The Cheltenham Plan 2011-2031

Report of consultation to accompany the pre-submission version of the plan
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Preface

This report sets out how Cheltenham Borough Council (CBC) undertook consultation between 2013 and 2017 to inform the Pre-Submission version of the Cheltenham Plan. The document summarises how we consulted, who was invited to make representations, the comments that were received and how we have responded to these in preparing the Pre-Submission Plan.

The consultations have been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 22) (1) (i)-(iii) which state that a Consultation Statement must be produced to show:

- Which bodies and persons CBC invited to make representations under Regulation 18
- How those bodies and persons were invited to make representations under Regulation 18
- A summary of the main issues raised by the representations made pursuant to Regulation 18, and
- How any representations made pursuant to Regulation 18 have been taken into account

CBC undertook three Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

i. The first consultation was undertaken on the Cheltenham Plan Scoping Report during an 8-week period ending on the 2nd September 2013.

ii. The second consultation was undertaken on the Cheltenham Plan (Part One) Issues & Options during a 6-week period in June / July 2015.

iii. The third consultation was undertaken on the Cheltenham Plan (Part One) Preferred Options during an 8-week period in January / February 2017 and was a non-statutory stage of consultation.

Therefore, in total, we consulted for over 20 weeks and have given the community significant opportunity to provide input and comment on the emerging Cheltenham Plan. This significantly exceeds the 6-week statutory consultation period stipulated in the Regulations.

Over 600 people/organisations inputted into the three rounds of consultation providing in excess of 1100 comments. This paper sets out the detail of each consultation and our response to the comments received during each consultation. It also sets out what consultation was undertaken, when, with whom and how it has influenced the latest version of the plan (i.e. the Pre-Submission version).

It is envisaged that this Consultation Statement will assist the Inspector at Examination in determining whether the Borough’s Local Plan complies with the requirements for public participation and government guidance.

The Council considers that the paper demonstrates the consultation was carried out in compliance with the statutory requirements as set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). Also, that the report shows public involvement was carried out following the approach set out in the Council’s Statement of Community Involvement (SCI).
Cheltenham Plan scoping consultation

Introduction
An eight week consultation ended on 2 September 2013. It looked to decide on the focus of the Cheltenham Plan. In total we received 52 responses from a range of interest groups, public and private sector bodies, and individuals.

Overview
The scoping questionnaire included a total of 14 questions, mainly examining the vision for Cheltenham, the objectives of the Cheltenham Plan and how to tailor them to be specific to avoid cross-over with the JCS.

Comments on the vision included support for the extant corporate vision alongside some criticism of the JCS vision. Some notable points were a need for infrastructure improvements to be included, as well as provision of sufficient housing, an enhanced tourism offer and re-use of previously developed land. A number of responses noted a tendency for existing visions to relate to “anytown” needs and called for more specificity for the town.

Respondents were asked to give their own vision for Cheltenham. Issues that featured frequently included better public transport provision (road & rail), a balance between a range of potentially conflicting concerns such as growth versus conservation of valued assets, encouragement of sustainability and protection of green assets, along with other infrastructure improvements such as affordable housing and crime prevention.

The idea of a themed vision was also tested and generally respondents were in support of it. Some were not while others had reservations over whether depth would be lost and if more nuanced issues would be overlooked.

The questionnaire gave respondents the opportunity to state one aspect of Cheltenham they liked most and one that needed to change. The positive comments generally focused around the quality of the built environment, especially trees and open spaces. Vibrant culture and the multitude of festivals that add to the town’s vitality were also cited. Negative issues tended to revolve around transport problems and the effect of increased pedestrianisation. Other problems included poor quality suburbs, unused brownfield sites and shabby buildings, a persistent threat to the green environment from new development/growth and poorly linked retail centres.

Objectives were taken from existing plans and presented to respondents to comment on their importance, using a scale of Very Important, Quite Important, No View and Not Very Important. Most objectives were deemed by most respondents to be either very important or quite important. Good design, conserving landscape and the green environment, re-using brownfield land, economic vitality and sustainable transport had the highest number of “very important” responses. Safeguarding existing employment land and provision for the elderly/disabled had the most “quite important” responses. The highest number of “not very important” responses applied to safeguarding existing employment land and preventing the coalescence of Cheltenham with other settlements – recreation/leisure and tourism also attracted a high instance of responses in this category.
When asked what other objectives could be included, a range of objectives were suggested, such as greater emphasis on cycle and walking provision, as well as improved local shopping provision.

In terms of making objectives more specific to Cheltenham, several comments highlighted building upon the essential character of Cheltenham, such as Regency architecture/layout, landscape setting and related matters. Calls were made for greater “local” responsiveness that recognises the individual character of the various urban and suburban components of the town and its peripheral villages. Some concern was expressed about not allowing these local distinctions to be compromised or homogenised by JCS growth proposals, fearing major growth could reduce Cheltenham’s distinctiveness.

Suggestions for topics that had been missed included regeneration of the High Street; cycle paths rather than marked lanes on roads; the sense of a transport strategy guiding the element of the plan; the link between the nature of the town and its economic success and quality of life; designing out crime; farming and agriculture; sufficient reference to sport and the racecourse; and meeting the needs of young people and the unemployed.

To develop the policy areas, respondents suggested a number of approaches. Ensuring better co-ordination with JCS partner authorities was common. Undertaking face-to-face research interviews to establish people’s concerns about living in and visiting Cheltenham was also recommended. Specific policies for Cheltenham Racecourse and gypsy and traveller accommodation were suggested to increase specificity of the plan to Cheltenham. Multiple suggestions were given for environmental issues, such as establishing a green network, reinstating Local Plan environmental objectives, strengthening the approach to development affecting landscape, AONB and biodiversity and including water improvement and pollution prevention policies.

Respondents were also asked to consider what factors would be key in making the plan deliverable, where finances was most commonly cited. Other factors included political and public support as well as a robust evidence base.

Finally, further comments were requested. Some of these focused on the importance of partnership working, particularly within the JCS. Others emphasised environmental concerns like making a theme around careful use of natural resources or maximising sustainable transport opportunities. Some considered the mechanics of the plan, such as how the JCS and Cheltenham Plan would dovetail or how the plan would facilitate and inform Neighbourhood Planning.
Cheltenham Plan (Part One): Issues and options consultation

Introduction
Cheltenham Borough Council published the ‘Cheltenham Plan (part one) issues and options’ document for a six week public consultation in summer 2015. This follows on from the Scoping (Regulation 18) 2013 consultation. The consultation opened at 12am on Monday 22 June and closed at 5pm on Monday 3 August 2015; businesses, residents and visitors to Cheltenham were invited to submit comments online.

A copy of these consultation documents, questionnaires, maps and supporting evidence were made available on the Council website. Hard copies were also made available at the deposit locations as required by the Statement of Community Involvement document. The consultation was based on a questionnaire which sought views on Cheltenham’s economy and employment sites, local green spaces and potential future development sites.

An interactive online map showing local green space, existing employment sites, potential development site options and sites with existing planning permission for residential and/or employment development was made available at cheltenham.gov.uk/maps. Evidence supporting the emerging plan was also available for comment, this included the Cheltenham economic strategy paper, the local green space study, the AONB landscape sensitivity study and the integrated appraisal scoping paper.

1,266 people, businesses and organisations (statutory and non-statutory) were contacted via email using the INOVEM consultation system. A further 47 people, businesses and organisations were contacted by letter, these were mostly land owners. 556 people, businesses and organisations (statutory and non-statutory) completed questionnaires.

122 questionnaires were completed online the remaining 444 completed questionnaires were emailed to local.plan@cheltenham.gov.uk or were posted to Municipal Offices, Cheltenham. One of these questionnaires was a test carried out by officers.

Six weeks prior to the consultation starting the Council advertised the consultation to local stakeholders in line with Gloucestershire compact agreement as set out in the council’s Statement of Community Involvement. A press statement was published on the council’s website a week before the consultation. The Gloucester Echo published an article advertising the consultation on their website on 21 June 2015.

