



Index of Buildings of Local Interest Supplementary Planning Document

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Index of Buildings of Local Interest SPD

Preface

This supplementary planning document (SPD) provides advice and guidance to owners and occupiers of buildings included on the Borough's *Index of Buildings of Local Interest*. It explains why the *Index* is needed, national and local policy background, the criteria for selection of buildings of local importance and the effects of inclusion on the *Index*. There is also a brief explanation of the use of an Article 4 Direction to control demolition of certain buildings on the *Index*. This document needs to be read in conjunction with the *Index* – which can be viewed at www.cheltenham.gov.uk.

This SPD was adopted on 28th June 2007. It will be used as a material consideration in the determination of planning and related applications. It has also been drafted in order to give best practice advice on issues which are beyond planning control in order to encourage high quality design and conservation solutions.

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1 Introduction

- 1.1 Central Government guidance indicates that it is open to planning authorities to prepare lists of locally important buildings and structures, and to formulate policies for their protection, whilst making it clear that they do not enjoy the full protection of statutory listing.
- 1.2 The Council has prepared an Index of Buildings of Local Interest and will seek their retention and enhancement. The Index does not alter any planning legislation affecting the buildings on it and permitted development rights remain unchanged. However, where there is a threat to a building, the Council will consider seeking Article 4 Directions or spot listing to protect it.

2 The Need for an Index

- 2.1 Cheltenham is the most complete Regency town in England and one of the few English towns in which traditional and contemporary architecture complement each other.
- 2.2 Unsurprisingly, therefore, there are many buildings of architectural and historic merit. 2,540 of these buildings have been statutorily listed by the Department for Culture, Media and Sport advised by English Heritage. Listing gives a building statutory protection against unauthorised demolition, alteration and extension.
- 2.3 There are, however, many buildings that do not meet the strict criteria for statutory listing but still make a special local contribution to the history, appearance, character and cultural value of Cheltenham. The Index contains about 450 buildings and structures that are valued by the community for these reasons.
- 2.4 In recent years a number of locally valued buildings have been demolished so that their sites can be more intensively developed. Others have had important features lost or removed through ill-considered alterations. By compiling the *Index*, the Council aims to protect buildings of local importance from insensitive alteration and demolition through the use of powers available under the Planning Acts. Where there are no additional planning controls, this document is intended as a good practice guide to owners. The aim is to preserve and enhance the character of Indexed buildings.

3 Policy Background

- 3.1 **Nationally**, the Government endorses the production of local indices in Planning Policy Guidance Note 15 “Planning and the Historic Environment” (PPG15), which says in paragraph 6.16

“Many buildings that are valued for their contribution to the local scene, or for local historical associations, will not merit [statutory] listing. Such buildings will often be protected by conservation area designation. It is also open to planning authorities to draw up lists of locally important buildings, and to formulate local plan policies for their protection, through normal development control procedures.”

- 3.2 **Locally**, the Cheltenham Borough Local Plan establishes a policy basis for preparing the Index and protecting the buildings on it in Policy BE30A, which states that

“The demolition of, or loss of features of special interest or character on, a building on the Index of Buildings of Local Importance will be resisted.”

- 3.3 With many of the Indexed buildings being in conservation areas, there are other policies of the Local Plan available to supplement this protection. Perhaps the most important is Policy BE13 which states that the demolition or substantial demolition of buildings or other significant structures in conservation areas will not be permitted, unless, inter alia, they make no positive contribution to the special character or appearance of the area. Any building on the *Index*, which is within a conservation area, will be seen as one which contributes positively to the conservation area.

- 3.4 A full list of directly relevant policies is at Appendix 1. They can be viewed in full at www.cheltenham.gov.uk. This list is unlikely to be exclusive, as there may be other policies affecting particular types of development; in this respect, the Plan needs to be read as a whole to gain a full understanding of the local policy environment.

