

Response Report - Civic Pride North Place & Portland Street Development Brief Comments & Recommendations

Preface

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
LB	My 86 yr old Nana lives at Dowty House. Although mention is made in the DPD of Dowty House - very little further mention is made. Given that the premises is occupied by elderly & infirm residents, & given that they already suffer considerable noise intrusion since the building of the car park & brewery complex - I believe that the DPD should make considerably more provision & mandatory requirements for any developer within the infrastructure delivery planning to ensure minimal impact on Dowty House & its residents. Please consider this matter fully.	As above - requirements for developers to present proposals for ensuring quality of life & work for residents & staff at Dowty House	Agree.	Add new paragraph 5.3 <u>"Any planning consent will be accompanied by a condition restricting hours of working and access arrangements during construction in areas close to residential properties in order to protect residential amenity."</u>	1
Rachael Bust (The Coal Authority)	No comment.		Noted	No Change	13
Stephen Bareham	We would like to offer our support and participation in this process and suggest that a representative of the congregation be included in some way at key points in the process going forward.		Noted	No change	27

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Wm Morrison Supermarkets Plc	Generally welcome revised approach.		Noted	No change	56

Background

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Jeremy Williamson	Para 1.4 amend "on" to build "upon" the regency heritage		Agree	Para 1.4 Amend to read "...project is to build <u>upon</u> the regency heritage ..."	61

Changing Circumstances

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Simon Steele-Perkins (Strategic	It is stated in the documents that specialist property advisors have questioned the deliverability of the 2008 development brief. There is no evidence however that the revised proposals incorporated within the draft		Evidence of the on the question of deliverability is provided in a letter to	No change.	20

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Land Partnerships)	documentation are deliverable either. In particular the requirement for 40% affordable housing where there is currently no Homes and Communities Agency grant funding available will render this site unviable, secondly the removal of the requirement for a substantial commercial office building on the site will remove the opportunity for a pre-let anchor tenant which could have provided funding for much of the development.		<p>the Council from s advisers GVA Grimley dated 1st June 2010. Its detailed contents are confidential. However it concludes: "...I have concerns thatthe development Brief adopted in July 2008 is not deliverable in its current format but that by compromising the thrust of the brief to a more commercial solution many of the other ambitions could ell be realised."</p> <p>The requirement for 40% affordable housing on the site is a Development Plan requirement and must be the objective of the Council for this site given the finding of the Housing Needs Survey (2009). The issue of Home and Communities Agency funding is a matter of negotiation</p> <p>The Brief does not remove the need for a "substantial commercial office building". It is drafted in a manner which would allow such a proposal to come forward and specifically states</p>		

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			(1.7d) that speculative office development, although a limited opportunity, is not ruled out.		
Simon Steele-Perkins (Strategic Land Partnerships)	There remain various other obstacles to the successful delivery of this site, all of which were discussed at Public Inquiry in Cheltenham 2 years ago including land ownership, development costs, delivery timetable, availability of funding, requirement for off-site infrastructure and technical issues associated with underground car parking.		Many of these issues are challenges, rather than obstacles. The brief has been redrafted in part to offer opportunities to address some of them. Ground investigation work over the past 2 years suggests that underground parking may be an option.	No Change	22
Jeremy Williamson	Para 1.7 d ensure ties in with para 3.37 of SPD - Words such as residential and commercial should be followed by clarifying comments eg (including 40% affordable) and (potentially office, retail etc).		Comment noted. Amend para 1.7d to give examples of potential uses.	Amend para 1.7d by adding the following sentence " <u>Consequently, the Brief introduces opportunities for a wider range of commercial development on the site (e.g. office, retail etc.) along with a range of</u>	62

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
				<u>other potential uses.</u> "	

Main Objectives

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
wraith	1.10 g ii - Greening The Promenade: agree		Noted	No change as a result of this comment.	14
Stephen Bareham	We are pleased to see that one of your primary objectives for this project is to "create a series of high quality public spaces which enhance the setting of Holy Trinity Church" and that this framework appears sensitive to the important position of Trinity as part of the local community. We are encouraged by the inclusion of public spaces and the suggestion that Trinity Church with its social and community interest would be an integral focal point. We would very much like to be involved with the development of this concept and ensure that our own aspirations for		Noted	No change.	25

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	development and expansion are aligned with the potential of this project.				
Stephen Clarke (Cheltenham Civic Society)	Cheltenham Civic Society welcomes in general the revision to the brief for North Place and Portland Street and sees it as an improvement to the original. We believe that the key features of the scheme must be the establishment of a green corridor connecting Pittville with the centre of the town, improvements to St Margaret's Road with improved crossings and improved streetscape, and recognition of existing architectural features. This requirement should be more clearly defined within the brief and within the main objectives. The requirement for high quality sustainable contemporary architecture in these areas, complementary to the existing Regency style of the town, is clearly stated as a key feature of the whole scheme.	We believe that the key features of the scheme must be the establishment of a green corridor connecting Pittville with the centre of the town, improvements to St Margarets Road with improved crossings and improved streetscape, and recognition of existing architectural features. This requirement should be more clearly defined within the brief and within the main objectives.	Agree	<p>Amend 1.10d by deleting existing and replacing with "<u>Delivers series of spaces on St Margaret's Road which improve pedestrian movements and streetscene and creates a vibrant, safe street.</u>"</p> <p>Amend 1.10g ii by deleting existing and replacing with "<u>establish a green corridor linking the town's two historic promenades (The Promenade and Pittville Park).</u>"</p> <p>Add new 1.10h "<u>Preserves and</u></p>	5

