flow of traffic through the area ... bearing in-mind that Grovefield way is meant to be a bypass road.

3) Parking in the local area: There will be an increase in parking in nearby roads from customers and employees of the new amenities. This has been proved by BMW staff not being allowed to park onsite and thereby parking in nearby areas (e.g. on pavements) with subsequent risks to the health and safety of local residents.

3) Increase in Pollution; There will be an increase in noise and car fumes due to increase traffic in the area, unloading of delivery vehicles at potentially unsociable hours and traffic being stationary in queues

4) Unfounded Requirements; The need for an additional superstore, nursery and coffee shop are unfounded as they are already met by existing businesses in the area (e.g. Asda Superstore on Hatherley Lane).

5) Damage to wildlife: The loss of natural habitat in the area will dramatically affect the wildlife.

Further, this planning proposal is very similar to the previous one that was submitted last year. Surely one would expect to see a significant difference in the proposals in order for the planning permission to be considered by the council.

Comments: 20th September 2018

I strongly object to this application on the following grounds:-

1) Erosion of the Green Belt: The area of the proposed development is a green belt area. Over the last 15-20 years there has been a steady and gradual reduction in the green belt as commercial properties have been built (e.g. Asda, B&Q, KFC, Park & Ride, BMW, etc). This needs to stop now to preserve the remaining green belt areas. Please take a stand for both now and the future.

2) Increase in traffic congestion: Grovefield way is unsuitable for the existing volume of traffic at peak times particularly since the opening of the new BMW dealership. Should the proposed development go ahead then the traffic congestion will become chronic, badly affecting the local residents and the flow of traffic through the area ... bearing in-mind that Grovefield way is meant to be a bypass road.

3) Parking in the local area: There will be an increase in parking in nearby roads from customers and employees of the new amenities. This has been proved by BMW staff not being allowed to park onsite and thereby parking in nearby areas (e.g. on pavements) with subsequent risks to the health and safety of local residents.

3) Increase in Pollution; There will be an increase in noise and car fumes due to increase traffic in the area and unloading of delivery vehicles at potentially unsociable hours. Further, the previous BMW development removed almost all of the natural screening thereby exacerbating the issue. Lastly, this would provide an unsuitable environment in which to operate a pre-school nursery as stated in the proposal.

4) Flooding: This development would further increase the issue of flooding to local houses due to insufficient water run off during storms. This has become an issue since the BMW development.

5) Damage to wildlife: The loss of natural habitat in the area will dramatically affect the wildlife.

Further, this planning proposal is very similar to the previous one. Surely one would expect to see a significant difference in the proposals in order for the planning permission to be reconsidered by the council.

18B Wade Court
Cheltenham
Gloucestershire
GL51 6NL

Comments: 4th June 2018

Letter attached.

Comments: 8th October 2018

Once again (the third or fourth time I think?) I find myself submitting my objections to this planning application. My objections remain broadly the same as before despite the small amendments that have been made to each version of the application, though I note with relief the removal of the drive thru coffee shop. My objections are as follows:

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green field development is ever permissible. Some of the office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity?

2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area? The introduction of Aldi will simply increase the competition for a finite number of shoppers with the effect that the net employment gain will probably be very low as the other, existing supermarkets are forced to reduce their staff numbers in response to reduced footfall. Indeed the financial forecast in the application is based on displacement of shoppers from Asda and Morrisons.

3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. I moved into Wade Court on Hatherley Lane in 2001 and have seen a huge rise in traffic, particularly since Asda opened. Despite assurances that traffic calming and management measures would be put in place, none have been implemented and the situation will worsen with the proposed development. I have had asthma for a number of years but last year this had developed into Chronic Obstructive Pulmonary Disease and I'm certain that the increased pollution caused by the traffic has exacerbated this. How will increased pollution levels be monitored and managed? Is it appropriate that a nursery is part of this development with all its added pollution, noise and traffic?

4. The application includes predictions of up to 282 vehicle movements per hour for much of the weekend in a car park that will have 102 spaces. Just how will this work and how will the Arle Court roundabout cope with this? It is already extremely difficult to get onto the roundabout from the feeder roads at peak work times and now it seems there will be increased congestion at weekends as well.

5 The roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. The impact on existing housing and residents in terms of

access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.

6. Parking - there is already a big problem with parking along Hatherley Lane which made manoeuvring out of Wade Court difficult and dangerous. The very limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on the site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders like me. The proposed development is bound to generate more misuse of the car park.

7. The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed planning application is refused.

2 Fairhaven Park
The Reddings
Cheltenham
Gloucestershire
GL51 6RW

Comments: 14th June 2018

The previous objections from myself and daughter still stand regarding the proposal to build on the green belt site adjacent to North Road West and Grovefield Way. We wholeheartedly support the objection submitted by The Reddings Residents Association. It is not necessary to build anything on this green belt site. We have supermarkets, coffee shops, children's nurseries and offices nearby and do not need any more buildings. The proposed development will cause significant increases in pollution, noise, light erosion and traffic congestion which is severely detrimental to the local area and its residents. Trusting you will take ALL objections into consideration and reject this abhorrent proposal.

I most strongly want to object to the proposed development reference no. 18/01004/FUL.

Why is it that residents of Grovefield Way, The Reddings, North Road West and East and the surrounding areas were not informed sooner of the proposal to build a hideous development on a large area of GREEN BELT? The GREEN BELT must be protected from development. Importantly, the trees and hedgerows on the proposed site provide a habitat for wildlife and it is vital this is not destroyed.

In this area we have plenty of supermarkets, plenty of places to have coffee, adequate nurseries, empty office buildings by the side of Asda, also numerous empty offices in Cheltenham. In addition there are many brownfield sites that could be used. There is absolutely no need for this development and to destroy a community for quick financial gain.

Another severe problem is the volume of traffic this disaster will bring into the area. Congestion at the moment is unacceptable at peak time along Grovefield Way and the surrounding area. With all the proposed buildings there will be constant movement of traffic, loading/unloading at all times of the day/night. This is adjacent to residential properties and will negatively impact the lives of residents with noise and light disturbance and pollution. This is totally unacceptable. This

area is semi-rural and we want it to stay that way. We do not want our beautiful land destroyed and replaced with concrete, cars, noise and pollution.

I hope Cheltenham Borough Council will listen to the resident's objections because this proposed development should NEVER go ahead.

Comments: 7th October 2018

Myself and my daughter are writing to object in the most strongest terms to the revised planning application 18/01004/FUL. We have commented previously and our objections still stand. We support wholeheartedly and reiterate the concerns and objections raised by The Reddings Residents Association.

22 Egdon Crescent
Cheltenham
Gloucestershire
GL51 6GF

Comments: 23rd September 2018

This whole development is unnecessary as I outlined in my previous objection, and nothing in this resubmission improves the traffic chaos that will result on the immediate road infrastructure created by this development. The plans show in excess of 640 car parking spaces, the majority of which I would expect will end up being used by occupants of the office blocks and therefore will result in an uneven distribution of traffic during the day. Grovefield road to the Arle Court roundabout via the Park and Ride roundabout is already congested in the morning and evening with just the BMW site in operation, causing traffic to back up towards Cold Pool Lane; it could not possibly handle the additional traffic from this development. I note that the traffic survey was carried out in July 2016; I suggest it would be appropriate to commission a further survey to measure current traffic patterns.

3 Kemble Grove
Cheltenham
Gloucestershire
GL51 6TX

Comments: 13th June 2018

As nearby residents of the proposed new (additional) developments, we remain vehemently opposed to this planning application.

Those that have commented previously have articulated very clearly and rationally our concerns so we will spare you any further duplication.

However, as parents of a young family who chose to purchase a home in this area, it's distance away from such developments was a contributing factor to us making this choice in the first place. We find it abhorrent that so shortly after the completion of work of the BMW showroom that we are now faced with the prospect of additional and in our humble opinion, unnecessary commercial properties and all that would undoubtedly accompany them.

Finally, having been fortunate to have been able to utilise the services of the existing and fantastic Reddings Playgroup, we certainly echo those concerns around it's longevity and that of the Reddings Community Centre too - should this come to pass.

3 Barrington Mews
Barrington Avenue
The Reddings Cheltenham
Gloucestershire
GL51 6TZ

Comments: 11th June 2018

I object to the above Planning Application. The traffic situation is bad enough at the moment. Your proposed plan will only make it worse. We do not need Costa or a Nursery School .We have both available within 1 mile .Office space you have empty at many locations in Cheltenham. Your plan will increase Noise / Traffic Congestion / Pollution and spoil the environment . Reject the Plan

Chapel House
Old Reddings Road
Cheltenham
Gloucestershire
GL51 6SA

Comments: 11th June 2018

I object very strongly to this proposal. Just with having Asda and B & Q, the traffic is already heavy in the mornings and evenings. we don't need another supermarket, coffee shop or a nursery in the Reddings area. Pollution is already at it's highest and with more cars and public transportation, I dread to think what this will do to the environment. As owning a day nursery already, there is no need to have another one in the area. It will be detrimental to me and the reddings playgroup and the support I have had from the parents of my nursery speaks volumes. The majority of them live in the surrounding area and from the petition that was signed by so many of them all feel the same way and that this is an environmental issue that is unnecessary. I hope the people's voice of the reddings will be listened to and not dismissed.

Comment submitted date: Wed 04 Jan 2017

I feel the need as a small business in the Reddings to strongly object to the proposal of a nursery on this green belt area. I own a nursery myself and I know that a nursery that close to the bypass will incur such fumes that will be dangerous for small vulnerable children to breathe in. They would of course need a regulated amount of time outdoors. The amount of traffic that will flow due to a supermarket and a coffee shop will be extremely dangerous and high risk to children coming and going to the premises and there is no footpath which could be made safe, with an intended large volume of traffic.

I also feel that having another nursery so close to my nursery will be detrimental to my business. It will have an impact on my intake of children and if childcare numbers are reduced then staff will be vulnerable and may loose their jobs. This is a business I have built up for 18 years and I am strongly concerned about the impact a 72 place nursery will have on my business. i have worked hard to gain up a trust within the community and we are well liked and respected. We respect the environment and have a travel plan where we encourage families to walk or car share which I think will be difficult to implement where the proposed application is planned for. I am asking for you to please help keep my small business thriving and let some wonderful professionals stay in employment.

The Hedgerows
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 14th June 2018

I strongly object to this proposal, which I see as the latest phase in a carefully fashioned and executed attack on the Greenbelt. An attack designed solely to satisfy the developer's own requirements, without the slightest regard for what is appropriate for the site, for the local area or for the town.

Before the developer's involvement, both this and the adjoining site (since developed and now occupied by the BMW building) were supposedly protected from development by their Greenbelt status. Despite this, in 2007 the developer was granted planning permission on appeal for low-rise, low-key B1 business use on both sites.

In the Appeal Decision the Planning Inspector acknowledged that development of any kind on Greenbelt land was inappropriate, but that there was an overriding need in the case of this site to make land available for development to facilitate permanent employment opportunities for the benefit of the town.

The Planning Inspector's decision placed great emphasis on the value of the Greenbelt and the importance of protecting it against inappropriate development, which clearly implied a strong imperative to maximise the number of permanent employment opportunities created, within the constraints of the low-rise, low-key B1 business use scheme for which permission was granted.

Once the principle of developing on this piece of the Greenbelt had been established the key pre-conditions (ie to facilitate good permanent employment opportunities, whilst respecting the site and its surroundings) were conveniently forgotten and a significant part of that land (The BMW Site) was subsequently developed, in the form of a high-rise, high-viz car and motorbike dealership, without any net gain in permanent employment opportunities and we are now being asked to accept the current developer's proposal for what remains of the original site, comprising largely retail and other none B1 business uses, the effect of which would be a substantial reduction in the potential number (and quality) of permanent employment opportunities when compared with development exclusively for B1 business use.

So what has happened since 2007 to justify the use of this land for anything other than B1 business use? Has the demand for B1 business use been satisfied? Where is the evidence of B1 business use development in and around Cheltenham? All I see is retail, housing and retirement home developments.

In 2007 there was no overriding need to release land for further retail use in this part of town (otherwise the developer would have included retail in its original application). And today this remains the case, with generous provision of supermarkets, cafes and children's nurseries adequately serving this area of the town.

If the land was released from protection by the Greenbelt to satisfy a demand for B1 business use development and if that demand remains, then it should be put to that use for the benefit of the town and not to some other use dictated to us by a developer to satisfy its own ends.

I strongly urge you to reject this proposal.

Comments: 1st October 2018

My reasons for objecting to the previous proposal are essentially unchanged by the minor amendments featured in the current proposal, which I also urge you to reject.

The removal of the Costa Drive-Through and its replacement with additional B1 use would appear to be just a minor temporary concession, which the developers would, no doubt, seek to reverse if the principle of 'B1 use only' is conceded by the approval of this proposal.

It is important to reiterate that the protection against inappropriate development afforded to this site by its presence within the Greenbelt was removed on appeal specifically for the purpose of

satisfying a demonstrable need for B1 business accommodation, to generate high quality, sustainable, employment opportunities, for the benefit of the town.

It was not made available for any other purpose and there is no demonstrable need for the additional use classes proposed by the developer for this site - all of which are more than adequately provided for in this location.

Allowing this proposal would undoubtedly diminish the site's potential to benefit the town economically in the medium/longer term and therefore I strongly urge you to reject it.

2 Barrington Mews
Barrington Avenue
The Reddings Cheltenham
Gloucestershire
GL51 6TZ

Comments: 11th June 2018

We still object to this planning application for the same reasons as before, as there is very little change to the application, which was rejected by the council.

Our main objections are:

- 1) Increase in noise and volume of traffic (current road infrastructure unable to cope with traffic and there is grid lock at peak times around B&Q and Arle Court roundabouts).
- 2) Light pollution from proposed retail buildings.
- 3) Increase in flooding problems in North Road West.
- 4) Even larger volumes of litter (as can be seen since the opening of KFC).

As far as we are concerned there is no need for an additional supermarket, nursery and coffee shop in the Reddings area.

We understand that the area is no longer deemed as green belt, therefore the original plans for office buildings which was approved is the more preferable option.

Niamey
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RA

Comments: 12th June 2018

We wish to object once again in the strongest possible terms to the "revised" planning application.

Nothing has changed in that there is still no need for yet another Supermarket in the area. We are well served by Asda and Morrisons.

There is still no need for yet another Coffee outlet in the area. There is a coffee shop within both previously mentioned Supermarkets.

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Traffic and pollution on Grovefield Way and Hatherley Lane is already at saturation point at certain times of the day.

Who on earth would wish to send their children to a Nursery in this particular situation. Very close to the very busy A40, Grovefield Way and a Park & Ride - certainly wouldn't want a child of mine playing outside in that environment.

We absolutely support all the comments made by our local Reddings Residents Association.

Comments: 5th October 2018

Once again we wish to object in the strongest possible terms to the revised application. Whilst the removal of the Costa Coffee element is welcome, all the previous objections still stand - air pollution, traffic increase, environmental impact, unnecessary provision of yet another Supermarket in the area and all its attendant issues.

We wholeheartedly support the submissions on behalf of the local residents made by the very capable Residents Association who have expressed most succinctly all our objections and would urge the Planning Committee to refuse the latest application.

Woodlands, Badgeworth
Badgeworth
Cheltenham
GL51 4UL

Comments: 23rd September 2018

I would like to object to the planning proposal for several reasons:

It will significantly impact upon traffic issues already present in that area. There are already long tailbacks at pressure times in the area around the BMW garage. Whilst cars are stuck in a traffic jam with engines idling there will be a significant build-up of fumes in the vicinity making it especially unsuitable for a day nursery and the residents in that area.

There are several perfectly good supermarkets and a bargain shop already in the area. Why would we need another that could jeopardise current jobs?

Surely there are brownfield sites that would be suitable?. This contributes to the urban sprawl that we are seeing around Cheltenham impacting upon traffic and pollution and general aesthetics. The BMW garage is a prime example of a hideous monolith on our green belt that was allowed to be built despite objections by nearby residents. I do hope that this proposal will be most definitely rejected.

62 Greatfield Lane
Up Hatherley
Cheltenham
Gloucestershire
GL51 3QU

Comments: 4th June 2018

Letter attached.

Comments: 5th October 2018

Letter attached.

7 The Grange
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 11th June 2018

We fully agree with the objections to this proposal raised again by The Reddings Residents Association. All of the objections to the previous application are still valid i.e. There is no call for yet another coffee shop in Cheltenham or for a nursery, there is even less justification for a Supermarket.

It's time that the whole planning system was revised. Allowing developers to re-submit proposals with the intention of wearing down objectors which is what appears to be happening in this and other cases is completely unacceptable. It would also appear that developers who have sufficient funds will always get what they want.

Comments: 9th October 2018

We would like to add our objections again to those which have already been made.

It has never been explained how the BMW development was permitted on this greenfield site (or how it is that BMW employees now have to park in surrounding roads and on the verges of Grovefield Way).

Further development of this site is unacceptable for the reasons which have already been made, increased level of traffic when Grovefield way is now at a standstill at peak times, increased levels of noise, air and light pollution. There is absolutely no need for yet another supermarket in the locality let alone a 'coffee shop'.

I question what has happened to the democratic process when despite numerous objection developers are able to re-submit applications for as many times as they like with it seems the object of wearing down the many local objectors,

7 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 14th June 2018

We agree with all the objections made, there will be no greenbelts left and the wildlife will suffer. We truly hope this application will be rejected.

30 Redgrove Park
Cheltenham
Gloucestershire
GL51 6QY

Comments: 4th October 2018

I live in Redgrove Park. There is a lot of traffic coming from B&Q, Asda and the hospital which makes it difficult to get onto the roundabout on Hatherley Lane. It will be even more difficult with more cars coming from that direction into town, especially first thing in the morning if there is traffic to the proposed nursery as well as all the school traffic.

12 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 13th June 2018

I wish to strongly object to the above planning proposal at the land at North Road West and Grovesfield Way.

There are many houses that will overlook the site, which will cause noise, air and light pollution which I don't feel has been properly researched.

Since BMW was built we have significantly more cars being parked on North Road West/East, Reddings Road and Hatherley Lane. We do not have the infrastructure for this. North Road East is a very narrow road and I have no doubt will be used as a rat run to this site from Gloucester, Shurdington and Churchdown.

The Traffic and congestion on Grovesfield Way is already bad in peak times. The new site will cause even more congestion and therefore noise and pollution to the surrounding houses. The B&Q roundabout is currently a free for all and hence very dangerous. The new site is going to make this even worse at all times of the day.

I understand permission was given for Green belt Land to be released for offices, which is only a small part of this development. Which is unacceptable.

Finally we have plenty of places locally to obtain coffee and food. Asda, B&Q car park and Homebargains. So I see no need for an Aldi or Costa Coffee in this area.

I also understand that this land has suffered from flooding since BMW was built. The new development will make this situation worse, which will significantly effect the houses and roads in the surrounding area.

I cannot see how this planning application will benefit the local community in any way and strongly object to it.

9 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 11th June 2018

This development will increase traffic in the area which is already at saturation during the morning and evening,

Green belt will be destroyed.

Parking will a massive problem for all the potential new workers with literally nowhere for them to park as the P&R is already at capacity from the other businesses in the area not providing enough parking for their employees.

This will turn the area into a massive traffic jam!

Comments: 3rd October 2018

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Apart from a minor change, which is the omission of the Costa Coffee Drive through. The scheme is essentially the same as that described in submission 16/02208/FUL which was refused permission by the Council Planning Committee in December 2017.

Again I wish to strongly object to this proposed development on the following grounds:

- 1) The traffic at peak times adjacent to the BMW development is already stationary /gridlocked. Therefore the road infrastructure in this area is NOT able to take further development.
- 2) We already have Morrison's, ASDA, Home Bargains, Spar and a local store/Newsagent in our area. Therefore there is NO requirement/need for additional supermarket this side of Cheltenham!
- 3) The supposed employment benefits of the ALDI supermarket will be negated by reduction in both revenue and staff at nearby supermarkets, Morrisons and ASDA.
- 4) CBC should be acting strongly to encourage shops to move into the town center and move away from out of town stores. Otherwise Cheltenham will get more and more boarded up shops and not be a desirable place to live.
- 5) If this development is allowed to proceed there will be significant further noise and pollution impact to this area of Cheltenham.
- 6) The drainage issue on North Road West caused by the development of the BMW site has yet to be addressed. Any future development will exacerbate the problem and therefore this needs to be resolved before any development is even considered.
- 7) This should be green-belt land! It was crazy to allow BMW to be built there. The land was designated green belt for reason, to stop this kind of development that causes traffic and pollution problems
- 8) There will be much wildlife destroyed if the greenbelt is developed.

Flowerdale House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 13th June 2018

We objected to the previous application for the supermarket, drive through coffee store, children's nursery, etc in some detail.

The website seems to be unavailable at the moment so we can't specifically comment on the latest application. So we trust submitting this email will be appropriate.

The new application appears to be no different to the previous one apart from a few tweaks and smacks of a cynical attempt to wear down opposition to these proposals.

We wrote in length on the original application and are writing to confirm that those objections also now apply to this application.

Furthermore, we now add that there have been breaches of the planning for the Cotswold BMW site which haven't been enforced (barriers, use of the adjoining site as a building yard, breaches to the traffic management plan, unloading of vehicles on the public highway and inconsiderate parking).

Furthermore the park and ride facility is being taken over by BMW (and GCHQ) employees to the detriment of the Local community and Cheltenham Town Centre.

We strongly urge you to reject this further planning application.

Rozel
The Reddings
Cheltenham
Gloucestershire
GL51 6PR

Comments: 12th June 2018

The road infrastructure can not cope, you keep allowing businesses building on green belt land, without thinking about the locals.

The roads have not been improved and you have added an ASDA, allowed BMW to build on green belt land and ruin the night sky with too many lights on late at night.

SORT OUT THE TRAFFIC FLOW AND ROAD DESIGN BEFORE THINKING ABOUT BUILDING MORE AND MORE BUSINESSES THAT HAVE NO PARKING FOR THEIR STAFF.

11 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 28th May 2018

Why do we need another shop, driv-thru coffee shop and a nursery, already have these facilities close by. The traffic on Grovefield way is already heavy at peak times, trying to get out of the Reddings is a nightmare. The near by park and ride is a joke, glorified car park for workers near by who do not pay for use of. This land was allocated for offices, are we to have no greenbelt around the Reddings wich is quickly disappearing.

14 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 12th June 2018

I object because of the following.

Noise and disturbance from the proposed development.

Increase in traffic, It is bad enough now on roads which are gridlocked at peak times.

Pollution by transport.

Visual impact on what is a greenfield site.

Destruction of hedgerows and habitat of wildlife.

Extremely sorry for homes nearby as privacy will be affected and bright lights 24 hours a day.

We do not need another supermarket, drive through coffee shop, nursery or office blocks because we are already well supported with this kind of business.

19 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 8th October 2018

I would just like my comments to be submitted before Oct 18th as both myself and my husband are against the development.

1. Not enough car parking available
2. Too much noise and extra traffic pollution as well as air and light pollution especially where pre-school children will be, up to 10 hours a day.
3. The whole area is an eyesore already and I feel it is detrimental to wildlife and native flora and insects.

We do not need another supermarket or coffee shop. All unnecessary. How many trees shrubs and plants will be decimated this time?

4. Traffic congestion is already a problem in this area and will only get worse with this development, deliveries etc. Will these be in the day causing more congestion or at night causing noise and fumes for nearby residents?
5. Also by concreting this valuable area we increase the risk of flooding as there is nowhere for the surface water to go anymore.

This only scratches the surface of what many residents feel on how our residential environment is being ruined by greedy inconsiderate conglomerates and planners.

Please note my opinion. Thank you.

31 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 12th June 2018

We objected to the original application and we feel the second application shows contempt for the opinion of the majority who do not wish this development to take place.

18 Haslette Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3RQ

Comments: 13th June 2018

I object to the use of greenbelt land for this unnecessary development on the following grounds:

- 1) Greenbelt land - The land is greenbelt and should not be developed. The new BMW Mini development is already a blot on the landscape. This proposal is creeping further into greenbelt and drastically changes the nature of the land outside the current "ring road" of Grovefield Way/Up Hatherley Way. If this empty field is built on, then the next will be between North Road West and The Reddings. There are plenty of brownfield sites around Cheltenham without needing to build here.
- 2) Traffic - This road is already a problem at rush hour, and the addition of more office space, coffee shop and supermarket will only make the situation worse.
- 3) Noise and light pollution - The BMW garage is far bigger than is suitable for this area and lights that have been erected outside cause issues for local residents. Further building work will be noisy and disruptive for this area. The new proposals for shops being open until 10 pm (Aldi) & 11pm (Costa) would add to the noise and light pollution that we are already suffering from with the building of the BMW garage.
- 4) Environment - The work already taken place has caused flooding issues for local residents. Concreting over more of the countryside will only exasperate this.
- 5) Unnecessary - The office space is unnecessary as there are plenty of unfilled offices in Cheltenham, including nearby to Asda. There would be even more if the prime town centre offices had not been converted to retirement homes. There are also similar facilities - Asda, Morrisons, Home Bargains, Co-op, Spar - in the local area which are more than adequate. One local Co-op has already closed due to competition from Asda. Another supermarket is unnecessary and would cause issues by taking away business from the existing shops. How many Costa coffee shops do we need in Cheltenham?
- 6) Already refused - This application has already been refused. What has changed in so short a time that the developers think so many local residents who objected previously might have changed their minds?

6 Kemble Grove
Cheltenham
Gloucestershire
GL51 6TX

Comments: 11th June 2018

I strongly object to this application on the following grounds:-

- 1) Erosion of the Green Belt: The area of the proposed development is a green belt area. Over the last 15-20 years there has been a steady and gradual reduction in the green belt as commercial properties have been built (e.g. Asda, B&Q, KFC, Park & Ride, BMW, etc). This needs to stop now to preserve the remaining green belt areas. Please take a stand for both now and the future.
- 2) Increase in traffic congestion: Grovefield way is unsuitable for the existing volume of traffic at peak times particularly since the opening of the new BMW dealership. Should the proposed development go ahead then the traffic congestion will become chronic, badly affecting the local residents and the flow of traffic through the area ... bearing in-mind that Grovefield way is meant to be a bypass road.
- 3) Parking in the local area: There will be an increase in parking in nearby roads from customers and employees of the new amenities. This has been proved by BMW staff not being allowed to

park onsite and thereby parking in nearby areas (e.g. on pavements) with subsequent risks to the health and safety of local residents.

3) Increase in Pollution; There will be an increase in noise and car fumes due to increase traffic in the area, unloading of delivery vehicles at potentially unsociable hours and traffic being stationary in queues

4) Unfounded Requirements; The need for an additional superstore, nursery and coffee shop are unfounded as they are already met by existing businesses in the area (e.g. Asda Superstore on Hatherley Lane).

Further, this planning proposal is very similar to the previous one that was submitted last year. I would expect to see a significant difference in the proposals in order for the planning permission to be considered by the council.

15 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 7th October 2018

My primary objection to the application is that traffic in the area surrounding the proposed location is already out of control. At certain times of the day there is 'gridlock' on the 'B&Q roundabout' & the 'Golden Valley roundabout'.

Adding an Aldi store to the proposed site would exacerbate the situation. I urge you to refuse the application.

I have other objections too but these have generally been covered by other people's comments already.

Fayrecroft
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RE

Comments: 29th May 2018

Here are my views on the latest Grovefield Site application, which I have put together after reading the supporting documents on the Cheltenham Borough Council website.

These supporting documents are the result of a huge amount of work and dedication by various professional bodies. As such my views are in no way meant to undermine the work of people who are experts in their chosen field.

Rather the report brings up questions that the "Ordinary Man on the Clapham Omnibus" or here "The Ordinary Man on the Arle Court Park and Ride" might raise. It is not perfect; it cannot be as I am not an expert in this area. I may have misread, missed out or misunderstood something and for this I apologise in advance.

It aims to stimulate discussion. Clearly this is a project of huge complexity and as such it is so easy to become completely swamped with the level of detail.

But when faced with such an enormous intellectual challenge it is often useful to take a mental step back, take a breather and say;

" Is there anything I have not thought of or missed out? Have I got it right?"

Introduction

I have been reading the latest Grovefield Way Hybrid application with interest. Undoubtedly a huge amount of work has been put in by the developers and their agents. But while the report is couched in very optimistic language, I do feel that it raises many questions that need to be carefully considered before any building takes place.

It is so easy to get swept along with enthusiasm, while a clear impartial view may be difficult to see when there is so much complexity involved. (There are 82 attachments on the Cheltenham Borough Council website accompanying this application. The developer's report alone runs to 108 pages.)

However, there is also the concept of buyer's remorse. Once any development has been completed, it cannot be undone. It is far better to consider the issues now, rather than when it is too late.

With this in mind, I have quoted key sections of the various reports with my comments.

Developer's Report

2,3 "The design approach allows the site to effectively integrate with the wider development of the area taking particular account of the adjacent BMW development now constructed."

The architecture of the BMW monochrome box should not set a precedent for the rest of the business park. If anything softer architecture should be used to offset the stark appearance of BMW.

Architecture does not need to be brutal to be impressive.

Consider the beautiful and sympathetic architecture of Endsleigh in Shurdington, which is set in an attractive garden. Here the soft pale pastel rendering perfectly complements the luxuriant green vegetation. This is good sympathetic architecture.

3.2 "The site is surrounded by a mix of residential, commercial and employment uses including Arle Court Park and Ride facility to the north east of the site, commercial development (including an ASDA Supermarket) to the east and residential development at the Reddings to the east and south east of the site. A new BMW Dealership to the north east of the site is now complete and fully operational".

While this is factually correct I feel it would add clarity to say that the whole of the undeveloped area faces residential properties on two sides. (The other two sides are BMW and the A40). So any new development will directly affect the existing residential properties.

4.4 "A range of different uses have been proposed in the scheme in order to add vitality and economic benefits as well as to cater for all ranges of business uses and to help encourage market interest for the proposed offices".

I can see how a coffee shop would encourage market interest in the offices. However a coffee shop could easily be located in one of the offices, as I believe is the case at GCHQ and also at Gloucester Royal Hospital.

A drive through coffee shop, which is open outside normal office hours, would encourage potentially bad driving habits (in my opinion drinking a hot liquid while driving is as hazardous as using a mobile phone) as well as leading to more litter.

(You only have to look at the KFC car park. Despite the valiant efforts of the KFC manager and staff, litter is everywhere as its customers are too lazy to put their rubbish in one of the many bins provided.)

The Aldi is totally unnecessary when you have a very well stocked Asda and Home Bargains across the road.

The nursery would threaten the viability of the highly regarded and well established Reddings Community Playgroup and the Foxcubs nursery.

5.10 "Total locally retained business rates are estimated at around £667,000 per annum, which will provide funding to safeguard and extend further local employment and services."

This is very commendable but only if it benefits The Reddings. I understand that £2.1m of Section 106 money was given by Asda and BMW, but do not know how this has benefitted The Reddings.

5.25 "The traffic attraction associated with the scheme is not considered to be material, as set out in Chapter 5, and therefore it is not considered that the development will lead to any significant impact".

The roads are already extremely congested during rush hours.

How can any new development with the boasted 1018 employees, together with any customers and parents visiting the site, not have an additional impact on the already creaking road system?

Also what will the impact of new traffic from the proposed Leckhampton school, Cheltenham Cyber Park and the Arle Court Nursing home have on the area?

5.27 "Regarding the overall sustainability of the site, it is concluded that this site is suitably located in an area that would provide the opportunity for staff, customers and visitors to walk or cycle from home and to use local public transport services. It is also concluded that the site has access to a good network of bus services, which will ensure that there is a genuine choice in modes of travel thereby reducing reliance on the private car".

Again very commendable, but how can we be sure that any employees and customers will actually use public transport, walk or cycle to the site? (I have yet to see any BMW employees cycle or use public transport ,apart from clogging up the Park and Ride for genuine users.)

Is it realistic that people will cycle or walk back from Aldi with their shopping?

The proposed coffee shop is a drive through outlet; not a bus, walking or cycling outlet.

Unless the parents will be working at the new offices or live very nearby, they will be driving to and from the nursery. If parents are working at the new offices, it is likely they will also drive to the site, which leads to the next point:

5.28 "A total of 154 car parking spaces will be provided for the Aldi, Day Nursery and Costa Coffee Drive Thru. A total of 222 car parking spaces will be provided for the two B1 Office buildings. This level of car parking is considered appropriate to serve the development proposals, and this was agreed with GCC as part of the previous submission".

The economic assessment proudly proclaims that 1018 new jobs will be created and yet there are only 376 car parking spaces. This means there will be 2.70 employees per car space. Is it realistic to believe that there will be universal car sharing on the site or that the remaining 642 employees will cycle, walk or use public transport?

Where will the retail customers and clients of the nursery park?

This may have been previously agreed with GCC, but things have moved on. The Park and Ride will have pay barriers which will stop people parking there free of charge and walking to their work.

Where will these people now park and where will any new employees park?

I would whole heartedly endorse any plan to discourage one occupancy car use, but I live in the real world. Unless the bus services are priced more attractively, then people will still continue to use their cars.

Any travel plans encouraging non car transport need to be rigidly monitored or they are meaningless. If they are not to be strictly monitored they should not be included as part of any conditions for planning permission being granted.

5.37 "It outlines Aldi's Trading Policy, its layout, parking and store equipment and notes that the Grovefield Way operation will serve a different catchment and perform a different, yet complementary role to Costa Coffee's operation in the town centre, which will continue to provide for the refreshment needs of workers based in the centre and visitors to Cheltenham".

Why is Costa Coffee mentioned when looking at Aldi? Is this a mistake? Should the word Aldi be replaced with the Drive Through Costa? If so, this is sloppy report writing!

5.42 "The proposed foodstore and coffee shop will meet both a consumer and operator need for new and improved facilities at a location ear-marked for future major commercial and housing in this "strategic growth area" for Cheltenham".

Why is a new food store needed when the car parks for both Asda and Morrisons are rarely full, indicating they have not reached full capacity? Also the new Lidl in Tewkesbury Road has not been taken into account.

A new store should only be justified once the existing facilities become overstretched.

If there are going to be further houses or development outside the immediate area, then surely a store should be situated in the area where they are going to be built? Otherwise this will create further unnecessary traffic in an already congested area.

Are we not in danger of succumbing to premature over ambitious retail expansion for the sake of it? This may look impressive on annual shareholder reports and in the Chief Executive's speech, but where the long term future sustainability is questionable.

One only has to remember Tesco's rapid over expansion followed by store closures, as well as Marks and Spencers' recent announcement to close 100 stores. The fall of BHS shows that even household names are not immune to failure.

Aldi is only expanding at the moment because the economy is stagnating (0.10% in the last quarter) and people are no longer embarrassed at shopping in a discount store.

One has to consider the success of Kwik Save in the 1990s during the recession. Shops were then closed when the economy expanded and shoppers returned to the quality retailers. The success of retailers is very linked to the stages of the economic cycle.

5.44 "Overall, the proposed foodstore and coffee shop will deliver up to 60 new full and part-time employment opportunities at an accessible location. This major benefit is addressed further in Section 5 of the Statement".

Is the creation of 60 new living/minimum wage jobs really a major benefit? I would think 60 high quality jobs would be a benefit. If you are looking for living/minimum wage jobs there are always plenty of vacancies in the care sector.

5.49 "There is no recorded evidence of public sewers flooding in the area of the site that would cause a flood risk to the development site".

No, but every time it rains North Road West floods and pot holes appear in the road with depressing frequency, despite being regularly patched up. The undeveloped area acted as soakaway for the A40. Flooding like this in North Road West never happened before BMW.

6.10 "This includes the application site, which has struggled to attract investors due to the rigid demands for B-class uses only".

I do not understand this. The existing area already has nurseries, access to many coffee outlets and a very large and well stocked Asda. Is the real reason is that there is no demand for offices?

If this argument was valid then the existing Pure Office would have 100% occupancy and the second office would have been built.

6.22 "Policy SD6 is requires development proposals to consider the landscape and visual sensitivity of the area in which they are to be located or which they may affect.

6.23 Policy SD7 considers the landscape and states that development will seek to protect landscape character for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being by: having regard to the local distinctiveness of different landscapes, protecting and enhancing landscape character, reducing visual impact and consider the sensitivity of the landscape.

6.45 Policy CP7 is concerned with the design of new development and essentially states that new development will only be permitted where it is of a high standard of architectural design".

These are very commendable planning policies.

But I fail to see how glass and white rendered boxes protect and enhance landscape character. Does this really conform to a high standard of architecture? Even the B&Q warehouse has some elegant curves on its roof and tapering side panels.

Again, the monochrome box of BMW should not be used as a precedent for the rest of the site. The BMW building is despised in the area and secondly what is the trend for modernism? I thought that went out with Corbusier.

6.26 "Policy SD14 seeks to protect and improve environmental quality and requires development not to create or exacerbate conditions that could impact on human health or cause health inequality".

Have the developers been near Grovefield Way during the rush hours?

The fumes are so thick they can be tasted. It is bad already; any further development will exacerbate the pollution.

A recent study has shown that pollution is the 4th biggest killer in modern society. A Swedish report published in the British Medical Journal showed a high correlation between pollution and the increase in mental health medication prescribed for children.

Councils around the country have already faced class actions where the level of pollution has led to health issues in the area.

6.43 "The supporting text to that policy sets out that 'compatible' means unlikely to cause harm to amenity by loss of privacy or disturbance from noise, smells, fumes, vibration, glare from artificial lights, hours of operation or travel patterns".

This is a great planning policy and this acts to protect the neighbours.

But the Aldi and Costa Coffee will be open outside normal working hours. While it could be argued that Asda is open outside normal working hours, its frontage is set back considerably from the road.

The new developments will directly face the residential properties opposite. Glare from artificial lights is already an issue with BMW.

The neighbours will therefore suffer harm to amenity by loss of privacy or disturbance from noise, smells, fumes, vibration, glare from artificial lights, hours of operation or travel patterns.

Apart from BMW, the site is currently a field. Any development will lead to the deterioration in the neighbours' quality of life.

7.17" The impact of the previous proposals upon neighbours have been fully assessed. The previous officer's report to the committee notes, that while the new, and now resubmitted, proposal is markedly different, it also concludes that "officers consider that the impact of the proposal on neighbour amenity would be acceptable" (para 6.6.11)

Yes, the officers may consider the impact on the neighbourhood amenity to be acceptable, but do the officers live here? 339 households in the area felt otherwise about the previous application.

Where is the plan markedly different? It is still a nursery, coffee shop, supermarket and some offices.

7.19 "The application proposals are also accompanied by Noise Assessment which sets out that there are already significant levels of traffic noise across the site from the A40 dual carriageway to the north and also from the M5 motorway to the west. It is concluded that the noise arising from activities at the development site will be below the existing ambient traffic noise levels, and it is therefore considered that the proposed development is unlikely to have any significant noise impact upon the dwellings located at North Road West and across Grovefield Way. The proposed uses would therefore not be incompatible from a noise pollution perspective and the additional criterion of Policy CP6 is therefore met".

I have lived in North Road East for 20 years and noise from the A40 has increased considerably since BMW ripped out hedging, which previously acted as an acoustic barrier. By artificially making the ambient noise louder is not a justification for the development. If anything acoustic hedging should be replaced.

While I am not an acoustic engineer I do wonder if the hard surfaces of BMW act as a giant sound board, which reflect sound?

7.20 "The TS concludes that the proposed development will be accessible by foot, by cycle and by local bus services".

Yes, but accessibility and actual use are two different things.

How can we be sure that the office employees will live locally or use the bus? For example, how many BMW employees actually walk, cycle or use public transport? I suspect many are employees from the three former sites that were closed and now drive to the site.

7.21 "The traffic associated with the proposed development is therefore not forecast to have a material impact on the operation and safety of the local highway network".

Yes, forecasting is a bit like predicting the weather. You can use the best available modelling techniques, but reality is often different.

When Asda and B&Q were proposed I queried the impact on traffic and was patronisingly told that I was not qualified to comment on traffic. I was told it would not be a problem. Now look at the congestion.

7.67" As set out in full within the accompanying Transport Assessment, the application proposals will not result in a material increase in vehicular trips associated with the proposed development, in comparison to the extant consent. It is therefore considered that the site access is suitable to serve the proposed development".

The extant planning permission was for offices that were never built. This was put forward 11 years ago and things have changed in the area since then.

7.89 "A noise assessment has been undertaken to evaluate the potential noise impact of the proposed plant and delivery programme at the closest existing residential receptors on North Road West and across Grovefield Way. It is considered that noise does not pose a material constraint to the operation of fixed plant items or deliveries taking place and predicted noise levels will be below existing ambient traffic noise levels. The scheme design has been carefully developed with nearby residential properties in mind".

I am glad that this has been considered. As I have highlighted previously ambient noise has increased substantially since BMW was built. This current level of increased noise should not be used a basis for further comparison.

However the noise of traffic, by its very nature, is dependent on the volume of vehicles passing. So will the refrigeration/condensing/freezer/fridge units of Aldi be turned off/down at night when there are fewer cars passing?

Furthermore noise from passing vehicles varies (The Doppler effect) whereas noise from a static refrigeration or air conditioning unit is constant.

7.37 "From the above, it is evident that there would be both short term and long term economic sustainability benefits in terms of employment generation. Importantly, there will be jobs created with this development which have so far not materialised at the application site".

This refers to the table showing the gross earnings of the employees in the hybrid site. While the figures look encouraging this only refers to the site itself.

There is only so much retail business in the area.

Unless business is attracted from outside the area (and hence increasing traffic and congestion) what impact will it have on local employees working at the existing shops such as Asda, Pets at Home, Home Bargains etc.?

There is no point creating new jobs to replace ones that have been lost.

Also jobs have not been created at the existing site, apart from BMW, because it is a field! (I would also query how many new jobs have actually been created at BMW, rather than the relocation of jobs previously from the closed other sites.)

7.62" Whilst the proposed development will be in a visible location the development affords the opportunity to enhance the approach to Cheltenham along the A40; in conjunction with the new

BMW flagship building and will further stimulate market interest for the proposed office development".

How will an Aldi, a Costa Coffee, some offices and a nursery enhance the approach to Cheltenham?

Cheltenham prides itself on being the most complete Regency town in Britain. The brown tourist signs on the motorway proclaim "Regency Cheltenham".

How disappointed will visitors be when the first thing they will see is a discounted supermarket, some bland offices and a multinational coffee shop?

You have also admitted you are struggling to find clients for the office development. (I have received an off the record verbal report that the existing Pure Office has an issue with tenant retention.)

7.67 "Furthermore, the implementation of the approved BMW dealership at the north east corner of the wider Grovefield Way site has materially altered the landscape character and appearance of the site since the 2007 appeal".

BMW has changed the landscape and character of the area. It has made it worse. I have yet to meet anyone in the area that has said something positive about it.

8.5 "The operational phase analysis in the accompanying Economic Report prepared by Hardisty Jones Associates shows the scheme will deliver employment capacity for 1,018 FTE gross direct posts generating incomes in excess of £34 million per annum".

The crude average wage for 1018 employees is £34,000. The average UK wage is around £27,000. This crude average, which includes the lower paid jobs of retail and nursery care, puts the wage at 26% above the UK average wage.

If you take out the lower paid jobs of Aldi, Costa and Happy Days of the 71 employees totalling £1.28m, this leaves the remaining wage costs of £32.72m between 947 office employees, which equates to an average of £34,500 each.

When the report freely admits they are struggling to attract office based clients, where are these high paid jobs coming from? (It is a shame that GCHQ are opening offices in Manchester - an opportunity lost for Cheltenham.)

9.5a "A range of different employment generating uses have therefore now been proposed at the site in order to encourage vitality and the stimulate market interest, particularly for the proposed offices".

Again if the Pure Offices, with Asda, with their coffee shop, next door and nurseries nearby, cannot get full occupancy, why will the new development be any different?

Planning notes

Policy EM2 states "the use is appropriate to the location and adds value to the local community and area".

What value is added for the local community when it is already very well served by the local supermarkets, nurseries and coffee outlets?

The new offices would add value if you could get full occupancy and highly paid jobs, but there does not appear to be the demand.

Retail Report

I have been reading the 51 page retail report and have looked at some of the comments. I do not wish to repeat anything already covered in the developer's report but wish to highlight areas of interest.

3.18 "On this basis, ALDI complements, rather than competes with, existing local traders and generates considerable propensity for linked trips and associated spin-off trade. Store opening hours are also more limited than traditional convenience shops/newsagents, which further limits direct competition with such outlets".

This looks good and yet the report goes onto say:

3.23" Weekday store opening hours of 8am-10pm, and Sunday opening times to enable general flexibility in choice of shopping (within Sunday trading laws)".

How can Aldi complement local traders when it will be open during these hours? Are we to expect local traders to benefit during weekday trading only if they are open before 8.00 am and after 10.00 pm?

Aldi will be directly competing with the smaller stores and Asda.

4.13 "In considering the location of retail development, developers and operators should demonstrate flexibility and realism in format, design, scale and car parking"

I have already commented on the insufficient car parking spaces on site for the employees - so will you have a situation where shoppers will compete with employees in the limited number of spaces? I understand there is an existing issue with employees parking in the B&Q car park.

4.23 "By providing a new Aldi store that is closer to local residents than Aldi's existing store at Tewkesbury Road and, indeed, several other out of centre stores elsewhere in Cheltenham, the proposal will assist in reducing shopping trips to a range of stores elsewhere, with associated sustainability benefits";

There is an Asda already in existence opposite the site which is close to local residents.

If you want to talk about sustainability don't create a new supermarket which will take business off other existing stores, which is shown in the economic table. This is contradictory to:

8.29 "Notwithstanding, none of these national multiples will experience any threat to their sustained vitality and viability".

10.50 table This table shows the amount of trade expected to be diverted from the two big local stores- £3.45m Asda and £2.87m Morrisons.

So you are taking £6.32m off the two established stores, where car parks are rarely full and shop staff numbers are reduced through the increase in self- service tills and shopping handsets.

Further capacity for Asda and Morrisons is already in existence through their home delivery service. Aldi is not needed.

Aldi HGV Tracking

The tracking drawing seems to show that HGVs will be turning directly onto the car parking area of the Happy Days nursery. If these heavy vehicles are operating during the opening hours of the nursery I feel this represents a serious hazard to child safety.

If operating outside these hours it will be noisy for local residents.

Already complaints have been sent to Asda about delivery lorries coming in unsociable hours.

While they may turn off their engines, the constant noise from their internal refrigeration units has kept local residents awake. This is despite the sound cushioning from the row of trees between the store and the local houses.

Acoustic report

The acoustic report mentions:

Delivery vehicle movements occur for less than a minute during arrival and departure of the vehicle and, consequently, there is no potential noise impact from this source for the majority of the day.

While the sound of the diesel unit will only be heard for a very short while and the engine will be turned off while stationary, what about the noise from the lorry's internal refrigeration unit ?

It also mentions the safety reversing alarm:

Manufacturer's data indicates that, for tonal alarms, the most common rating level is SWL 96-98dB. For white noise alarms, the common rating level is SWL 102dB*. It is assumed that the alarms will have a 1 second on/off cycle. The calculation assumes that the alarm will operate for 10 seconds as the vehicle reverses into the bay.

Although any such alarm will be of a very short duration, if it is triggered during an early morning/late night delivery will the local residents be cushioned from the noise or will the noise disturb their sleep? Or even worse wake babies? I know some residents in North Road West have very young children.

*As an illustration 100db is the same level as witnessing a jet aircraft taking off 305 metres away.

And:

Section 7 details the predicted noise impact from vehicle movements associated with the coffee shop and 'drive thru' and indicates that levels will be of the order of 10dB below the lowest daytime background at the nearest dwellings.

Yes I can appreciate this, but what about at night when the Costa will still be open and Aldi accepting deliveries? You need the lowest night time background noise levels here.

Travel Plan

The travel plan includes a statement from Happy Days nursery which says:

"By way of comparison with existing Happy Days sites of a similar size we are confident that 9 car parking spaces is sufficient for the new nursery. Transport methods used by Happy Days staff within existing sites include car, public transport, walking and cycling".

A couple of questions arise:

- a) Do the parents have specific times agreed to drop off and pick up their children to avoid cars bunching up, which would cause delays and frustration?
- b) Of the 9 allocated spaces how many would you see as being taken up by staff all day and therefore restricting available places for parents? I understand that there needs to be a minimum child/staff ratio dependent on the age of the child.

- c) What arrangements have you made to ensure that parents dropping off or picking up their children do not coincide their arrivals and departures with the HGV lorries delivering to Aldi?
- d) If the one of the aims of the nursery is to provide childcare for employees of the new offices won't the parents arrive at roughly the same time? I have not come across flexi time in the commercial sector for a very long time. The prospect of higher than average wage jobs will attract candidates from outside the immediate area. If this is the case parents, alongside other employees, will be arriving on site through the single site entrance in a very narrow time window. This could lead to on site congestion.

The travel plan Appendix A quotes some very detailed travel statistics, but the period relates from 9th -16 July 2016. How relevant are these figures when they are taken during the main holiday period?

The travel plan appendix F also quotes very detailed statistics from September and August 2016.

This is undoubtedly valuable information, but by its very nature is historic. I am also not sure how relevant it is as Appendix F does not seem to relate to Cheltenham, but other areas of the country.

Since then BMW has opened and there are plans for a new Leckhampton School, the Cheltenham Cyber Park and the Arle Court nursing home.

Corinthian Park Visual Pack

Two points

- a) Where are all the cars?
- b) The buildings are coated in bright white render and yet they will face the reconstituted Cotswold Stone residential properties opposite. This clashes horribly. Once again lessons can be learned from Endsleigh in Shurdington.

Proposed Aldi elevation

Here grey rendering is used as well as white rendering. I know the BMW

Comments: 11th June 2018

It is anticipated that sorting out the "Air Balloon" A417 traffic congestion will cost £500m.

Are we not in danger of sorting out one problem then creating another if the Grovefield Site is developed?

The road system around Arle Court and the surrounding area is already under considerable strain.

The level of pollution is so thick in rush hours it can be tasted.

Some councils in the UK have faced class actions for not controlling pollution.

I have already been shunted from behind on this roundabout.

It was only luck that prevented me from suffering a more serious injury.

It has taken 20 years for the "Air Balloon" problem to be properly addressed.

This must not happen again.

Comments: 15th June 2018

I have been looking at the latest proposal for the new offices next to the existing Pure Office and Asda reference 18/01180/FUL.

The developer's report has a very interesting paragraph:

"The site is in a highly sustainable location both in terms of being close to extensive local amenities, including the adjacent supermarket and in the broader context of Cheltenham".

The developer here has clearly recognised what all the local residents on this forum have identified and expressed with such clarity and intelligence, namely:

There are already enough supermarkets, coffee outlets and nurseries in the area.

While any offices providing well paid jobs should be welcomed, there is no logical, social or economic reason to build an Aldi, Costa Coffee or even a Happy Days nursery (especially in such a polluted area).

Comments: 20th June 2018

I have been speaking to some local residents about the proposed Aldi.

While some local residents have said the introduction of a new Aldi will provide further choice, should wider choice be available in a suburban/semi- rural area?

We may all want extra choice but there is an economic and social cost to choice. Here it could lead to job losses in the existing outlets, traffic congestion, pollution and inconsiderate parking.

(If extra services are needed in The Reddings then there are more important things that readily spring to mind, including a doctors' surgery where the appointment waiting time is less than four weeks.)

A wider range of retail choice is readily available in the town. This is the purpose of a town's retail centre.

Also is there such a radically different range of goods that Aldi can provide that Asda and Home Bargains cannot? Apart from a different label I doubt it.

I believe that some residents in Benhall have supported a new Aldi, but the difference in travelling distance from Benhall to the new Aldi compared to the recently expanded Aldi is around three quarters of a mile.

It seems self- indulgent to create a new outlet when the travel time is so similar and where the report actually predicts that trade will be diverted from the existing Aldi to the new Aldi.

To give permission to create a new supermarket in the area before Cheltenham's retail review has yet to be completed , seems at best premature, at worst folly.

Comments: 26th June 2018

I have been looking at table on the retail assessment which shows the anticipated trade which will be diverted to the new Aldi.

The table seems to suggest that total trade for the new Aldi is £11.47m , but this includes £1.6m diverted from the existing Aldi. For an effective analysis I feel this transfer of trade from the same company needs to be deducted.

The new total is £9.87m.

The new Aldi is predicted to divert £3.45m from Asda. So 35% of the new Aldi's business will be taken from an existing store which is situated across the road.

If you add £2.87m predicted to be diverted from Morrisons then the total of diverted trade becomes £6.32m. So 64% of Aldi's business will be diverted from 2 stores both within 5 minutes drive.

Any retail development will serve an existing surrounding area and food retailing spending is fairly consistent, compared to luxury goods or capital expenditure.

I feel this over provision of food retailers in one area will only dilute the amount of existing trade amongst the retailers present and not lead to any more jobs. Rather it can only lead to uncertainty and possible restructuring within the existing stores.

Aldi is not needed.

Furthermore, any provision for retailers on this site will only reduce the amount of available space for higher quality paid B1 jobs, for which there is extant planning permission.

The recent planning application by Robert Hichens for offices next to Pure seems to indicate a resurgence in the demand for quality offices.

If this is the case then it seems appropriate to develop offices, which would be in keeping with the Local Plan to create employment.

The question also arises that if Grovefield is not used for offices, where else in town is suitable?

Comments: 4th July 2018

Today the BBC have reported the death of a 9 year old girl, which for the first time has been directly linked to illegal levels of air pollution in the area, notably from nitrous dioxide.

My thoughts go out to her family on such a tragic and premature death. No family should ever have to suffer in this way.

At her age I nearly died from asthma. It was only the rapid arrival of an emergency ambulance, intravenous injections of adrenaline and the availability of an oxygen tent that I am here today.

It is a matter of urgency that an accurate traffic study with onsite pollution monitoring is carried out before even a single brick is laid.

To place anyone's health at risk due to a supermarket that is not needed and a drive thru coffee shop that will attract additional traffic up to 11.00 pm at night is simply wrong.

But to consider placing a pre school nursery at the centre of it, without such pollution monitoring, is nothing short of gross negligence.

Accurate monitoring must be done now to assess current levels of pollution and a calculation of future pollution must be taken into account, based on more accurate future traffic flows.

While we would all like to live in the developer's world where people cycle, walk or use public transport, we have to live in the current world. And that means, sadly, cars and lorries.

Comments: 20th September 2018

I continue to object to this application for the reasons I have stated in detail before.

In summarised form:

- a) Aldi - no need in view of existing supermarkets.
- b) Happy Days- will compromise existing businesses and is placed in a polluted area.
- c) Costa - no need for a drive through coffee shop. If you want a coffee shop for office workers this could be built inside one of the offices and only open during office hours.

I welcome the latest drawings that suggest the drive through Costa has been replaced by an office.

- d) Traffic and pollution - the existing road system cannot cope and additional traffic will only make pollution even worse than it is now.

There is now a report in the media linking traffic pollution to dementia, which adds to existing studies linking traffic pollution to ill health, especially amongst the young, elderly and vulnerable.

However ,I am not against building offices if it can be proved that they will attract high quality jobs.

In the existing applications there is no mention of potential clients interested in occupying the offices. Rather the applications appear to be based on a rather hazy "build it and they will come" premise.

This compares with the recent application to build an accommodation block at Gloucestershire Airport where the developers were keen to publicise the £50m contract, conditional on the block being built.

The latest drawings have the commercial names of Bloor Homes and Ridge shown on the buildings. (I do not recall this before - only Aldi and Costa were mentioned as having some kind of contractual agreement.)

Is there any contractual agreement with Bloor and Ridge to occupy the buildings?

If the developers were able to confirm that high quality jobs were definitely coming to the area, I am sure this part of the application would be looked on more favourably by the community.

Comments: 1st October 2018

While I welcome the removal of the drive through Costa Coffee from the revised Grovefield application, I still feel that the retention of Aldi is a mistake and will, over the longer term, neither benefit the local community or the company itself.

I feel that the supermarket's inclusion on Grovefield is a result of Aldi's current popularity in the consumer sector and its very ambitious store expansion programme.

At present Aldi is benefitting from a slowdown in the economy as shoppers search for bargains. Aldi has also developed a positive image and has managed to rid itself of any social stigma of being a discount store.

The company itself has confirmed its store expansion policy in its last published annual accounts, for the year ending 31 December 2016, as a way of increasing market share.

Both Aldi and Lidl are challenging the traditional dominance of Tesco, Asda, Sainsbury's and Morrison's. Hence this is the reason for Tesco's decision to open its own discount alternative: Jacks.

But how will a new Aldi benefit the community?

Let's look at two statements in the developer's report:

"The Aldi supermarket and nursery provide convenient and accessible facilities required day to day by people working in the adjacent offices. Being situated in close proximity to the office buildings means immediate links, connectivity and access to childcare and shopping services for those that work in the offices".

And:

"To deliver a sustainable development it is important to consider mixed use development where different uses are developed alongside each other. Mixed use developments provide easy access to services and facilities that can help to create vibrant and diverse places to work. They offer the opportunity to have an improved quality of life with convenient access to facilities, resulting in reduced commuting and congestion, and greater opportunities for social interaction".

These attractively worded standard statements are impressive and initially it would be difficult to argue against their sentiments.

However, they fail to acknowledge that there is an existing retail site across the road, which includes both Asda and Home Bargains. This was clearly recognised by Robert Hichens in their application for the new offices next to Asda.

Also how could the development reduce congestion when the existing road infrastructure cannot cope with existing traffic and where the traffic study is out of date and was carried out in a non-neutral month?

Needless to say, some members of the community have expressed a desire for choice. This is understandable.

But what additional choice will Aldi offer?

The original economic assessment report quotes:

"3.13 ALDI stores are modest-scale supermarkets, selling a deliberately restricted product range consisting of approximately 1,500 lines. This is limited in comparison with other grocery stores and supermarkets, which can carry anything between 2,500 and 40,000 product lines, with superstores often carrying up to 60,000 lines".

So can a "modest - scale supermarket" offer more choice when its business model is specifically aimed at a restricted range of products?

Or will it simply duplicate a smaller range of products already on offer in the local stores, including the existing Aldi sited just 2.6 miles away?

Are we in danger of promoting a new supermarket just so shoppers can buy the same products but with a different label?

I feel the new Aldi may also contravene local planning policy.

"Policy RT7 states that retail development outside of defined Shopping Areas will be permitted only where a need for the additional floor space has been demonstrated and the proposals individually or in conjunction with other completed and permitted retail development, would not

harm the vitality and viability of the town centre as a whole or of a district or neighbourhood centre".

Has the need for additional floor space been sufficiently demonstrated when the developer's own economic statistics confirm that 64% of Aldi's business will come from trade diverted from the existing Morrison's and Asda?

This seems to confirm that trade diversion will harm the vitality of the existing stores in the district.

We also need to ask if there was extra retail demand why was the Benhall convenience store shut? (It also sold a limited range of goods as a top up shop.)

Secondly, will the rapid expansion of Aldi stores really benefit the company over the long term?

Let's look at their most recently published annual accounts, as reported by the Fresh Product Journal on 27 March 2018:

"Aldi's UK profits fell for a third consecutive year in the year to 31 December 2016, down 17 per cent to £211.3m - this despite a 13.5 per cent jump in sales to £8.74bn. The retailer said half of this fall in profits had been caused by keeping down prices or cutting them, with the rest caused by investment in new stores and distribution centres in a bid for future growth."

The article goes on to say:

"According to Reuters, a senior director at one of the big four retailers said Aldi and Lidl's price position couldn't last. "The underlying brand equity proposition isn't actually there, it's just that they are giving it away below economic rational behaviour," the director is reported to have said".

Are we seeing history repeat itself?

Remember the very rapid expansion of Tesco stores in towns. This over capacity led to the subsequent closure of 43 stores nationwide.

Although sales or store expansion figures can look impressive, it is sustainable profitability that governs long term business success.

It is only through returning consistent sustainable profits that a company can reinvest for the future, make positive returns for its shareholders and provide competitive salaries for its employees.

We also need to look at the current stage of the economic cycle.

At present Britain's economic growth is probably around 2% below its long term average. Any economic uncertainty can lead to people search for bargains and be attracted to no frills shopping, as seen by the popularity of Kwik Save in recession of the 1990s.

Aldi may be perfectly pitched to the economic cycle at the moment but how long will it last? Once Britain's economy strengthens we may see a return to the traditional and more upmarket retailers.

So will the new Aldi benefit the community?

The answer is of course no.

There are more than adequate food retailers in the area and it seems to me that Aldi is only interested in the site as part of its very aggressive store expansion policy.

Is this policy right? Only time will tell.

But the economic and social arguments for having a new store in the Reddings are unconvincing.

Furthermore, as has been highlighted comprehensively by The Reddings Resident's Association, it may only:

- a) provide a possible additional 16 low paid jobs
- b) take revenue from existing stores which could threaten jobs or lead to restructuring
- c) lead to more traffic congestion, pollution and more parking issues
- d) make only a very marginal contribution to Cheltenham Borough Council's annual income

For those making a decision about a new Aldi, two questions should be asked:

"Is this new Aldi store really needed in the area?"

"Can we really support a new supermarket ahead of Cheltenham's Retail Review?"

If there is any doubt, then the sensible decision should be no.

Comments: 5th October 2018

The most frequently used argument to support having a supermarket on such a site is that it makes it more attractive for office workers.

While I have said before that I would have no objection to an in office convenience store for the site employees, open during office hours only, I feel that the suggested Aldi is disproportionately large.

Here, we need to refer back to the economic forecasts quoted in the first application that the trade diversion by Aldi from other stores would be £11.47m.

If we accept the total number of employees on the full site would be 1039, then we can calculate much each employee would have to spend each week if the Aldi was there purely to service the site employees' needs:

$£11.47m / 1039 / 52 = £212$ per week.

Of course it's totally unrealistic.

I don't know many people who do their main shop straight after work and even fewer who would want it sitting in the back of the car on a long commute way home.

So by its very existence, the Aldi will lead to more traffic congestion and pollution by attracting shoppers from outside the site.

Furthermore, as identified by The Reddings Resident's Association, the applicant's transport analysis predicts up to 282 vehicle arrivals and departures every hour for much of the weekend, all into a car park with a maximum of 102 car park spaces.

Where will these shoppers park?

Where will the cars go that cannot immediately get a parking space?

I feel the inclusion of Aldi on this site is more about the company's extremely ambitious expansion programme. Their website shows regional maps of the UK with detailed lists of the towns where they wish to build new stores, together with the following text:

"Our sustained growth means we are continually expanding our property portfolio to help achieve our ever-growing goals for 2022. We have ambitious acquisition and development plans beyond that and are looking to acquire sites that meet the following property criteria for our standard store format.

Site Requirements

We prefer to purchase freehold, town centre or edge of centre sites suitable for property development in towns with a population of 15,000 or more. We are willing to explore all opportunities including developer led schemes and existing or new retail units. Our yield profile is increasingly adding value to developments.

Your Fees

Typical agent fees are 1.5% of the purchase price (freehold) or 10% of the annual rent (leasehold) finder's fee*

Fees regarding the acquisition of portfolio purchases can be discussed and agreed from the outset.

*Acting as our agent on previously unknown sites".

Some financial commentators have commented on Aldi's very tight operating profit margin, which is only supported by their enormous purchasing power of stock in Europe.

But is this policy right when the outcome of Brexit is still so unclear?

Only time will tell if this policy is successful.

What is clear is that Aldi is not needed on this site.

Comments: 9th October 2018

I have been reviewing the Local Plan and Joint Core Strategy where there are some very valid clauses that relate to the Grovefield Site:

14.1 "The protection and enhancement of the environment is considered essential in helping to improve the health and wellbeing of Cheltenham. The wellbeing of the Borough's residents is a key consideration in all policy making and no less in the determination of planning applications".

Policy SL1

"Development will only be permitted where it would:

a) not cause unacceptable harm to the amenity of adjoining land users and living conditions in the locality".

14.4

"In assessing the impacts of a development including any potential harm, the Council will have regard to matters including loss of daylight; loss of outlook; loss of privacy; and potential disturbance from noise, smells, dust, fumes, vibration, glare from artificial lighting, hours of operation, and traffic / travel patterns".

14.8

"Major planning applications will need to be accompanied by a Health Impact Assessment in accordance with JCS policy SD14. The applicant will also be required to submit supporting information to demonstrate how the proposed development positively contributes to health and wellbeing and particularly the 10 principles of Active Design developed by Sport England and supported by Public Health England".

SD14 on JCS states:

Policy SD14: Health and Environmental Quality

1. "High-quality development should protect and seek to improve environmental quality. Development should not create or exacerbate conditions that could impact on human health or cause health inequality.
2. New development must:
 - i. Cause no unacceptable harm to local amenity including the amenity of neighbouring occupants
 - ii. Result in no unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values
 - iii. Result in no exposure to unacceptable risk from existing or potential sources of pollution. For example, by avoiding placing sensitive uses in locations where national or EU limit values are exceeded, or by incorporating acceptable mitigation measures into development
 - iv. Incorporate, as appropriate, the investigation and remediation of any land contamination within the site
 - v. Ensure that any risks associated with land instability are satisfactorily resolved
 - vi. Take into account the quality and versatility of any agricultural land affected by proposals, recognising that the best agricultural land is a finite resource
 - vii. Have regard to any areas of tranquillity that are identified in adopted or emerging district plans and neighbourhood plans
 - viii. Avoid any adverse impact from artificial light on intrinsically dark landscapes".

Anyone from The Reddings will testify that traffic is becoming very congested and , as has been said before, the pollution is so thick it can be tasted.

While I can see no economic or logical argument for having a new Aldi, would a new pre-school nursery be regarded as a "sensitive use"?

Surely an accurate independent pollution monitoring programme needs to be implemented before a single brick is laid for the nursery?

Not to do so could leave the Council vulnerable to criticism and possibly claims in the future.

I have not seen any references to a Health Impact Assessment anywhere in the applications.

We must take into consideration the possible health impact of this development, not only for the vulnerable pre school children, but everyone in the community.

1 Barrington Mews
Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TZ

Comments: 12th June 2018

I find it absurd that further planning be granted to continue the development of this greenbelt land. As I'm sure you are already aware, planning permission has already been declined for this type of development once by CBC and this application should serve as a means of righting the wrong that followed when this refusal was overturned. To allow the development of the greenbelt further through permitting the construction of any of the proposed commercial buildings would be irresponsible and a clear indication that the aim of CBC is to raise income over maintaining the quality of life the residents already enjoy.