4 Building Selection

- 4.1 The criteria for inclusion on the *Index* are based on the principles of selection used in assessing buildings for the Statutory List (PPG15 paragraph 6.10-6.12), the English Heritage checklist to assess the merits of unlisted buildings in conservation areas (*Conservation Area Appraisals*, English Heritage 1997) and the experience of other local authorities.
- 4.2 As with the Statutory List, the *Index* includes not only what we all recognise as buildings but also historic structures such as bridges, walls or railings; historic street furniture including post boxes, bollards, street lighting; and other features that contribute to local townscape or landscape. References to “building” below should be taken to include all indexed structures.
- 4.3 The focus of the *Index* is on local rather than national importance. Some selection of the better examples of these buildings or structures has been necessary and only those which survive in a clearly recognisable form, with their historic features and layouts still present, have been chosen.
- 4.4 The criteria for selection onto the Index includes architectural merit, historical interest and close historical association. The criteria in full are at Appendix 2.
- 4.5 The *Index* was prepared initially by The Conservation Studio (a private consultants), which was commissioned by the Council to undertake a full assessment of the buildings in the town based on the criteria. Buildings on the Index were subject to statutory consultation coincidentally with this SPD.
- 4.6 All future nominations for inclusions on the Local Index or requests for deletions from the Local Index which are submitted to the Local Planning Authority will be reviewed by a selected panel on an annual basis. The first review is scheduled for September 2008. The Index of Buildings of Local Interest review panel will consist of Conservation & Heritage Manager, Conservation & Heritage Assistant, Development Control Manager, Parks Development Manager, Cheltenham Civic Society representative, Cheltenham Art Gallery & Museum representative, Cabinet Member Environment and Chairman of Planning Committee.
- 4.7 Additions or deletions can be proposed by anyone and submissions should be made to the Council's Conservation Team with a clear statement of why the building should be considered, and should be accompanied with additional information such as photographs or historical information to support the statement. Additions to or deletions from the Index will be subject to a four week consultation process. This will include notification by letter to the owner or occupier of the nominated building, notifications by letter to relevant heritage groups (which may include English Heritage, Cheltenham Civic Society, local history societies etc), publication on the Council's website, notification via a notice in the Gloucestershire Echo and notification to all Borough Libraries and Resource Centres.

5 The Impact of the Index

- 5.1 As mentioned earlier, placing a building on the Index will not change any of the planning controls affecting its alteration or demolition. Many buildings have permitted development (PD) rights which allow some minor building operations. In some cases demolition can be carried out without recourse to planning or other permissions. However, the rules are complex and if there is any doubt, advice should be sought from the Council's planning staff. In conservation areas, the Government has removed many of these PD rights and more often some form of consent is required.
- 5.2 In brief, the controls are as follows:
- Inside a conservation area, Conservation Area Consent is required for the demolition of a building and certain alterations – including extensions and new building. In some conservation areas, there may be additional controls over the treatment of buildings – particularly where they front onto roads or public spaces.
 - Outside conservation areas there is control over many extensions and new building works. However the demolition of buildings requires no planning permission (although the Council must be given notice if a residential property is involved). Minor alterations to housing do not normally require any permission; however, stricter controls apply to buildings in other uses (including flats).
- 5.3 Where the Council does have control and determines planning applications for works to or affecting an Indexed building, it will take into account its special local architectural or historic interest.
- 5.4 Any proposals should respect the Indexed building's character or interest and should preserve or enhance it. This does not mean that it should be preserved exactly as it is – but that any alterations should be carried out in a sympathetic manner, using high quality design. Where there is control over demolition, it will normally be refused unless there is a strong justification.
- 5.5 It is hoped that the unique qualities of the building, recognised through its inclusion on the Index, will encourage owners to take pride in its care. This will be particularly important where the proposals are outside the control of the Council. In such cases it is intended that this document will act as a basis for good practice.
- 5.6 Where there is no control over development, the Council can often seek an Article 4 Direction under the Town and Country Planning (General Permitted Development) Order to remove PD rights – including in many cases the right to demolish – and a planning application will be required. Where the Council considers a building on the Index to be at risk of demolition or unacceptable alteration in circumstances where it has no planning control, it will consider using its Article 4 or spot listing powers to protect it – see section 7, below.

6 Assessment of Proposals

6.1 To summarise:

- Local Plan Policy BE30A seeks to prevent the loss of Indexed buildings to demolition and to protect those aspects of them which are considered to be special.
- There are no additional planning powers relating to Indexed buildings.
- However, where the Council has proposals to determine through the planning process it will seek take the special local interest into account in determining applications. In doing so it will address proposals in the manner set out below.
- Where the Council has no control over proposals, it is hoped that property owners will follow the same basic principles.