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
				<u>enhances the existing historic architecture.</u> "	
Stephen Clarke (Cheltenham Civic Society)	Portland Street is the historical connection between Pittville and the town and the northern approach to the town. We suggest that the emphasis for Portland Street is as a green avenue with 2-way traffic, a wide pedestrian tree-lined pavement and a distinct cycle path with some planting beds and space for public art, making Portland Street into a northern "Promenade". We feel that the pictures in the SPD do not represent our aspirations for a largely residential street. The style should as far as is possible be continued into St Margaret's Road. We feel that building to 5 storeys is only acceptable where the street is wide, in proportion to the height.		<p>Comments noted.</p> <p>There is no reason why enhancements should not include the greening of Portland Street. However, this should not negate the desire to improve North Street/North Place - which is a direct northern axial extension of the Promenade - with views to the scarp. It is a long-established objective in the Civic Pride Urban Design Framework which had support through the project's consultation.</p> <p>Notwithsatnding this, the vision of Portland Street</p>	<p>Amend para 2.15(i) to read: "There is a further opportunity to provide strong active building frontages and space along St.Margaret's Road and Portland Street, <u>either of which could be developed as boulevards or tree-lined avenues.</u>"</p> <p>Amend para 2.15(k) to by adding the following: "<u>Subject to traffic modelling, Portland Street may also have the potential for a radical reconsideration of</u></p>	7

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>as a residential-lined, 2-way, green avenue is an attractive proposition. It will need additional work through the traffic model but should not be lost in the Brief as an opportunity.</p> <p>Agree with comment that 5-storey development should only be accommodated where the street is wide enough.</p>	<p><u>traffic management arrangements, such as 2-way working, which coupled with streetscene enhancements may help to create significant improvements in movement, activity and character.</u></p> <p>Amend Design Principle E (Streets and Spaces) (g) by the addition of the following sentence <u>"Portland Street could be similarly improved by better landscape, traffic management and enclosure by buildings and uses which humanise and vitalise it."</u></p>	

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Stephen Clarke (Cheltenham Civic Society)	We welcome the requirement for public space and would particularly support this for the green corridor rather than just a square emphasising Holy Trinity Church. Public space would obviously be a good candidate for underground public parking.		Noted.	No change	9

Planning

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Jeremy Williamson	Para 2.3 slightly confusing - is it 40 or 50%		Amend para 2.3 to make clear that the affordable housing requirement on the site is 40%.	Amend the end of Para 2.3 to read: "...The overarching housing issue to address on the site is the delivery of affordable housing. The Council now considers this is best reflected in Policy HS 4 a generic housing policy which requires a <u>minimum of 40% affordable housing and it will be seeking this level of provision through the development of the site.</u> "	63

Land Ownership

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Jeremy Williamson	Para 2.6 amend land ownership to reflect GCC ownership		Land at Warwick Place in GCC ownership is to be included in the site are of the Brief.	Amend Plan 2 to include land in GCC ownership at Warwick Place within the Brief.	64

Flood Risk

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Margareta Mojziso	The proposed change in land use would have no impact on the delivery of the site. Our previous comments for the SPD remain the same as those already outlined in our previous letter and we have no objection to the proposed changes within the revised SPD.		Noted	No change.	60

Analysis

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
James Dorer	Following discussions with the Borough Council, Gloucestershire County Council hereby agrees and represents that the land shown on the attached plan (at Warwick Place) should henceforth be included in		Agreed	Amend Plan 2 to identify GCC land at	12

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	the red line defining the redevelopment area shown on Plan 2: Analysis and Opportunities in the above document.			Warwick Place as being within the Development Brief boundary.	
Simon Steele-Perkins (Strategic Land Partnerships)	Several of the desire lines etc shown on the development principles plan cross land in third party ownership.		The desire lines are intended to be indicative. Agree that one does appear cross third-party land.	Amend Plan 2 so that the main "pedestrian access" line across the site is contained within the boundary of the Brief.	24

Opportunities

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Text should be amended to include the requirements of Crime Prevention and increase	Amend 2.15b to read "The site is in a strategically important location on the edge of Cheltenham's town centre on two major routes. It provides a key opportunity to form a new northern gateway to the town centre.	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to	Add new paragraph (h) to Design Principle C "Design Quality" to read: " <u>The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant.</u>	28