The council held a number of consultation events across Cheltenham during the six week period, these were:

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<th>Date</th>
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<tr>
<td>18/05/2015</td>
<td>Hesters Way Partnership</td>
<td>18:30</td>
</tr>
<tr>
<td>26/05/2015</td>
<td>Neighbourhood Co-ordination Group chairs</td>
<td>17:30</td>
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2 Including all those identified by the land registry as owners of land being considered at this stage for local green space designation
3 SCI paragraphs 8.1 and 8.2
Overview
The questionnaire included 43 questions that focused on four key areas: the plan’s vision and objectives, the Cheltenham economy and existing employment sites, local green spaces and future development sites.

A significant proportion of comments focussed on local green spaces and in particular the need to protect the Leckhampton fields and fields surround Swindon Village from development. Many sought to use this consultation as another opportunity to register their opposition to the Joint Core Strategy which seeks to allocate these two areas for residential and mixed use development.

During the 6 week consultation Tewkesbury Borough received a petition regarding land at White Cross Green (also known as Land to the west of farm lane, Shurdington) in Tewkesbury Borough, which is adjacent to Leckhampton. The petition (postcard) requested Tewkesbury Borough Council (TBC) to designate the land as local green space and reject proposals for residential development; TBC received 380 postcards. Tewkesbury Borough Council resolved to grant planning permission for residential development on land at White Cross Green in September 2015. The petition did not reference the issues and options consultation and was not in responses to a request in the consultation, but it is seen as an important local issue that occurred at the same time by many participants and it is relevant to the ongoing local green space application at Leckhampton.

Several respondents felt that parts one and two of the plan should be joined and many expressed concerns that development sites should not be selected ahead of assessments on green space and recreation needs. Similarly some respondents felt there was too much emphasis on development and not enough on conserving and sustaining the quality of the town and environment (including urban green spaces).

Some responses raised concerns about the robustness of the AONB landscape report, including a report from the ‘Save our AONB’ group. These comments and others have been passed to Ryder Landscape for their consideration.

The quality of Cheltenham’s built environment, including parks, trees and open spaces as well as the town’s broader landscape setting was often cited and highly prized by respondents. This message was also identified at the previous scoping stage.

Vision & Objectives
Over two-thirds of respondents, that answered the question, agreed with the draft vision and objectives, although 22 respondents did not agree. Some felt the terminology / phraseology meant the vision objectives were unclear, too generic and did not reflect Cheltenham. It was argued that the council should ensure the vision and objectives act as a guide in the policy making exercise as was well providing prompts to the interpretation of objectives.

A further refinement of the objectives was suggested especially where objectives are mutually exclusive (protecting green fields and landscapes vs growth). It is argued by some that this would
help to avoid a stalemate in any future planning balance exercise. A number of respondents raised issues relating to the AONB and highlighted the need to protect it from development as an objective.

It was suggested that the Plan should bear a much stronger link to the principles, aims and objectives as set out in the Joint Core Strategy (JCS). Particularly, with reference to ensuring provision of sufficient housing land that meet the needs of the current and future population of the Borough. Some respondents felt the inclusion of measurable targets as part of the objectives would provide the Cheltenham Plan with a clearer and stronger strategic focus, upon which the success of the Plan can be understood and monitored.

Cheltenham Economy
This chapter was split into three policy approaches and each approach identified a number of policy options, these are:

A. Safeguarding existing and future employment land (22 in favour, 11 against; option 3 most preferred);
   - OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2;
   - OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development;
   - OPTION 3: Protect the best and evaluate the rest;
   - Other option;

B. Promoting one type of industry over another (13 in favour, 4 against; option 4 most preferred);
   - OPTION 4: Introduce selective management of Cheltenham’s economy;
   - OPTION 5: No policy intervention;
   - Other option;

C. Promoting a Cyber Security cluster (12 in favour, 3 against; option 6 most preferred);
   - OPTION 6: Introduce a cyber-security cluster;
   - OPTION 7: Do not promote cluster development; and
   - Other Option.

Although there were over 550 questionnaires submitted during the six week consultation most did not answer every question available on the questionnaire. Options presented in the economic chapter were selected 47 times; this was further supported by 238 free textbox comments.

Several respondents focused on NPPF paragraph 22 which states councils should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Significant numbers opted for option three; in essence it offers the greatest flexibility and creative approach to safeguarding employment land. Protecting employment sites suitable for growing high GVA employment was a key theme to emerge. Others recommended allowing more flexible employment use on sites where there is persistent vacancies, reasoning this would ensure the council has policies flexible enough to adapt to future trends and technology advances.

In broad terms respondents recognised land availability is constrained and suggested industries that can provide added benefit to Cheltenham’s economy and the town should be promoted over others. Conversely several respondents felt this was not the role of town planners and the council to micromanage the local economy, it should be market led with flexible planning policies to support the local economy. Only in exceptional cases should the Council intervene.
Respondents identified the crucial role GCHQ plays in Cheltenham future economy. A cyber security (high technology) cluster was very well supported. Many supported the actions to grow the cyber security industry in Cheltenham however a few cautioned this should not be at the expense of other industries. Some believed other industries should be the focus of a cluster policy, examples include high tech industries, defence, IT, education, manufacturing, cultural industries and promoting corporate HQs.

Some raised the importance to protect small light industrial units from changing use to housing. It was argued these units support small scale/family run businesses, which find it difficult to relocate to big and expensive industrial parks. Several respondents also felt the council should make the planning process easier, especially for small changes on industrial estates and where the neighbours are unlikely to object.

Several references were made about the Cheltenham economic strategy study. Several felt there were issues missing from the study, tourism was cited several times. It should be noted the Council is currently preparing a tourism strategy that will complement the economic strategy study. Comments specifically relating the economic strategy study will be sent to and be considered by Athey Consultants.

**Local Green Space**

This chapter identified three policy options, these are:

- **OPTION 8**: Allocate all designated ‘Public Green Spaces’ as ‘Local Green Spaces’;
- **OPTION 9**: Maintain existing local ‘Public Green Spaces’ and only allocate ‘Local Green Spaces’ that meet the framework’s criteria;
- **OPTION 10**: Maintain existing approach of designating ‘Public Green Spaces;
- Other option;

Option nine was the clear favourite with 292 out of a total of 322 responses in favour. Several organisations did not give a view on their preference but did request all existing sites be considered collectively rather than as a series of individual sites and to consider integrating green spaces with strategic green infrastructure opportunities.

The majority of respondents commented on local green spaces issues, with approximately 1,700 uses of the term across all submitted questionnaires. The Leckhampton Fields sites (CP106, CP107 & CP108) accounted for 43% of all LGS comments. Redthorn Way, Swindon Village, and the A40 corridor were all referenced over 100 times. The vast majority (99%) of comments relating to the 29 LGS sites (as identified in the consultation document) were in support; although levels of support for individual sites varied considerably. Those not in favour of a LGS designation only registered opposition to Leckhampton Fields, and Swindon Village.

Several new LGS sites were promoted, these include:

- Ashley Close adjacent to number 16;
- Honeybourne Line;
- Caernarvon Park, Up Hatherley
- Open space between Cirencester Road and Newcourt Road, adjacent to the car wash site;
- Holy Apostles Primary School Fields;
- Glenfall Way School site;
- Reeves Field (A toolkit was submitted in support of this site).
General suggestions were also made and included all school playing fields, the countryside immediately adjacent to the town which is heavily used by the public for informal recreation, orchards and ancient woodlands. The Honeybourne line was suggested by a number of respondents although some respondents felt that a local green space designation might constrain potential sustainable transport projects in the future.

Several land owners expressed concerns about potential local green space designations on their land. Several stated that Local Green Space should not be used to undermine aims of identifying sufficient land at suitable locations to meet identified development needs. At least one respondent felt the plan should make clear the local green space study simply reported on feedback from interest groups on their desire for Local Green Space designation. It did not provide analysis or critique of suggestions and made no recommendations.

The Big Local project in St Peter’s and the Moors response identified the need to consider the importance of maintaining and improving the area’s local green space. Some of the spaces Big Local, the West End Partnership and local residents have cumulatively identified within the area that require consideration are:

1. Elmfield Park
2. The Old BMX track (the Moors)
3. The Hardwicke Green (University Of Gloucestershire)
4. The Folly (University Of Gloucestershire)
5. The Old Peace Garden (Tewkesbury Rd)

**Development Sites**

103 potential site allocations were presented in the consultation document and approximately 350 references were made to these sites.

