

<b>APPLICATION NO: 25/00577/FUL</b>		<b>OFFICER: Mr Ben Warren</b>	
<b>DATE REGISTERED:</b> 7th April 2025		<b>DATE OF EXPIRY :</b> 7th July 2025	
<b>WARD:</b> Lansdown		<b>PARISH:</b>	
<b>APPLICANT:</b>	Miss Hannah Ward Cheltenham Borough Council		
<b>LOCATION:</b>	Imperial Garden Promenade Cheltenham		
<b>PROPOSAL:</b>	Erection of temporary structures in connection with festivals and special events including an ice rink in Imperial Gardens for a maximum of 75 days for 3 periods being 2025/2026, 2026/2027, 2027/2028 (November-January ) inclusive of rig and de-rig. This is in addition to the current planning permissions for festivals and special events on Montpellier Gardens and Imperial Gardens. (Re-submission of planning permission 22/01200/FUL).		

## REPRESENTATIONS

Number of contributors	<b>2</b>
Number of objections	<b>2</b>
Number of representations	<b>0</b>
Number of supporting	<b>0</b>

36D The Broad Walk  
Imperial Square  
Cheltenham  
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GL50 1QG

### Comments: 24th April 2025

In 2012 CBC made a commitment to install permanent power supplies to Montpellier and Imperial Gardens. Seven applications, three cancelled and three completed Ice Rinks later we still have no permanent supplies.

The Planning Committee has on more than one occasion permitted applications for the ice rink with limited time scales on the understanding that permanent power supplies were on the horizon. It would seem they are not.

We now have this application 25/00577/FUL. 13 years on from the initial statement and still no Permanent Power Supplies.

This application is for three years and includes a letter from the director of finance & assets who apparently has grave reservations about a dedicated supply to Imperial Gardens. Why is it even in the pack? The subliminal message seems to be "you are not getting a supply to the gardens but that's OK because HVO is the answer" Well, the truth is, it is not. It was never an alternative, just a convenient stop gap.

This application is light on technical detail concerning the generator and battery pack. "The rink operates using a high-capacity battery system supported by the park's mains electrical feed. A highly efficient, silenced diesel generator is also required but throughout

this project the generator will run exclusively on certified, sustainably sourced Hydrotreated Vegetable Oil (HVO)". No reference to the generator category or emissions. Conveniently, stating "All plant will be subject to procurement exercises which cannot take place without permission from the planning authority, so model spec sheets cannot be provided at the time of writing" avoids identifying the fact that the battery pack will weigh 10 tonnes.

The applications Climate Impact Report (CIAT) is misleading, using questionable data and portraying estimates as fact. The Local Economy and Jobs section is cut and paste from the Ice Rink Report but without the warning that due to the poor response to the survey of just under 1% "means that the data must be treated with appropriate caution". No such caution is used in the compilation of this section. There is not a single reference to the data being estimated. It also omits the one indisputable fact, that the event lost £64,000.

The GHG emission claims are incredibly naive and therefore meaningless. Likewise, the Air Quality section. The data referring to HVO emissions is simply false. I have pointed out over the last four years that the claims made about the benefits are based entirely on theoretical models and I have identified and shared numerous studies and articles that identify the reality of HVO production and its less than reliable certification processes. I also pointed out the effect of HVO on local air quality. CBC have chosen to ignore this significant evidence and rather go with the suppliers theoretical marketing literature. The most recent article from the BBC "UK investigating claims green fuel contains virgin palm oil" was published 9 April 2025, the same week this application was made.

I urge you to read this article:

<https://www.bbc.co.uk/news/articles/cm24n8nej94o>

If you would like to study the original report commissioned by the Netherlands Government and quoted in the BBC report, then use this link:

<https://www.government.nl/documents/reports/2025/03/06/effects-of-hvo-on-pollutant-emissions-of-stage-v-non-road-diesel-engines>

An extract from this report sums it up "The figures show that the UK and EU used about two million tonnes of palm sludge waste for HVO and other biofuels in 2023, based on Eurostat and UK Department for Transport figures. But the data based on well-established UN and industry statistics, suggests the world can only produce just over one million tonnes of palm sludge waste a year".