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	the need for Designing Out Crime.	Redevelopment of this site also provides an excellent opportunity to expand the core of the town centre, by creating a new focus for the town north of the High Street which offering a safer environment with good natural surveillance, street lighting appropriate routes for increased pedestrian movement."	include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	<u>They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</u>	
Mark Murphy (Gloucestershire Constabulary)	Amend text to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend 2.15fi to read "Public car park for about 300 cars which promote safety and security " there is an opportunity to consider placing parking underground as one of a number of options."	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary.	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet	29

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".</p>	<p>Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</p>	
<p>Mark Murphy (Gloucestershire Constabulary)</p>	<p>Amend text to include the requirements of Crime Prevention and increase the need for Designing Out Crime.</p>	<p>Amend 2.15hii to read "provides high quality public spaces demonstrating Crime Prevention through Environmental Design (CPTED), considerate pedestrian movement and various options of security"</p>	<p>Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should</p>	<p>Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate,</p>	<p>30</p>

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			remain but be backed by a general statement in Design Principle C - "Design Quality".	incorporate the requirements of Counter Terrorism mitigation."	
Wm Morrison Supermarkets Plc	Para 2.15f(ii) - clarify that the Brief is not only looking for B1 uses and that other employment generating uses such as retail will be acceptable.	Alter "employment" to "employment-generating".	Agreed	Amend Para 2.15f(ii) to refer to " <u>employment-generating uses</u> ".	57
Wm Morrison Supermarkets Plc	Morrison's consider convenience retail to be a suitable development for the site.	Para 2.15f - amend to indicate that this is not an exhaustive list of potential uses.	Agree	Amend 2.15f delete "including"; add " <u>the following uses are required on the site, other uses may be appropriate where they contribute to the objectives of the brief:</u> "	58

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Jeremy Williamson	Box 2.15 k Typo		Correct typo.	Amend Para 2.15 (part) to read: "... and to enhance the road corridor in St Margaret's Road...	66

Land Use

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
wraith	Portland St/North Place: Too many shops and cafes already in the town. Repeating the Brewery a mistake as it is struggling already.		The Brief has been drafted to not exclude the potential for uses such as retail, rather than specifically promote them. Any retail proposal will be subject to normal checks and balances, including an assessment of its relationship to other uses. The right proposal in this location could have positive impacts on the Brewery.	No change	16
wraith	3.2 a - Too many flats near town centre already.		The Council considers that a mixed use scheme which includes an element of residential use will create a vibrant and safe development on this important edge of centre site. The brief does not specify flats and Para 2.15fi states that the type	No change.	17

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			of housing will reflect the requirements of the 2009 Housing Needs Study.		
Simon Steele-Perkins (Strategic Land Partnerships)	Given the extreme shortage of employment land in and around Cheltenham it is critical that this site is not simply developed for some low density housing with an attractive environment. This would appear to be the only likely consequence of the flexibility which has been built into the revised development brief. Creating and maintaining employment (in the form of		Agree with comment that "Creating and maintaining employment ... facilities on this important town centre site must be an essential pre-requisite for housing." The Brief is drafted to promote a mixed use development which delivers an active and vibrant adjunct to the town centre. It is clear from para 1.7c that some of the concerns regarding the previous version of the Brief arise from the difficulty of achieving medium density housing on contaminated land, notwithstanding concerns regarding the deliverability of a heavily housing-dependant regeneration. Additionally, the value of employment is identified in 1.7d; and 3.2b identifies commercial development as a component of the mix of uses. The streets and spaces in this part of the town are extremely poor in design quality and that impacts on the character and vitality of the area; as such the creation of "an attractive environment" is an important element in	No change	21

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	commercial, retail and leisure) facilities on this important town centre site must be an essential pre-requisite for housing.		the redevelopment of the sites and evidence shows design and environmental quality will have beneficial impacts on the economy of the town and land values.		
Mark Murphy (Gloucestershire Constabulary)	Amend text to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend 3.2 (Land Use) to read "The site is suitable for a range of mixed town centre and edge of centre uses which will help to secure the sustainability of the wider site, considering the effects of crime and itâ€™s emission of green house gases. This Brief does not specify the full range of acceptable uses; it will be for the developer to justify proposed uses in terms of an ability to deliver the various objectives of the Brief and the wider Civic Pride documentation. However, the following are the explicit requirements of the Council: a Residential units achieving Secured by Design (SBD) â€™ with 40% affordable housing (see policy HS4 of the Local Plan) Crime Prevention	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service	31

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		and SBD should be used through out the design process of all dwellings including ... d About 300 public car parking spaces which provide safety and security " potentially underground... e New landscaped public squares and spaces which have been designed with the principles of CPTED"		areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Jeremy Williamson	Land use 3.2b - should this specify minimum 100 units for consistency with Para 2.3		Agree	Amend Para 3.2 a to read: "Residential units - <u>a minimum of 100 units</u> with <u>a minimum of 40%</u> affordable housing (see policy HS4 of the Local Plan)"	67
Ian Manning	Stagecoach sees no workable or desirable place for a bus interchange		The intention is to provide an alternative facility for services currently using	No change.	70