6.2 Issues for consideration in dealing with proposals for Indexed buildings:

- a. **Special features**, whether internal or external, should be conserved or restored. In this regard it is important that designers have a good understanding of what gives the building its special interest. Wherever possible, historic fabric should be retained or repaired to maintain authenticity. Repair of the fabric will normally use traditional materials and methods of working.
- b. **Extensions and new buildings** will preserve the scale, character and setting of the building. They will normally be subservient to the main building in height and massing. Extensions can achieve this either by adopting an historic or contemporary style.

If an historic approach is adopted – attention to historic detailing, materials and practice will be important.

If a contemporary style is adopted material quality, design detailing and contextual analysis will be important.

Reference should also be made to the Council's supplementary planning guidance on Residential Extensions and Alterations (www.cheltenham.gov.uk).

- c. The **setting** of an indexed building will normally be an important element in its character.

Proposals for alterations or for new buildings in grounds should give careful consideration to the quality and nature of the setting of buildings. In their positioning, layout and design, they should preserve the best settings and enhance those which are poor quality.

Likewise, the treatments of landscape, boundaries, surfacing etc. will also be important to the setting of the building. In a number of instances locally, the loss of trees and boundary enclosures has had an adverse impact on both the setting of historic buildings and the character of historic streets - it is important that proposals give them particular consideration.

Important elements in the setting of buildings are likely to be

- The arrangement of building elements to complement historic form and contemporary function;

- views into, from and through sites;
 - the traditional level of enclosure in the street;
 - the use of landscape features to frame, screen or enhance buildings;
 - the type and quality of surface cover treatments, their fitness for purpose and their ability to complement historic settings and buildings.
- d. **Demolition** of Indexed buildings will only exceptionally be permitted. Redevelopment proposals should use the principles of good architecture and urban design to retain and integrated Indexed buildings rather than demolish them. These principles are set out in the Local Plan (tables 4 and 5) and reproduced at Appendix 1.

Where the Council considers a redevelopment proposal to be important to the regeneration or good planning of an area and an Indexed building is demonstrated to compromise that proposal, demolition may exceptionally be permitted. In such circumstances, the applicant will be required to demonstrate through the scheme's Design and Access Statement what steps have been taken to attempt to protect the building and why they compromise the overall proposal. Applicants should refer to the Council's note on Design and Access Statements (www.cheltenham.gov.uk).

All proposals for demolition will be supported by a statement setting out an independent structural survey of the building; an analysis of the repair costs and market value of the building; and evidence that the building has been marketed at a realistic price which reflects the condition of the building. Where the Council accepts that retention of a building of local importance is not justified, it will require that provision is made by the developer to accurately record the building for archive purposes prior to demolition or alteration.

- e. In undertaking any work on Indexed buildings, owners should consider the implications for **sustainable building practices**. This could take a number of forms, including sustainable sourcing of materials and use of energy efficient designs. Additional information is available in the Council's supplementary planning guidance on Sustainable Buildings (www.cheltenham.gov.uk).
- f. Where proposals are likely to impact on items of **archaeological value** the Council will require an archaeological assessment of their impact. This should be accompanied by details of mitigation required to record those elements of the historic fabric which will be adversely affected.
- 6.3 In addition to these notes, PPG15 Annex C contains guidance notes of alterations to listed buildings. While the buildings on the Council's Index are not statutorily listed, the Annex does contain useful information on how to treat historic buildings of importance and maybe a useful reference for owner and designers.

7 Additional Powers

- 7.1 Although there are no additional planning powers associated with designation under the Index, the Council does have recourse to two areas of legislation which can bring buildings into the control of the planning regime.
- 7.2 **Article 4** of the Town and Country Planning (General Permitted Development) Order gives local authorities the power to remove PD rights, or to ask the Secretary of State to authorise their removal. This can include a range of PD rights from minor alterations to the demolition of some buildings. Whilst the normal process can take some time, there is a provision, in matters of urgency, which allows Councils to implement an Article 4 with immediate effect. This is subject to its review after a period of 6 months by the Secretary of State, in which time it is either confirmed or revoked. If the Council is concerned that there are PD proposals which would harm an Indexed building, it will consider using its powers under Article 4 to protect the building.
- 7.3 The Council will be liable for compensation payments to aggrieved applicants where the existence of an Article 4 leads to a refusal of planning permission for a proposal which might otherwise have been permitted development. If the case in point is, for example, permission to demolish a building and that demolition would give a cleared site which would otherwise have been a potential development site in policy terms, the compensation could be significant. It would be calculated as the difference between the value of the land with planning permission to demolish the building and the value of the land where that consent to demolish has been refused or subject to conditions other than those imposed by the planning regulations
- 7.4 The Council can also seek the **spot listing** of buildings if it considers them to be worthy of listing and under threat. Again this is a temporary measure which puts in place the same controls as would exist on a statutorily listed building for a 6 month period, during which time there will be a review of the circumstances prior to the listing being confirmed or otherwise. This is a procedure which is considered less useful in protecting Indexed buildings than Article 4 powers, because of the special qualities required for listing, but it is one which the Council will consider using when an Indexed building is threatened.