I do not believe, nor do many of my fellow residents, that these commercial outlets will be provided for the benefit of the local community. As I am sure all are aware, the entire plot is owned by the Cotswold Motor Group (CMG) Ltd and it seems strikingly coincidental that commercial outlets (an ALDI store and a Costa Coffee), which are akin to their target demographic, are being proposed. It is my belief that this is entirely the intent to increase the footfall at the CMG facility along with maximising the return on their investment of purchasing the land. I would be astounded that CBC would put the commercial interests of this one benefactor over that of the thousands of residents that live nearby and will be affected by the increase in vehicular traffic along with the cascade issues of increased noise, reduction in air quality and increase in light pollution from the security needs of the site throughout the 24hr cycle.

It has been made clear by other residents whom also object to this development, all of which I support, that the area is already served exceptionally well by supermarkets and coffee outlets and no further benefit will be gained. There is an interesting contradiction in the documentation that has been submitted by the developer - one report stating that there will be minimal increase in traffic yet also another which makes it clear one of the benefits of the development is that people arriving into Cheltenham from the M5 along the A40 will see this new development. Surely this must imply that an increase in traffic is inevitable, as people whom hadn't originally intended to visit Corinthian Park are now drawn towards it.

The increase in traffic flow (which in itself is a contradiction with traffic sitting still most of the time on all approaches to the Arle Court roundabout and the Golden Valley roundabout) will only negatively impact journey times. As already stated by the CBC contributor to this planning application, the roads are already at 'saturation' and the addition of this development will only worsen what is already a problem that should be on CBC's agenda to tackle. I already, on my journey to work from the Reddings to the North of Cheltenham, take a route directly through the town to avoid the traffic on Grovefield Way and I have no doubt more people will do so if this application is granted.

The provision of car parking spaces at the CMG is already woefully inadequate. The CMG have already notified their existing staff via e-mail that there are not enough car parking spaces for all those transferring from their existing sites being amalgamated into this one and have already instructed them to find alternate parking arrangements. The view of the transport plan that employees and visitors will arrive by bus is also absurd. Why would anyone, even coming from Gloucester and assuming a 20 mile round trip, take a Stagecoach bus at the cost of a £5.90 day-saver (lowest cost for a return journey) that takes 45mins and results in a 0.25 mile walk at the other end (from the A40 to the proposed development) over a £2.00 car journey that takes less than half of that time. This plan is void of realism.

The Park and Ride facility is already filled with GCHQ and Ultra Electronics employee cars during the day and CBC has already admitted via enquiries not related to this planning proposal that there is a significant problem with employee's using the P&R for day car parking. It is also not difficult to assume that the car parking provisioned by this proposed development will be controlled in a manner like that on the B&Q car park, whereby a third party is employed to ensure that a 3hr time limit is adhered to and to issue fines for those overstaying. This will therefore provide no relief to any parking issues already being established by the CMG facility. The natural consequence is that not only will CMG employees use local streets to park but people wishing to avoid Grovefield Way and the new developments staff will use them as well. This was immediately observed when Ultra Electronics opened on the Arle Court, whereby parking restrictions had to be put in place on Hatherley lane to ensure that the road was kept clear as employees began parking on both sides of the road, making it impossible to see oncoming traffic on bends.

Consequently, I ask that this development be rejected on the grounds stated above and summarised here: Unacceptable increase in traffic, unacceptable increase in air and light pollution, unacceptable demand placed on existing road infrastructure to the surrounding area, unacceptable provision of parking, unacceptable and unrealistic traffic and transport plan,

unacceptable impact on the local environment and use of green belt land and finally but not by any means an implication of lesser impact - an unacceptable reduction on the quality of life of those Cheltenham residents that will have to put up with the day to day negative impact of this development.

Comments: 4th October 2018

I find it absurd that further planning be granted to continue the development of this greenbelt land. As I'm sure you are already aware, planning permission has already been declined for this type of development once by CBC and this application should serve as a means of righting the wrong that followed when this refusal was overturned. To allow the development of the greenbelt further through permitting the construction of any of the proposed commercial buildings would be irresponsible and a clear indication that the aim of CBC is to raise income over maintaining the quality of life the residents already enjoy.

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16 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 15th June 2018

Can I apologise for having to write an email to you all in order to convey my STRONG objection to the above Planning Application, but your CBC website crashes with a Server Error message any time I seek to log in or re-register in order to submit an Objection.

Now unfortunately I cannot but help think that the website crashing serves very nicely for those who are seeking approval of their Planning Application. I am not for an instant suggesting "foul play" is at work, but I am appealing to your sense of fair play that you either extend the period residents may object or at least remember the hundreds of residents who objected the first time around and most likely would object again if asked. Would you consider testing this by writing to each of them asking them whether they still object? I think you know as I know, that there has been so little if anything that has changed from the first Application that would change their minds.

The facts are that this Application if it proceeds will see massive disruption to local homeowners, increased pollution from increased traffic, a loss of yet more countryside and its wildlife and country lanes being swamped with traffic they were never designed for (particularly Hatherley Lane). Please do the right thing and reject this Application on behalf of all of us who value the little countryside we have left.

Comments: 8th October 2018

With regards the above planning application I am writing to plead with the Council to STOP taking up and destroying our green belt land by building yet more unnecessary shops and industrial buildings when our town centre is becoming a ghost town due to decentralised estates being allowed to grow on the perimeters of the town. What does this do to wildlife let alone the wellbeing of ourselves and our children when so much rural land is being transformed unnecessarily.

Tell Aldi's to take up one of numerous Restaurant premises in the High Street and do the same to any other Corporate who only wishes to establish new industrial areas because car parking is free and travel routes in and out are easy, whereas the Council make parking in the Town Centre expensive and have now decimated the travel routes by closing Boots Corner.

For goodness sake, can the Council stop profiteering and attend to revitalising our wonderful Town Centre instead of urbanising our gorgeous green belt on the outskirts - enough is surely enough with the monstrous BMW garage in Hatherley Lane when they were already well placed in Tewkesbury Road!!

Thank you,

25 Leyson Road
The Reddings
Cheltenham
Gloucestershire
GL51 6RX

Comments: 13th June 2018

Our main objection as previously is the huge increase in an already congested traffic situation. We don't think that another Supermarket is required and we understand that this will be the 12th Costa coffee in the Cheltenham area. There is also the obvious wildlife issues and pollution as we understand that the air quality in this area is already poor.

3 Fairhaven Park
The Reddings
Cheltenham
Gloucestershire
GL51 6RW

Comments: 8th October 2018

Letter attached.

Coppalex
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 11th June 2018

Previous objection still stands.

There remains no local need for any of the amenities under this application and it is frustrating that we once again have to state the obvious. We do not want or need another supermarket or drive through coffee shop and the location seems less than ideal for a nursery.

- Supermarket application -

We have two supermarkets locally with numerous local shops which will be further affected by the competition. The traffic to the BMW site has increased (increasing pollution) and the roads are not suitable for carrying the additional traffic that a supermarket will bring. The Retail and Planning Statement for this application (paragraph 3.12 under Aldi's Trading Policy) confirms that shopping at a supermarket (according to most shopping surveys) involves use of the private car. There is a very infrequent K bus service but the bus stop is being used as a parking space along with the farm gates by local workers who do not have enough on site parking. All the residential roads around the new BMW site are being used as on street parking for BMW staff and this situation will only be exacerbated by further development in the area.

- Drive through Costa Coffee -

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There is a café in Asda and you can also buy coffee from the KFC drive through. Driving whilst drinking hot drinks is not illegal however careless driving which can include eating and drinking behind the wheel carries a fine of £100 and three penalty points for those whose driving is affected. This type of behaviour is being encouraging with a drive through coffee shop. The litter from people carelessly disposing of food containers, single use cups and straws from KFC is appalling. Another drive through will bring more of the same.

The visual impact of this semi rural area will be further damaged with the area fast becoming a copy of the Tewkesbury Road.

Comments: 7th October 2018

Once again we reject this revised application. Whilst the removal of the Costa Coffee element is a positive step there are still many real concerns over this application.

There remains no requirement for an additional supermarket when we are well served by local shops including Springfield stores, Asda, Morrisons, Home Bargains and Spar.

We have concerns about where the additional car parking spaces for the proposed Aldi will be found when the applicants transport analysis predicts more cars on site at a given time than allocated parking spaces allows for. There are already issues with parking in North Road West and East, Grovefield Way and near the C3 church due to the lack of staff parking at BMW etc.

A new supermarket will cause additional noise, light and air pollution and this is of real concern to residents who border the proposed site.

There have also been issues with flooding since the creation of the BMW Flagship and this is likely to increase with any further development on the neighbouring site.

The proposed development will increase traffic flow which the current road infrastructure will not be able to support. Long queues of traffic can already be seen daily along Grovefield Way and the addition of a supermarket will only compound this issue.

We wholeheartedly support the submissions made by the very capable Residents Association who have expressed most succinctly all our objections and would urge the Planning Committee to refuse the latest application.

Foxstone House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 28th September 2018

The current road infrastructure around the area cannot support this significant development. The traffic at peak times is already intolerable and roads which are not suitable for heavy traffic are being used as 'rat-runs' to skirt around the main roads.

Car parking is a continual problem with cars being 'abandoned' in any available space along local roads and even in various spots along Grovefield Way. This proposed development would not only compound the parking issue but would increase the level of traffic 'weaving' around all the parked cars which inevitably creates an increased risk to local residents, especially children walking to and from schools/shops.

As there is plenty of supermarket provision and office space in the area already, there is no reason for this abuse of greenbelt land and this application should be rejected permanently.

7 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 12th June 2018

I object to the proposed development. The previous application was submitted and rejected before the BMW garage was operational - now it is open it has had a significant impact on parking in the neighbouring roads. North Road East now has more parked cars on it during daytime hours - this clears in the evening implying it is daytime workforce parking in the road - and as a driver you have to weave up the road due to parked cars. The park and ride is often near capacity yet the buses are almost empty (so it is not full of people using the park and ride bus) and B&Q now need to have a parking attendant in the car park monitoring people using their car park and then leaving the site on foot. If there is already not enough parking for BMW and other staff locally then the proposed development of offices/Costa/Aldi will only exacerbate the problem.

We already have 2 supermarkets (Asda extremely close and Morrisons only a mile away) and Home Bargains also selling household products/food/toiletries at a low price - there is no need for another supermarket.

There is certainly no requirement for office space when the development next to Asda/Pure Offices is not completed - for locals using the alleyway to Asda off North Road East we are met with boarded area of wasteland that is earmarked for offices and never been completed - one board has been on the floor for weeks leaving the area behind exposed and there is graffiti including swear words which is not pleasant when passing with young children. Yet here is an application to build more offices. During the day the Pure Offices parking is all over their pavements and once again insufficient parking.

As a resident who can see the BMW garage from our upstairs window I was amazed how lit up it is once it gets dark, you can't miss it! - if Aldi and Costa are built we will have trade from early morning to late evening 7 days a week and the light, noise and increased traffic that this will bring. Despite an overall increase in traffic and noise on Grovefield Way it does quieten down comparatively in the evening and at weekends - we do not welcome busy usage 7 days a week and for longer hours each day it what is primarily a residential area - if this development goes ahead we lose what little green space we have between us and the A40 and M5 and it will become more of a commercial/business area.

I agree with other comments that a nursery built within this environment is not providing the best environment for children.

This development is not aimed at providing facilities for local people (as there is no need for them locally) yet we are the ones who will lose green space and suffer due to traffic, parking issues, noise and increased light from businesses open past usual 'working' hours. I can only see that these proposals are for use by people using the A40 in/out of Cheltenham and strongly object to the impact it will have on local residents and current local businesses.

Comments: 24th September 2018

My previous comments and objections still stand.

There is no need for additional retail/supermarket facilities with Asda and Morrisons both close, as well as Home Bargains.

Since BMW opened cars are being parked in the surrounding roads and also alongside Grovefield Way (wherever there is a dropped kerb for a gate/field entrance or similar), the traffic has increased and the thought of adding to this is frightening. B&Q car park now has someone

sitting in a car there at busier times to ensure that the car park is not wrongly used, this can only be an indication of the parking problem.

Office developments are not needed when the area beside Asda remains undeveloped and boarded up - a local 'eye-sore' given the frequent graffiti and holes in the boards. Surely this space should be developed first.

The loss of green space - the original plan for office buildings of 2 storeys has been blown out the water with the BMW development and this proposal for some 3 storey buildings. Office development would mean Monday to Friday but if Aldi is allowed this will be longer opening hours, weekends and the onslaught of Christmas busy periods - not what the original proposals had at all in mind. As local residents we will have lost all green space between ourselves and the A40/M5 - and turn what is a residential area/suburb into one big mass of buildings /retail space. I cannot believe the placement of a nursery in the midst of this development is healthy for the children.

None of the nursery/drive through Costa/Aldi /office space are going to benefit local residents, or needed by us, yet we will pay the price for having this development on our doorstep and I strongly object to its proposal.

Iona
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 11th June 2018

I wish to object to the above planning application on the following grounds.

The new plan is only a cosmetic change from the application 16/02208/FUL which has already been rejected.

In accordance with Appendix 3 Employment Map 3 of the Cheltenham Plan, some of this land was given permission for employment use, the remainder was to remain designated green belt but this planning application covers all the land.

The destruction of the Green Belt should be stopped.

The access onto the proposed site is unsuitable: traffic turning onto the site from the direction of the B&Q roundabout will cause extra congestion on an already very busy road while waiting to turn across the traffic.

The traffic generated by this proposal will cause an increase in the number of vehicles using The Reddings as a cut through to access the site and also increase the traffic congestion on the roundabout adjacent to B&Q and the Arle Court roundabout.

There have already been several incidents involving impatient drivers crossing onto the wrong side of white road centerline heading for the Arle Court roundabout narrowly avoiding a head on collision with vehicles heading in the direction of B&Q.

Increase in traffic in this area will make this situation worse.

I believe the noise which will be created by the machinery and traffic will have a huge impact on the area, we are already suffering with reversing alarms on vehicles at unsociable hours from the existing ASDA and BMW sites.

The applicant states on the application form that there will be 376 car parking spaces 5 motor cycle and 106 cycle spaces for 1018 employees. This area already suffers with overflow parking

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problems from BMW, GCHQ and Ultra Electronics this will be exacerbated with the number of parking spaces quoted being insufficient for employees and visitors.

There is no need for another supermarket in this area as there are already 6 within a 2.5 mile radius of this site including an ALDI only 2.18 miles away.

There are 2 nursery facilities already existing locally 1 at the Community Centre and another at the end of Old Reddings Road.

There is a KFC fast food takeaway already in the area which produces large amounts of litter we don't need another.

We cannot stop the planning that has already been approved for this site but any additional applications should be rejected and the remaining small area of Green Belt protected.

Comments: 5th October 2018
Letter attached.

Hamilton
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 11th June 2018

I object to this for the same reason as the last set of plans, which were extremely similar. The points have been summarised very well by The Reddings Residents Association, and you may consider me raising the same concerns as they do around the local plan, the environment, the unreliable and incomplete traffic analysis, the economic impact, and everything else.

Comments: 25th September 2018

My previous objections still stand. No traffic planning, oversupply of office space, oversupply of supermarkets, loss of green space.

11 Holst Grove
Cheltenham
GL51 6GA

Comments: 4th June 2018

Since BMW development there has been an increase in traffic on Grovefield Way. Many vehicles exceed current speed limit of 40mph. Noise of traffic has increased, especially on railway bridge.

Springfield
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 17th June 2018

The previous objections raised by us are repeated in respect of the major issues with this application, which simply have not changed.

My analysis of the revised proposals is that nothing significant has changed at all, save for some minor aesthetic tweaks. If anything, the application is now more out of date and confused than it

was in December; something I didn't think possible. No account of the emerging JCS or Local Plan is taken within this application.

Many people I have spoken to hadn't realised they had to submit comment again, believing their original comments stood. I wonder how many more this applies to.

I can put the feelings of the The Reddings area no better than those submitted in The Reddings' Residents Association objection, and all 4 of us at Springfield wholeheartedly endorse and repeat that objection. .

I would like to commend everybody for taking the time and effort to comment in such detail; raising many intelligent and thought-provoking observations. The fact that the once-beautiful area has been ripped up to make way for a BMW garage, and potentially a drive-through coffee shop, supermarket etc., and leaving residents and road-users to deal with a nightmare traffic situation is making people very angry indeed.

The proposed site is, as has been commented before (and as is noted as a constraint on this application) still greenbelt. Clearly it is now far from what we all know to be such, (after all, the deer that used to be seen in that field have long since been run over), and it is a travesty that the land's destruction has been allowed. However, I wish to reiterate the fact that permission has ONLY been previously granted for B1, low-rise, appropriate development for a residential area. NOT retail. Retail is an entirely different ballgame. Unlike office space, it would be a 7 days per week operation and, in the case of the proposed Aldi, open until 10pm. The site will be open from 05.30am until 11.00pm. This is not conducive with this residential area and is massively intrusive. It also remains a live question as to whether the BMW development can be considered "appropriate development" given its visual intrusion. Indeed Jackie Fletcher (ex-Ward Counsellor and Planning Committee member) commented of the BMW building to the press that "we didn't realise it was going to be so big". She wasn't alone. Many were similarly appalled whilst witnessing the monster of a building arise from the site.

It has been interesting to note the comment made by another on the previous hybrid application on this site that BMW at their current site apparently emailed staff, warning of a shortage of parking at the new premises (i.e., Grovefield Way) and for staff to "make arrangements". Setting aside the claim by BMW that they would be creating new jobs, when it is clear they were just relocating their current operation, it is apparent they knew all along that there would be insufficient parking. It would seem they are not interested in how the community it has imposed itself upon is going to deal with a problem that is of their making. This, to my mind, brings into question the validity of the traffic and transport plans, both for their original application and for the proposed retail one. I note also that the Pavillion had previously been contacted by BMW staff asking to use their car park (which is a fair walk away). Ultimately, BMW staff now occupy 80 parking spaces at the Park and Ride, which is incongruous given the facility's intention to mitigate pollution. It is however causing local problems where genuine users of the Park and Ride cannot park, so they drive to town, or park on the roads. It is therefore not unreasonable to assume that roads immediately adjacent the proposed hybrid development would fill up very quickly with staff and overflow customer parking after negotiating what are already dangerous roads, with few crossings (none on the lethal Hatherley Lane area by the Nuffield). All of this is pertinent because, after seeing the council's inability to enforce the BMW travel plan, I have no confidence that they will enforce this one.

The bus 99 now calls at the Park and Ride which has caused significant increase in local traffic, and this is before the multi-storey car park is built on the site to help accommodate vehicles from the proposed West Cheltenham development. The whole area is becoming a car park!

In addition to significant levels of noise and light pollution and fumes, retail outlets would also encourage significant volumes of traffic in the area at peak times, holidays and at weekends. By its very nature, a Costa drive-through would produce more traffic. With regard to Happy Days, I'm not quite sure who would be happy to place their child in a nursery in the middle of a trading

estate (with all of the environmental, health-damaging issues associated with fumes etc), but any that did, would also arrive in the main, by car. All this at a time when there is so much publicity about air quality. Indeed only today it was reported that 278 deaths per year in Gloucestershire are attributable to poor air quality. To put tots in amongst this is frankly irresponsible.

There will also be an impact on local nurseries, childminders and playgroups as detailed by others. I also believe that once permission for retail is granted, it will set a precedent for the rest of this site and, equally worrying, neighbouring greenbelt. No commitment is given to building offices 3 and 4 which, I note, boast that they would be fitted out to accommodate any use - ideal for future retail applications. Clearly a retail park by stealth.

The fact that Costa would have an outdoor seating area will impact neighbours, as there will be potential for people to be sat outside until 10pm. Also, there will be alcohol sales in Aldi until that time, with the risk of anti-social behaviour; something that currently isn't an issue in that area.

There is no mention specifically of the Springfield Provisions store which has traded in The Reddings for many years. Presumably the shop is seen as irrelevant. It is however difficult to see how such a shop could compete with Aldi. The applicant's supporting documents gloss over this as they appear to believe that such shops won't be affected. This flies in the face of common sense. The impact assessment indicates that they appear content to strip £0.57million from "other" shops. I am sure CBC would not wish to have anything to do with forcing small shops such as Springfield Provisions out of business.

There doesn't seem to be any interest in nature anymore either, presumably because the site has already been ravaged. I and others have email GCER with sightings of wildlife in the area. The sight of another dead hedgehog adjacent the site recently confirms that wildlife is still using the site, albeit that they will be struggling.

The wholesale removal of so many mature trees purely to "show off" BMW has been very hard to observe and is a complete travesty. The removal of the ancient oak was a particularly sad day for the area. The site now appears very bare. Landscaping on the site is either dead/dying or a very long way of maturity.

The road layout into the site would be wholly inadequate were retail to be added to the mix, with a refuge for turning into the site for only a few vehicles. After witnessing the disruption to traffic caused by people trying to turn into Aldi in Tewkesbury I fear the worst. As it is motorists during rush hour perform three point turns to avoid the queue. Who will take responsibility for any accidents that will inevitably happen there? Given that the Route 41 of the National Cycle Network runs past the site, and down North Road West, an exponential rise in vehicle use in the area will deter many, many more cyclists. This at a time when so much money has been spent on the route further up the road. Are we a cycle-friendly area or not? Mixed messages.

I would like to reiterate that Grovefield Way was originally developed as a ring-road to alleviate traffic from The Reddings/Hatherley - this site would be a complete about-face on that original undertaking and would actually force traffic back into The Reddings and surrounding areas. The road's construction was considered essential many years ago, ie, BEFORE to the development of KFC, Travelodge, Redgrove, Home Bargains, Pets at Home, B&Q, Asda, Pure Offices, the Park and Ride, the new housing development. This is not progress.

I would point out that a subsequent reliance on traffic calming on the road called "The Reddings" (I refer specifically to the section between the two Reddings mini roundabouts and containing the Animal Hospital/Springfield Provisions and Leyson Road) will once again be strongly resisted. Whilst I cannot speak of other roads within The Reddings and surrounding areas, and must leave that to others to comment, this stretch of road is totally unsuited for ANY calming. Proposals were put forward in the past for cushions and double yellow lines on The Reddings which would have caused massive inconvenience to residents and consequently, a petition was raised and the proposals were dropped. The road in this section is too narrow, has staggered driveways and is

used half hourly by double decker buses (which Highways admitted they were unaware of until it was pointed out to them) which are a vital link for the elderly and infirm in the area. Any attempt to jeopardise this will cause uproar. Traffic calming to deal with the issues of this proposed site is not the answer; less traffic is.

Drainage problems have frequently arisen as a concern amongst objectors. Who will take responsibility for flooding in residents' properties if they suffer as a consequence of inadequate provision? Having detailed and thorough plans for the intentions of the drainage is crucial. Local properties are already flooding in that road. The road surface on North Road West is now in trouble following BMW developing the site. It has been patch repaired - unsuccessfully. Why should others be paying to put right something that BMW have caused with their development?

I wish to point out that it is now clear that residents of The Reddings and surrounding areas are absolutely at the end of their tether with how we are being treated and will no longer put up with it. It has been disappointing that we were given so little time to respond and I am confident that many, many more objections would be raised if more residents were contacted and more time was available.

I question the validity of the clearly partisan "expert reports" produced by the applicant and their agents, and believe that they should be treated with scepticism.

Planners now have the opportunity to reject this ridiculous proposal and right a terrible wrong that has been carried out in our community. They must show that they have the wishes of residents and the protection of our environment in the forefront of their minds. Allowing the dreadful BMW to be foisted on our community was a massive mistake - one that cannot be repeated with this application.

Rye Lodge
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 11th June 2018

I strongly object to the application for the following reasons:

1. There already two supermarkets nearby, both of which are rarely busy. Asda is a two minute walk from the proposed site, and Morrisons is approximately 1.5 miles away. In addition, the recently built Home Bargains (100 metres from the proposed site) already sells many of the products that you would expect to find in an Aldi store.
2. I cannot understand how there can be a need for additional commercial office space when much of the office space created at the Asda site remains unoccupied. There is already a section of this site boarded off for creating future office buildings, but no indication that building work will commence in the short or medium term. My concern is that, if the application is approved, the applicant will later announce that office space is not required after all, and will seek to turn the site into a retail park.
3. Parking in the area is already very busy, due in part to the fact that many GCHQ workers choose to park in nearby streets than pay to park on the GCHQ site. Also, there are not enough spaces for BMW staff, who have resorted to parking in local streets and in lay-byes along Grovefield Way. The changes to the Park and Ride are only going to make this worse. The number of additional parking spaces created on the proposed site appears to be significantly lower than the number of additional jobs created (which in itself seems highly unlikely), suggesting that the parking issue in surrounding roads is likely to become considerably worse.

4. Traffic along Grovefield Way is already very heavy each morning and evening. My wife drives from our home on North Road East to work every morning, and it frequently takes her more than half an hour to drive the few hundred metres from the roundabout on The Reddings to the roundabout next to B&Q. This has become considerably worse following the opening of the BMW showroom last year. The traffic data in the application is grossly out of date, and the more recent survey is unreliable.

5. The Reddings and Hatherley Lane have already become 'rat runs' every morning and evening, and traffic all along Hatherley Road towards the town centre is significantly heavier than it used to be. This is likely to become even worse if the application is approved.

6. In addition, the volume of traffic queuing to get into the Park and Ride site next to B&Q is often very busy, even at weekends, with queuing all along Grovefield Way.

7. It is very difficult to see how there can be a demand for a drive through Costa Coffee when there are plenty of shops nearby selling coffee. For example, the cafe at Asda sells cost, as does KFC across the road from the site. I understand that there are now 15 Costa Coffee shops in Cheltenham, so plenty already.

8. There is no need for a new nursery when there is already an excellent playgroup run at The Reddings Community Centre on North Road West. I understand that this playgroup already has vacancies.

9. I have concerns over the impact on air quality, particularly from the number of cars and lorries that will result if this application is approved. Areas of Cheltenham already breach Government pollution guidelines, and this application will only add to that. A drive-through Costa is clearly only going to add to pollution levels.

10. I am also concerned about the constant flow of water down North Road West, even on very hot days. The BMW showroom has clearly had a negative impact on the local water table, and has resulted in flooding of local properties.

11. Finally, there was widespread criticism of the design of the previous application (16/02208), yet the applicant seems to have largely ignored this. The designs are very poor, unattractive, and not appropriate for either the area or for the gateway into Cheltenham.

There seems to be a complete and deliberate disregard for the opinion of local residents. It is difficult to see how any of the proposals could benefit the local community.

Comments: 6th October 2018

I fully endorse all of the points raised by the Reddings Residents Association, and all of the objectives that I raised in my previous comment still stand. In particular, I strongly object to the application for the following reasons:

1. Traffic in our area has increased significantly in recent months. The recent work on the A40 out of Cheltenham seems to have encouraged a great number of drivers to use Hatherley Lane and The Reddings as rat-runs, even though the A40 is fully open again. Permitting this application is bound to make traffic worse than it already is. The roundabout by B&Q is extremely busy at peaks times, and the Arle Court roundabout is horrendous at most times of the day. Every morning and evening, traffic backs up along all roads leading to the Arle Court roundabout, with traffic on the A40 regularly backing up all the way to the M5. This application should not be considered until a solution to the existing problems has been found and implemented.

2. Inadequate car parking facilities are included in the proposals. We already have car parking all along our roads, cars park on verges and in laybys in the area, so where are all the additional cars going to go? Public services in this area are fairly poor, there are no cycle lanes from

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Gloucester so how else are people going to get here other than drive? I understand that 282 vehicles are predicted to arrive and leave every hour, yet there are just 102 parking spaces in the plans. How does that work?

3. We already have plenty of supermarkets and shops in the area. There is no need for another supermarket. The applicant's own figures seem to prove this, by stating that a large proportion of custom will come from the existing Asda and Morrison's supermarket, rather than being new custom. Asda and Morrison's are always quiet, and many manned tills have been replaced with self-checkouts because there aren't enough customers to justify additional checkout staff.

4. Additional childcare facilities are not required, when there are excellent facilities in the area already. Also, placing a nursery in the middle of office buildings, car parks, a supermarket and a car showroom, and right next to the M5 and A40 hardly seems sensible. Every day we hear about the terrible effects that pollution is having on our health, and young children should not be exposed to such high pollution.

5. The applicant's claims about the number of new jobs that will be created are fanciful, and disingenuous. We all know that, if the application is approved, the applicant will seek to amend the plans to reintroduce a Drive-through Costa and other unwanted facilities, significantly reducing the number of jobs created.

6. I am very concerned about the loss of natural habitat for birds and animals. The BWM showroom has already had a hugely damaging impact, and allowing this application to proceed would be devastating to the animals, birds and fauna that remain.

As a final comment, I find it unbelievable that local residents have had to comment three times on what is essentially the same application. The applicant clearly hopes that by making several applications, those that oppose the proposals will eventually give in. They are wrong. This is an inappropriate and unwanted application that, if approved, will cause terrible and irreparable damage to a quiet, residential area. It must be refused.

2 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 8th June 2018

Object - For all of the same reasons as previous objection to previous application. The area is so congested and busy already that it simply cannot cope with extra traffic and pollution. It is deteriorating the quality of life for Reddings residents.

6 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 11th June 2018

I object on the following grounds:

- 1) The increase in traffic on an already congested road
- 2) The increase in noise pollution
- 3) The fact that the Greenbelt land was specifically released for offices-not retail

6 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 7th June 2018

I am writing to you in regards to the planning proposal submitted adjacent to the Cotswold BMW showroom off of Grovefield Way.

I am very concerned about the increased traffic that is inevitable if an Aldi Supermarket and Costa Coffee outlet are built. Traffic on this road and the Asda roundabout is already extremely heavy, and pollution levels will only increase. With housing so close to this proposed development, increased traffic and pollution will make the area unsafe for us residents. Noise will also be a problem for residents, especially given the late opening times proposed for the Aldi store.

I therefore would like to submit these concerns and object the proposal.

Thank you for your time.

4 Bladon Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UJ

Comments: 27th September 2018

I would like to object to the planning proposal for several reasons:

I live directly opposite this site and have already had the joy of watching the BMW garage being built. This building surely serves as a warning at how a planning application can be passed but then changed to suit to the detriment of those living nearby. Has anyone noticed how this building looks like a boat at night when it's all lit up? The mini on top is like a cherry on top! I am therefore concerned as to the loss of visual amenity and the amount of light pollution any further development of this site will produce.

I have recently been on maternity leave and regularly see staff from the BMW parking on local roads such as North Road East and even on grass verges on Grovefield Way which are not designated car parking spaces. If this is a problem now, then there will be a more significant problem with parking with further buildings on this site.

I am concerned with highway safety and road access - I have already seen an increase in traffic in the area as result of the BMW garage so further buildings regardless of use will only compound this issue. The roundabout from the Reddings onto Grovefield Way is an accident waiting to happen due to poor visibility and speed of some vehicles that approach it.

The suggestion of having a nursery seems ludicrous - as a recent parent I would not consider sending my daughter there what with the nearby motorway and bypass, the amount of pollution in the air surely is a concern?

I am also concerned with the loss of nature habits and increase of noise pollution. I enjoy listening to the birds in the morning and can hear local buzzards in the sky so would be concerned that this could be effected or lost.

Finally I am concerned at the loss of trees that serve as both a screen against the site but also reduce noise from the nearby bypass and motorway. The BMW garage have already removed trees and killed those that they planted. Please do not build further on this site, there really is so much to loose and nothing to gain.

27 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 11th June 2018

I strongly object to this planning on these grounds.....

We do not need another supermarket in this area. We can walk to ASDA, or Home Bargains, in 5 mins, and even only 20 mins to Morrisons. This is especially relevant because ALDI already has a new expanded store not 10 minutes drive from here, on this side of Cheltenham.

We already have cases of employees from BMW parking in our roads because they do not have enough parking spaces. I know that PURE Offices near to ASDA were approached by BMW to pay to use their parking spaces, as BMW knew they did not have enough for their employees. As it is, PURE Offices does not have enough either. To this end, it seems obvious to me that each new development woefully underestimates the number of car spaces for employees. There is nothing to suggest that this development will be any different, and the result is our quiet residential parking and roads being over-run with excess cars.

Additionally, the P & R is overrun with GCHQ employees, who also do not have enough spaces, and an expansion of the P & R is desperately needed, especially as the council have increased parking charges so much in the town centre that it puts people off going in to town. Many people do not. This has been made worse by getting rid of the single line, free in the evening and on Sunday spaces. None of this helps where cars need to go and park each day.

A COSTA coffee, day nursery and some offices could easily be put on to the site next to ASDA, which is languishing in disrepair and unused.

All I see are estimates of employment rates, and rates income for the council, but no real alternatives for the residents. There is no real consideration for those who live here. If you want to improve the lives of people who live in Cheltenham, you should start to listen to their needs, not those of developers and businesses.

1 Tibberton Grove
The Reddings
Cheltenham
Gloucestershire
GL51 6UH

Comments: 20th September 2018

This development is inappropriate and unnecessary as it would be surplus to requirements. The office space already available is not fully let. The traffic pollution and volume at certain times of the day is high as is noise from this traffic. Coffee drive through would lead to littering.

2 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 18th June 2018

Letter attached.

Cheadlewood
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 9th October 2018

I strongly object to this application.

Greenbelt:

The status of the land is currently green belt which local residents cherish. There are no exceptional circumstances which need a change in current boundaries.

The BMW site continues to blight our lives with insufficient parking spaces meaning workers are filling up local streets; and greatly increased congestion on Grovefield Way. It should never have been approved. We don't want another debacle.

No need for this development:

There is no evidence of any need for any more supermarkets. We are already well-served by Asda, Morrisons, Coop and Tesco; and a number of smaller stores such as Home Bargains. Recently the Farm Shop on Grovefield Way closed; which points to there not being a need when the area is already well stocked with supermarkets. Why do we need another supermarket to compete with others that are within walking distance?

Noise Pollution:

With the BMW development we have already seen an increase in traffic noise. This has totally changed people's ability to relax in their gardens with the constant drone of traffic. Another large sprawling development would only make matters much, much worse. The applicant suggests 282 vehicles/hour at Aldi at evening and weekend. Between 09:00 to 20:00 on Saturday and Sunday that equates to an additional 6,200 vehicles; not counting weekdays. It would get such that it would be impossible to sit in one's garden anymore. This development would effectively prevent people from enjoying their outdoors.

Car Parking:

Residents on North Road East are still experiencing severe difficulties getting in and out of driveways due to BMW personnel parking opposite house entrances. This has led to a fractious situation and will get worse with the influx of employees and customers from another 3 developments.

Traffic:

There is absolutely no doubt that a supermarket would bring much increased traffic. Grovefield Way is already a congestion zone in the mornings. This would only make matters worse, causing drivers to divert down residential roads such as The Reddings or North Road West. Moreover, the increased traffic would be seen throughout the day and evening; especially since a supermarket is effectively a 24-hour operation.

Parking, traffic and noise are already very bad and will only become worse. I plead with you to side with YOUR public and completely reject this application.

The Pavilion
Hatherley Lane
Cheltenham
Gloucestershire
GL51 6PN

Comments: 13th June 2018

I am writing in my capacity as the minister of C3 Church which owns The Pavilion, Hatherley Lane.

This proposed development is causing a great deal of distress to those living and working in this area for very valid reasons which need to be heard.

The amount of traffic congestion in this area has increased dramatically in recent years and this proposal will make this worse along with the increased problems of street parking, air pollution and noise. The bottle neck of traffic trying to get on to the A40 during rush hour is already a difficulty. The loss of greenbelt land to accommodate unnecessary additional supermarkets, coffee shops and office space is unacceptable.

This plan seems to have been poorly put together based on inadequate data and an inappropriate use of green space, which should have been left as it was. The fact that local residents now have flooding problems to contend with suggests that no-one did their panning properly in the first place which gives no confidence that any further plans will be well thought out.

Please listen to what those who live here and know the area are saying and reject this proposal.

27 Chalford Avenue,
The Reddings
CHELTENHAM
GL51 6UF

Comments: 11th June 2018

I strongly object to this appeal in accordance with those comments made by The Reddings Residence Association. These are as follows:

- 1) To be clear, TRRA do not take issue with the B1 elements of the application nor the extant permission as a fall-back.
- 2) TRRA and the vast majority of the 1000 households that it represents, the ward councillors, neighbouring residents' associations, businesses and parish council have previously objected to the non-B class application. No comments in support of this application have been made to date.
- 3) As set out, we find a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF.
- 4) Some of the reports submitted are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.
- 5) The Local Plan is not yet finalised, and the Retail Plan is not written. This application is not consistent with either.
- 6) This proposal is contrary to the current retained Retail Plan.
- 7) The reports were drafted before the current editions of the Local Plan and JCS.

- 8) Objection reports were filed by other traffic and planning consultants in respect of the previous application. These refute many of the applicant's reports, conclusions and claims. The applicant reports in support of this application do not address them.
- 9) The traffic data is grossly out-of-date and the more recent survey is unreliable.
- 10) Air quality monitoring and objective, impartial assessment is required.
- 11) This proposal is very different to a B1-only proposal inasmuch as offices are likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day. Also, further light pollution from vehicle headlights shining into windows at all hours would occur.
- 12) Traffic was bad and is now very bad following the BMW being opened in August 2017. Traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted. This was a significant concern for the planning committee.
- 13) Acoustic background noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly compared to the extant B1 permission. The problem is compounded by the applicant having previously felled much of the tree and vegetation screening along the A40 and Grovefield Way to display their BMW building.
- 14) B1 is likely to create modal shift with local jobs for local residents. Conversely, retail will encourage journeys from out-of-town. As such, it is contrary to the NPPF.
- 15) If permitted, this will be the 15th Costa Coffee in Cheltenham. In this regard, the county is already a laughing stock. Costa will also encourage consumption of hot drinks whilst driving.
- 16) The applicant's projected full time B Class job numbers are misleading and use incorrect numbers.
- 17) The very special circumstances in 2007 were to permit the use of premier Greenbelt land for employment purposes with the creation of high value B1 jobs on a large site. The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs. This proposal will take a further 12% of the site for non-B Class development to create 71 associated new full time jobs. However, that will be at a cost of 132, or more B1 jobs that would be created on the same 2448sq meters of the site. As such, the loss of B1 jobs to the retail/childcare A and D class proposal will remove a potential £588,000 per annum from the local economy compared to the equivalent B1 employment wages that would be generated by the extant B1 permission.
- 18) Altering the site contours and stockpiling of soil during the BMW development has altered the historic ability of the site to absorb storm water run-off from Grovefield Way. This is causing flooding to local houses. The proposed development must account for this water in their designs, having already realigned the entrance road, and missing the chance to improve the highway drainage whilst doing so. A local spring has also changed course and is causing continuous damage to the adjoining highway "North Road West".
- 19) The nature of the application, with only outline permission requested for the majority of the B1 offices, means that neither CBC, nor residents can have confidence that the proposals placed before them are transparent or coherent, and that the applicant will not subsequently reapply to adjust the proposals once he has secured permission for A and D class development on the site, as he did for BMW.
- 20) The proposal is not appropriate development in the Greenbelt.
- 21) The development does not pass the sequential test because The Reddings area is not recognised in the policies retained in the Local Plan. The former BMW site on Tewkesbury Road (now a Lidl & Starbucks) is nearing completion. Do we need another supermarket or coffees shop? The large Wholefoods and Baileys sites are now vacant. Paragraph 27 of the NPPF clearly states that if the sequential test is failed, permission should be refused. The sequential test is undoubtedly failed. The applicant's comments retarding North Place are speculative.
- 22) It is clear from the applicant's own economic analysis that a combined loss of turnover to Morrisons, Asda and "other" local stores of £6.89m will occur. That represents existing jobs and shops in the local community that will be lost. £6.89m is 60% of the projected total turnover for the new Aldi. At best the job losses will be translated to equivalent jobs at Aldi. Statistically, however, it is fair to say that only 40% of the jobs projected for the proposed Aldi will be new jobs.

That said, as the whole economic analysis is based on trade diversion, the balance of new jobs at Aldi must also relate to jobs lost elsewhere in the county. This "trade off" will not occur if the applicant builds the B1 offices that he already has permission for.

23) The draft unilateral undertaking by the developer on the previous application does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.

24) There are so many flaws in this application that we are surprised that it has been brought forward for consideration, when the previous application identified that only some of the worst aspects of the initial application had been adjusted over the course of several amendments in 2017. The current application makes only minor cosmetic changes and still fails to properly address the concerns that were raised in the previous application.

We believe that our community, and Cheltenham, deserves the right solution in line with the visions of the emerging Local Plan. Precious Greenbelt has been sacrificed for this B class employment land site. For that to have happened just to make way for more coffee shops and supermarkets would be wrong and we find nothing to support the applicants advocacy for same in the facts of this matter.

We urge you to reject this application and thank you for your time and consideration of our submission.

The Reddings Residents' Association

69 Redgrove Park
Cheltenham
Gloucestershire
GL51 6QY

Comments: 6th October 2018

The revised proposal still includes the supermarket so everything I previously noted still applies. If we carry on like this with planning we will simply swallow up more and more land and have dead boarded up hearts to towns. There simply is no need for yet another supermarket this side of town, there is already too much traffic pulled across from Charlton Kings, Leckhampton etc. It will not create more jobs, there is a finite amount of food people buy. It is not clear whether the takeaway is still buried in the above description; an improvement if it has been removed.

6 Tylea Close
The Reddings
Cheltenham
Gloucestershire
GL51 6RB

Comments: 2nd October 2018

Apart from a minor change, which is the omission of the Costa Coffee Drive through. The scheme is essentially the same as that described in submission 16/02208/FUL which was refused permission by the Council Planning Committee in December 2017.

Although this small change is welcome it does not address the fundamental reasons why this planning was and should be rejected. Therefore again I wish to strongly object to this proposed development on the following grounds:

1) The existing planning allows for B1 and NOT A1 class

- 2) The traffic at peak times adjacent to the BMW development is already stationary /gridlocked. Therefore the road infrastructure in this area is NOT able to take further development.
- 3) We already have Morrison's, ASDA, Home Bargains, Spar and a local store/Newsagent in our area. Therefore there is NO requirement/need for additional supermarket this side of Cheltenham!
- 4) The supposed employment benefits of the ALDI supermarket will be negated by reduction in both revenue and staff at nearby supermarkets, Morrisons and ASDA. These jobs will probably be low pay, which is in contrast to the potential high pay jobs if the original planning consent for B1 office space is adhered.
- 4) CBC should be acting strongly to encourage shops to move into the town centre and move away from out of town stores. Otherwise Cheltenham will become like other towns full of boarded up shop fronts.
- 5) If this development is allowed to proceed there will be significant further noise and pollution impact to this area of Cheltenham.
- 6) The drainage issue on North Road West caused by the development of the BMW site has yet to be addressed. Any future development will exacerbate the problem and therefore this needs to be resolved before any development is even considered.

Comments: 4th June 2018

I wish to strongly object to this proposed development on the following grounds:

- 1) The existing planning allows for B1 and NOT A1 class
- 2) The traffic at peak times adjacent to the BMW development is already stationary /gridlocked. Therefore the road infrastructure in this area is NOT able to take further development.
- 3) We already have Morrisons, ASDA, Home Bargains, Spar and a local store/Newsagent in our area. Therefore there is NO requirement/need for additional supermarket or coffee outlet this side of Cheltenham!
- 4) CBC should be acting strongly to encourage shops to move into the town centre and move away from out of town stores. Otherwise Cheltenham will become like other towns full of boarded up shop fronts.
- 5) If this development is allowed to proceed there will be significant noise and pollution impact to this area of Cheltenham.
- 6) The drainage issue on North Road West caused by the development of the BMW site has yet to be satisfactorily addressed. Any future development will exacerbate the problem and therefore needs to be resolved before any development is considered.
- 7) Any development should utilise the brown field land adjacent to "Pure Offices" first.

Linghem
The Reddings
Cheltenham
Gloucestershire
GL51 6RT

Comments: 12th June 2018

There is simply no need for a third supermarket in this area as it is already served by Asda and Morrisons.

The increase in traffic is of significant concern, particularly around the entrance to the proposed development where there is already serious congestion at peak times. This would inevitably lead to The Reddings being used as a cut-through to avoid the congestion.

This is Green Belt land that should be preserved.

South Park
Cheltenham
GL51 4XD

Comments: 14th June 2018

1. This application appears to be substantially the same as the previous one (16/02208/FUL). I was opposed to that and was glad to see that it had been refused by Cheltenham Borough Council. The reasons for that refusal are equally relevant to this application.

2. The BMW showroom should not have been allowed on this site. It has not led to an increase in local employment and was not envisaged when permission was originally given for B1 offices (which would have provided additional employment). Furthermore it is an absolute eyesore on a highly visible access road to Cheltenham. Whilst that permission cannot be undone, any additional applications for this site should be considered very critically.

3. The land is Green Belt and is critical to maintaining the separation of Cheltenham and Gloucester. The AMEC Green Belt review (carried out to support the JCS) gave it an extremely high rating in fulfilling the purposes of Green Belts. (This review was not available as evidence when the existing development was allowed on appeal and, if it had been, may well have affected that decision).

4. If there is to be any further development on this site it should be restricted to B1 offices, which is what the original permission allowed. I am particularly concerned about the creeping "retailisation" of the area. I do not think we need more on this particularly sensitive part of the Green Belt

5. Road traffic in the area was already congested at certain times before the BMW showroom was opened. It has since predictably worsened. Grovefield Way / Up Hatherley Way or the South West Distributor Road was supposed to provide a relatively fast route around this part of Cheltenham between the A40 and the A46. This function will be further compromised by the proposed development.

St James House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 8th October 2018

Our original objections to this hair brain development still very my stand.

The roads in the area are already gridlocked at certain times of the day. There is no way that they can cope with any more additional traffic. Workers at the existing eye sore BMW garage use the surrounding roads to park their cars. There are always cars parked in the paved gaps along the verges along Grovesend Way, which can be extremely dangerous when it comes to them driving

away at the end of the day. All this will only get worse with further development, not to mention the constant stream of traffic that another supermarket would bring!

The development is completely unnecessary and with Mini's recent announcement that they will stop production at their Oxford plant post Brexit, it makes me wonder how long the so called flagship dealer on our doorstep will be there!

Please leave The Reddings alone!

Comments: 11th June 2018

Our original objection to this development still very much stands.

The surrounding roads are already gridlocked from 8am until 9:30am and then again from 3:30 until 6pm. There is absolutely no way that The Reddings could cope with the additional traffic that another supermarket, offices and a nursery would create.

Please please please leave The Reddings alone!!!!

Initial objections detailed below:

We whole heartedly object to this outrageous planning proposal and agree with all objections listed.

This whole application taking place over the Christmas period and not informing many of the local residents feels underhand. The first information received through the door was from other concerned residents on Sunday 8th January 2017!

* GREENBELT: This land is Greenbelt and should not be developed. The BMW garage development should never have been given permission. Greenbelt should not be transposed as Green Light to a free for all on all manners of development! Since construction of the BMW garage started there have been attempts by planners to reclassify the area up to the railway line as 'non Green Belt' land. One planning proposal for the development of 27 houses off Brock Close has thankfully been refused. The construction of 13 bedsits at the 'Hayloft' on The Reddings appears to have gone under the planning radar and there will no doubt be more of this kind if this development goes ahead as it will strengthen the argument for reclassification of this area. In addition any development in this area will lead to the destruction of wildlife habitat.

* TRAFFIC/CONGESTION: The roads within the surrounding area are already saturated with traffic during rush hour. We have yet to see the effect of the BMW garage when it opens. An additional supermarket, offices and food outlet would lead to gridlock in the area during peak times. With what is generally deemed peak times, only being extended into evenings and weekends. We live on The Reddings which is used as a rat run for commuters who regularly exceed the 30mph speed limits. We have complained to our local councillor, who said nothing could be done as this is a bus route! The Reddings and North Road West being rural residential areas were never intended to cope with the current volumes of traffic, let alone any future increases if this development goes ahead. Both roads have pavements on one side of the road only (with the pavement on North Road West only running from Grovefield Way to the Community Centre). Crossing the roads in the surrounding area (particularly The Reddings/Grovefield Way and by B&Q) is horrendous. We fear for the safety of our children, plus the many elderly residents in the area - an accident waiting to happen.

* UNNECESSARY DEVELOPMENT: We do not need a 3rd supermarket, offices or coffee outlets in the area. We have Asda, Morrisons, Springfield Provisions, Home Bargains and The Spar within close proximity which more than cater for the local residents needs. With Morrisons and Asda having coffee shop/eating facilities onsite. Not to mention KFC drive thru and The Harvester, both of which are open from breakfast until late. The offices next to Asda are not fully utilised and the brown field site adjacent to this that was originally planned for expansion of this has not been built on proving the lack of demand for these facilities.

* BREXIT: Has anyone considered the impact of Brexit on BMW and Aldi, both of which may be impacted by the trade tariffs that might be imposed if we leave the single market. These businesses could become far less competitive in a post Brexit environment.

14 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 18th June 2018
Letter attached.

Comments: 8th October 2018
Letter attached.

Linley Cottage
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RE

Comments: 4th October 2018

I object to this amended application 18/01004/FUL in that although the 'Costa Coffee' retail unit has been removed from the submission the application is contrary to EM3 of the Cheltenham Plan about to be sent to the Secretary of State for Public Examination.

The site was removed from the 'Green belt' for 'high end' employment use only, and must not therefore be used for retail or other inappropriate purposes such as retail in the form of a Aldi supermarket or Child Day Nursery, but for only B1 Office use.

In more detail.....

The long standing accompanying documentation is inaccurate and out of date, still carrying frequent references to the Costa Coffee retail unit. All submitted documents, supporting reports etc should relate to only that currently under consideration.

The Economic Impact Assessment, TPA Technical Note, Parking provision, Trip analysis all appear to be based in places on conflicting assumptions, leading to severe doubts and confusion about the general accuracy of the application.

Information regarding proposed parking provision is not easily digested, with, for instance Aldi requesting more spaces than formally proposed by the TPA Technical Note and it is totally unclear from the current submitted plans whether the 26 parking spaces at the rear of the Child Day Nursery is for the sole use of the Nursery or forms part of the larger Aldi Car park, aggravated by a single access to both.

The Vehicle Trip Comparison refers to a weekday AM peak between 8am and 9am, PM between 5 and 6pm and Saturday 12noon until 1pm, as a local resident I am not familiar with the Saturday times at all, these I suggest are at best an assumption based on Aldi's proposed presence. Traffic congestion is not only restricted to these times, again as a local resident I suggest the morning peak time to be from 7.30am until 9.30 and in the afternoon from 4.30 until 6.30pm, waiting times of 10 - 15 minutes are regularly experienced when approaching the Arle Court roundabout from Up Hatherley and Grovefield Way.

Most weekdays many employees of the BMW site consistently park in surrounding residential roads, verges and roadside 'pull ins', and together with employees of other local organisations use the adjacent 'Park and Ride', greatly reducing its availability to 'bona fide' town centre visitors and employers. This must not be repeated.

All employees and visitors cars generated by the proposed development must be accommodated within the site, this should be conditional on any eventual approval. The existing uncontrolled off-site parking problem must not be exasperated.

All vehicular and pedestrian access to the site must be only via the existing estate road adjacent BMW. The small access point from North Road West shown on the submitted drawings should be removed.

The Retail and Planning Statement submitted in support of the application appears to be assumptive and without comprehensive local foundation or support, dated 22nd May 2018 this again needs revisiting to reflect the current proposal.

The submitted Design and Access Statement dated 22nd May 2018 is out of date, the addendum and original should be in one document to avoid confusion.

The plans submitted fail to show adequate measures within the development boundary to slow the rate discharge of surface water from the site. The site will be entirely covered in buildings and hard surface roads and car-parking, unless comprehensive proposals are submitted which limit the rate of discharge, flooding in the area will increase, the junction of North Road West and Badgeworth Road, and fields between Badgeworth Road and Bamfurlong Lane are particularly vulnerable.

The area is already served by adequate large and small retail units. The proposed Aldi food retail unit will threaten the viability of existing businesses and require unwelcome high intensity lighting during the proposed opening hours even generating noise, pollution and congestion during weekend and evenings when at present there is none. This retail element of the proposals should therefore be removed or the application refused.

The Child Day Nursery is proposed to be located in the middle of what can only be described as a large, constantly trafficked car park within an employment park and will suffer from, noise and air pollution and be difficult and dangerous to access other than by car.

In conclusion I urge the Council to refuse this hybrid application (in an area released from the Green Belt for employment use only in the JCS), due to the continued inclusion of the Aldi food retail unit and Child Day Nursery, contrary to the JCS and to EM3 of the Cheltenham Plan.

March House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 12th June 2018

I object to this proposal.

The wording of the title of this submission is identical to submission 16/02208/FUL which was refused permission by the Council Planning Committee in December 2017.

Apart from minor detail changes, the new submission is substantially the same as the original one. My objections to the original submission are equally valid to the new one, the main ones

being unnecessary violation of the green belt with inappropriate development and unacceptable traffic generation. I also endorse all of the detailed comments made by the Reddings Resident's association.

The reasons for refusing 16/02208/FUL set out in the Council's refusal letter are equally applicable to this application which should therefore also be rejected.

Comments: 1st October 2018

This planning application was originally submitted in June 2018, and I commented on it then. This version of the application makes a minor change which is the omission of the Costa Coffee Drive through outlet. This is a welcome change as it would reduce the amount of extra traffic which would inevitably be generated if this scheme were approved.

Apart from this minor change the scheme is essentially the same as that described in submission 16/02208/FUL which was refused permission by the Council Planning Committee in December 2017.

My objections to 16/02208/FUL were set out in some detail when I commented on this planning application in Autumn 2017, and are still valid, and I reiterate the main points below:

This area of green belt was sacrificed following a public enquiry. The inspector considered that there was a shortage of land available near Cheltenham for development for employment purposes and gave outline permission for office development (Class B1). This application includes a significant proportion of retail (the proposed new ALDI store), and the developer argues that this is essential to attract clients interested in renting office space. This argument is dubious to say the least bearing in mind that there is an ASDA supermarket within a short walk, not to mention B&Q/Home Bargains which are even closer. It is interesting that the developer apparently already has two clients (Bloor Homes and Hunter Page Ridge planning) who wish to use some of the proposed offices as new headquarters buildings.

The creation of a new ALDI store on the development is unacceptable for the following reasons:

- If it were approved, it would set a precedent for other retail development on the other parts of the site not immediately developed for offices thus running the risk that this previously green belt site would turn into yet another retail park.
- The road system adjacent to the site, notably the Arle Court roundabout and Grovefield Way are already operating at above capacity with gridlock at peak periods. The additional traffic generated by a retail store of this size (compared with the permissioned office development. The developer's transport plan is based on out of date traffic survey data.

I therefore oppose this application and urge the Planning Committee to reject it.

Pserimos
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 14th June 2018

With reference to this planning application we strongly OBJECT:

1. The BMW Site is already an eyesore. It will bring extra traffic, there is already a big que every morning And the new site is not even open yet.

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2. We DO NOT need another supermarket!!! We already have ASDA within quarter of a mile from this proposed development.
3. we DO NOT need another drive-through, we already have a kfc - this area is not a big retail park.....its GREEN BELT.....in case you hadn't noticed.
4. I am sad to hear that planning permission has already been granted for more offices on this site when the Pure Office development has not been fulfilled and my worry is that the Office part may be temporarily put aside and then if not needed a grant for change of use will be applied for and easily granted , resulting in possibly EVEN MORE retail business.
5. The number of parking spaces being only 346 for all of this new development this is insufficient and will result in the same scenario as at Pure Offices when not only the approach roads but the pavements are being parked on resulting in restricted movement for pedestrians.
6. The local Community Centre already operates a fair amount of Child Care on its premises during the week and this would be eroded and have an effect on the Community spirit in the area.
7. A fair amount of hedgerow has already been removed by BMW developers and anything further will have quite an impact on the environment in terms of Birdlife, Flora and Fauna to say nothing of increased pollution and traffic fumes and it will be the local residents who will suffer most. It was not so very long ago that this area was in Green Belt and this is being quietly eroded in the name of progress.
8. It might also result in the need for further traffic calming measures which have already been abandoned as inappropriate with the road being too narrow for what are already bus routes.
9. The current BMW site already results in overspill of traffic into the local area. WHY are these sites ALWAYS developed with inadequate parking? It seems your Planning Dept are incapable of counting properly. PLEASE PLEASE ensure adequate parking is provided, DO NOT create a situation where people have to park on local roads. WE DO NOT WANT THIS!!
10. It will also have a great impact on local business which are already suffering from the ASDA development

Put simply - this development IS NOT NEEDED by the local community - there are far more better suited urban areas that can be chosen!

40 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 12th June 2018

1) Traffic and transport assessment. No modifications to the highway outside of the development boundary are proposed. This stretch of highway is already in need of development. This proposed development will only make things worse (congestion, confusing highway junction arrangements increasing the risk of incidents etc).

2) Linked to the traffic and transport - air quality and noise assessment is inadequate given the close proximity of residential areas. The opening hours of the Aldi will increase noise levels later into the day. Due to the slower speeds and congestion that will now occur the air quality will suffer as a result. With residential areas so close this will not be good for the health of residents, including our younger generation. Delivery vehicles will contribute to a severe decline in air quality and present unacceptable noise levels. The Golden Valley roundabout is already a bottle neck in both directions at peak times and so is the one at Arle Court park and ride. This

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development would increase the traffic at both roundabouts and could lead to grid lock at times because the road width at the entrance of the site is not wide enough.

3) Local need - Is there a need for another supermarket given the very close proximity of existing supermarkets (Asda, Morrisons, Pets and Home, Home Bargains etc)?

4) a) Costa Drive Thru - as the name implies, the facility is there to encourage people to drive to it and is therefore of little attraction to the local population, cyclists or bus users. The area is already well served by the local Asda cafe, KFC, Harvester and the burger van in the B&Q car park. The sheer amount of additional traffic for a drive through coffee shop is unacceptable. It will also create a litter problem. We do not need a coffee shop!

5) Parking - the BMW garage already suffers with inadequate amount of parking. Resulting in cars using the nearby residential streets for parking. In fact there is already a car that parks on the verge just outside the BMW garage on a daily basis. There is clearly not enough parking proposed and this will only encourage more inappropriate parking in streets and residents will be impacted hugely.

6) Ecology and Environmental impact assessment. Inadequate assessment for this kind of development. I do not see any sustainable measures proposed either - rainwater harvesting, solar panels, compensation planting, SuDS etc.

7) Lighting assessment - this development will adversely affect nearby residents. The lighting design needs much more development.

8) Erosion of the Green Belt: The area of the proposed development is a green belt area. Over the last 15-20 years there has been a steady and gradual reduction in the green belt as commercial properties have been built (e.g. Asda, B&Q, KFC, Park & Ride, BMW, etc). This needs to stop now to preserve the remaining green belt areas. Please take a stand for both now and the future.

12 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 11th June 2018

This is plan is no different to that previously applied for and rejected.

There are two supermarkets within one mile .coffee can already be obtained from several sources already.

However the road system cannot cope with proposed plan.

Comments: 8th October 2018

1. There are already two supermarkets nearby.
2. Traffic on Grovefield Way is already busy with long queues at peak times.
3. Pollution is already bad .
4. BMW is causing problems with staff parking. Any further development will matters worse.

48 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 13th June 2018

hello i strongly object to revised planning at grovefield way.

There is no planning as far as i can see for how to deal with extra traffic which is already to busy at peak times

Comments: 8th October 2018

Really not happy regarding increased traffic pollution etc , the roads in this area already congested at peak times

5 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 19th September 2018

Previously I have objected on the grounds of traffic increase in this area. Since the arrival of Cotswold BMW on the next site there has been an undesirable increase in parking in the surrounding roads. This has been an inconvenience and even a danger to residents and road users, as cars have been put in blind spots and within the forbidden distance of turnings and T-junctions. Any increase of this, which is inevitable with this proposed development, is quite unacceptable.

3 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 11th June 2018

I would like to formally object to this planning application for the following reasons;

- (1) The revised proposal has not addressed the objections from the last rejected planning application.
- (2) Requirement for a further supermarket. We already have ASDA and Morrisons close by. The trend is for online shopping deliveries, we live very close to ASDA and each weekend there is a constant stream of supermarket deliveries in Barrington Avenue and the surrounding roads. A new supermarket will bring in shoppers from outside of the immediate area adding to road congestion and pollution. Additional noise and air pollution from delivery lorries throughout the day / evenings.
- (3) Requirement for a coffee shop. We have local coffee shops available - ASDA and Morrisons. Surely GCHQ and BMW have coffee facilities? Having a Costa will bring in more non-local traffic, pollution and in the evenings an increased chance of antisocial behaviour.
- (4) Local road infrastructure and parking. During peak hours the local roads are at a standstill, running engines adding to the local pollution. The 'donut' roundabout has been a great success at the Gloucester end of the Golden Valley. The traffic at the Cheltenham end has to make its way into a single lane. This is impacting the traffic on the interconnecting roads. It is almost impossible to leave the junctions without traffic lights on the roundabout next to the Golden Valley hotel at

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peak times. Since BMW opened we have had to contend with employees parking their cars on local residential roads. Initially we complained to BMW but have now given up. The 'park and ride' is at capacity. When planning was originally granted for the estate I live on did it include the requirement to provide parking to local businesses?

(5) Nursery / Playgroup provision. We already have very excellent provision for this. Adding extra will ultimately see a battle to retain numbers. Community playgroups should be given priority over commercial operators. The additional pollution that will be produced by the overall proposed development should be considered in relation to where children spend time.

(6) Increase office space in the area - Pure Offices still advertising empty space very close to the proposed development. Most companies are now offering working from home and all the indications are this will continue into the future. There is no long-term justification for more office space.

(7) Given the recent economic outlook for retail / food stores based on recent results / announcements in the press, now is not a good time to look at expanding developments which ultimately could be empty in a few years. The scenario here is increased disruption and pollution during the build, followed by increase disruption and pollution during the first few months (years?) of operation, followed by empty buildings as retail / food businesses consolidate and move toward a 100% ecommerce model. Resources would be better deployed working on how the Cheltenham will respond to changing consumer habits and potentially large vacated buildings - House of Fraser?

Comments: 4th October 2018

I strongly object to this planning application (again) for the following reasons;

Air and noise pollution due to the proposed increase in traffic. It also looks like the proposed car park will not be large enough to cope at peak hours so increasing traffic congestion and raising the risk of road traffic accidents.

There is ample shopping provision locally already (ASDA and Morrison's + convenience stores).

Risk of flooding due to the removal of the current field.

Impact to local wildlife and plants.

Whilst Costa has been removed it will almost certainly be added back in once planning has been granted.

The local streets are STILL used by BMW staff for parking. CBC and BMW are incapable of managing this issue and this will only get worse if this development goes ahead.

There must be some consideration to the amount of objection this proposed development is having and an end to this war of attrition to get the development approved.

Maison Des Femme
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 25th September 2018

While the removal of Costa is a good thing, the remaining planning application is still the same and therefore still going to be a major cause of noise/light/exhaust pollution, traffic congestion,

parking problems for local residents, a corruption of greenbelt policy, and does not address the flooding caused thus far since BMW was constructed. Any planning proposal needs to be much smaller, non-retail to allow for sufficient on-site parking, and have office hours access only. Such a proposal would probably fail since the development at nearby ASDA for office space remains under-developed due to lack of demand.

Comments: 5th June 2018

I wholeheartedly agree with all the environmental and technical objections already made by the other residents and have nothing new to add the objections I have previously made. There is nothing positive to say about the proposed development - it should NOT be allowed.

1 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 11th June 2018

I submitted objections to the initial planning request for this development and can only see cosmetic changes to this new submission which appears to be typical of large corporations who continually resubmit requests until councils give up and agree. Hopefully the standards in Cheltenham are higher and will see this resubmission for what it is and think of what is right for the area and decline this planning request.

I have read all the comments made by The Reddings Residents Association (TRRA) and fully support their objections.

Summary

- 1) To be clear, TRRA do not take issue with the B1 elements of the application nor the extant permission as a fall-back.
- 2) TRRA and the vast majority of the 1000 households that it represents, the ward councillors, neighbouring residents' associations, businesses and parish council have previously objected to the non-B class application. No comments in support of this application have been made to date.
- 3) As set out, we find a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF.
- 4) Some of the reports submitted are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.
- 5) The Local Plan is not yet finalised, and the Retail Plan is not written. This application is not consistent with either.
- 6) This proposal is contrary to the current retained Retail Plan.
- 7) The reports were drafted before the current editions of the Local Plan and JCS.
- 8) Objection reports were filed by other traffic and planning consultants in respect of the previous application. These refute many of the applicant's reports, conclusions and claims. The applicant reports in support of this application do not address them.
- 9) The traffic data is grossly out-of-date and the more recent survey is unreliable.
- 10) Air quality monitoring and objective, impartial assessment is required.

11) This proposal is very different to a B1-only proposal inasmuch as offices are likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day. Also, further light pollution from vehicle headlights shining into windows at all hours would occur.

12) Traffic was bad and is now very bad following the BMW being opened in August 2017. Traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted. This was a significant concern for the planning committee.

13) Acoustic background noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly compared to the extant B1 permission. The problem is compounded by the applicant having previously felled much of the tree and vegetation screening along the A40 and Grovefield Way to display their BMW building.

14) B1 is likely to create modal shift with local jobs for local residents. Conversely, retail will encourage journeys from out-of-town. As such, it is contrary to the NPPF.

15) If permitted, this will be the 15th Costa Coffee in Cheltenham. In this regard, the county is already a laughing stock. Costa will also encourage consumption of hot drinks whilst driving.

16) The applicant's projected full time B Class job numbers are misleading and use incorrect numbers.

17) The very special circumstances in 2007 were to permit the use of premier Greenbelt land for employment purposes with the creation of high value B1 jobs on a large site. The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs. This proposal will take a further 12% of the site for non-B Class development to create 71 associated new full time jobs. However, that will be at a cost of 132, or more B1 jobs that would be created on the same 2448sq meters of the site. As such, the loss of B1 jobs to the retail/childcare A and D class proposal will remove a potential £588,000 per annum from the local economy compared to the equivalent B1 employment wages that would be generated by the extant B1 permission.