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	<p>divorced from the town centre by the inner ring road, it remains opposed to this decision and will not make use of it if built. Stagecoach only have a terminating service at Royal Well and would simply find a suitable stand for this whilst it has no intention of diverting any of its other services via a remote "node" dressed up by non-specialists when the aim of public transport is to provide attractive direct links to and from town centre locations.</p>		<p>Royal Well. It is noted that Stagecoach only makes use of Royal Well as a terminus and can easily move this to another stop. The advice of the County Council's Public Transport Officer is that other bus and coach providers - particularly those operating either country or national services - need continued provision for services which do not need to immediately access the town centre and a node at North Place/Portland Street will serve this purpose.</p>		

Design Principles

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend 3.3 A to read "Beacon" sustainability solutions are a key Civic Pride objective and public ownership of this site presents a unique opportunity to secure exemplar standards of sustainability, any design should consider the implications of crime on the town's Carbon footprint."	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	32

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend 3.3B to read "The site requires the creation of a coherent and cohesive block structure, street hierarchy and design philosophy which incorporates CPTED and SBD."	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	33
Mark Murphy (Gloucestershire Constabulary)	Amend text of para 3.3 E to include the requirements of Crime	Amend Para 3.3E to read"The site will deliver a series of vibrant streets and spaces bounded by active building frontages in order to ensure an interesting and safe public realm. They will enhance the setting of	Agree security by design is an important urban design principle, particularly in the development of this town	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car	34

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	Prevention and increase the need for Designing Out Crime.	Holy Trinity Church; link the towns two historic promenades (The Promenade and Pittville Park); link the site and the Brewery development; and mark significant focal points within the site. These areas and surrounding streets should be designed within the guidelines of CPTED and SBD, incorporating the 7 attributes as listed in the Safer Places publication and considering the requirements of Counter Terrorism mitigation"	centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	

Design Principle A - Sustainability

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text of to include the requirements	Amend text of Design Principle A (Sustainability) to read: a Development will incorporate a range of	Agree security by design is an important urban design principle,	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and	35

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	of Crime Prevention and increase the need for Designing Out Crime.	sustainable design and construction techniques, for example... vii crime prevention techniques to reduce the Carbon footprint"	particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle A to include the requirements of Crime Prevention and increase the need for	Amend text of Design Principle A (Sustainability) to read: b Roof gardens and green walls will announce the area's sustainability credentials and may become a public viewing gallery, with views across the town, and to Cleeve Hill. Green walls will soften any blank	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a	36

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	Designing Out Crime.	or inactive elevations (such as a decked car park, or end wall). But designed in a way to reduce Anti Social Behaviour, graffiti, vandalism and remove any climbing aids.	Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle A to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle A (Sustainability) to read: "c Any development should be designed to a minimum Level 4 Code for Sustainable Homes as a minimum with a commitment to increase this across the site where viable or BREEAM Very Good as a minimum, using SBD accreditation to achieve the required scoring"	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the	37

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>these should remain but be backed by a general statement in Design Principle C - "Design Quality".</p>	<p>principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</p>	
<p>Mark Murphy (Gloucestershire Constabulary)</p>	<p>Amend text of Design Principle A to include the requirements of Crime Prevention and increase the need for Designing Out Crime.</p>	<p>Amend text of Design Principle A (Sustainability) to read: "e Materials should be sourced locally wherever possible and procured from sustainable sources, any feature should be designed to allow for a speedy replacement following damage or vandalism"</p>	<p>Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".</p>	<p>Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</p>	<p>38</p>

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle B to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle B (Structure) to read: "a The current split of the site along North Street offers an opportunity to consider the creation of two distinct character zones " although there may be other contextually sensitive layouts. The development should be considered as an entirety with design codes, master planning and outline planning applications avoiding the temptation to break the area into land parcels"	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	39
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle B to include the requirements of Crime Prevention	Amend text of Design Principle B (Structure) to read: "c A perimeter block approach to new development on the site, which builds on the surrounding historic form and assists in reinforcing	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will	40

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	and increase the need for Designing Out Crime.	the secure boundary of each dwelling, will help to create a clear hierarchy of spaces and a clear distinction between private and public space. It will also present an opportunity to complete currently fractured building lines along Portland Street and North Place."	number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle C to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle C (Design Quality) to read: "c The design process will be based on place-making "developing the vision for the site envisaged through the other Civic Pride Strategies before moving to detailed design of buildings, traffic management regimes and crime prevention design principles"	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and	41

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle C to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle C (Design Quality) to read: "d Streets and spaces will establish the structure for the development of the site and they must be well considered both strategically and in detail, using a landscape-led approach using a landscape-led approach which applies CPTED principles to all areas. Detailed landscape plans will be required with planning applications."	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	42

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle C to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle C (Design Quality) to read: "e In order to help create an identity and sense of place the materials used in buildings, streets and spaces will be high quality, resistant to attack or abuse and long lasting. For streets and spaces, the Public Realm Strategy sets out a set of requirements for street furniture, surface materials, lighting and other elements."	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	43
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle C to include the requirements of Crime Prevention	Amend text of Design Principle C (Design Quality) to read: "g The quality of detailing will be important to the success of the proposals and should reflect the need for crime prevention. The submission	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will	44