APPENDIX 1

Cheltenham Borough Local Plan Second Review 1991 – 2011 – Relevant Policies

POLICY CP 7 DESIGN

Development will only be permitted where it:

- (a) is of a high standard of architectural design; and**
- (b) adequately reflects principles of urban design; and**
- (c) complements and respects neighbouring development and the character of the locality and/or landscape (notes 2 and 3).**

Extension or alterations of existing buildings will be required to avoid:

- (d) causing harm to the architectural integrity of the building or group of buildings; and**
- (e) the unacceptable erosion of open space around the existing building.**

Note 1 Principles of urban design relevant to this policy are set out in table 4. Key design considerations for individual buildings are set out in table 5.

Note 2 Development should reflect the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Supplementary Planning Guidance on Conservation Areas.

Note 3 See also policies RT 83 (retail development in the Core Commercial Area) and HS 73 (C) (housing density).

Note 4 The fact that a particular form or location of development is the most cost effective option is not justification for an exception to policy CP 7.

TABLE 4 PRINCIPLES OF URBAN DESIGN

character

- create or reinforce a sense of place with its own distinctive identity
- reflect existing topography, landscape and ecology
- utilise a hierarchy of building form and design to reflect the use and importance of buildings
- create focal points and places
- create areas of hard and soft landscaping

continuity and enclosure

- use buildings and trees to define space
- distinguish clearly between public and private spaces, providing continuous building frontages between them where possible

quality of the public realm

- create attractive spaces which provide a variety of interest and experience
- produce comfortable local microclimates
- provide overlooking of streets and spaces, especially main elevations
- design lighting and landscaping to reduce opportunities for crime
- enrich space with well-designed details (e.g. paving, public art, lighting, signs, seats, railings, and other street furniture)
- avoid visual clutter and confusion, especially from signs and advertisements
- design areas for ease of maintenance, particularly in regard to litter collection, mechanical sweeping and the maintenance of planted areas

ease of movement

- promote accessibility to and within an area, particularly on foot, bicycle, and for people with limited mobility

increase permeability by avoiding culs-de-sac and connecting adjacent streets

legibility

- develop a clear, easily understood image of an area
- retain and create views of existing and new landmarks, skylines and other focal points
- provide recognisable and memorable features, especially at key locations

durability

- create spaces that can adapt easily to changes in need and use
- provide environments which are suitable for their use
- use quality materials

diversity

- where appropriate within buildings, street or areas, consider a mix of building forms, uses and tenures

TABLE 5 PRINCIPLES OF ARCHITECTURAL DESIGN

The architectural design of new buildings should demonstrate a creative response to a specific site and locality. Particular attention should be paid to:

function

- fitness for purpose

character

- historical context
- distinctive features of the locality (such as spatial quality, rhythms, density, scale, style and materials)

layout

- the urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area
- the efficient use of land

scale

- the size of the building, its elements and its details in relation to its surroundings and the human form
- massing (the arrangement, volume and shape of a building)
- height (its effect on shading, views, skylines and street proportion)

appearance

- materials (high quality and suited to their location and purpose)
- detailing

landscape

- the integration of buildings and landscape.

POLICY BE 13 DEMOLITION IN CONSERVATION AREAS

The demolition or substantial demolition of buildings or other significant structures in conservation areas will not be permitted, unless:

- (a) they make no positive contribution to the special character or appearance of the area; or**
- (b) the retention of the building is structurally and financially impracticable (taking into account all sources of finance, including associated development); or**
- (c) there is an essential need in the town for development which cannot be accommodated satisfactorily by a different form of development or in a different location; or**
- (d) the demolition serves to preserve or enhance the character or appearance of the conservation area, taking into account both the history and appearance of the building to be demolished and the contribution of any new buildings.**

Note 1 Anyone wishing to demolish a building or structure on the basis of the above exceptions will be required to provide convincing and fully documented evidence of the validity of the exception, including where appropriate, a full financial analysis demonstrating that the cost of necessary repairs and renovation, including reasonable expenses and profits, but excluding the purchase price, exceeds the value of the property on completion of the works.