18) Altering the site contours and stockpiling of soil during the BMW development has altered the historic ability of the site to absorb storm water run-off from Grovefield Way. This is causing flooding to local houses. The proposed development must account for this water in their designs, having already realigned the entrance road, and missing the chance to improve the highway drainage whilst doing so. A local spring has also changed course and is causing continuous damage to the adjoining highway "North Road West".

19) The nature of the application, with only outline permission requested for the majority of the B1 offices, means that neither CBC, nor residents can have confidence that the proposals placed before them are transparent or coherent, and that the applicant will not subsequently reapply to adjust the proposals once he has secured permission for A and D class development on the site, as he did for BMW.

20) The proposal is not appropriate development in the Greenbelt.

21) The development does not pass the sequential test because The Reddings area is not recognised in the policies retained in the Local Plan. The former BMW site on Tewkesbury Road (now a Lidl & Starbucks) is nearing completion. Do we need another supermarket or coffees shop? The large Wholefoods and Baileys sites are now vacant. Paragraph 27 of the NPPF clearly

states that if the sequential test is failed, permission should be refused. The sequential test is undoubtedly failed. The applicant's comments regarding North Place are speculative.

22) It is clear from the applicant's own economic analysis that a combined loss of turnover to Morrisons, Asda and "other" local stores of £6.89m will occur. That represents existing jobs and shops in the local community that will be lost. £6.89m is 60% of the projected total turnover for the new Aldi. At best the job losses will be translated to equivalent jobs at Aldi. Statistically, however, it is fair to say that only 40% of the jobs projected for the proposed Aldi will be new jobs. That said, as the whole economic analysis is based on trade diversion, the balance of new jobs at Aldi must also relate to jobs lost elsewhere in the county. This "trade off" will not occur if the applicant builds the B1 offices that he already has permission for.

23) The draft unilateral undertaking by the developer on the previous application does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.

24) There are so many flaws in this application that we are surprised that it has been brought forward for consideration, when the previous application identified that only some of the worst aspects of the initial application had been adjusted over the course of several amendments in 2017. The current application makes only minor cosmetic changes and still fails to properly address the concerns that were raised in the previous application.

TRRA believe that our community, and Cheltenham, deserves the right solution in line with the visions of the emerging Local Plan. Precious Greenbelt has been sacrificed for this B class employment land site. For that to have happened just to make way for more coffee shops and supermarkets would be wrong and we find nothing to support the applicants advocacy for same in the facts of this matter.

I urge you to reject this application and thank you for your time and consideration of this submission.

Comments: 5th October 2018

Once again we wish to object in the strongest possible terms to the revised application.

We wholeheartedly support the submissions on behalf of the local residents made by the very capable Residents Association who have expressed most succinctly all our objections and would urge the Planning Committee to refuse the latest application.

Nothing has changed in that there is still no need for yet another Supermarket in the area. We are well served by Asda and Morrisons.

There is still no need for yet another Coffee outlet in the area. There is a coffee shop within both previously mentioned Supermarkets.

Traffic and pollution on Grovefield Way and Hatherley Lane is already at saturation point at certain times of the day.

We absolutely support all the comments made by our local Reddings Residents Association.

It is disappointing the developers can keep putting in for planning when they have already been turned down several times and there are so many objections being registered. I trust that the Council officers take into consideration the residents that they serve and not buckle to the

demands of developers who will be here today and long gone tomorrow leaving the damage of their inconsiderate plans behind them.

Kestrel House
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 17th June 2018

Traffic volume has already reached a dangerous level as a result of the most recent developments. There are several junctions where excessive speed and poor driving are very likely to result in a potentially serious accident.

Parking has also become a serious concern. There are times when access due to parked vehicles is very difficult leading to bad feeling. If it were emergency vehicles needing urgent access time could be lost wasting valuable, potentially life threatening time.

All of the above will clearly be having detrimental effects on pollution in the area.

11 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 12th June 2018

We strongly object to the planning proposal and agree with ALL of the other comments and objections.

1. GREENBELT: The land is Greenbelt and should not be developed. The BMW garage development should never have been given the go ahead and open the doors for further developments. We purchased our property with the knowledge that the area was Green belt and there would not be any retail developments on the land spoiling the lovely views that we have and the rural feel to where we chose to live. The value of our property will be affected by this development which is not good news for us.

2. LIGHT & NOISE POLLUTION - The BMW garage is far bigger than we expected & the lights that have been erected outside of the site are directed at our property and as they are so high they shine right into our bedrooms causing sleeping issues for the children. The building work was also very noisy and as someone who works from home it was very distracting. The new proposals for shops being open until 10 pm (Aldi) & 11pm (Costa) would add to the noise and light pollution that we are already suffering from with the building of the BMW garage. The proposed buildings would be directly in front of our house where we did have a lovely view of the country side and the hills. We enjoy watching the sunset over the hills.

3. TRAFFIC/CONGESTION: The roads in this area are already heavily congested with traffic during rush hour. An additional supermarket, offices and drive through coffee shop would lead to gridlock in the area during peak times in the week. We also fear that it would lead to continued congestion beyond rush hour into the evenings and throughout the weekend.

We live in the Reddings so that we can get to the motorway within a few minutes to commute to the Midlands, South West & Wales The Reddings is a rural residential area so is not designed to cope with the high volume of traffic that the retail parks have already brought. We have concerns

about people trying to park on the streets in our residential area to avoid the inevitable queues to get into and out of the new site which is in close proximity to an already congested Arle Court roundabout. As it is we have staff from the BMW garage parking in the roads outside our houses to avoid paying to park at the park & ride. This would cause further congestion on our roads and further safety issues for the children and elderly that populate this residential area

4. **UNECESSARY PROPOSALS:** There is no need for a 3rd supermarket, or any additional food outlets in the area. We have Asda, Morrisons, Springfield Provisions, Home Bargains, The Spar, KFC and the Harvester within close proximity. (Morrisons and Asda having coffee shop/eating facilities onsite.) A additional supermarket and food / coffee outlet would take away business from the existing businesses. the co-op / One Stop shop in Benhall has closed due to not being able to compete with ASDA for the local residents business. The Pure Office development next to Asda are not fully used and the second phase of offices have not been built and the land remains boarded up clearly demonstrating that there is not a need for further offices in this area.

17 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 12th June 2018

1) Traffic and transport assessment. No modifications to the highway outside of the development boundary are proposed. This stretch of highway is already in need of development. This proposed development will only make things worse (congestion, confusing highway junction arrangements increasing the risk of incidents etc).

2) Linked to the traffic and transport - air quality and noise assessment is inadequate given the close proximity of residential areas. The opening hours of the Aldi will increase noise levels later into the day. Due to the slower speeds and congestion that will now occur the air quality will suffer as a result. With residential areas so close this will not be good for the health of residents, including our younger generation. Delivery vehicles will contribute to a severe decline in air quality and present unacceptable noise levels. The Golden Valley roundabout is already a bottle neck in both directions at peak times and so is the one at Arle court park and ride. This development would increase the traffic at both roundabouts and could lead to grid lock at times because the road width at the entrance of the site is not wide enough.

3) Local need - Is there a need for another supermarket given the very close proximity of existing supermarkets (Asda, Morrisons, Pets and Home, Home Bargains etc).

4) a) Costa Drive Thru - as the name implies, the facility is there to encourage people to drive to it and is therefore of little attraction to the local population, cyclists or bus users. The area is already well served by the local Asda cafe, KFC, Harvester and the burger van in the B&Q car park. The sheer amount of additional traffic for a drive through coffee shop is unacceptable. It will also create a litter problem. We do not need a coffee shop!

5) Parking - the BMW garage already suffers with inadequate amount of parking. Resulting in cars using the nearby residential streets for parking. In fact there is already a car that parks on the verge just outside the BMW garage on a daily basis. There is clearly not enough parking proposed and this will only encourage more inappropriate parking in people's streets and residents will be impacted hugely.

6) Ecology and Environmental impact assessment. Inadequate assessment for this kind of development. I do not see any sustainable measures proposed either - rainwater harvesting, solar panels, compensation planting, SuDS etc.

7) Lighting assessment - this development will adversely affect nearby residents. The lighting design needs much more development.

8) Erosion of the Green Belt: The area of the proposed development is a green belt area. Over the last 15-20 years there has been a steady and gradual reduction in the green belt as commercial properties have been built (e.g. Asda, B&Q, KFC, Park & Ride, BMW, etc). This needs to stop now to preserve the remaining green belt areas. Please take a stand for both now and the future.

Comments: 27th September 2018

I find it incredulous that this has been resubmitted. This should be rejected permanently, building such monstrosities on green belt land is simply unacceptable. I wholeheartedly agree with all the environmental and technical objections already made by the other residents and have nothing new to add the objections I have previously made. There is nothing positive to say about the proposed development - it should NOT be allowed.

I object to this for the same reason as the last set of plans, which were extremely similar. The points have been summarised very well by The Reddings Residents Association, and you may consider me raising the same concerns as they do around the local plan, the environment, the unreliable and incomplete traffic analysis, the economic impact, and everything else.

REJECT IT!

3 Shakespeare Cottage
North Road West
The Reddings
Cheltenham
Gloucestershire
GL51 6RF

Comments: 29th May 2018

I see very little change to the plans from the previous application. Most people who live around here are already fed up with issues resulting from the bmw site...there is no way the existing roads would cope with the extra traffic this would bring in, it's already a nuisance with bmw staff parking everywhere because of a lack of on site parking which will get worse once the park and ride start restricting it indeed charging for them to park in there. These places never provide enough room for staff parking because the more room they allocate for parking the less room they have to build on, I think we all know that?

Costa drive thru will bring in traffic from i expect 5am until 10pm and this is simply not acceptable in what is, at the moment at least a residential area.

I'm not convinced there is the need for a day nursery as there is one already just a few metres away at the community centre and I'm also convinced with Asda, Home Bargains, Spar and Morrison's all within walking distance as well as Springfield stores there is no need for another supermarket for local residents and any extra store will undoubtedly just bring in more volume of traffic.

The light pollution from bmw is already horrendous, the thing looks as if it could have come from the set of Close Encounters! How that was ever given permission to be built in the first place is bewildering.

We have wonderful wildlife around here at the moment and that will no doubt also be disturbed.

Comments: 7th October 2018

Light pollution.

Animal habitat.

Lack of on site parking resulting in cars parked in nearby streets which BMW staff are already doing despite conditions of their planning permission saying they wouldn't. It's high time developers actually provided enough on-site parking and quite simply if they don't they should not get permission to build, not just here but anywhere. Its clearly all about money, less parking spaces means more building so they make more money and sod the rest of us.

Destroying the hedge row along North Road West

Delivery times need serious restrictions as do loading, unloading etc.

Infrastruture. Sorry but the roads are already rammed at peak times with people using it as a rat run to avoid the main a40 how it is supposed to handle the extra traffic this development will bring to the area is baffling, well quite simply we will have another P.E way on our hands.

Asda, Morrisons, Spar, Springfield stores and Home Bargains are all within walking distance to proposed Aldi site so is it really needed? Its expanding now but soon enough the trend could stop, just like Tesco express amd Morrison extra stores.

I could go on and on.

I do hope if it gets permission in any shape the council will insist on parking restrictions in the nearby streets and not just wipe their hands of the issue because that is a highways decision? People around here will have to put up with enough as it is should anything get built, the very least the council and developers should do is insist on sufficient on site parking and put enough screening up to cover the site as much as possible which was originally promised but seems to have been overlooked, more broken promises, Having said that, just how they could hide the Spaceship that is the BMW showroom is beyond me!

That is a NO from me then!

Did i mention the light pollution? lol

4 Shakespeare Cottage
North Road West
The Reddings
Cheltenham
Gloucestershire
GL51 6RF

Comments: 12th June 2018

The minor changes to this "revised" scheme do nothing to change our objections to this scheme.

This is nothing more than an attempt to bulldoze the same sub-standard scheme through, with CBC support, to try and avoid the impending appeal on the previous refusal.

The revised sections are pure fantasy showing fully grown planting and unachievable levels. The existing hedgerow to North Road West is stated as being retained but the ground is shown now falling away immediately from the road - how is that possible?

The fully landscaped bund to the boundary to North Road West has still been omitted. Instead dropping the Aldi floor level to unachievable levels has been shown (these will no doubt be revised at a later date (as they were on the BMW scheme).

The new layout does little to redeem the proposals which are still unsuitable for the site. This is not sustainable development - this is trashing the edge of town for short term profit. The initial

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scheme was submitted 18 months ago. Market conditions are now showing that there is now a growing demand for B1 offices - build the extant scheme!

Remaining concerns include the following issues:

Layout

- The retail element still has the most impact upon the residences on North road West and is very close to the boundary with limited screening.
- Whilst the new drawings show plenty of green it is unlikely that this will actually materialise due to security screening concerns and poor implementation (as has happened with BMW).
- Insufficient parking which will lead to overspill on local streets (as has happened with BMW).

Use

- Proposes uses which duplicate existing facilities or for which there is no additional demand locally.
- A children's nurse within a sea of parking - is that really a suitable environment?
- There is an approval for B1 offices and a supposed local requirement for a cyber park close to GCHQ, the proposed site being currently undeliverable - is there no one capable of joining the dots?!

Massing

- Bulky 3 storey buildings which do not reflect the intentions of the original appeal decision.
- The proposed development is over-bearing, out-of-scale and out of character in terms of its appearance compared with existing development in the vicinity
- The original appeal decision stated that higher than two storeys should be considered only adjacent to the A40 only.

Design

- Bland and uninspiring facades.
- Unsuitable proposed materials.
- The BMW development should also not be used as a precedent for poor featureless and monolithic design or set the "style" for future buildings on the site.

Impact

- Detrimental to the amenity of nearby residences.
- Detrimental visual impact upon both the site and surrounding area.
- The understanding of the original appeal decision was that it was deemed an acceptable loss of Green Belt to provide local employment uses. It would generally be screened from view by boundary landscaping and layout of the site utilising the natural slope of the land away from Grovefield Way. It was not intended to be a gateway retail development as the first thing you see on entry to the town.
- Increased noise pollution with deliveries.
- Increased light pollution.
- Decrease in local air quality due to increased traffic.
- Local infrastructure, especially drainage.
- Detrimental effect upon the local ecology and wildlife.

Landscaping

- The landscaped treatment of the boundaries and in particular to the A40 was supposed to minimise views of the site and allowed glimpsed views only.
- The original appeal decision stated that a strong landscaping scheme would also be required to the southern boundary. The previous approval allowed for a landscaped bund to North Road

West which appears to have been omitted from the current application with the Aldi unit in particular pushed as close to the boundary as possible.

Transport

- The development will adversely affect highway safety and the convenience of all road users and pedestrians in the area.
- Traffic counts appear to have been taken in summer period towards the end of school summer term / around holiday time so are not an accurate reflection.
- The area is already gridlocked weekday mornings and evenings and the proposals will only make things worse.
- The application accepts that traffic levels will increase massively at weekends but considers that is fine as it makes it no worse than weekdays - there should be consideration for minimising traffic, and therefore pollution, at weekends particularly as the National Cycle Network runs past this site and utilises local roads.
- Parking provision is insufficient and will lead to on street parking issues in the area.

Comments: 9th October 2018

The changes do nothing to affect our objection to the scheme.

The Aldi supermarket is still closest to existing housing and will have the greatest impact upon the amenity of local residents every day of the week. Showing additional areas of green on the drawings do nothing to change that especially as landscaping schemes are never get implemented as they are shown. The building levels and treatment shown to the boundary with North Road West simply is not possible due to existing topography.

There are inadequate levels of parking proposed. The impact upon the local highway network will be considerable especially as main roads are gridlocked at peak times as it is. The subsequent light and vehicle pollution will be excessive.

Too many of the consultees are reliant upon planning conditions to resolve their concerns - travel plans, drainage, landscaping - these are never implemented correctly and CBC/GCC have consistently shown on previous schemes that they are not capable of / willing to enforce them.

This land has been taken out of Green Belt under "very special circumstances" to provide employment land for a large number of high quality jobs. There is a growing demand for B1 office space - there is no demand for additional retail. There is an existing approval for offices so if a green field has to be sacrificed build the offices and maximise the employment potential of the site.

8 Shakespeare Cottage
North Road West
The Reddings
Cheltenham
Gloucestershire
GL51 6RF

Comments: 11th June 2018

To process would show a total lack of consideration of the local community opinion. There are no changes to the previous plans that were rejected so am unsure how this is allowed to get to this stage. Also I am unsure the measuring methods used in the noise report, but the approx wording is well place to mislead (directly lie!).

Lack of parking for site

The car parking for all the offices are not suitable for the expected volume of workers. I also question whether the size of the parking spaces on the documentation can be accurate and when drawn accurately will show a further significant reduction in amount of spaces.

1. The result of this is the parking of cars in residential areas includes North Road West, North Road East and connecting roads.

2. North Road West has become the main route for Emergency services leaving the Bamfurlong Lane depot heading towards Cheltenham. Any addition of parked cars in North Road West would have a negative impact to Emergency services response times and consequences of this.

Road system not design to deal with increased traffic

The B&Q roundabout cannot cope with the current volume of traffic, when I spoke to the BMW architect; they stated that it was Asda to resolve this rather than that of the construction at the site. Nothing has been done and compounding the issue without major investment will cause further issues. Any additional businesses must resolve this issue as part of their plans.

The new turning lane for the BMW road entrance could only cope with 2/3 cars heading from the B&Q roundabout directing on Grovefield Way. This seems to have been built to cater for the level of traffic need for BMW only and not the additions of the offices, coffee shop and supermarket. This will cause tailbacks back on to the roundabout and an increase in pollution from the congestion.

Air Quality

The addition of all the cars especially those that are stuck in traffic due to the lack of road improvements will result in major pollution in the local area. It is well documented the damage done to children caused by pollution, and with a 6 month old and a 4 year old, there is significant risk to health of my children due to the proximity of the site.

Flooding

1. North Road West has turned in to a river on multiple occasions this year. Whether this is due to the building works or changes in weather patterns, it cannot be ignored. A traffic incident where a lorry left the road and ending in a ditch resulting in Road closure had a major contributing factor of the water on the road.

2. The reduction in grass and tree areas will result in major run off causing further local flooding.

3. Assumptions made in the flooding reports including basics such as height of land are out of date since the building and earth works of the BMW garage. The result of this is the fundamentals of which these reports are based are false and therefore produce wrong conclusions.

4. These and previous flood reports have highlighted the flooding risk to the properties to the West of North Road West caused as a direct result of the building work. If this building work goes ahead it would make a bad situation worse for the lives of the current residents.

Addition of supermarket to the design

1. There is no need with Asda and Home Bargains within 200 yards for another supermarket.

2. Proximity of bins will result in bad smells meaning windows will have to be shut reducing our quality of life.

3. The previous design had a green bank with trees. Now the view is a giant metal roof. How is this fair! It is like having a window looking at a brick wall! The runoff water from this will cause major issues down North Road West. But also the look and feel of the North Road West will be damaged beyond recognition.

4. Noise and health Air conditioning Units within 10 meters of my property. This may cause noise to the point of destroying the ability to use our garden. We have a child who uses the outside regularly, if the outside space is no longer usable, it will cause major impacts in to the health of our child.

5. Arrival times of lorries "Daily deliveries will take place between 06.00 and 23.00 Monday to Saturday and between 08.00 and 18.00 on Sundays." This will without question result in major disruption to a quiet and peaceful road as well as the health and well-being of the residences.

6. Air Quality due to cars in and out of site as well as air conditioning units at weekends would now affect our ability to use outdoor space at these times. When we are trying to encourage our children to play outside I am unsure how a plan to pollute the space my child play it can be considered acceptable.

7. The previous proposal of office space means that the noise and disruption would be kept to office hours. This was acceptable for the community on North Road West as mean the weekends would not have a major disruption. However to allow a supermarket on the site is a fundamental change to the level of disruption to the point that it can never be acceptable. Our child's bedroom looks over the site and this would mean it would directly affect his ability to sleep due to noise and light. The arrival times stated include before 7am and after 7pm means you will disrupt my child's sleep. If the supermarket plans are approved I demand a written explanation why the council puts money ahead of the health of my child. The long term damage caused by disrupted sleep in children is heavily documented and to go ahead with the plans of a supermarket so close to housing shows negligence to the welfare of residences but especially children living in North Road West.

It is clear to me that the stealth tactics of applying for office planning to slowly change the land's purpose abuses the Planning Approval Process. For such a major change to the original purpose of the land should require a new application rather than a change to current 12 year old one.

Tarnica
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 11th June 2018

I have previously objected to this planning application and do not see any reason to change my views.

While I was delighted to see that the Cheltenham Borough Council is promoting cycling through its renovation of the Up Hatherley Way cycle path, I feel that this commendable policy will be severely undermined by the building of this hybrid park.

Cycling down North Road West is already very dangerous due to the amount of parked cars on the grass verge or mounted half way on the pavement. I have nearly been knocked down by a passing car.

I feel that the new proposed hybrid park with its inadequate parking arrangements will only make the situation even worse.

Before any further development takes place the BMW parking issue needs to be addressed. There is plenty of unused space for all their employees.

Furthermore, I do not see how a new supermarket in the area can be justified as we are already very well served by Asda and Morrisons. This will lead to more traffic congestion and fumes.

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Cycling should be promoted as a healthy activity and as an alternative greener form of transport, not as a way of hyperventilating a cocktail of poisonous fumes.

Walking is even more dangerous in North Road West as there is no footpath and on one more than one occasion I have had to dive into stinging nettles to avoid being hit.

A drive thru Costa Coffee shop is an abomination and will only result in increased traffic outside normal trading hours and if KFC is anything to go by, a disgusting amount of litter.

After living very happily in The Reddings for 19 years I feel that I will be forced to move.

Why should I suffer for what is a very poorly thought through scheme which is neither needed or wanted?

12 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 11th June 2018

I wish to strongly object to this Hybrid planning application on the following grounds

1. Loss of Green Belt land

1.1. This site is Green belt and therefore change of use should not be allowed. A relatively small amount will be taken but is this beginning of the planning committee allowing little by little the erosion of the green belt surrounding Cheltenham?

If businesses are to benefit from development on green belt sites then should they not be financing the enhancement of other green belt/ green spaces in Cheltenham.

2. Insufficient car parking spaces for people using the site.

2.1. The number of parking spaces appears to have changed with each planning application but I am concerned that the number suggested will be insufficient because of the models used to calculate requirements of the development. The computer generated video that Hinton has produced gives a false impression of the car parking use on the proposed site: every other car parking space is free. In reality every space will be filled and those who cannot park on site will use local residential roads just as the locals have seen since the BMW business opened, GCHQ numbers have grown and the care village development has started.

2.2 Recently passed planning applications have all said that the car parking spaces provided on the site would meet the needs of the employees. How false this has proved to be. GCHQ employees are parking on all local roads surrounding the site. Asda, C3 church, Cheltenham Film Studio and Ultra Electronics employees have turned Hatherley Lane into a car park.

2.3 If the planning application is passed without increasing car parking spaces on site encroachment on residential roads will be witnessed.

3. Traffic flow

3.1. All local roads around this site are very congested at peak times. This proposed development would make travelling for local residents on local roads more difficult because of the increase in traffic to the 16 acre site.

3.2. Grovefield Way was designed and built as a single carriageway with roadabouts at road intersections. This road was not designed to have what will be a heavy a flow of traffic entering and exiting it at the proposed point at peak times of day.

3.3. At peak times traffic backs up from the Golden Valley roundabout way past the entrance to North Road West and to the roundabout at Asda. The entrance and exit to the proposed development will for many cars involve a right hand turn which will cause further traffic delays.

3.4. The Golden Valley roundabout is a bottle neck in both directions at peak times and so is the one at Arle court park and ride. This development would increase the traffic at both roundabouts and could lead to grid lock at times because the road width at the entrance of the site is not wide enough.

3.5. To avoid the delays on the A40 from Cheltenham to the Golden Valley Roundabout the Park and Ride buses, cars and lorries use Hatherley Road and Hatherley Way and other local roads. These roads are not designed for through traffic nor the route Park and Ride buses should use. This traffic causes further local congestion because of the parking problems caused by the lack of parking spaces allocated in recent planning applications (2.2).

4. Supermarkets

4.1. Another supermarket is not required on this side of Cheltenham. Local residents can walk to Asda or a local independent shop as easily as to Aldi. Within a 3 minute drive of the proposed Aldi there is already a choice of 2 supermarkets and within a 10 minute drive a choice of 8.

How many supermarkets can Cheltenham sustain?

5. Costa coffee

5.1. Two drive through coffee shops less than 1 minute from each other. More cars, more litter. More temptation for unhealthily eating and its associated health and social care problems!

6. The environment

6.1 Any development on this site would increase both light and noise pollution. At present the site produces neither as it is Green Belt land. How untrue therefore are the reports submitted saying that the noises levels after development would be less than they are now.

7 Office Space

7.1 There is no need for more office space on this side of Cheltenham. The planners approved the building of office space on the Asda site. Prue offices have only built one of the two office blocks planned. If there was a real need for more office space Prue Offices, as a commercial concern, would have built and rented out the space long ago.

Comments: 7th October 2018

I wish to strongly object to this planning application on the following grounds

1. Loss of Green Belt land

1.1. This site is Green belt and therefore change of use should not be allowed. A relatively small amount will be taken but is this beginning of the planning committee allowing little by little the erosion of the green belt surrounding Cheltenham?

1.2 If businesses are to benefit from development on green belt sites then should they not be financing the enhancement of other green belt/ green spaces in Cheltenham?

2. Insufficient car parking spaces for people using the site.

2.1. I am concerned that the number suggested for the site will be insufficient because of the models used to calculate requirements of the development.

2.2. The computer generated film shown by the development company gave the impression that the development provided more than adequate car parking spaces. From very recent local developments which have worked on similar car usage data, this is far from the truth and totally misleading and should not be allowed to be shown/included in any application.

2.3 How do the applicants transport analysis of a predicted more than 250 vehicle movements per hour fit into about 100 spaces, unless the majority of shoppers spend very little time shopping. This is an out of town supermarket not a convenience store.

2.4 Recently passed planning applications have all said that the car parking spaces provided on the site would meet the needs of the employees. How false this has proved to be. GCHQ employees are parking on all local roads surrounding the site. Asda, C3 church, Cheltenham Film Studio and Ultra Electronics employees have turned Hatherley Lane into a car park.

2.5 If the planning application is passed without increasing car parking spaces on site further encroachment on residential roads will be witnessed.

3. Traffic flow

3.1. All local roads around this site are very congested at peak times. This proposed development would make travelling for local residents on local roads more difficult because of the increase in traffic to the 16 acre site.

3.2. Grovefield Way was designed and built as a single carriageway with roadabouts at road intersections. This road was not designed to have what will be a heavy a flow of traffic entering and exiting it at the proposed point at peak times of day.

3.3. At peak times traffic backs up from the Golden Valley roundabout way past the entrance to North Road West and to the roundabout at Asda. The entrance and exit to the proposed development will for many cars involve a right hand turn which will cause further traffic delays.

3.4. The Golden Valley roundabout is a bottle neck in both directions at peak times and so is the one at Arle court park and ride. This development would increase the traffic at both roundabouts and could lead to grid lock at times because the road width at the entrance of the site is not wide enough.

3.5. To avoid the delays on the A40 from Cheltenham to the Golden Valley Roundabout the Park and Ride buses, cars and lorries use Hatherley Road and Hatherley Way and other local roads. These roads are not designed for through traffic nor the route Park and Ride buses should use. This traffic causes further local congestion because of the parking problems caused by the lack of parking spaces allocated in recent planning applications.

4. Supermarkets

4.1. Another supermarket is not required on this side of Cheltenham. Local residents can walk to Asda or a local independent shops as easily as to Aldi. Within a 3 minute drive of the proposed Aldi there is already a choice of 2 supermarkets and within a 10 minute drive a choice of 8. How many supermarkets can Cheltenham

5. The environment

5.1 Any development on this site would increase both light and noise pollution. At present the site produces neither as it is Green Belt land. There would be extra noise pollution from air conditioning units, reversing sirens of delivery lorries and of course all the noise produced by increased traffic.

6. Nursery

6.1. Is this site suitable for a children's nursery? It will be surrounded by congested major roads with their associated pollutants known to cause damage to developing lungs. The plans also appear to provide very little/insufficient outdoor space critical for the healthy physical development of young bodies.

7. Office Space

7.1. There is no need for more office space on the side of Cheltenham. The planners approved the building of office space on the Asda site. Prue offices have only built one of the two office blocks planned. If there was a real need for more office space Prue Offices, as a commercial concern, would have built and rented out the space long ago

2 Cyprus Cottages
North Road East
The Reddings
Cheltenham
Gloucestershire
GL51 6RE

Comments: 12th June 2018

This proposal is very different to a B1-only proposal. The offices would operate in normal office hours with predictable traffic at set times. The proposed retail outlets will be 7 days per week from early morning to 10pm with traffic flows all day and every day. Retail floodlights and light pollution from vehicle headlights at all hours would also occur.

The roundabout by B&Q is already jam-packed during peak times, how can it cope with further traffic?? Traffic levels have increased significantly following the BMW being opening in August 2017. Traffic fumes are already noticeable due to standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? Has current air pollution been recorded and how is increased future pollution being predicted or assessed ?

Noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly made worse by the reduction in trees and bushes around the area.

Also, why does Cheltenham need this development? We already have 2 Lidl's and an Aldi as well as Home Bargains (close by) which offers discounted goods. Why is another Costa needed too? You can get coffee in Asda (drink in or take-away)? By all means stick to the original plan of office space but not this - it just is NOT needed and will have a detrimental effect on the area.

19 Leyson Road
The Reddings
Cheltenham
Gloucestershire
GL51 6RU

Comments: 13th June 2018

Letter attached.

5 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 13th June 2018

My objections to the revised plan for the development of the Grovefield Way/ Cotswold BMW Site are quite straightforward.

There are enough supermarkets and smaller stores in the near vicinity.

The nuisance aspect of a drive through Costa Coffee is obvious. Cars entering and leaving at all hours and disturbing local residents plus light pollution. Safety aspects in drinking hot liquids and driving.

Are there enough parking places for the offices or is The Reddings going to turn into an even greater car park for local businesses?

The planned nursery will involve even more vehicle movements on and off the site at peak times.

The ongoing problems related to the Cotswold BMW Site have yet to be resolved. How many more will this development bring?

Comments: 5th October 2018

As I am unable to access the appropriate site in CBC's website I am writing to you to object the further development of the site known locally as Cotswold BMW.

I understand that office development is necessary and likely to go ahead. However I object to the addition of nursery, supermarket and possible Costa Coffee, which may or may not go ahead.

There is no need for another food retail outlet. Established businesses, both large and small, provide enough choice in the local area.

Increased movement of delivery vehicles will either add to the volume of traffic or will disturb local residents early or late in the day.

The traffic situation would only get worse. This includes peak time movement to and from the offices and nursery plus an overall increase to the retail unit.

As a result air pollution would increase, not ideal for any local residents and small children attending the nursery.

The future of the local long established playgroup is threatened by the introduction of a nursery.

North Road west has been blighted by the BMW building. I walked down the road this morning and water was running down the side of the road. Will measures be taken to correct this situation if the new development takes place? Or will it get worse? It is depressing that local homes are affected, but nothing is done to rectify the damage.

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It is unlikely that many new jobs will be created overall, though no doubt motors local streets will become parking bays as inadequate provision on site seems to be the new

Bellane
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RE

Comments: 11th June 2018

This whole planning proposal is preposterous and wrong on so many levels! It feels like a conspiracy!

There are so many reasons to object, which have been eloquently outlined by other objectors, including The Reddings Association, whose objections I whole heartedly back.

To cite just a few:

- Unmanagable Traffic/Congestion
- Increased Pollution impacting upon health of nearby residents
- Greenbelt
- Damage and destruction to the environment, wildlife and habitat
- Increased flood risk
- Completely unnecessary and surplus to local requirements
- Change of initial planning approval
- Out of keeping with local surroundings - the BMW garage is hideous!

I appeal to the better judgement of the CBC Planning Department and ask you to refuse this development.

32 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 8th October 2018

I object on the following grounds:

The remix of users proposed for this site will greatly increase the traffic especially in the evening and at weekends in addition to the already congested traffic at peak times am/pm. The recent highways observations were also taken in July a neutral month.

Car park spaces allowed on the plan of 191 do not meet the recommended need of 222. We already have in the area previous developments which have increased vastly the traffic flow and the car parking needs. The car parking needs are provided for these developments by businesses renting spaces in the P&R car park which leave inadequate parking for the public to

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use the facility for which it is intended and also to use the Hospital bus. The residents have also previously campaigned for yellow lines to be placed on Hatherley Lane because of the dangerous increase in using the road to park all day by local workers. The statements in previous planning applications of using cycling, walking and public transport for the already existing developments clearly do not happen to reduce the parking needs! This should be monitored as evidence by the CBC planning department. There is also unused office space at buildings very close to this development so no further need for office space. There are also two supermarkets in the immediate area already

Increase in local air pollution is extremely important especially if a children's nursery is to be considered. Cheltenham has already been identified by Government as a high risk area and a Feasibility study should have been carried out -was this development included in that?

The approved BMW has a very large lighting arrangement both indoors and outdoors which are left on very late at night so the light pollution in the area is vastly increased by BMW beside the lighting requirement for this proposal.

This is not a planning objection but an observation:

The fact that an amended application has been submitted to appear at a planning meeting before the Appeal was a surprise but on reflection if CBC loses the Appeal then it will be costly to CBC. I hope this will not influence our Planning Committee!!!

21 Galileo Gardens
Cheltenham
Gloucestershire
GL51 0GA

Comments: 27th May 2018

The transport plan is utter nonsense. It pulls together a set of figures that shows peak traffic at 0800 and 1700 Monday/Friday. It then suggests that the way they will manage any increase in traffic will be:

- to assume people will walk for the local area
- assume people will come by bus
- publish details on bus timetables, cycle paths etc.

Fundamentally, this is a elaborate attempt by the application to hide the fact they will do absolutely nothing to reduce the inevitable increase in traffic that will come. It is highly unlikely that any shoppers to ALDI would choose public transport over thier car for the obvious reason of carrying their shopping. The coffee shop is likely to draw additional traffic diverting from the A40, which will increase traffic.

On the business units. Still as yet the business units beside Asda remain at low occupancy, the additional unit beside Asda has not been built yet (one assume insufficient demand). We also have the new development at the film studios and the new Cyber Park due to submit for planning. It is unsustainable to encourage this business development in an already congested area with no additional improvements to the roads.

I would recommend that this application needs to be considered alongside the film studios development, Cheltenham cyber park and the existing facilities beside Asda.

Comments: 22nd September 2018

As per the other objections. It seems that the updates to the planning documents does not take into account any of the objections. This application should be rejected because:

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- There is no proven use for the office space as the office space near Asda remains unused. That site should be developed first
- The Cheltenham cyber park will bring significantly more office space and infrastructure and this development will conflict with the cyber park
- The traffic on Hatherley road will increase significantly at peak times due to the Nursery and the office space.
- The aesthetics of the building are unattractive
- There is no proven need for additional super market space with Asda in close proximity and Morrisons a short drive away.

10 Westside Park
The Reddings
Cheltenham
Gloucestershire
GL51 6RT

Comments: 19th September 2018

No No No , the roads in the Reddings area cannot take anymore traffic ,the reddings road is used as a rat run ,its to narrow , i have had cars over taking me , cars parked everywhere ,we already have two super stores we dont need anymore,Grovefield Way is a race track , so please NO

34 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 11th June 2018

Our previous comment stands and we still strongly object to the development. There is no need for additional supermarkets or coffee vendors in this area. The BMW garage has already increased light pollution, decreased wildlife in the vicinity and increased traffic. The nearby roads were not built for this kind of development. There has been an increase in parked cars on North Road West, The Reddings and Reddings Road, which reduces drivers visibility.

We object to the proposal for a mixed use development at Grovefield Way for a number of reasons.

1. The original planning permission granted in 2007 was for B1 office use. The application highlights in para 6.14 that the proposed mixed use development would result in a lower increase in traffic than a development that was exclusively for B1 office use, but neglects the impact outside these times. A B1 office development would typically increase traffic during weekdays at peak hours, with negligible traffic at weekends. The proposed development of an Aldi and drive-thru Costa coffee would result in increased traffic over an extended period during the weekdays and at weekends. The approach from Grovefield Way towards the Golden Valley roundabout is already at saturation point during peak hours. Another supermarket and coffee outlet apparently aimed at motorists (with the drive-through element) is likely to make traffic conditions during peak hours extend through the rest of the day and into the weekends.
2. There is no need for another supermarket in this area, since there is already an Asda ½ mile away, a Morrisons 2 miles away and several small retailers in the Reddings and Hatherley areas. The Iceland and Farm Foods stores at Edinburgh Place are also only 2 miles away. This is more than adequate provision of amenities and consumer choice.

3. The market catered for by Costa coffee is also well catered for in the area. The drive-thru element is a particular concern as people are likely to travel out their way to visit the premises, adding further traffic and pollution. Surrounding roads such as Reddings Road and North Road West are likely to become 'rat-runs' as people seek to avoid travelling via Grovefield Way and Hatherley Lane. Both Reddings Road and North Road West are unsuitable for large volumes of traffic.
4. Inclusion of a day nursery in an environment that will be surrounded by sources of traffic pollution is concerning. The Early Years Foundation Stage (EYFS) framework stipulates that all children should have outdoor play time. There have been several reports highlighted in the media recently about the damage that pollution from vehicles has to health, particularly from diesel emissions. The impact of the air quality on the children's health will, at best be detrimental, and could do serious harm. The application does not appear to have made any assessment in relation to this.

2 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 12th June 2018

This application looks identical to application 16/02208/FUL refused by CBC in November 2017, now the subject of appeal, except for the inclusion of some additional appendices.

Using the in-depth analysis of that application put forward by The Reddings Residents Association as the best source for comparison of this new application with the previous one, all of the issues raised, and the objections made at that time, seem equally as valid now as they were then.

There is hard evidence, visible every day, where the travel plan for BMW has not worked or been enforced and is creating local parking problems. Together with the increase in traffic and traffic congestion caused by feeding into the bottleneck between the B & Q and Arle Court roundabouts with no assistance from traffic light entry onto the Arle Court roundabout, there is little new information to give any confidence that any of this would change or improve with any new proposal for this site as it encourages indeterminable ad hoc travel as against B1 use which could be more determinable.

It seems an unlikely co-incidence that the same Planning Agency has submitted a proposal to get land between North Road West and Reddings Road, accessed from Grovefield Way, released from Green Belt into the Principal Urban Area for housing at this time.

If successful, it could be seen as the vehicle to support the argument that an additional supermarket and other retail facilities are required in the area which could then be presented in support of the appeal against refusal of 16/02208/FUL .

Assurances were given that the Green Belt boundary of Grovefield Way would be defended. This must prevail.

Only one meaningful consultee comment has been made, at the time of writing, being from Severn Trent on drainage, putting forward their suggestion to impose a standard development condition on any approval.

Bearing in mind all the problems associated with the existing drainage infrastructure to cope, it is surprising that a more robust demand for clarity of the intended design was not requested before

making their comment or that the developers agreement to cover the cost of any infrastructure upgrades that may be required was not asked for.

The flood assessment report for BMW is included but this was compiled in 2013 and we know there have been local problems since.

The GCC Preliminary report 2011, says no economic damage occurred. It might not have then but it certainly has since with property flooding.

The inclusion of the STWL drain record in North Road West, only confirms drains are in the area not whether they can take additional load.

It's too late to address these issues once permission is granted even if it is made a condition of approval.

Considering its key position on the site the floor plan for Costa Coffee is particularly vague. However with the external seating shown, it is obvious that Costa Coffee will not just be a Drive Thru but a stopping off place of destination, putting more pressure on traffic movements and car parking allocation for that business, which could see overflow into other parking area allocations.

The whole concept of a Drive Thru is also hard to understand as driving with a hot cup of coffee in hand is at the very least potentially dangerous on more than one level.

The Happy Days Nursery located in the middle of a car park, with little to no environmentally safe external play area, also seems against what childcare businesses strive for and are directed to achieve, in providing children with healthy outdoor activity as part of their daily routine.

All the issues raised against the previous application were debated by the Planning Committee in depth and who agreed with the overwhelming objections raised by the residents.

I cannot see how this position could change bearing in mind it's the same proposal.

The April 4th edition of Punchline Gloucester.com, an on-line business news magazine, reported that, according to commercial agents, Gloucester was benefitting from Cheltenham's office shortage, through conversion of office buildings to residential, and because of high property rents.

From the sheer volume of new build in and around Gloucester this could well be the case.

As B1 is already granted for this site there is still a chance to address this and to provide competitively priced offices to avoid the migration of businesses and maintain a healthy employment sector without taking more land to meet employment targets.

This seems yet another example of grounds to refuse this application.

At the very least this application should not be considered by the planning committee until the outcome of the appeal for application 16/02208/FUL is concluded.

Comments: 8th October 2018

I am writing to object to the revised planning submission with specific regard to proposals for the Happy Days Day Nursery and Aldi Supermarket.

I have been involved with activities at, and helped run, the Reddings Community Centre on a voluntary basis for over 25years during which time the Reddings Playgroup has been a core activity providing an important educational centre for local resident's children in a child friendly healthy location within the green belt.

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The proposed location of the Happy Days Day Care Nursery will, in contrast, be within a commercial heavily trafficked estate where contrary to their advertising literature currently on their website, their "new facility in Cheltenham" cannot provide the same level of healthy environment as that at the Community Centre with the limited outside space in the middle of a car park.

Happy Days website, together with an elevational illustration, states:-

"Cheltenham Happy Days will be an 81-place nursery/pre-school setting in Grovefield Way which will be open from 7am to 7pm, 51 weeks per year, offering childcare and early years education to children aged 12 weeks to 5 years. The setting is ideally located close to the A40 and A46 commuter routes into Bristol and Gloucester and has designated parent parking for ease of drop off and collection.

Happy Days are a proven, high-quality, childcare provider, who have achieved 11 Ofsted Outstanding judgments - 8 of those since January 2016. We provide secure, calm and neutral environments and wonderful outside areas with free-flow access throughout the day, and all our resources are carefully selected to allow children to experiment, explore and enjoy. A hug, a story, a song, a time to explore, experience and learn - it all happens naturally every day."

Happy Days, apart from the very young, intends to serve the same age group as The Reddings Playgroup and as such will set up direct competition being in such close proximity not only to the Reddings Playgroup, but to other established ones in the near vicinity.

The developers of local housing constructed in The Reddings circa 1998-2000, did so with a Section 106 charge negotiated by Cheltenham Borough Council, whereby they contributed to the rebuilding of the Community Centre which along with a Lottery Grant obtained by the Community Association, and the Community Associations own funds, secured the future of the centre for the local residents to continue to follow their interests by providing a meeting place suitable not only for playgroup but for all the other interests a community generates.

The activities have diversified and expanded since being rebuilt and now covers activities from Martial Arts to NHS seminars and after care clinics but it is Playgroup that remains the core activity of the daily routine.

We are all aware these days that competition is supposed to drive down costs but there comes a limit where this cannot be achieved and if we are to ensure that facilities already providing a valuable local service, are to survive then they must be given due consideration and every opportunity to survive.

This is also true for the last remaining independent local shop in the Reddings which provides another valuable local service which will come under further pressure if Aldi were to be built.

Regarding Aldi, there is conflicting assessments in the submitted reports.

The applicants transport analysis for Aldi predicts 282 vehicle journeys per hour but according to the revised Block Plan plan they will all have to fit into a car park sized for 104 cars. (or 102 or 125 cars dependant on which report you read).

Transport Planning Associates parking assessment, dated July 2018, refers to 154 spaces allocated for Aldi, Happy Days & Costa which taking into account the revised use of Costa (as noted above) this gives a balance of 125 spaces for Aldi & Happy Day alone but from the revised block plan it can be seen that 104 car spaces are allocated to Aldi & Happy Days which are further identified as 83 normal spaces, 12 Mothers & Babies spaces, 7 disabled spaces and a further 2 spaces for electric cars with dedicated charging points.

The spaces previously provided for Costa are now barrier protected solely for the newly proposed Office 5 so these 29 are not available for overflow.

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Clearly there is a contradiction of allocation in and around Aldi/Happy Days and it is therefore reasonable not to rely on the figures presented but what is significant in any calculation is where the remaining 178 predicted vehicle journey numbers will park.

If the additional spaces are to be allocated from another occupier's space, the knock on effect of having to park off site becomes more likely and the effect on local roads could be expected to be significant and one which must be avoided.

The Community Centre has already experienced access difficulties with BMW employees parking in or in near proximity of the entrance with potentially dangerous consequences and is a situation which could be seen to a greater degree with inadequate parking on the development site.

The effect of traffic and pollution has already been expressed adequately elsewhere but the proposed Cyber Hub scheme, to the West of CGHQ, to which Gloucester County Council has now given its support by setting aside £22m for the infrastructure, will mean even more traffic than has been predicted in this application for the Arle Court Roundabout.

This roundabout is already running in excess of its design capacity and any increase in traffic to/from the proposed development will put Grovefield Way under even more pressure.

Cheltenham reportedly suffers a shortage of affordable modern business premises and as this site already has extant permission for offices there is an un-repeatable opportunity to rectify this.

The applicants own planning consultant has expressed a serious interest in occupying the proposed ex Costa building for offices as has Bloor Homes on another.

This must re-inforce the argument for the site to be built out as B1 and one which should be sought to be achieved.

In conclusion the application as it currently stands should be refused.

Trehale House
Badgeworth Road
Cheltenham
Gloucestershire
GL51 6RQ

Comments: 31st May 2018

I object utterly and unequivocally.

The Green Belt must be preserved, there are still vast areas of brown field areas that could be built upon and this constant erosion of the protected areas is TOTALLY unacceptable.

The area is mostly residential yet despite objections the council approved the hideous BMW dealership, more offices, a supermarket and a drive through coffee shop will just compound the problem.

Traffic through that area is already painfully slow, I dread to think what it would be like if you approved this application, forcing cars through the small lanes at rush hours causing dangerous congestion.

Furthermore, a third supermarket is totally unnecessary when both Morrisons and Asda are a stones throw away, why on earth would residents want another??

Comments: 21st September 2018

I continue to object utterly and unequivocally - it's with dismay that the plans have changed so little, how long will this keep going on for??

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The Green Belt must be preserved, there are still vast areas of brown field areas that could be built upon and this constant erosion of the protected areas is TOTALLY unacceptable.

The area is mostly residential yet despite objections the council approved the hideous BMW dealership, more offices, a supermarket and a drive through coffee shop will just compound the problem.

Traffic through that area is already painfully slow, I dread to think what it would be like if you approved this application, forcing cars through the small lanes at rush hours causing dangerous congestion.

Furthermore, a third supermarket is totally unnecessary when both Morrisons and Asda are a stones throw away, why on earth would residents want another??

88 Redgrove Park
Cheltenham
Gloucestershire
GL51 6QZ

Comments: 13th June 2018

I wish to object to aspects of the above:

We local residents neither need nor want an further supermarket in this area - we have ASDA and Morrisons within walking distance of this proposed additional outlet, with Spar, the newsagent in the Reddings and Home Bargains similarly convenient. To provide another can only increase traffic into the area and render those existing, and their current employment, less viable.

Similarly, a Costa Coffee or similar can only attract more traffic, since nearby residents are, by definition, living close enough to provide for themselves. The incidence of littering will also be exacerbated.

The density of traffic using the Park and Ride roundabout is already beyond a tolerable level; any more will represent an unacceptable further penalty to residents already feeling this to be a blight on their lives.

In summary, more and more unwanted development is being forced into this now hard pressed area, largely against the wishes of residents who are already suffering badly in terms of quality of life and the environment.

Comments: 8th October 2018

I wish to OBJECT to the above planning application to build a new Aldi supermarket at Grovefield Way.

The down side of such a development is only worth tolerating if there is sufficient up-side.

There is little or no upside. We already have two large supermarkets commendably close to all local residents, indeed within a mile or so, with several other grocery outlets close by. These would all be negatively impacted by yet further competition with adverse effects on employment. If we really want Aldi produce then a large branch is perhaps just 2 miles away.

We just don't need another supermarket, Aldi or otherwise.

The downsides are many fold. The traffic congestion at the Park & Ride and Arle Court Roundabouts is already intolerable at peak periods.

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The reduction in residents' quality of life resulting from many additional large delivery trucks servicing a new store is a significant issue.

The effects of overspill parking into adjacent roads is yet one more negative.

When will it be realised that a quart won't fit a pint pot - and that's before any West of Cheltenham estate is built, and the Park&Ride is extended.

Please preserve what's left of our once pleasant local environment and refuse this application.

9 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 11th June 2018

I cannot see why another supermarket, Costa coffee and etc., is required in this area. There are already 2 supermarkets within reach of my property and a 3rd is not required. The traffic it would encourage on an already congested road is beyond belief. I can see that it would encourage more traffic to this area which I believe should be avoided at all costs.

There is also the issue of heavy good lorries delivering as and when.

As to a Costa coffee drive thru would encourage drivers running their engines whilst waiting for their coffees and car noise which is not required.

Comments: 13th June 2018

I can see no logical reason to have another supermarket or coffee outlet when there are 2 supermarkets within the same area and there are ample places to get a coffee, if needed.

This is already a traffic congested area and does not require further traffic or lorries.

Comments: 8th October 2018

This is already a congested area and cannot agree with the planning proposal. I have concerns on noise and pollution impact and the number of delivery lorries that would arrive. Considering this area was a natural habitat for wildlife not that long ago. I wonder what damage is being done to the environment with the BMW garage and your proposal for more building work. I don't see your proposal adds any value to this area. There are areas around Cheltenham that have the road infrastructure but this area is residential.

Reddings Residents Association

Comments: 10th June 2018

The Reddings Residents Association (TRRA) objects.

TRRA have prepared a detailed report which is too long to place here, so we will email a copy for the documents tab. A summary of the main points follows below:

Summary

1) To be clear, TRRA do not take issue with the B1 elements of the application nor the extant permission as a fall-back.

- 2) TRRA and the vast majority of the 1000 households that it represents, the ward councillors, neighbouring residents' associations, businesses and parish council have previously objected to the non-B class application. No comments in support of this application have been made to date.
- 3) As set out, we find a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF.
- 4) Some of the reports submitted are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.
- 5) The Local Plan is not yet finalised, and the Retail Plan is not written. This application is not consistent with either.
- 6) This proposal is contrary to the current retained Retail Plan.
- 7) The reports were drafted before the current editions of the Local Plan and JCS.
- 8) Objection reports were filed by other traffic and planning consultants in respect of the previous application. These refute many of the applicant's reports, conclusions and claims. The applicant reports in support of this application do not address them.
- 9) The traffic data is grossly out-of-date and the more recent survey is unreliable.
- 10) Air quality monitoring and objective, impartial assessment is required.
- 11) This proposal is very different to a B1-only proposal inasmuch as offices are likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day. Also, further light pollution from vehicle headlights shining into windows at all hours would occur.
- 12) Traffic was bad and is now very bad following the BMW being opened in August 2017. Traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted. This was a significant concern for the planning committee.
- 13) Acoustic background noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly compared to the extant B1 permission. The problem is compounded by the applicant having previously felled much of the tree and vegetation screening along the A40 and Grovefield Way to display their BMW building.
- 14) B1 is likely to create modal shift with local jobs for local residents. Conversely, retail will encourage journeys from out-of-town. As such, it is contrary to the NPPF.
- 15) If permitted, this will be the 15th Costa Coffee in Cheltenham. In this regard, the county is already a laughing stock. Costa will also encourage consumption of hot drinks whilst driving.
- 16) The applicant's projected full time B Class job numbers are misleading and use incorrect numbers.
- 17) The very special circumstances in 2007 were to permit the use of premier Greenbelt land for employment purposes with the creation of high value B1 jobs on a large site. The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs. This proposal will take a further 12% of the site for non-B Class

development to create 71 associated new full time jobs. However, that will be at a cost of 132, or more B1 jobs that would be created on the same 2448sq meters of the site. As such, the loss of B1 jobs to the retail/childcare A and D class proposal will remove a potential £588,000 per annum from the local economy compared to the equivalent B1 employment wages that would be generated by the extant B1 permission.

18) Altering the site contours and stockpiling of soil during the BMW development has altered the historic ability of the site to absorb storm water run-off from Grovefield Way. This is causing flooding to local houses. The proposed development must account for this water in their designs, having already realigned the entrance road, and missing the chance to improve the highway drainage whilst doing so. A local spring has also changed course and is causing continuous damage to the adjoining highway "North Road West".

19) The nature of the application, with only outline permission requested for the majority of the B1 offices, means that neither CBC, nor residents can have confidence that the proposals placed before them are transparent or coherent, and that the applicant will not subsequently reapply to adjust the proposals once he has secured permission for A and D class development on the site, as he did for BMW.

20) The proposal is not appropriate development in the Greenbelt.

21) The development does not pass the sequential test because The Reddings area is not recognised in the policies retained in the Local Plan. The former BMW site on Tewkesbury Road (now a Lidl & Starbucks) is nearing completion. Do we need another supermarket or coffees shop? The large Wholefoods and Baileys sites are now vacant. Paragraph 27 of the NPPF clearly states that if the sequential test is failed, permission should be refused. The sequential test is undoubtedly failed. The applicant's comments retarding North Place are speculative.

22) It is clear from the applicant's own economic analysis that a combined loss of turnover to Morrisons, Asda and "other" local stores of £6.89m will occur. That represents existing jobs and shops in the local community that will be lost. £6.89m is 60% of the projected total turnover for the new Aldi. At best the job losses will be translated to equivalent jobs at Aldi. Statistically, however, it is fair to say that only 40% of the jobs projected for the proposed Aldi will be new jobs. That said, as the whole economic analysis is based on trade diversion, the balance of new jobs at Aldi must also relate to jobs lost elsewhere in the county. This "trade off" will not occur if the applicant builds the B1 offices that he already has permission for.

23) The draft unilateral undertaking by the developer on the previous application does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.

24) There are so many flaws in this application that we are surprised that it has been brought forward for consideration, when the previous application identified that only some of the worst aspects of the initial application had been adjusted over the course of several amendments in 2017. The current application makes only minor cosmetic changes and still fails to properly address the concerns that were raised in the previous application.

TRRA believe that our community, and Cheltenham, deserves the right solution in line with the visions of the emerging Local Plan. Precious Greenbelt has been sacrificed for this B class employment land site. For that to have happened just to make way for more coffee shops and supermarkets would be wrong and we find nothing to support the applicants advocacy for same in the facts of this matter.

We urge you to reject this application and thank you for your time and consideration of our submission.

The Reddings Residents' Association

Comments: 11th June 2018

Further to the summary of our comments, which we posted on the public comments of the CBC website for the above application, we enclose herewith our complete report (see Documents tab).

Please would you add it to the comments section, or documents section.

The foregoing also refers to our illustrated report of March 2017 which relates to the previous application but is relevant to this also (available on line).

Comments: 17th September 2018

We understand that the Case Officer is expecting further plans that are anticipated to remove the existing proposed Costa, replacing this instead with B1 Office Space.

We understand that the applicant is making these changes to overcome criticism that the scheme is not a B-Use led scheme.

This would not be a minor variation.

We seek confirmation that CBC will be initiating a re-consultation on any such new plans that are submitted, to do otherwise would be contrary to the laws of natural justice.

We would be pleased to hear from you with confirmation.

Further comments from TRRA included under 'Consultations' in the officer report.

3 Caine Square
Cheltenham
Gloucestershire
GL51 0GB

Comments: 8th October 2018

As before prior to this application being 'revised' my objections are:

1. Nurseries are closing across the county. The need for a new one is unnecessary.
2. There are two supermarkets within a very short distance of this site. There cannot possibly be a further requirement for another. All this serves to do is dilute the current customer base which is an unnecessary strain on the supermarkets we already have. Other companies are closing supermarkets especially where there has been an amalgamation of chains. We are then left open to empty supermarket buildings.
3. There is unused office space all over Cheltenham and in particular in fairly close proximity to this site behind the Nuffield Hospital.
4. The one thing sadly lacking in this area and which would alleviate many problems is the lack of parking for people already working in this area in GCHQ, Ultra Electronics and BMW (where employees are not permitted to park on site!) Parking should somehow be provided for these employees. A satisfactory solution would be for an amalgamation of these large businesses purchasing the land jointly and providing parking for their employees and thus removing the

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necessity for the Park and Ride to be farmed out for this purpose. This is not what it was intended for. When offices are built there should also be a plan in place to accommodate the staff working there. When the plans for the West Cheltenham development are put in place (if not already there) you will just be pouring more and more vehicles and people into a saturated area with no thought for where these people will park.

I'm not sure I anticipate this being turned down again as our council and planning office currently seem to have their own best interests at heart and not those of the people of Cheltenham. Basically we can all talk until we are blue in the face and our council (which I did not vote for) will just do as they please.

2 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 13th June 2018

I have lived in this area for the last 18 years and enjoy walking in preference to driving a car. In that time there has been a huge increase in the amount of traffic using Hatherley Lane and the roundabouts at Arle Court. It is now no longer possible to find spaces in the Arle Court Park and Ride so I chose to walk and ride. However, with the huge increase in traffic since the Asda, B and Q and the recent BMW development walking and crossing roads to get to the Park and Ride is becoming more hazardous and the quality of air is becoming more and more toxic.

The proposed development on the Grovefield site includes a nursery for pre school children.

If the nursery is built in an area which is already congested with traffic are we not in danger of inflicting a potentially damaging cocktail of carbon monoxide, nitrous oxide and hydrocarbons on vulnerable young lungs?

Studies have already suggested vehicle pollution can exacerbate asthma. I feel strongly that the impact off air pollution in this area of Cheltenham is not being seriously considered by the council.

Do we really need another supermarket when the existing Cheltenham Aldi has been expanded and there is to be a new Lidl. We already have an Asda, Morrisons and Home Bargains and these stores do not appear to be running at full capacity.

We have a large number of coffee shops in and around Cheltenham. There are coffee shops at Asda and Morrisons, KFC drive through and at the Harvester. Do we really want to encourage more traffic coming off the M5 to use the proposed Costa drive through facility.

I hope that you will listen to the many concerns that the residents in this area of Cheltenham have before approving planning permission for more retail and residential developments on the west side of Cheltenham.

Comments: 5th October 2018

Having previously objected I am writing to confirm my continued objection of the revised plans.

I would like to object to the planning proposal for several reasons:

1. The proposed development would increase traffic flow and pollution. It will significantly impact upon traffic issues already present in that area. The current road infrastructure around the area cannot support this significant development.

The traffic at peak times is already intolerable and roads, which are not suitable for heavy traffic, are being used as 'rat-runs' to skirt around the main roads. There is already too much traffic on

Grovefield Way during rush hour (often with long queues to the roundabout with Hatherley Lane). With an additional supermarket there will delivery lorries and more weekend and evening traffic around this location.

2. Whilst cars are stuck in a traffic jam with engines idling there will be a significant build-up of fumes in the vicinity making it especially unsuitable for a day nursery to be built in the vicinity of a supermarket car park with the constant stream of traffic in and out. A nursery should never be located close to large roads including the motorway due to the high level of air pollution.

3. Another supermarket would divert custom from other local options of Asda, Morrison's, Spar and Home Bargains. As there is plenty of supermarket provision and office space in the area already, there is no reason for this development on greenbelt land.

4. There is already inadequate parking for the Park and Ride, and employees from BMW and GCHQ and they are parking on local residential streets.

5. There are still unused offices available at Pure offices.

Sycamore Lodge
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 26th September 2018

I strongly object to this proposal on multiple grounds.

Firstly, there is simply no need for a development of this nature; there are already two supermarkets in close proximity offering ample low cost choice, and a home bargains store. This is not an area of low employment requiring the creation of job opportunities in the immediate vicinity.

There are also several well-advertised vacant office units, showing there are is not sufficient demand for more office space in the local area - the units already in the close area are not fully let, or oversubscribed. There is also brownfield sites available close by that could be developed for office use in the unlikely event this was required.

Secondly, this is a horrific example of urban sprawl, where greenbelt is being eroded, and totally unnecessary development for nothing but profit is put on valuable green space to the detriment of local residents who clearly do not want it.

Lastly and most importantly is the concern regarding the traffic and total inability for the local infrastructure to cope with the additional vehicles that will come with this development? There is already too much traffic on the surrounding roads and roundabouts - the survey conducted is out of date, and traffic during peak time is quite literally bumper to bumper. Further cars (this is not well connected for any other means of transport) will result in catastrophic levels of queues, pollution and parking for local residents. It will also mean other local roads are used as "rat runs" - roads that are not designed for regular or heavy traffic and this is already a dangerous issue that will worsen with the risk of collisions as people leave blind driveways constantly.

I am baffled as to how an application like this has even got this far, when it is neither needed, wanted, nor safe for the residents or environment.

10 Frampton Mews
The Reddings

Cheltenham
Gloucestershire
GL51 6UG

Comments: 13th June 2018

There is already heavy traffic on Grovefield Way, with frequent queues to the Arle Court Roundabout. This development will make this much worse.

Additionally, as this site is close to Asda and not far from Morrisons, there seems no requirement to have yet another supermarket on this side of town.

Comments: 1st October 2018

I would like to object to the proposed development for several reasons:

1. There is already too much traffic on Grovefield Way during rush hour (often with long queues to the roundabout with Hatherley Lane).
2. There is already inadequate parking for BMW employees, and they are parking on local residential streets and even on Grovefield Way.
3. There are already an adequate number of supermarkets with both Asda and Morrisons nearby.
4. There are no plans to landscape the area to make it look attractive for local residents and those passing by.
5. There looks to be inadequate provision for water drainage to prevent local flooding.

25 Timperley Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3RH

Comments: 15th June 2018

Letter attached.

9 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 12th June 2018

The revised application does not address any of the concerns that I have already expressed regarding the initial proposal, and I continue to object on the same grounds, namely:

1. It is a further extension to an unnecessary retail development on green belt land. The greenbelt boundary must not be amended and the greenbelt status must not be lifted from this site
2. There is no landscaping to make the site in keeping with what should be a village area of Cheltenham
3. An increased serious flood risk and increased surface water levels - we are already seeing that from the BMW site

4. It will cause an increase the amount of traffic around The Reddings exacerbating existing gridlock problems on Grovefield Way and surrounding roads.

Despite all of the promises that were made by the council regarding no serious impact upon the local traffic flows when Asda and the B&Q developments went ahead, the Reddings area suffers considerably from increased traffic with serious congestion problems at the B&Q roundabout during the evening and morning rush hours.

This is exacerbated now by the number of cars using the Reddings as a 'cut through' presumably to avoid traffic on the A40. The proposed development will add even further to the already horrendous congestion in the area, together with the increase in traffic noise, pollution, and a greater risk of traffic accidents. Furthermore the infrastructure is going to be under more strain - the roads leading to the proposed development are insufficient for greater traffic numbers. We already have serious problems with potholes in the area which can and will get worse.

There is also the additional problem of parking. This is insufficient in the proposed development and will likely result in workers using the surrounding roads for parking. This will cause serious annoyance and inconvenience to local residents. We already have this problem with workers from BMW nuisance parking in the local roads. With this development it will be far worse!

5. An increase in traffic noise, as well as additional light pollution and further reducing air quality

6. There is no need for a further supermarket in the area, we have two already.

7. There is no need for a further Costa - there are already 12 Costa Coffee outlets in Cheltenham

8. A B1 development plan for this area already exists. Furthermore the existing plan addresses the above concerns.

9. Some of the reports used in the application are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.

10. The Local Plan is not yet finalized, and the Retail Plan is not written. This application is not consistent with either.

11. This proposal is contrary to the current retained Retail Plan.

12. The reports were drafted before the current editions of the Local Plan and JCS.

13. There are no exceptional circumstances to permit this proposed development within the greenbelt. We should not be readily concreting over our precious countryside with the accompanying loss to wildlife, habitat. It is something that the Council should be acting as custodians over with the aim of preserving it for future generations. Once gone, it will be gone forever. The Council should not be rushing to leave that as it's legacy.

Comments: 1st October 2018

I note that the plans now include removal of the Costa and replacing it with B1. However, I agree entirely with the Residents Association that the "indicative" statement gives no form of permanence or commitment. I have no doubt in my mind that a variation application will be made to convert the unit back to a coffee shop once permission for the remainder of the site has been granted.

I further agree with the Residents Association that if the letters of intent which have been submitted by potential office occupiers have no contractual basis, then there is absolutely no guaranteed, binding commitment for that to be manifested once planning permission has been granted.

Cheltenham Borough Council has too readily allowed previous planning applications with grandiose airy promises that there will be for example no serious effect on traffic in the area (you try getting out from Grovefield Way to the A40 during peak hours nowadays!), or significant drainage problems (BMW development already causes flooding and overspill into the local roads!), so for the Council to say that all will be well on the basis of non-contractual letters of intent is something I would take with a considerably large pinch of salt!

The revised application does not address any of the concerns that I have already expressed regarding the initial proposal, and I continue to object on the same grounds, namely:

1. It is a further extension to an unnecessary retail development on green belt land. The greenbelt boundary must not be amended and the greenbelt status must not be lifted from this site
2. There is no landscaping to make the site in keeping with what should be a village area of Cheltenham
3. An increased serious flood risk and increased surface water levels - we are already seeing that from the BMW site
4. It will cause further increase the amount of traffic around The Reddings exacerbating existing gridlock problems on Grovefield Way and surrounding roads.

Despite all of the promises that were made by the council regarding no serious impact upon the local traffic flows when Asda and the B&Q developments went ahead, the Reddings area suffers considerably from increased traffic with serious congestion problems at the B&Q roundabout during the evening and morning rush hours.

This is exacerbated now by the number of cars using the Reddings as a 'cut through' presumably to avoid traffic on the A40. The proposed development will add even further to the already horrendous congestion in the area, together with the increase in traffic noise, pollution, and a greater risk of traffic accidents. Furthermore, the infrastructure is going to be under more strain - the roads leading to the proposed development are insufficient for greater traffic numbers. We already have serious problems with potholes in the area which can and will get worse.

There is also the additional problem of parking. This is insufficient in the proposed development and will likely result in workers using the surrounding roads for parking. This will cause serious annoyance and inconvenience to local residents. We already have this problem with workers from BMW nuisance parking in the local roads. With this development it will be far worse!