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	and increase the need for Designing Out Crime.	of detailed plans, sections and elevations will be required for selected elements as part of detailed planning applications."	number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Jeremy Williamson	Design Principle A (b) - amend "will" to "may/could" - too explicit at this stage		Agree, use of " will" is too positive prior to detailed design stage, but there should be an aspirational requirement to announce green credentials as part of the development.	Amend Design Principle A - Sustainability - para (b) "Roof gardens and green walls <u>should be used to</u> announce the area's sustainability credentials..."	68

Design Principle D - Movement

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Stephen Clarke (Cheltenham Civic Society)	Whilst we agree that there should be no increase in the number of access points from St Margaret's Road we feel it unnecessary to restrict access to the existing North Place but rather allow developers to determine their own access point.		Agree that access opportunities should not be restricted to North Place - subject to modelling, there are likely to be opportunities on Portland Street and other locations. It is the Highway Authority's view is that the introduction of a new junction onto the Cheltenham Northern Relief Road (St Margaret's Road) would introduce further delays and congestion to an existing vital transport corridor. Additionally, it is important that provision of access points around the site does not compromise urban design objectives which are seeking the creation of vibrant streets and spaces, good pedestrian linkages and enhanced street scene. Suggest specific reference to North Place is deleted, but that the concern about congestion and	Amend Design Principle D(f) (page 17) to read " <u>There are a variety of access opportunities to the site. The Highway Authority's view is that the introduction of a new junction onto St Margaret's Road would introduce further delays and congestion to an existing vital transport corridor and vehicular access to the site here is unlikely to be acceptable. Additionally, choice of access points will not be allowed to compromise urban design objectives which are seeking the creation of vibrant streets and spaces, good pedestrian linkages and enhanced street scene. Access proposals will be subject to modelling. All streets within the site will be designed to a maximum of 20mph.</u> "	10

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			urban design issues is identified.		
Stephen Clarke (Cheltenham Civic Society)	In general we agree with the parking requirements and restrictions with the following reservation. Restricting parking to 0.8 places per unit does not seem to reflect current behaviour concerning car ownership and would seem to lead to excessive street parking elsewhere, adding to streetscape clutter. We support the concept of underground parking where feasible.		Agree. There is a move away from specific parking standards towards an evidence base for parking provision. Evidence is required on the type of dwelling, provision of parking (on site or on street), controlled or uncontrolled, along with the availability (or otherwise) of additional public car parking etc. It should be a requirement that individual developers set out the evidence base to back up the level of provision proposed. This should be done in liaison with the LPA and the Highway Authority. It is therefore premature, to include the level of 0.8 per dwelling in the development brief. Note	Design Principle D - Movement - Delete existing bullet (g)(i) and replace with: " <u>Residential parking levels will be agreed with the planning and highway authorities and will be based on evidence related to the need of accommodation provided and the availability of parking in and around the development overall.</u> "	11

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			support for underground parking. On-street car parking can usefully activate streets and make efficient use of streets without cluttering if properly managed.		
wraith	Design Principle D e - North Place/ Portland Street is too far out of the town centre to be the hub for coaches and busses - most users are elderly, infirm, students and poor.		Disagree. Portland Street is a similar distance from the core of the town centre as the current bus interchange at Royal Well and is better connected to the strategic road network. Additionally, it is a comparatively less constrained than Rooyal Well in terms of landscape & townscape sensitivity, shape etc. and offers better opportunities for the development of a bus hub.	No change.	15
wraith	Design Principle D (g & h) - Car park to be either underground or planted with trees and built into the public space in curves and circles, not squares.		Agree there are a number of options for the provision of car parking, these include underground and on-street. For	Amend Design Principle D (h)(i) to read "On-street <u>or in public spaces</u> - in secure, overlooked...etc.)	18

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>clarity, public space could be introduced as an additional option. It is in appropriate to detail exactly the form (curved, square etc.) which would be suitable prior to a detailed scheme being available.</p>		
Gloucestershire County Council	<p>Car parking: PPS3 - Housing (June 2010) states in paragraph 51 that Local Planning Authorities should, with stakeholders and communities, develop residential parking policies for their areas, taking account of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently. The SPD and technical appendix refer to a residential car parking requirement of 0.8 per dwelling. However, no evidence is provided to back this level.</p>	<p>Evidence is required on the type of dwelling, provision of parking (on site or on street), controlled or uncontrolled, along with the availability (or otherwise) of additional public car parking etc. It should be a requirement that individual developers set out</p>	<p>Agree. There is a move away from specific parking standards towards an evidence base for parking provision towards an evidence based approach. This should be reflected in the Brief.</p>	<p>Design Principle D - Movement - Delete existing bullet (g)(i) and replace with: "<u>Residential parking levels will be agreed with the planning and highway authorities and will be based on evidence related to the need of accommodation provided and the availability of parking in and around the development overall.</u>"</p>	2