Note 2 Significant structures include all permanent buildings or built structures, such as stables, outhouses or walls, and boundaries or enclosures constructed of a permanent material, such as brick, metal or stone, the removal of which would require Conservation Area Consent.

Note 3 Essential need refers to development that would produce substantial benefits for the community, such as a road or hospital extension for which there was no realistic alternative site, and which would decisively outweigh the loss resulting from demolition (see PPG15, paragraph 3.17).

Note 4 See also policies BE 25 (demolition of listed buildings) and CP 3 (sustainable environment)

POLICY BE 16 BOUNDARY ENCLOSURES IN CONSERVATION AREAS

In conservation areas:

- (a) boundary enclosures should be preserved in their original form; and**
- (b) new enclosures should be in a historically appropriate form.**

POLICY BE 30A BUILDINGS OF LOCAL IMPORTANCE

The demolition of, or harmful alteration of a building on the Index of Buildings of Local Importance will be resisted.

Note 1 The Borough Council will publish an Index of Buildings of Local Importance as supplementary planning guidance. Where appropriate powers available under Article 4(2) of the Town and Country Planning (General Permitted Development) Order 1995 will be used to protect buildings within designated conservation areas; elsewhere Article 4 Directions will be used.

Note 2 Planning permission is not required for the demolition of non-residential buildings outside conservation areas (see note 1).

Note 3 In cases where the demolition on the Index is sought, applications will be required to submit a robust statement in justification. This statement should include an independent structural survey of the building, an analysis of the repair costs and market value of the building, evidence that the building has been marketed at a realistic price which reflects the condition of the building. Where the retention of a building of local importance is not justified, and this has been accepted by the local planning authority, the Borough Council will require that provision is made by the developer to accurately record the building for archive purposes prior to demolition or alteration.

APPENDIX 2

CHELTENHAM LOCAL INDEX – REVISED CRITERIA:

Locally listed buildings or structures are those which make a special contribution to the history, appearance, character, and cultural value of Cheltenham. They include buildings which have qualities of age, style and detailing; historic structures such as walls or railings; historic street furniture including post boxes, bollards, street lighting; and other features which have historical or cultural significance, perhaps by association with a famous person or event. These should all survive in a clearly recognisable form, with their historic features and layouts still present. Some selection of the better examples of these buildings or structures will be necessary. It is likely that most of the entries will date from the mid-19th to the mid-20th century.

The Local Index for Cheltenham includes the following categories:

1. BUILDINGS.

These include:

- Buildings designed by a particular architect or designer of regional or local note
- Good examples of well designed domestic buildings which retain their original details and materials
- Good examples of educational, religious or community buildings which retain their original details and materials
- Landmark buildings or structures of notable design
- Buildings or structures of which contribute to our understanding of the development of the area

2 STRUCTURES.

These include:

- Notable walls or railings
- Street lighting
- Bollards
- Street surfaces
- Post boxes

3 HISTORIC ASSOCIATION.

These must be well documented and include:

- Any building or structure which has a close association with famous people or events
- Any building or structure which has a close association with an important local feature including statutorily protected sites or buildings

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- 2). Appendix A2 Stage A2 Schedule of baseline information
- 3). Appendix 3 SEA Framework indicators criteria and objectives
- 4). Appendix 4 Sustainability Appraisal Matrix – Local List SPD
- 5). Environmental Report
- 6). SEA Responses

ENVIRONMENTAL REPORT

Index of Buildings of Local Interest

1. Summary and outcomes

1.1 Non-technical summary

The purpose of the Sustainability Appraisal (SA) (which includes SEA requirements) is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of Supplementary Planning Documents (SPDs).

This SA analyses the Index of Buildings of Local Interest Supplementary Planning Document (SPD) against a series of sustainable objectives. It found that the implementation of Option 2 (which consisted of the preparation and adoption of the SPD) was the preferred option. The implementation of the preferred option would preserve and enhance buildings included on the Index of Buildings of Local Interest whilst contributing positively to a range of social, environmental and economic sustainability objectives.