5. An increase in traffic noise, as well as additional light pollution and further reducing air quality
6. There is no need for a further supermarket in the area, we have two already.
7. A B1 development plan for this area already exists which addresses the above concerns.
8. Some of the reports used in the application are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.
9. The Local Plan is not yet finalized, and the Retail Plan is not written. This application is not consistent with either.
10. This proposal is contrary to the current retained Retail Plan.
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12. There are no exceptional circumstances to permit this proposed development within the greenbelt. We should not be readily concreting over our precious countryside with the accompanying loss to wildlife, habitat. It is something that the Council should be acting as custodians over with the aim of preserving it for future generations. Once gone, it will be gone forever. The Council should not be rushing to leave that as its legacy.

Amity
78 Redgrove Park
Cheltenham
Gloucestershire
GL51 6QZ

Comments: 28th May 2018

Traffic system in the area is at breaking point due to volumes of vehicles. There isn't even 2 lanes or traffic lights from the B&Q roundabout towards Arle Court and this creates potential accidents everyday.

In the last 15 years the following have been built: care home, hotel, KFC, Asda and BMW as well as 500 homes with no road widening or improved access to the A40. There is another care home being built which will create yet more congestion off hatherley lane and pollution and traffic noise continue to increase.

We already have the poorest air quality in cheltenham in this area too.

Crossing hatherley lane has become increasingly dangerous for pedestrians and the pavements are narrow.

Noise and litter have increased greatly in the area and if this commercial enterprise gets the go ahead we will be looking at gridlocked roads, further noise, litter, buildings blocking views and no privacy for those living nearby as well as traffic and light pollution.

We have 2 large supermarkets in the area and there are beverages available at both of these as well KFC, Harvester and several local pubs. Offices are still left empty by Asda and there are several nurseries therefore, there is no need for any of the amenities being proposed in our already saturated local area. These plans would be better placed in an industrial or commercial area.

Comments: 29th May 2018

Traffic congestion means the roads around B&Q are at breaking point with near misses everyday due to cars making two lanes out of one as the road is not wide enough and the amount of vehicles ever increases.

There are already sufficient amenities in the area x2 large supermarkets with petrol stations, 3 local pubs and several nurseries.

In the last 15 years the area has become a largely retail/ commercial area with 2 care homes, Asda, B&Q site, hotel, KFC. and around 500 homes. Offices next to Asda are empty.

There has been no road widening or signalling at the Arle court roundabout which is now critical. A slip road onto a40 would help to ease congestion for daily commuters.

Our area has the poorest air quality in cheltenham due to all this development and along with traffic pollution and noise there is light pollution and increased litter.

Paths along Hatherley Lane are narrow and have overgrowing vegetation and it is becoming increasingly difficult to cross the road at any time of day due to traffic. This is not helped by the parked cars near the C2 Church area as there are only some yellow lines which could be extended both sides to prevent dangerous parking.

Instead of more development of a commercial nature, a large, low level multi storey car park could be used by both workers from GCHQ and other companies in the area as well as the park and ride to remove inconsiderate and dangerous parking on residential roads.

This proposal would be better suited in an out of town industrial retail park setting.

Comments: 5th October 2018

As there appears to be a server error when trying to leave comments on the CBC website, I am emailing as advised instead.

Objection to this planned development:

There are numerous reasons for this:

1) What about the weekend and evening traffic that the Aldi will generate on Grovefield Way? The applicants transport analysis predicts up to 282 vehicle arrivals and departures every hour for much of the weekend, all into a carpark with a maximum of 102 car park spaces.

Roads are gridlocked for hours per day already. With accidents and near misses on the B&Q roundabout where vehicles make 2 lanes when there is effectively one.

One idea is the land could be used as a slip road onto A40 thus easing congestion and gridlock at both B&Q and Arle Court roundabouts.

Lanes need widening at Arle Court and traffic lights installed even a hamburger lane like Elmbridge Court.

Parking is a major issue already in the area with both BMW, GCHQ and other companies workers using the park and ride site and residential roads even parking on grass verges all free of charge. On Hatherley Lane there needs to be double yellow lines all the way from Asda to Robert Burns Avenue as cars are constantly swerving around parked vehicles.

A better use of the space would be a multi storey car park where local workers would park and generate revenue and also provide more park and ride spaces.

We need no waiting yellow lines on roundabout areas of Grace Gardens and Redgrove Park as even now cars block the road waiting in traffic and residents are not able to access their estates.

In the last 15 years all the development in the area including approx 500 homes has left the road infrastructure unable to cope with no significant improvements made local residents are having to endure gridlocked traffic for hours each day.

This will get even worse with the approx 400 Redrow homes being built and the new secondary school.

2) What provisions are being made to reduce fume pollution? As the area has already been found to be most polluted in Cheltenham this year.

3) Is it safe for young children to be in a nursery, up to 12 hours a day, in the middle of a carpark, next to the Aldi & office car parks, BMW garage, the congested Grovefield Way, A40 & M5, breathing in fumes?

4) What measures are in place to control noise pollution from air conditioning plant on offices, shops, etc., the new queuing traffic, the reversing sirens of delivery lorries?

5) How is light pollution to nearby houses to be controlled?

6) What opening hours are actually proposed, because none are given.

7) When will deliveries be made? Will it be early morning, or late at night and wake me, or my children up?

8) How does the economic argument to build Aldi & create 26 jobs compare to being able to create 118 more jobs in an office of the same area? There are empty offices by Asda. We already have 2 supermarkets, a spa shop and co op in the area there is no need for another supermarket and offices in the area.

9) Where will all the wildlife go when the proposed planting will be non-native species and very small when planted.

It is disappointing the developers can keep putting in for planning when they have already been turned down several times and there are so many objections being registered.

7 Redgrove Park
Cheltenham
Gloucestershire
GL51 6QY

Comments: 13th June 2018

We would like to reemphasize the following points.

1. Traffic The junction of Grovefield Way and Hatherley Lane is seriously congested at both the morning and evening rush hours. From Arle Court roundabout along Hatherley Lane there is heavy and near stationary traffic into town making exits from Grace Gardens, Redgrove Park and Robert Burns Avenue difficult and sometimes dangerous. Similarly from the junction of The Reddings with Grovefield Way the road is heavily congested in both directions at both morning and evenings. And this is BEFORE any of the presently proposed development has any further influence.
2. Excessive development. The proposed development duplicates facilities which are already in plentiful supply in all parts of Hatherley, both in retail opportunities and food outlets.
3. The need (if any) is for residential, not commercial property.

8 Appleton Avenue
Cheltenham
Gloucestershire
GL51 6TS

Comments: 15th June 2018

The previous objections from myself still stand regarding the proposal to build on the green belt site adjacent to North Road West and Grovefield Way. I wholeheartedly support the objection submitted by The Reddings Residents Association. We have supermarkets, coffee shops, children's nurseries and offices nearby and do not need any more buildings. The proposed development will cause significant increases in pollution, noise, light erosion and traffic congestion which is severely detrimental to the local area and its residents. Trusting you will take ALL objections into consideration and reject this proposal.

I most strongly want to object to the proposed development reference no. 18/01004/FUL.

In this area we have plenty of supermarkets, plenty of places to have coffee, adequate nurseries, empty office buildings by the side of Asda, also numerous empty offices in Cheltenham and so have I have not seen the office buildings been taking up in the white boarding area by Asda suggesting there is no further demand for anything.

Another severe problem is the volume of traffic this disaster will bring into the area. Congestion at the moment is unacceptable at peak time along Grovefield Way and the surrounding area. With all the proposed buildings there will be constant movement of traffic, loading/unloading at all times of the day/night. This is adjacent to residential properties and will negatively impact the lives of residents with noise and light disturbance and pollution. I could not see anything in the proposal that addresses any of this with amendments or new infrastructure elements.

I would suggest as existing demand is not being fulfilled (evidence of land by ASDA) then that is factual and shows no demand for anything extra to be built on this site

6 Roxton Drive
Hatherley
Cheltenham
Gloucestershire
GL51 6SQ

Comments: 14th June 2018

I note that Cheltenham Borough Council's planning website is out of action and so I am sending my feedback on the Grovefield Way development application by email instead.

I would ask that you add this to the website when it is functional once again.

You may find it reasonable to extend the deadline for public feedback as your technical issues will have prevented many concerned residents from logging their feedback.

This site (Grovefield Way) is not an appropriate site for a retail development. It is not 'out of town' it is adjacent to domestic properties which will be significantly impacted by retail activity. Unlike a B1 office, for which I believe the site has previously been granted permission, retail sites have constant traffic flow, out of hours deliveries, and they attract and encourage people to hang about (and may therefore attract trouble.) This application goes so far as to suggest that having people sitting drinking coffee outside at up to 11pm will be a good thing for the community.

Unless you live in it and are trying to enjoy peace and quiet in your own home.

With a large number of retail outlets in town closing and with a large supermarket (Asda) literally just around the corner, the building of another supermarket retailer seems completely unnecessary. It will only leach business from existing outlets and not create new demand, and is therefore far more likely to cost local jobs than it is to provide them.

It is quite possible that all it would do is move jobs from the Tewkesbury Road side of town to this side of town - in cars, adding to the traffic and parking issues in this area.

Cheltenham Borough Council have failed to address the issues caused by the same developer's failure to provide parking or adequate site drainage on their adjacent BMW site. Flooding is now a significant issue locally and there is no indication that the new development does anything other than exacerbate that.

There is wholly inadequate provision for parking. If the retail units and offices are built, and if they are as successful as the developer suggests, then they will generate significant vehicular traffic. The offices will add to the peak flows (already significantly congested in the morning and evening) and the retailers will add traffic of the same flow profile as Asda, B&Q etc ... just around the corner, but accessing the wider community via the same small roundabout bottleneck to the same Arle Court roundabout. The road infrastructure in this locality is already not coping. Adding this extra load will significantly worsen journey times for local residents (and the unfortunate

customers of these proposed businesses.) I do not see anything in these proposals which would ease this congestion.

There do not appear to be any restrictions imposed on hours of business or the hours of delivery to retail units. Asda has been permitted to deliver 24/7 and now regularly wakes up its residential neighbours in the early hours of the morning. Aldi, Costa Coffee etc will do the same if you permit it. They will significantly impact the health and quality of life of their residential neighbours - in breach of the Borough Council's own promise in the Cheltenham Charter that we can expect to enjoy a healthy life, having positive relationships at home and with the wider community and enjoy the benefits of a sustainable built and natural environment.

This plan is largely unchanged from its predecessor which was quite rightly turned down. The developer has made no attempt to address the concerns of the community about this proposal, or their current Cotswold Motor Group site. The Borough Council cannot, in good conscience, say that there is any substantial change that warrants this application being passed. It must decline the application and should instead devote its resources to enforcing reasonable behaviour from its corporate citizens and fulfilling its duty of care to the people who live in the borough.

Avonleigh
Branch Road
The Reddings
Cheltenham
Gloucestershire
GL51 6RP

Comments: 12th June 2018

Yet again, I wish to reiterate my objection to the revised plans. I object to the proposed development which is on Green Belt as designated in the Cheltenham Borough Local Plan.

There will be a further increase in traffic, exacerbating the existing problem of peak time congestion and associated noise and air pollution. The current infrastructure has not been designed to support this type and size of development.

Since the last application a Cyber Technology Park is being proposed next to GCHQ. This will no doubt increase the pressure on an already weak infrastructure.

This plan does not appear to support the intention of the original application of B1 development. The Planning Inspectorate commented about a previous application that the land could only be used for office development. The need for more offices should be weighed against the empty land space adjacent to the Asda supermarket.

In my opinion, there is no need for another supermarket, drive-thru outlet or office accommodation.

This development would also lead to a loss of habitat for a wide range of wildlife.

This development makes no improvement to the local footpath infrastructure and connectivity at the A40/M5 intersection and Badgeworth Road. An ideal opportunity wasted.

Comments: 7th October 2018

I wish to reiterate my objection to the revised plans and fully support the extensive investigations and findings of The Reddings Residents Association.

The further increase in traffic will exacerbate the already existing problem of peak time congestion, together with the associated noise and air pollution. The current infrastructure has not been designed to support this type and size of development.

There is no need for more office space as the land adjacent to the Asda supermarket still remains undeveloped.

In my opinion, there is no need for another supermarket in an area that is already well served by 6 of the largest within a 3.1 mile radius.

This development would also lead to a loss of habitat for a wide range of wildlife.

This development should include plans to develop and integrate a footpath network to improve access to the existing footpaths under and around the A40/M5 intersection and airport.

White Lodge
Hatherley Lane
Cheltenham
Gloucestershire
GL51 6SH

Comments: 12th June 2018

I do not see the need for another supermarket in the area. Office space is already plentiful. There may be a need for a day nursery, but surely this is not the right environment for one, too many vehicles in the area and just off a very busy road. Traffic would be increased again, with more articulated vehicles. The traffic on the road outside my front door at the moment is constant from 06.30am to approx. 19.30pm Monday to Saturday. Articulated vehicles mounting the grass very close to my fence when they try to turn left to go down the A40, not enough road space for them. The pollution is horrendous, my window frames get a black covering of dust within a few weeks of cleaning, caused by stationary vehicles, engines running, also the vibration is not helping the structure of the property. So no to more traffic.

March Winds
North Noad East
Cheltenham
GL51 6RE

Comments: 13th June 2018

I am very concerned with the proposed planning application for the following reasons.

The traffic at the roundabout by B and Q is already at a bottleneck at both morning and evening rush hour. It is very congested now but would undoubtedly get worse if the development goes ahead, creating noise and air pollution in an area that already suffers due to the close proximity of the A40.

We currently have cars parked on North Road East every day during the working week from the developments that already exist. Often the parking is inconvenient for residents getting in and out their property. I am worried that the parking on residential roads near the proposed development will increase.

I am dismayed by the thought that this development, if it is created, will be open until late at night, creating even more noise pollution as well as possible light pollution.

I am strongly against the continued development on Greenbelt land, particularly when there are brownbelt sites that could be developed.

The BMW garage is a visual monstrosity and it is a shame that it is one of the first things that you see when entering historic Cheltenham, a further development can only look worse.

We do not need another supermarket right next to Asda, we do not need more offices when there are many standing empty by Asda.

6 Grace Gardens
Cheltenham
Gloucestershire
GL51 6QE

Comments: 11th June 2018

My previous comment of 2017 still stands.

i strongly oppose the proposed building ideas. I was at the council meeting when the developers failed miserably and the plans were rejected. how they could have the cheek to submit them again when they failed so badly.

I have lived in grace gardens for nearly 19 years and seen the lovely green area built on. I cannot get out of my road in the busy times in under 3 minutes waiting for the endless stream of cars to pass.

The b and q roundabout is a joke to get across and worse still is the roundabout by kentucky and the Jurys hotel.

we do not need an Aldi we have one in town. we do not need a costa and certainly a large nursery school is not wanted.

Strongly object

Comments: 5th October 2018

This is the 3rd time I have objected to this proposal and all I have said before still stands. It is the most ridiculous plan I have ever heard of. No one wants an Aldi Costa or a nursery causing extra traffic disruption on grovefield way. The current bmw garage looking like a liner docking at night. The amount of pollution it will cause is enough to make me and others move from Cheltenham. I do not want this building proposal.

Lynwood
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 8th June 2018

I am very concerned about this application and have the following points in objection to it.

This land was originally Green Belt, and woefully the council have allowed to be developed. I wish very much that this had not happened, but as it has been, it is vital that any development should be sympathetic to the local environment.

The application is significantly 'over-developing' the site. I agree with other comments that there is no need for another supermarket and a drive through facility - we've got them already. The council should be encouraging retail to use the town centre and the new developments that are

happening there. This type of facility would increase traffic, noise and light pollution to unacceptable levels.

Regarding the office buildings and childcare, this too will cause additional traffic on Grovefield Way which is already terribly congested at peak times. So much traffic now uses this road to gain access to the A40 that the access to Arle Court roundabout really needs adjusting. Possibly traffic light controls should be installed for this entry (at present the traffic lights are only on the A40 itself) or some way of creating a flow lane so that traffic can get directly onto the A40 and to the motorway. Maybe it would be practical to have access to the site directly via the A40.

The parking suggested for the development does not seem enough. Although there are bus routes along the A40, this is only going to help people to get to work if they can easily get to a bus stop at the other end. Otherwise they will come by car, and if they can't park on-site, they will park on surrounding roads. This is amply evidenced by the parking around GCHQ, which doesn't have enough parking for their staff. The park & ride facility is now completely full by around 10am. So more parking would have to be allowed for. This will create further congestion on surrounding roads and loss of amenity for the residents.

It's dreadful to see the high building of the BMW development from our house where once we saw rural landscape. This has changed the rural aspect of the area and any further development will make it worse.

The noise from the A40 has significantly increased since the trees were 'thinned' along the side of the A40. Some visual and audio screening is vital, both to baffle the noise of the A40 and to screen the development itself. The A40 should be laid with surfacing that minimises vehicle noise.

I'm concerned that more hedgerow would be removed - hedgerow supports our wildlife and is shrinking at an alarming rate. The BMW development has already removed far more hedgerow than the plans seemed to show. We need to protect hedgerow and the associated wildlife.

Thank you for reading these comments, and I hope you will take these into consideration.

Comments: 7th October 2018

I am very concerned about this application and have the following points in objection to it. This land was originally Green Belt, and was allowed to be developed for exceptional circumstances - to provide office accommodation. It is vital that any development should be sympathetic to the local environment.

The application is massively 'over-developing' the site. I agree with many other comments that there is no need for another supermarket - supermarkets are close by already, plus food in Home Bargains, and the shop in The Reddings. The council should be encouraging retail to use the town centre and the new developments that are happening there. This type of facility would increase traffic, noise and light pollution to unacceptable levels. I cannot see any justification for a supermarket - it is not wanted or needed and will create only a small number of jobs compared with the office building that could use the site - and which is what the original planning officer envisaged.

Regarding the office buildings and childcare, this too will cause additional traffic on Grovefield Way which is already terribly congested at peak times. So much traffic now uses this road to gain access to the A40 that the access to Arle Court roundabout really needs adjusting. This will create further congestion on surrounding roads and loss of amenity for the residents. Possibly traffic light controls should be installed for this entry (at present the traffic lights are only on the A40 itself) or some way of creating a flow lane so that traffic can get directly onto the A40 and to the motorway. Could it be practical to have access to the site directly via the A40? This would reduce congestion on local roads.

The parking suggested for the development does not seem nearly enough. Although there are bus routes along the A40, this is only going to help people to get to work if they can easily get to a bus stop at the other end. Otherwise they will come by car, and if they can't park on-site, they will park on surrounding roads. This is amply evidenced by the parking around GCHQ, which doesn't have enough parking for their staff, and along Grovefield Way cars are already squeezed onto bits of tarmac along the green verge. So more parking would have to be allowed for in the plans.

The noise from the A40 has significantly increased since the trees were 'thinned' along the side of the A40. Some visual and audio screening is vital, both to baffle the noise of the A40 and to screen the development itself. The A40 should be laid with surfacing that minimises vehicle noise. Surely it is not too late for sound insulation to be improved by more planting, which will improve visual, noise and light disturbance. This will also help to maintain conservation and the wildlife on the site. We have already lost precious hedgerow and we should not lose any more - this is vital to wildlife.

Light pollution is a real concern as the proposed supermarket would be likely to be open outside of office hours - in fact it would have to be to make it economically viable when it is competing with the other local supermarkets.

Flooding is already a problem with the current BMW development. Water has seeped through the tarmac on the road surface on North Road West. This is extremely worrying, and should be fully investigated before any further development is allowed.

I appreciate you reading my comments, and I hope you will take them into consideration.

Fernleigh
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 11th June 2018

This 'new' application, fielded at the same time as the appeal against the previous refusal is just another piece of 'smoke and mirrors' from the Hinton Group.

Nothing has changed from the earlier, rejected application and my previous objections remain.

In short;

1) The infrastructure around the Reddings cannot handle a retail park (the offices will remain empty and Hinton will then attempt to change all the units to retail in time). Neither the A40, Grovefield Way, The Reddings nor Hatherley Road will cope with the huge amount of additional traffic generated by retail on this site.

2) BMW has already increased flooding in the area and the magical aquifer they claimed would negate this simply hasn't happened. This development will make flooding even worse.

3) Noise, litter and anti-social behaviour will all become issues in the area.

4) Light pollution and affect on Wildlife - birds around BMW are tweeting when they should be asleep! The affect on wildlife in the area will be devastating.

5) Development in the Greenbelt is granted in exceptional circumstances. Another Aldi and Cheltenham's 400th Costa are not exceptional circumstances.

6) There is no need. These facilities are provided elsewhere. The office space around the back of Asda remains empty so why do we need more offices here??

7) It won't increase B1 employment significantly.

8) Pollution. Standing traffic and increase in movements (Hinton's estimates are ridiculous!) will vastly reduce the quality of air in the area.

9) The goes against local and national planning.

10) BMW employees are causing parking issues around the area. This will make that worse and local government seem to take no interest in helping matters here. Compliance have no teeth and wash their hands once something is through.

It is a terrible plan. It isn't needed or wanted. It will be so bad for the local area. It must be rejected.

Comments: 5th October 2018

As the application has not significantly changed, I stand by my earlier objections. I also fully endorse the comments made by TRRA, who work to represent the voice of the community and raise the key issues which are often missed elsewhere.

My concerns are as follows:

Pollution caused by a significant increase in traffic. Grovefield Way is already subject to standing traffic, which has been made worse by BMW. This will hugely exacerbate the problem. I certainly won't be sending my little ones to a nursery on such a site! I don't believe it responsible to have a nursery on a site with frequent traffic movements, and poor air quality.

Traffic will hugely increase, not only on Grovefield and Hatherley Road, but along the Reddings, which already suffers speeding and over use as a 'rat run'. Retail on this site will make the Reddings suffer a constant flow of traffic. It won't cope.

Wildlife and ecology. Natural hedgerows will be lost. Sparse non-native planting will fail to replace the habitat lost due to this development.

Troubling concerns are evident due to delivery times and a lack of clear opening times.. How long before a 24 hour Aldi is on the site?

Light pollution.

Noise pollution.

The traffic reports seem woefully out of date.

Is retail in the greenbelt necessary? I think not.

Not needed. There are already empty offices on the Pure Offices site and there is provision for local businesses elsewhere. We have three other supermarkets in the nearby area.

Inadequate parking. This is already a massive problem which sees on street parking around the area. This will get worse.

Risk of flooding.

This won't lead to a dramatic increase in jobs.

Existing permission is for B1 use not retail.

Thank you.

8 Old Reddings Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SD

Comments: 18th June 2018

Letter attached.

Comments: 8th October 2018

We totally object to the second application for the proposed development on the Grovefield (BMW) site.

An important concern as Reddings residents is the projected lack of car parking spaces for employees and customers, to be provided for a supermarket site on a busy road that becomes congested during rush hours. This is only a stone throw from the ASDA supermarket.

The BMW site is a prime example of a business with inadequate parking for its employees and customers, resulting in employees using the Park and Ride, nearby residential roads and gateways to local fields. Because of the exceptional storage of new vehicles, this site is already being known as the "Mini Dump".

Further development of the site with inadequate parking facilities for business and retail outlets will only exacerbate the situation, adding to the current parking problems caused by the BMW site, and creating a dangerous single access situation from an increasingly busy road, with further developments on the road being muted.

As long time residents, we ourselves have suffered badly from an indiscriminate and badly thought out example of a garden grabbing development with an inappropriate means of access, resulting in parking problems.

Nearby Hatherley Lane suffers from parking on a dangerous bend by local business employees, who cannot park on their business premises

We urge CBC Planning Department to totally reject this inappropriate development for the above reason and multiple other concerns regarding pollution and annoyance to the residents of this residential area.

44 Robert Burns Avenue
Cheltenham
Gloucestershire
GL51 6NT

Comments: 22nd September 2018

I object to the proposed application on the grounds that it is not suitable site for such a development and is not required. We have Asda & Morrisons, and they are quite sufficient, they

also both have coffee shops. The traffic in that area is already very heavy with the Park & Ride, B&Q and the traffic from the Mini centre and Ultra. Hatherly Lane has also become a way of traffic avoiding the A40 and is always busy. But why does the council bother to ask we all know it is going to happen anyway.

25 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 4th June 2018
Letter attached.

3 Oakbrook Drive
Cheltenham
Gloucestershire
GL51 6SB

Comments: 7th October 2018
I object to part of the proposal. My concerns are:

- The supermarket component seems unnecessary given there is a large supermarket only yards away and another a short drive away. I fail to see the benefit to the community.
- I do not object to the office space generally (which may bring jobs), however I have concerns that the parking provision seems inadequate for the implied number of employees. This will almost certainly cause overspill onto the neighbouring roads. Parking provision is already an issue in this area and this will not help.
- There is no apparent plan to upgrade the roads which are extremely busy at peak times, particularly with vehicles getting to and from the motorway. There are massive queues on the A40 at 5pm every day and the B&Q roundabout is usually jammed. It seems there are opportunities to provide alternate access to the A40 from the site but these have not been considered.

Badgers Mount
Branch Road
The Reddings
Cheltenham
Gloucestershire
GL51 6RP

Comments: 14th June 2018
Summary

- 1) To be clear, we do not take issue with the B1 elements of the application nor the extant permission as a fall-back.
- 2) We and the vast majority of the 1000 households that it represents, the ward councillors, neighbouring residents' associations, businesses and parish council have previously objected

to the non-B class application. No comments in support of this application have been made to date.

- 3) As set out, we find a multitude of reasons why the application conflicts with policies, namely Retail, Local, Greenbelt and the NPPF.
- 4) Some of the reports submitted are now significantly out-of-date and use old, flawed data. The application remains confusing and is not transparent as to its intentions for the B1 development elements in particular.
- 5) The Local Plan is not yet finalised, and the Retail Plan is not written. This application is not consistent with either.
- 6) This proposal is contrary to the current retained Retail Plan.
- 7) The reports were drafted before the current editions of the Local Plan and JCS.
- 8) Objection reports were filed by other traffic and planning consultants in respect of the previous application. These refute many of the applicant's reports, conclusions and claims. The applicant reports in support of this application do not address them.
- 9) The traffic data is grossly out-of-date and the more recent survey is unreliable.
- 10) Air quality monitoring and objective, impartial assessment is required.
- 11) This proposal is very different to a B1-only proposal inasmuch as offices are likely to be operating at capacity 5 days per week, 08:00 to 18:00 hours with predictable traffic flows at finite periods. Retail will be 7 days per week, 05:30 to 23:00 hours with 24 hours per day intense lighting and very variable traffic flows all day and every day. Also, further light pollution from vehicle headlights shining into windows at all hours would occur.
- 12) Traffic was bad and is now very bad following the BMW being opened in August 2017. Traffic fumes are very noticeable due to the standing traffic and yet it is proposed to build a pre-school nursery in the middle of it. What of the health risks to the children, residents and drivers who are now in stationary traffic? How is this being assessed? The applicant fails to do so in the documents submitted. This was a significant concern for the planning committee.
- 13) Acoustic background noise from stationary traffic and deliveries and vehicle movements around the site will increase significantly compared to the extant B1 permission. The problem is compounded by the applicant having previously felled much of the tree and vegetation screening along the A40 and Grovefield Way to display their BMW building.
- 14) B1 is likely to create modal shift with local jobs for local residents. Conversely, retail will encourage journeys from out-of-town. As such, it is contrary to the NPPF.
- 15) If permitted, this will be the 15th Costa Coffee in Cheltenham. In this regard, the county is already a laughing stock. Costa will also encourage consumption of hot drinks whilst driving.
- 16) The applicant's projected full time B Class job numbers are misleading and use incorrect numbers.
- 17) The very special circumstances in 2007 were to permit the use of premier Greenbelt land for employment purposes with the creation of high value B1 jobs on a large site. The BMW development has already removed over 33% of the original site area available and created few, if any, new full time jobs. This proposal will take a further 12% of the site for non-B Class development to create 71 associated new full time jobs. However, that will be at a cost of 132, or more B1 jobs that would be created on the same 2448sq meters of the site. As such, the loss of B1 jobs to the retail/childcare A and D class proposal will remove a potential £588,000 per annum from the local economy compared to the equivalent B1 employment wages that would be generated by the extant B1 permission.
- 18) Altering the site contours and stockpiling of soil during the BMW development has altered the historic ability of the site to absorb storm water run-off from Grovefield Way. This is causing flooding to local houses. The proposed development must account for this water in their designs, having already realigned the entrance road, and missing the chance to improve the highway drainage whilst doing so. A local spring has also changed course and is causing continuous damage to the adjoining highway "North Road West".
- 19) The nature of the application, with only outline permission requested for the majority of the B1 offices, means that neither CBC, nor residents can have confidence that the proposals placed before them are transparent or coherent, and that the applicant will not subsequently reapply to adjust the proposals once he has secured permission for A and D class development on the site, as he did for BMW.
- 20) The proposal is not appropriate development in the Greenbelt.

- 21) The development does not pass the sequential test because The Reddings area is not recognised in the policies retained in the Local Plan. The former BMW site on Tewkesbury Road (now a Lidl & Starbucks) is nearing completion. Do we need another supermarket or coffees shop? The large Wholefoods and Baileys sites are now vacant. Paragraph 27 of the NPPF clearly states that if the sequential test is failed, permission should be refused. The sequential test is undoubtedly failed. The applicant's comments retarding North Place are speculative.
- 22) It is clear from the applicant's own economic analysis that a combined loss of turnover to Morrisons, Asda and "other" local stores of £6.89m will occur. That represents existing jobs and shops in the local community that will be lost. £6.89m is 60% of the projected total turnover for the new Aldi. At best the job losses will be translated to equivalent jobs at Aldi. Statistically, however, it is fair to say that only 40% of the jobs projected for the proposed Aldi will be new jobs. That said, as the whole economic analysis is based on trade diversion, the balance of new jobs at Aldi must also relate to jobs lost elsewhere in the county. This "trade off" will not occur if the applicant builds the B1 offices that he already has permission for.
- 23) The draft unilateral undertaking by the developer on the previous application does not offer adequate security that the whole site will not become a retail park by stealth. Indeed, on the applicant's own Design and Access statement it congratulates itself that "The offices have not been designed with an end user in mind, so the space created needs to adapt easily to changes in need or use. The buildings must be open plan, to allow for easy sub-division to appeal to a wide range of potential occupiers. Taking this approach ensures that the buildings will be versatile and adaptable, ensuring they will remain viable into the future". As such, the architecture and style of the offices that they propose to build can easily be converted to retail in the future.
- 24) There are so many flaws in this application that we are surprised that it has been brought forward for consideration, when the previous application identified that only some of the worst aspects of the initial application had been adjusted over the course of several amendments in 2017. The current application makes only minor cosmetic changes and still fails to properly address the concerns that were raised in the previous application.

We believe that our community, and Cheltenham, deserves the right solution in line with the visions of the emerging Local Plan. Precious Greenbelt has been sacrificed for this B class employment land site. For that to have happened just to make way for more coffee shops and supermarkets would be wrong and we find nothing to support the applicants advocacy for same in the facts of this matter.

We urge you to reject this application and thank you for your time and consideration of our submission.

2 Lypiatt Terrace
Cheltenham
Gloucestershire
GL50 2SX

Comments: 14th June 2018

Please add these comments to the documents section of the planning comments web site for the above hybrid application [[Letter attached](#)].

Please note the enclosed letter relate to the original application but my comments and objections remain the same for the current hybrid application.

20 Springfield Road
The Reddings
Cheltenham

Comments: 14th June 2018

I am writing to lodge my strong objections regarding the newly re-submitted plans on Grovefield Way. The new plans are still the same Food and Coffee shop, still the same nursery and offices, it doesn't matter how differently you wrap the proposal, the damaging affects are the same.

I do NOT want another food store in Hatherley, with two already large competitive businesses, we have sufficient facilities, another store will affect both stores profits and any smaller businesses who are trying to survive. I do not believe you should approve a new business that would create job losses, noise pollution with overnight/ early deliveries.

I do NOT want a coffee house, with the current environmental pressures to reduce the use of takeaway cups and boxes, I would not welcome any business that adds to the damage to the environment, littering will occur and traffic increase

I do NOT want a nursery, there are three perfectly good childcare facilities close by, their businesses will be affected and is a child care facility really a good idea so close to the Golden Valley, with increased air pollution due to traffic increasing. It will affect the childrens health?

I do NOT want offices, I do not want to live in the middle of an industrial estate, it will affect house prices detrimentally, the roundabout off Grovefield Lane already is very congested throughout the day, it cannot cope with an increase of traffic created by the new businesses. I do not want the employees of these new businesses parking inconsiderately in my road, or causing harm to my children as they try to get to school safely.

I do NOT want the Park and Ride filled up with employees cars, it should be able to be used by Cheltenham residents/ visitors to our town for the purpose it was created.

I must ask if any surveys have been completed in Hatherley to see the affects of the new BMW business, the pollution, the traffic congestion, the employee parking, before You consider just adding more to the area.

Where is the support for the Hatherley and Reddings residents, where is the safeguard for our communities and putting the support into already existing businesses. It is time for Councils to stop puttting money first and think of residents health and well being.

I hope you will listen and consider these real issues and say no.

Groom Cottage
Badgeworth Road
Cheltenham
GL51 6RJ

Comments: 9th October 2018

I strongly object to the above planning application for the following reasons:

1. There is no need for another supermarket in this area.
2. Excessive light pollution.
3. More traffic congestion in an area that is already congested.
4. It will be eating up more Green Belt.

I could go on and on but lots of other people in the surrounding area have already voiced there objections to this application and I fully support their objections.

To reiterate the comment from another objector, "When are the council going to get the message we don't want this building application to go through"!

Springfield
The Reddings
Cheltenham
GL51 6RY

Comments: 9th October 2018

Questions need to be asked as to why there is such a rush to get this to planning committee, with scant regard to consultation with the community. The Reddings Residents' Association has provided a 92 point report questioning this application, which in its current form is clearly completely unfit for purpose. As such, officers surely can't even think of permitting this and wasting everyone's time considering it. Time the community has already had to waste in writing more objections on a near-identical application.

At the end of it, the area has had to sacrifice precious greenbelt to this folly, and so the developers must be made to build what they have permission for - B1 offices. There can be NO Aldi on that site as it will then provide a precedent for the rest of the site to be entirely retail - which I believe is the plan. Costa have backed out (presumably to go to the Tewkesbury Road site). The offices at the back of the site are just indicative with no real commitment - presumably waiting to turn them into retail. Nobody has seen fit to look at the health ramifications of siting infants and young children in the middle of a car parks/major roads, despite there being growing evidence of the catastrophic health problems on the young that can be caused by traffic fumes. Traffic data is flawed. Too few car parking spaces are being provided. The Park and Ride next door, famously, is a staff car park now, and any retail adjacent to it will seriously impact its capacity, potentially jeopardising the West of Cheltenham Cyber Park. This application is madness. So in short, I AGAIN object to this application because:

- a) There are too many unanswered questions on the application which must be resolved before it can be considered;
- b) Traffic data analysis is unreliable and old;
- c) A nursery shouldn't be permitted in such an environment;
- d) Light and noise from retail on the site will impact adjacent neighbours 7 days per week and at weekends - unlike office usage which is traditionally 8am to 6pm on weekdays;
- e) Insufficient parking - Aldi are currently fighting the community to create more parking spaces in their Tewkesbury store proving their "experts" were incorrect in their calculations of spaces needed. Something that will happen again on this site if allowed.
- f) Neighbours already have to put up with lights all night from BMW on this site, which are presumably left on for security reasons. We assume retail would also have a similar lighting requirement. There is no indication of any light screening being provided in order to protect neighbours.
- g) What times are they proposing to open this store? There is no indication.
- h) Lorry deliveries in the early hours impacts neighbours hugely, as can be verified by adjacent neighbours to Asda. How would this be controlled: does the developer even care?
- i) Allowing such a large area of retail is denying office space and therefore less staff will be employed per m2.
- j) The developer is congratulating themselves on taking money away from other supermarkets and dressing it up as providing financial benefit. All that will happen is staff from other shops will be made redundant as their employer's profits drop because of this store. As such, it's just a redistribution of wealth (and staff).
- k) Non-indigenous species of trees and planting and "flailing" the hedge to 2m. As if wildlife from this site hasn't suffered enough. As it is creatures are now drifting back to the new "habitat" created by the BMW spoil heap, so there will be another chance to eradicate wildlife - as if once wasn't enough.

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I could go on but really don't see why I should. I'm angry about this farce, as are my neighbours and the community. Nobody wants this store except the developer The developer who stands to make a significant sum of money on the back of permission for Aldi, using the absurd argument that it was necessary in order to attract occupiers to offices!! Seriously? If the intention is to use attrition to grind the community down and give up, then that demonstrates poor judgement - as can be seen by the number of complaints.

Mr Joe Seymour
Planning
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA



Sent via planning@cheltenham.gov.uk

19th June 2018

Dear Mr Seymour

18/01004/FUL | Hybrid application seeking detailed planning permission for a 5,034 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m Aldi food retail unit (Use Class A1), 204 sq.m Costa Coffee retail unit and drive-thru (Use Classes A1 and A3), with associated parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission). | Land At North Road West And Grovefield Way Cheltenham Gloucestershire

On behalf of ASDA Stores Ltd. (ASDA), TPS Transport Consultants Ltd (TPS) has reviewed the Transport Assessment prepared by Transport Planning Associates (TPA) to accompany the above planning application; this is with a view to ensuring that the operation of the local road network and road safety is not unduly and detrimentally affected by the proposed development and that all planning matters are duly considered.

This review has highlighted a number of issues and concerns which form the basis of ASDA's formal objection to the application on highway grounds; these are summarised below.

Planning History and Development Proposals

We would note that a hybrid planning application (16/02208/FUL) was submitted for the site in 2016, for an 18,453m² development, comprising B1 employment, A1/A3 Costa Coffee Drive-Thru, A1 Aldi discount food retail and D1 Day Nursery uses; this was refused. The Transport Assessment that has been submitted to accompany the current planning application states in relation to the previous application that *"there were no objections raised by either Gloucestershire County Council (GCC) or Highways England in relation to highways matters, and it was agreed that the development would not result in any severe impact in comparison to the extant consent"*.

However, the Decision Notice states that *"Due to the mix of uses proposed, the development would result in an increase in traffic on the surrounding road network into the evenings and at weekends in addition to the AM and PM weekday peaks. This would have an unacceptable impact upon the local road network which is already heavily used. For these reasons the proposal is considered to be contrary to policy INF1 of the Joint Core Strategy."*



Notwithstanding the recent refusal, the site has a long planning history and benefits from extant planning permission, Table 1 below summarises the previous planning applications associated with the site as set out in the Transport Statement.

Table 1: Planning History

Year	Application Reference	Quantum
2007	05/00799/OUT	22,000m ² B1 and 524 parking
2009	09/00369/REM	22,000m ² B1 and 700 parking
2012	10/00468/TIME	Extension of 2017 and 2012
2014	13/01101/FUL	7,500m ² BMW Garage
	14/01343/OUT	16,800m ² B1

(Source: TPA Transport Assessment)

The current hybrid application seeks full planning permission for:

- 6,593m² B1 office space;
- 800m² day nursery;
- 2,037m² food retail supermarket; and
- 287m² coffee shop retail unit and drive thru.

and outline permission for 8,736m² of commercial office space and associated infrastructure. This is broadly the same proposals submitted in the refused 16/02208/FUL application, with a small (17m²) reduction in the GFA of the proposed Costa Coffee from 304m² to 287m².

Local Policy

The Transport Assessment notes that since the previous application the Joint Core Strategy (JCS) between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council was adopted in late 2017.

The Joint Core Strategy is informed by transport modelling work, and the Transport Assessment notes that *"whilst there is no specific reference to the committed scheme at Grovefield Way being explicitly included within the transport modelling work of the adopted JCS, the site was included within the employment land supply assessment and the baseline model accounts for all committed growth within Gloucestershire."*

It is assumed that the transport modelling would take account of the committed development associated with the most recent application on the site, which would comprise 16,800m² B1



(14/01343/OUT). It is concluded in the Transport Assessment that *"The transport modelling work therefore implicitly allows for traffic associated with committed sites such as at Grovefield Way"*

However, as discussed in the Transport Assessment (Table 5.3), the development proposals result in an increase in trips by some 18 two-way trips in the AM peak hour, 15 two-way trips in the PM peak hour and 253 two-way trips in the Saturday peak hour. Furthermore, as will be detailed further, and reflective of our objection to the previous hybrid application (16/02208/FUL), the traffic impact of the development proposals during a weekday PM and Saturday peak periods may have been significantly underestimated. As such, it is misleading to suggest that the highway network can implicitly accommodate the trips associated with the current planning application.

Baseline Data

The Transport Statement sets out that ATC data was collected between 6th - 12th July 2016 on Hatherley Lane between the Arle Court roundabout and the Park and Ride roundabout and further manual classified counts were undertaken on Saturday 9th July at the Arle Court roundabout and Grovefield way / Hatherley Lane / Park and Road roundabout.

We would note that Department for Transport's TAG UNIT M.12 'Data Sources and Surveys' identifies neutral months as March, April (excluding Easter), May (excluding bank holiday weeks), June September (excluding return to school weeks), October and November, with a neutral month being one which *"avoids main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods."*

July is not a neutral month and, as such, observations of highway network operation and traffic data gathered at this time cannot be considered to be representative and should not be used to assess the impact of the development proposals; the assessments should, therefore, be revisited using base data gathered in a neutral month.

Servicing

The Transport Assessment provides swept path analysis; the tracking shows the following movements:

- A refuse vehicle accessing and egressing via the car park to the bin store at the rear of the Nursery, Costa Drive Thru and the offices;
- A car using the Costa Drive Thru; and
- An articulated vehicle accessing and egressing via the car park to the ALDI service area.



Delivery Management Plans (DMPs) have been submitted with the application “which include the necessary details to ensure that there are no highway safety concerns arising from the servicing of the site”. Table 2 summarises the anticipated servicing requirements associated with the various occupiers.

Table 2: Servicing Requirements

Occupier	Servicing Requirements	Service Vehicle	Scheduling
Nursery	One Weekly Food Delivery	Box Van	07:00 – 19:00 Monday - Friday
	Twice Monthly Nursery Supplies	Transit Van	
	Twice Weekly Refuse Collection	Refuse Vehicle	
Costa	One Daily Delivery	8.45m Rigid Vehicle	06:00 – 23:00 Monday – Saturday
	Six times a week Refuse Collection	Refuse Vehicle	08:00 – 18:00 Sunday
Aldi	One Delivery Per Day	16.5m HGV	06:00 – 23:00 Monday – Saturday 08:00 – 18:00 Sunday

(Source: TPA Transport Assessment)

Whilst the preparation of the DMP's is welcomed, there remains no commitment to undertake deliveries outside of occupiers opening hours, despite the likelihood of deliveries taking place while customers and staff are on site and, as such, there is significant potential for pedestrian / HGV conflicts within the car park.

Parking

The Transport Assessment sets out that a car park accumulation exercise has been undertaken based on the trip rates, however, the car park accumulation calculations are not provided in the Transport Assessment for review. Notwithstanding this, it notes that a maximum car park accumulation for the Aldi, Day Nursery and Costa Coffee is 107, and concludes a requirement for 129 spaces “allowing for an operation capacity of 85%”.

However, it goes on to note that “Operationally Aldi have advised that they require additional car parking spaces over the 129 spaces indicated by the TRICS parking accumulation. The reason for this is that recent trends in Aldi shopping habits have led to customers using the shop more as a ‘destination shop’ rather than a ‘top-up shop’. This means that, whilst the overall number of movements to the store has not materially changed, the average dwell time of each customer has increased from 30 minutes to 40 minutes. This therefore leads to a higher demand for car parking. Added to this is the coffee drive-thru element of the proposed scheme, where customers may choose to visit before/after shopping at Aldi, thereby further increasing the dwell time and parking demand accordingly.” Consequently, the Transport Assessment proposes the provision of 154 car park spaces



Firstly, the Transport Assessment does not provide any further information to justify the additional 25 parking spaces for the Aldi in terms of evidence from other Aldi stores. Secondly, we would note there is a discrepancy between the Transport Assessment, which proposes 154 car park spaces and the accompanying Masterplan layout, which shows 152 parking spaces.

Furthermore, with reference to Gloucestershire County Council's 'Parking and Demand Management Strategy' Table 3 summarises the development proposals, the resultant parking permitted based on parking standards and a comparison with the actual proposed parking set out in the Transport Assessment.

Table 3: Parking Proposals

Land Use	Quantum	Standard	Parking Provision	Proposed Parking
Food	2,037m ² Aldi	1 space per 18m ²	113	154
Retail	287m ² Costa		16	
Nursery	800m ² (27 employees)	1 space per 2 employees	14	
TOTAL			143	154

(Source: Gloucestershire County Council's 'Parking and Demand Management Strategy')

The Transport Assessment sets out that a car park accumulation has also been undertaken to inform parking requirement for the office development, it is stated that the offices have a maximum parking accumulation of 222 vehicles. Again, the car park accumulation calculations are not provided in the Transport Assessment for review.

We note that the Transport Assessment also identifies that the previously permitted office development (09/00369/REM) allowed 700 spaces for 22,000m² of office development, which would result in a ratio of 1 space per 31m² which, if applied to the current detailed application, would allow provision of 213 spaces associated with the offices. Similarly, when considered in the context of Gloucestershire County Council's 'Parking and Demand Management Strategy', which permit one parking space per 42m², a maximum of 157 spaces would be permitted. Nonetheless, the Transport Assessment confirms that the provision of 222 car parking spaces "*is considered appropriate to serve the development proposals*". Notwithstanding this, the accompanying Masterplan drawing shows only 191 car parking spaces.



Whilst the level of parking to be permitted should be clarified and confirmed, the overprovision of parking across the site will encourage an increased number of car borne trips and thus is contrary to current transport planning policies.

The Future of Transport White Paper, published in July 2004, set out a long-term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment over 15 years; effective management of the road network is a key part of this. The Traffic Management Act 2004 also imposed an explicit duty on local authorities to manage their network so as to reduce congestion and disruption. As a result, parking policies need to be integral to a local authority's transport strategy.

The second edition of the Guidance on Local Transport Plans, published in December 2004, says that local authorities should have policies aimed at tackling congestion and changing travel behavior. These could include restricting car parking. All local authorities, nonetheless, need to develop a parking strategy covering on-street and off-street parking that is linked to local objectives and circumstances. This strategy needs to take account of planning policies and transport powers and consider the needs of the many and various road users in the area, the appropriate scale and type of provision, the balance between short and long term provision.

Having set out a clear idea of what its parking policy is and what it intends to achieve by it, each authority should appraise the policy and its objectives regularly and, when setting and appraising the policy, should take account of the:

- Existing and projected levels of parking demand;
- Availability and pricing of on and off-street parking;
- Justification for and accuracy of existing Traffic Regulation Orders; and
- Accuracy and quality of traffic signs and road markings that restrict or permit parking.

The Transport Assessment makes no reference to current parking policies and how the development is in accordance with these. The recent change in residential parking provision, from maximum provision to minimum provision and as an origin of trips, puts increased emphasis on destination parking provision to ensure that the move towards the more sustainable movement of people is not compromised.

Notwithstanding the queries regarding the proposed level of parking provision, the Transport Assessment does not provide details of intended car park management. With various adjacent retail and employment uses on the site, it is unclear how parking will be managed such that the retail



parking is not utilised by office workers throughout the day as additional commuter parking, again encouraging car travel to the site by employees. Similarly, there is no information provided to demonstrate how retail parking will be controlled such that it does not overspill into office car parks.

Development Trips

The Transport Statement sets out the approved level of two-way trips associated with each previous planning application associated with the site, for ease these are summarised in Table 4 below.

Table 4: Approved Trip Generation

Planning Application	AM	PM
2007 Appeal	320	267
2009 Reserved Matters	719	666
2012 Extension	578	603
2014 BMW Showroom	111	111
2014 Business Park	441	460
Extant Trip Generation	552	571

(Source: TPA Transport Statement)

As can be seen from Table 4, based on the most recent applications for the site, the BMW showroom and business park, the extant trip generation associated with the site is 552 two-way trips in the AM peak hour and 571 two-way trips in the PM peak hour.

The Transport Assessment references the use of TRICS to derive trip generation associated with the current proposals, however, it **doesn't clearly** set out the trip rates used. Reference to the TRICS outputs provided at Appendix F of the Transport Assessment would suggest that the trip rates summarised in Table 5 below have been used.

Table 5: Proposed Trip Rates

Land Use	AM			PM			Saturday		
	Arrival	Departure	Total	Arrival	Departure	Total	Arrival	Departure	Total
Food Retail	0.992	0.714	1.706	3.402	4.292	7.694	5.941	6.246	12.187
Drive Thru	9.328	8.657	17.985	8.239	7.736	15.975	28.509	26.339	54.848
Office	2.031	0.254	2.285	0.171	1.752	1.923	N/A	N/A	N/A
Nursery	1.128	0.993	2.121	0.772	0.960	1.732	N/A	N/A	N/A

(Source: TPA Transport Statement)



It is recognised that the use of the TRICS database is the industry standard approach, however, in this instance, TPS considers that the suggested trip rates will significantly underestimate the traffic generation of the Discount Food Retail store. It is typically the case that small format retail stores have high trip generation rates when compared to larger, more traditional retail stores and the TRICS database has few examples of small format stores.

We would respectfully draw your attention, therefore, to a planning application for a Lidl Food Store in Todmorden, West Yorkshire; the application to Calderdale Council has the following reference - 15/01029/FUL. Lidl and Aldi are both regarded as discount food retailers, operate from similar small store formats and have similar business models.

As can be seen from the Transport Assessment that accompanies the Lidl store planning application, peak hour traffic movements were collected for a number of Lidl stores across the country. For the purposes of that assessment, three Lidl stores of a similar size to that proposed at Todmorden – and of a similar size to the proposed Aldi store - were presented in Table 6.1 (Page 28); this table is replicated here, Table 6, for ease of reference.

Table 6: Average Trip Rates for Larger Format Lidl Stores

Stores	Weekday PM Peak Hour			Saturday Peak Hour		
	Arrival	Departures	Total	Arrivals	Departures	Total
Transport Assessment	3.402	4.292	7.694	5.941	6.246	12.187
Wrexham	7.47	7.68	15.15	10.81	10.73	21.54
Holywell	10.03	10.50	20.53	9.25	10.11	19.36
Wallasey	9.33	9.64	18.97	12.29	11.66	23.95
Average	8.94	9.27	18.21	10.80	10.80	21.6

(Source: Transport Assessment July 2015 -SCP)

As can be seen from Table 6, the Holywell trip rates for a weekday peak period are significantly greater than those trips rates derived from TRICS and employed in the Transport Assessment for the Cheltenham development; the variation in potential trips is marked with 20.53 two-way trips per 100m² counted as opposed to the TRICS derived and proposed 7.694 two-way trips per 100m². Equally, the Saturday peak period trips rates for the Lidl store at Wallasey store in the order of 23.95 two-way trips per 100m² as opposed to the TRICS derived and proposed 12.187.

The application of the these potentially more representative trip rates to the proposed development would result in a significant increase in forecast traffic generation as summarised in Table 7. As such,



TPS considers that the Transport Assessment is potentially and significantly underestimating the traffic impact of the development proposals.

Table 7: Average Trip Rates for Large Format Lidl Stores

Stores	Weekday PM Peak Hour			Saturday Peak Hour		
	Arrival	Departures	Total	Arrivals	Departures	Total
Transport Assessment			157			248
Holywell	204	214	418			
Wallasey				250	238	488
Variance			+216			+240

(Source: Consultant Calculation)

Given the above, it is considered that the traffic generation forecasting should be revisited so as to comprehensively assess the potential highway impact of the development proposals.

The Transport Assessment provides a comparison between previously permitted development on the site and the current proposals. For further comparison, Table 8 summarises this information and sets out a revised trip generation associated with more onerous discount food retailer trip rates, for the reasons described above.

Table 8: Trip Generation Comparison

Stores	Weekday PM	Saturday
2009 Extant*	666	-
2014 Extant**	571	88
Transport Assessment	586	341
TPS	771	473

* 22,000m² B1 Office

** 16,800m² B1 office and BMW Car Showroom

The Transport Assessment asserts that weekday PM peak trip generation associated with the current proposals would result in an increase in vehicles movements of less than one additional vehicle every three minutes during the peak period when comparing to the 2014 permission, or indeed a reduction in trips when comparing it to the 2009 permission.

We would note however, when considering the impact of the development using the more robust trip rates set out in Table 7, the proposals could result in an increase of 105 - 200 two-way trips in the PM



peak hour. This is a significant increase in trip generation, the impact of which should be considered on the surrounding highway, to demonstrate that the increased demand can be accommodated without undue impact on capacity and road safety.

The Transport Assessment acknowledges that there would be an increase in trips on the network on a Saturday with the current proposals, compared to the previous solely office proposals. To consider the potential impact of this, the 2016 baseline flows for the Saturday were obtained; as we have already highlighted, however, these were collected in a non-neutral month and, as such, are not suitable for use in assessing the impact of the development.

Nonetheless, the Transport Assessment presents the total flows on Grovefield Way in the weekday AM peak hour, weekday PM peak hour and Saturday peak hour inclusive of baseline trips and proposed development trips. It is suggested that *"the proposed development flows in addition to the baseline traffic flows during the Saturday peak period will result in fewer vehicle movements compared to those previously agreed as acceptable for both the AM and PM peak periods"*.

However, the Transport Assessment acknowledges that the previous application was refused *"with the impact of development traffic at weekends cited as a reason for refusal"*, and as such the operation of the Arle Court Roundabout has been considered further.

Operational Assessment

The operational assessment of the Arle Court roundabout is welcomed; however, it is not clear how the scope of the assessment has been determined, or why there has been no consideration of the operation of the Site Access / Grovefield Way or the Grovefield Way / Hatherley Lane junctions.

The findings of the operational assessment at the Arle Court roundabout suggest that the junction will operate with a maximum DoS of 87.6 on the **A40 Gloucester Road approach** and a queue of 24 pcu's. However, it is considered, that the operational assessment should be revisited:

- Using traffic data collected in a neutral month; and
- Reflecting a more robust trip generation methodology.

Given the above, the Transport Assessment has not adequately demonstrated the likely impact of the development proposals, and as such is deficient. At this time, it is not possible to determine accurately the likelihood of the development resulting in a severe impact upon highway operations and, therefore, that the local authority cannot make a sound decision on the application.



Summary

In summary, we would draw your attention to the following key concerns:

- The Transport Statement is based on traffic data gathered in a non-neutral month, and as such is not appropriate for use;
- Servicing arrangements would result in potential conflicts between customers, staff and delivery vehicles;
- Proposed parking provision and management and its suitability to cater for demand without over incentivising travel to the site by car;
- The trip generation significantly underestimates the likely trip generation, and thus highway impact of the development proposals; and
- Capacity assessments should be undertaken, with neutral data and robust trip generation, to fully understand the impact of the development proposals over and above the extant position.

Given the above, it is considered that the Transport Assessment is deficient. As such, the Council cannot reasonably arrive at a well-considered and sound planning decision. The planning application should, therefore, be refused on highways grounds.

Yours faithfully

Charlotte Ovenden – Principal Consultant
TPS Transport Consultants Ltd
Charlotte.Ovenden@tpsconsultants.co.uk



TPS Transport Consultants Ltd | TPS Business Hub | Stonebridge Court | 151-153 Wakefield Road | Wakefield | WF4 5HQ

 [tpsconsultants.co.uk](https://www.tpsconsultants.co.uk)

 info@tpsconsultants.co.uk

 +44 1924 664638

Registered number: 05973261



9/6/18

Dear Mr. Seymour,

In regard to planning reference: 18/1004/FUL I want to strongly object to any retail development of this land. I have lived in this house for years and it has been a quiet and peaceful road. If this retail development takes place I will be looking out onto the back of Aldi. Why is it mainly retail rather than offices which the land was specifically released for?

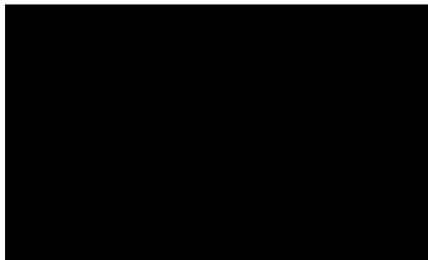
Parking is another issue as I am faced with BMW workers parking in the road and sometimes causing obstruction. This will only get worse with more retail being built and clearly insufficient parking being made available to staff and customers.

Also I can't believe that there will be minimal noise pollution as reported by one of the assessment documents. Given that I can now hear the A40 because the trees have been thinned by BMW-something which I haven't been able to hear before-how much more noise will be created by a retail park being open between the early hours of the morning till ten at night 364 days of the year? Of course there will be significant noise? Of course there will be significantly more noise pollution as well as air pollution. This is unacceptable.

Finally, what about the wildlife? I see bats flying regularly between the Grovefield site and the houses of North Road West and my neighbour has captured this on video on camera. At this time, when there is so much concern over the environment, this development will only succeed in destroying more wildlife. Again, this is unacceptable.

I object strongly to this planning application. It is morally wrong to let the developers go ahead with this.

Yours sincerely



Planning Application 18/01009/FUL

PLANNING

Rec'd 14 JUN 2018

SERVICES

Prof Joe Seymour
 Cheltenham Borough Council

Re. New Proposal: Aldi, Costa Coffee Outlet, Nursery and
 future Retail Outlets - Groveford Way.

2. Resubmission to build 90 homes by Newland Homes

Dear Sir,

I object to the above application on the following grounds

1. JCS Determination Ignored (Cost of 7 million) (7 years)

2. Refusal to develop by Cheltenham Borough Council

3. Traffic increase bringing pollution and noise

4. If permitted the flood gates will open Newland Homes

a) If permitted it will ignore the original permission to build B1 Offices with a limited operational times

b) A full Council refused the original application. What has changed?

c) Traffic increase. With future population growth and with it a huge increase in vehicular use, what analysis of traffic on present structures of roads has been carried out? Access to Groveford Way will affect the flow.

d) Aldi Supermarket. The area is well served already by ASDA and Morrisons. We do not need another supermarket with long opening hours.

e) Jobs. BMW has shown that very few new jobs have been generated only relocation from closure of Gloucester BMW and Cheltenham BMW. Their employees are not permitted to park on BMW premises so

park on public roads and use the Park and Ride
 places paid by BMW. Is it legal? It certainly
 - blocks parking places for visitors to Cheltenham.
 Why do Stragecorth Coy. use two double deckers
 to service this facility? It appears very few people
 use this service!

f) In this application there is an intention to
 develop this site as a retail facility. The original
 permission for B1 development did not foresee this
 and the Government helped into game permission
 was made of ASDA Supermarket as housing
 in Graeford Way.

g) This manipulation of the Planning Rules is being
 exploited and carried out by STEALTH and
 everyone can see what this application will
 bring to the area.

h) The Reddings area will gain nothing from
 this application. There appears to be no planning
 gain for the residents. These Businesses will
 - will be increased to maximise profits from
 the original B1 permission which local people!!!
 understood and approved. We are not Nimbys!!!

i) Almost devious in the efforts of the
 - developers.

j) I object to this proposed Retail Park!

— Jon Fairclough Douglas MacGregor



28/5/18.

Dear Sir or Madam

Ref. No. 18/01004/FUL

I am writing to say that I am unhappy about this application. It will inevitably increase traffic volumes nearby which are already at saturation point due to previous developments. The large buildings that are proposed - the commercial office space and the Aldi supermarket - would create congestion, and it is difficult to see why it is necessary to build them in this location.

Yours faithfully





62 Greatfield Lane
Up Hatherley
Cheltenham
GL51 3EN

30/9/18

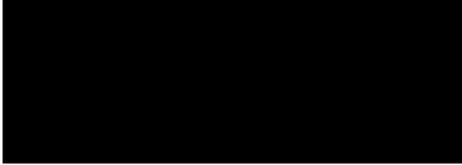
RefNo: 18/01004/FUL

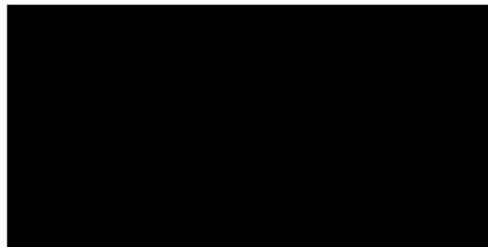
Dear Sir or Madam,

I am writing in response to this planning application, which is a revised version of a previous application. I write to express serious reservations about the previous application, and I do not think that the revised version has sufficiently addressed any of these reservations. In particular, the infrastructure in the area is already over-stretched - the traffic volumes have become a serious problem during busy periods - and the roads would not be able to cope with the additional volumes without major additional road-building - which is not mentioned at all in the application. The area is already well provided for with supermarkets & food outlets, there

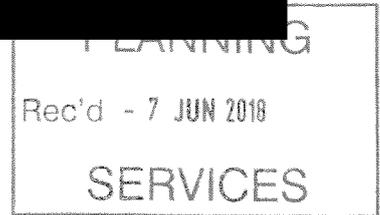
is no need for any more, so I am still opposed
to the approval of this application.

Yours faithfully,





5/6/18



Dear Mr. Seymour,

In regard to planning reference: 18/1004/FUL I want to strongly object to any retail development of this land. My house will be looking out onto the back of Aldi. I don't believe there has been sufficient research into the effect of noise and air pollution which will result from this development given that it will be operating between the early hours of the morning and late into the night.

Permission was given for Green belt land to be released for offices. Why then am I looking at plans which involves retail by stealth rather than offices? This goes against the reason for releasing the land.

Since BMW has been built parking has become a huge issue down North Road West. Even though there was a travel plan in place to apparently deal with such an issue we have been told by Cheltenham Borough Council that there is very little about it that can be enforced. BMW are now using up all the spaces in park and ride so that we now need more car parking spaces. This is extremely relevant to what is proposed in this new retail park. Where will all the staff park? Where will other customers park if they can't get a space at Aldi? Down North Road West. This is unacceptable.

I object strongly to this planning application. I can see absolutely no benefit to the scheme for the local community other than putting money in the pockets of Hinton who are producing the same bland, uninspiring generic retail development up and down this country.

Yours sincerely /





5 Shakespeare Cottages,
North Rd West,
The Reddings
GL51 6RF
4/10/18

Dear Mr. Seymour,

In regard to planning reference regarding the revised Grovefield Way application: 18/1004/FUL. Again, I want to strongly object to the retail element in these plans. The building of Aldi will be the element which will have the most impact on the surrounding environment-there are no indications as to what the opening hours will be and when deliveries occur etc. I know from past experience that once that building is up Aldi will operate as it wishes and there will be no enforcement of any pre-existing conditions e.g. parking plan of BMW was useless and planning enforcers said it couldn't be enforced so what was the point. In this plan there aren't any pre-existing conditions laid out anyway to protect the surrounding community.

I agree with all the points made by the TRRA and can only hope that the planning department will take a proper look at what they have highlighted so that the right decision will be made and the plans rejected. The land was released for B1 purposes and should be only used for office space.

Yours sincerely



6th June 2018



Mr J Seymour

Cheltenham Borough Council

Municipal Offices

Cheltenham

GL50 95A



Dear Mr Seymour

Re: Planning reference 18/1004/FUL

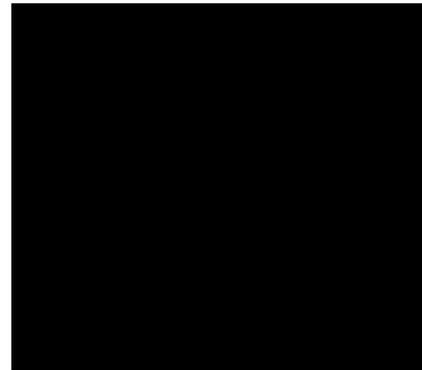
I am writing with regard to the above planning reference.

1. Thought the original plans were for offices and that was the reason **Green Belt** land was released. To put another supermarket, nursery and costa on this land will cause noise pollution, as lorries will be loading/unloading all hours of day and night. Shops will be open 7 days a week.
2. Parking problems. Already parking problems with the enormous B.M.W. built without enough parking places. We child mind for our daughter who lives in North Road West and most times there are cars parked all down the road, on the pavement, causing problems to get on and off her drive and also for people with pushchairs having to walk on a busy road to get past them. It is an accident waiting to happen.... When trying to use the Park and Ride there are never enough spaces to park because of the B.M.W. employees taking all the places. Thought a Park and Ride was meant to be able to park your car and ride into town on the bus.....
3. Air pollution which can only get worse with the extra traffic because of 7 day use of supermarket and costa .

I am totally against another supermarket, costa and nursery being put on what was considered to be Green Belt land and think you should consider going back to original plan of offices and making sure there are enough parking places on this land.

Yours faithfully





4 June 2017

Dear Mr Seymour

Revised Grovefield Way Hybrid Retail Park Second Application 18/01004/FUL

We were very dismayed to receive your letter advising us the developers have made a new application for the Grovefield site, despite being initially rejected by the Borough Council in December 2017.

We wish to register our strongest possible objection to this application for the following reasons:

Hedge and trees

When we moved to The Reddings 17 years ago we were attracted to its semi-rural location and, in particular, the lure of living in a tree and hedge lined country lane.

We have been appalled at destruction of vegetation following the construction of BMW, with the associated loss of increasingly scarce valuable wildlife habitat.

We have no confidence in any reassurances given that our hedge and tree lined country lane will be preserved in its current condition.

Already the bushes in front of the site have been ripped out and replaced with temporary black steel railings. (This suggests a more permanent structure will appear later. Also why is there a dropped curve opposite our house?)

Furthermore when there no leaves in winter, we will be directly facing the new Aldi car park and the industrial style architecture of the store. Any remaining vegetation will not mask the very poor design of the site, which is completely out of character with the local area.

The BMW showroom is a monstrosity.

Traffic

Already Grovefield Way is very congested in the rush hours with vehicles backing up from the Arle Court roundabout to the Grovefield Way/Reddings Road Roundabout.

We find it very difficult to exit our own house and, in particular, to turn right into Grovefield Way, as frustrated drivers are reluctant to let us out.

We fail to see how the amount of traffic will not increase substantially if the site is developed,

especially as there will be an Aldi supermarket open 6 days a week from 8.00 am to 10.00 pm and open 10.00 am to 4.00 pm on Sundays.

Although the existing Asda is open at the same time its frontage is set back from the road and the car park does not directly face residential houses. We will be exposed to the continual traffic noise and light pollution from any shoppers.