Whilst JCS urban extensions sites did not feature in this consultation many respondents objected to these allocations. Of the sites that did feature in the consultation Glenfall Way (CP029) was the most discussed development site. The agent promoting the land for development requests the site be allocated for residential development. All other comments disagree and they do not consider the site suitable for residential development. Save our AONB action group identified a number of issues with the AONB landscape sensitivity study and submitted a report explaining their concerns. These comments will be sent to and be considered by Ryder Landscape.

Most were not in favour of development at Priors Farm and stressed the need to protect the land for the health and wellbeing of local residents; conversely some respondents recognised greenfield sites adjoining the principal urban area may be required to meet the challenging housing requirement, although this should only occur once all brownfield sites have been developed.

Most supported housing and mixed development on North Place and Portland Street. Historic England stresses the need to ensure development integrates with the townscape and complements rather than competes for attention with Regency Cheltenham.

The vast majority of comments made in relation to green belt sites were not supportive of development and expressed the need to maintain the existing Green Belt boundaries. Land at and adjacent to the Reddings and land at West Cheltenham (JCS safeguarded land) were highly cited.

A good proportion of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many
also referenced the JCS examination and challenged Cheltenham’s housing numbers (objectively assessed housing need).

The County Highways department submitted a succinct comment for each site that focussed exclusively on highway access. The Environment Agency, Historic England and Natural England (statutory consultees) also provided detailed guidance and advice on a number of sites.

Several new sites and development locations were promoted and suggested during the consultation, these include:

- The East Gloucestershire Club, Old Bath Road;
- Former Premiere Products site on Bouncers Lane, Oakley
- Land adjacent to Longfield, Charlton Kings;
- Land to rear of 291-297 Cirencester Road, Charlton Kings;
- Land Adjacent to Timbercombe Farm, Little Herberts Road, Charlton Kings; and
- John Dower House, 24 Crescent Place, Cheltenham, Gloucestershire, GL50 3RA and South Court.

General suggestions were also made and included the need to integrate housing into town centre developments, focus on brownfield sites that are unoccupied or derelict. Several respondents identified sites around the racecourse as potentially suitable locations for Gypsy, traveller and showpeople communities. Conversely there was opposition to sites being made available in the AONB.

New sites will be included in the next update of the SALA where the panel will examine the availability, suitability and achievability of development over the plan period (to 2031).

**Integrated Appraisal**

A small number of respondents noted and accepted the integrated appraisal scope and reserved detailed comments to the next stage. One respondent stressed the need to follow good practice and develop SA objectives from the objectives of the plan, albeit recognising the process is iterative. The same respondent also highlighted the need to assess policies on different population groups to ensure that discrimination does not take place. These comments will be sent to and be considered by Enfusion.
Cheltenham Plan (Part One): Preferred Options consultation

Introduction
Cheltenham Borough Council published the ‘Cheltenham Plan (Part One) Preferred Options’ document for a six week public consultation in spring 2017. This follows on from the ‘Issues and Options’ consultation in 2015. The consultation opened on Monday 6th February and closed at 5pm on Monday 20th March 2017; businesses, residents and visitors to Cheltenham were invited to submit comments online or in writing.

Several documents, including questionnaires and proposal maps, were distributed to deposit locations across the borough shown on the map below. These documents are also available online (http://consult.cheltenham.gov.uk/consult.ti/cododdo/consultationHome). The questionnaire was based on the economy, local green spaces, and development sites, taking into account responses to the previous ‘Issues and Options’ consultation. Respondents had the opportunity to answer 15 questions and leave additional comments if desired.

All of the proposals from the Preferred Options consultation were presented on an online, interactive map. The wider evidence base which supports the emerging Cheltenham Plan, such as the AONB landscape sensitivity report, was also available to comment upon.

The Preferred Options were available online for comment, using the INOVEM consultation system. Prior to the consultation, 2829 people, organisations, and groups (statutory and non-statutory) were contacted either by email or letter, and invited to take part in the consultation. There were 668 consultees who responded to the questionnaire.

Six weeks prior to the consultation starting the Council advertised the consultation to local stakeholders in line with Gloucestershire compact agreement as set out in the council’s Statement of Community Involvement.

The council also held five public consultation events across the borough. In total around 200 people attended these events. The times and locations are listed below.

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<tr>
<th>Date</th>
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<tr>
<td>16th February 2016</td>
<td>Leckhampton Village Hall</td>
<td>15.00 to 19.00</td>
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<tr>
<td>20th February 2016</td>
<td>Oakley Community Resource Centre</td>
<td>15.00 to 19.00</td>
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<tr>
<td>7th March 2016</td>
<td>Prestbury Library</td>
<td>15.00 to 19.00</td>
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<tr>
<td>11th March 2016</td>
<td>Regents Arcade</td>
<td>10.00 to 15.00</td>
</tr>
<tr>
<td>14th March 2016</td>
<td>Hester’s Way Community Resource Centre</td>
<td>15.00 to 19.00</td>
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Overview
The questionnaire consisted of 15 questions which focussed on preferred policies for the economy, green space, and future development sites. The preferred options were generally met with approval, with over 70% of respondents agreeing with the Vision Themes and Objectives, economic strategy, and employment proposals. Policies protecting the Honeybourne Line and Local Green Spaces (LGS) were well received, whereas proposals for future housing development sites were less popular. See appendix 1 for summary of responses to all questions.

192 postcards were received by respondents supporting the protection of LGS at Leckhampton. The postcard, produced by Leckhampton Green Land Action Group (LEGLAG), asked respondents whether they agreed with the parish council’s proposed LGS boundaries.
Several respondents expressed concerns over proposed housing developments, particularly Reeve’s Field and Prior’s Farm. The JCS strategic allocations in the West and North West of Cheltenham were also commented upon despite the principle of development of these sites being an issue outside the remit of the Cheltenham Plan.

Some respondents felt that parts one and two of the plan should be joined. Part one of the Cheltenham Plan, containing site allocations and an economic strategy, was planned to go through to examination first. The second part would then be prepared and would contain all other policies and fully replace the current Local Plan. Delays to the JCS process has meant that the Cheltenham Plan timetable has been changed since the Preferred Options consultation documents were drafted. We now intend to bring the Cheltenham Plan to be adopted as one cohesive document. So the next consultation will include versions of the policies in the Preferred Options but it will also contain other policies for built environment, environmental protection, amenity space etc.

**Vision & Objectives** (Question 1)

The Vision Themes and Objectives received approval from 76% of respondents. Several consultees who responded ‘no’ when asked whether they agreed with the Vision and Objectives, went on to state in the comments that they actually generally agreed with most of the proposals. Some consultees took issue with Section 2.3 Vision Theme C, stating that the Cotswold Area of Outstanding Natural Beauty (AONB) should be referenced explicitly in this section.

**The Economy** (Questions 2, 3, 4, 5, 6 & 7)

The questionnaire posed several questions on the economy, including whether the public agreed with the proposed Preferred Strategy for the economy. Consultees were also asked to respond to specific economic proposals, regarding designation of employment land, and promoting economic growth.

91% of respondents supported the overall Preferred Strategy for the economy, with requests to ensure that more high-value jobs are created, and that the growth of the employment sector does not negatively affect traffic and parking in the town centre.

Policy EM1, which proposes to safeguard key existing employment land, was very popular with respondents (92%), and several of those who left additional comments cited the need to retain employment land in key areas of the town. Critics of the proposal stated that not enough sites were designated, or that applications on existing employment sites should be judged on their individual merits.

The proposal to safeguard non-designated existing employment land (EM2) was just as popular, receiving approval from 91% of respondents. The comments presented similar themes to the EM1 response, but with consultees highlighting the request to provide housing where employment uses have failed or are underused.

The proposed EM3 policy designates new sites as employment allocations, whilst still popular amongst respondents (75%), several comments raised concern over Grovefield Way. Consultees state that no further incursions into the Green Belt should occur, and that no retail uses are required at this site. The decision to remove this site from the Green Belt is part of the JCS and not the Cheltenham Plan.
Policy EM4, designed to promote a cyber-security sector in Cheltenham, received strong support (93%). Several respondents believe that having a cyber park would give Cheltenham an advantage in attracting high-value jobs in a unique industry.