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		<p>the evidence base to back up the level of provision proposed. This should be done in liaison with the LPA and the Highway Authority. It is therefore premature, to include the level of 0.8 per dwelling in the development brief.</p>			
<p>Simon Steele-Perkins (Strategic Land Partnerships)</p>	<p>The revised requirement to incorporate a bus interchange will simply add to the costs.</p>		<p>There is inevitably a cost associated with the provision of a bus interchange. However, the siting of an interchange has long been criticised as a missing element from the wider Civic Pride project and this site's location on the bus spine and on the town's strategic highway network is a</p>	<p>No change.</p>	<p>23</p>

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			good position for such a use. It is appropriate on a large site of this nature that strategic infrastructure of this sort is sought.		
Stephen Bareham	Our main concern with these proposals which we would hope would be addresses as this project progresses would be an assurance of adequate parking provision. Trinity currently has capacity in its main church building for approximately 800. In addition to this we have multi-purpose facilities across Trinity Lane which are capable of hosting concurrent events for several hundred people, involving a wide range of community engagement activity. Although the use of our buildings is concentrated on Sundays, all of our facilities are heavy used during the week with activity most days and evenings. It is essential that the ability for our congregation and the local community to have direct access to the church, not only through public transport and pedestrian access by also by car. The congregation		Note concerns over parking, however, the COuncil does not consider that there will be shortage of parking for Trinity Church as a result of the Brief. Following development of the site there will be at least three car parks within 400m of the Trinity Church - Portland Street (Brief requires 300 spaces minimum); Brewery (350 spaces); Henrietta Street (120). These will provide in the region of 770 off-street within a 5 minute walk, with other town centre car parks a close-by. In addition, town centre buses and Park & Ride stop within 300m.	No change.	26

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	are already penalised through the expansion of Sunday parking charges and increased on-street parking restrictions and we would want to have reassurance that this wouldn't be exacerbated through these plans.				
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle D to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle D (Movement) to read: "c All streets will provide access for pedestrians and disabled people in a safe and attractive and crime free environment with plenty of seating so that the less able can rest en route. Shared surface streets in particular will be designed so that the visually impaired can use	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental	45

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		them safely and confidently."		Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle D to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend text of Design Principle D (Movement) to read: "d Routes through the site will accommodate calmed cycling movement " providing convenient and safe links to the emerging wider network of cycle routes and addressing severance by major roads	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of	46

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		<p>around the site. Cycle parking will be well overlooked, easily accessible, fitted with "Sold Secure"™ ground anchors and some will be covered."</p>	<p>considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".</p>	<p>private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</p>	
<p>Mark Murphy (Gloucestershire Constabulary)</p>	<p>Amend text of Design Principle D to include the requirements of Crime Prevention and increase the need for Designing Out Crime.</p>	<p>Amend text of Design Principle D (Movement) to read: "h There are a variety of options for the location of parking, each option should be designed to encourage safety and security... etc."</p>	<p>Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary.</p>	<p>Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide</p>	<p>47</p>

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".</p>	<p>active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."</p>	
<p>Mark Murphy (Gloucestershire Constabulary)</p>	<p>Amend text of Design Principle D to include the requirements of Crime Prevention and increase the need for Designing Out Crime.</p>	<p>Amend text of Design Principle D (Movement) to read: "i Residential cycle parking will be at 2 spaces per unit in convenient location, secured with appropriate</p>	<p>Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of</p>	<p>Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and</p>	<p>48</p>

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		ground anchors and offering a dry locations shelter."	statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Wm Morrison Supermarkets Plc	The brief should allow for alternative access other than North Place provided these can be justified in highway terms.		Agree that access opportunities should not be restricted to North Place -	Amend Design Principle D(f) (page 17) to read " <u>There are a variety of access opportunities</u>	59

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			<p>subject to modelling, there are likely to be opportunities on Portland Street and other locations. It is the Highway Authority's view is that the introduction of a new junction onto the Cheltenham Northern Relief Road (St Margaret's Road) would introduce further delays and congestion to an existing vital transport corridor. Additionally, it is important that provision of access points around the site does not compromise urban design objectives which are seeking the creation of vibrant streets and spaces, good pedestrian linkages and enhanced street scene. Suggest specific reference to North Place is deleted, but that the concern about congestion and urban design issues is identified.</p>	<p><u>to the site. The Highway Authority's view is that the introduction of a new junction onto St Margaret's Road would introduce further delays and congestion to an existing vital transport corridor and vehicular access to the site here is unlikely to be acceptable. Additionally, choice of access points will not be allowed to compromise urban design objectives which are seeking the creation of vibrant streets and spaces, good pedestrian linkages and enhanced street scene. Access proposals will be subject to modelling. All streets within the site will be designed to a maximum of 20mph."</u></p>	