(We would question why Aldi needs to be built anyway. The community is already very well served by the local supermarkets including Asda, Morrisons and Home Bargains, as well as Farmfoods, the recently expanded Aldi, Tesco, Sainsburys and Marks and Spencer Food all within a few minutes' drive. There will also be the new Lidl in Tewkesbury Road.)

Pollution

Both of us have developed chronic lung conditions, including asthma and asbestosis.

Any further increase in pollution will exacerbate these conditions and will completely eradicate our main reason for originally moving to The Reddings; namely the desire for a cleaner and healthier environment.

The current level of pollution has also caused eye irritation and nauseous attacks from the associated smell. It will only get worse if the development proceeds.

We understand some local councils in the UK have faced class actions for failing to control pollution. It is better to stop the development now than face expensive legal claims later.

Therefore monitors need to be fixed on Grovefield Way now to assess the level of current level of pollution, before any further development takes place.

Parking

In our letter dated 25 January 2017 we expressed our concern that the lack of sufficient parking at BMW would lead to North Road West becoming an impromptu car park for its employees.

This has now happened and we see at least 6 cars parked inconsiderately along North Road West on a daily basis. Cars are also parked in the Grovefield Way field gates and even on the bus stop.

We have witnessed the difficulty that young parents face walking along North Road West to the playgroup with their push chairs. On many occasions they are forced onto the road to avoid these parked cars.

This is particularly dangerous as the road has now become a "rat run" for commuters. The combination of hurrying drivers and young children is a potentially lethal cocktail.

The refuse lorry and other large commercial vehicles find it increasingly difficult to safely pass these parked cars. This is made even worse by the 2 cars that regularly park on the grass verge obstructing safe passage, as well as destroying the vegetation.

(North Road West is a vital access road for the Staverton based emergency vehicles and therefore should be afforded unobstructed passage.)

One day we even had a BMW employee call at our door asking if we had a CCTV camera, as his car had been scratched. While we do not condone any form of criminal vandalism, we can

only feel this shows the level of resentment towards such parking in the area.

As the new hybrid retail park has insufficient parking spaces for its employees and customers, we feel that there will be a scramble for the existing spaces on the site, with the unsuccessful employees further clogging up the local roads.

(It is ironic that the only double yellow lines in the area are painted on the site entrance to BMW. It seems there is one rule for the community and another for BMW!)

We feel that the promotion of public transport is laudable, but naive. We have given up using the otherwise excellent Park and Ride service as we can never find a parking space.

Conclusion

Whatever cosmetic changes have been made to this second application it does not fundamentally change the nature and purpose of the proposed site; it is comprised of a supermarket, a drive through coffee shop, a nursery and some offices.

As such this letter must be read in conjunction with the points raised in our letter dated 25 January 2017.

Very sadly if this development proceeds we feel that for physical health reasons and our mental well-being we will be forced to move out of our own home.

This is not a decision we would take lightly and one where our original dream of living in a quiet and peaceful semi-rural location would be completely destroyed.

We feel that if the development goes ahead we and all the residents of North Road West should be personally compensated for the deterioration in our quality of life.

(This should not be a vague promise of Section 106 money being used to benefit the local community. We understand £2.1m of Section 106 money was provided by Asda and BMW. Where has it benefitted The Reddings?)

But this would not be necessary if the existing Council decision is respected.

The development is not needed or wanted by the local community.

Yours sincerely

[Redacted signature]

[Redacted address]



1 Shakespeare Cottages
North Road West
The Reddings
Cheltenham
Glos
GL51 6RF
01 October 2018

Dear Mr Seymour

Revised Grovefield Hybrid Retail Park Second Application 18/01004/FUL

We would like to thank the developers for making a sensible decision by removing the Costa Drive Thru Coffee shop from the revised proposals.

We also welcome any plan that increases the amount of vegetation and screening from any development.

However, we are at a loss as to why the Aldi supermarket still remains on the plan.

We cannot see why a new supermarket needs to be built at all when there are more than ample supermarkets and shops in the local area.

If anything we feel there may already be an over provision of food retailers as evidenced by the permanent closure of the convenience store in Benhall.

There is the recently expanded Aldi only 2.6 miles away from this site, so why cannot anyone who likes Aldi shop there?

If an Aldi is built on this site then we will be subject to the same problems as before namely:

- a) Additional traffic being generated from the opening hours up to 10.00 am six days a week
- b) The noise of delivery lorries unloading stock with their very loud reversing sirens
- c) The light pollution from the store and any adjacent buildings
- d) Additional pollution from the site, especially from stationary vehicles running their engines as the local roads reach gridlock in the rush hours
- e) The difficulty of entering and exiting our own property. There are insufficient car parking spaces provided for Aldi which will result in North Road West becoming an even bigger overspill car park. (BMW vehicles parked on the pavements and verges are already making our road difficult to negotiate during the day).

If it could be proved that the proposed offices would be occupied with permanent tenants supplying higher paid jobs, we understand there may be a need for a small store to act as a top up shop for its employees.

However, this could be more than adequately provided by an internal shop in one of the offices, open only during normal office hours.

We understand that there has been some interest in occupying the proposed offices. But in order to build on this green belt land we feel that there needs to be more evidence of a definite contract of occupancy.

As for the children's nursery we are aghast at why small children should be exposed to the level of pollution in the area. Our own lung conditions have worsened since the level of traffic has

increased and we can only feel that the effect will be much worse on young and developing lungs.

We would ask one simple question to those making the decision to approve or refuse this part of the application:

"Would you be happy to send your child or grandchild to such a spot?"

Once again we have reached the conclusion that this development is not needed or wanted by the local community.

The first and second applications have generated 498 complaints from the community. When will the council take the hint?

Yours sincerely

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the signature area.

005.ER/P17-1167

21st June 2018

Mr Joe Seymour
Planning
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Gloucester
GL50 9SA

Dear Sir/Madam,

Re: Planning Application 18/01004/FUL, Hybrid Mixed Use Application (resubmission) – Land at North Road West and Grovefield Way, Cheltenham, Gloucestershire.

We write on behalf of ASDA Stores Ltd in respect of the above planning application.

The hybrid planning application seeks full permission for 5,034 sq.m of commercial office space, 502 sq.m day nursery, 1,742 sq.m Aldi food retail unit, 204 sq.m Costa Coffee retail unit and drive-thru, with associated parking, landscaping and infrastructure works and outline permission for 8,034 sq.m of commercial office space and associated infrastructure.

Our objection relates solely to the supermarket food retail element of the proposals taking into account national and local planning policy considerations and the planning history of the site.

Planning Policy Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be taken in accordance with the relevant adopted Development Plan unless material considerations dictate otherwise. The development plan comprises the saved policies of the Joint Core Strategy (December 2017), Cheltenham Borough Local Plan Second Review (2006) and the Emerging Cheltenham Plan.

It is acknowledged that since the time of our previous representations, the Joint Core Strategy 2011-2031 has been formally adopted. The land at Grovefield Way has subsequently been removed from the Green Belt. When considering the adoption of the Joint Core Strategy the Inspector outlined at Paragraph 176:

"Two other relatively small areas are proposed for GB release, which are not identified within the Plan. One is located at Grovefield Way in the area of The Reddings where development is being built out. The other is in the area of the Old Gloucester Road and Arle Nurseries, which would provide a more appropriate GB boundary to the north of the West

Pegasus Group

Pavilion Court | Green Lane | Garforth | Leeds | LS25 2AF

T 0113 287 8200 | www.pegasusgroup.co.uk | @pegasusgroup

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 **PLANNING**  **DESIGN**  **ENVIRONMENT**  **ECONOMICS**

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Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Cheltenham allocation and to the south of the North West Cheltenham allocation. Exceptional circumstances existing for both of these releases. (Our emphasis)

The conclusion on removal of the site from the Green Belt was made on the basis of the overriding need for employment land and that part of the land was already under construction following very special circumstances having been demonstrated. It would therefore be assumed that the land would be developed as it had been consented, or future applications would be considered in line with the site allocation for B-uses in the emerging Cheltenham Plan.

Paragraph 4.1.4 of the supporting text to Policy SD1 of the JCS states that *"In order to prevent the incremental loss of existing employment land to non-employment uses, and to ensure an adequate supply and choice of employment land and premises for the employment market, district level plans will contain policies to safeguard existing employment sites. These policies in District plans will only permit changes of use in certain appropriate circumstances to be defined by those plans. This policy is intended to be read alongside these District plan policies when considering development proposals for any area."*

Whilst the site is not allocated for a specific use within the Adopted Joint Strategy, it was assessed and released from the Green belt based in on its use as employment land. Furthermore, the land is proposed for employment allocation within the Emerging Cheltenham Plan.

Paragraph 216 of the NPPF outlines that from the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to *"the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given)."* Therefore, whilst it is acknowledged that the site is not yet allocated for employment development, given the level of preparation of the Cheltenham Plan and anticipated Examination later this year, substantial weight can be given to the emerging policies of the Plan.

The release of the land at Grovefield Way from the Green Belt as part of the Joint Core Strategy was supported by the development of the site for employment use. The development of the site for alternative uses including retail, do not represent exceptional circumstances which would justify the release of the land from the Green Belt in this location. Development of this type would be contrary to the Joint Core Strategy and the Green Belt principles outlined in the NPPF and the JCS.

Retail Sequential Test and Impact Assessment

Our previous letters in relation to the refused scheme 16/02208/FUL raised concerns regarding the sequential and impact tests submitted by the applicant. One of our main

points was regarding the site in the North of the Central Shopping Area, the site previously granted planning permission for a mixed use development including a Morrisons foodstore.

Retail Policy SD2 of the Joint Core Strategy identifies that proposals for retail that are not located within a designated centre and are not in accordance with policy will also be robustly assessed against the requirements of the sequential text and impact test as set out in the NPPF. In this instance the necessary policy requirements of the sequential test are outlined at Paragraph 26 of the NPPF.

Within the re-submitted Retail Statement, the applicant outlines at paragraph 7.17 that they stand by the assertion that the North Place site cannot realistically be regarded as an available development opportunity capable of accommodating the proposed development with it being considered that *"the site can be reasonably discounted for the purposes of sequential testing."*

It is concluded that:

7.26 A rejection of the application proposal on sequential ground would not, therefore, have the effect of re-directing the proposal to a sequentially preferable site. Such refusal would simply mean that the benefits and employment opportunities associated with the proposal would be denied to the local community. The application site is demonstrably the most appropriate location for the proposed "economic development".

7.27 We would add that there continues to be uncertainty as to the timing and nature of any comprehensive development proposal at North Place which, significantly, continues to be affected by major constraints regarding the provision of public car parking and affordable housing."

This assertion is further explored within the Retail Impact Assessment (paragraph 8.5) where it is stated that *"it is clear following Morrisons abandonment of this development opportunity that this scheme will no longer proceed. Consequently, there are no grounds for contending that the previously approved regeneration at North Place would be seriously prejudiced by the current Grovefield Way proposal."*

Whilst Morrisons have withdrawn their interest in the site due to a re-appraisal of their development programme, this does not demonstrate in itself that the site is unavailable or unviable for alternative foodstore proposals. As the reasons indicated for discounting the site have not been fully explored, it also cannot be assumed that the proposed development will not unacceptably impact an alternative town centre proposal.

Within the Officers Report written to Committee Members for Application Ref. 16/02208/FUL, it was stated that *"in Officer's view the applicant are in a position where it is more or less impossible for them to pass the sequential test because of lack of information over the intentions for North Place. However not passing the sequential test is*

not an adequate reason for refusal in its own right." Paragraph 27 of the NPPF clearly states that *"where an application fails to satisfy the sequential test it should be refused"*. The sequential approach requires a thorough assessment of the suitability, viability and availability of preferable sites and no evidence has been provided to demonstrate these matters have been thoroughly assessed. Approval of the development would undermine the fundamental principles of policies EM3 and EM1 and various objectives within the Local Plan.

Summary and Conclusion

In summary, we object to the application on the ground that the foodstore proposals represent inappropriate development on the site at Grovefield Way. The proposed foodstore use is considered to be contrary to Policies SD1 of the Joint Core Strategy, Emerging Policies EM1 and EM3 and objectives in the NPPF, JCS and the emerging local plan relating to green belt protection and provision of employment land. The application supporting information has also failed to satisfy the retail sequential test and is considered to be contrary to Policy SD2 of the JCS and Paragraph 27 of the NPPF (Retail).

The site has been released from the Green Belt within the Joint Core Strategy and is identified for allocation for employment use in the emerging Cheltenham Plan. No evidence has been presented to demonstrate that there is no reasonable prospect of the site being used for the allocated employment use. The previous application on the site was deemed acceptable only as a result of the previous consent providing a significant contribution to the employment needs of the Borough so the development of the site should focus on employment uses rather than retail.

We trust that these comments will be taken into account in determining the application and would request that we are notified of any further submissions made by the applicant or the Council's intention to take the application to a meeting of the Planning Committee.

Yours sincerely



EMMA RIDLEY

Planner

E-mail: emma.ridley@pegasusgroup.co.uk

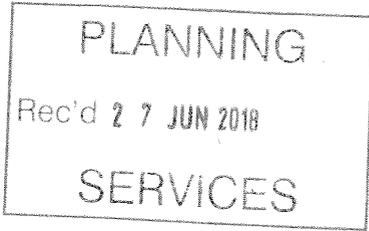
THE REDDINGS

CITIZENSHIP

GLOS.

GL51 6RY.

26. 6. 18.



Dear Mr Seymour,

Re planning application

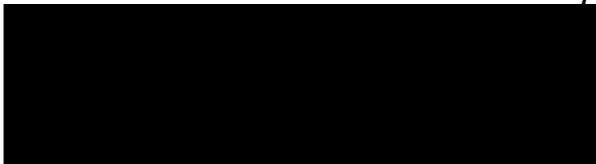
for ALDI. DRIVE THROUGH

COSTA & DAY NURSERY
ON GROVEFIELD WAY.

I WISH TO OBJECT

TO THIS PLANNING &
BEING DONE.

Yours sincerely,



Woodways

The Reddings

Cheltenham

Glos GL516 RL

Planning Department

Cheltenham Borough Council

Municipal Offices

Cheltenham

Dear Sir/Madam

Due to the fact that your server is down for a second day I am obliged to write this letter. I do wonder how many people were unable to access your site and have not been able to express their views?

Re: application ref. no. 18/01004/FUL concerning land at North Road West and Grovefield Way Cheltenham for which I am lodging my objection.

As far as I can see the application is fundamentally the same and so the same objections apply.

Traffic congestion. It has always been an issue at the Golden Valley roundabout and the B&Q roundabout. This has escalated since the building of the BMW showrooms and traffic jams are a common sight especially between 3.45pm and 6pm. Encouraging more traffic to come to a supermarket or a playgroup can only add to the number of cars at its most busy times. If a Costa coffee shop is allowed this too will increase the level of traffic as people come to buy and take away.

The survey carried out into the amount of traffic was not a reliable source of information due to the way in which the data was collected.

Development of the site. This is not an appropriate development of the green belt and there are several other uses to which it could be put which would satisfy residents and convince them that their opinions and concerns are being given some weight.

Light pollution. One only has to go down North Road West in the evening/night to see how the ridiculous level of lighting has impacted on the area. Why was this level allowed when B&Q seem to be quite happy with their security lighting levels?

Supermarkets. The area is already well supplied with small shops and supermarkets. Another in the form of an Aldi will not only increase traffic but be superfluous.

Playgroup. The local playgroups have a good reputation and are not at capacity. Is it fair that they have more competition when they are providing a good service to the community?

These are my fundamental objections and tally with the objections I have made on previous applications to develop this site. The local residents do not see a need for this type of development. We feel that our views should be given serious consideration, after all we are the community upon which this development will impact.

Yours faithfully



Mr Joe Seymour
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham
GL50 9SA

Page 267

29 May 2018



Dear Mr Seymour

Planning reference 18/1004/FUL

I wish to object to the above hybrid planning application for the following reasons:

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green field development is ever permissible. Office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity? And how much demand is there for a drive through coffee shop which is probably also going to generate more litter, of which there is already a vast amount all along the A40 leading into Cheltenham.
2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area?
3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. I moved into Wade Court on Hatherley Lane in 2001 and have seen a huge rise in traffic, particularly since Asda opened. Despite assurances that traffic calming and management measures would be put in place, none have been implemented and the situation will worsen with the proposed development. I have had asthma for a number of years but last year this had developed into Chronic Obstructive Pulmonary Disease and I'm certain that the increased pollution caused by the traffic has exacerbated this. In addition, from a planning perspective, it seems to me that the roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. The impact on existing housing and residents in terms of access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.
- 4 Parking - there is already a big problem with parking along Hatherley Lane which made manoeuvring out of Wade Court difficult and dangerous. The very limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on the site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders like me. The proposed development is bound to generate more misuse of the car park.

The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed hybrid planning application is refused.

Yours sincerely

[Redacted signature]

[Redacted footer]

Rec'd 30 MAY 2018

SERVICES

28th May 2018

Ref 18/D1004/FUL

Dear Sir or Madam

I am writing to express my concerns about the above application. I am particularly concerned about the increased traffic it will generate on roads which are already grid-locked at peak times. I also do not believe that there is a requirement for yet another supermarket with Asda so close and Morrisons, Princess Elizabeth Way / Coronation square, Sainsbury's all within a short drive.

I am content with the proposal for

a day nursery but do not believe that
large developments such as Page 269 Ltd and
commercial offices with the traffic flow
these will generate are appropriate in an
area where the roads are already so very
busy.

Yours faithfully,

A solid black rectangular box redacting the signature of the sender.



Page 270

Greatfield Lane,
Up Hatherley,
Cheltenham,
Glos GL51 3QY
20th September 2018

Ref 18/01004/FUL

Dear Sir or Madam,

I have received two letters relating to the resubmission of the above application. These revised plans do not appear to have addressed the concerns which I stated in my previous comments, particularly in regard to the increased volumes of traffic that these proposals will generate in an already over-busy area. At peak times the roads are already highly congested. I still see no need for an Aldi (or similar) store so close to Asda, nor for yet another Costa Coffee in Cheltenham. I see no proposals for alleviating any increased traffic on Greatfield Lane and the very busy B+Q roundabouts.

I hope you will note my concerns in relation to this application. Thank you.

Yours faithfully





f.u.o. Mr. Joe Seymour.

3, CAIRHAVEN PARK,
THE READINGS,
CHELTENHAM,
GL51 6RW.

ref. 18/01004/FOL

8/10/2018

Dear Sir,

Being somewhat ignorant of precise planning directives, I can only write from a residential common sense viewpoint.

Surely, to encroach upon Green Belt, or similar, lands and/or greatly affecting existing residents, the need for such should only be undertaken where imperative.

A new supermarket is completely unnecessary, with two entirely adequate likecupera in the area, and therefore not a viable option.

New office blocks for whom & what, with empty office space already available within the Cheltenham area.

Day nursery (and CitaCoffee?) obviously aimed at office employees and supermarket customers; so, without them, unnecessary!

All of the above will add to traffic with its extra pollution and noise, of which there is already enough in this area (up to 24 hrs/day) eg. Motorway, Golden Valley Bypass, Grovefield Way, Park and Ride, GCHQ etc etc

The development will not bring 'outside' people to Cheltenham town, only to outskirts - arrive, work, spend, leave. When ~~will~~ will expansion of this side of Cheltenham cease, - are we trying to become part of Gloucester?! - or do boundary adjustments come into play!

In this world where materialism, prestige, speed and greed seem to take precedence over Quality of life, please bring your consideration for existing rate paying and lifelong Cheltonians to the fore

Yours faithfully

Iona
The Reddings
Cheltenham
GL61 6RL

4th October 2019
Ref 18/01004/FUL

Dear Sir,

Ref the above planning application, I wish to object on the following grounds.

1 There is no need for another supermarket in this area. The introduction of yet another supermarket will take away trade from the other existing local stores such as ASDA and Morrisons. While it may initially provide employment, long-term it will be to the detriment of the other stores who will probably end up reducing staff numbers.

2 The office blocks are too big at 3 storeys. Buildings this tall will cause light pollution to the surrounding properties. There is no mention in the application about the position of air conditioning units for the office blocks or what would be done to prevent noise pollution from the units when they are installed.

3 In the Design and Access Statement Addendum, Section 4 Proposed Office Design Office 5 “The building follows the same design language as the other proposed offices, which are very simple, clean, modern buildings that draw inspiration from the BMW Mini dealership.” This building is a blot which has ruined the rural aspect of The Reddings, I have yet to find anyone who lives in the area that thinks otherwise.

It also states that “It is important that the building is a minimum of two storeys in height and that the finished floor level was set to a suitable level to ensure that the building was prominent and provided an attractive entrance to the business park.” By stating that it is a minimum of two storeys with no maximum the applicant has left it open so that he can build a bigger office block in this position if this application is accepted. The wording must be written stating what he is going to build and stick to it. There have been too many occasions when developers flaunt the planning rules by building what they want after applications have been approved for something smaller and then put in a retrospective application.

4 Transport - In the Transport Assessment Technical Note Section 3, this section still refers to Costa Coffee although this document was submitted after the application was revised to remove Costa.

Para 3.4 states “As set out in Chapter 6 of the TA, it was agreed with Highways England (HE) and GCC that the proposed development would not have a material impact on the operation of the Arle Court Roundabout during the weekday AM and PM peak hours.” The photographs on pages 2 to 5 show the congestion around Grovefield Way, the Arle Court and B&Q roundabouts and the Golden Valley By-pass. These pictures show that the roads struggle to cope with the existing traffic and the certainly will not cope with increased traffic demands resulting from the building of this development despite what the report says.

I feel that this development which is still currently in the green belt is unwarranted and should be rejected.

Yours Sincerely,



Pictures of traffic on Grovefield Way and around Arle Court

Despite what the traffic survey states these pictures prove that the roads struggle to cope with traffic now. They certainly will not cope if the 5 office blocks and supermarket are permitted.

Note: figures in the bottom right hand corner of photos are the date and time.



Photos 1 & 2. Traffic queuing past BMW to the B&Q roundabout



Photos 3 & 4. Traffic queuing from BMW to the B&Q roundabout



Photo 5. Traffic queuing on the B&Q roundabout



Photos 6, 7 & 8. Traffic queuing from the B&Q roundabout to Arle Court roundabout showing dangerous driving. Traffic heading towards the Arle Court roundabout on the wrong side of the road into oncoming traffic.

An accident waiting to happen.



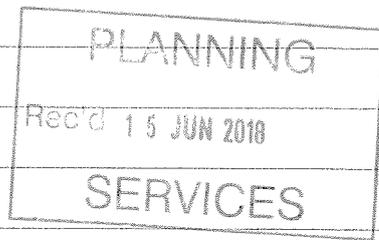
Photos 9 & 10. Traffic queuing from the B&Q roundabout to Arle Court Roundabout



Photos 11 & 12. Stationary traffic on the A40 heading from Cheltenham to the Arle Court roundabout



Photo 13. View along the A40 Golden Valley by-pass showing stationary traffic queuing from beyond the Gloucester side of Junction 11 heading to the Arle Court roundabout.



2, Frampton Mews,
The Reddings
Cheltenham
GL51 6UG
13th June 2018

Dear Mr Joe Seymour,

Revised planning application - CBC ref 18/01004/FUL -
for the development of the Grovefield Way site.

We wish to register our strongest possible objection
to this application for the following reasons:-

1) Traffic Problems

Grovefield Way already suffers very high
congestion during rush hour, with traffic backing
up from Arle Court roundabout to Grovefield Way/
Reddings Road roundabout. To add another
supermarket (Aldi) will exacerbate the current
traffic problems

2) Pollution

Already the Reddings area are experiencing very
unpleasant levels of pollution

3) Existing local retail and Restaurants

The Reddings is already very well served with
local supermarkets:- ASDA, Morrisons, Home
Bargains, B+Q. Restaurants within ASDA, Morrisons
KFC, Travelodge, Jersey Inn.

4) Over Development

The CBC Planning Dept has shown great weakness in allowing planning rules being roughshod by developers therefore getting away with inappropriate developments.

One question needs addressing £2.1m money which was provided by ASDA and BMW - what sort of compensation has been provided for the community.

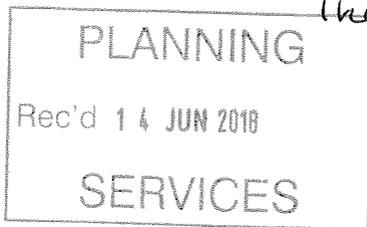
5) ^{Loss of} Wild life - Loss of Trees = in excessive numbers

Our local community see NO need for this proposed development. We do not want to be cut off during busy hours unable to leave our homes due to excessive traffic.

Yours sincerely



The Reddings,



Cheltenham

Glos

GL51 6TY

11.6.18.

CBC ref 18/01004/FUL

Dear Director of Planning,

I would like to object to the above planning application on land at North Road West and Grovefield Way Cheltenham, referenced above.

My objection is based on the following:-

- Increase in the amount of traffic causing more congestion and air pollution, which I know is a concern for our council.
- Lack of available parking as has already been shown by the BMW garage using 'Park + Ride' spaces for their staff. This problem will increase with more development.

- Road safety as the **Page 280** Golden Valley roundabout is already congested from this direction at peak times with no traffic light control on roads leading from Greenfield Way.

- Amount of supermarkets in the area are more than adequate with Asda and Morrisons, so the need for another one is completely unnecessary.

- There are already a good choice of jobs available in this area so vacancies will be filled by people having to travel to work by car with a need for parking and the problems of congestion and air pollution already mentioned.

- There is already empty office space at the Asda site.

I hope that you will take these factors into account and ~~avoid~~ ^{prevent} them ^{increasing} by rejecting this plan, which in its last application was rejected on similar grounds which are still very relevant.

ref - 18/01004 / FC PLANNING Cheltenham
Rec'd - 8 OCT 2018 Glos
94516TY
SERVICES

Dear Tracey Cews,

I would like to object to the above planning application on land at North Rd. West and Grovefield Way, Cheltenham. 18/01004 (FC)

My objection is based on the following:-

- An increase in traffic causing more congestion and air pollution which I know is a concern of the council.
- Lack of parking as has already been shown by the BMW garage using 'Park + Ride' spaces for members of staff.
- Road safety on the A40 roundabout which is already heavily congested at peak times with no traffic light access from roads leading from Grovefield Way.
- There are already two supermarkets in the area at Asda and Morrisons so the need for another one is unnecessary.

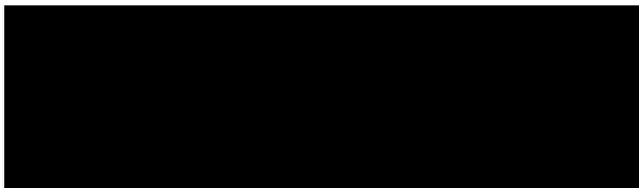
- There are already many jobs available for local people in this area. Vacancies will be filled by people having to drive to and park at the new outlets causing the problems already mentioned.

- There is already empty office space on the Asda side if there is a need for this.

- I understand the need to build more houses on green belt sites but not a need to build yet more shops and offices increasing the problems of congestion and pollution.

This can be avoided by rejecting this plan which in its last applications has been rejected on similar grounds which are still relevant.

Yours sincerely,



19 Heyson Road,

The Reddings
Cheltenham

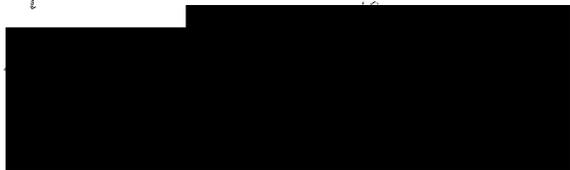
PLANNING
Rec'd 13 JUN 2018
SERVICES

June 12⁶¹⁵¹ 6¹⁰
2018

To: Chief Planning Officer
Cheltenham Borough Council.

My partner and I strongly oppose
the Aldi/Coles plan near the B116.
The town has not the infrastructure
to sustain further development in this
area. More traffic chaos would ~~be~~ take
place. The Shurdington Rd is bad
enough already. The air quality
in the Reddings is poor, especially when
there is no wind. You can smell
the petrol vapour in the air.
Remember, the Reddings has no
park. Nearly 4000 fields are vital to our
welfare.

cc



Objections to Aldi-2 re-application (18/01004/FUL)

KMP-1

My objections to the first Aldi application still apply and are attached as pdf file '**KMP-2 GrovefieldWay Objection**'.

In addition, I attach my comments submitted recently to the ongoing Cheltenham Local Plan concerning this Grovefield Way site, namely:

'KMP-3 CheltPlan-03-Employment Objections' and

'KMP-4 CheltPlan-01-Introduction Objections' (read **Section 20 - Superseded Policies**, i.e. the Retail policies).

I also attach my representation letter sent to CBC Planning in November 2017 (prior to the Local Plan consultation) concerning the correct handling of this unique town's distinctive Retail policies, as

'KMP-5 Retail Policy Objection'.

These (wise) existing Retail policies were retained by the JCS Examination; their update is now postponed for a forthcoming 'JCS Retail Review'; and accordingly they are not updated yet by the Cheltenham Local Plan. The 'Retail Review' should be allowed to complete.

In view of the many significant objections to the Cheltenham Local Plan, it now seems unlikely to be submitted straight to Examination without any further adjustment.

Therefore the objections to CBC officers' recommendation to permit a supermarket on this B1 Site need to be resolved through the Local Plan Inquiry. There is no need to determine this re-application in advance of that due public debate before an independent Inspector.

Nor is there any hurry to determine this re-application, (unless an indication is requested by the forthcoming Appeal inspector).

The applicant cannot meaningfully claim a 'duplicate' non-determination appeal.

Any further determination of this application needs to be by Planning Committee, not delegated to pre-committed officers (who spend far more time engaging with their developer "clients" than with residents/objectors).

One further objection to Retail at this location has emerged recently.

CBC has been Directed by DEFRA to address the NO2 'exceedance' on the section of A40 (Census Id: **77985**), which runs from the B4063 (**Arle Court roundabout**) to the A4013 **Benhall roundabout** with Princess Elizabeth Way).

In the context of expanding access to GCHQ (and to a CyberPark off Telstar Way) plus access to the JCS-approved Urban Extension of 'West Cheltenham', it makes no sense to increase supermarket traffic to an Aldi supermarket at Arle Court. That would attract numerous car trips from Hesters Way, Rowanfield and other districts, necessarily using this polluted section of the A40.

Objections to Supermarket & Nursery off Grovefield Way

(CBC: 16/02208/FUL ???)

A

For this negligibly "revised" application, I repeat my earlier objections, which for convenience are copied below, at **D**.

Further to those earlier comments, the following paragraphs (concerning this site) are extracts from:

- 1 my recent submissions to the JCS Inquiry (see **C**), and
- 2 my 'JCS & Local Plan' letter to CBC's Head of Planning (see **B**).

Summary:

Refuse on grounds of:

- 1 CBC Retail Policies, primarily RT1: site is outside any 'shopping centre' in the permissible hierarchy;
- 2 Green Belt modification remains contested within the JCS; GB status is therefore still in force;
- 3 Severe traffic impediment onto the SWDR (South West Distributor Road, i.e. Cheltenham's south-west **ring road**, Grovefield Way to Up Hatherley Way);
- 4 It is a poor fudge to claim that 'any old' employment use ('sui generis') will do, on this ideal office-approved site, with its ability to deliver a high ratio of jobs-per-hectare;
- 5 The latest JCS transport strategy, 'DS7', is very contested, and (unlike the preceding 'DS5') has no proposals for mitigating the impact of 'West Cheltenham' (i.e. Hayden cyber security centre) upon the key Arle Court junctions (A40).

There is easily enough cogent material for a vigorous and successful Reddings defence at any Appeal.

B

Extract from my letter to CBC Head of Planning, 29 August 2017:

2 Saved Retail Policies [For Policy text, see section **E** below]

Concerning the "immediate retail review", JCS evidence document **MM-35** states (in its 'Status of Policy' section) that:

"In the meantime, there should not be a policy vacuum."

Is this an imprecise way of conceding that Cheltenham's carefully evolved **Retail Policies** (and shopping centre selection hierarchy), which is 'saved' from the last Local Plan, will not be summarily scrapped by the JCS in advance of their proper reconsideration by the next Stage of the emerging Cheltenham Local Plan?

Presumably your word "vacuum" must mean for planning application purposes.

The current **Aldi application at The Reddings** (in Green Belt and **outside** any defined 'shopping area'), 16/02208/FUL, is a crucial instance needing Local Plan retail policy guidance.

Accordingly, your 'Planning Policy Team' needs to revise its 26th January 2017 advice, principally to review the glib give-away pronouncement of "**conformity with ... Policy RT1**" in the absence of any Local-Plan-proposed 'shopping district' boundary at Arle Court. **

The response to date has come in the form of a meeting with Philip Stephenson, CBC's Planning Policy Manager, on 11 September. **It is now my understanding that, even after JCS Approval, the RT Policies will remain in force UNTIL the JCS postponed 'Retail Review' (which may take another year) and the**

in-progress Cheltenham Local Plan are both Approved.

The whole issue of a proper **hierarchy** of 'shopping centres' (currently: Town Centre, then District, then Neighbourhood) remains an important policy provision for conserving the orderly townscape of historic Cheltenham. The NPPF does not invalidate 'Saved Policies', and no conflict has been demonstrated between Cheltenham's saved RT Policies and the NPPF.

Arle Court is not a defined 'shopping centre'; and Grovefield Way is detached from other retailing. (On the other hand, **Hesters Way 'District' Shopping Centre** for example lacks an 'anchor' superstore and could therefore benefit from an Aldi supermarket.)

****** I do still seek a written response from CBC Head of Planning to my challenge (above) to the Planning Policy Team's erroneous (over-simplistic) pronouncement of "**conformity with ... Policy RT1**".

C

Comments submitted to the JCS 'Main Modifications' consultation - **awaiting outcome**

PMM134 : Proposed Changes to Green Belt Boundary

I object to the removal from GB of the sliver of land at the north end of Grovefield Way, running alongside the Golden Valley Bypass (A40), for the following reasons:

This Green Belt land was released for development on Appeal solely for **B1** use.

However this has been partly eroded by CBC deciding to allow a BMW car dealership on part of the site.

Now, the remainder of the site ("Phase 2") is seeking permission for an **Aldi supermarket**, a drive-through Costa, a nursery, and some offices (maybe).

<https://publicaccess.cheltenham.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=OHYK0AELGEK00>

There is overwhelming local objection. (Mine came later, dated 18-Jan-2017, from '25 Timperley Way'.)

The housing estate at the junction of Grovefield Way and Cold Pool Lane (its spine road is Symphony Road) has been completed and occupied for several years, but this land (lying inside Cheltenham's 'ring road', and still in TBC's Badgeworth parish) is only now being removed from Green Belt by the JCS.

Accordingly, this 'BMW plus whatever' block of land (lying outside the Grovefield Way 'ring road') **need not be removed hastily from Green Belt now in the JCS, but should await its appropriate determination (and implementation) via CBC planning applications; and that can most sensibly be decided by a later Cheltenham Local Plan Inspector, as the land lies entirely within Cheltenham District.**

Deleting this land's GB status immediately, via the JCS, was proposed in Examination session by Paul Fong, MD of Hunter Page Planning, (agents for the site's developer).

Immediate GB release makes it too easy for the site to become ANY kind of "Employment", e.g. a supermarket (located outside any defined Retail zone), and makes it harder for residents (notably the Reddings Residents Association) to keep the Appeal permission to the intended **B1** use.

Immediate release may also weaken CBC's strip of Green Belt land at The Reddings (facing west towards Churchdown-Gloucester), which lies between Grovefield Way and Badgeworth Road, (i.e. south of North Road West).

I do not recall Paul Fong (MD of Hunter Page), when requesting verbally [in the JCS 'Green Belt' session on 9 July 2015] that the entire BMW-containing 'rectangle' be removed from Green Belt, explaining Hunter Page's interest in imminently progressing an application for an Aldi supermarket inside the undeveloped bulk of this **office-permitted** rectangle (B1-only permitted; i.e. no '*sui generis*' free-for-all).

In reply to that verbal request, the JCS officers raised no objection, even though they had not pre-considered and themselves proposed the removal of this land from Green Belt.

Unfortunately, this particular nibble at Green Belt (before full planning decision and implementation)

would make the Appeal's B1 offices restriction much easier to disregard.

This wedge-shaped site should be a small GB removal done by a future Cheltenham Local Plan. It is needlessly hasty to finalise this minor GB removal in the strategic plan, especially when we have not yet assessed whether North Road West can provide a sufficiently 'strong' boundary.

D

ver.01

Objections to Supermarket & Nursery off Grovesfield Way

(CBC: 16/02208/**FUL ???**)

1 'Hybrid' application not acceptable

1.1

This application is incorrectly described as 'Full', but the key office (B1) element is all Outline.

Any application for the remainder of this Green Belt site should not be "Hybrid", but Full only; and should not be partly vague and Outline.

Hybrid is at worst a trick, to secure Retail use and retain the option to further erode the Office element later, e.g. for Residential.

Any so-called "hybrid" (i.e. Full/Outline) scheme for the remainder of this site will be unreliable, because the supermarket would happen but probably never the offices.

An office permission nearby, adjacent to Asda, recently sought to convert to Housing arguing "no Office demand". However this situation may now change with the emerging 'Cyber Industries' development at nearby Hayden, adjoining GCHQ. That cornerstone JCS development should be allowed to proceed to JCS Adoption first.

2 'Gateway' site in Green Belt needs to await JCS outcome and its integration with Hayden Allocation

2.1

JCS document EXAM-114, proposing the "Removal of Grovesfield Way Site from the Green Belt" is not yet confirmed as a 'Main Modification', and if/when so, that Green Belt removal then needs to await its due JCS Consultation in early 2017.

Until then, the required 'very special circumstances' for general development in the Gloucestershire Green Belt have not been established.

2.2

As regards acceptable land uses for this site, it is most inconsistent with the JCS Evidence for this applicant's agent to be claiming that 80% of employment growth is non-B-Class, whilst the (two-year-long) JCS Examination is finalising major hectares of B-Class land as the primary provision appropriate to Cheltenham (and B-Class land is relatively more employment-dense).

The final JCS outcome on Employment land allocations should be awaited.

2.3

Any decision on the remainder of this site needs to await the revised JCS transport modelling evidence for these key linked corridors (A40, M5, A46-South), especially in the light of the recent emergence of a further Strategic Allocation (1100 houses plus 45 ha of Employment land) at Hayden (West Cheltenham).

The latest JCS Transport evidence is under 'Transport' at:

<http://www.gct-jcs.org/New-Evidence-Base-and-Associated-Documents/New-Evidence-Base.aspx>,

where the document '**Emerging JCS Transport Strategy Final**' of October 2016

<http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Emerging-JCS-Transport-Strategy-Final.pdf> states as follows:

Page 5 (**Diagram**) shows "**New or widen sections of Highway**" all the way around the western side of Cheltenham from the A46(South) to the A435 at Bishops Cleeve.

Page 8 then itemises the following:

- * New **grade separated junction** on A40 to the west of Arle Court
- * New dual carriageway linking A40 to A4019 – new access to West of Cheltenham development
- * New **link road** from new grade separated junction on A40 **to Grovefield Way**

A "grade separated" junction means split-level, i.e. a proposed distributor-grade road would need to connect to the Golden Valley Bypass (A40) alongside this site, (via a split-level junction), and then connect around/through this site to reach Grovefield Way (and onward to Up Hatherley Way and the A46-South), and also connect directly **northwards** into the Hayden strategic Allocation.

Therefore **Highways England (still) needs to be consulted** (not omitted) for this site's JCS-related highways impact, being so close to the SRN at M5-Junction11, and being on the key A46-A40 Link of Grovefield Way. HE already comments on the JCS developments at Cheltenham-North West and Hayden, which are nearby but are also not immediately on the SRN.

Highways England has asked for a three-months delay before determining the Cheltenham-NorthWest outline application; the same caution should be applied to this (largely outline) application.

3 Traffic impediment to Grovefield Way

3.1

Grovefield Way (GFW) is *de facto* Cheltenham's south-west Ring Road, providing the key link from the overloaded A46 (Shurdington Road) to the A40, **BUT it is only single carriageway** in each direction.

Already GFW queues and blocks other traffic movements, both approaching and through the 'two roundabouts', where GFW reaches the A40.

Retail traffic flowing directly off the minor roundabout (e.g. to/from B&Q), and traffic off Hatherley Lane (e.g. Asda) is viable, but NOT off GFW, which has too vital a function to be allowed to be clogged (needlessly, i.e. avoidably) by the very frequent traffic movements, turning in/out, and the queuing from an especially high-footfall supermarket.

3.2

Nursery traffic (both staff and parents) on/off GFW occurs at peak hours, when GFW needs to maintain maximum around-town flow, not become an end-point destination.

4 Retail and catering and nursery uses not authorised by the Appeal.

4.1

Further retail should not be sited here (in an isolated piece of threatened Green Belt) but needs to be integrated with the JCS Strategic housing sites (and should not undermine those sites' local retail provision).

4.2

This location is not in (or adjacent to) a defined 'Shopping District' in the Cheltenham Local Plan (either Saved or Emerging).

4.3

If there is no immediate demand for B1 Office use on the Grovefield Way/North Road West corner, just wait for the JCS-driven growth to sweep in. There is no haste to lose this very suitable B1 site to other uses (e.g. shopping).

This site is so well located for the principal bus and transport routes, that it needs no 'ancillary' uses to 'make it attractive'. When B1 growth does return to the county, it will return here first.

Moreover, the imminent GCC on-street-parking restrictions in extensive West Cheltenham (anti-commuter) are likely to drive considerable office employment out of Central Cheltenham.

4.4

A single-storey nursery is poor use of precious Green Belt land, especially when close to a five-storey BMW headquarters (which this relatively sunken site, alongside the embanked A40, is thereby deemed to be able to accommodate).

4.5

The 'waste' of most of this greenfield for surface car-parking should also be queried as best use of scarce land, which is also well located for the principal Gloucester-Cheltenham 94 high-frequency bus service.

5 Retail impact inadequately analysed.

5.1

The applicant's agent claims that "the application site is demonstrably the most appropriate location for the proposed development." Yet there are better-located sites for a modest scale supermarket, e.g. Coronation Square which awaits regeneration.

5.2

It is further claimed that "the proposal will not remotely adversely affect any other policy protected centre in Cheltenham." Yet Hardisty-Jones 'Economic Impact Assessment' is generalities rather than even containing one mention of the defined '**Shopping Centres**' nearby in Cheltenham Borough, notably: **Coronation Square, Up Hatherley**, (or even the *de facto* Asda shopping destination, albeit undesignated).

E

CBC's still valid and relevant Local Plan (2006) Retail Policies

POLICY RT 1

LOCATION OF RETAIL DEVELOPMENT

Objectives O6, O7 and O24

Retail development will be permitted, subject to the availability of suitable sites or buildings suitable for conversion, which relate to the role and function of retailing centres and their catchments only in the following sequence of locations:

- (a) the Central Shopping Area, subject to policy RT 2 (note 3);
- (b) the Montpellier Shopping Area or the High Street West End Shopping Area, subject to policy RT 2 (note 3);
- (c) elsewhere within the Core Commercial Area, subject to policy RT 1 (note 3);
- (d) **district or neighbourhood shopping centres**, subject to policy RT 3 (note 3);
- (e) out-of-centre sites which are **accessible by a regular choice of means of transport**, subject to policies RT 7 and CP 5 (note 3).

In considering the location of retail development, developers and operators should demonstrate flexibility and realism in format, design, scale and car parking.

Parts of Policy RT7 may also apply:

POLICY RT 7

RETAIL DEVELOPMENT IN OUT OF CENTRE LOCATIONS

Objective O6 and O24

Subject to policy RT 1, retail development (note 2) outside defined shopping areas will be permitted **only where:**

- (a) a need for the additional floorspace has been demonstrated (note 3), and the proposals:
- (b) **individually or in conjunction with other completed and permitted retail development, would not harm the vitality and viability of the town centre as a whole or of a district or neighbourhood centre;**

Objections - to Cheltenham Local Plan (2nd Tier), published February 12 2018

3 Employment (pp.9-25)

Policy EM3 : New Employment Allocations (pp.15-16)

*"Proposals for traditional **B class** employment uses **or Sui Generis** uses that exhibit the **characteristics** of traditional B class employment will be supported at these locations subject to being in accord with other relevant policies embodied within this Plan."*

Delete this gratuitous give-way, occurring prior to consideration of each application's Details.

E3 : Grovefield Way, The Reddings

The undeveloped remainder of this site should continue to be **restricted to B1** class, in accordance with the permission granted at Appeal.

Moreover, it was established through the recent JCS process that Cheltenham has a shortage of "high-quality office" premises.

One 'employment' use class which this site cannot become is any form of Retail, because this area is not recognised within Cheltenham's 'Retail Hierarchy' of locations in the Retained local plan policies.

Retail zonings are now subject to an immediate JCS 'Retail Review', which must be completed before any such retail sprawls can be granted.

Also, at this key gateway to Regency Cheltenham, CBC's folly of permitting a large element of 'car sales' should not be extended further across this prominent 6.4 ha site.

Objections - to Cheltenham Local Plan (2nd Tier), published February 12 2018

1 Introduction [& Procedure] (pages 1-4)

page 1, para. 1.3:

*"is the **final version** of the plan before being sent to the Planning Inspectorate"*

Thus there is to be **no consideration** by CBC of **any Objections** to their proposals, some of which have suddenly (and "finally") appeared just in this version (e.g. the Leckhampton Secondary school).

This is therefore intended to be a **de facto Submission version** of the Plan, which is improperly titled as being "Pre-Submission".

Regulation-19 does allow for changes following the Plan's consultation and prior to its submission for Inspection.

Before this Plan is Submitted, CBC (being aware of the likely challenges at Leckhampton and at a few other sites) has had time to be preparing the missing evidence, which the Inspector should immediately request.

It all needs to be published one month before any Examination starts, to allow objectors time to respond to any proposed adjustments (or 'reasoned' refusals to change).

In general, this Local Plan (which delivers so very little, simply because Cheltenham has virtually no spare developable land left within it), **can safely be idled in a siding until it has dealt properly and fairly with all its evaded issues and missing evidence.**

This is one (partial) mess with which there is very little need to rush.

Tewkesbury and Gloucester Local Plans could usefully catch up, especially for the unresolved cross-border issues, notably Secondary education provision.

DtC Paper

para. 3.7:

*"Through on-going public consultation and engagement, Gloucestershire County Council informed Cheltenham Borough that there would be a need arising for a secondary school in the **south** of Cheltenham. Through the development of the Cheltenham Plan it has been possible for a proposed designation of land at Leckhampton to be included in the plan for the use as a school. Both of the authorities will continue working together to achieve the best outcome possible."*

Gloucestershire County Council (GCC) is not an adjacent authority with which DtC applies.

Instead, GCC ought to have contributed far more actively to the JCS process, and even have participated as a partner authority.

At the recent JCS Examination, the key areas of **Transport** and **Infrastructure** were weakened by GCC's reticence, and this is now most evident concerning the Leckhampton Secondary school proposal, where GCC had its 'evidence' documents (Education Strategy Reports) already printed in early 2107, claiming that a further Secondary school was needed for Cheltenham (beyond and before the JCS-planned school at Cheltenham NorthWest), but chose to withhold that information from the JCS Examination.

GCC cannot now claim its unexamined proposal to be an 'outside' DtC input to Cheltenham which the town has to swallow into its Local Plan unscrutinised under "DtC".

This is unsound planning between Gloucestershire's planning tiers.

Moreover, GCC's education 'evidence' continues to hide from comprehensive publication of its county-wide Secondary education data.

Instead, there is just repetition of a simplistic single-angle claim (spin) concerning a Year-7 issue, which appears to be no more than a manageable two-year bulge (which it clearly was at the JCS stage in 2017, when absolutely no issue was raised).

Integrated Appraisal Report (by Enfusion)

"6.11

*The Cheltenham Plan comprises the same as the Preferred Options for the three themed Vision and Objectives – with **only minor amendments made as a result of consultation.**"*

Very little is ever changed by CBC planners following "consultation", except that 'surprise' items do get flipped in at the last-minute stage (when harder to oppose), e.g. a Kidnappers Lane school; increased housing numbers/density; LGS erosions.

The supporting document 'Statement of Consultation' is a paltry summary of the 'Preferred Options' consultation, focusing merely on numbers of responses rather than debating the substance of ideas/objections. It is hardly surprising that few changes ever follow.

"6.25

*At a late stage of plan-making and assessment, Gloucester County Council advised the need for a **secondary school** and that the **Leckhampton site was preferred.***

*This means that the proposed development changes from **around 330 dwellings** to around 200-250 dwellings plus the school.*

The implications for the overall findings of the SA are not significant: the quantum of housing remains sufficient that affordable units can be provided and maintains the major positive effects for SA objectives on housing for all; the provision of a new school will ensure that there is educational capacity for existing and new communities in the area into the longer term, thus confirming the likely positive effects for SA objectives on provision and access to services/facilities. The JCS and other Plan Policies will ensure that there are no significant negative effects arising from the change of proposed development."

Thus, school places and affordable housing are 'pluses', and no significant **negatives** can arise, because we have "policies" to "ensure" that.

This is lazy and tendentious reasoning, which no one should have to waste lifetime reading.

Various incredible figures have been 'overheard' since the JCS outline of "200 houses", even **370** houses.

The only sketch map that has been released (as published on Leglag's website), done by MillerHomes before the school was inserted, showed around 180 building 'blobs', which suggests a building density similar to or (allowing for the wide green corridor for the flooding Hatherley Brook) greater than the crammed Redrow estate at Farm Lane.

Yet all such 'planned' housing numbers are specious, in the absence of a detailed planning application.

In particular, any implication of needing to exceed two-storey development is likely to produce harm to the key views to the Cotswold Escarpment from the elevated section of Shurdington Road (A46).

20 Superseded Policies (pp.150-157)

p.155

(Local Plan 2006) **Retail Policies RT1 to RT5** are

"to be saved beyond the adoption of the JCS and Cheltenham Plan".

Thus, having agreed to retain the Retail Policies, for a JCS Review, CBC must not attempt in this Local Plan process to vary or undermine them, e.g. by a lax stance on allowing Retail the (B1-permitted) Employment Site '**E3**' at The Reddings.

Philip Stephenson,
Development Manager - Strategy, Cheltenham Borough Council

2 November 2017

Dear Mr. Stephenson,

Retail Policy RT7 - Aldi application 16/02208/FUL

In my objection to the Aldi application 16/02208/FUL, (found at: <https://publicaccess.cheltenham.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=OHYK0AELGEK00>, listed as '25 timperley way' on '19 Sep 2017'), I place reliance on stand-alone **clause (b) of Retail Policy RT-7**, (see bottom of page 5). (Objection document is attached for convenience.)

I understood from the JCS EiP that, because Retail issues are not yet concluded, Cheltenham's extant Retail Policies were to continue to be 'Saved' beyond the Adoption of the JCS.

However, in the Inspector's final draft of the Main Modifications, published on 26/10/17 as document 'MM41B' (at: <https://jointcorestrategy.org/main-modifications-examination-document-library>), the list of Cheltenham's 'Superseded Policies' under MM-134 on page 123 shows Policy RT-7 ('Retail Development in Out of Centre Locations') not to be retained but to be deleted.

Whilst a requirement to demonstrate "need", i.e. as in RT-7 **clause (a)**, may no longer be consistent with NPPF, the due consideration of retail impact on other defined 'shopping centres', by means of RT-7 clause (b), remains a valid concomitant of retained Policy RT-1 whereby historic Cheltenham has chosen to define an orderly 'retail hierarchy'.

Since clause (b) remains valid, the whole of RT-7 needs to continue to be 'Saved' until the policy is updated in the forthcoming Cheltenham Local Plan; meanwhile, to the extent that it conflicts with NPPF, clause (a) will simply not be usable for development control.

Cheltenham's JCS officers will have proffered to the Inspector this detailed list of Policies in Main Modification MM-134. Therefore, you should now be able to make this minor correction for the final pre-Adoption draft, in order to retain Policy RT-7.

In the 2006 Local Plan, Cheltenham's Policies were carefully crafted and hard won, in part to preserve the ordered townscape of this most complete Regency town from scattered commercial startups.

Locating retail along Grovefield Way, outside any designated shopping 'centre' (the nearest District 'centres' being at Up Hatherley and Coronation Square), would undermine the established hierarchy of shopping centres.

The forthcoming Cheltenham Local Plan (a mere couple of months away) seems likely to acknowledge the nearby Asda, B&Q and Home Bargains stores (off Hatherley Lane) as an officially recognised (not just *de facto*) shopping centre; but the extension of that centre's retail envelope along Grovefield Way is neither automatic nor uncontroversial, pending Local Plan consultation and Examination.

The Aldi proposal must not be allowed to evade the full application of all Cheltenham's 'Saved' Retail policies, i.e. those which are not entirely and unarguably invalidated by NPPF.

Yours sincerely,


Cc:
Tracey Crews, Head of Planning, CBC
Ian Kemp, JCS Programme Officer



8 Old Reddings Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SD

12 June 2018

Dear Mr Joe Seymour

Revised planning application – CBC ref: 18/01004/FUL – for the development of the Grovefield Way site.

We wish to register our strongest possible objection to this application for the following reasons:

Existing local retail and Restaurants

- The local community is already very well served with very local supermarkets including, ASDA, Morrisons and Home Bargains. Restaurants are well provided locally with ASDA, Morrisons, Travelodge, Jurys Inn and the drive through KFC.

Traffic Problems

- Grovefield Way suffers high congestion during protracted rush hours with the traffic backing up from the Arle Court roundabout to the Grovefield Way/ Reddings Road roundabout. To add another supermarket (Aldi) with its long opening hours, along with other businesses will only exacerbate current traffic problems. Grovefield Way, North Road West and Reddings Road are already being turned into rat runs.

Parking

- The unsightly BMW showroom / garage was built on greenbelt land without any adequate parking facilities for its employees. The fact that BMW has to rent approximately 60 parking spaces on the Park and Ride site, which together with approx. 90 spaces rented by Ultra has rendered the efficiency of the Park and Ride extremely poor because of inadequate parking spaces!

Employees of BMW are also parking in local roads and on grass kerbs.

What confidence have we that Aldi and the other business sites for this proposed development would provide adequate parking for its employees and customers. On current experience, NIL.

Pollution

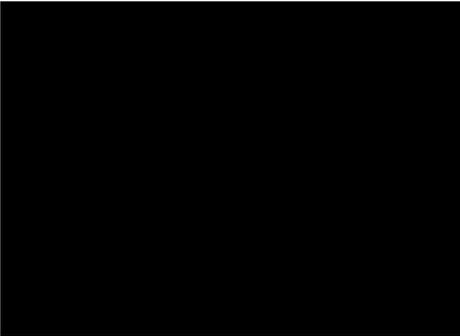
- Many people in the Reddings area are experiencing unpleasant levels of pollution from the growing traffic problems.

Over Development of a once pleasant rural area

- The weakness shown by CBC Planning Dept. to control inappropriate local developments (including garden grabbing), whereby developers have ridden roughshod over planning rules and been allowed to get away with it gives local residents no confidence in controls over these ongoing, **unwanted developments**.
- We understand that £2.1 m of Section 106 money was provided by ASDA and BMW, without any of it being used to compensate the problems cause by over development of this once semi-rural location.

The local community see no need for this proposed development and do not need it!

Yours sincerely



Mr Joe Seymour
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham
GL50 9SA

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29 May 2018



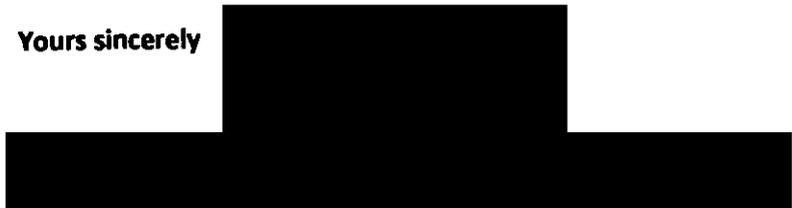
Dear Mr Seymour
Planning reference 18/1004/FUL

I wish to object to the above hybrid planning application for the following reasons:

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green field development is ever permissible. Office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity? And how much demand is there for a drive through coffee shop which is probably also going to generate more litter, of which there is already a vast amount all along the A40 leading into Cheltenham.
2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area?
3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. I moved into Wade Court on Hatherley Lane in 2001 and have seen a huge rise in traffic, particularly since Asda opened. Despite assurances that traffic calming and management measures would be put in place, none have been implemented and the situation will worsen with the proposed development. I have had asthma for a number of years but last year this had developed into Chronic Obstructive Pulmonary Disease and I'm certain that the increased pollution caused by the traffic has exacerbated this. In addition, from a planning perspective, it seems to me that the roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. The impact on existing housing and residents in terms of access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.
- 4 Parking - there is already a big problem with parking along Hatherley Lane which made manoeuvring out of Wade Court difficult and dangerous. The very limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on the site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders like me. The proposed development is bound to generate more misuse of the car park.

The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed hybrid planning application is refused.

Yours sincerely



Ms E Pickernell
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham GL50 9SA

Page 297

2 Lypiatt Terrace
Cheltenham
GL50 2SX

5th Sept 2017



Dear Ms Pickernell

Planning reference 16/02208/FUL

I wish to object to the above hybrid planning application for the following reasons:

1. Development of a greenfield site. It does not seem to me that there is sufficient demonstration of need for more employment which is one of the "very special circumstances" in which green field development is ever permissible. Office space that has been built as part of the ASDA development is still empty - why therefore build yet more? Is another nursery needed when there is at least one other in the immediate vicinity? And how much demand is there for a drive through coffee shop which is probably also going to generate more litter, of which there is already a vast amount all along the A40 leading into Cheltenham.
2. Over supply of retail provision - is there a need for another Aldi store when the existing one on the Tewkesbury Road has been considerably extended? Is yet another supermarket needed when there is already a Morrisons and Asda in the area?
3. The proposed development will generate yet more noise, pollution and congestion in an area which has seen a very considerable increase in all three since the development of B and Q, Asda, KFC and other retail development. My mother moved into Wade Court on Hatherley Lane in 2001 and have seen a huge rise in traffic, particularly since Asda opened. Despite assurances that traffic calming and management measures would be put in place, none have been implemented and the situation will worsen with the proposed development. She has had asthma for a number of years but last year this had developed into Chronic Obstructive Pulmonary Disease and I'm certain that the increased pollution caused by the traffic has exacerbated this. In addition, it seems to me that the roads and infrastructure in the area are simply not up to job of supporting the size and nature of the proposed development. The impact on existing housing and residents in terms of access and quality of life will be detrimental, the risk and impact of flooding will increase and the effect on wildlife and biodiversity will be negative.
4. Parking - there is already a big problem with parking along Hatherley Lane which made manoeuvring out of Wade Court difficult and dangerous. The very limited restrictions that have been introduced in the last year or so were the result of a long campaign by local residents and have really only tinkered at the edges of the problem. This will worsen with the arrival of yet more retail outlets and office space as it seems that there is never enough parking provided for any new development and the overflow simply displaces into the surrounding neighbourhood. In addition, the proposed development will put even more pressure on the Park and Ride car park which is already used regularly by employees of the BMW site (I understand that, incomprehensibly, their employees are not allowed to park on the site), GCHQ and other businesses along the Hatherley Lane. These employees regard the Park and Ride as a free car park and this severely limits its use for bona fide park and riders like my mother. The proposed development is bound to generate more misuse of the car park.
5. The proposed development is clearly in contravention of Local Plan Policy CP3 which seeks to promote sustainable environments. It will harm the setting of Cheltenham and the landscape and will not enhance the built environment or promote biodiversity. I submit that the proposed hybrid planning application is refused.

Yours sincerely

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Introduction

1. There is no objection to a B1 development on this site. To date over this and the previous application there have been well over 500 objections raised by residents. The removal of Costa is welcomed, but we must refer to all of our previous comments submitted in respect of this application, the previous application, where they remain unaddressed in the evidence and detail submitted in support of this application. We discuss our concerns below:

Extant outline permission for B1

2. It is accepted that the submitted reports and analysis are based on comparison with “fall back” extant 2014 permission for B1. However, that permission is OUTLINE only. A FULL application is required before any work can start on site and that application would be subject to the same scrutiny as this detailed application is. We also note that the extant OUTLINE permission expires on 23 July 2019.
3. Since 2014, the NPPF has been revised, and the JCS adopted. A new Local Plan has been prepared and forwarded to the inspector. However, the existing 2006 retail policies for Cheltenham are retained.
4. The JCS will have significant repercussions for traffic on Grovefield Way arising from doubling of Park and Ride capacity to 1000 cars, to service the Cyber Park. The Park and Ride is adjacent to this site and is relevant to considerations on this application
5. The Cyber Park traffic evidence to the JCS identifies that a 4-way Junction 10 is required for the development to be viable. CBC Cyber Park team identify that it won't happen until 2025 at the earliest and is likely not to be complete before expiry of the JCS in 2031. In the interim, as the development progresses, the A40 and Grovefield Way (GFW) will have the equivalent of do-nothing/do-minimum scenarios, which will raise traffic flows through Arle Court Roundabout (ACR) to 187% of capacity, and has no proposals for mitigating this impact. There is no account taken for recent variations in traffic conditions on Grovefield Way arising from BMW on this site or from other permissions granted since 2013, which is the date from which the GCC traffic evidence is derived.
6. The 2007 inspector report on this site was strictly restricted to B Class development in the greenbelt, at the request of this applicant. No extrapolation is possible. The inspector anticipated a low rise development with occasional glimpses through trees and hedges. An appeal on the previous application is in progress. It would be wrong to second-guess the inspector on the current appeal. The examination will commence for 6 days on 8 January 2019.
7. If the extant 2014 permission was “FULL”, then the site would be deliverable and would represent a viable fall-back position. However, it is OUTLINE only and a full application would still need to pass the same “detail” tests as this application. Only limited credence can be paid to it.
8. In the light of the above, we make our comments:

Is there a policy case for non-B1 use on this B1-approved site?

1. The 2007 appeal is restricted to B1 only.
2. The outcome of the inspector's hearing on previous refused hybrid application is not known and must not be second-guessed.
3. The retail policy review/evidence for the JCS has not yet been written. The extant retail policies are saved. The JCS states that until the “*immediate retail review*” is ready “*there should not be a policy vacuum*”, i.e., Cheltenham's carefully-evolved retail policies and shopping centre selection hierarchy is saved and is not summarily scrapped by the JCS, or the emerging Local Plan.
4. This site is outside any defined “shopping area”.
5. There is presently no JCS or Local Plan proposal, or designation, for a “shopping district” at Arle Court. Conformity with Policy RT1 for this hybrid proposal is therefore contested.
6. In respect of hierarchy of shopping centres, i.e., town, then district then neighbourhood, the existing policies create an important policy to preserve the orderly townscape of historic Cheltenham. The NPPF does not invalidate “saved policies”, and no conflict between the Cheltenham saved policies and the NPPF has been demonstrated.
7. The existing retail areas near to the site are not a defined “shopping centre” and this site is physically separated from that area by the South West Distributor Road (Grovefield Way). So there are no precedents set.
8. This application is incorrectly described as “Full”, because the key B1 job-creating portion (Phase 3) is all outline only. A significant portion of the site approved by the inspector in 2007 for B class usage has already been given over to Sui Generis in the form of the much-maligned BMW garage and show room.

- Page 300
9. BMW has resulted in the loss of land earmarked for the Park and Ride extension, which was the key reason for determining an “exceptional reason” to permit the B class development. The other key feature in the inspector’s decision was the apparent need for a large B class site in Cheltenham. Subsequent studies suggest that the need for B Class sites in Cheltenham has become more acute since then.
 10. Accordingly, this application should be Full only, not be Hybrid and outline, especially as the applicant’s submitted reports identify some difficulties with the Phase 3 OUTLINE portion, particularly in relation to surface water.
 11. The Hybrid portion of the application offers significant potential to secure wider retail use on the site, to the detriment of the office element.
 12. On the nearby site, adjacent to Pure Offices and Asda, there is a current application for B1 offices instead of the extant permissioned 27 houses. TRRA are supporting that application following a pre-application consultation with them. In this application and in support of the previous refused application, the developer/agent reported to us significant B1 interest, hence the proposed change of use. In the interim, overwhelming interest in B1 offices is reported on Honeybourne Place offices, and Ecclesiastical Insurance are relocating after a long search for suitable alternative B1 offices.
 13. There are 2 named users for office Nos 5 and 1 on this application site. One of those is the agent. The other is Bloor Homes, whose existing regional headquarters are in Tewkesbury, purpose-built by them in 2007, occupying an area of 461m² (note new office 1 has an area of 2322m²). In 2014 Bloor Homes employed approximately 37 people.
 14. At the planning committee on 15 December 2017, the previous hybrid scheme was rejected with wide agreement that the site “had not decided what it wanted to be”. It still hasn’t, and that is a significant concern for residents.
 15. In 2007 the whole site was granted permission for an area of Park and Ride extension and 22,000m² of B1 office, generating 1100 jobs. When the option on the Park and Ride expired, an application for more B1 offices was approved, with a predicted 1200 new full-time jobs. That proposal extended to the whole 6.35 Ha site. BMW occupies 2.2 Ha or 34.6% of the original site as Sui Generis class. The balance of B1 on the site in this application is 4.15 Ha. The non-B1 use area of this application, including the Aldi, Happy Days Nursery and their associated parking is approximately 10,900m² or 1.1 Ha. The phase 2 site area for which detailed permission is sought is approximately 2.5 Ha. The claim that A and D class use will occupy only a small percentage of the site is not understood. BMW, Happy Days Nursery and Aldi will occupy 2.2 Ha plus 1.1 Ha = 3.3 Ha of the whole site, i.e. $3.3/6.35 = 52\%$. If phase 2 is built, Aldi and Happy Days Nursery will occupy $1.1/2.5 \text{ Ha} = 44\%$ of the phase 2 area of the site. Until Phase 3 B1 offices are built, non B1 (Sui Generis, A and D class) will occupy 77% of the developed site. If Phase 3 is developed as B1 offices, then A, D and Sui Generis class will still occupy 52% of the whole site. We do not believe that these were the exceptional reasons for B class development in the greenbelt that the inspector envisaged or permitted in 2007.
 16. There seems to be a circular argument relating to non-B1 use in respect of retail. No policy reasons for the D class childcare are advanced by CBC, any of the consultees or the applicant that we can see.
 17. The application of the retained retail policy RT1 to this site can only relate to “*out of centre sites accessible to regular means of transport, subject to RT7*”. RT7 says “permission outside defined shopping areas will only be permitted where it will not harm a district or neighbour centre”. However, the RT7 policy is said to have been deleted in the JCT. This site is very close to 2 large “destination” supermarkets (Asda and Morrisons) and also to a number of small “top-up” shops in Benhall and Up Hatherley. None of these “top up” shops are mentioned in CBC or the applicant’s reports, and none are classified as district or neighbourhood shopping areas. CBC and the applicant say that no consideration need be given to them because they are not designated district or neighbourhood shopping centres, so they are not protected by policy, even though many of these shops have served the residents in the area well for 50 years or more. The applicant’s economic report for Aldi identifies that 80% of its trade will be “stolen” from these stores. Job losses at those existing stores are inevitable if Aldi succeeds. The sequential test of the retail policies is then used in an attempt to justify this B1 site for retail use on the previous application. It fails the test. The NPPF clearly states that if the sequential test is failed, then the site is inappropriate, yet this is waived. The only remaining policy justification for the use of this site for retail then turns on “*accessible by a regular choice of transport*”. The applicant and Strategic Land Use Team make a case for this. The same agent and experts that represented BMW now submit reports and argument in support of this application, including another travel plan. However, the submitted travel plan for BMW then failed completely within weeks and has caused unresolved severe road congestion, street parking problems for residents and well-publicised problems at the adjoining Park and Ride. Ultimately, this is now resulting in the need for public expenditure to fit barriers there to try and overcome the problem.