The protection of the Honeybourne line also proved to be a popular proposal, with 93% of consultees supporting it. However, many comments from both supporters and detractors request for the cycle route to be extended, both into the town centre and in north and south directions. One consultee, Sustrans, proposed an extension to the cycle route northwards to the racecourse.

**Local Green Space (Question 8)**
The consultation put two options forward for Local Green Space (LGS), GE8A and GE8B. Of the two LGS policies, GE8A was clearly preferred over GE8B, with 88% of respondents supporting this option. GE8A consists of designating the following sites as LGS:

- Land at Hesters Way Community Centre
- Land at Lynworth Green
- Land at Albemarle Orchard
- Land at Colesbourne Road and Redgrove Park
- Land at Victoria Cricket Ground
- Land at Fairview Green
- Land at Newcourt Green
- Land at Henley Road and Triscombe Way
- Land at Chargrove Open Space
- Land at Redthorne Way
- Land at Caernarvon Park
- Land at Pilgrove
- Land at Swindon Village
- Land at Leckhampton (indicative area only)

The sites included in GE8A were considered to be demonstrably very special to the local community and suitable for Local Green Space designation. Six of the sites included in GE8A currently benefit from planning protection as Public Green Space. These sites would not usually gain any additional planning protections from LGS designation so an alternative option (GE8B) was included which omitted those six sites.

Certain sites received specific interest from respondents. A parish council proposal for LGS at Leckhampton received significant support, with 192 LEGLAG postcards being submitted. An application for LGS along the A40 received comments, with respondents asking for the plan to recognise the area as a valuable green space. Reeve’s Field, a site belonging to Cheltenham College received suggestions to be allocated as LGS. New suggestions were also made for designations of LGS, which included land off Oakhurst Rise and a verge on Harrington Drive.

**Development Proposals (Question 9 & 10)**
Policies PR1 and PR2 propose allocating sites for residential use or mixed use. Many comments on these policies are from developers promoting specific sites.

Housing allocations proposals were not as popular as other policies in the consultation, with many respondents disagreeing with specific sites.
The Reeve’s Field site, which was proposed for housing, received objections based on the current use of the site as a sports field. Several respondents felt that the allocation contradicted paragraph 74 of the NPPF, which states that land used for sports or recreational purposes should only be built on in special circumstances. Other issues raised include: the location of the site in a conservation area, the potential loss of a green space, the availability of the site for development, key views of the escarpment from the field, and traffic problems which might arise from further housing development.

Objections to Prior’s Farm, a potential mixed use development allocation, also mention the loss of playing fields. Consultees are keen for any development at this site to retain or improve the leisure facilities used by the community.

Despite not being allocated in the plan, many respondents referred to a greenfield site adjoining Oakhurst Rise. Objections were raised to a potential development consisting of 100 houses. Several responses outline the importance of the site as a green space, and the potential loss of wildlife, should the area be developed. Consultees also suggested flood risk and loss of school usage as grounds for objection.

The Preferred Options document included a combined housing and Local Green Space (LGS) allocation at Leckhampton. As aforementioned, the Parish Council’s proposal for green space was very popular. However, the majority of respondents for both the LGS proposals and the housing proposals in Leckhampton objected to the idea of too much housing in the area. Issues raised include: loss of valuable green space, increase in traffic exacerbating congestion issues, strain on local public services, and site location in proximity to the AONB.

A number of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many also referenced the JCS examination and challenged Cheltenham’s housing numbers (objectively assessed housing need).

**Amendments to the Principal Urban Area** (Question 11)

The Preferred Options consultation proposed several amendments to the Principal Urban Area (PUA) in order to better represent the urban boundary of Cheltenham. The proposal was positively received, with 62% of respondents agreeing with the amendments. The objections to the amendments largely focussed on a site called ‘The Hayloft’ in The Reddings. This site had been included within the urban extent of Cheltenham as there has been a building on the site for over 100 years. Despite this, many respondents claimed that the development had taken place without permission, and that by including this site within the PUA the council was validating the development. Some respondents also believed that the PUA extension in this area represented a release of neighbouring green belt land.

Several planning agents, consultants, and developers requested further extensions to the PUA, particularly where their own sites were involved.

**Article 4 Directions** (Questions 12, 13 & 14)

An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority’s area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.
The consultation posed three questions to respondents regarding Article 4 directions. Consultees were asked whether HMO restrictions were required, whether development should be restricted in conservation areas, and whether employment uses being lost to residential should be restricted. A house in multiple occupation (HMO) can be defined in simple terms as a shared residential property where a certain number of occupants are not related to each other and they share basic amenities such as kitchen areas and bathroom facilities. The responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from household development (65%). A slight majority did not want to restrict the loss of office space to residential uses (53%).

From the comments, some respondents think that the St. Paul’s area should have an HMO restriction. Several responses state that there are too many HMOs occupied by students in this area, and more housing should be available for families. The town centre is also mentioned, as the number of HMOs in this area is considered damaging to the infrastructure and character of Cheltenham. Work is ongoing to assess the amount, density and impact of HMOs in the St Pauls and All Saints areas of the town. This will provide information on whether an Article 4 can be justified.

The most popular request for an Article 4 was to restrict harmful household development in conservation areas. Many respondents felt that permitted development rights are harming areas of special character. Whilst the central conservation area was mentioned several times, most responses requested an Article 4 in all of the conservation areas of Cheltenham. A project to update Conservation Area Management Plans is progressing alongside the Cheltenham Plan. As part of this evidence will be gathered to make a case for Article 4 directions.

The majority of respondents did not think that an Article 4 was required to restrict the loss of employment land to residential use. However, most of the respondents who left comments requested that the town centre in particular should not have residential development, in order to protect Cheltenham’s economy.

**Evidence Base (Question 15)**

The final question of the Preferred Options consultation provided consultees with the opportunity to comment on the supporting documents and reports which make up the evidence base for the Cheltenham Plan. Whilst many respondents used this as an opportunity to either comment on the plan as a whole or refer to topics from previous questions, some responses referred to supporting evidence documents, or recommended their inclusion.

The conservation area appraisals were frequently mentioned, with some responses praising the approach, and certain groups requesting to be part of the process. Historic England stated that they wanted to see stronger policies on heritage and conservation, rather than relying on the JCS. Some consultees also suggested moving the conservation area boundary in Prestbury, to include additional fields in the area.

The most frequently mentioned report in the evidence base was the AONB landscape sensitivity report by Ryder Landscape Consultants which received some criticism.

Some statutory consultees requested that the evidence base be expanded, and referred to specific studies which could be included, such as a Strategic Flood Risk Assessment (SFRA), or recommended that certain reports be improved. For example, Sport England suggested that the Green Space Strategy should omit playing fields and sports pitches, as a separate Playing Pitch Strategy and Built Facilities Strategy were in production.
Cheltenham Plan pre-submission (Regulation 18) consultation

Consultation on the pre-submission Cheltenham Plan is scheduled to take place in January and February 2018. Members of the public and stakeholders will be given a period of 8 weeks in which to make comment.

Comments will be invited from all contacts on the Planning Department’s database and copies of the Plan will be made available electronically via the Council’s website and in paper format at the Council’s deposit locations.

Efforts will be made to ensure the public, local businesses, statutory consultees and other stakeholders are aware of the consultation through media releases, engagement with parish and neighbourhood groups, and via Council networks to alert groups to help cascade information. A small number of public consultation events will occur, likely to centre on busy times, which could include displays at the Regent Arcade and Municipal Offices and other locations as used during previous consultation exercises.

Following consultation, the Cheltenham Plan will be formally submitted to the Secretary of State (as the submission plan) along with all representations received as a result of the pre-submission consultation exercise.
Local Plan consultation

Consultation (including internal consultation within the Authority) has been undertaken on the Cheltenham Plan at each of the various stages of preparation and, where appropriate, the comments received have helped shape the plan and its contents. The following illustrates the primary mechanisms and events that have contributed most:

- Planning and Liaison Member Working Group (PLMWG) – a cross party group with a remit to consider and advise on the emerging Cheltenham Plan and provide guidance and feedback to Planning Committee, Cabinet and Council as appropriate. Through regular meetings, the Working Group has had a number of opportunities to comment and shape working drafts of the document. Meetings have also been held with other elected members (not part of PLMWG) and each of the political groups that requested an individual update.