The Climate Impact Report (CIAT) also claims the impact of the event in Imperial Gardens was barely discernible, which is also incorrect. I am sure you will have noticed the extensive pooling of water in Imperial Gardens during January and February. Several of the flower beds could not be replanted due to waterlogging and it was March before the final two beds were replanted, two months after the event and five months after the beds were emptied. Although the single event in 2024/25 did not on its own cause the compaction it is the continual use of the gardens for events and rotovating to the same depth that causes the compaction (as stated by the Green Space Manager). Using a 10-tonne battery pack, transported over the gardens on an articulated lorry along with a generator (total weight more than 20 tonnes) clearly contributes to the compaction problem. I believe plans to address the compaction problem are in place but as yet it is unresolved.

HVO causes deforestation and destruction of wildlife habitats.

HVO creates local air pollution.

I think it is time to draw a line under this and reject this application.  
No Power Supplies - No Ice Rink.

23 Imperial Square  
Cheltenham  
Gloucestershire  
GL50 1QZ

**Comments:** 22nd April 2025

Dear Planning Officer,

I am writing to formally object to Planning Application 25/00577/FUL, which seeks permission for the erection of temporary structures in connection with festivals and special events including an ice rink in Imperial Gardens, for a maximum of 75 days over three periods from 2025 to 2028.

While I appreciate the desire to create a festive atmosphere and encourage winter footfall in town, I believe this particular application raises serious concerns, which I urge the Planning Committee to consider carefully.

#### 1. Unreliable Economic Impact Claims

CBC has cited significant economic returns from previous installations of the ice rink. However, the data underpinning these claims originates from a survey with a response rate of under 1%, a figure so low that the authors of the report themselves caution against drawing firm conclusions. Despite this, CBC has presented these estimates as fact-for example, stating that £1.6m was spent in Cheltenham by ice rink visitors, with £530,000 being additional.

This data is not only statistically weak, but also misleading, as it fails to factor in the expenditure that would likely have occurred in town regardless of the rink. The use of such unreliable figures undermines the credibility of the entire economic argument.

#### 2. Use of Public Funds and Transparency

The reported cost of £64,000 to Cheltenham residents-offset by a £40,000 grant from the UK Shared Prosperity Fund-is concerning. This is public money that could have supported more enduring, community-benefiting initiatives. Presenting the net figure of £24,000 as the actual cost in ROI calculations constitutes creative accounting and clouds transparency in public finance.

While financial concerns may not fall strictly within the remit of the Planning Committee, the failure to properly address these issues reflects a wider governance issue that residents should be entitled to question.

#### 3. Lack of Permanent Infrastructure and Environmental Impact

Despite a 2012 commitment by CBC to install permanent power supplies in the gardens, none exist as of 2025. This has direct consequences: temporary power solutions require generators that rely on HVO fuel. Claims that HVO drastically reduces harmful emissions are questionable.

The application states that HVO results in a 30% reduction in NOx and an 85% reduction in PM compared to diesel, but no sources are cited. Independent research commissioned by the Dutch Government contradicts these figures, indicating minimal difference when Stage V generators (such as those used previously) are involved.

This application effectively treats HVO as a long-term solution, when it was only ever intended as a stopgap. Generator use-regardless of fuel-has a known negative impact on local air quality, which is especially concerning in a residential and public green space like Imperial Gardens.

#### 4. Damage to Green Spaces and Misleading Statements

The Climate Impact Report makes inaccurate claims about garden restoration. It states that flower beds were replanted in early February "regardless of whether the rink takes place or not," yet historically these beds were planted in November-a practice that had to be deferred solely due to the rink.

In 2024/25, two beds were still unreplanted by March due to waterlogging and compaction. The repeated use of heavy vehicles-some exceeding 20 tonnes-over soft garden grounds is not sustainable. The cumulative effect of seasonal events and repeated rotovating is acknowledged by CBC's own Green Space Manager as a key cause of compaction, which remains unresolved.

To claim that "the impact of the event was barely discernible" is demonstrably false.

#### 5. Planning Precedent and Overuse of Imperial Gardens

Granting another three-year application continues a pattern of incremental, cumulative impact on the gardens. Imperial Gardens is a much-loved public space, not a commercial event site. Overuse diminishes its ecological, social, and aesthetic value.

The Planning Committee must consider whether continued seasonal intensification is compatible with the long-term wellbeing of this civic space.

6. Noise Pollution: We live around Imperial square and this event creates continual noise through the day and into the night with both music and the noise of generators.

#### Conclusion

For the reasons outlined-questionable data, suboptimal use of public funds, lack of promised infrastructure, environmental degradation, and misleading information within the application-I respectfully request that this application be refused. Imperial Gardens is an asset to Cheltenham and should not be degraded by a seasonal event which is not in keeping with the surroundings or effective for Cheltenham.

Yours faithfully,