18. The tests for RT1 are therefore not met and we s**Page 301** completely inappropriate for this non-designated area, until such time that new retail policies have been drafted, consulted upon and a retail policy for this area of Cheltenham is agreed.
19. On 24 July 2018, ie prior to the applicant making his latest submission on 18 September and 25 September, the NPPF was revised. Strategic Land Use Team comments on 28 June 2018 do not now relate to this scheme and use the superseded NPPF to support the application. As such, the Strategic Land Use Team report needs to be revised and made relevant to this application.
20. NPPF paragraph 92d states that it should be ensured that local shops, facilities and services are able to develop and be retained for the benefit of the community. We believe that permitting D and A class development on the site will severely prejudice the survival of many local businesses and will certainly not allow them to develop.
21. Other local established shopping areas, such as Coronation Square, require an anchor store. Aldi would surely be welcome; further it would be located on a well-established commuter road where many journeys would be linked and has a barely-used car park at the rear of the centre which would easily accommodate shoppers.
22. If this “large” Aldi store is meant to service the offices, it is disproportionately large. Residents have been clear that the area is already well served by supermarkets. There will be no “linked” trips associated with the B1 offices and Aldi over the weekend/evening periods, so vehicles will be being attracted into the area, contrary to the principals of modal shift. If the supermarket is intended to service the B1 development, it should be strictly restricted to 08:00 hours to 19:00 hours, Monday to Friday only.

Summary – planning policy

23. If a planning policy case is to be made for variation from B class to A and D classes, then we believe it has not yet been presented either in compliance with the retained retail policies, or the NPPF, for the reasons set out above.

Economic impact

24. As we have previously set out, the applicant’s claim to create 1039 jobs is misleading. The recognised sqm area per B1 full time employee is 18.3m². This is the allowance made in all previous calculations made for this site, until the first hybrid application was made in December 2016. In order to support the applicant’s claim for employment numbers in the B1 offices, the space per employee has been reduced to 13.8m² by the applicant. This is a reduction of 25%. Applying the same 13.8m²/employee area to the original 22,000m² application would create 1594 full time jobs, not the 1200 claimed at the time. Similarly, the extant 16,800m² outline application would create 1217 full time jobs. So great care is required in making comparisons. The applicant’s use of both ft² and m² figures is also confusing. The applicant’s submitted letters of intent do not indicate the number of employees that will actually be occupying office numbers 5 and 1. Ridge/Hunter Page refer to “*potential to accommodate between 40-50 people in office no 5*”. Fifty person occupancy would translate to 14.9m² per employee, whilst an occupancy of 40 people amounts to 18.6m² per employee. In 2014, the prospective occupants of office no 1, Bloor Homes, told planners that they were employing 37 people in an office with an area of 461m². With an occupancy density of 13.8m² per employee, office 1 should provide 168 full time jobs by the applicant’s reckoning. We note that Bloor’s current regional office is in Tewkesbury and that the Ridge/Hunter Page office is in Cheltenham. Relocation of Ridge/Hunter Page is therefore job-neutral for the area in all respects, whilst the relocation of Bloor is from within the JCS area. We are mindful that there was much publicity about new job creation in the applicant’s previous scheme, BMW. In the event, most of the jobs weren’t in fact actually new, but came from other branches which were closed (with one being turned into a Lidl and Starbucks).
25. The discussions in the previous paragraph show that the claims for numbers of jobs created are somewhat subjective on this site, and the economic report must be treated with caution. Whatever the “correct” density for full time employment on the site might be, it is not equitable to compare predictions of full time employment between the extant outline permission and this proposal using different occupancy area rates for employees. If the 18.3m² rate is correct, B1 employment for this proposal will only provide 322 full time jobs. Adding the 25 predicted jobs for Happy Days Nursery and 26 jobs for Aldi, this makes a total of 373 full time jobs, not 428 that Hardisty Jones Associates predict. If an occupancy rate of 13.8m² per employee is correct, then a direct comparison with the extant B1 outline permission would create 1217 full time jobs (not 1100), meaning that the hybrid proposal results in a net loss of 178 full time jobs, relative to the extant permissions. This represents a loss to the local economy of £6.134m in annual wages (using the figures given in table 1 of the applicant’s economic impact assessment).

26. Over a combined floor area of 2245m², Aldi and Happy Days Nursery generate a projected 51 full time jobs. Using the applicant's occupancy density of 13.8m² per job for B1, 163 full time B1 jobs would be created, i.e., an increase of 111 jobs for the same footprint. The inclusion of the A class and D class buildings on this site does not therefore seem to provide any obvious economic benefit to Cheltenham or JCS area compared to the extant B1 business park that has been granted permission already.
27. The construction phase impacts are considered neutral between the extant outline permission and the proposed hybrid scheme. Both will generate broadly similar impacts and revenue.
28. It is suggested by the applicant that the Aldi supermarket and nursery are necessary to bring forward and promote the B1 development. However, the area is already served by existing nurseries and childminders and has an abundant supply of destination and top-up supermarkets. Most are available within a maximum 5 minutes' walk of the site and all are available within 5 minutes' drive on a "linked trip".
29. Adjacent to the existing Pure Offices/Asda site, 5 minutes' walk away from this site, developers, Robert Hitchens, are seeking permission to build B1 offices, instead of the permissioned 27 houses because of interest in B1 in the area. On the previous hybrid application for this site (refused in December 2017), the applicant advised that there was a great deal of interest in the proposed B1 offices on the proposed site. In September 2018, more than 45 property agents from Bristol, Swindon and the South West came to Cheltenham to tour the construction of 64,000ft² of B1 office space which is being constructed at Honeybourne Place. The B1 offices will be ready in 2019 and are located in an area which is roughly equal to The Reddings and no retail or childcare elements are included. The Honeybourne Place development is described as having potential occupiers from within the town and new entrants to Cheltenham. It will offer available space ranging between 1000 and 7000ft² on the ground floor to 11,600ft² on upper floors. Both Honeybourne Place and this site are in locations with good transport links and both have similar architectural features, including limestone, large glass screens and cladding. Honeybourne Place is also close to existing supermarkets, and similar the facilities to those that already exist close this proposed site. It is predicted to attract rents of £30 per ft². The significant difference is that the developers of Honeybourne Place have "backed themselves" and constructed the building to attract the tenants. In the Ridge/Hunter Page letter of 21 September 2018, Mr Fong says that *"there are limited opportunities to acquire modern office accommodation within Cheltenham simply because very little has been built over the previous years..... as a consequence of the existing stock that does remain is quickly taken up and office rents have risen considerably and become prohibitively expensive for many businesses"*. In the December 2017 committee debate, Councillor Wheeler identified sources at GCHQ which said if it was built they would be very interested. All of the foregoing suggests that there is considerable demand for B1 offices. This was recognised by the inspector in 2007 and formed one of the exceptional reasons for permitting development in the greenbelt. If this hybrid application is approved then at completion of phase 2, 77% of the site will be occupied by Sui Generis, A and D class buildings and only 23% will be B1. Bloor will be relocating within the JCS area to occupy office 1 and Ridge will be relocating from a Cheltenham town centre office to office 5, leaving only office 2 as a speculative development offering 2756m² of B1 office. We are concerned that this demonstrates little determination on the part of the applicant to develop a B1 business park.
30. Since the hard-won permission to build prime B1 offices on prime greenbelt was awarded in 2007, 33% of the site has already been given over to Sui Generis purposes for the BMW garage and showroom. It was said this would bring forward B1 development and create jobs. It has not. Subsequently, the applicant has sought to make a case that a drive-through Costa, an Aldi supermarket and childcare facility are necessary to bring forward B1 offices, but they only suggest that they will build phase 3 at some time, following completion of the A class and D class buildings. Further, having constructed the BMW building on a part of the site that the applicant seeks to separate from this application, the applicant has managed to wrestle this portion of the site out of the greenbelt before it has been built. Following granting of planning permission for the BMW development, numerous variations were then applied for and permitted including to: make the building higher; longer; vary the fencing; cut down protected trees; and redesign the stormwater storage and disposal because the "experts" reports submitted to the planning committee were wrong. With the applicant committing to only constructing a small percentage of offices as a part of the full application whilst leveraging the figures to promote and advocate it by promising "jam tomorrow" with the B1 development in phase 3, there is very real concern that once A class and D class as well as Sui Generis have been permissioned on this important B1 site, further use classes will be introduced at the expense of the B1 employment for which this important greenbelt boundary buffer was sacrificed.

RESIDENTS' CONCERNS AND ABSENCE OF CONSULTATION

Application form

31. There is no application form available on CBC website. As such, residents and others, including the officers and planning committee, are unable to determine the opening hours proposed. Previously the opening hours for Costa (A3 class) were 05:30 to 23:00 daily. This was considered unreasonable and excessive and must not be implied in any permission that may be granted in respect of this application.
32. Confirmation of opening hours for Aldi, Happy Days and the B1 offices and the proposed delivery times and schedules must be clearly stated by the applicant.

Environmental

33. Since the site strip and stockpiling of soil on this site associated with the BMW works, those areas of the site that have not been used as a builders' yard have re-established their former greenbelt condition and some of the wildlife and fauna that was displaced during the BMW works has returned. These include deer, hedgehogs, slow worms, bats and many insects and protected bird species. It is noted that there has been no environmental report submitted or requested, and no environmental consultee request has been made. This is not acceptable and a new report/consultation is required.
34. The proposal does not seem to include provision of any bat/mammal/insect boxes or habitats, save for gabions, to replace the lost natural habitats.
35. The BMW works on this site led to extensive removal of natural habitat hedging and trees. The applicant seems to state that the existing mature, dense, tall and well-established hedging and trees along the North Road West boundary can and will be retained and enhanced. However, reference to the applicant's drawings, in particular, Section B-B, J-J (2/2), Section H-H (2/2), section G-G (2/2) and section D-D (2/2), Section C-C (2/2), clearly show that North Road West will be at considerably higher level than the excavated ground level that is proposed for Aldi. This is achieved by forming a sloped embankment between them. This is best illustrated on the Bayley's Landscape Architect's drawing entitled "Landscape sections" (drawing reference DLA.175.L.13.RevB). This drawing shows Aldi and profiled embankment, together with North Road West. The site boundary position is marked, but the re-profiling of the soil to form an embankment extends beyond the site boundary to the kerb edge. It seems that an embankment of between 1.5-2m depth is being formed. It is not understood how this can be formed, and the existing hedge can still be retained. The excavation work will surely require removal of the native hedge, but in any event, excavation this close to the existing hedging and trees is contrary to the relevant BS5837-2012 Trees in Relation to Building. Comments from the Tree Officer and applicant are requested.
36. Non-native trees and shrubs seem to be being proposed. There are no comments regarding the effect of this policy which will result in the loss of indigenous environment. Will the non-indigenous planting that is proposed have a positive effect upon the existing native mammals, flora, fauna, insects and birds? We would be pleased to hear from an appropriate consultee on the matter.
37. Light intrusion is a significant concern. Vehicle lights traversing the Aldi and office 5 car parks and those leaving the site, will shine directly into the houses and gardens opposite. This will be exacerbated in winter when daylight hours are shorter and the deciduous hedgerow on the opposite side of Grovefield Way has shed its leaves. Proposed tree screening for the site will not mitigate the problem as it is currently shown.
38. Background light pollution from the visibility and security lighting on the car parks and buildings is similarly of concern. Aldi in particular will require high levels of security compared to B1 offices, and the extended opening hours beyond those of a B1 office, particularly into the evenings and over weekends are a significant concern. Consequently, retail will require much greater external lighting than the extant B1. No details are provided with regard to the provisions to mitigate light pollution from the car park lighting, nor whether buildings will remain lit overnight, as unenvironmentally-friendly BMW currently do. The scheme approved by the inspector in 2007 included light purging shutters to protect residents from light pollution. Comment from the Environmental Health office and applicant would be welcome.
39. Reflection of headlights and sunlight of the glazed facades, particularly of office 5, require consideration in terms of potential road hazard/nuisance to residents.

40. No roof plans have been submitted. This is of course have much glazing and will attract a good deal of solar gain. There is no indication of how this will be dealt with. Lifts are shown in the building, but there is no indication of where plant will be located.
41. There is no indication of how ventilation is to be provided to the buildings. It seems very likely to us that air conditioning will be required and air source heating may also be provided. Certainly, we would expect some Photovoltaic cells to be provided on the roofs to offset carbon emissions and comply with Part L of the Building Regulations. Presently, there is no acoustic screening shown on the roofs, only a small partial parapet, so there is no architectural detailing of how acoustic screening would be provided. Further, the acoustic report deals only with the external freezer plant for Aldi and there is no mention of mechanical or electrical equipment requirements and noise for the offices or Happy Days Nursery. A revised acoustic report is required. Comment should be sought from the Environmental Health team.
42. A current application 18/01180/FUL for the erection of three-storey B1 office buildings to the rear of Nuffield Hospital/adjacent to Asda and Pure Offices has been subjected to considerable, vigorous environmental investigation. Drainage calculations, noise assessments, external light assessments, sun path assessments, amongst other specialist reports and drawings have been requested by CBC officers and consultees, and they have been provided. In that application, the roof heating and cooling plant is to be screened by the provision of 3m high louvered panels on the roof around the plant area. Unscreened, the plant noise emission is in the region of 70 decibels when heating and 64 decibels when cooling. With the acoustic screening, this is reduced to a range of between 40 decibels to 34 decibels. Further design statements and submissions are required from the applicant and the Environmental Health team to clarify please.
43. The present acoustic assessment report refers to background noise monitoring that was derived prior to the opening of BMW. Since BMW opened, Grovefield Way is regularly backed up from the Park and Ride roundabout to The Reddings roundabout and it can take over 20 minutes to make that short journey during rush hour. Grovefield Way is often congested for between 3-4 hours each day (Monday to Friday) during rush hour, most significantly, during the afternoon periods between 15:30 to 16:30 hours. This can be verified by simple reference to traffic data on googlemaps). The noise from the stationary/slowly-moving traffic is considerable and beyond the level at which normal conversation can be held walking along the pavement. In some instances, the pavement is not very far from some of the residents' houses. The acoustic report is therefore now out-of-date and misleading. A further updated report must be submitted.
44. The acoustic report does not detail the noise intrusion of reversing vehicle sirens. This omission must be rectified and the effect on residents should be determined in relation to the delivery plan proposals for the A class and D class buildings. Presently no firm details are provided in respect of delivery times.
45. The stationary traffic referred to above will be significantly exacerbated by the "fall-back" extant outline permission for a B1 development. The traffic analysis projects in the region of an additional 600 vehicle movements during the rush hour period on Grovefield Way for this development. The congestion on Grovefield Way (which is the South West Distributor road) will inevitably become worse and the increase in stationary traffic over longer periods of time will further raise the local pollution levels, which are already causing a significant concern for residents. There is no analysis or comment offered by the applicant or Environmental Health officers in this connection. Residents' concern is further exacerbated by the applicant's traffic monitoring having been undertaken prior to BMW opening and during a non-neutral month (early July) when people that are not tied to school holidays by children take their holidays (as they do in September), thereby significantly reducing the traffic. Further, the figures reported in the traffic assessment analysis assume a modal shift. These same consultants produced a broadly similar report and modal shift projections, based upon the travel plan submitted for BMW. However, BMW reported to councillors shortly after opening that they have been unable to implement it. Consequently, there are very many more traffic movements, more stationary traffic and parking issues than these "experts" predicted then, and more than they model now. CBC have been asked to enforce the travel plan with BMW, but have failed to do so. It is suspected that the planning condition that BMW employ a part time travel co-ordinator has also not been complied with. A realistic up-to-date traffic survey and assessment which models actual current traffic (much of it introduced by this applicant on the BMW site), is required before the applicant's traffic analysis, reports and predictions can be accepted by CBC officers and the residents.

46. All of the “expert” projections and predictions are Page 305 options regarding the future of phase 3. However, the applicant does not significantly commit themselves, and only requests outline permission. The previous hybrid application which was refused in December 2017 contained a number of statutory undertakings which this application does not. With a significant history of variation applications on this site having previously been made (to the detriment of residents), statutory undertakings or preferably irrevocable covenants on the site usage to ensure that only B1 development permission and no further classes of development will ever occur on the site would be welcome by residents.
47. Happy Days Nursery receives very little comment from the applicant in support of its introduction, even though its inclusion and location on the site has been a matter of considerable concern to residents and to the planning committee in December 2017. There is presently much debate around the harmful effects of exhaust emissions on young children. It is proposed to introduce a nursery where children from 4 months upwards will be located in a building for up to 8 hours per day (07:00 to 19:00 hours). That building is to be located in the middle of a car park which is flanked by the South West Distributor road (Grovefield Way), the A40, the M5, the Arle Court roundabout, the Park and Ride, BMW garage, an Aldi car park (where up to 90 vehicle movements per hour are predicted). No pollution monitoring has been undertaken despite there being considerable medical concerns for the developmental and mental wellbeing of infants/young children. Similar medical concerns are raised in respect of asthma conditions in young children. Comment from the Environmental Officer, together with pollution monitoring that is modelled to the site (the pollution will be trapped and corralled between these tall buildings) should be requested and verified.
48. It is noted that one of the key aims of the NPPF is to support health and wellbeing. We believe it absolutely vital that a formal assessment of the health and wellbeing of the potential occupants of this nursery and residents is undertaken and submitted to the planning committee for consideration.

Trees, hedges and landscaping

49. As set out above, there is concern as to how the existing hedge on North Road West can be retained with the embankment ground profiling that is proposed to construct Aldi.
50. There is great concern at the comment that the North Road West hedge is to be flailed to a height of 2m. The Tree Officer comments that this will help make the new planting denser. However, it would be unreasonable to maintain the North Road West hedge at anything less than its current height in the future if the applicant is truly concerned with delivering a development that is sympathetic to its greenbelt surroundings (greenbelt origin) and the concerns of residents. If the new “enhanced” planting requires cutting back to encourage more dense growth, this can be done on a tree-by-tree, hedge-by-hedge basis, without prejudicing the existing hedgerow, which also supports much indigenous wildlife and will provide a refuge for wildlife whilst the rest of the development is constructed.
51. The landscape drawings and report do provide some indications of landscaping heights and densities when planted. However, the presentation of the data is misleading. There are some trees proposed which are in the region of 3.5m-4m in height, but these are “Austrian Pines”. They are not 6m high as most of the trees on the landscape drawing and architectural drawings are shown. In this connection, the trees and hedges along North Road West are also shown much higher than the 2m height that they are to be flailed to. All other trees specified by “girth”, i.e., their circumference. Typically, girth of 14cm to 20cm is specified with some having a girth of 25cm to 30cm. For clarity, the diameter/width of a tree with a girth of 14cm would be 6.7cm (or 2.5”). A tree with a girth of 25cm would have a diameter/width of 9cm (or 3.5”). These are not the big, profuse healthy specimens that the applicant represents throughout all of the drawings that he has submitted. Similarly, hedging is generally in the range of 10cm (4”) to 60cm (2ft), occasionally 90cm (3ft) high. Comment from the applicant/Tree Officer/Landscape consultee as follows, would be welcome. Unambiguous drawings should be submitted to show the “as-planted” heights of the trees and shrubs, so that they truly represent the schedule given in the landscaping report and Davis Landscape’s drawings. Applicant/Tree Officer/landscape consultant should be asked to confirm how long it will take for these trees and shrubs to develop to the heights and densities currently shown on the applicant’s drawings.

52. Planning conditions are routinely attached to maintain planting to the first five years of the project. With respect to the BMW application, such a condition is in force and variation application to remove listed trees were specifically made conditional upon replacement planting and maintenance of same. Many residents have commented that many of the trees and shrubs planted by BMW have died and have not been maintained. CBC have not enforced the condition. The planting is a key feature of this application and the applicant highlights it. If conditions are attached, it will not be acceptable to residents if they are not enforced.

NPPF

53. NPPF states that only the minimum number of planning conditions should be imposed, and any conditions which are imposed, must be enforceable. Local failure to enforce conditions on a number of permissioned sites, including BMW, has been the cause of much local anger, and has accounted for many hours of discussion between TRRA, the ward councillors, residents and officers. The drawings submitted must be transparent in representing what will be planted, how it is expected to grow, when it is expected to mature and relevant stages of street scene should be insisted upon so that the condition can be properly enforced. The applicant also invites conditions on some difficult areas of land drainage in phase 3. This is not considered acceptable in terms of the NPPF requirements.

Traffic

54. As discussed, traffic around the Park and Ride roundabout, backs up along the South West Distributor road (Grovefield Way), past BMW and often up to The Reddings roundabout, along Hatherley Lane, past the Asda roundabout and from the Park and Ride to the A40 daily, Monday to Friday for lengthy periods. Mornings are bad, but the afternoon rush hour period is worse. A resident has submitted a portfolio of photographs which also demonstrate a number of concerns for road traffic safety.

55. It is accepted that traffic into the area will increase with the extant outline permission for the B1 development. It is also accepted that comparison can be made between the outline permission granted and the hybrid permission that is being requested. The traffic analysis report does its best to show that the residual impact will be minimal, and Gloucester Highways appear to have been convinced. However, the reports significantly suppress the different traffic flows that will be generated by the nursery and Aldi supermarket, particularly in relation to evening and weekend traffic, but also through the day. The nursery traffic will comprise a heavy concentration during peak periods in the mornings, either as bespoke trips or linked trips to the new B1 offices, Aldi, other local or remote employers, or to drop other children at school. The afternoon traffic flows will be more spread, ranging from lunchtime collections, collections coinciding with end-of-school or coinciding with business hours. The afternoon traffic will peak in a similar way to that of Aldi and will considerably exacerbate the current afternoon problems. In terms of Grovefield Way, the applicant's analysis shows that beyond the initial B1 traffic flows into the site during rush hour, traffic is relatively modest until the late afternoon. A maximum, only 134 vehicle movements per hour are predicted with an average of around 78 vehicle movements per hour. In contrast, with quoted average shopping cycles of 30-40 minutes duration, the Aldi car park will be generating up to 188 vehicle movements per hour (average circa 130 per hour), turning left and right into the site and left and right out of the site, on a 40mph road Monday to Friday, at weekends, this rises to a maximum prediction of 272 arrivals and departures per hour (with an average of 168 per hour). This will have a significantly adverse effect upon the flow of traffic on Grovefield Way/South West Distributor road which it does not currently experience and which is unlikely to be experienced with the extant B1 permission. This requires comment from the applicant and GCC Highways.

56. We have researched planning applications made by Aldi across a number of Local Authority planning areas. There are applications to build new stores, but many more applications are subsequently made to provide increased car parking, to extend store hours and to extend delivery hours. In some instances, applications for 24 hours opening have been made. This is very troubling given that this application has reduced the car parking for Aldi "significantly".

57. The Aldi and Happy Days Nursery car parks are combined. There is no obvious segregation of dedicated spaces for either. This appears to be poor design. Children's safety will be significantly protected and enhanced if parents are able to park in front of a nursery and then escort their children inside. Without dedicated parking, parents may have to park on the far side of the car park and escort their children across it. This is contrary to the intentions of the NPPF in general, and paragraph 110 specifically.

58. Aldi developments seem to generally start with 1 parking space per 11.5m² of retail space. In this proposal 25 unprotected parking spaces are provided adjacent to Happy Days Nursery (HDN). There are a further 77 spaces available in the rest of the car park, making a total of 102 for both businesses. Parking must accommodate staff, visitors, electric charge points, parent and child and disabled spaces. Delivery vehicles will also be using the same car park for deliveries and there will be refuse collections. If all 102 spaces are used by Aldi (leaving none for HDN) this equates to 1 parking space per 17.1m² of retail. The normal Aldi formula would require 109 spaces for them alone for the 1254m² of retail space that is proposed. Whilst residents are pleased to see the improved landscaping along Grovefield Way, the car parking reduction which results appears woefully inadequate. This is because Aldi is being “shoehorned” into a front-of-site location when it could sit much more comfortably in the phase 3 area where more usual sized car parking could be provided. If Aldi have used all of the parking spaces (as seems to be foreseeable given the frequent variation applications for more parking once stores have been opened), there will be significant problems when parents call to collect their children at HDN, at times which the analysis shows will peak with Aldi’s demand. At weekends with maximum arrival rate of up to 140 vehicles per hour during a 5 hour peak period (when an average of 128 vehicles per hour, plus delivery vehicles) the car parking capacity provided is woefully inadequate. Simply, the proposed store is too large for this site.
59. If HDN parking is segregated/ designed to comply with common sense, NPPF paragraph 110 and basic health and safety requirements, then the shortfall in Aldi parking becomes very acute. Extension of parking is not possible in the constricted portion of the site due to changes in site levels and parking allocations for the adjoining office 1 and 2 buildings. As such, either the landscaping would need to be sacrificed, or residents and B1 users would be subjected to an almost constant traffic nightmare.
60. Any observer of an Aldi store and car park will be able to verify the very congested and difficult traffic movements that occur during peak times due to a shortage of parking spaces. Queues of stationary traffic waiting to turn into the store or manoeuvre out of the car park are long-lasting and commonplace. The location of the Aldi store at the front of the site provides very little “buffer” room for “stacked parking” during peak periods. Stacking of vehicles on Grovefield Way is likely, increasing congestion, pollution and travel times, all contrary to the purpose of the South West Distributor road. Comment and analysis is required please.
61. It has already been rehearsed in the foregoing that the scale of the supermarket is inappropriate to the site and that destination and top-up supermarkets are already very close and very accessible to this site. Fast food outlets (KFC and burger van), Asda café and a Harvester are also available within 5 minutes’ walk of the site. Sandwiches and snacks can be purchased at Home Bargains or Asda. The likely requirements for occupiers of the extant permissioned B1 business park are more than adequately catered for and enhance the attraction of the site. If an on-site shop is required, a small boutique shop/café, keeping the same hours as the offices, incorporated into one of the B1 buildings would be far more appropriate. The proposed Aldi is simply too large for this location on the site, and the site is therefore being over-developed.
62. If the D class nursery is thought to be appropriate, it could possibly be located to be as far as possible from the Arle Court Roundabout, B&Q, the Aldi car park, all of the other car parks, Grovefield Way and the M5. The hedges could be incorporated into the design to provide a more appropriate green open space to service the nursery.
63. Lighting specifications, intensities, times of operation etc, for car parks and headlight beam tracks relative to existing residential properties in North Road West and along Grovefield Way are required.
64. Pollution analysis/monitoring above that which is required to predict stationary traffic created by BMW’s failure to implement its travel plan is necessary to predict likely increases in pollution resulting from this proposal to ensure that thresholds are not breached.
65. Analysis of additional background noise from existing and new stationary traffic is required for a new acoustic report.
66. Parking for Aldi and Happy Days should be redesigned to segregate bespoke safe parking for parents and children to use, so that they can directly access the nursery, without crossing the car park.
67. Transport assessment refers to safe manoeuvres for delivery vehicles as they will be escorted onto and off site to be provisioned by a banksman/marshal. This raises a number of questions. If the marshal has to be called, the large delivery lorries will need to park safely somewhere before contacting the marshal, then meeting him/her and being escorted onto the site (past the nursery). Further detail is required to assess viability. No such provision is provided on the present layouts, and the suggestion is thought untenable and unsafe.
68. Viable and enforceable travel plans are required for the supermarket, nursery and B1 offices and they must be enforced.

69. NPPF is very clear on the requirement for sustain^{Page 308}Paragraph 102d provides a requirement for a full environmental impact study of traffic to avoid and mitigate adverse effects and achieve net environmental gains. Paragraph 110a requires priority to be given to cyclists and pedestrians in car parks and shared spaces. Paragraph 110d requires design for efficient delivery of goods, collection of refuse, etc. These conditions have not been met by the submitted designs and supporting documents. Clarity is required and the proposals must be enforced.
70. The NPPF requires design to encourage modal shift. The Aldi supermarket will derive the vast majority of its business by taking existing custom from the existing stores that are all within a few minutes' walk or drive from the site. At best, modal shift is neutral. Additional car journeys will be encouraged with the business transferred from Aldi's existing Tewkesbury Road store with the balance (approximately 20%) attracting new trips into the area. As the applicant's assessment shows, and as we discuss, there will be many, many special trips throughout the day to visit Aldi, in contrast to the trips that would be derived from a B1 only development. The effects of this require careful and thorough modelling please.
71. The committee will be aware that Gloucestershire County Council is now set to take control of the new £22 million scheme to deliver the infrastructure for the 45 acre Cyber business park on the west side of Cheltenham (the opposite side of the A40 from this site) because they are both the transport and highway authority. They will also progress the bid to Homes England to fund £249m upgrade scheme for Junction 10 of the M5. This will create a new link road between M5 junction 10 and west Cheltenham, expand Arle Court Park and Ride and include a "smart motorway upgrade" on the M5 between Junctions 9 and 11A. Residents are mindful that these are very large infrastructure projects which have the potential to make a huge contribution to the economic prosperity of the county for decades and the development on this site should not prejudice it. The traffic implications for the South West Distributor road (Grovefield Way) and this site requires and deserves much better traffic analysis by both the applicant and particularly from Gloucestershire Highways to model actual traffic flows at present and the predicted traffic flows arising from the extant B1 outline scheme in the context of the Cyber Park. This hybrid proposal is radically different from the extant B1 proposal and as yet is undefined with regard to the future of phase 3 where only outline permission is sought. The site is immediately adjacent to the Park and Ride. The parking and congestion problems that have arisen since BMW opened and the parking issues that have been created for the existing Park and Ride (associated with BMW/GCHQ staff using it as a "Park and Walk"), as well as the significant impact on residential street parking has already resulted in a number of minor accidents and near-misses. If further ad-hoc development is granted permission, it may well prejudice the progress of the Cyber Park, particularly in relation to the Park and Ride. We are mindful that if the option for a Park and Ride extension onto this site had been taken, millions of pounds to create a multi-storey car park at Arle Court to service the Cyber Park would have been saved. Some "joined-up thinking" is required as a matter of urgency. As a minimum, a properly-conducted traffic survey along Grovefield Way must be undertaken during a neutral month.
72. With the exception of pollution increase and frustrating congestion and journey times, the most significant impact on residents will be the introduction of retail weekend and evening traffic. Currently, the extant B1 proposal would result in only negligible traffic movements during the evenings and weekends, leaving residents free to enjoy their gardens, walks and open their windows without traffic noise, background noise and pollution associated with a supermarket. Similarly, the applicants own analysis proves that traffic entering and leaving a business park will be substantially less than the extensive traffic which will be visiting Aldi every hour, but very particularly during evening and weekend periods. This weekend/evening traffic will significantly destroy the residents' ability to enjoy their gardens, open their windows and engage in walks or cycle along the National Cycleway (which runs along Grovefield Way and North Road West) with their children, without encountering significant traffic hazards, pollution, the noise associated with the Aldi supermarket. The Aldi supermarket is considerably too large and is inappropriate for this site for all of the reasons rehearsed by us and individual residents.

Drainage

73. There are well-documented problems with water flowing off the hybrid site onto North Road West in a number of areas. This has caused extensive damage to the newly-laid road surface (which is also a national cycleway). This has cost much of our time, council time, residents' time and public money trying to resolve. It is still not resolved. We understand that the county council believe that BMW's operations have disrupted an existing pipe. BMW have been un-cooperative in abating the nuisance.
74. During heavy rain, manhole covers in North Road West regularly lift discharging foul water. It is a fact that this happens. It is lamentable that proper records of it do not seem to be kept by the utility.

75. As was discussed in great detail at the planning committee meeting in December 2017, that prior to the building of BMW, local flooding of residents' houses and gardens did not occur. Since BMW's construction, flooding occurs regularly. This is well-documented by the ward councillors. Again, the fact that the utilities keep inadequate records is lamentable.
76. Within our detailed booklet report we include a copy of a letter from Andrew Hulcoop, Managing Director of BMW, which refers to the flooding that occurred on the BMW site shortly before it opened. This occurred because there was insufficient stormwater storage on site as the "experts" had got it wrong. Run-off from Grovefield Way also entered the site due to poor interception drainage design. BMW subsequently applied for and constructed a second attenuation pond to alleviate the problem on their site.
77. The applicant's expert acknowledges that surface water drainage for phase 3 would be difficult. The local flood authority (LLFA) also raises concerns. It is not equitable to simply "condition" this. Full design treatment must be undertaken to establish whether phase 3 and the B1 jobs that the applicant claims is viable before outline permission is granted.
78. The LLFA raise doubts regarding the discharge to the surface water ditches which in peak times will need to receive flows from the site which are close to the discharge from 2 x fire engine hoses running at full pressure. Extensive analysis of discharge into the same drainage ditch has been required for the nearby B1 office development adjacent to Asda and behind Nuffield by LLFA, together with analysis of surface water flows. The LLFA requirements for this site should be no less rigorous, particularly as development of the site has already caused an increase in local flooding and because preliminary analysis suggests that phase 3 in particular may be problematic.
79. The public sewer on North Road West into which discharges from these new buildings will flow is already close to capacity (taking account of the storm surges which lift the manholes). Analysis of the residual capacity of the foul sewer to accept the new flow from this development should be undertaken to avoid the need for the sewer to be upgraded by the utility, with those costs being passed onto residential bill-payers. The developer will derive pecuniary benefit from the construction of the estate, and should not be relying upon public funding or the utility to sponsor his development.
80. Again, reports prepared by the applicant's experts for the BMW project have proven to be incorrect. Remedial work has been required, has been carried out and some is still required. The same experts are again making predictions that are contrary to local knowledge and experience. This is not acceptable.

Developer contributions to the community

81. We are surprised that no CIL or other contribution is being required to help offset the damage that this development and loss of the greenbelt will cause to the local community.

Community consultation

82. It will be seen from the TRRA and the 500 or so residents' own comments and submissions in respect of the previous application and this application, as well as from the foregoing comments, that this hybrid proposal and the absence of detail/site history, is of considerable concern to residents. There has been much reporting of this in the press in relation to the development, parking issues, traffic speeds, congestion, problems with the Park and Ride, etc.
83. There have been 5 iterations of the project from the applicant since it was first submitted in December 2016. With each iteration, the scheme has been improved in some way that is agreed. On this iteration, the removal of the Costa drive-through is welcomed. In granting a further consultation period, the planning officer acknowledged that this was because of the high local interest.
84. It is clear from the comments submitted across the 5 iterations that broadly similar questions and points of clarification are being raised each time.
85. NPPF paragraph 40 requires that parties other than the applicant and the planners should participate in the pre-application stage consultations, particularly the local community.
86. Paragraph 128 NPPF requires applicants to work closely with the local community, and take account of their views.
87. NPPF paragraph 129 requires local authorities to engage with the local community.
88. The applicant and local authority have clearly engaged in much negotiation and the various reports and documents submitted by the applicant confirm this.

89. However, until 21 September 2018 neither the applicant nor the applicant had approached TRRA for any form of consultation. Following the approach to TRRA from Ridge/Hunter Page, the committee immediately offered to meet with Paul Fong at their offices. On the assumption that a meeting would lead to some agreement, TRRA offered to arrange a public meeting for residents, the applicant and the planning officers to attend. Ridge/Hunter Page advised that they would meet us on 10 October 2018. Shortly thereafter, the planning officer confirmed that the application was to be presented to the planning committee on 18 October 2018 and that the consultation would close on 9 October 2018 (the day before the meeting with Ridge/Hunter Page). Although we were informed that comments could still be submitted up to the date of the planning committee hearing, they would not be incorporated into the officer's report. TRRA made a detailed request for deferment of the planning committee meeting/an extension to the consultation period but this has been denied by the officer. We have expressed extreme regret to CBC. Following correspondence between us and Ridge/Hunter Page, Paul Fong also approached the officer with a similar request for an extension. On 3 October 2018 we received confirmation from Ridge/Hunter Page that TRRA can submit comments within the consultation until 16 October 2018. However, if the matter is to be placed before committee on 18 October 2018, the officer will be unable to account for our questions and points in his report and will be unable to refer them to other consultees. It is regrettable that after 20 months, the planning officer should deny due process in the consultation, as set out in the NPPF and also in the Localism Act 2011 Part 6 requiring interested parties to co-operate in the preparation of development plans. The preparation of this submission will have taken in excess of 100 hours, as did our previous submissions. This could be avoided with proper consultations.
90. At the date of preparing this document, comments from other consultees have not been submitted. Notably, the Architect's Panel, Landscape Architect, Environmental Health and Tree Officer. The Strategic Land Use Team references to the NPPF are out-of-date and redraft is required. The GCC Highways comments need to be reviewed in relation to actual road conditions and in particular the Cyber Park and extension to the Park and Ride. Some critical analysis of the applicant's submission is necessary. The absence of an application form is a significant omission that means that the full impact of the proposal in terms of opening times is not obvious. The land drainage teams seem not to know of recent relevant foul water and surface water flooding events in the area. Since the Elmbridge Court "hamburger" roundabout improvements, Junction 11 entrance/exit roundabout is regularly blocked during rush hour yet Highways Agency make no comment. There are comments that we have raised in respect of the landscaping scheme which need to be referred to the Tree Officer, whilst input from Building Control would also have identified the need for mechanical plant (heating and cooling) for the offices which is not located and which will have significant environmental impact on residents. Many of these concerns also need to be referred to the Environmental Health office. This submission is simply not ready for a decision, or in the alternative, must be refused.

Summary

91. There are fundamentally important pieces of the applicant's evidence which are missing, incomplete, out-of-date, or provide only a selective view. The problems with the existing BMW development on the site and the severe adverse impact upon residents and the Park and Ride are well known and have been well publicised in the media and discussed by councillors. Public funds now need to be spent trying to resolve the problems of the full Park and Ride car park. The empty buses at the Park and Ride testify that it now fails in its primary purpose. The inclusion of retail in this scheme is not trivial as the applicant suggests, and will have profound repercussions locally on residents' wellbeing, on local businesses, and will adversely affect the road network and interactions with the A40 Arle Court roundabout as well as the South West Distributor road. This proposal and the detailed examination of the fall-back extant outline permission requires careful consideration in tandem with the proposed Park and Ride extension to support the Cyber Park.
92. All of these points have been raised by residents and TRRA many times in our previous comments and reports; most are still not addressed in this application. Many of points and concerns detailed above, were raised by the planning committee members in the debate on the last hybrid application in December 2017, and are not addressed in this application. Community involvement and consultation is required pursuant to the NPPF and the Localism Act. Proper community consultation may well have resulted in agreement on a scheme that would satisfy local concerns and the designers and officers would benefit from local knowledge. That opportunity seems to have been lost by this rush to planning committee and by excluding residents and TRRA from effective pre-application discussions and consultations on this scheme.

Given all of the circumstances, and the foregoing concerns and comments, we have no alternative but to maintain residents' objection despite there being elements of this scheme that are preferable to the previous submission which is now the subject of an appeal.

For The Reddings Residents' Association

Gary Fulford

Gary Fulford BEng(Hons) CEng MIStructE ICIOB Registered Construction Adjudicator Registered Expert Witness
Chairperson

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APPLICATION NO: 18/01004/FUL	OFFICER: Mr Joe Seymour
DATE REGISTERED: 23rd May 2018	DATE OF EXPIRY : 22nd August 2018
WARD: Benhall/The Reddings	PARISH:
APPLICANT:	Hinton Properties (Grovefield Way) Ltd
LOCATION:	Land At North Road West And Grovefield Way, Cheltenham
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).

ADDITIONAL REPRESENTATIONS

Wolvercote,
Old Reddings Road,
Cheltenham,
Gloucestershire
GL51 6SA

Comment: 10th October 2018

The changes to the planning application notwithstanding, my previous objections still stand.

15 Appleton Avenue,
Cheltenham,
Gloucestershire
GL51 6TS

Comment: 10th October 2018

And here we are once more... just when we thought this had been opposed and refused once. We again oppose the proposed development, for exactly the same reasons as before. The Reddings Resident's Association have done a sterling job of investigating and presenting the facts in their report, we concur with their findings.

Please, CBC, do the right thing and refuse this application again.

At the time of writing there are 171 objections to this application, and 339 to the previous application. The numbers speak for themselves - nobody (other than the developers, it seems) wants this development to be built!

Balquhidder
The Reddings
Cheltenham
GL51 6RY

Comment: 11th October
Letter attached.

March Winds,
North Road East,
Cheltenham
GL51 6RE

Comment: 11th October 2018

I strongly object once again (for the third time) to the proposed development on the land at North Road West, Grovefield Way. I agree with the points raised in the document written by the Reddings Residents' Association. I am particularly worried about the increase in air, light and noise pollution, the major increase in traffic that this will bring about and the destruction of the wildlife habitat.

Fayrecroft,
North Road East,
The Reddings
Cheltenham,
Gloucestershire
GL51 6RE

Comment: 11th October 2018

have been reading the officer report recommending to permit the hybrid development of Grovefield Park and have a few comments.

a) Why is only half of the very comprehensive and well researched document by The Reddings Resident's Association shown on the report? The document has 92 points and yet only up to 45 are shown. Indeed point 45 stops mid sentence. At best this shows that the officer report was not checked sufficiently. I can only assume, that alongside previous official errors on Grovefield Way issues, such as misquoting the actual speed limits and giving motoring advice contrary to the Highway Code, it is just carelessness.

At worst it is a way of withholding information. I am sure this is not the case.

Whatever the reason, not to publish the whole document is an insult to the document writers who spent over 100 hours of unpaid voluntary work to produce it.

b) The report acknowledges the high traffic volumes experienced on Grovefield Way:

6.7.4 "Officers do not dispute the high traffic volumes that are experienced in the vicinity of the site in and around Grovefield Way and the Arle Court roundabout. The development would increase vehicle journeys to and from the area which would likely see a rise in NO2 levels. However, there is no evidence available to indicate that the proposed development would raise NO2 levels to unsafe levels above an annual average of 40 g/m³ on a regular basis, as experienced in the town centre locations where the urban density is higher than the application site"

This section admits there is "no evidence available". I admit that on occasion the English Language can be ambiguous, but does on face value does this mean:

a) Effective testing and analysis was carried out on this specific site and the results indicated that pollution levels were within acceptable limits.

Or

b) There was no evidence because no testing was carried out on this specific site.

Of course it is option b).

The previous paragraph says the most recent test was in 2016 in Princess Elizabeth Way and in 2013 in Telstar Way. (The only other testing I was aware of was the pollution monitor placed on Reddings Road near Badgeworth Road, but this was purely for calibration purposes). Since this testing was carried out BMW has opened.

It does not and cannot take into account any possible increases from the hybrid park and nearby nursing home being completed, nor any increased traffic flows from the Cyber Park, West of Cheltenham development or new Leckhampton School.

The argument about "urban density" is also questionable. Grovefield Way is a distributor road and motorists use it as a way of accessing the A40 and M5. One of the reasons for blocking Boots Corner was to discourage through traffic away from the town centre to alleviate pollution levels in this specific area. This has proved to be very controversial and yet it is a credit to the Council to show its great commitment to looking at the pollution problem, despite almost universal condemnation. Only time will tell if this is a successful strategy or not, but it is only by implementing a rigorous testing period will solid effective results become available.

It would be inconsistent for the Council to allow the hybrid park to be completed without a rigorous and independent pollution monitoring programme being carried out on site first. It is only now that traffic pollution is being recognised as a serious threat to health, as seen by reports published in the British Medical Journal and, very tragically, the death of a 9 year old girl in London.

Only history will say how injurious traffic pollution was to health. But as an example would you leave your pre school child or grandchild to play on the hard shoulder or embankment of a motorway or dual carriageway for up to 12 hours a day? Of course you would not, that would be ridiculous. But 40 years ago you were quite happy to have children playing with asbestos mats in chemistry lessons. Would you allow it now? Of course not; that would be appalling.

So I would urge anyone taking part in the decision making process to ask them one simple question:

" If an effective pollution study has not been carried out on site, would I be happy to send my child or grandchild to a nursery on this site?"

If there is any, any doubt at all, the sensible decision is to either to refuse the application or defer any decision until clearer data is available.

Your conscience will guide you.

Comment: 12th October

I found these very interesting points within Annexe 1- Outdoor Air Pollution within the Annual Report of the Chief Medical Officer (for the UK) 2018 :

"Air pollution influences the developing foetus, increasing the risk of premature birth, decreasing birth weight, promoting intrauterine growth retardation, reducing lung function at birth. Since infant's and children's lungs are still growing and maturing, any deficit in growth will have an impact for the whole of the child's life. Many cross sectional studies have reported lower lung volumes in children living in more polluted areas and longitudinal studies e.g. the University of Southern California (USC) Children's Health Study show this extends

to adult life. Living close to a busy road increases the risk of developing asthma in childhood, even when confounding factors are taken into account. The contrasting lack of association between asthma onset and urban background pollution, and the strong associations between proximity to traffic arteries and asthma suggests that those pollutants occurring at very high concentrations along street corridors play a role in the genesis of asthma. Many studies have reported associations between lung function and pollution and a few also suggest that air pollution may also contribute to the development of COPD".

Set against this background how can a new pre school nursery can be built before an on site pollution study is carried out? It was reported in April 2017, following a report from Greenpeace, that more than existing 1,000 nurseries were sited close to roads where the nitrous dioxide levels exceeded legal limits. These nurseries cannot be moved, but any new site must be examined carefully first before permission is granted.

This subject is too important to be swayed by any initial profit or revenue attractions. Already it is believed traffic pollution contributes to 40,000 deaths a year in the UK.

Our future generations must be protected.

I feel Cheltenham Borough Council have an opportunity not only to protect vulnerable children now, but create a very important national precedent for all councils nationally by instigating a scientifically valid study first.

APPLICATION NO: 18/01004/FUL		OFFICER: Mr Joe Seymour
DATE REGISTERED: 23rd May 2018		DATE OF EXPIRY: 22nd August 2018 (extension of time agreed until 31st October 2018)
WARD: Benhall/The Reddings		PARISH: N/A
APPLICANT:	Hinton Properties (Grovefield Way) Ltd	
AGENT:	Hunter Page Planning	
LOCATION:	Land At North Road West And Grovefield Way Cheltenham	
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).	

Update to Officer Report

1. SUGGESTED CONDITIONS

- 1 The planning permission hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The outline planning permission hereby granted shall be begun not later than the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason: To accord with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 3 Application(s) for approval of the reserved matters must be made not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 4 The planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 5 The non-B1 uses hereby permitted shall not operate outside of the following hours:

- A1 retail store - Monday to Saturday - 08:00 - 22:00 / Sundays and Bank Holidays - 10:00 - 18:00
- D1 Nursery - Monday - Friday - 07:00 - 19:00

Reason: To avoid undue disturbance to neighbouring properties, in accordance with policy CP4 of the Local Plan.

- 6 No more than 20% of the total net sales area of 1,742 sqm shall be used for the sale of comparison goods within the discount food store hereby permitted.

Reason: To control the mix of convenience and comparison goods sold within the retail space thereby managing the impact on the town centre in accordance with the advice set out within the NPPF.

- 7 The food store hereby permitted shall only be used by a discount food supermarket operator and for no other purpose (including any other purpose in Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Order 2005, (or in any provisions equivalent to that class in any statutory instrument revoking or re-enacting that Order with or without modification). The following service shall not be operated from the discount food supermarket:

- i. Banking Facilities (excluding ATM),
- ii. Dispensing Pharmacy,
- iii. Dry cleaning or Post Office Service,
- iv. Photographic shop or booth,
- v. Café / restaurant,
- vi. Sales of cigarettes or tobacco.

Reason: To ensure that safe and suitable access to the site can be achieved for all people and that a safe and secure layout which minimises conflict between traffic and cyclists or pedestrians can be provided in accordance with Section 4 of the NPPF.

- 8 Prior to the installation of any lighting scheme, full details shall be submitted to and approved in writing by the Local Planning Authority to provide that

- Light into neighbouring residential windows generated from the floodlights shall not exceed 5 Ev (lux) (vertical illuminance in lux).
- Each lighting unit must be aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical.
- The lighting shall be designed and operated to have full horizontal cut-off and such that the Upward Waste Light Ratio does not exceed 2.5%.

The submitted scheme shall include an isolux diagram showing the predicted illuminance in the vertical plane (in lux) at critical locations on the boundary of the site and at adjacent properties.

The approved scheme shall be implemented prior to first use of the lighting and be permanently maintained in that state thereafter.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected in accordance with policy CP4 of the Local Plan.

- 9 No development shall take place, including any works of demolition, until a construction method statement has been submitted to, and approved in writing by, the local planning authority. The approved statement shall be adhered to throughout the construction period. The Statement shall:

- i. specify the type and number of vehicles;
- ii. Provide for the parking of vehicles of site operatives and visitors;
- iii. Provide for the loading and unloading of plant and materials;
- iv. Provide for the storage of plant and material used in constructing the development;

- v. provide for wheel washing facilities to control the emission of dirt or dust;
- vi. Provide the intended hours of operations;
- vii. Provide a plan of the site compound.

Reason: To reduce the potential impact on the public highway and accommodate the efficient delivery of goods and supplies in accordance with paragraph 110 of the NPPF.

- 10 Prior to beneficial occupation of the proposed development, the car parking, turning, loading and unloading facilities shall be provided in accordance with the approved plan and shall be maintained available for that purpose thereafter.

Reason: To reduce potential highway impact by ensuring that vehicles do not have to park on the highway resulting in a severe impact contrary to paragraph 110 of the NPPF.

- 11 Upon beneficial occupation of the development, the submitted supermarket Delivery Management Plan shall be adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises conflict between traffic, cyclists and pedestrians in accordance with paragraph 110 of the NPPF.

- 12 Upon beneficial occupation of the development, the submitted Happy Days Nursery Delivery Management Plan shall be adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

Reason: To minimise hazards and inconvenience for users of the development by ensuring a safe and secure layout that minimises conflict between traffic, cyclists and pedestrians in accordance with paragraph 110 of the NPPF.

- 13 Prior to beneficial occupation of the proposed development, the cycle parking/storage facilities shall be provided in accordance with the approved plan and shall be maintained available for that purpose thereafter.

Reason: To reduce potential highway impact by ensuring that vehicles do not have to park on the highway resulting in a severe impact contrary to paragraph 108 of the NPPF.

- 14 Details of a car parking management scheme to limit office employment parking occurring within the retail element of the development during Office opening hours shall be submitted to and approved in writing by the Local Planning Authority. The approved plans shall then be implemented on first occupation of any B1 Office block and adhered to in all respects unless amendments to the plan have first been agreed in writing by the Local Planning Authority.

Reason: To ensure that adequate parking provision is provided in order to minimise any potential highway safety implications of displaced parking and to minimise conflict between traffic, cyclists or pedestrians in accordance with paragraph 110 of the NPPF.

- 15 The approved Travel Plan and any associated site/use specific Travel Plans shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the opportunities for sustainable transport modes are taken up in accordance with paragraph 110 of the NPPF.

- 16 Prior to works commencing on the development hereby permitted, details of pedestrian dropped kerb tactile crossing points across Grovefield Way in the proximity of the bus stops south of the development site shall be submitted to and agreed in writing by the Local Planning Authority, the works shall then be constructed in accordance with the approved plan and made available for public use prior to first occupation of the buildings hereby permitted.

Reason: To ensure that the priority is given to pedestrian and cycle movements and that a safe and secure layout that minimises conflict can be created in accordance with paragraph 110 of the NPPF.

- 17 No building on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public highway to that building(s) have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with paragraph 110 of the NPPF.

- 18 Details of the layout and access, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out in accordance with the approved plans. No building on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public Highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with paragraph 110 of the NPPF.

- 19 No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

Reason: To ensure that safe, suitable and secure access is achieved and maintained for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with the National Planning Policy Framework and to establish and maintain a strong sense of place to create attractive and comfortable places to live, work and visit as required by section 12 of the NPPF.

- 20 The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 43m distant in both directions (the Y points). The area between those splays and the

carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.6m and 2.0m at the Y point above the adjacent carriageway level.

Reason: To reduce potential highway impact by ensuring that adequate visibility is provided and maintained and to ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with Section 9 of the NPPF.

- 21 The details to be submitted for the approval of reserved matters shall include vehicular parking and turning and loading/unloading facilities within the site, and the building(s) hereby permitted shall not be occupied until those facilities have been provided in accordance with the approved plans and shall be maintained available for those purposes for the duration of the development.

Reason: To ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with Section 9 of the NPPF.

- 22 The development hereby permitted shall not be occupied until details of secure and covered cycle storage facilities have been made available in accordance with details to be submitted to and approved in writing by the local planning authority.

Reason: To ensure that adequate cycle parking is provided, to promote cycle use and to ensure that the opportunities for sustainable transport modes have been taken up in accordance with section 9 of the National Planning Policy Framework.

- 23 No development shall commence on site until a scheme has been submitted to, and agreed in writing by the council, for the provision of fire hydrants (served by mains water) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the council.

Reason: To ensure adequate water infrastructure is made on site for the local fire service to tackle any property fire in accordance with section 9 of the National Planning Policy Framework.

- 24 No works shall commence on the development hereby permitted until a Travel Plan has been submitted to and agreed in writing by the Local Planning Authority, setting out;

- i. objectives and targets for promoting sustainable travel,
- ii. appointment and funding of a travel plan coordinator,
- iii. details of an annual monitoring and review process,
- iv. means of funding of the travel plan, and;
- v. an implementation timetable including the responsible body for each action.

The approved Travel Plan and any associated site/use specific Travel Plans shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the opportunities for sustainable transport modes are taken up in accordance with paragraphs 32 and 36 of the NPPF.

- 25 The development shall be carried out in strict accordance with the recommendations and requirements of the ecological survey report dated March 2018 (ref: 4087.EcoAss.vf2) submitted with the planning application.

Reason: To safeguard ecological species, having regard to Policies NE1 and NE3 of the Cheltenham Borough Local Plan (2006).

- 26 Prior to its installation, full details of all fixed plant on the site and details of its noise emissions shall be submitted to and approved in writing.

Reason: To safeguard the amenity of adjoining properties and the general locality, having regard to Policy CP4 of the Cheltenham Borough Local Plan (2006).

- 27 Prior to the commencement of development, other than that necessary to comply with the requirements of this condition, the approved remediation scheme necessary to bring the site to a condition suitable for the intended use shall be implemented in full. In addition this shall provide for the following:

- i. Provide gas protection to CS2 of CIRIA C665. The type of building proposed is commercial and for this Table 8.6 of CIRIA 665 indicates that the following special protection measures are required in the new buildings.
 - Reinforced cast in-situ floor slab with at least 1200 gauge DPM
 - Beam block or precast concrete slab and at least 2000 gauge DPM/reinforced gas membrane
 - Underfloor venting
 - All joints and penetrations sealed

Underfloor venting is not required in large spaces such as warehouse but it is required where smaller rooms such as offices are present.

- ii. TP12 at 0.15 m showed elevated lead in the made ground. Therefore the made ground (0.3m thick) should be replaced in the vicinity of TP12 if soft landscaping is proposed in this area. Following the completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Local Plan Policy NE4 relating to development on contaminated land.

- 28 All trees and hedging within the site shall be retained unless shown on the approved drawings as being removed. Any trees or planting indicated on the approved drawings which, within a period of five years from the date of planting, die, are removed or become seriously damaged, diseased or dying shall be replaced during the next planting season (October to March inclusive) with other trees or plants of a location, species and size to be first approved in writing by the Local Planning Authority. Any pruning works within the five year period shall be carried out in accordance with BS 3998:2010 (or any standard that reproduces or replaces this standard).

Reason: In the interests of visual amenity, having regard to saved policies GE5 and GE6 of the Cheltenham Borough Local Plan (2006).

- 29 Following the removal of the trees as permitted by this decision, each tree shall be replaced by one of the same species in the same vicinity unless first agreed otherwise by the Local Planning Authority. The replacement trees shall be planted during the planting season current at the time of felling (end October - end March) or during the next immediately available planting season. The size of the trees shall be at least a

Selected Standard as per BS 3936-1:1992 (or any standard that reproduces or replaces this standard). The trees shall be maintained for 5 years after planting and should they be removed, die, be severely damaged or become seriously diseased within this period they shall be replaced with another tree as originally required to be planted by this condition.

Reason: In the interests of visual amenity, having regard to Policy GE5 of the Cheltenham Borough Local Plan (2006).

- 30 Prior to the implementation of any landscaping, full details of a hard and/or soft landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall identify all walls, fences, trees, hedgerows and other planting which are to be retained, and provide details of all new walls, fences, or other boundary treatments; finished ground levels; new hard surfacing of open parts of the site which shall be permeable or drained to a permeable area; a planting specification to include [species, size, position and method of planting of all new trees and shrubs]; and a programme of implementation.

All hard and/or soft landscaping works shall be carried out in accordance with the approved details prior to first occupation of any part of the development unless otherwise agreed in writing by the Local Planning Authority.

Any trees or plants indicated on the approved scheme which, within a period of five years from the date of planting, die, are removed or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size which shall be first agreed in writing by the Local Planning Authority. All hard landscape works shall be permanently retained in accordance with the approved details [delete if not appropriate].

Reason: In the interests of the character and appearance of the area, having regard to saved policies CP7, GE5 and GE6 of the Cheltenham Borough Local Plan (2006), and adopted policies SD4 and INF3 of the Joint Core Strategy (2017). Approval is required upfront because the landscaping is an integral part of the development and its acceptability.

- 31 No development approved by the permission shall be commenced until a detailed drainage strategy based upon the approved drainage strategy submitted for Phase 2 and 3, Corinthian Park, Cheltenham, Reference 16-6953 has been submitted to and approved in writing by the Local Planning Authority. If an alternative strategy or amendments are required, it must be submitted to and approved by the LPA. The drainage scheme shall be carried out in accordance with the approved details.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage and water quality in the locality.

- 32 The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and the scheme shall be implemented in accordance with the approved details before the development is first brought into use.

Reason: This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.

- 33 Notwithstanding the provisions of The Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and/or re-enacting that order with or without modification) the five buildings proposed for office use as shown on drawings 178 - 96 F and DLA.1755.L.09 E shall only be used for office use as defined by Use Classes B1a and B1b of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Reason: To ensure the local planning authority has control over the type of employment uses at the site which has been allocated as an employment site in policy EM3 of the emerging Cheltenham Plan. The reason for this condition also has regard for saved Cheltenham Borough Local Plan policies EM1 and EM2, and policy SD1 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031.

APPLICATION NO: 18/01004/FUL	OFFICER: Mr Joe Seymour
DATE REGISTERED: 23rd May 2018	DATE OF EXPIRY : 22nd August 2018
WARD: Benhall/The Reddings	PARISH:
APPLICANT:	Hinton Properties (Grovefield Way) Ltd
LOCATION:	Land At North Road West And Grovefield Way, Cheltenham
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).

ADDITIONAL REPRESENTATION

25 Timperley Way
 Up Hatherley
 Cheltenham
 GL51 3RH

Comments: 15th October

Letter attached.

CBC should not settle for 5,900 m² of Office being a **Full** application (i.e. reasonably secure/certain) but a massive **8000 m²** of Office ('Offices 3 & 4') being **merely Outline**, (i.e. they could be re-applied for as yet more Retailing (once the Aldi precedent and its frontal-prominence were established/conceded).

Taking account of the existing (huge and overbearing) BMW **car retailing** development, this former Green Belt land would (by adding an Aldi superstore) become a prominent Retail-oriented site.

Swapping the Costa cafe for a minor 870 m² "Office 5" makes little difference to the intended Retail prominence (and potential dominance). The superstore could subsequently apply to enlarge (and include a cafe), easily displacing/deleting the small 'Office-5' plot.

For an Aldi in Gloucestershire this would be relatively large (1742 m²; Cheltenham's Tewkesbury Road Aldi is 1570 m²); it will therefore draw customer traffic from a wider area. However, the new Lidl rivals on Tewkesbury Road and at Bishops Cleeve are increasing in size to 2856 m² and 2753 m² respectively.

Refusal Reason-1

CBC's 'Strategic Land Use Team' states in its 'Summary Conclusions':

"There remains a shortfall in B-class employment land across the Borough".

Here is a most excellent site ready approved for B1 Offices, and accordingly it is valid to maintain **Refusal Reason-1** and seek to preserve that B-class provision, well served by access to the major highway network.

With a superstore added, the overall larger site (the land between the Golden Valley Bypass and North Road West) would be 'eroded' to have far more Retail (and nursery) than the planning officer's claimed "**12%**".

Overall the non-B1 uses would NOT "be subservient" to B1, nor could their necessary frontal (and aerial) signage be reticent.

The primary objection is to the inclusion of any high-movements Retail at this sensitive rural-edge site, entered directly off the single-carriageway South West 'Ring Road', where maintaining uncongested flow is vital.

Councillors were poorly advised not to include any objection to the superstore's non-compliance with CBC's extant Retail Policies, **RT-1** and **RT-7(b)**, (whose status is still subject to objection and debate in the Local Plan Examination). In addition there remain unresolved objections to the wording of Policy EM3 of the submitted Local Plan, pending its Examination.

Regardless, third-parties are capable of progressing these **Retail Policy considerations** at the January appeal, and can win an appeal on grounds where a council might be cautious or timid.

Since before the 2006 Plan revision, Cheltenham has maintained a carefully defined Hierarchy of retail centres: 'Town Centre', 'District Centre', and 'Neighbourhood Centre'.

Yet impact on Neighbourhood Centres is simply ignored in the applicant's poor Retail assessment.

Walking to the only bus route (the 94) is awful and polluted.

Nor are the Arle Court junctions safe for cycling.

This would therefore be a **drive**-to location for retailing, which therefore does not even qualify under the last **clause (e)** of **Policy RT-1** as being an out-of-centre site ***"accessible by a regular choice of means of transport"***.

Revision of Cheltenham's Retail Policies was deferred by the JCS Examination into the "immediate review" for Gloucester and Tewkesbury's housing shortfalls.

However, the JCS officers' draft of this Review has just been published, making it a more leisurely (almost 'long grass') "JCS-2" rather than "immediate".

Therefore the Cheltenham Local Plan will be asked to address this special town's Retail Policies and its local shopping-centre 'hierarchy' (which the other two Districts do not have).

In the Retail Review for Cheltenham, 'Arle Court' may finally become recognised as a 'District Centre', but that should NOT be extended/enlarged along traffic-sensitive Grovefield Way, beyond B&Q.

Refusal Reason-2

The linked roundabouts of Arle Court, (on the A40 and on the South West 'ring Road' of Grovefield Way-Up Hatherley Way, connecting to the A46) are **critical road infrastructure** for the (reasonably) uncongested functioning of Cheltenham (and of the West Cheltenham urban extension).

Having B&Q and Asda accessed directly via roundabouts is just tolerable, but NOT an Aldi (which involves a particularly high-turnover customer carpark) accessed straight off the single-carriageway, queue-prone South West 'ring Road'.

Increasing 'Arle Court' further as a 'retail destination' will also add to the severe load on the section of A40 coming from the Benhall Roundabout, which is currently the focus of a government anti-pollution grant.

For the forthcoming appeal, it matters not that planning officers have wilted on a 'highways network' objection, in the absence of any spine from the useless Gloucestershire Highways (who failed at the JCS Examination to contribute any credible strategic highways scheme for the massive West & NorthWest Cheltenham urban extensions, and who pronounced the Leckhampton-650 development acceptable which the Secretary of State then refused for "severe" traffic impact). Other parties can sustain these highways objections, which councillors also ought to have the local appreciation to endorse.

Refusal Reason-3 remains relevant despite the minor improvement of deleting the Costa outlet.

Recommended Action

Councillors should simply decline to determine this re-application before the forthcoming appeal debate and verdict. (The applicant cannot 'go to appeal' twice.)

At most, in case the inspector were to ask for the Committee's "mindedness", then the councillors might consider their view now, but in camera at this stage pre-Appeal.

Nothing significant has changed since this retail-led scheme was refused in January, considering that:

- (1) the Costa removal is trivial (and reversible);
- (2) nothing specific has been cited in the revised NPPF to invalidate the strong local refusal grounds, nor disqualify Cheltenham's orderly hierarchy of acceptable 'shopping centres'.

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APPLICATION NO: 18/01004/FUL	OFFICER: Mr Joe Seymour
DATE REGISTERED: 23rd May 2018	DATE OF EXPIRY: 22nd August 2018 (extension of time agreed until 31st October 2018)
WARD: Benhall/The Reddings	PARISH: N/A
APPLICANT:	Hinton Properties (Grovefield Way) Ltd
AGENT:	Hunter Page Planning
LOCATION:	Land At North Road West And Grovefield Way Cheltenham
PROPOSAL:	Hybrid application seeking detailed planning permission for 5,914 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m food retail unit (Use Class A1), with associate parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved - except access (resubmission).