- Internal officer working group - comprising officers from across the Council with a remit to consider, advise and inform the emerging Cheltenham Plan, requesting information from and providing feedback to individual teams as appropriate. This group has had the opportunity to feed into the draft scope, visioning and objectives consultation and has been kept informed on subsequent progress with the plan.

- Liaison with the Strategy and Engagement team to ensure that the Cheltenham Plan aligns with the Corporate Strategy and that consultation responses are elicited as widely as possible across the Borough.

- The Cheltenham Taskforce – regular updates and discussions have taken place between the Taskforce and officers leading the preparation of the Cheltenham Plan.

- Cheltenham’s parishes and communities have been kept up to date on latest developments with the Plan through updates to the regular ‘CS’ and meetings of the Neighbourhood and Community Group Chairs.

- Feedback from the Cheltenham Plan Scoping consultation (July –September 2013).

- Feedback from the Issues and Options Consultation (June – August 2016).

- Feedback from the Preferred Options Consultation (January - February 2017). Approximately 600 comments have been uploaded to the Council website and are summarised by way of a Consultation Report which is also available to view on the website.
Consultee database

The following groups and organisations have been contacted as part of the Cheltenham Plan consultation exercises undertaken since July 2013:

i. Specific consultation bodies

The Town and Country Planning (Local Planning) (England) Regulations 2012 define specific consultation bodies as:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- Network Rail Infrastructure Limited (company number 2904587)
- the Highways Agency
- a relevant authority any part of whose area is in or adjoins the local planning authority’s area
- any person -
  - to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and
  - who owns or controls electronic communications apparatus situated in any part of the local planning authority’s area
- if it exercises functions in any part of the local planning authority’s area -
  - a Primary Care Trust established under section 18 of the National Health Service Act 2006(9) or continued in existence by virtue of that section
  - a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989
  - a person to whom a licence has been granted under section 7(2) of the Gas Act 1986
  - a sewerage undertaker
  - a water undertaker
- The Homes and Communities Agency

For Cheltenham Borough this includes the following:

- Badgeworth Parish Council
- Bishops Cleeve Parish Council
- Boddington Parish Council
- Bredon Parish Council
- Brockworth Parish Council
- Charlton Kings Parish Council
- Coberley Parish Council
- Cotswold District Council
- Dowdeswell Parish Council
- Relevant electricity and gas companies
- English Heritage
- The Environment Agency
- Forest of Dean District Council
- Gloucestershire Clinical Commissioning Group (replaces Primary Care Trust)
- Gloucestershire Constabulary
- Gloucestershire County Council
- Highways Agency
- The Historic Buildings and Monuments Commission for England
- Homes and Communities Agency
- Innsworth Parish Council
- Leckhampton with Warden Hill Parish Council
- Longford Parish Council
- Natural England
- Network Rail
- Prestbury Parish Council
- Severn Trent Water
- Sevenhampton Parish Council
- Shurdington Parish Council
- Southam Parish Council
- Staverton Parish Council
- Stoke Orchard Parish Council
- Stroud District Council
- Swindon Parish Council
- Relevant telecommunications companies
- Tewkesbury Borough Council
- Uckington Parish Council
- Up Hatherley Parish Council
- Whittington Parish Council
- Wiltshire County Council

ii. General consultation bodies

The Regulations define general consultation bodies as:

- voluntary bodies some or all of whose activities benefit any part of the local planning authority’s area
- bodies which represent the interests of different racial, ethnic or national groups in the local planning authority’s area
- bodies which represent the interests of different religious groups in the local planning authority’s area
- bodies which represent the interests of disabled persons in the local planning authority’s area
- bodies which represent the interests of persons carrying on business in the local planning authority’s area

Cheltenham Borough Council’s planning service holds a database of general consultation bodies and others that have registered an interest in planning policy consultations. These include:

- Local and national interest groups including community, activity and faith-based groups
- Residents that have asked to be included in planning policy consultations
• Businesses that have asked to be included in planning policy consultations
• Businesses with a significant presence in the local area
• Government agencies
• Land owners
• Property developers
• Property agents and planning consultancies

In addition to the above, there are many other residents, business owners and stakeholders who have asked to be notified of Cheltenham Plan consultations and their details added to the consultation database. Currently, the database includes contacts for over 2800 individuals and organisations.
## Comments on Issues and Options

<table>
<thead>
<tr>
<th>Topic / Issue</th>
<th>Council response</th>
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<tbody>
<tr>
<td><strong>Vision &amp; Objectives</strong></td>
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<tr>
<td>Two thirds of respondents agreed with the draft vision and objectives</td>
<td>Noted and welcomed</td>
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<td>Some respondents felt the terminology was too generic and did not reflect Cheltenham</td>
<td>Where possible, the Council has made the objectives more locally specific to take account of local distinctiveness</td>
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<tr>
<td>Further refinement of the objectives was suggested along with the introduction of a specific objective protecting the AONB</td>
<td>The objectives were refined wherever possible in order to give a clearer framework for policy development. A specific objective on protecting the AONB has been resisted as this is a requirement of the NPPF and is reflected in the policy content of the JCS and the Cheltenham Plan</td>
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<tr>
<td>It was suggested the objectives should bear a stronger link to the aims and objectives set out in the Joint Core Strategy and might include measurable targets to help measure the degree of success</td>
<td>There is now greater parity between the aims and objectives of the JCS and those of the Cheltenham Plan with the plans providing a coherent and complimentary policy framework. Targets to measure the success of policy will be included in the Cheltenham Plan’s monitoring framework</td>
</tr>
<tr>
<td><strong>Cheltenham Economy</strong></td>
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<tr>
<td>Option 3 was the preferred choice for the majority of respondents</td>
<td>‘Protecting the best and evaluating the rest’ (Option 3) was taken forward as the favoured approach for determining the Plan’s employment strategy</td>
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<tr>
<td>Several respondents quoted NPPF (Para 22) which states that councils should avoid the long-term protection of employment sites where there is no reasonable prospect of a site being used for that purpose</td>
<td>The Council has prepared the Cheltenham Plan to be in accord with the NPPF and has been mindful of Para 22 in formulating the employment strategy including those sites that will be protected and by what means</td>
</tr>
<tr>
<td>Several respondents felt it was not the role of the council to micromanage the local economy; it should be market led with flexible planning policies to support the local economy</td>
<td>The Council has prepared the Cheltenham Plan to be a facilitator of economic development in the Borough having regard to a range of other strategies and initiatives including those of the Cheltenham Taskforce, the GFirst Local Enterprise Partnership, and the JCS.</td>
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<tr>
<td>Many respondents identified the crucial role GCHQ plays in Cheltenham’s economy and the concept of a cyber-security / high technology cluster was well supported</td>
<td>The Council has developed a policy that favours development proposals for businesses which support cyber security activities as part of a coordinated approach to economic development and land management over the plan period.</td>
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<tr>
<td>Some respondents argued the importance of preventing small light-industrial units from</td>
<td>The Council is mindful of the fact that there have been historic changes of use away from</td>
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</table>
changing use to housing | employment uses, principally to housing. The policy framework of the emerging plan adopts a dual-pronged approach to help prevent this trend from continuing in future.

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<tr>
<th>Local Green Space</th>
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| Option 9 was the preferred choice for the majority of respondents | Maintaining existing ‘Public Green Space’ and only allocating ‘Local Green Space’ that meets the framework’s criteria (Option 9) was taken forward as the favoured approach for addressing Local Green Space.

| The vast majority of comments relating to the LGS sites advanced in the plan were in support although levels of support varied considerably from site to site. Several new sites were also suggested | Noted. Newly suggested sites have been incorporated into the plan where they meet the criteria for the designation of LGS.

| Several land owners were concerned that Local Green Space should not be used to undermine the aims of identifying sufficient land at suitable locations to meet identified development needs | The Council acknowledges that Public Green Space and Local Green Space are extremely important to the local community and the number of LGS designations included in the emerging plan reflects this stance. The designation of LGS has not compromised the ability of the plan to make sufficient allocations for residential, employment and mixed-use development as all identified needs are being met either in the JCS or the Cheltenham Plan itself.