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Stephen Clarke (Cheltenham Civic Society)	We have concerns about the placement of the bus Interchange in Portland Street with its associated facilities such as toilets, kiosk and taxi rank. We suggest that the bus interchange is in North Place, possibly adjacent to the car park. It is unclear as to what the purpose of the 6 bay bus node is. (Technical Appendix 1.7 e, 1.10 c, 2.15 f iii, 3.2 c, Design Principle D e) We assume that this is not intended to replace similar facilities and dropping off points for the out of town services within the town centre, but rather provide additional facilities for north Cheltenham. We hope that the intention is to make the use of public transport much more integrated and easier to use and not to spread the interchange far and wide across the town, making it difficult to use more than one route to make a journey.		A bus node location on Portland Street relates well to the bus spine. The intention is to cater for "rural" and national services, displaced from Royal Well. The intention is to improve facilities for public transport users.	No change.	6

Design Principle E - Streets and Spaces

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
wraith	<p>Design Principle E - How about creating another park; playgrounds for children, teenagers and adults (have you seen the 'seniors' playground in Hyde Park, London?); a planted maze such as at the Rococco Garden in Painswick; a skating rink; allotments; a 'city' or school farm (e.g. like Cardinal Wiseman school in Coventry)? Few of these will make money so maybe not to be considered. Do you know something called One Planet Living? www.oneplanetliving.org They are involved in some interesting community development projects in London working with BioRegional Development Group and the WWF.</p>		It is not appropriate for the Brief to incorporate this level of detail. The brief is seeking high quality spaces and vibrant uses and any of these suggestions might be suitable, dependant on the details submitted for any scheme.	No change.	19
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle E to include the requirements of Crime Prevention and increase the	Amend text of Design Principle E (Streets and Spaces) to read: "b The new buildings enclosing the	Agree security by design is an important urban	Add new paragraph (i) to Design Principle C "Design Quality" to	49

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	need for Designing Out Crime.	streets and spaces will take their cue from surrounding historic development and make a positive contribution to on-street activity and passive surveillance. Street frontages will include main entrances at regular intervals and active rooms. In order to help activate frontages, encourage natural surveillance and protect amenity, private rooms, such as bedrooms and bathrooms will not be permitted on ground floor street frontages."	design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle E to include the requirements of Crime Prevention and increase the	Amend text of Design Principle E (Streets and Spaces) to read: "c To encourage safe streets, cafes	Agree security by design is an important urban	Add new paragraph (i) to Design Principle C "Design Quality" to	50

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	need for Designing Out Crime.	will be encouraged to spill out onto streets by increasing the depth of the paving, residential development will have opportunities for personalised space on street frontage (balconies, front gardens etc) in an effort to promote ownership and create defensible spaces."	design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle E to include the requirements of Crime Prevention and increase the	Amend text of Design Principle E (Streets and Spaces) to read: "e To engender a strong sense of	Agree security by design is an important urban	Add new paragraph (i) to Design Principle C "Design Quality" to	51

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	need for Designing Out Crime.	place and community cohesion, streets should be designed as outdoor rooms accommodating variety activity (variously - movement, parking, quiet relaxation, children's play and social activity). As indicated earlier, a strong landscape structure is required to create attractive streets and spaces. Natural surveillance and CPTED should be encouraged through these spaces and incorporated in the use of abundant tree and shrub planting, opportunities for public art and high quality surface materials."	design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Design Principle E to include the requirements of Crime Prevention and increase the	Amend design Principle E (Streets and Spaces) to read: "h iii incorporate robust hard and soft landscaping,	Agree security by design is an important urban	Add new paragraph (i) to Design Principle C "Design Quality" to	52

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	need for Designing Out Crime.	demonstrating crime prevention principles through layout and street furniture, providing areas of sun and shade and enabling flexibility of use (including quiet space, performance, meetings, social activity, play, and through pedestrian movement)."	design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Jeremy Williamson	Design Principle E h ii add potentially to start of sentence		Disagree - any new space marking a northern	No change.	69

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
			gateway to the town which is part of a link between the Promenade and Pittville and which addresses Portland Street must establish an enhanced setting for Holy Trinity Church. If the space is beyond the Church's immediate location it will need have an impact along Portland Street which achieves this.		

Information

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text of Para 4.1 Developer Contributions to include the requirements	Amend Para 4.1 to read: "4.1. Developer contributions will be expected to: a Provide on-site affordable housing in line with local policy and	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe	53

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	of Crime Prevention and increase the need for Designing Out Crime.	fully accredited with Part 1 and Part 2 of Secure by Design; ...etc."	is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	
Mark Murphy (Gloucestershire Constabulary)	Amend text of Para 4.1 Developer Contributions to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend Para 4.1 to read: "4.1. Developer contributions will be expected to: d Provide play space and equipment appropriate for the site's residential space and potentially provision of an outdoor gym. These facilities need to be designed to reduce the risk of damage, inappropriate use and Anti	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire Constabulary. There are a number of brief references to the creation	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces and service areas. Spaces and streets will meet Crime Prevention Through Environmental	54

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		Social Behaviour. This provision is likely to be linked to the cost of developing new public realm and streetscape; ...etc."	of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	