Update to Officer Report

1. OFFICER COMMENTS

- 1.1 Since the committee schedule and the case officer's report were published on 10 October 2018 the local planning authority has received seven more letters of objection from individual residents and a separate letter of objection from the Reddings Residents' Association (RRA) (attached).
- 1.2 The seven individual letters of objection raise concerns with regard to issues that have already been addressed in the case officer's report, namely air pollution, light pollution and the impact on wildlife.
- 1.3 The objection from the RRA is a lengthy response that was emailed to Members directly on the morning of 15 October 2018 so there is no need to repeat the content of the representation within this update.
- 1.4 In addition to objections to the planning merits of the application, which have already been addressed in the case officer's report, the RRA response of 15 October 2018 maintains that the application has been dealt with incorrectly from a procedural standpoint for the following reasons:
 1. The officer has not allowed sufficient time to properly gain the views of consultees and the public. He has not therefore properly and objectively considered them, discussed them and sought solutions.
 2. There is no current retail policy which permits retail development on this site.
 3. The planning officer has not applied the principles and laws of natural justice and has exhibited bias in his report and correspondence.
 4. Community consultation in accordance with the Localism Act and NPPF has not been undertaken.
 5. The officer recommendation for permit is being made prematurely and mistakenly.
 6. The officer does not fully and objectively reported the facts to the planning committee officers in his report.
 7. The application is being rushed to the planning committee. This is unnecessary, premature and it should be withdrawn until a full and objective assessment has been made.
 8. It is also premature to place this matter before the planning committee officers before the appeal debate and verdict is heard in January 2019.

- 1.5 This matter is being dealt with separately and Members will be updated in due course, but at the present time Officers are satisfied that the application has been processed in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015 and there is no reason why this application cannot be determined at the 18 October 2018 planning committee.

2. CONCLUSION AND RECOMMENDATION

- 2.1 The additional letters of representation that have been received have not raised any new issues that have not already been addressed in the case officer's report. Therefore, the recommendation to permit the application subject to a s.106 agreement remains unchanged.
- 2.2 The list of planning conditions that would be attached to any planning permission that is granted has been circulated separately.

Formal Complaint- incomplete officer report to planning committee

Application 18/01004/FUL/Hybrid application – land at North Road West and Grovfield Way, The Reddings, Cheltenham

Please find attached our formal complaint and evidence that the planning officer/department are rushing this application to planning committee on 18/10/18, without properly considered all matters and consulting in accordance with the laws of Natural Justice, the Localism Act and current NPPF. The application is due to be placed before the planning committee in **3 days time (18/10/18), so time is of the essence.** It has been prepared and considered in haste by the officer and is incomplete in the respects that we set out in the attached evidence.

Summary of complaint

- 1) The officer has not allowed sufficient time to properly gain the views of consultees and the public. He has not therefore properly and objectively considered them, discussed them and sought solutions.
- 2) There is no current retail policy which permits retail development on this site.
- 3) The planning officer has not applied the principles and laws of natural justice and has exhibited bias in his report and correspondence.
- 4) Community consultation in accordance with the Localism Act and NPPF has not been undertaken.
- 5) The officer recommendation for permit is being made prematurely and mistakenly.
- 6) The officer does not fully and objectively reported the facts to the planning committee officers in his report.
- 7) The application is being rushed to the planning committee. This is unnecessary, premature and it should be withdrawn until a full and objective assessment has been made.
- 8) It is also premature to place this matter before the planning committee officers before the appeal debate and verdict is heard in January 2019.

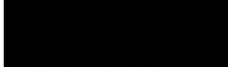
We ask that the planning committee return this matter to the planning officer asking that he provides an objective detailed report which pays due attention to the points and concerns that the residents have raised over the past 22 months and addresses them fully.

We ask that this complaint is fully investigated and responded to before the application is placed before the planning committee officers for their consideration.

We ask that this application is not returned to the planning committee, until the appeal on the previous application is completed (scheduled to commence 8/ January 2019).

Thank you for your kind attention.

Best regards
For The Reddings Residents' Association



BEng(Hons) CEng MIStructE ICIOB Registered Construction

Adjudicator

Registered Expert Witness



Re: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

1 message

Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Thu, Oct 4, 2018 at 10:47 AM

To: Joe.Seymour@cheltenham.gov.uk, Tracey.Crews@cheltenham.gov.uk

Appendix A c

Dear Mr Seymour

We refer to our previous correspondence & await your response to our email below.

As we have set out, a full, detailed & objective review of the applicant's submissions account for many hours of committee time and must be scheduled to suit availability over the limited time allowed for comments.

Many of our comments in our report are questions, many of which need to be put to other consultees who have not yet responded. If they do, you will then have a balanced view upon which to form your recommendations. Doing so will ensure that these important aspects can be considered and discussed objectively in your own report and thereby present a balanced view to the planning committee. As such we have prepared the attached report with all due haste to assist. The preparation has accounted for over 100 hours of our time. As volunteers, this is time that has to be found in evenings, weekends and holidays to the detriment of our respective families and children.

We received a note from Paul Fong at Ridge/Hunter Page yesterday, advising that following his conversation with you, you have extended the consultation for TRRA by 1 week. Whilst we thank you for this, we are uncertain what it actually means. If this application is to be presented to the planning committee on 18/10/18, then you will need to have prepared & published your report and recommendations with the agenda circa 10 or 11 October and would be unable to account for our views, or list them out in the summary of comments received section report to the committee. We have therefore decided to submit our comments and questions now for your consideration, with enough time for the several other consultees to advise you and us of their views on the concerns that we raise.

We are meeting Paul Fong on 10/10/18 and we have provided him with a copy of the attached report. The report can act as an agenda for Mr Fong & will allow him to prepare responses/consult with the design team in advance of our meeting, (which we will minute & publish to residents). To assist you/the planning committee, we will issue an addendum report on any matters which are clarified/resolved to our satisfaction following the meeting.

We repeat our extreme concern that community consultation has only been offered at such a late stage, contrary to the requirements of the Localism Act and NPPF and is then being stifled by the apparent rush to a planning committee hearing, only 3 days after the standard consultation expiry date on 15/10/18.

We remain ready to assist in positive, objective consultation on the concerns that the community has raised repeatedly since December 2016, when this first hybrid application was made, all with a view to reaching a mutually satisfactory outcome for all interested parties.

We have submitted our comments via the CBC website, but for convenience, we attach a "report" copy of the comments for your consideration.

Thank you and we look forward to hearing from you.


Chair

The Reddings Residents' Association

On Fri, Sep 28, 2018 at 12:50 PM Red Res-Assoc <thereddingsresidentsassoc@gmail.com> wrote:

Dear Mr Seymour,

Page 334

Many thanks for your reply.

To clarify, we add our responses in blue against the statements in your reply:

CBC statement:

Thank you for your email, it has been added to the planning file with all the other comments that have been made to date.

TRRA response:

We note that the email conversation with Mr Fong which was appended to our objection has not been added though. We would appreciate an explanation for this as without it, the email comment posted does not read correctly.

CBC statement

I won't respond to the specific planning objections you have raised at this time as they will take some time to digest and they will be addressed in my officer report.

TRRA response:

Thank you, we look forward to receiving this.

CBC statement:

However, I feel I need to respond to your concerns regarding the re-consultation process.

I highlighted previously that the nature of the revision is not one that statutorily requires a re-consultation process but this was carried out anyway because of the level of local interest in the proposed development. The re-consultation period is for three weeks: 18 September – 9 October. However, with the committee date set for 18 October

TRRA response:

The planning committee date has not previously been advised to us, but it is noted, thank you. As matters stand, we will be speaking in opposition.

CBC statement:

the consultation period is effectively 30 days long because any representations made up until the day of determination have to be taken into consideration.

TRRA response:

Noted.

CBC statement:

The fact that the RRA are unable to meet at its preferred venue before 9 October is not a valid reason to consult for a third time or to delay the determination of the application in any way,

TRRA response:

It is not a failure on the part of TRRA. Ridge have set the date for 10/10/18. We made it clear we were available to meet within 24 hours of the approach from Paul Fong at their offices. We publicly asked whether CBC & the developer's agent felt that a delay in order that we could consider what the developer had to say in support of the evidential gaps in their application was merited. It is apparent you do not, and that is regrettable.

CBC statement:

especially when you can still respond before the committee meeting on 18 October, a full 30 days after the revised drawings were published and 25 days after the amended supporting statements were submitted.

TRRA response:

Noted & we will continue to do so. We trust that the comments you receive will be fully digested because presently, there is much "evidence" lacking in the applicant's submission in support of it. This is disappointing, especially when CBC have had nearly 2 years to ensure that what is proposed at consultation does comply with its own planning policies and national regulations.

CBC statement:

The fact you and Paul Fong have decided to meet on 10 October separately is also not a valid reason to provide more time for you to consult within your own organisation,

TRRA response:

Not agreed - the requirement for community consultation and consideration is set out in the NPPF. The TRRA committee consults daily. However, there are over 1000 residents that we will not have the opportunity to consult with should the committee be persuaded to an alternative view at our meeting with Mr Fong.

The residents will have to live with what is, or isn't, granted planning permission. Presently, residents remain totally dismayed at both the inappropriate scale of the BMW building, and the local problems that this same applicant developer has created. This dismay has been exacerbated by a staunch refusal on the part of BMW/the developer to engage with the community in anything other than a negative way since starting work on construction and then opening the garage in September 2017. With the approach from Mr Fong, it was thought that perhaps we had a new dawn where the opinions of the residents would be treated seriously and given proper consideration, but it seems that we have not reached that stage yet. All of the residents' predictions on traffic, parking, pollution (noise & fume) arising from BMW have proven correct & the weak submissions by the applicant have proven false, contrary to the CBC and GCC Highways officers, the "expert" reports and the statements that officers made to the planning committee. The evidence of this is well documented and beyond any dispute.

The submitted BMW "expert" travel plans were supposed to integrate with the local community and thereby have minimal local effect. However, they have been discarded by BMW, and CBC won't enforce them. The planning conditions which CBC and GCC Highways attached are therefore meaningless, and history must not repeat itself with this application. It must be properly examined in an open and non-partisan way. In this application, many of the BMW reports are simply resubmitted. The reports do not address the facts of the local issues as they have emerged since 2016. Neither does the applicant address the JCS traffic evidence & the expansion of the Park & Ride to service the proposed Cyber Park, which will double the capacity to 1000 vehicles. The Cyber Park also requires the expansion of J10 M5 to 4 way, in order to be viable. These are all local plan and JCS issues. However, the recent local plan/CBC west Cheltenham team acknowledges that this J10 work probably won't be open until at least 2025, possibly not even before the end of the plan in 2033! The JCS traffic evidence predicts that J11, Arle Court roundabout, (which is immediately proximate to this site), will be at 187% of capacity until J10 becomes 4 way. The Reddings and much of West Cheltenham & beyond will grid-lock & pollution from the fumes of stationary traffic will breach permissible limits. Against all of these local plan/JCS matters, the applicant, offers no analysis at all and CBC do not seem to have required them to do so. Why not?

Similarly GCC Highways make no comment. Either this application is to be judged by the local plans, or, by the retained policies, including retail policies. It is not equitable to cherry pick policies to suit.

A change to retail on this site is contrary to the stated reasons for permitting the development, it is contrary to the stated aim of quality jobs, breaches the requirements of the NPPF in these respects and fails to take account of the entirely negative impact on the community. The other consultees and CBC must engage with these points.

The BMW building was placed on the site using a questionable category of sui generis (with alleged B1 characteristics). Concern was raised that it was a "thin entering wedge". Since its introduction this site has been wrestled out of the greenbelt by a developer argument and now A class & D class development is being sought with a promise of "jam tomorrow" in respect of a proper B1 development in phase 2 (for which only outline permission is being sought). Residents have consistently opposed any retail on the site. This position reflects current local planning policy and retained retail policy which does not permit retail on this out-of-town site. Work on drafting a new retail policy has not yet begun and the revised local plan has only just been submitted to the inspector, despite the consultations having been particularly negative, especially in the omission of any pollution control measures within it. As such, at present, there are no viable planning reasons to even start to consider permitting retail on this B1 site. That is why we are interested to hear from Mr Fong. Similarly, justification from CBC would also be welcome.

Community consultation has never been offered at any time over the past 22 months, through the several iterations of this project. We have been raising the same questions and points in considerable detail since January 2107. We are finally offered the opportunity of an explanation from the developer, but that has now become ineffective because of the apparent indecent haste to place this before the planning committee, some 4 weeks after the applicant tables a new proposal. We would ask that it be clearly noted in your report that no effective community consultation has been undertaken again, either at the instigation of CBC, or by the developer, despite the significant "public interest" to which you refer.

CBC statement

especially when you have already demonstrated that you can submit representations by yourself on behalf of the RRA

TRRA response:

Reference to previous applications and this application will confirm that TRRA generally comment late on applications. This is because we consult with residents and judge the mood of comments left by the residents on the CBC webpage beforehand. We are completely aware of the current feelings of residents in relation to this project based upon the submissions made prior to 18/9/18. Our email enquiry to you, simply sought to extend the laws of natural justice to Mr Fong. Mr Fong clearly feels he has something to say to TRRA which may sway us from our current objection (which we have previously set out in detail). We are a residents' association, not an action group. We consult widely, with the community and reflect their views. With only a few days remaining after Mr Fong's chosen date until the planning committee hearing, there is simply insufficient time for us to consult with residents further following the meeting with Mr Fong on 10/10/18. Indeed Mr Fong stated in his approach to TRRA that there were "emerging" plans. Clearly, they had already emerged before we were contacted and they are now "set in stone" as they are to be placed before the committee on 18/10/18. We would say that TRRA has never raised an objection to a proposed development which has not also been raised by the ward councillors. The ward councillors have raised a very competent and detailed objection to this application. Again this reflects the views of the community at large.

The residents presently see only a minor change in relation to the omission of Costa and some small replacement of B1 development as a consequence. There is still retail on the site, contrary to the retained CBC planning and other aspirational policies, with very clear potential for the introduction of retail to facilitate further retail. That is simply not

acceptable as currently presented. We **Page 337** Mr Fong can address these concerns to the reasonable satisfaction of residents, hence this suggestion that we should meet.

Residents are understandably wary of developers that make local applications, receive permission and then vary them. Permitting retail on this B1 site in any form sets a precedent for the developer to create a future retail village, entirely against the wishes of residents, the JCS, local plan & retail policies. In the Reddings alone, BMW, Cotswold View & The Hayloft set clear precedents for exactly this behaviour from this developer and others. As such, assurances from CBC that "what is permissioned will be built" do sound very hollow. Similarly, so does the introduction of spurious planning conditions, which CBC will not enforce. Again, Cotswold View and BMW stand as local examples where conditions have not been enforced. Retail and childcare (D class) will make the current traffic, noise and fume pollution problems considerably worse than the permissioned B1 development will. That is simple common sense. Further, the proposed opening hours for the retail elements have no local precedent, are excessive in a residential area and have not been revised to something which is more reasonable following the demise of Costa. Aldi will introduce traffic late into the evenings and at weekends, which B1 won't and employment won't be created by Aldi, because its business plan is to strip business from established stores, where job losses will then occur.

The applicant offers little/no substantive responses to the previous objections raised by the planning committee and others in respect of these points, neither is comment made regarding the health concerns on placing a nursery in the middle of a busy car park, flanked by the M5, A40 and South West Distributor road. Why have CBC not asked for this?

To clarify, in suggesting the consultation period should be extended, we simply make the point that; with the timescales which CBC have now set in respect of this proposal and the date for the planning committee meeting, then effective further community consultation after a meeting with the developer on 10/10/18 is not viable before 18/10/18. We and residents must therefore judge the development upon what has been published on the CBC website, and maintain the overwhelming objection of the residents, many of whom have already submitted detailed objections to you since this latest and the previous consultation commenced. We could be wrong, Mr Fong and/or CBC may have credible explanations. If this is the case, then the race to committee for 18/10/18 & the consequential shortened consultation period is not evidence of democracy in action.

We cannot help but feel that an opportunity to bring developer and community together has been lost. This is even more regrettable when Ridge propose having an office "up front & centre on the development" before all of the residents that oppose it. Community cohesion requirements, as set out in the NPPF, seem not to be a consideration at all for CBC in their deliberations on planning applications such as these.

CBC statement

(presumably without a full RRA meeting at the community centre which you have said is unavailable to you until 10 October).

TRRA response:

We have a committee meeting booked for that date. The whole committee offered to meet Mr Fong at his office on a date of his choice. Your comment misunderstands and misrepresents what we set out.

Our concern is that such misunderstandings can creep in when a complex matter such as this is rushed. Such haste also runs the risk that those involved with planning decisions are not able to fully consider the opinions and comments of those who take the time to comment during the consultation period.

CBC statement

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In summary, the second consultation period for this application runs until 9 October, but in effect it will run right up until 18 October so you (or anyone else) has until this later date to comment.

TRRA response:

Noted.

Kind regards,

The Reddings Residents' Association.

From: Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]**Sent:** 27 September 2018 11:26**To:** Joe Seymour; Emma Pickernell; Tracey Crews; Internet - Planning Comments; Internet - Built Environment; Alex Chalk; Alex Chalk**Cc:** Mike Collins; Councillor Nigel Britter; Councillor Garth Barnes; PFong@ridge.co.uk**Subject:** URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

Dear Mr Seymour

We refer to our previous correspondence regarding the latest submission on the 18/01004/FUL | Hybrid application at Grovefield Way.

As we set out in our previous email, although the consultation period commenced when the drawings were added to the web page on 18 September 2018, they were essentially meaningless without the substantive documentation and that was not subsequently added until 7 days later on 25/9/18, meaning that this is now effectively a 14 day consultation.

The action will prejudice Consultees' and the public's opportunity to properly examine and comment on the submission.

We note your previously-stated opinion that you have only consented to a further consultation as a courtesy. Whilst we note item 11.4 of CBC's SCI, we consider the discretion afforded to run contrary to a viable democratic process, perhaps this is the reason that the *"Council is drawing up an amended plans procedure which will set out a standard approach in this matter."* as item 11.4 states?

On 25/9/18, we received an approach from Mr Fong to meet with us because *" We have new plans emerging and I would like to table these with you"*.

We made a substantive response (copied below), to Mr Fong to facilitate such a meeting. In reply (copied below) Mr Fong has simply set out an offer to meet on 10/10/18, which is the day following the closure of the consultation period.

This the very first attempt that has been made at any sort of contact or consultation with the local community, since this saga began in December 2016. We are doing our best to be equitable in our deliberations, but, in order to make the meeting between us and Mr Fong have any useful purpose, we will need time to consult with the residents following the meeting. As you will see from the email below, we offered to try and arrange a public meeting shortly thereafter to which officers and Mr Fong would also be invited.

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Whilst we will continue to meet with Mr Fong, we presently find that the new documents continue to make a very poor economic case to support retail on site, because most of the new jobs will simply reflect trade taken from the Asda, Morrisons & other small local stores. This is not "job creation"

First: Aldi is expected to create 16 full time equivalent jobs generating wages of £320,000. This equates to an average of £20,000 per employee. We have checked Aldi and the store assistant hourly rate which varies between £8.85 and £10.41. Although Aldi workers generally work 25 hours per week, if you used a 35 hour week as a comparison the annual salary would range would be £16,017 to £18,946.

The figures quoted therefore seem a bit high, unless they are including the employer contribution to the employee pension scheme, any other benefits, an adjustment for any managerial post or a longer full time week. Notwithstanding, they are still lower paid jobs, when the purpose for development on this "prized" greenbelt land was to create high paid "quality" jobs paying an average of £35,000 per annum.

Second, we have considered the economic net benefit to the community/Cheltenham Borough:

The total rates payable by Aldi would be £141,700. This equates to £2,725 per week or £389 per day. This represents 10.55% of the total net rateable value for the site. (£141,700/ £1,342,600). CBC's audited final accounts for the 2017/2018 year and total income was around £105m. The Aldi contribution would represent 0.13% of total income.

Thirdly, the latest economic assessment does not include trade forecasts for Aldi, with reference to the applicant's submission *which shows the anticipated trade which will be diverted to the new Aldi.*

The table seems to suggest that total trade for the new Aldi is £11.47m, but this includes £1.6m diverted from the existing Asda. For an effective analysis, this transfer of trade from the same company needs to be deducted.

The new total is £9.87m.

The new Aldi is predicted to divert £3.45m from Asda. So 35% of the new Aldi's business will be taken from an existing store, which is situated across the road.

If you add £2.87m predicted to be diverted from Morrisons, then the total of diverted trade becomes £6.32m.
So 64% of Aldi's business will be diverted from 2 stores both within 5 minutes drive.

Any retail development will serve an existing surrounding area, and food retailing spending is fairly consistent, compared to luxury goods or capital expenditure.

The proposed over-provision of food retailers in one area will only dilute the amount of existing trade amongst the retailers present, and not lead to any more jobs. Rather, it can only lead to uncertainty and possible restructuring within the existing stores.

So, purely from an economic value, an Aldi cannot be justified on this prime B1 site, especially as the site was identified as being key to the economic "B1" future of Cheltenham, when permission was granted in the 2007 appeal. The contribution it will make to CBC's annual income is negligible and the majority of Aldi's business on this site will be at the detriment of the existing supermarkets and established jobs and trade patterns.

Further, in order to attract new business from outside the area, it is beyond doubt that it will generate more traffic and pollution than an equivalent B1 office standing on this plot, because there will be so many journeys by so many different people for a single short period. The developers have also said they have reduced the car parking for Aldi and will put up barriers for the office car parks. That also limits Aldi's capacity and the risk of over-spill to carparks of others, the park and ride site and residential streets, which are already suffering

greatly from the BMW staff parking issues. The **Page 340** to limit the Aldi parking to this extent will exacerbate the already significant local traffic issues. This outcome is eminently foreseeable, is contrary to the NPPF and is not dealt with by the applicant in his submission.

The Park & Ride's ability to serve the community, visitors to the town and the Cyber Park will be compromised by the additional traffic and parking, which again makes Aldi unviable on this site.

Statistics are being manipulated by the applicant in the presentation of B1 jobs created by reducing the area for each worker from the standard 18.3m² per person to 13.6m² per person. The BMW building is "retail" & has already removed a substantial number of potential B1 jobs from the original site. It is disingenuous to say 86% of the site is now B1. It is closer to 45% when including BMW. Before the Phase 2 B1 units are constructed and occupied, it will be closer to 80% retail. The applicant has only removed a small Costa unit from the retail element; the substantive application and case for any A class or D class on the site has not been made.

In summary we just cannot see that creating 16 lower paid jobs is a strong justification for building an Aldi.

Planning considerations

This is an 'out of town' location for Retail; and Cheltenham's Retail Plan (JCS Review) has not even been drafted, therefore the unofficial Arle Court/The Reddings 'shopping area' cannot be extended (along Grovefield Way) with support from current planning policy.

No updated accurate traffic modelling, has been provided & the surveys supplied are not valid, as they were conducted in a non-neutral month. However many of the applicant's consultants may seek to justify this breach, the fact remains that the data is not valid and there has been a huge amount of time available to the applicant to correct this.

Traffic impact was a reason for refusal in December 2017 and has not been addressed at all by the applicant since that date.

We have yet to complete our assessment of the site drawings, landscaping and revised drainage proposals, and will forward our comments once we have done so. We have followed the scrutiny to which application "18/01180/FUL | *Erection of three storey B1(a) office building with associated car parking, landscaping and infrastructure | Land To Rear Of Nuffield Hospital Hatherley Lane Cheltenham Gloucestershire*" (that we are supporting) has been subjected to by GCC Local Flood Authority, Environmental Health and GCC Highways Liaison Officer, which we applaud. However, this is in marked contrast to the scrutiny that this application has been subjected to. We also note your agreement that the whole presentation of the scheme is confusing.

We still have grave misgivings about placing a childrens' nursery, with almost no "green areas" in which to play safely within a carpark, next to the A40 trunk road and the South West Distributor Road (Grovefield Way) when there is so much current concern being expressed about the effect that fumes and pollution have on the mental health and lung development of infants. This concern is exacerbated by the immediate proximity to the Aldi car park where there will be such a huge turnaround of vehicles associated with short duration shopping trips. Several members of the planning committee raised similar concerns. We do not see how the applicant has addressed these in the latest submission. This must be a matter upon which the Environmental Health officer must have an opinion.

The NPPF is clear that new developments must support health and well being; we do not presently see that the applicant makes this case at all.

Page 341

Summary.

We welcome the approach for community consultation. However, if that consultation is to be after the consultation has closed, then we have no alternative but to maintain our objection as set out above, supplemented by the detail in our previous objections and scrutiny of the drawings and drainage details submitted on 25/9/18.

If the consultation is extended by a further 2 weeks to 23 October 2018, we will have the opportunity to consult with Mr Fong, consider his presentation, arrange a public meeting and take residents' opinions, before commenting either with objection/neutral/or, support.

In order for the other consultees to properly consider the new submission we aver that they will also need greater time to make an adequate assessment.

This email has been copied to Mr Fong and by copy, we request his agreement to an extension of the consultation period, in order that we may take the consultation into account in our comments.

We look forward to hearing from you.

[REDACTED] CEng MStructE ICIOB Registered Construction Adjudicator and Expert Witness

Chair

The Reddings Residents' Association

----- Forwarded message -----

From: **Paul Fong** <PFong@ridge.co.uk>

Date: Tue, Sep 25, 2018 at 3:31 PM

Subject: RE: Grovefield Way Application

To: Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Cc: Mike Collins <cllr.mike.collins@cheltenham.gov.uk>, Nigel Britter <cllr.nigel.britter@cheltenham.gov.uk>, [REDACTED]

Hi Gary

Thanks for your e-mail.

My diary is currently free on the 10th October and I would be happy to organise a meeting at my office at Thornbury House. What time would be best for you?

I have copied in my PA so she can fix a time for us to use the board room here.

Kind Regards

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Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Cheltenham office pfong@ridge.co.uk

email disclaimer

cid:image005.jpg@01D44F44.537EB410

From: Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]

Sent: 25 September 2018 14:38

To: Paul Fong

Cc: Mike Collins; Nigel Britter

Subject: Re: Grovefield Way Application

Dear Mr Fong,

Thank you for your email and suggestion of a meeting. We would be welcome the opportunity to consult with you.

We are aware that some "indicative" drawings removing the Costa have been submitted to CBC by you and that CBC have put them out to consultation. We liaised with the officer and were told that amended D&A statements, etc. were to be submitted by you, but at the time of writing, nothing further has been posted on the CBC website.

The Committee has discussed and we will therefore be posting a further objection on the current consultation, because essentially none of our principle concerns have been addressed. We do welcome the removal of the retail element of Costa and replacing it with B1. However, the "indicative" statement gives no form of permanence or commitment, and a variation application could easily be made to convert the unit back to a coffee shop once permission for the remainder of the site has been granted if an "A-class" element is introduced as a precedent. Precedents for this behaviour were set with the BMW project and we would be naive to believe that history would not repeat itself. Further, without the revised D&A's etc., we cannot determine any changes to proposed opening hours, etc.

We asked CBC whether the consultation was therefore too early, but their response simply said that there were 3 weeks for us to comment. We have delayed in the hope that something informative would however be posted on the CBC website. Your approach is therefore welcomed.

Your reference to "new plans emerging" suggests that fully revised documents will not be submitted during the remaining few days of the consultation.

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Presently, TRRA remain supportive of B1 development on the site (subject to satisfactory detail), and opposed to "public" retail on the site. A small retail offering on the site to service the local need of the development, one that kept to the basic core hours of the offices, would be understood by us if you believed that it was important, despite the abundance of existing alternatives within a few minutes walk. However, the scale proposed for Aldi remains unacceptable, for all of the reasons that we have set out in our detailed objections to date.

We do not believe that the site is suitable for a childcare facility with all of the fumes and pollution that will be generated by the development, particularly the retail element, as well as fumes from the enlarged P&R, Grovefield Way and the A40. However, there is less opposition to this than to the retail elements. We are willing to engage in debate and review this position if appropriate.

What we would hope we can achieve is a detailed "forensic" assessment of the proposed plan on items where the proposal is simply not detailed enough, or appear fanciful because it can't be achieved, eg re-profiling a 2.5m deep embankment to the boundary of North Road West without destroying the hedge, or getting storm & foul water to flow uphill/ not cause local flooding. Also, not causing further disruption to ground water flows as has occurred following BMW, resulting in significant damage to the newly re-surfaced North Road West. A viable and enforceable traffic plan is also required.

We are happy to meet with, and have a presentation from you, but if we are going to reach an agreement that is likely to be acceptable to residents, this does need to be a 2-way technical debate please. As you will be aware, the committee comprises professional building consultants, civil/structural engineers, architects, surveyors, project managers, bankers, construction adjudicator & expert witness amongst others, so we can engage at a highly technical level of debate, if necessary.

Following our meeting, it may be that a public meeting would be a next step, and may be appropriate for the planners and yourselves to attend. This would involve the committee in a lot of work though.

We do also need to resolve the "consultation" with CBC before proceeding. Our next TRRA meeting (when we a room booked at The Reddings community centre on North Road West) is 10/10/18, but this date follows the closure of the CBC consultations. Clearly, if the plans are "still emerging", the CBC consultation is a nonsense. We would therefore suggest that Ridge contact CBC to stop the consultation, advise that you are now consulting the community before finalising the submission and secure agreement from CBC to another consultation, in order to give residents and the wider community a chance to comment, once the form of your final proposal is ready for submission. We would appreciate some indication from you as to when you believe that the submission will be finalised and submitted, and a target date for the planning committee meeting, so that we can plan any public meetings etc.

We are happy to meet you on 10/10/18 at our next committee meeting, but appreciate that may be too long for you to wait. Finding another viable local venue before 10/10/18, would be difficult, unless you want to book a room at the Jury Inn. We note that Ridge's office is at: Thornbury House, 18 High Street, Cheltenham. The committee is currently conducting an online poll to see what evenings may be available for us to meet you at your offices, if that is agreeable?

I look forward to hearing from you.

Best wishes


Chairperson

The Reddings Residents' Association

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On Mon, Sep 24, 2018 at 4:08 PM Paul Fong <PFong@ridge.co.uk> wrote:

Dear Sirs

I wonder whether it would be possible to come and visit you and let you know about the changes that are proposed to our application at Grovefield Way? We have new plans emerging and I would like to table these with you.

I have copied Mike Collins and Nigel Britter into this e-mail.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Cheltenham office pfong@ridge.co.uk

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 **TRRA Consultation - October 2018.pdf**
453K



Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

RE: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

1 message

Paul Fong <PFong@ridge.co.uk>

Wed, Oct 3, 2018 at 10:04 AM

To: Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Cc: Mike Collins <mcollinsjd@yahoo.co.uk>, Nigel Britter <nigel.britter@btopenworld.com>, Simon Wheeler <saw50@mac.com>, Simon Wheeler <cllr.simon.wheeler@cheltenham.gov.uk>, Mike Collins <cllr.mike.collins@cheltenham.gov.uk>, Nigel Britter <cllr.nigel.britter@cheltenham.gov.uk>

Gary

I have spoken with the planning officer and agreed that we should allow the residents Association a further week in which to submit reps to the application.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Cheltenham office pfong@ridge.co.uk

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**From:** Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]**Sent:** 28 September 2018 16:39**To:** Paul Fong**Cc:** Mike Collins; Nigel Britter; Simon Wheeler; Simon Wheeler; Mike Collins; Nigel Britter**Subject:** Re: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

Thanks Paul

We look forward to our meeting & the prospect of some movement from the planning officers.

Kind regards

Gary

The Reddings Residents' Association

On Fri, Sep 28, 2018 at 4:33 PM Paul Fong <PFong@ridge.co.uk> wrote:

Hi Gary

Yes I would be happy to attend at 18:15 on the 10 October.

I will let you know if I get any movement from the planning officer.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Tel: 01242 222007 Office: 01242 230066 Mobile: 07770 268650

Cheltenham office pfong@ridge.co.uk

email disclaimer

 [cid:image005.jpg@01D44F44.537EB410](#)

From: Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]

Sent: 28 September 2018 15:24

To: Paul Fong; Mike Collins; Nigel Britter; Simon Wheeler; Simon Wheeler; Mike Collins; Nigel Britter

Subject: Re: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

Hi Paul

Thank you for your email.

You will have received a copy of our email to Mr Seymour in which we represent our case in the interests of democracy and community cohesion.

We would be pleased if you would be kind enough to talk to Mr Seymour and see if any any mutually satisfactory agreement regarding consultations with the community can be reached. Thank you for your assistance.

Your offer to meet on 10/10/18 coincides with our committee meeting, in will be discussing the proposal & finalising our case & presentations regarding this application, amongst other matters. The Councillors usually attend, but otherwise attendance is committee members and other interested organisations, rather than a public meeting.

Apologies for the delay in replying to your email, but I have been waiting confirmation of availability from the community centre.

We have now been able to secure the small meeting room in the community centre from 18-15 hours on 10/10/18.

As we now have to assume & prepare for a planning committee meeting on 18/10/18, are you available to meet with us at the community centre at say 18-15 hrs on 10/10/18. This is in North Road West, immediately adjacent to the site, so,if we need to, we can move outside to inspect and illustrate any points, in the interests of clarity. Following your presentation, we can then hold our usual meeting, starting at 19-30, where we will discuss your presentation.

We look forward to hearing from you to confirm & to meeting with you shortly.

Have a good weekend

Kind regards



The Reddings Residents' Association

On Fri, Sep 28, 2018 at 10:11 AM Paul Fong <PFong@ridge.co.uk> wrote:

Gary

I share your frustration. If it is ok with you, I will speak to Joe Seymour to see if I can get the residents association a more meaningful time upon which to respond to this matter. Whilst I respect your arguments, I am a firm believer that democracy must prevail.

I will come back to you shortly.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Cheltenham office pfong@ridge.co.uk

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Error! Filename not specified.

From: Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]

Sent: 27 September 2018 11:26

To: joe.seymour@cheltenham.gov.uk; emma.pickernell@cheltenham.gov.uk;
Tracey.Crews@cheltenham.gov.uk; dcomments@cheltenham.gov.uk; planning@cheltenham.gov.uk;
Alex Chalk; Alex Chalk

Cc: Mike Collins; Nigel Britter; Garth Barnes; Paul Fong

Subject: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way

Dear Mr Seymour

We refer to our previous correspondence regarding the latest submission on the [18/01004/FUL | Hybrid application](#) at Grovefield Way.

As we set out in our previous email, although the consultation period commenced when the drawings were added to the web page on 18 September 2018, they were essentially meaningless without the substantive documentation and that was not subsequently added until 7 days later on 25/9/18, meaning that this is now effectively a 14 day consultation.

The action will prejudice Consultees' and the public's opportunity to properly examine and comment on the submission.

We note your previously-stated opinion that you have only consented to a further consultation as a courtesy. Whilst we note item 11.4 of CBC's SCI, we consider the discretion afforded to run contrary to a viable democratic process, perhaps this is the reason that the *"Council is drawing up an amended plans procedure which will set out a standard approach in this matter."* as item 11.4 states?

On 25/9/18, we received an approach from Mr Fong to meet with us because " *We have new plans emerging and I would like to table these with you*".

We made a substantive response (copied below), to Mr Fong to facilitate such a meeting. In reply (copied below) Mr Fong has simply set out an offer to meet on 10/10/18, which is the day following the closure of the consultation period.

This the very first attempt that has been made at any sort of contact or consultation with the local community, since this saga began in December 2016. We are doing our best to be equitable in our deliberations, but, in order to make the meeting between us and Mr Fong have any useful purpose, we will need time to consult with the residents following the meeting. As you will see from the email below, we offered to try and arrange a public meeting shortly thereafter to which officers and Mr Fong would also be invited.

Whilst we will continue to meet with Mr Fong, we presently find that the new documents continue to make a very poor economic case to support retail on site, because most of the new jobs will simply reflect trade taken from the Asda, Morrisons & other small local stores. This is not "job creation"

First: Aldi is expected to create 16 full time equivalent jobs generating wages of £320,000. This equates to an average of £20,000 per employee. We have checked Aldi and the store assistant hourly rate which varies between £8.85 and £10.41. Although Aldi workers generally work 25 hours per week, if you used a 35 hour week as a comparison the annual salary would range would be £16,017 to £18,946.

The figures quoted therefore seem a bit high, unless they are including the employer contribution to the employee pension scheme, any other benefits, an adjustment for any managerial post or a longer full time week. Notwithstanding, they are still lower paid jobs, when the purpose for development on this "prized" greenbelt land was to create high paid "quality" jobs paying an average of £35,000 per annum.

Second, we have considered the economic net benefit to the community/Cheltenham Borough:

The total rates payable by Aldi would be £141,700. This equates to £2,725 per week or £389 per day. This represents 10.55% of the total net rateable value for the site. (£141,700/ £1,342,600). CBC's audited final accounts for the 2017/2018 year and total income was around £105m. The Aldi contribution would represent 0.13% of total income.

Thirdly, the latest economic assessment does not include trade forecasts for Aldi, with reference to the applicant's submission *which shows the anticipated trade which will be diverted to the new Aldi*.

The table seems to suggest that total trade for the new Aldi is £11.47m , but this includes £1.6m diverted from the existing Asda. For an effective analysis, this transfer of trade from the same company needs to be deducted.

The new total is £9.87m.

The new Aldi is predicted to divert £3.45m from Asda. So 35% of the new Aldi's business will be taken from an existing store, which is situated across the road.

If you add £2.87m predicted to be diverted from Morrisons, then the total of diverted trade becomes £6.32m. **So 64% of Aldi's business will be diverted from 2 stores both within 5 minutes drive.**

Any retail development will serve an existing surrounding area, and food retailing spending is fairly consistent, compared to luxury goods or capital expenditure.

The proposed over-provision of food retailers in one area will only dilute the amount of existing trade amongst the retailers present, and not lead to any more jobs. Rather, it can only lead to uncertainty and possible restructuring within the existing stores.

So, purely from an economic value, an Aldi cannot be justified on this prime B1 site, especially as the site was identified as being key to the economic "B1" future of Cheltenham, when permission was granted in the 2007 appeal. The contribution it will make to CBC's annual income is negligible and the majority of Aldi's business on this site will be at the detriment of the existing supermarkets and established jobs and trade patterns.

Further, in order to attract new business from outside the area, it is beyond doubt that it will generate more traffic and pollution than an equivalent B1 office standing on this plot, because there will be so many journeys by so many different people for a single short period. The developers have also said they have reduced the car parking for Aldi and will put up barriers for the office car parks. That also limits Aldi's capacity and the risk of over-spill to carparks of others, the park and ride site and residential streets, which are already suffering greatly from the BMW staff parking issues. The current proposal to limit the Aldi parking to this extent will exacerbate the already significant local traffic issues. This outcome is eminently foreseeable, is contrary to the NPPF and is not dealt with by the applicant in his submission.

The Park & Ride's ability to serve the community, visitors to the town and the Cyber Park will be compromised by the additional traffic and parking, which again makes Aldi unviable on this site.

Statistics are being manipulated by the applicant in the presentation of B1 jobs created by reducing the area for each worker from the standard 18.3m² per person to 13.6m² per person. The BMW building is "retail" & has already removed a substantial number of potential B1 jobs from the original site. It is disingenuous to say 86% of the site is now B1. It is closer to 45% when including BMW. Before the Phase 2 B1 units are constructed and occupied, it will be closer to 80% retail. The applicant has only removed a small Costa unit from the retail element; the substantive application and case for any A class or D class on the site has not been made.

In summary we just cannot see that creating 16 lower paid jobs is a strong justification for building an Aldi.

Planning considerations

This is an 'out of town' location for Retail; and Cheltenham's Retail Plan (JCS Review) has not even been drafted, therefore the unofficial Arle Court/The Reddings 'shopping area' cannot be extended (along Grovefield Way) with support from current planning policy.

No updated accurate traffic modelling, has been provided & the surveys supplied are not valid, as they were conducted in a non-neutral month. However many of the applicant's consultants may seek to justify this breach, the fact remains that the data is not valid and there has been a huge amount of time available to the applicant to correct this.

Traffic impact was a reason for refusal in December 2017 and has not been addressed at all by the applicant since that date.

We have yet to complete our assessment of the site drawings, landscaping and revised drainage proposals, and will forward our comments once we have done so. We have followed the scrutiny to which application ["18/01180/FUL | Erection of three storey B1\(a\) office building with associated car parking, landscaping and infrastructure | Land To Rear Of Nuffield Hospital Hatherley Lane Cheltenham Gloucestershire"](#) (that we are

supporting) has been subjected to by GCC Local Flood Authority, Environmental Health and GCC Highways Liaison Officer, which we applaud. However, this is in marked contrast to the scrutiny that this application has been subjected to. We also note your agreement that the whole presentation of the scheme is confusing.

We still have grave misgivings about placing a childrens' nursery, with almost no "green areas" in which to play safely within a carpark, next to the A40 trunk road and the South West Distributor Road (Grovefield Way) when there is so much current concern being expressed about the effect that fumes and pollution have on the mental health and lung development of infants. This concern is exacerbated by the immediate proximity to the Aldi car park where there will be such a huge turnaround of vehicles associated with short duration shopping trips. Several members of the planning committee raised similar concerns. We do not see how the applicant has addressed these in the latest submission. This must be a matter upon which the Environmental Health officer must have an opinion.

The NPPF is clear that new developments must support health and well being; we do not presently see that the applicant makes this case at all.

Summary

We welcome the approach for community consultation. However, if that consultation is to be after the consultation has closed, then we have no alternative but to maintain our objection as set out above, supplemented by the detail in our previous objections and scrutiny of the drawings and drainage details submitted on 25/9/18.

If the consultation is extended by a further 2 weeks to 23 October 2018, we will have the opportunity to consult with Mr Fong, consider his presentation, arrange a public meeting and take residents' opinions, before commenting either with objection/neutral/or, support.

In order for the other consultees to properly consider the new submission we aver that they will also need greater time to make an adequate assessment.

This email has been copied to Mr Fong and by copy, we request his agreement to an extension of the consultation period, in order that we may take the consultation into account in our comments.

We look forward to hearing from you.

██████████ Eng(Hons) CEng MIStructE ICIOB Registered Construction Adjudicator and Expert Witness

Chair

The Reddings Residents' Association

----- Forwarded message -----

From: **Paul Fong** <PFong@ridge.co.uk>

Date: Tue, Sep 25, 2018 at 3:31 PM

Subject: RE: Grovefield Way Application

To: Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Cc: Mike Collins <cldr.mike.collins@cheltenham.gov.uk>, Nigel Britter <cldr.nigel.britter@cheltenham.gov.uk>, ██████████

Hi Gary

Thanks for your e-mail.

My diary is currently free on the 10th October and I would be happy to organise a meeting at my office at Thornbury House. What time would be best for you?

I have copied in my PA so she can fix a time for us to use the board room here.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP

Cheltenham office pfong@ridge.co.uk

email disclaimer

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From: Red Res-Assoc [mailto:thereddingsresidentsassoc@gmail.com]

Sent: 25 September 2018 14:38

To: Paul Fong

Cc: Mike Collins; Nigel Britter

Subject: Re: Grovefield Way Application

Dear Mr Fong,

Thank you for your email and suggestion of a meeting. We would be welcome the opportunity to consult with you.

We are aware that some "indicative" drawings removing the Costa have been submitted to CBC by you and that CBC have put them out to consultation. We liaised with the officer and were told that amended D&A statements, etc. were to be submitted by you, but at the time of writing, nothing further has been posted on the CBC website.

The Committee has discussed and we will therefore be posting a further objection on the current consultation, because essentially none of our principle concerns have been addressed. We do welcome the removal of the retail element of Costa and replacing it with B1. However, the "indicative" statement gives no form of permanence or commitment, and a variation application could easily be made to convert the unit back to a coffee shop once permission for the remainder of the site has been granted if an "A-class" element is introduced as a precedent. Precedents for this behaviour were set with the BMW project and we would be naive to believe that history would not repeat itself. Further, without the revised D&A's etc., we cannot determine any changes to proposed opening hours, etc.

We asked CBC whether the consultation was therefore too early, but their response simply said that there were 3 weeks for us to comment. We have delayed in the hope that something informative would however be posted on the CBC website. Your approach is therefore welcomed.

Your reference to "new plans emerging" suggests that fully revised documents will not be submitted during the remaining few days of the consultation.

Presently, TRRA remain supportive of B1 development on the site (subject to satisfactory detail), and opposed to "public" retail on the site. A small retail offering on the site to service the local need of the development, one that kept to the basic core hours of the offices, would be understood by us if you believed that it was important, despite the abundance of existing alternatives within a few minutes walk. However, the scale proposed for Aldi remains unacceptable, for all of the reasons that we have set out in our detailed objections to date.

We do not believe that the site is suitable for a childcare facility with all of the fumes and pollution that will be generated by the development, particularly the retail element, as well as fumes from the enlarged P&R, Grovefield Way and the A40. However, there is less opposition to this than to the retail elements. We are willing to engage in debate and review this position if appropriate.

What we would hope we can achieve is a detailed "forensic" assessment of the proposed plan on items where the proposal is simply not detailed enough, or appear fanciful because it can't be achieved, eg re-profiling a 2.5m deep embankment to the boundary of North Road West without destroying the hedge, or getting storm & foul water to flow uphill/ not cause local flooding. Also, not causing further disruption to ground water flows as has occurred following BMW, resulting in significant damage to the newly re-surfaced North Road West. A viable and enforceable traffic plan is also required.

We are happy to meet with, and have a presentation from you, but if we are going to reach an agreement that is likely to be acceptable to residents, this does need to be a 2-way technical debate please. As you will be aware, the committee comprises professional building consultants, civil/structural engineers, architects, surveyors, project managers, bankers, construction adjudicator &, expert witness amongst others, so we can engage at a highly technical level of debate, if necessary.

Following our meeting, it may be that a public meeting would be a next step, and may be appropriate for the planners and yourselves to attend. This would involve the committee in a lot of work though.

We do also need to resolve the "consultation" with CBC before proceeding. Our next TRRA meeting (when we a room booked at The Reddings community centre on North Road West) is 10/10/18, but this date follows the closure of the CBC consultations. Clearly, if the plans are "still emerging", the CBC consultation is a nonsense. We would therefore suggest that Ridge contact CBC to stop the consultation, advise that you are now consulting the community before finalising the submission and secure agreement from CBC to another consultation, in order to give residents and the wider community a chance to comment, once the form of your final proposal is ready for submission. We would appreciate some indication from you as to when you believe that the submission will be finalised and submitted, and a target date for the planning committee meeting, so that we can plan any public meetings etc.

We are happy to meet you on 10/10/18 at our next committee meeting, but appreciate that may be too long for you to wait. Finding another viable local venue before 10/10/18, would be difficult, unless you want to book a room at the Jury Inn. We note that Ridge's office is at: Thornbury House, 18 High Street, Cheltenham. The committee is currently conducting an online poll to see what evenings may be available for us to meet you at your offices, if that is agreeable?

I look forward to hearing from you.

Best wishes


Chairperson

The Reddings Residents' Association

On Mon, Sep 24, 2018 at 4:08 PM Paul Fong <PFong@ridge.co.uk> wrote:

Dear Sirs

I wonder whether it would be possible to come and visit you and let you know about the changes that are proposed to our application at Grovefield Way? We have new plans emerging and I would like to table these with you.

I have copied Mike Collins and Nigel Britter into this e-mail.

Kind Regards

Paul

Paul Fong MRTPI

Partner

For Ridge and Partners LLP


Cheltenham office pfong@ridge.co.uk

email disclaimer

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10/12/2018

Gmail - RE: URGENT - 18/01004/FUL | Hybrid application - Grovefield Way



Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Concerns - tonight's meeting - on planning application: 18/01646/The erection of two dwellings, and formation of new vehicular access | Blenheim Villa The Reddings Cheltenham Gloucestershire GL51 6RT

1 message

Red Res-Assoc <thereddingsresidentsassoc@gmail.com>

Thu, Sep 20, 2018 at 2:14 PM

To: Garth Barnes <cllr.garth.barnes@cheltenham.gov.uk>

Cc: Nigel Britter <nigel.britter@btopenworld.com>

Bcc: Mike Collins <mcollinsjd@yahoo.co.uk>, Simon Wheeler <saw50@mac.com>, [REDACTED]

Dear Chair of the Planning Committee

We understand that Cllr' Britter has been in contact with you regarding our concerns at actions by the planning officers in respect of this matter, which we feel to be contrary to the laws of natural justice. Cllr' Britter has passed on advice following his discussions that we should put our concerns in writing and that they would be presented to the committee. We thank you for the opportunity.

We have attached below, our email to you and the committee dated 13 September 2018 in which we first raised the concerns on this application. A copy was also forwarded to the officers, but they have not responded, neither has our email been posted on the website, although a "rant" from someone (presumed to be the developer by the use of "we" terms) has been posted.

Our concerns:

1. We had to remind the officers to post our comments onto the website after they failed to do so.
2. Cllr' Britter's comments were submitted to CBC but were never published on the website, until after the officer report had been written and the information pack for the meeting published.
3. Neither our objection, nor Cllr' Britter's objection were included in the information pack issued on 12 September 2018. Following us raising the matter with CBC, the comments were added as a "consultee" pack on 13 September 2018.
4. Neither our comments nor Cllr' Britter's comments are acknowledged, or discussed within the officers report. This gives us the impression that they have been completely disregarded by the officers, contrary to "Natural Justice".
5. A further letter of objection sent to the planning committee and officers is also not visible on the website. A copy is attached for you information titled "Blenheim Villa Ring Road Objection".
6. The applicant's amended submission includes adjustment to comply with a small part of paragraph 110 of the NPPF. It does not deal with the substantial portion of the paragraph and the officer report does not deal with the new NPPF requirements all. The officers did not list paragraph 110 as a reason for the refusal of the first application, which we believe to be an error.
7. The applicants drawings do not present the hedge as it actually is, if they did it would be clear that the splays cannot be achieved.
8. The applicant "rant" is a blatant attempt to influence the impartial debate by threat of appeal.
9. GCC Highways and the planning officers have provided pre-application to the applicant on the presentation and viability of this application. They are now "marking their own homework" and we wonder whether this dual role removes some of the objectivity that is necessary to truly act in the wider interests of the community and borough?

Although I write as Chair of TRRA, I am a Chartered Engineer with 38 years experience of relevant structural, civil and building design and planning experience in Gloucestershire and across the UK. I am Managing Director of a forensic building consultancy and I also undertake appointments as Expert Witness on such matters as these. Our committee also includes Architects and Surveyors, all of whom are residents in The Reddings and also have considerable expertise in these matters. As such, we do speak with considerable collective professional knowledge and experience.

We are concerned from feedback that has reached us through various channels that TRRA are perceived as "troublemakers" that "object to everything". We don't and we aren't. We are supporting B1 development on a local

10/12/2018

Gmail - Concerns - tonight's meeting - on planning application: 18/01646/The erection of two dwellings, and formation of new vehic...

site next to Asda. We only comment on matters that are of concern to a significant number of residents and we have never raised an objection that was not also raised by the ward councillors.

Whilst we remain objective, are keen to join a balanced debate with the officers and present only facts as we see them, we cannot help but wonder whether we, the community and the planning committee are being treated fairly at present.

Many thanks for your time and assistance.

Best wishes

Gary Fulford
Chairperson

The Reddings Residents' Association

----- Forwarded message -----

From: **Red Res-Assoc** <thereddingsresidentsassoc@gmail.com>

Date: Thu, Sep 13, 2018 at 1:47 PM

Subject: Fwd: 18/01646/The erection of two dwellings, and formation of new vehicular access | Blenheim Villa The Reddings Cheltenham Gloucestershire GL51 6RT

To: Garth Barnes <cldr.garth.barnes@cheltenham.gov.uk>, <cldr.paul.baker@cheltenham.gov.uk>, <cldr.stephen.cooke@cheltenham.gov.uk>, <cldr.diggory.seacome@cheltenham.gov.uk>, <cldr.victoria.atherstone@cheltenham.gov.uk>, <cldr.bernard.fisher@cheltenham.gov.uk>, <cldr.dilys.barrell@cheltenham.gov.uk>, Mike Collins <cldr.mike.collins@cheltenham.gov.uk>, <cldr.wendy.flynn@cheltenham.gov.uk>, <cldr.alex.hegenbarth@cheltenham.gov.uk>, <cldr.karl.hobley@cheltenham.gov.uk>, <cldr.paul.mccloskey@cheltenham.gov.uk>, <cldr.tony.oliver@cheltenham.gov.uk>, Simon Wheeler <cldr.simon.wheeler@cheltenham.gov.uk>, <cldr.john.payne@cheltenham.gov.uk>, <Tracey.Crews@cheltenham.gov.uk>, <emma.pickernell@cheltenham.gov.uk>, <dccomments@cheltenham.gov.uk>, <planning@cheltenham.gov.uk>

Dear members of the planning committee and officers,

We note that the information pack for the committee meeting was made available yesterday, but it has 2 very critical omissions. Neither of the detailed objections from Councillor Nigel Britter, nor ourselves were included. As the points raised in both objections are not discussed in the officer's report, we are concerned that these points have not been adequately covered.

We have therefore attached copies of Councillor Britter's objection, our own objection and a copy of the detail of a Highways Act Section 142 agreement, for your convenience.

To all intents and purposes, the application is unchanged from that which the committee debated in detail in July 2018. The principle differences relate to the reasons for refusal in relation to the highway entrance. They are summarised as:

1. The revised NPPF had not been published at the time of the last application.
2. The amount of the hedge to be removed has been increased in acknowledgement of the requirements of new paragraph 110 in the revised NPPF. This change is made to improve safety for pedestrians entering the site. However, the submitted design ignores all of the other provisions in paragraph 110 regarding the worsening of safety for the general public including, pedestrians, young children, cycleway users and disabled users of the existing pavement and users of the designated national cyclepath.
3. A section 142 licence is introduced by the applicant as a means to allow the new owners of the properties/the developers to maintain the hedge and the visibility splays. However:
 1. This licence carries financial and legal responsibilities and a cost in maintaining £5million public liability insurance and working on the hedge itself.
 2. The hedge is not drawn correctly on the plan, because the existing hedge has substantially overgrown the footpath/cyclepath and also enveloped signage.
 3. The license is intended for those wanting to cultivate a hedge, not destroy it.
 4. The licence can be revoked at any time and without penalty.
 5. With the granting of the licence, the licensee could undertake any scope of work, including complete removal of the whole hedge.
 6. The hedge/visibility splays cannot be maintained from 1 March to 1 August each year without breaching the Wildlife and Countryside Act.

We attach a copy of paragraph 110 of the NPPF below for reference:

"110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;**
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;**
- c) create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;**
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and**
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."**

Almost none of these issues are addressed by the applicant. Indeed, those items that we have emphasised in bold underlining have, in our opinion, actually been breached; in particular paragraphs 110a, c and d.

The proposal will create a "shared access" scheme in relation to the public pavement and national cycle way, contrary to the current Department for Transport (DfT) injunction. In response to the injunction, GCC Highways has already disregarded its own Manual for Street Design and will now only strictly follow DfT advice. The advice of GCC Highways in respect of this application is not readily understood, except perhaps in relation to the pre-application advice given, where GCC are now "marking their own homework" and may not have a truly objective opinion.

We ask that you again consider how vehicles will safely turn into this development, as you previously debated. Vehicles will be approaching at 40MPH (or more based on the traffic survey evidence) on a designated distributor road. Traffic behind will not be expecting them to stop and turn, and may mistake a left signal for an intended maneuver at the nearby roundabout. The driver wanting to turn into the site will also have to cross a busy pavement and cycleway, and will have multiple hazards to contemplate at speed. These vehicles will include delivery vans and others who are also looking out for a gap in the hedge because the properties' locations, will not be shown on any map, or Sat Nav, for some considerable time following their construction. The proposed vehicular access is a clear and unnecessary risk to the public, particularly disabled users, and children on foot, or on bikes.

Further, the application itself identifies that turning provision on site is only suitable for cars. Delivery vans, recycling and refuse vehicles, would need to reverse onto, or reverse off the property, against the flow of traffic. If reversing off, the visibility splays are wholly inadequate.

In our opinion there are clear grounds for maintaining the current refusal under the following headings: [NPPF – Section 7 and paragraphs 53, 108, 109 and 110](#); [JCS policy SD4B and SD4C, JCS – INF1](#); [Emerging local plan policy D3, G12 and G13](#); [current local policy CP4 and CP7](#). The proposal is also contrary to [DEFRA 2007 "habitation of principal importance"](#)

It would be much appreciated if you are able to review the attached documents (which CBC planners have not provided in your information pack) ahead of your site visit. Our detailed objection provides further background, photographs and data to support our object.

Many thanks for your attention and we look forward to the debate at the meeting on Thursday 20/9/18.

Best wishes on behalf of the Committee,

██████████ BEng (Hons) CEng MStructE ACIOB MAICA Listed UK Register of Expert Witness'

Chairperson The Reddings Residents' Association

4 attachments

 **TRRA Blenheim 2 application objection Sept 18.pdf**
808K

 **Highways Act 1980 - Section 142.pdf**
81K

 **Cllr Britter objection.pdf**

10/12/2018

Gmail - Concerns - tonight's meeting - on planning application: 18/01646/The erection of two dwellings, and formation of new vehic...

33K



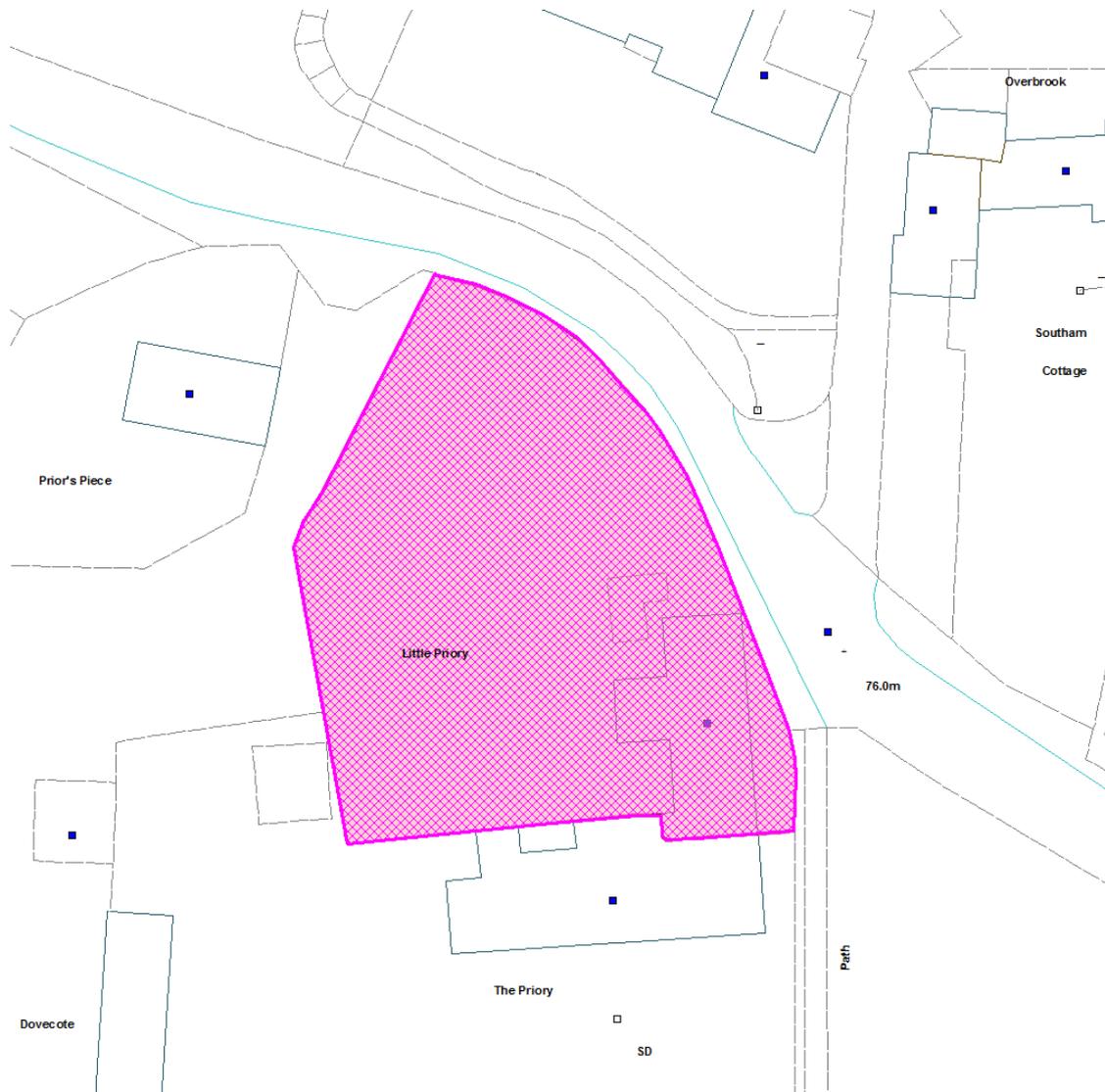
BlenheimVilla RingRoad Objection.pdf

77K

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APPLICATION NO: 18/01318/FUL&LBC	OFFICER: Mr Harry Du Bois-Jones
DATE REGISTERED: 4th July 2018	DATE OF EXPIRY: 29th August 2018
WARD: Prestbury	PARISH: Prestbury
APPLICANT:	Mr And Mrs Andrew Blair
AGENT:	DJ Planning
LOCATION:	Little Priory, Mill Street, Cheltenham
PROPOSAL:	Blocking up of existing vehicular access and creation of new gated vehicular access within boundary wall

RECOMMENDATION: Refuse



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The property is a grade II listed dwelling on Mill Street. It is also located within the Prestbury Conservation Area.
- 1.2 The applicant is seeking both planning permission and listed building consent to block up an existing access and create a new, wider, vehicular access onto the highway.
- 1.3 This address had a similar application for a new access refused in 2015, as it was considered to have a harmful impact on the heritage of the dwelling and highway safety. In 2016 an extension was approved at Little Priory, which involved replacing a garage with a kitchen/dining room development. This took the building line closer to the existing access, making it almost impossible to park a car off-street.
- 1.4 This application is at planning committee at the request of Councillor John Payne, who considers the scheme would be an enhancement to the streetscene, and that there are precedents in the local area.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Conservation Area

Flood Zone 2

Listed Buildings Grade 2

Relevant Planning History:

13/00627/PREAPP CLO

Alteration to North End of property, remodelling 1960's addition to create a larger kitchen and garden room at ground floor level and a small study and a refitted bathroom at first floor level

91/00369/LA 27th June 1991 PER

Alteration To The Stone Wall Bordering Mill Street As Amended By Letter Dated 15 Jun 91

12/00239/CACN 14th March 2012 NOOBJ

1) 2 x Birch crown reduce in height by approx 20 % and reshape. 2) Mature apple - remove mistletoe and crown reduce by approx. one third

84/01336/LA 11th October 1984 PER

Extension to existing dwelling to provide a conservatory

15/01115/FUL 21st April 2016 REF

Move gated vehicle access 10 to 12 metres further up Mill Street.

15/01115/LBC 21st April 2016 REF

Move gated vehicle access 10 to 12 metres further up Mill Street.

16/00745/FUL 16th September 2016 PER

Proposed removal of mid-late 20th century extensions, adaptation of the existing garage utility spaces and extension to create a larger kitchen, living and dining room spaces at ground floor level, and a refitted bathroom and an additional bedroom at first floor level.

16/00745/LBC 16th September 2016 GRANT

Proposed removal of mid-late 20th century extensions, adaptation of the existing garage utility spaces and extension to create a larger kitchen, living and dining room spaces at ground floor level, and a refitted bathroom and an additional bedroom at first floor level.

16/02190/DISCON 19th December 2016 DISCHA

Discharge of condition 4 (windows, external doors & roof-light) on planning permission ref. 16/00745/LBC

17/00617/CACN 27th March 2017 NOOBJ

Fell a smooth arizona cypress

18/01318/LBC PDE

Blocking up of existing vehicular access and creation of new gated vehicular access within boundary wall

3. POLICIES AND GUIDANCE

Saved Local Plan Policies

CP 4 Safe and sustainable living

CP 7 Design

BE 5 Boundary enclosures in conservation areas

BE 10 Boundary enclosures to listed buildings

Adopted Joint Core Strategy Policies

SD4 Design Requirements

SD8 Historic Environment

INF1 Transport Network

Supplementary Planning Guidance/Documents

Residential Alterations and Extensions (2008)

Prestbury conservation area character appraisals and management plan (June 2009)

National Guidance

National Planning Policy Framework

4. CONSULTATIONS

Parish Council

16th July 2018

No objection.

GCC Highways

17th July 2018

I refer to the above planning application received on the 10th July 2018.

With regards to the above site; under our Highway's Standing advice criteria we do not need to be consulted on this application and this can be dealt with by yourselves with the aid of our guidance.

If you have any queries please do not hesitate to contact me.

5th September - In regards to the above planning application I have the following comments to make; The applicant proposes the blocking up of existing vehicular access and creation of a new gated vehicular access within boundary wall on land at Little Priory. Vehicular access will be taken directly off of the Mill Street a class 4 highway subject to a 30mph with pedestrian footway to the northern boundary of the site, there are no parking restrictions along Mill Street and on-street parking does occur.

Based on the submitted plans I can confirm that the annotated forward visibility splays to the west (Left) existing and proposed are incorrectly drawn, however from my initial desk top assessment and further assessment I have been able to determine if the proposed access is materially worse than the existing access arrangement.

Submitted plan proposed site access ref: 1803DWG02B displays forward visibility splays of 20m to the west (Left), I can confirm that in fact 26m forward visibility can be achieved and the existing access arrangement only providing 24m of forward visibility. I note that both existing and proposed vehicular accesses are in fact sub-standard, however the proposed access does provide a marginal increase (Improvement) to emerging/forward visibility splays, I can confirm after researching the latest personal injury collision data (PIC), that no recorded incidents have been reported in the vicinity of the site in relation to the site access, However the LHA would require the existing vehicular access to be permanently stopped up and this can be dealt with by way of planning condition, therefore I raise no Highway objection subject to the following conditions being attached;

Access

The vehicular access shall be laid out and constructed in accordance with the submitted plan drawing no.1803DWG02B with the area of driveway within at least 5.0m of the carriageway edge of the public road surfaced in bound material, and shall be maintained thereafter.

Reason: - To reduce potential highway impact by ensuring that a safe and secure access is laid out and constructed that minimises the conflict between traffic and cyclists and pedestrians in accordance with paragraph 108 and 110 of the National Planning Policy Framework.

Closure of Access

The vehicular access hereby permitted shall not be brought into use until all existing vehicular accesses to the site (other than that intended to serve the development) have been permanently closed, and the footway/verge in front has been reinstated, in accordance with details to be submitted to and agreed in writing beforehand by the Local Planning Authority.

Reason: - To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with the National Planning Policy Framework.