<table>
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<tr>
<th>Development Sites</th>
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| Whilst JCS urban extensions sites did not feature in this consultation, many respondents used this as an opportunity to object to these allocations | Inappropriate comments have been discarded as necessary.

| Some respondents recognised greenfield sites adjoining the Principal Urban Area (PUA) may be required to meet the challenging housing requirement, although this should only occur once all brownfield sites have been developed | The plan has attempts to strike a balance between brownfield allocations and greenfield allocations adjoining the PUA. However, it should be noted that most greenfield allocations are either embodied within or result from the strategy of the JCS.

| There was a high level of objection to the suggested allocation of the site at Glenfall Way | The site was not taken forward in the Plan.

| Most respondents were not in favour of development at Priors Farm and stressed the need to protect the land for the benefit of the local community | This site was taken forward to the next stage as a low density, mixed-use development option which required careful master-planning to reconcile several competing demands.

| Most respondents supported housing and mixed-use development on North Place and Portland Street subject to integration with the townscape in this part of Cheltenham | Noted. This site was taken forward to the next stage of plan preparation having regard to community feedback and the fact that the site benefited from extant planning consent.

| Several new sites and development locations were promoted and suggested during the consultation | New sites were examined according to the availability, suitability and achievability of development over the plan period. Where |
| More general suggestions referred to the need to integrate housing into town centre developments and focus on brownfield sites that are unoccupied or derelict | The comments are noted and have formed one of the guiding principles in the preparation of the plan with allocations being made in accord with those priorities wherever possible |
# Comments on Preferred Options

<table>
<thead>
<tr>
<th>Topic / Issue</th>
<th>Council response</th>
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<tbody>
<tr>
<td><strong>Vision &amp; Objectives</strong></td>
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<tr>
<td>The vision and objectives were largely supported at this stage although some consultees continued to request that the AONB be referenced specifically in this section.</td>
<td>A specific objective on protecting the AONB has been resisted as this is a requirement of the NPPF and is reflected in the policy content of the JCS and the Cheltenham Plan.</td>
</tr>
<tr>
<td><strong>The Economy</strong></td>
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<tr>
<td>91% of respondents supported the overall Preferred Strategy for the economy.</td>
<td>Noted and welcomed.</td>
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<tr>
<td>Policy EM1, which proposes to safeguard key existing employment land, was very popular with respondents, achieving s 92% approval rating.</td>
<td>Noted and welcomed.</td>
</tr>
<tr>
<td>Some critics of the policy stated that not enough key sites were designated, whilst others stated that applications on existing employment sites should be judged on their individual merits rather than on a blanket designation.</td>
<td>The methodology for identifying key sites focusses on particular criteria as set out in the Preferred Options. The identification of sites is accompanied by a criteria-based policy that facilitates the assessment of development proposals for changes of use away from employment.</td>
</tr>
<tr>
<td>The proposal to safeguard non-designated existing employment land (Policy EM2) was just as popular, receiving approval from 91% of respondents.</td>
<td>Noted and welcomed.</td>
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<tr>
<td>Some respondents made a request for the plan to provide housing where employment uses have failed or are underused.</td>
<td>Policies EM1 and EM2 allow the assessment of proposals with changes of use from employment being allowed in certain circumstances subject to the applicant providing sufficient evidence to help justify that change.</td>
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<tr>
<td>Whilst still popular amongst respondents (75% approval rating), several comments raised concern over the Grovefield Way employment allocation (Policy EM3) with consultees stating that no further incursions into the Green Belt should occur.</td>
<td>The history of Grovefield Way is a long and complex one. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy will remove the Green Belt designation here and, as part of the site already benefits from extant planning consent for B1 uses, its allocation for much needed employment use is logical and in accord with the broader strategy of the Cheltenham Plan.</td>
</tr>
<tr>
<td>Policy EM4, designed to promote a cybersecurity sector in Cheltenham, received strong support (93% approval rating). Several respondents believe that having a cyber park would give Cheltenham an advantage in attracting high-value jobs in a unique industry.</td>
<td>Noted and welcomed.</td>
</tr>
<tr>
<td>The protection of the former Honeybourne</td>
<td>Noted and welcomed. Connecting spurs/routes</td>
</tr>
</tbody>
</table>
Railway Line via Policy EM5 line also proved to be a popular proposal, with 93% of consultees supporting it. However, many comments from both supporters and objectors requested that the cycle route to be extended, both into the town centre and in northerly and southerly directions. will be added to the Cheltenham Plan Proposals Map where there is sufficient evidence to justify their inclusion as protected routes.

<table>
<thead>
<tr>
<th>Local Green Space</th>
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<tbody>
<tr>
<td>88% of respondents supported the more ambitious option to designate 14 areas of Local Green Space including 6 areas already designated as Public Green Space (Policy GE8A) Noted and welcomed. The Cheltenham Plan is also taking forward existing Public Green Space designations (a forerunner of LGS that was brought forward in the adopted 2006 Borough Local Plan) as Local Green Space. This is to avoid creating a two-tier system of protection that could have caused confusion.</td>
</tr>
<tr>
<td>A Parish Council proposal for LGS at Leckhampton received significant support with 192 representations being submitted in total. The Parish Council’s suggestion has been taken on board and features as an integral part of the Cheltenham Plan’s proposals for Leckhampton.</td>
</tr>
<tr>
<td>Other LGS suggestions were received in respect of land at Reeve’s Field; the highway verge along the A40 at Benhall; land off Oakhurst Rise; and a verge at Harrington Drive. The Harrington Drive LGS proposal has been taken forward in the Plan. The remaining LGS proposals either conflict with development proposals in the Plan or are inappropriate for designation and have been omitted.</td>
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<tr>
<th>Development Proposals</th>
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<tr>
<td>Policies PR1 and PR2 proposing housing and mixed use allocations were not as popular as other policies in this consultation with many respondents disagreeing with the allocation of specific sites. Particular attention focussed on Reeve’s Field and Prior’s Farm both of which have current uses as sports / playing fields. Both Reeve’s Field and Prior’s Farm Fields continue to feature in the Cheltenham Plan as part of the wider strategy for sustainable development. Both allocations recognise the importance of master-planning as an important means of reconciling any competing demands / interests across the wider area and both allocations propose the retention of large areas of green space.</td>
</tr>
<tr>
<td>An indicative proposal for housing and Local Green Space at Leckhampton received general acceptance provided that the number of new homes provided was not too high. Noted. The number of new homes being accommodated at Leckhampton reflects discussions that took place as part of the JCS process and the fact that Leckhampton was cascaded from that process as a non-strategic site.</td>
</tr>
<tr>
<td>Planning agents focused on the need to boost the supply of housing in Cheltenham and advanced strategic and site-specific evidence on behalf of their respective clients. The sites put forward through the JCS and Cheltenham Plan combine to meet the Borough’s Objectively Assessed Housing Need up to 2031. Some Cheltenham Plan allocations reflect submissions to the Council as part of the SALA process and / or the Cheltenham Plan call for sites where inclusion of those sites would assist in the establishment of a strategy for sustainable development.</td>
</tr>
</tbody>
</table>
### Amendments to the Principal Urban Area (PUA)

<table>
<thead>
<tr>
<th>62% of respondents supported the proposed amendments.</th>
<th>Noted. The vast majority of PUA amendments reflect development that has already been undertaken following the granting of planning permission.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most of the objections related to a single property in The Reddings.</td>
<td>The property concerned is long-established and amendment to the boundary at this location corrects a historic omission from the PUA.</td>
</tr>
</tbody>
</table>

### Article 4 Directions

<table>
<thead>
<tr>
<th>Some respondents consider that the St. Paul’s area should have an HMO restriction as there are too many HMOs occupied by students and more housing should be available for families.</th>
<th>The Cheltenham Plan has introduced a policy on Houses in Multiple Occupation which facilitates the assessment of planning proposals for HMOs in St. Pauls ward according to a number of clearly defined criteria.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The number of HMOs in the town centre area is considered damaging to the infrastructure and character of Cheltenham by some.</td>
<td>See above. St. Pauls is one of the wards that comprise the town centre.</td>
</tr>
<tr>
<td>Overall, responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from householder development (65%).</td>
<td>The Council has introduced Policy HM5 to the Cheltenham Plan to help address the high proliferation of HMOs in St Pauls. The Council will consider introducing Article 4 directions in Conservation Areas subject to the findings of the relevant conservation area reviews / re-appraisals and the recommendations included in any resulting Conservation Area Management Plans.</td>
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</tbody>
</table>
Cheltenham Plan Scoping Questionnaire

Work has begun on the new Cheltenham Plan and we want to hear your views on what the plan should contain. Before completing this feedback form we suggest you read the Cheltenham Plan Scoping Document.