Information

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Mark Murphy (Gloucestershire Constabulary)	Amend text of Para 5.2 to include the requirements of Crime Prevention and increase the need for Designing Out Crime.	Amend Para 5.2a to read: "a A Design and Access Statement illustrated with concept diagrams and sketches explaining the design principles on which the development is based and how these are reflected in its layout, density, scale, landscape, visual appearance and relationship to the town centre. Statements must be compliant with the Communities and Local Government's "Guidance on information requirements and validation", particularly Paragraph 132 which states "Design and access statements for outline and detailed applications should therefore	Agree security by design is an important urban design principle, particularly in the development of this town centre site. However, it is not considered appropriate to include large number of statements on security in each relevant paragraph of the Brief, as suggested by the Gloucestershire	Add new paragraph (i) to Design Principle C "Design Quality" to read: "The design and layout of streets, spaces and buildings - including the bus interchange and car parking - will create safe and secure environments. Streets and spaces will be active and vibrant. They will be enclosed by buildings which provide active edges and natural surveillance. There will be a structure to urban blocks, which maximises security of private spaces	55

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
		demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System and Crime Prevention and the CABE guidance on design and access statements."	Constabulary. There are a number of brief references to the creation of safe streets and spaces throughout the document. It is considered that these should remain but be backed by a general statement in Design Principle C - "Design Quality".	and service areas. Spaces and streets will meet Crime Prevention Through Environmental Design standards and buildings will meet Secured by Design standards. The development will incorporate the principles set out in Safer Places and, where appropriate, incorporate the requirements of Counter Terrorism mitigation."	

Planning Context

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Gloucestershire County Council	Travel Plans: Appendix 1 of the development brief refers to Cheltenham Borough Council's Travel Plan SPG. This SPG is considered to be out of date. It is proposed that it is more relevant to refer in the development brief, to seeking advice on travel plans directly from the Highway Authority.	It is proposed that it is more relevant to refer in the development brief to seeking advice on travel plans directly from the Highway Authority.	Agree.	Design Principle D - Movement - Add additional sentence to the end of the introductory paragraph to read: " <u>In order to address how sustainable travel is delivered on the development, it is likely that there will be</u>	3

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
				<u>a requirement for a travel plan - advice is available from the Highway Authority."</u>	

Biodiversity

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Gloucestershire County Council	It is noted that section 3.41 of the SPD is now called 'Sustainability' and the scope of approach is beneficially widened. The Technical Appendix promotes sustainable design which could provide opportunities for biodiversity gain. On page 23 the developer guidance should be expanded to mention: ? linkage to existing green space in surrounding areas as well as just provision of green space within the site itself ? support for personalised green space that would be managed by people to benefit flora and fauna This is because these items have been picked up in the SA (see below) but not mentioned in the Technical Appendix. In March 2008 the County's Biodiversity Officer made comments on the SA supporting the Cheltenham Civic Pride Urban	This is to be supported and needs to be reflected in the content of the Technical Appendix (see above). For Option 1 (the revised proposal being consulted on) Table 4.2 mentions green roofs and a green wall along the exposed sections of a multi-storey car park. SuDSs (of which green walls and roofs could be integrated into) are highlighted which could achieve some modest biodiversity benefits across this built up site. The management of personalised green space for the benefit of flora and fauna is also referenced as an opportunity. It is unclear however	Page 23 is an extract from an Environment Agency letter of April 2008, appended for information. It would not be appropriate to amend it. However, the points regarding linkages to existing green	Amend Design Principle B - Structure para (c) by the addition of the following: <u>"...The layout of streets and spaces should contribute to the strategic context of green spaces around the site and seek to encourage links - both in terms of</u>	4

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
	<p>Design Framework. Referring to these we are pleased to see that these recommendations have been almost entirely taken up in the SA that accompanies the current consultation. In section 2.6.1 it is stated: A number of green and open spaces are situated beyond the site but are not well linked. There is an opportunity to link some of these green spaces together through the provision of green spaces as part of the redevelopment of this site.</p>	<p>how this might be promoted by the Borough Council although it fits in well with the Council's statutory biodiversity duty. The County's Biodiversity Officer recommends the following minor addition is made to the new SA document: Page 18 add in "A new framework for delivering priority habitats and species in England (2008)"</p>	<p>space and use of personalised green space are well made and need to be incorporated in the brief - probably as part of Design Principle B - Structure (existing green space) and Design Principle E - Streets and Spaces (personalised green space).</p>	<p><u>pedestrian and cycle movement and for the benefit of biodiversity."</u></p> <p>Amend Design Principle E - Streets and Spaces para (e) by the addition of the following: "... <u>This will be supported by the opportunity to personalise private outdoor spaces, and there should be an opportunity for this on all residential properties."</u></p>	

Archaeology

Name	Comment	Change Requested	Officer Response	Officer Recommendation	ID
Jeremy Williamson	Para 2.11 Just to note that separate analysis being undertaken.		Land at Warwick Place in GCC ownership is to be included in the site are of the Brief.	Amend Plan 2 to include land in GCC ownership at Warwick Place within the Brief.	65

Report run at 30 Nov 2010 17:45:28. Total records: 69.