Parking & Turning

The development hereby permitted shall not be occupied until the vehicular parking and turning facilities have been provided in accordance with the submitted plan drawing no.1803DWG02 rev B, and those facilities shall be maintained available for those purposes thereafter.

Reason:- To ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with the National Planning Policy Framework.

Visibility

The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4M back along the centre of the access measured from the public road

carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 4.8m left (West) and 5.8m right (East) (the Y points). The area between those splays and the carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.6m and 2.0m at the Y point above the adjacent carriageway level.

Reason:- To reduce potential highway impact by ensuring that adequate visibility is provided and maintained and to ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with the National Planning Policy Framework.

NOTE:

The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the Applicant is required to obtain the permission of Amey Gloucestershire on 08000 514 514 or gcchighway@amey.co.uk before commencing any works on the highway.

Statement of Due Regard

Consideration has been given as to whether any inequality and community impact will be created by the transport and highway impacts of the proposed development. It is considered that no inequality is caused to those people who had previously utilised those sections of the existing transport network that are likely to be impacted on by the proposed development.

It is considered that the following protected groups will not be affected by the transport impacts of the proposed development: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, other groups (such as long term unemployed), social-economically deprived groups, community cohesion, and human rights.

Heritage and Conservation

2nd August 2018

The existing opening is likely to have been formed in the twentieth century to serve Little Priory when it became a separate dwelling; historically the Priory site having been accessed from the south. With a width of 2.7m, the proposed gateway with a width of 4.8m, it entailed the loss of less historic fabric and is located in a discreet position near the building and leaves a good length of uninterrupted wall running to the north of it.

The wall provides a continuous and uniform historic form of enclosure in the setting of Little Priory. The proposal mean the loss of historic fabric and uniformity in the curtilage listed wall and present an incongruous form that would harm the setting of Little Priory by introducing a timber sliding door not in keeping with the vernacular and breaching the historic traditional enclosure. As the local planning authority could not control how long the gate was left open for, the resultant 'hole' in the wall would further detract from the regular form and encompassing nature of the boundary wall. These aspects would detract from how the listed building is experienced and harm the curtilage listed wall, therefore causing harm to the significance of the assets.

The proposed extent of the parking/turning area is ambiguous. Drawings 1803DWG02 and 1803DWG03 as per the Transport Report submitted as part of the application defines an extent, whereas drawing 2 of the application which includes a plan detail of the parking area fails to show its full size. Given this it is not possible to comment on the impact of this aspect.

The application proposes to replace all cementitious mortar joints with lime mortar; though details on the scale of works, composition of the mortar or method of repair have not been supplied. Appropriate re-pointing would be beneficial to the appearance and longevity of the

wall; however when balanced against the harm that the breach in the wall will cause it is not considered to out-weight the negative impact.

The historic limestone wall makes a positive contribution to the character and significance of the street-scene within the Prestbury Conservation Area. This is reflected in the Prestbury Conservation Area Character Appraisal and Management Plan (Supplementary Planning Document) (June 2009) (the appraisal), which states that the area is “special” due to a number of factors including, “The area has retained its distinctive village character...through the visual dominance of historically and architecturally important buildings...and the retention of many historic plot boundaries...Cotswold stone walls form a distinctive feature within the Conservation Area and contribute to shaping its identity.” [page 4, paragraph 1.13, (a) and (e)]. The proposal to demolish part of such a wall would therefore harm the significance of the conservation area.

The National Planning Policy Framework (NPPF) (July 2018) at paragraph 193, requires Local Planning Authorities when considering the impact of a proposed development on the significance of a designated heritage asset, to give great weight to the conservation of the asset; and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm equates to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 196 of the NPPF states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, that this harm should be weighed against the public benefits of the proposal.

The proposal will harm the significance of the designated heritage assets and the degree is less than substantial. When balancing the harm against the public benefits of the proposal the NPPF requires great weight to be given to the conservation of the assets. The application provides no substantiated evidence as to the public benefit of the scheme; therefore the greater weight is clearly with the conservation of the designated heritage assets.

Conclusion and recommendation

The proposal would lead to less than substantial harm to the significance of the listed building and conservation area. The scheme would harm the setting of the listed building, result in the loss of historic fabric and introduce an incongruous feature that will harm key characteristics of the conservation area, and this harm is not out-weighted by any substantiated public benefit.

The scheme is contrary to Section 16 (2) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Policy SD8 (Historic Environment) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (adopted December 2017) and should therefore be refused.

27th September 2018

The building known as Little Priory is partially attached to a building to the south and is situated in relatively large grounds which encompass it to the north and west. The road known as Mill Street flanks part of the site boundary.

Significance

The building is listed at Grade II (list entry number: 1091906).

Constructed in limestone in the mid eighteenth century and subject to extension in 1886 and c. 2016. Little Priory was formerly the northern wing to a building known as the Priory [listed at Grade II (list entry number: 1091902)]; both buildings are now in separate occupancy.

Little Priory was formerly a wing of the Priory which dates from the fourteenth century. The Priory was originally a monastic holding and by 1538 the building was called the manor house or rectory.

A tithe map of the 1840s depicts the northern end of the Priory site, now occupied in part by Little Priory, as what is very likely to have been by this period a walled garden area with paths. A wall running across the site on the southern edge of this area provides a boundary between the garden and the wider Priory site. The wall subject to the proposal is a remnant of the built boundary of this historic site.

The wall bounding the site is considered to be curtilage listed. It is constructed of coursed and dressed limestone with coping stones. A timber gated opening is situated towards the southern end of the wall.

The proposal site is located within the Prestbury Conservation Area; a designated heritage asset.

Legislation and policy context

The Planning (Listed Building and Conservation Areas) Act 1990

The National Planning Policy Framework (July 2018)

Prestbury Conservation Area Character Appraisal and Management Plan (Supplementary Planning Document) (June 2009)

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (adopted December 2017) Policy SD8: Historic Environment. (JCS)

Proposal

Blocking up of existing vehicular access and creation of new gated vehicular access within boundary wall (subject to a revision of 18 September 2018).

The scheme includes the provision of parking/turning area within the site and proposes lime mortar joints to replace all cement mortar joints.

Comment

The scheme has been subject to a revision, drawing 2A (18 September 2018), which presents a wider breach than the initial proposal. The revision has not overcome the previous conservation position therefore the initial conclusion and recommendation remain.

Conclusion and recommendation

The proposal would lead to less than substantial harm to the significance of the listed building and conservation area. The scheme would harm the setting of the listed building, result in the loss of historic fabric and introduce an incongruous feature that will harm key characteristics of the conservation area, and this harm is not out-weighed by any substantiated public benefit.

The scheme is contrary to Section 16 (2) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Policy SD8 (Historic Environment) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (adopted December 2017) and should therefore be refused.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	3
Total comments received	0
Number of objections	0
Number of supporting	1
General comment	0

5.1 Three letters were sent to neighbouring properties, one comment was received in support of the scheme. This comment is summarised below.

- New access will relieve congestion on Mill Street, and the use of a sliding gate can be very successful.

6. OFFICER COMMENTS

6.1 The main considerations with this application are the impact to the listed building, the wider conservation area, and highways safety.

Design and layout

6.2 Local Plan policy CP7 and JCS policy SD4 require development to be of a high standard of architectural design to complement and respect neighbouring development.

6.3 Local Plan policies BE5 and BE10 seek to conserve the historic nature of boundary enclosures to listed buildings and within the wider conservation area.

6.4 JCS policy SD8 requires development to conserve and enhance the settings of heritage assets.

6.5 The scheme effectively proposes to relocate the current vehicle access to a position further north along the boundary wall, as well as widening the access and introducing an electric sliding gate.

6.6 The comments of the conservation officer are provided above and make it clear that the proposal results in a loss of historic fabric which would be harmful to the setting of the listed building and would introduce an incongruous feature into the conservation area. These concerns are not outweighed by any perceived public benefits of the proposal.

6.7 Overall, the scheme fails to comply with JCS policy SD8 and Local Plan policies BE5 and BE10.

Access and highway issues

6.8 Joint Core Strategy policy INF1 states that development should not have a severe impact on transport networks.

6.9 The comments of the Highways Officer are provided above. Members will note that the proposed access is considered to be acceptable in terms of highway safety and as such no objection is raised to the proposal on highway grounds.

6.10 Overall the scheme complies with policy INF1.

7. CONCLUSION AND RECOMMENDATION

- 7.1 The proposals would result in a more convenient parking arrangement for the occupants and would have the minor public benefit of repointing the wall. However these benefits are not considered to be sufficient to outweigh the harm which would come about as a result of the removal of a large section of wall. As such the Officer recommendation is to refuse planning permission and listed building consent for the reason outlined below.

8. REFUSAL REASONS

- 1 The proposal would lead to less than substantial harm to the significance of the listed building and conservation area. The scheme would harm the setting of the listed building, result in the loss of historic fabric and introduce an incongruous feature that will harm key characteristics of the conservation area, and this harm is not out-weighed by any substantiated public benefit.

As such the scheme is contrary to Section 16 (2) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Policy SD8 (Historic Environment) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (adopted December 2017) and does not comply with Policies BE5 and BE10 of the Local Plan (2006), and SD8 of the Joint Core Strategy (2017).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the authority cannot provide a solution that will overcome the reason for refusal set out above.

As a consequence, the proposal cannot be considered to be sustainable development and therefore the authority had no option but to refuse planning permission.

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APPLICATION NO: 18/01318/FUL		OFFICER: Mr Harry Du Bois-Jones	
DATE REGISTERED: 4th July 2018		DATE OF EXPIRY : 29th August 2018	
WARD: Prestbury		PARISH: PREST	
APPLICANT:	Mr And Mrs Andrew Blair		
LOCATION:	Little Priory, Mill Street, Cheltenham		
PROPOSAL:	Blocking up of existing vehicular access and creation of new gated vehicular access within boundary wall		

REPRESENTATIONS

Number of contributors	1
Number of objections	0
Number of representations	0
Number of supporting	1

Priors Piece
 Mill Street
 Cheltenham
 Gloucestershire
 GL52 3BQ

Comments: 22nd July 2018

I am pleased to support this application for a new vehicle access to Little Priory. As a neighbour with a similar electrically operated sliding door I can say that the system is very successful , and the new access will help relieve the congestion on the corner leading up to the Plough caused by parked vehicles.

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APPLICATION NO: 18/01620/FUL	OFFICER: Mr Gary Dickens
DATE REGISTERED: 23rd August 2018	DATE OF EXPIRY: 18th October 2018
WARD: Park	PARISH:
APPLICANT: Mr Remo Potente	
AGENT:	
LOCATION: Wellesbourne, Oakfield Street, Cheltenham	
PROPOSAL: Single storey rear extension (part retrospective)	

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application relates to Wellesbourne, Oakfield Street. The site is a two storey semi-detached dwelling located on a residential road in the Tivoli character area of the central conservation area.
- 1.2 The application proposes a single storey rear extension in order to provide a garden room. Works have already commenced on site as the applicant believed this to fall under permitted development. Subsequently a request was made by the Local Authority for a part retrospective planning permission application to be submitted.
- 1.3 The application is before committee at the request of Cllr Harman due to concern over the potential impact on neighbouring properties. Members will visit the site as part of planning view.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport Safeguarding over 45m
Conservation Area

Relevant Planning History:

None

3. POLICIES AND GUIDANCE

Joint Core Strategy

SD 4 Design Requirements
SD 14 Health and Environmental Quality

Adopted Local Plan Policies

CP 4 Safe and sustainable living
CP 7 Design

Supplementary Planning Guidance/Documents

Residential Alterations and Extensions (2008)
Central conservation area: Tivoli Character Area and Management Plan (July 2008)

National Guidance

National Planning Policy Framework

4. CONSULTATIONS

None

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	5
Total comments received	2
Number of objections	2
Number of supporting	0
General comment	0

- 5.1** Five letters have been sent to neighbouring properties, a site notice displayed and an advert published in the Gloucestershire Echo. Two responses have been received objecting to the proposal.
- 5.2** Representations have been circulated in full to Members but, in brief, the main objections relate to:
- Unacceptable design which is not subservient and harmful to the character of the existing property and wider conservation area.
 - Impact on neighbouring amenity, primarily a loss of privacy and unacceptable level of noise and disturbance.

6. OFFICER COMMENTS

6.1 Determining Issues

- 6.2** The main considerations for this application are the impact of the works on the existing building and wider conservation area, together with the potential impact on neighbouring amenity.

6.3 The site and its context

- 6.4** The application site lies within the Tivoli character area of the central conservation area. Unlike other character areas, Tivoli has a uniformity of houses which provides a unique and distinctive character. The historic maps show the application site and Oakfield Street as a whole to have been constructed by 1902. The character appraisal states how *“Tivoli is clearly visible in plan form as a compact grid of terraced houses”*. Although the site is semi-detached, it clearly forms part of this dense and compact character.

6.5 Design and layout

- 6.6** The Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury (JCS) notes in Policy SD4 how well thought out design is crucial in producing sustainable places to live. The JCS states how development should *“respect the character of the site and its surroundings”* and *“should be of a scale, type, density and materials appropriate to the site and its setting”*.
- 6.7** This is reinforced through Local Plan Policy CP7 which calls on development to be of a high standard of architectural design. Paragraph 4.18 of the Local Plan advises that *‘Extensions to existing buildings need to be carefully designed to respect the character and the scale of the existing building or group of buildings....The most important consideration is that an extension should not detract from the original.’*
- 6.8** The Local Planning Authority has adopted design guidance relating to residential alterations and extensions through a Supplementary Planning Document (SPD). One of the five basic design principles set out within this document relates to subservience. Here the document advises that *“an extension should not dominate or detract from the original building, but play a supporting role”*.
- 6.9** The proposed single storey extension would extend beyond the rear elevation of the existing two storey rear wing by approximately 3.5m and measure approximately 4.7m in width. The extension will be constructed from blockwork with a painted render finish, and aluminium bi-fold doors to the side (north) and rear (east) elevations. The extension will have a flat roof finish which has an overall height of approximately 3.1m.

- 6.10** The proposed extension is considered to be subservient to the existing building and will play a supporting role. The National Planning Policy Framework (NPPF) states in paragraph 130 that “*where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development*”. A relatively modern design approach has been taken but this will not be to the detriment of the existing building or the wider conservation area. The application has been informally discussed with a conservation officer who is satisfied that the impact on the public realm is minimal.
- 6.11** The proposed single storey extension is deemed to accord with JCS Policy SD4 and Local Plan Policy CP7, as well as design advice contained within the SPD and NPPF.
- 6.12 Impact on neighbouring property**
- 6.13** The JCS stipulates in Policy SD14 that development must not cause unacceptable harm to the amenity of neighbouring properties and this is supported through Local Plan Policy CP4. Two of the five basic design principles within the SPD relate to neighbouring amenity - maintaining privacy and ensuring adequate daylight.
- 6.14** Two letters of objections have been received from adjoining neighbours and the concerns raised are noted in section 5.2 above. The concerns relating to the design aspect of the application have been discussed as part of the ‘Design and Layout’ section above. As well as the application site the neighbouring property 1 Oakfield Street was also visited. Planning permission was granted for a single storey extension to no. 1 in 2017 (ref: 17/00790/FUL) and this has also been considered when determining this application.
- 6.15** Concerns over an unacceptable level of noise and disturbance have also been raised. This is primarily due to two sets of bi-fold doors being proposed, one of which faces towards and is in close proximity to the boundary of 1 Oakfield Street. It is acknowledged that this is perhaps an unusual arrangement as bi-fold doors tend to be positioned opening onto a larger area of amenity space. However, it is not considered that this will result in an unacceptable level of noise or disturbance compared to what would be the case if a standard window or door were in this position.
- 6.16** The proposal passes the standard daylight test and is not considered to have any significant overbearing on neighbouring properties. The levels of overlooking from this single storey extension would not cause an unacceptable loss of privacy in what is already a built up and tightly compacted urban area.
- 6.17** Based on the above, the proposal would appear to be in accordance with Policy SD4 of the JCS and Local Plan Policy CP4.

7. CONCLUSION AND RECOMMENDATION

- 7.1** In conclusion, the application is considered to be in accordance with the policy requirements of the JCS, the Cheltenham Local Plan and advice contained within the SPD and the NPPF. The recommendation is therefore to approve this application subject to the conditions below.

8. CONDITIONS

- 1 The planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

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APPLICATION NO: 18/01620/FUL		OFFICER: Mr Gary Dickens	
DATE REGISTERED: 23rd August 2018		DATE OF EXPIRY : 18th October 2018	
WARD: Park		PARISH:	
APPLICANT:	Mr Remo Potente		
LOCATION:	Wellesbourne Oakfield Street Cheltenham		
PROPOSAL:	Single storey rear extension (part retrospective)		

REPRESENTATIONS

Number of contributors	2
Number of objections	2
Number of representations	0
Number of supporting	0

Bevington
1 Oakfield Street
Cheltenham
Gloucestershire
GL50 2UJ

Comments: 23rd August 2018
Letter attached.

Hanley Villa
Oakfield Street
Cheltenham
Gloucestershire
GL50 2UJ

Comments: 10th September 2018

We are writing to object to the planning application, submitted retrospectively, for a rear extension to Wellesbourne, Oakfield Street.

Wellesbourne is semi-detached with our house and shares our northern boundary. On the other side of its lot, a passage-way separates Wellesbourne from 1 Oakfield Street.

Wellesbourne previously had a small extension that was in poor repair. We are not surprised that the new owner wanted to replace this, but we are shocked by the unneighbourly way in which he has approached this, and by the overwhelming impact of the new building.

The owner of Wellesbourne did not submit a planning application prior to starting work. His neighbours were not alerted to the nature of his plans prior to the work starting (he says he knocked on our door when we were on holiday). The speed with which the work took place, much of which happened while we and the neighbour at 1 Oakfield Street were on holiday, has meant that the main structural elements were erected before anyone had a chance to comment.

We consider this to be underhand behaviour, with the effect that there has been no opportunity to discuss the proposed design of the extension and to suggest alterations that would have less

impact on the neighbourhood. The owner of Wellesbourne also did not serve a Party Wall Notice, thus failing to give us the opportunity to review the proposals.

Oakfield Street is in a Conservation area, characterised by small lots with mainly terraced housing, separated at the rear by mature gardens. This distinctive character is threatened by the erection of large extensions which not only disrupt the appearance and scale of the existing buildings, but also impinge upon the gardens.

In our view, the extension at Wellesbourne has not been designed to "respect the character and scale of the existing buildings or group of buildings", as required by Paragraph 4.18 of the Local Plan. The new building extends across almost the entire width of the property, leaving only a small gap with the property wall to the north (adjoining 1 Oakfield Street). It also extends out considerably further than the previous extension. As a consequence, the area of garden has been considerably reduced; although not visible from the street, this has an impact on the overall character of the area and its enjoyment by its residents.

The height of the extension contributes to its overbearing effect. The height is at its maximum on our boundary because a parapet has been added to the roof line; the necessity for this is not clear from the plans submitted.

The impact of the height is keenly felt by the neighbour in 1 Oakfield Street since the extension casts significant shadow on her property, to a degree that will cause unacceptable harm to her enjoyment of her house and garden. The amenity value of her property is further damaged by the fact that the new side elevation, now significantly closer to the property line, has been designed with bifolding doors. It appears from the plans that the existing back door of Wellesbourne will be turned into a window, so it must be assumed that the bifold doors, either to the side or the rear, will be used as the new back door. With large bifold doors on both the side and rear extensions we can expect an increase in noise levels that could affect several neighbours, as well as a reduction in privacy for 1 Oakfield Street.

While recognising that there has been a shift in policy towards more leniency in approving proposals, we believe that this should be considered an important test case for the acceptable limits to development within a conservation area, and within a neighbourhood built to a scale where neighbours' use of their own property can have a significant impact on the amenity of others. We are aware that there has been significant turnover and 'improvement' of properties in Tivoli in recent years, some no doubt with a view to quick resale. We have also observed some common features to recent 'improvements' that constitute a shift in the character of the area; increases to floorspace don't just have a visual impact but also increase property prices and thus exclude less affluent households. It would be sad if a neighbourhood with such a special character was altered by builders who know that, by constructing too quickly for anyone to object, they will be allowed to push through developments that are out of keeping and affect the lives of their neighbours. And once a few are allowed to do this, we can only expect more to follow suit.

1 Oakfield Street
Cheltenham
GL50 2UJ

23 August 2018

Dear Sirs

Re. Planning Application 18/01620/FUL

I am writing to strongly object to the retrospective planning application at Wellesbourne, Oakfield Street on the following grounds.

1. Local Plan Policy CP7 requires development to be of a high standard of architectural design and complement and respect neighbouring development

Paragraph 4.18 of the Local Plan advises that '*Extensions to existing buildings need to be carefully designed to respect the character and scale of the existing building or group of buildings. The most important consideration is that an extension should not detract from the original*'. Further design guidance in the Council's adopted Supplementary Planning Document: Residential Alterations and Extensions (February 2008) advises one of the five basic design principles is that, '*an extension should not dominate or detract from the original building but play a supporting role*'.

The benefit of a retrospective planning application is that the design can now clearly be seen. The extension has an unacceptable level of overbearing and not in character with the surrounding area. It extends beyond the rear of the property by approximately 3.8m and measures almost the full width of the property. The plans submitted do not allow for the roof and the overhang which when taken into account increases the overall size and height to an unacceptable level. The side elevation extends beyond the rear of the property by approximately 4.3m. This is excessive, has an overbearing effect and dominates the original building. It is out of keeping with the scale and design of the original house and is harmful to its original character.

In addition, the side wall of the extension and roof overhang is not parallel to the original house and extends beyond the line of the neighbouring extension on the opposite side which conflicts with the submitted plans. It is also out of proportion to the attached neighbouring extension and unbalances the symmetry of the semi-detached properties.

Furthermore, the property is in a Conservation area. Whilst the extension may not be visible from the road, an extension of this size does not preserve or enhance the special character and appearance of the area.

2. Local Plan Policy CP4 refers to development not causing 'unacceptable harm to the amenity of adjoining land users'.

The extension has bifolding doors in the side elevation. The open plan nature of this design will mean that sound will carry a lot easier when the doors are open compared to a solid brick wall. This will result in an unacceptable level of noise and disturbance adversely affecting my property and amenities. There is less than 1m between the side elevation with the bifold doors and the seating area in my garden and approximately 3m to my kitchen window. The design, position and size of these doors also creates overlooking into all the rooms at the rear of my property. This will cause significant harm to the enjoyment and privacy of my garden and habitable rooms at the rear of my property.

This should be avoided by only placing doors in the rear wall of the extension in line with other extensions in the area.

Please see the attached photos in support of my objections.

Yours faithfully



APPLICATION NO: 18/01620/FUL	OFFICER: Mr Gary Dickens
DATE REGISTERED: 23rd August 2018	DATE OF EXPIRY : 18th October 2018
WARD: Park	PARISH:
APPLICANT:	Mr Remo Potente
LOCATION:	Wellesbourne, Oakfield Street, Cheltenham
PROPOSAL:	Single storey rear extension (part retrospective)

ADDITIONAL REPRESENTATIONS

Wellesbourne
Oakfield Street
Cheltenham
Gloucestershire
GL50 2UJ

Comments: 12th October 2018
Letter attached.



Wellesbourne
Oakfield St
Cheltenham
GL50 2UJ

The Planning Team
Municipal Offices
Promenade
Cheltenham
GL50 9SA

11th October 2018

Dear Mr Dickens,

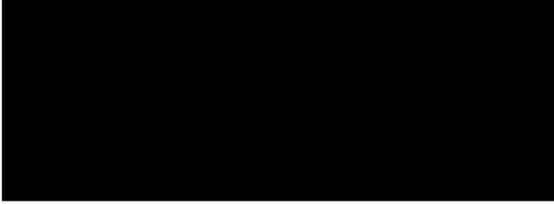
Ref: Wellesbourne, Oakfield St – Proposed Rear Extension

Further to my application for part retrospective planning permission for my single storey extension I would like to make the following points;

1. I apologise for the premature commencement of building work. This was solely due to inaccurate advice and my mistaken belief that my extension comprised permitted development. As you will be aware, as soon as I was notified of the exemption from permitted development for properties in a conservation area, I ceased all work and submitted my application.
2. I have and continue to address my neighbours concerns regarding our joint boundary. The wall and roof were constructed in their present form to rectify what would have otherwise been a water ingress hazard. The parapet and roof have been designed to provide; i, structural integrity and a clear junction, ii, drainage and diversion of rainwater for both properties, iii, aesthetics and proportion.
3. I note that both objections oppose my application on the grounds of loss of amenity to 1 Oakfield Street due to alleged; i, loss of privacy and ii, noise and disturbance. In these respects the double glazing in the North and East elevation are more than compliant with FENSA acoustic and thermal specification and have a value of 1.4 UV. If I did not replace the previous elevation with the proposed extension there would have been no acoustic protection from the same area of external space.
4. With regard to the character of the conservation area, I am aware of numerous extensions similar to mine which provide invaluable accommodation and amenity. My extension is only as visible as my garden from the upper floor of a few neighbouring properties, not from the road. To the South, at Zlin House, there is a double extension. I am sure that I don't need to draw your attention to my neighbours extension to the South, nor the permission granted to my neighbour at 1 Oakfield Street (17/00790/FUL).

I look forward to hearing from your in due course.

Yours sincerely

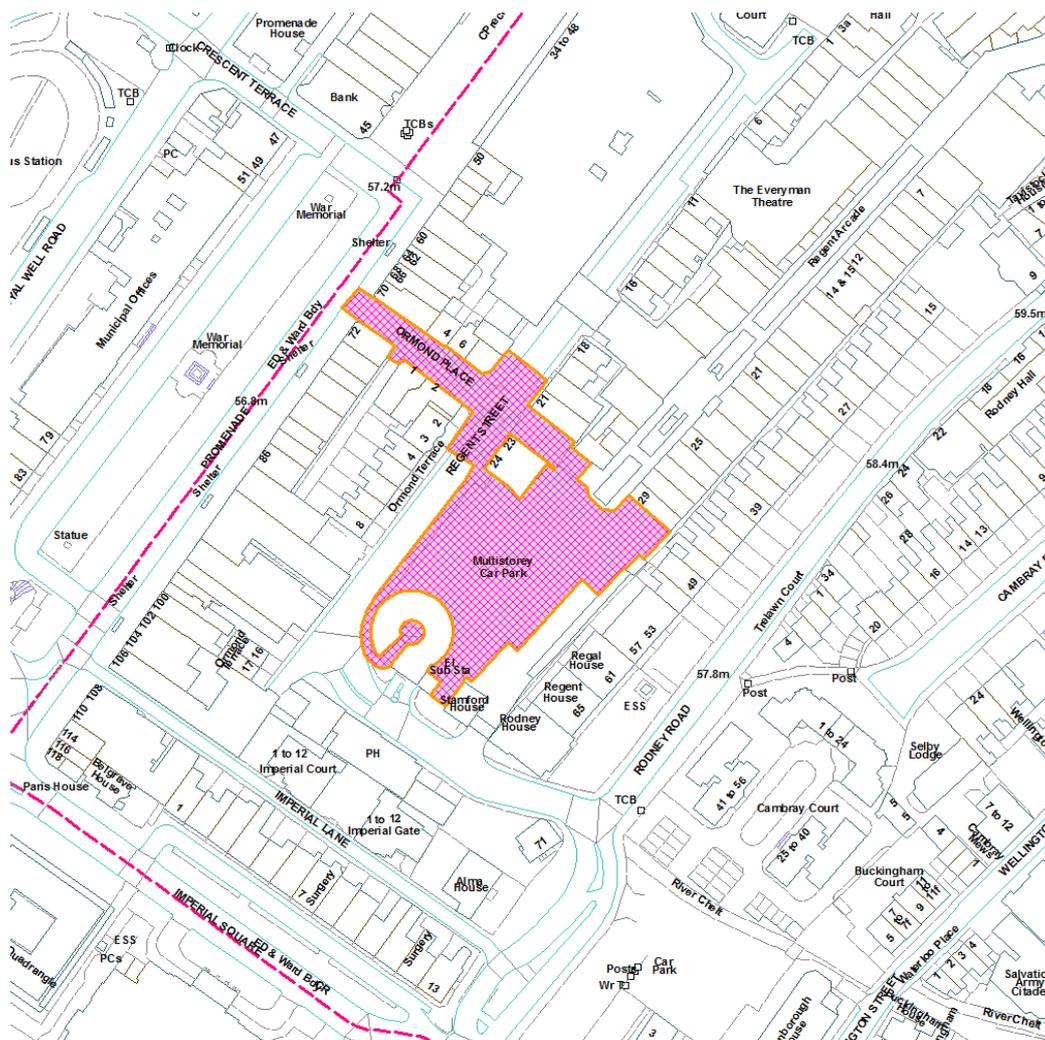


PLANNING
Rec'd 12 OCT 2010
SERVICES

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APPLICATION NO: 18/01630/FUL	OFFICER: Michelle Payne
DATE REGISTERED: 11th August 2018	DATE OF EXPIRY: 6th October 2018
WARD: College	PARISH: n/a
APPLICANT:	The Regent Arcade Trust
AGENT:	Bell Associates Architects Ltd
LOCATION:	Unit 30, Regent Arcade, Regent Street
PROPOSAL:	Alterations to, and conversion of, Unit 30 to create 3no. ground floor restaurants (Class A3), 1no. ground floor retail unit (Class A1), and 1no. basement leisure operation unit (Class D2). Demolition of existing rooftop conservatory and erection of 1no. two storey rooftop restaurant (Class A3) with a new street level entrance from Regent Street. Installation of rooftop plant. New repurposed entrance to the car park with vertical access and new passenger lift. Alterations to the Ormond Place entrance together with works to the public realm along part of Regent Street and Ormond Place to include resurfacing works and raising the carriageway to provide a shared surface for vehicles and pedestrians and installation of associated street furniture.

RECOMMENDATION: Recommendation at Committee



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1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 This application relates to the vacant former BHS store within the Regent Arcade Shopping Centre. Unit 30 provides basement and ground level retail accommodation at the southwestern end of the arcade just inside the Ormond Place entrance and extends across to Regent Street.
- 1.2 The application is seeking planning permission for alterations to, and the conversion of, Unit 30 to create 3no. ground floor restaurants (Class A3), 1no. ground floor retail unit (Class A1), and 1no. leisure operation unit (Class D2) at basement level. As originally submitted, the application proposed 4no. restaurant units but one of these is now proposed to be retained as the retail unit.
- 1.3 The application also proposes the demolition of the existing rooftop conservatory and the creation of a new two storey rooftop restaurant (Class A3) with a street level entrance from Regent Street; the installation of rooftop plant; a new repurposed entrance to the Regent Arcade car park with vertical access and new passenger lift.
- 1.4 Additionally, the proposals include alterations to the Ormond Place Shopping Centre entrance together with works to the public realm along part of Regent Street and Ormond Place to include resurfacing works and the raising the carriageway to provide a shared surface for vehicles and pedestrians and the installation of associated street furniture.
- 1.5 Outline planning consent was recently granted in February 2017 for the conversion of the basement and ground floor of Unit 30 to create 3no. ground floor restaurants (Class A3), 1no. ground floor leisure operation unit (Class D2), 1no. ground floor retail unit (Class A1), and 1no. basement leisure operation unit (Class D2), together with associated pavement works. The application was made in outline with all matters reserved for future consideration except for layout, and simply sought to establish the principle of the change of use.
- 1.6 Planning permission for the upgrading/refurbishment of the existing Regent Street shopping centre entrance together with associated works to the public realm has also been previously granted in 2012 and 2016; however, these permissions have not since been implemented. See relevant planning history below.
- 1.7 The application is before planning committee at the request of Cllr Sudbury *“due to the significant change of use proposed, loss of town centre retail space and for the committee to consider all relevant issues regarding the application in terms of impact of the development on the character and appearance of the area...as this is a significant application a committee decision will be more transparent and enable a public debate on conditions relating to the construction, hours of operation or any other relevant issue that might be of interest to neighbouring residential and business properties”*.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Conservation Area
Core Commercial Area
Flood Zone 2
Flood Zone 3
Central Shopping Area
Smoke Control Order

Relevant Planning History:

12/00660/FUL

28th June 2012

PERMIT

Upgrading/refurbishment of existing shopping centre entrance on Regent Street, including installation of limestone cladding and glazing panel. Resurfacing works to Ormond Place and part of Regent Street, including raising the carriageway to provide shared surface and installation of associated street furniture (including bollards)

16/00944/FUL

28th July 2016

PERMIT

Refurbishment of the existing shopping centre entrance on Regent Street, and the resurfacing, street lighting, street furniture works to the adjacent paved area up to the Regent Street kerb line. Internal alterations to the entrance to create a coffered feature ceiling, Installation of non-illuminated Regent Arcade logo signage letters (Revision to application number 12/00660/FUL)

16/02201/OUT

7th February 2017

PERMIT

Outline application for the conversion of basement and ground floor of Unit 30 to create 3no. ground floor restaurants (Class A3), 1no. ground floor leisure operation unit (Class D2), 1no. retail unit (Class A1), 1no. basement leisure operation unit (Class D2); demolition of existing rooftop conservatory and creation of 1no. rooftop restaurant (Class A3); and associated pavement works

3. POLICIES AND GUIDANCE

Saved Local Plan Policies

CP 3 Sustainable environment
CP 4 Safe and sustainable living
CP 5 Sustainable transport
CP 6 Mixed use development
CP 7 Design

Adopted Joint Core Strategy (JCS) Policies

SD1 Employment - Except Retail Development
SD2 Retail and City / Town Centres
SD4 Design Requirements
SD8 Historic Environment
SD14 Health and Environmental Quality
INF1 Transport Network
INF2 Flood Risk Management
INF3 Green Infrastructure
INF4 Social and Community Infrastructure

Supplementary Planning Guidance/Documents

Shopfront design guide (2007)
Old Town Character Area and Management Plan (2007)
Montpellier Character Area and Management Plan (2007)

National Guidance

National Planning Policy Framework (NPPF)

4. CONSULTATION RESPONSES

Environmental Health

15th August 2018

I have no objection to the proposed development in principal, however I offer the following comments:

The kitchens to all the catering premises will need extraction equipment suitable for the type and volumes of food being produced. I would therefore request a condition is attached requiring details of each unit's extractor system to be submitted for approval before first use of the premises. This is required in order to ensure there is no loss of amenity for other nearby premises due to noise or odours from kitchen extractor plant. Note that this requires the applicant to submit a report predicting the noise levels as they will affect the nearest noise sensitive property. Merely providing the measured levels from a specific system will not be sufficient.

Given the scale of work to this site I must also recommend a condition requiring the developer to produce a scheme for the control of noise, dust and other nuisances from the site during the demolition and construction phases. This is required in order to prevent loss of amenity for users of nearby property. Note that the council's recommended hours of work on such sites are: Monday ' Friday 7:30 ' 18:00, Saturday 8:00 ' 13:00.

Tree Officer

30th August 2018

The Tree Section welcomes this application provided that:

1) The large London Plane tree as marked on the Public Realm Plan (drawing no 247-037-102) is retained and that no works within the tree's Root Protection Area are to be undertaken

2) Given the likely nature of the soil conditions, it is strongly recommended that sufficient new imported soil is incorporated into sufficiently large planting pits. It is also recommended that all new trees are fitted with grilles and guards so as to protect them as they establish and grow into maturity. All such details should be incorporated into a planting plan which shows all tree pit details as well as tree species, size, root type, aftercare and maintenance proposals. No trees should be planted in the planters suggested for Ormond Place.

All such details should be submitted and agreed prior to any work commencing on site.

Ward Councillor

10th September 2018

I am writing as one of the ward councillors for College (unfortunately this website does not offer that option so I have chosen other) which this application falls in I would like to request that this application comes to planning committee for decision rather than being a delegated decision by planning officers. This is due to the significant change of use proposed, loss of town centre retail space and for the committee to consider all relevant issues regarding the application in terms of impact of the development on the character and appearance of the area. I believe as this is a significant application a committee decision will be more transparent and enable a public debate on conditions relating to the construction, hours of operation or any other relevant issue that might be of interest to neighbouring residential and business properties.

Cheltenham Civic Society
10th September 2018

The Planning Forum welcomes the proposed improvements to the lower end of Regent Street.

The Planning Forum is concerned that the proposed street furniture layout in Ormond Place which leaves no space for the florist's stall. The Planning Forum's opinion is that the florist's stall adds variety to the Promenade, and its presence should be encouraged.

Any change to the road surface should be fit for purpose for the weight and volume of traffic which uses Regent Street.

5. PUBLICITY AND REPRESENTATIONS

- 5.1 Letters of notification were sent out to 54 neighbouring premises. In addition, two site notices were posted and an advert published in the Gloucestershire Echo. Two representations have been received in response to the publicity.
- 5.2 The first comment relates to disruption to businesses in Ormond Place, and the second, whilst welcoming the elevational changes and commenting on the new paving, objects as the Promenade Flower seller is not shown on the plans.

6. OFFICER COMMENTS

6.1 Determining issues

6.1.1 The main considerations when determining this application relate to the principle of subdividing the existing retail unit; design and impact on the historic environment; impact on adjacent land users, and highway safety matters.

6.2 Principle

6.2.1 In considering the principle of a change of use, it is acknowledged that the site is located outside of the defined Primary Shopping Frontages and therefore local plan policy RT3, which seeks to control the level of non-A1 uses at ground floor level within Primary Shopping Frontages, is not applicable.

6.2.2 However, the preamble to RT3 is relevant in that it states: *"In defining the 'Primary Shopping Frontages', the Council has had regard to opportunities for the location of non-shopping uses in the town centre, and concluded that adequate scope exists in the non-primary frontages and in those non-A1 premises within primary frontage at present"*. It goes on to specifically refer to Regent Street as one location having been excluded from primary frontage designation despite being *"within the physical heart of the 'Central Shopping Area' as the Council does not consider it appropriate that non-shopping uses should be relegated to the periphery of the centre"*. Setting aside the fact that the building is not currently afforded a shop frontage onto Regent Street, a change of use from A1 to a mixed A1/A3/D2 use in this location must therefore be considered acceptable in principle. The proposed uses are wholly compatible with the wider retail function of the town centre. A smaller retail unit of some 725m² will be retained within the shopping centre.

6.2.3 In addition, it is important to recognise that the principle of the change of use, together with the provision of a roof top restaurant, has been firmly established by the recent grant of outline planning permission.

6.2.4 Moreover, the principle of installing a new entrance to the shopping centre together with associated works to the public realm has been established through the grant of previous planning permissions; albeit the current application proposes a wider scope of works to the public realm than the extant scheme.

6.3 Design and impact on the historic environment

6.3.1 Paragraph 56 of the NPPF states that “*Good design is a key aspect of sustainable development*” and “*is indivisible from good planning*”. Paragraphs 59 and 60 go on to state that design policies should not attempt to impose architectural styles or particular tastes.

6.3.2 Adopted JCS policy SD4 sets out the local design requirements for development proposals and highlights the need for new development to “*respond positively to, and respect the character of, the site and its surroundings*”; the policy reflects the aims and objectives of saved local plan policy CP7.

6.3.3 With particular regard to development within the historic environment, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

New Ormond Place Shopping centre entrance

6.3.4 The existing entrance to the shopping centre is tired and dated in its appearance and as previously noted, the principle of its replacement has been established. The extant planning permission proposed a limestone clad ‘frame’ to the entrance with a large, metal framed, glazed panel set within it over the entrance doors. The entrance was designed so as to ‘announce’ the entrance of the shopping centre whilst not overpowering the small surrounding retail frontages, whilst the glazed panels were designed to give the entrance a feeling of openness, light and scale suitable to the use.

6.3.5 The entrance now proposed is similar in its design approach. As before, a natural stone clad projecting ‘frame’ is proposed with a large, bronze anodised aluminium framed, glazed panel set within it, over new bronze anodised entrance doors; the entrance doors will be relocated to enclose the existing recessed ground floor and provide a flush façade. Internally, a two storey void will be created to create a double height glazed entrance area. LED inserts are proposed with the aluminium frame.

New shopfronts to Regent Street elevation

6.3.6 The recent change of use application was accompanied by floor plans to illustrate how the existing retail floor space would be subdivided, together with indicative external elevations to illustrate the design intent. The proposed external works were welcomed in principle, and were recognised as having the potential to significantly enhance this part of the conservation area.

6.3.7 The existing retail unit has no active frontage onto Regent Street, and the Regent Street façade is an unattractive and overbearing, monotonous feature within the street scene; officers consider that the proposal to open up the façade and introduce an attractive, active street frontage would add visual interest and help to increase the vibrancy and vitality of the locality. This view is shared by the Civic Society who also welcome the proposals.

6.3.8 The existing rendered façade and pilaster detail would be retained with glazed shopfronts and entrances installed within the recessed bays. The materials used in the proposed shopfronts would reflect those proposed to the new shopping centre entrance and comprise natural stone veneer, and bronze anodised aluminium frames and entrance doors. Additional architectural features include projecting bronze anodised aluminium

brise soleils, and perforated champagne coloured aluminium panels in between the proposed signage zones above the entrances. Bi-fold doors to the restaurant seating areas would be fully openable to create terraced areas.

New rooftop restaurant

6.3.9 The principle of erecting a rooftop restaurant has also been previously established, and the indicative external elevations agreed. The restaurant would be located over two levels which are stepped back from the main elevation of the building below to ensure that the visual impact and massing of the restaurant would be reduced from street level. Again, bronze anodised aluminium frames and pilasters are proposed with full height glazing to the Regent Street elevation, and bronze anodised projecting canopies. A roof terrace would be created at the lower level with glazed balustrade.

6.3.10 Access to the rooftop restaurant would be provided from Regent Street via a new glazed entrance feature, with bronze anodised aluminium framing and sliding entrance doors. An existing access staircase will be retained which will also provide access to the car park, and a new lift installed.

New car park entrance

6.3.11 An existing staircase is located within the car park rotunda which is currently used for access and egress out of hours. It is proposed to upgrade this existing stair and provide a new passenger lift to provide access to the car park and rooftop restaurant. Externally, a new fully glazed entrance lobby would be provided.

6.3.12 Overall, it is considered that the contemporary design approach and the palette of external materials proposed would sit comfortably in its surroundings and would significantly enhance this part of the conservation area whilst helping to increase the vibrancy and vitality of the locality. A materials board will be available to view at the committee meeting.

6.4 Impact on the amenity of adjacent land users

6.4.1 Saved local plan policy CP4 advises that development will only be permitted where it will not cause unacceptable harm to the amenity of adjoining land owners or locality; in assessing impact on amenity, the Council will take account of matters including, but not limited to, loss of privacy, and potential disturbance from noise, smells and hours of operation. The policy is consistent with adopted JCS policy SD14.

6.4.2 There are a number of residential units in close proximity to the site. The Environmental Health team has reviewed the proposals and raise no objection subject to a condition being imposed which requires details of each unit's kitchen air extraction system to be submitted and agreed prior to first use of the premises; this is ensure that the kitchen extraction equipment is suitable for the type and volumes of food being produced and to ensure there would be no loss of amenity to nearby premises.

6.4.3 Additionally, in line with the outline planning permission, a condition is recommended which restricts the opening hours to 08:00 to 23:00. Should an end user wish to vary these hours, this can be reviewed at a later date in conjunction with a more detailed application.

6.4.4 Given the glazed nature of the rooftop restaurant it is also considered necessary to impose a condition which would require the submission of a detailed lighting scheme for this unit; as without proper mitigation the lighting design could have an unacceptable impact upon the locality.

6.5 Other matters

6.5.1 The site is located within Flood Zones 2 and 3. The Environment Agency (EA) previously did not object to the material change of use proposed but referred the Council to their Flood Risk Standing Advice. In terms of flood risk, both the existing and proposed uses are classed as 'less vulnerable' and therefore development is appropriate, as per the EA's 'Flood risk vulnerability and flood zone 'compatibility'' (Table 3).

7. CONCLUSION AND RECOMMENDATION

- 7.1 The site is located outside of the defined Primary Shopping Frontages and therefore local plan policy RT3, which seeks to control the level of non-A1 uses at ground floor level within Primary Shopping Frontages, is not applicable. Notwithstanding this, the preamble to the policy is relevant as it specifically refers to Regent Street as one location having been excluded from primary frontage designation despite being "within the physical heart of the 'Central Shopping Area' as the Council does not consider it appropriate that non-shopping uses should be relegated to the periphery of the centre". As such, a change of use from A1 to a mixed A1/A3/D2 use in this location must be considered acceptable in principle. The proposed uses are wholly compatible with the wider retail function of the town centre. A retail unit of some 725m² will be retained within the shopping centre. It is also important to recognise that the principle of the change of use, together with the provision of a roof top restaurant, has been firmly established by the recent grant of outline planning permission.
- 7.2 Officers consider the contemporary design approach and the palette of external materials proposed in the structural changes to the building would significantly enhance this part of the conservation area whilst helping to increase the vibrancy and vitality of the locality; and would sit comfortably in their context.
- 7.3 The external changes to the buildings and the mix of uses proposed are therefore considered to be acceptable and supported by officers; however, responses from the Townscape Team and the Local Highways Authority are still awaited in respect of the works to the public realm; it is anticipated that these will be available to circulate in an update, together with the officer recommendation.

APPLICATION NO: 18/01630/FUL	OFFICER: Miss Michelle Payne
DATE REGISTERED: 11th August 2018	DATE OF EXPIRY : 6th October 2018
WARD: College	PARISH:
APPLICANT:	The Regent Arcade Trust
LOCATION:	Unit 30, Regent Arcade, Regent Street
PROPOSAL:	Alterations to, and conversion of, Unit 30 to create 4no. ground floor restaurants (Class A3) and 1no. leisure operation unit (Class D2). Demolition of existing rooftop conservatory and erection of 1no. two storey rooftop restaurant (Class A3) with a new street level entrance from Regent Street. Installation of rooftop plant. New repurposed entrance to the car park with vertical access and new passenger lift. Alterations to the Ormond Place entrance together with works to the public realm along part of Regent Street and Ormond Place to include resurfacing works and raising the carriageway to provide a shared surface for vehicles and pedestrians and installation of associated street furniture.

REPRESENTATIONS

Number of contributors	2
Number of objections	2
Number of representations	0
Number of supporting	0

97 Denman Avenue
Cheltenham
Gloucestershire
GL50 4GF

Comments: 12th September 2018

The elevational changes to the bottom end of Regent Street look most attractive and I welcome them. (How all these new restaurants will survive is another matter!) Whilst the new paving to Ormond Place looks quite attractive, I do wonder if it will be suitable for vehicular traffic as well as pedestrian. Most importantly - and the reason why I object - is that the plan of Ormond Place shows no indication of the Promenade flower seller - a well established trader of many years and part of the varied offer that the Prom makes.

5 Ormond Place
Cheltenham
Gloucestershire
GL50 1JD

Comments: 3rd September 2018

I own a business on Ormond Place. The works to be carried out to the Ormond Place entrance will likely cause an obstruction to customers entering my business. I need to know how this will affect access to us. And if the view of my business will be obstructed to Regent Street. I am hoping any works will be undertaken with minimal affect to my business and Id like to know how you plan to protect my business from these disruptions.

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From: [REDACTED]
Sent: 10/10/18
Subject: Regent Arcade Unit 30, Ormond Place and Public Realm Application

Dear Councillors

Re: Regent Arcade Unit 30, Ormond Place and Public Realm Application

I am emailing you (with a copy to the Chairman of the Planning Committee Garth Barnes, Planning Officer Michelle Payne and Committee Clerk Judith Baker) to give you more background information regarding our planning application which is due to be considered at your meeting on Thursday 18 October 2018. Outline consent has already been granted for the redevelopment so detailed consent is sort.

Attached is a report by retail expert James Merrett, a Partner at Cushman and Wakefield, summarising the current position regarding UK retailing in general and more specifically the situation prevailing in Cheltenham.

With regard to the public and consultee comments received regarding this application I provide our response to each in turn below.

If you have any further questions regarding the application I will be happy to answer them.

Regards

Scott Lahive
Centre Manager

Carrying out the Works

Comment: I own a business on Ormond Place. The works to be carried out to the Ormond Place entrance will likely cause an obstruction to customers entering my business. I need to know how this will affect access to us. And if the view of my business will be obstructed to Regent Street. I am hoping any works will be undertaken with minimal affect to my business and I'd like to know how you plan to protect my business from these disruptions.

Regent Arcade Comments:

We pride ourselves on being a considerate neighbour and have a proven track record of carrying out even the most major works with minimal disruption and inconvenience. Access to the shopping centre and neighbouring units on Ormond Place will be protected during trading hours. We will consult with all neighbours before commencing, everyone will be made aware of the schedule of works and kept up to date throughout the project.

Protecting Locations and Pitches for Street Trading

1st Comment: The elevational changes to the bottom end of Regent Street look most attractive and I welcome them. (How all these new restaurants will survive is another matter!) Whilst the new paving to Ormond Place looks quite attractive, I do wonder if it will be suitable for vehicular traffic as well as pedestrian. Most importantly - and the reason why I object - is that the plan of Ormond Place shows no indication of the Promenade flower seller - a well-established trader of many years and part of the varied offer that the Prom makes.

2nd Comment: The Planning Forum welcomes the proposed improvements to the lower end of Regent Street. The Planning Forum is concerned that the proposed street furniture layout in Ormond Place which leaves no space for the florist's stall. The Planning Forum's opinion is that the florist's stall adds variety to the Promenade, and its presence should be encouraged.

Regent Arcade Comments:

The flower seller was recently granted a new licence to trade from the junction of Ormond Place and The Promenade and we respect this decision. The location of street furniture was for indicative purposes only therefore the placing of such items can and will be adjusted to ensure they do not impact on adjacent retailers and street traders.

Ward Councillor Concerns

Comment: I am writing as one of the ward councillors for College (unfortunately this website does not offer that option so I have chosen other) which this application falls in I would like to request that this application comes to planning committee for decision rather than being a delegated decision by planning officers. This is due to the significant change of use proposed, loss of town centre retail space and for the committee to consider all relevant issues regarding the application in terms of impact of the development on the character and appearance of the area. I believe as this is a significant application a committee decision will be more transparent and enable a public debate on conditions relating to the construction, hours of operation or any other relevant issue that might be of interest to neighbouring residential and business properties.

Regent Arcade Comments:

The Regent Arcade is a major employer and financial contributor in College Ward and as such we would expect our ward councillor to have engaged with us at the outline planning stage when the masterplan was agreed and before planning permission was granted. We hope our democratic representatives would wish to support the regeneration of the core town centre and repurposing of vacant space to establish Regent Street as the town's cultural quarter.

1. Loss of retail

(Please refer to the attached Cushman and Wakefield report). Demand for retail space has fallen significantly and shows no sign of improving. The number of vacant units in the town and indeed nationally has increased as customers find more convenient ways of shopping online and out of town. A local case in point worth noting in the Promenade which now has a number of empty shops; whereas the town's flagship retail destination once had a waiting list of retailers wanting to occupy space. Nationally over 60% of former BHS stores remain empty. The former BHS space has been marketed since 2016 and there is no retailer in the market place to take such a large amount of space in what is deemed a more secondary retail location. The proposed plan gives Cheltenham the opportunity not to be another statistic and continue to be a regional draw for shopping and leisure creating numerous jobs in the process. Repurposing what would otherwise remain as redundant space into a mixed-use development with a diverse offer will in turn encourage more shoppers to come to town and increase dwell time.

2. Character and appearance

The current Regent Street elevation of the former BHS is large, blank and unappealing, so the character and appearance of Regent Street will be improved by this development thanks to the introduction of active open frontages and an improved public realm. The façade will deliver vibrancy and vitality to an otherwise negative and utilitarian section of Regent Street. One of our neighbours Andrew Leeke of Pinkerton Leeke & Co (7-8 Ormond Terrace Regent Street) whose offices face the proposed development has said: *"I have looked at the blank wall opposite my office since it (the Regent Arcade) was built and the prospect of some life and movement across there is a great relief."*

3. Hours of operation

The A3 restaurant units directly accessed from Regent Street. The environment will be similar to that of Gloucester Quays, so occupiers will be responsible operators of family friendly venues. The prospect of plugging the current time gap between when the shops close and late-night venues open will enhance Regent Street and create a vibrant all-day destination. It will help reinvigorate the current offer and further attract a different customer demographic to that of the nightclubs further down Regent Street, thus creating an environment suitable for all ages. The proposed development will close earlier than existing venues adjacent to it:

- To the left of the development is 21 club which is licenced to 3am
- Opposite is office space empty in the evening and a late-night bar (Lily Gins) open until 2am
- To the right of the proposed development there are 2 night clubs (Moo Moo's and Fever) which are open until 4am.

I would therefore like to reiterate that the proposed hours of operation are well within the timeframes where consent has been granted for our neighbours.

4. Effect on neighbours and residents

There are no residential properties in the immediate vicinity of the scheme. The proposed development is in an area that is currently biased towards late night venues and as such already has an established evening economy. We believe the introduction of restaurants will encourage better behaviours and improve the overall customer offer. We have been working with our neighbours to shape the scheme. In the case of Everyman Theatre, the proposed development will deliver a safe well-lit passage to the car park for their visitors, with direct lift access for the first time as the shopping centre will remain open into the evening. The Everyman has long had a requirement to improve access to the car park for guests with mobility issues. This is just one example of how the development will benefit our neighbours.

Arboreal Issues - Comment: (Tree Officer)

The Tree Section welcomes this application provided that: The large London Plane tree as marked on the Public Realm Plan (drawing no 247-037-102) is retained and that no works within the tree's Root Protection Area are to be undertaken. Given the likely nature of the soil conditions, it is strongly recommended that sufficient new imported soil is incorporated into sufficiently large planting pits. It is also recommended that all new trees are fitted with grilles and guards so as to protect them as they establish and grow into maturity. All such details should be incorporated into a planting plan which shows all tree pit details as well as tree species, size, root type, aftercare and maintenance proposals. No trees should be planted in the planters suggested for Ormond Place. All such details should be submitted and agreed prior to any work commencing on site.

Regent Arcade Comments:

All noted. The Plane tree is an important feature of the area and we will take great care not to disturb its roots. We will ensure any new planting will benefit from improved soil.

Environmental Issues - Comment (Environmental Health)

I have no objection to the proposed development in principal, however I offer the following comments:

The kitchens to all the catering premises will need extraction equipment suitable for the type and volumes of food being produced. I would therefore request a condition is attached requiring details of each unit's extractor system to be submitted for approval before first use of the premises. This is required in order to ensure there is no loss of amenity for other nearby premises due to noise or odours from kitchen extractor plant. Note that this requires the applicant to submit a report predicting the noise levels as they will affect the nearest noise sensitive property. Merely providing the measured levels from a specific system will not be sufficient.

Given the scale of work to this site I must also recommend a condition requiring the developer to produce a scheme for the control of noise, dust and other nuisances from the site during the demolition and construction phases. This is required in order to prevent loss of amenity for users of nearby property. Note that the council's recommended hours of work on such sites are: Monday ' Friday 7:30 ' 18:00, Saturday 8:00 ' 13:00.

Regent Arcade Comments:

We have developed an excellent working relationship with Environmental Health during the four previous phases of the Regent Arcade's redevelopment. As with all works we have undertaken, all units will feature adequate ventilation and be in accordance with legislation and building regulation requirements. All plant will be located within the shopping centre's existing service yard and designated plant area both of which are screened from neighbouring properties. They do not cause any noise disturbance and are unlikely to do so given their concealed locations, however this will be taken into account.



Cushman & Wakefield
 43-45 Portman Square
 London
 W1H 6LY

Planning Committee Members
 Cheltenham Borough Council
 Municipal Offices
 Promenade
 Cheltenham
 GL50 9SA



By email

Our Ref: JM/Cheltenham

16 October 2018

CHELTENHAM – UNIT 30 REGENT ARCADE

Introduction

Cushman and Wakefield are together with KBW Chartered Surveyors instructed by The Regent Arcade Trust as the joint leasing advisor of the Regent Arcade Shopping Centre, Cheltenham.

This report is written to support the conversion of Unit 30, formerly occupied by BHS, at Regent Arcade from a single large retail unit into multiple new A1, A3 and D2 units. The aim is to provide sustainable provision of accommodation that meets market demands and to ensure that Regent Arcade continues to contribute to a vibrant town centre.

Background

Cushman & Wakefield (C&W) is one of the world's leading global commercial real estate services providers with 400 offices in 70 countries and over 48,000 employees. In the UK, the firm has one of the largest and strongest dedicated retail teams employing over 80 professionals across a national network of regional offices in Scotland, the North and the Midlands as well as our headquarters and City office, in London.

In the UK C&W are advising on over 100 shopping centres, active on over 300 high streets and involved in more than 6 million sq ft of retail parks. In addition, C&W have an enviable list of retailer mandates ranging from luxury brands such as Gucci and JP Tod's to the value sector including Deichmann, Select and Dunelm.

Cushman & Wakefield have been leasing agents on Regent Arcade for more than 8 years. KBW Chartered Surveyors are the joint agents on Regent Arcade and are a leading independent practice of Chartered Surveyors, offering a personal commercial agency and property consultant service throughout Gloucestershire and surrounding counties. KBW have considerable experience in the letting of shopping centre units in the area and have acted as leasing agents in respect of Regent



Arcade for more than 10 years.

National Retail Commentary

The traditional retail and leisure markets in smaller towns and cities (i.e. outside the Top 20 retail destinations) are being directly challenged by technological changes and the emergence of multi-channel retailing.

These factors have resulted in consumers shopping in greater volume and frequency via digital channels at the expense of visiting physical shops. At the same time discretionary spend has been put under pressure by inflation rising faster than wage growth.

Shopping as an activity can now be done from any location and a physical presence is not a necessity for consumers. This has placed a greater emphasis on the need for town centres that offer more than just retail in order to drive footfall.

Many retailers are as confused as every other industry as to what the numerous vague Brexit scenarios might mean for their businesses going forward, and this means that the easiest decision to make is to not do anything too dramatic.

Rationalisation continues across most segments of the retail market, with limited store openings underway or planned. Where retailers are expanding or consolidating into new stores they are finding landlords are becoming increasingly flexible on rents and terms, and this is expected to remain the tone of the market for the foreseeable future.

2018 has been as challenging as 2017 and retailers remain cautious and are looking to cut costs. There has been a well-publicised rise in CVAs and administrations. The dividing lines between online and 'bricks & mortar' continue to blur.

Marketing of Unit 30 Regent Arcade

The following commentary details the current state of the UK large space retail occupier market:

- The Local Data Company have recently confirmed over half of the once 160 strong BHS estate are lying vacant on a UK wide basis. BHS went into Administration in April 2016.
- Further supply of large retailing space on a national basis is likely to be realised following the recent CVA and administration of House of Fraser. Whilst Sports Direct have bought the House of Fraser stores, stock and brand names there is uncertainty over which stores will be retained longer term and what Sports Direct can do differently to turn around the fortunes of this failed department store.
- There is also continued speculation over the short-term prospects of Debenhams. Debenhams has brought in advisers from KPMG to assess a number of options to improve the fortunes of the department store chain. It is in the midst of a turnaround plan designed to cut costs and boost sales. We understand KPMG are reviewing a number of potential options, including a CVA, but it is just one possible measure under consideration.
- Marks & Spencer have also announced the closure of 100 stores by 2022, accelerating a



reorganisation that it says is 'vital' for the retailer's future. Of the 100 stores, 21 have already been shut and M&S has recently revealed the location of 14 further sites due to close.

The Joint Agents have undertaken a thorough targeted marketing campaign focusing on large space occupiers since Q2 2016 to lease the premises and it is apparent there is no A1 occupier in the market either on a local or national basis who has a requirement for the unit.

The consensus of occupier feedback is that retailers either have no requirement for Cheltenham or the location of the premises is considered to be in a secondary retailing pitch at the end of the mall with poor sightlines and lacking visibility. Whilst there is the potential to increase the unit's visibility on to Regent Street through the introduction of new glazing panels it has not proved compelling enough to attract retailers to this location.

Conclusion

There is no retailer interest for the former BHS unit.

The proposals do however have the opportunity to create an enjoyable retailing experience combining a mixture of retail, restaurants and leisure activities to create an all-day and evening attraction which will appeal to the Cheltenham customer and wider catchment to enhance Regent Arcade and the town centre provision.

There are structural changes in the retail sector that mean locations that are heavily dependent on retail need to evolve to ensure their future vitality. With this in mind, Landlords are continuing to actively manage their assets to add to the mix of uses, including through increased leisure operations and hotel and residential development.

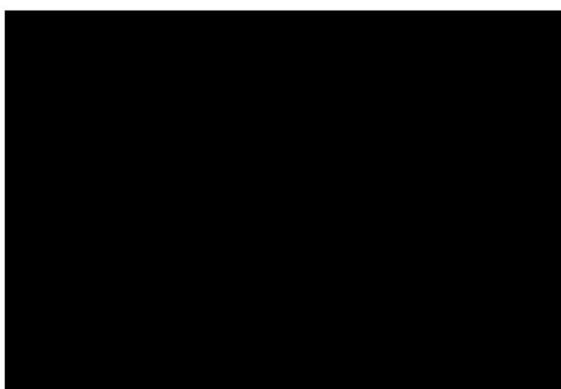
Town centres have always been about much more than retail. They are places at the heart of our communities where people live, work and play. Leisure and food and beverage operations have dramatically risen over the last decade and the UK is very much part of the burgeoning café culture – these are all positive uses that play a key role in attracting people to our town centres through the day and into the evening.

In light of the above commentary we fully support The Regent Arcade Trust's proposals.

If you require any further information, please do not hesitate to contact either Richard Knightley or I.

Kind regards

Yours sincerely



CC Michelle Payne Judith Baker

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APPLICATION NO: 18/01770/FUL & LBC	OFFICER: Mr Ben Hawkes
DATE REGISTERED: 1st September 2018	DATE OF EXPIRY: 27th October 2018
WARD: St Peters	PARISH:
APPLICANT: Ms Catherine Crowley	
AGENT:	
LOCATION: St Marys Mission, High Street, Cheltenham	
PROPOSAL:	Installation of a roof mounted flagpole to the front elevation of St Marys Mission to display the recently awarded 2018 Green Flag for Winston Churchill Memorial Garden

RECOMMENDATION: Permit & Grant



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1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site relates to the Grade II listed building known as 'St Mary's Mission', located within the grounds of the 'Winston Churchill Memorial Garden'. The site is accessed via The High Street and is within Cheltenham's Central Conservation Area.
- 1.2 The applicant is seeking planning permission and listed building consent for the installation of a roof mounted flag pole and flag to the front elevation of the building.
- 1.3 The application is at planning committee as Cheltenham Borough Council is the applicant.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport Safeguarding over 45m
Conservation Area
Core Commercial Area
Honeybourne Line
Listed Buildings Grade 2
Residents Associations
Lower High Street Shopping Area
Smoke Control Order

Relevant Planning History:

07/00846/LBC 26th September 2007 GRANT

Remedial repair works to include new render coat to upper west elevation and installation of bird guarding/proofing systems to front elevation

3. POLICIES AND GUIDANCE

Saved Local Plan Policies

CP 4 Safe and sustainable living
CP 7 Design
BE 17 Advertisements and signs on listed buildings

Adopted Joint Core Strategy Policies

SD4 Design Requirements
SD8 Historic Environment
SD14 Health and Environmental Quality

Supplementary Planning Guidance/Documents

Central conservation area: Lower High Street Character Area and Management Plan (July 2008)

National Guidance

National Planning Policy Framework

4. CONSULTATIONS

The application has been discussed with the Council's Conservation Officer.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	0
Total comments received	0
Number of objections	0
Number of supporting	0
General comment	0

- 5.1** The application was advertised by way of a site notice and an advert published in the Gloucestershire Echo. No letters of representation have been received from the public.
- 5.2** A letter of support has been received from a local ward councillor, the comments are below:

As a ward councillor, I would like to fully support this proposal. The volunteers and council officers who have worked tirelessly to get Winston Churchill Memorial Gardens (WCMG) deserve to have their achievement of being awarded a Green Flag recognised. Flying the flag from St Mary's Mission, is a great way to recognise and celebrate this accolade, and I would personally add my congratulations and thanks to all those who participated in this success.

I note that St Mary's Mission is a listed building, and that it is important to ensure that any proposed modifications are appropriate. In light of the setting and architecture of the building it is my opinion that a flag pole would be in keeping.

6. OFFICER COMMENTS

- 6.1** The main considerations of this application are the principle of the works, impact on the listed building and surrounding conservation area and impact on neighbouring amenity.
- 6.2** The flag to be displayed is to promote a 'Green Flag Award' that has recently been awarded to the 'Winston Churchill Memorial Garden'. The award recognises parks and open spaces that fulfil a number of criteria including design, biodiversity, sustainability, community involvement and visitor experience. This award has previously been awarded and a similar pole and flag was mounted on the building between 1998 and 2002, photos of this have been included in this application.
- 6.3** The application has been discussed with the council's conservation officer; who has been in discussions with the applicant prior to the submission of this formal application. No objection is raised.
- 6.4** Officers consider the scale form and location of the flag pole and flag to be appropriate for its location. It is not considered that the development will result in any unacceptable loss of historic fabric or harm to the character of the conservation area. The conservation officer considers that the mounting of a flag in this position will increase the presence of the building and the park, especially from the High Street. Increasing the presence of the building will in turn attract members of the public to the site and will therefore be of public benefit.
- 6.5** The proposed flag pole and flag will not result in any unacceptable impact on neighbouring amenity or have any unacceptable impact on surrounding visual amenities.
- 6.6** The proposal is considered to be compliant with local plan policies CP4, CP7, BE17 and adopted JCS policies SD4, SD8 and SD14.

7. CONCLUSION AND RECOMMENDATION

- 7.1 Having considered all of the above, officer recommendation is that planning and listed building consent should be granted, subject to the conditions set out below:

8. CONDITIONS / INFORMATIVES

18/01770/FUL:

- 1 The listed building consent hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

18/01770/LBC:

- 1 The listed building consent hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The listed building consent hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

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APPLICATION NO: 18/01770/FUL		OFFICER: Mr Ben Hawkes	
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ADDITIONAL REPRESENTATION

97 Denman Avenue
 Cheltenham
 Gloucestershire
 GL50 4GF

Comments: 15th October 2018

I am one of the volunteers who helped to secure the Green Flag Award, so this issue is close to my heart. However, I also feel that the High Street elevation of this little chapel is one of the most beautiful classical facades in Cheltenham. I do not think that being "adorned" with a flag - however worthy the flag might be - is at all appropriate.

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