Contact details:
Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email.

<table>
<thead>
<tr>
<th>Title (Mr, Mrs, Ms, Miss, Other)</th>
<th>Name</th>
<th>Organisation (if relevant)</th>
<th>Job Title (if relevant)</th>
<th>Address</th>
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Agent Details:
If you are acting on behalf of another person or organisation, please provide your details here.

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<tr>
<th>Title (Mr, Mrs, Ms, Miss, Other)</th>
<th>Name</th>
<th>Organisation (if relevant)</th>
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</table>
1. Do you have any comments on the timetabling for producing the Cheltenham Plan?

Please see Process & Timetable section within Scoping Document

2. Do you have any comments on the current corporate vision and JCS vision and how they should relate to Cheltenham?

3. Please tell us *your* vision for Cheltenham

4. What do you think about the idea of a themed vision?

5. Name one thing in Cheltenham that you like

6. Name one thing in Cheltenham you think needs to change
7. Below is a list of objectives compiled from the existing Local Plan. Please indicate how important you think each of these objectives is (please cross one box for each objective):

<table>
<thead>
<tr>
<th></th>
<th>No View</th>
<th>Not Very Important</th>
<th>Quite Important</th>
<th>Very Important</th>
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</thead>
<tbody>
<tr>
<td>To achieve a high standard of design in new development</td>
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<tr>
<td>To reduce crime and the fear of crime</td>
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<td>To make provision for identified development needs</td>
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<td>To create more sustainable patterns of development, with priority use of previously-developed land</td>
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<td>To meet the needs of the elderly and people with disabilities</td>
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<td>To conserve and improve Cheltenham’s architectural townscape and historical heritage</td>
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<tr>
<td>To conserve and improve Cheltenham’s landscape character and green environment</td>
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<td>To prevent coalescence of Cheltenham with other settlements</td>
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<td>To reduce waste and energy consumption and conserve natural resources</td>
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<td>To maintain and enhance the economic vitality of the borough</td>
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<tr>
<td>To safeguard land and buildings in existing employment use, or if unoccupied, last in employment use</td>
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<td>To meet housing requirements, including the need for affordable housing</td>
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<td>To maintain and enhance the vitality and viability of the town centre as a sub-regional shopping centre</td>
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<tr>
<td>To increase the range of facilities for recreation and leisure</td>
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<td>To encourage provision of a range of facilities and attractions for tourists</td>
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<tr>
<td>To encourage the retention and provision of a range of community facilities and services</td>
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<tr>
<td>To promote sustainable transport</td>
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<tr>
<td>To ensure infrastructure in development is provided to a satisfactory standard</td>
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8. Are there any other objectives that you would suggest?
9. How can we make the objectives more specific to Cheltenham?

The Scoping Document includes a list of policy areas that we think the Cheltenham Plan needs to cover

Please see Potential Policy Areas within the Scoping Document for full list

10. Do you think we have missed anything?

11. Do you have any suggestions, specific to Cheltenham, for how we should develop these policy areas?

It is Important that the objectives and policies of the plan can be delivered, in other words actually provided, protected or built.

12. What do you think are the key considerations in ensuring that our plan is deliverable?
COMMENTS:

13. If you have any further comments, please write them below:

[Blank space for comments]

14. How did you hear about the Cheltenham Plan Scoping Consultation?

- Website
- Email
- Social media
- Advertising/display
- Library
- Word of mouth
- Database contact
- Other: ..............................................

Thank you for submitting your response for the Cheltenham Plan Scoping Consultation

To keep up to date with the Cheltenham Plan, please visit www.cheltenham.gov.uk/localplan
Cheltenham Plan Issues and Options

Questionnaire

Work has begun on the new Cheltenham Plan and we want to hear your views on the Issues and Options document. Before completing this feedback form we recommend that you read the Cheltenham Plan Issues and Options Document. This can be found at www.consult.cheltenham.gov.uk

Contact details:

Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email.

Agent Details:

If you are acting on behalf of another person or organisation, please provide your details here.

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<th>Name</th>
<th>Organisation (if relevant)</th>
<th>Job Title (if relevant)</th>
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Return no later than 5pm on Monday 3\textsuperscript{rd} August 2015 to:

**POSTAL ADDRESS:** Planning Policy, Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham, GL50 9SA; or

**EMAIL:** localplan@cheltenham.gov.uk

**Q1:** Do you agree with the draft vision themes and objectives?

Please select one option.

| YES | NO |

**Q1a:** Please state your reasons why.

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**Q2:** Are there any vision themes and objectives which you feel have been missed and should be added?

Please select one option.

| YES | NO |

**Q2a:** Please state your reasons why.

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**Q3:** Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

| YES | NO |
Q3a: Please state your reasons why.
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Q4: Does this policy approach address the identified issues?

Please select one option.

| YES | NO |

Q4a: Please state your reasons why.
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Q5: Which policy option do you support?

Please select one option.

☐ OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2

☐ OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development

☐ OPTION 3: Protect the best and evaluate the rest

☐ OTHER OPTION

Q5a: Please state your reasons why.
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Q6: Are there any issues and/or options which have been missed that you feel should be added?

Q7: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

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<th>YES</th>
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Q7a: Please state your reasons why.

Q8: If you support a safeguarding approach, which employment sites do you think should safeguarded for employment use? Please refer to the employment map(s).

Q9: Does this policy approach address the identified issues?

Please select one option.

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<th>YES</th>
<th>NO</th>
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Q9a: Please state your reasons.
Q10: Which policy option do you support?

Please select one option.

☐ OPTION 4: Introduce selective management of Cheltenham’s economy

☐ OPTION 5: No policy intervention

☐ OTHER OPTION

Q10a: Please state your reasons why.
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Q11: Are there sectors that you think should be promoted ahead of others?
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Q12: Are there any issues and/or options which have been missed that you feel should be added?
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Q13: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

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Q13a: Please state your reasons why.
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Q14: Does this policy approach address the identified issues?

Please select one option.

| YES | NO |

Q14a: Please state your reasons why.
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Q15: Which policy option do you support?

Please select one option.

☐ OPTION 6: Introduce a cyber security cluster

☐ OPTION 7: Do not promote cluster development

☐ OTHER OPTION

Q15a: Please state your reasons why.
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Q16: Do you agree the Cheltenham Plan should promote a cyber security cluster?

Please select one option.

| YES | NO |
Q16a: Please state your reasons why.

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Q17: Do you think the Cheltenham Plan should promote other clusters alongside cyber security cluster?

Please select one option.

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Q17a: Please state your reasons why.

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Q18: Are there any issues and/or options which have been missed that you feel should be added?

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Q19: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

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Q19a: Please state your reasons why.

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Q20: Does this policy approach address the identified issues?

Please select one option.

| YES | NO |

Q20a: Please state you reasons why.

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Q21: Which policy option do you support?

Please select one option.

☐ OPTION 8: Allocate all designated ‘Public Green Spaces’ as ‘Local Green Spaces’

☐ OPTION 9: Maintain existing local ‘Public Green Spaces’ and only allocate ‘Local Green Spaces’ that meet the Framework’s criteria

☐ OPTION 10: Maintain existing approach of designating local ‘Public Green Spaces’

☐ OTHER OPTION

Q21a: Please state your reasons why.

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Q22: Which areas (including sites identified on the Local Green Space Map) do you think should be designated a Local Green Space? Please state you reasons why.

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Q23: Are there any issues and/or options which have been missed that you feel should be added?

Q24: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

| YES | NO |

Q24a: Please state your reasons why.

Q25: Should the Cheltenham Plan designate the Honeybourne Line as a Local Green Space (as opposed to its current designation, Public Green Space, in the adopted Local Plan)?

Please select one option.

| YES | NO |

Q25a: Please state you reasons why.

Q26: Do you agree the Honeybourne Line should continue to be protected for future transport schemes?

Please select one option.

| YES | NO |
Q26a: Please state you reasons why.
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Q27: Do you agree that the sites that have been coloured ‘green’ on the housing maps represent the most suitable to consider allocating for future housing development?

Please select one option.

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Q27a: Please state you reasons why.
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Q27b: If no, which sites coloured green on the housing map do you disagree with and why? Please state the site reference and your reason.
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Q28: Do you think a site that is not coloured ‘green’ on the housing maps should have been?

Please select one option.

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Q28a: Please state the site reference and your reason.
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Q29: Do you agree that the sites that have been coloured ‘amber’ on the housing maps represent potential for allocating for future housing development?

Please select one option.

| YES | NO |

Q29a: Please state you reasons why.

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Q29b: If no, which sites coloured 'amber' on the housing map do you disagree with and why? Please state the site reference and your reason.

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Q30: Do you think a site that is not coloured ‘amber’ on the housing maps should have been?

Please select one option.

| YES | NO |

Q30a: Please state the site reference and your reasons why.

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Q31: Do you agree that the sites that have been coloured ‘red’ on the housing maps are not suitable for allocation for future housing development?

Please select one option.

| YES | NO |
Q31a: Please state your reasons why.

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Q31b: If no, which sites coloured red on the housing maps do you disagree with? Please state the site reference and your reason.

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Q32: Do you think there are any other sites which should be coloured red on the housing maps?

Please select one option.

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<th>YES</th>
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Q32a: Please state the site reference and your reasons why.

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Q33: Do you think there are other more suitable sites not shown on the maps that could be considered as future housing allocations?

Please select one option.

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Q33a: If so, please supply details such as an address and a site plan.

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Q34: Do you think that any sites being considered in this area could be suitable for gypsy, traveller and travelling showpeople site use?

Please select one option.

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Q34a: Please state your reasons and list site references of any specific sites.

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Q35: Do you think there are other more suitable sites for gypsy, traveller and travelling showpeople not shown on the maps that could be considered for future use?

Please select one option.

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Q35a: If so, please supply details such as an address and a site plan.

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Q36: Which, if any existing employment site/s (sites coloured brown on the employment maps) should or should not be safeguarded from change of use? Please state the reference, your preference and give your reasons why.

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Q37: Do you agree that the sites that have been coloured ‘green’ on the employment maps represent the most suitable to consider allocating for future employment development?

Please select one option.

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<th>YES</th>
<th>NO</th>
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Q37a: Please state your reasons why.
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Q37b: If no, which sites coloured green on the employment maps do you disagree with and why? Please state the site reference and your reason.
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Q38: Do you think a site that is not coloured ‘green’ on the employment maps should have been?

Please select one option.

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Q38a: Please state the site reference and your reasons why.
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Q39: Do you agree that the sites that have been coloured ‘amber’ on the employment maps represent potential for allocating for future employment development?

Please select one option.

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Q39a: Please state your reasons why.
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Q39b: If no, which sites coloured amber on the employment maps do you disagree with and why? Please state the site reference and your reasons why.

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Q40: Do you think a site that is not coloured ‘amber’ on the employment maps should have been?

Please select one option.

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Q40a: If so, please state the site reference and your reasons why.

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Q41: Do you agree that the sites that have been coloured ‘red’ on the employment maps are not suitable for allocation for future employment development?

Please select one option.

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Q41a: Please state your reasons why.

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Q41b: If no, which sites coloured red on the employment maps do you disagree with? Please state the site reference and your reason.

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Q42: Do you think there are any other sites which should be coloured red on the employment maps?

Please select one option.

| YES | NO |

Q42a: Please state the site reference and your reasons why.

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Q43: Do you think there are other more suitable sites not shown on the maps that could be considered as future employment allocations?

Please select one option.

| YES | NO |

Q43a: If so, please supply details such as an address and a site plan.

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Q44: Please provide details of any further comments you wish to make.

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How did you hear about the Cheltenham Plan Issues and Options Consultation?

- Website
- Email
- Social media
- Advertising/display
- Library
- Word of mouth
- Database contact
- Other: ................................................

Thank you for submitting your response for the Cheltenham Plan Issues and Options Consultation.

To keep up to date with the Cheltenham Plan, please visit www.cheltenham.gov.uk/cheltenhamplan
Contact details:

Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email. If you are acting on behalf of another person or organisation, please leave your details here.

Title (Mr, Mrs, Ms, Miss, Other)

Name

Organisation (if relevant)

Job Title (if relevant)

Address

Postcode

Telephone

Email
The purpose of this consultation is to hear your views on the Cheltenham Plan. The consultation document provides the Council’s preferred options for the future Plan and includes a set of questions for you to answer.

This consultation is in addition to those which are required by Government policy. The Council has decided that it is important to get feedback on the Cheltenham Plan at an early stage in the process. This will allow officers to work towards a final draft Plan which has the support and input of the local community, stakeholders and statutory bodies.

Each question is followed by a text box should you wish to leave additional comments after your responses. If you require more space then please attach additional sheets at the end of this document, with reference to the question number.

**Question 1**

Do you agree with the Vision Themes and Objectives? (page 5)

Yes ☐ No ☐

Please enter any additional comments below.

||
Question 2
Do you agree with the Preferred Strategy for the economy? (page 14)
Yes ☐  No ☐

Please enter any additional comments below.


Question 3
Do you agree with Proposed Policy EM1 Safeguarding Key Existing Employment Land and Buildings? (see Appendix A, Proposals Map, and Site Maps) (page 21)
Yes ☐  No ☐

Please enter any additional comments below.


**Question 4**

Do you agree with Proposed Policy EM2 Safeguarding Non-Designated Existing Employment Land and Buildings? (page 24)

Yes ☐ No ☐

Please enter any additional comments below.


**Question 5**

Do you agree with Proposed Policy EM3 New Employment Allocations? (see Proposals Map and Site Maps) (page 27)

Yes ☐ No ☐

Please enter any additional comments below.


**Question 6**
Do you agree with Proposed Policy EM4 Promoting the Cyber-Security Sector? (page 29)

Yes ☐   No ☐

Please enter any additional comments below.

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Question 7

Do you agree with Proposed Policy EM5 Protecting the Route of the Former Honeybourne Rail Line? (see Proposals Map) (page 30)

Yes ☐   No ☐

Please enter any additional comments below.

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Question 8
Do you agree with Proposed Policy GE8A or GE8B Local Green Space? (see Appendix B, Appendix C, Proposals Map, and site maps) (page 34-35)

GE8A ☐   GE8B ☒

Please enter any additional comments below.

Question 9

Do you agree with Proposed Policy PR1 Land Allocated for Housing Development? (see Appendix D, Appendix E, Proposals Map, and site maps) (page 41)

Yes ☐   No ☐

Please enter any additional comments below.

Note

If you know of a site which is suitable for housing development and should be included in the Cheltenham Plan please submit information via the ‘Call for Sites’ form.

Question 10
Do you agree with Proposed Policy PR2 Land Allocated for Mixed Use Development? (see Appendix B, Appendix E, Proposals Map, and site maps) (page 44)

Yes ☐ No ☐

Please enter any additional comments below.

Note

If you know of a site which is suitable for mixed use development and should be included in the Cheltenham Plan please submit information via the 'Call for Sites' form.
**Question 11**

Do you agree with the preferred options for minor amendments to the Principal Urban Area? (see Appendix F, Proposals Map, and site maps) (page 46-47)

Yes ☐ No ☐

Please enter any additional comments below.


**Question 12**

Do you think that an Article 4 direction to restrict HMOs is required in any part of the Borough? (page 48-50)

Yes ☐ No ☐

Please enter any additional comments below.


**Question 13**

Do you think that an Article 4 direction in any Conservation Area is required to stop the erosion of its special character through householder development in any part of the Borough? (page 48-52)

Yes ☐ No ☐

Please enter any additional comments below.


**Question 14**

Do you think that an Article 4 direction to restrict the loss of office or employment uses to residential is required in any part of the Borough? (page 48-50)

Yes ☐ No ☐

Please enter any additional comments below.


Question 15

If you have any comments on the Cheltenham Plan evidence base please enter them below.

Thank you for completing the Preferred Options questionnaire. To submit, please email this document to localplan@cheltenham.gov.uk.

Alternatively, this document can be posted to the following address:

Planning Policy
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

If you have any questions or problems please contact the Planning Policy team using the above details or telephone on 01242 264328.