1.2 Statement on the difference the process has made

The implementation of the SA has ensured that the guidance in the Index of Buildings of Local Interest SPD has been vigorously tested to demonstrate that it reflects sustainable development objectives, addressing social, environmental and economic effects of proposals at the outset of their preparation. The main negative effect identified by the process was lack of reference in the SPD to sustainable building practices and the sources of information. This was mitigated by the introduction of paragraph 6.2d. The Index of Buildings of Local Interest SPD is fully compatible with the Borough Council's Sustainability Criteria.

1.3 How to comment on the report

Index of Buildings of Local Interest SPD and an accompanying draft Sustainability Appraisal will be deposited for public consultation in October 2006, for a statutory period of six weeks. The documents will be available on the Council's website, local libraries and other deposit locations. Paper copies will be available on request.

2. Appraisal methodology

2.1 Approach adopted to the SA

The development of the SPD was carried out in conjunction with the SA scoping report (available in full at www.cheltenham.gov.uk). The SPD was considered against each criterion in the Measuring Tool (see Appendix 4) to assess their effects upon achieving the Council's sustainability objectives.

2.2. When the SA was carried out

The Sustainability Appraisal was carried out in conjunction with the drafting of the Index of Buildings of Local Interest SPD in August 2006.

2.3 Who carried out the SA

The Council's Urban Design Team undertook the SA.

2.4 Who was consulted, when and how

The Council's Strategic Land Use and Sustainability teams were consulted on the SA in September 2006. The four statutory Consultation Bodies (namely Countryside Agency, English Heritage, English Nature and Environment Agency) will be sent the draft SEA in September 2006, for a statutory period of 5 weeks. Following approval by Council's Cabinet, the Index of Buildings of Local Interest, its accompanying draft SPD and SEA will be available for public consultation for a period of 6 weeks.

3. Background

3.1 Purpose of the SA and the SA Report

The purpose of carrying out a sustainability appraisal on SPDs is to ensure that the Cheltenham Local Development Framework makes a positive contribution towards sustainable development and takes social, environmental and economic factors into consideration in developing policies and plans.

The purpose of the SA report is to determine whether the SPD will achieve the identified sustainable objectives in social, environmental and economic terms. Two options are tested against each other, with positive and negative impacts being identified. The process gives an opportunity to alter the emerging preferred option to either eradicate or mitigate negative impacts.

3.2 Plan objectives and outline of contents

The objective of the SEA Directive is to provide a high level of protection to the environment, with a view to promoting sustainable development.

The SEA is made up of the following stages -

Stage A1: Identifying other relevant policies, plans, programmes and sustainability objectives

Stage A2: Collecting baseline information;

Stage A3: Identifying sustainability issues and problems;

Stage A4: Developing the SA Framework

Stage A5: Consulting on the scope of the SA with the 4 statutory bodies

Stage B: Developing and refining options and assessing effects;

Stage C: Preparing the Sustainability Appraisal Report;

Stage D: Consulting on the draft SPD and Sustainability Report; and

Stage E: Monitoring the significant effects of implementing the SPD.

3.3 Compliance with the SEA Directive/Regulations

It is believed that the SA complies with the SEA Directive's objective of promoting sustainable development by critically examining how management proposals contribute to the promotion and provision of sustainable development. Where proposals may have a negative effect, mitigation measures are suggested to counterbalance this effect, therefore enabling the proposal to be sustainably viable.

4. Sustainability objectives, baseline and context

4.1 Links to other strategies, plans and programmes and sustainability objectives

The production of the SPD and SEA has involved the acknowledgement and incorporation of objectives of existing international, national and local plans, policies and programmes. A list of relevant plans, policies and programmes is at Appendix 1. This has ensured that the SPD incorporates specific requirements in order to meet their sustainability objectives. The SPD's most direct links are to:

- PPG15 (Planning and the Historic Environment) paragraph 6.16;
- A Strategy for the Historic Environment in the South West;
- Cheltenham's Community Plan – Priority -To protect and improve the environment of Cheltenham and make it a beautiful and sustainable town;
- Cheltenham Local Plan – Policy BE30A

- Gloucestershire County Structure Plan – Policy NHE6

The SPD with accompanying SA forms part of the Cheltenham Local Development Framework expanding on the policies of the Development Plan Documents (DPDs). There are a series of saved policies with the Cheltenham Borough Local Plan which relate to the preparation of an Index of Buildings of Local Interest and the protection of the buildings on it. These policies have been acknowledged in the production of the SPD and SA – most specifically, Policy BE30A Buildings of Local Importance.

4.2 Description of the social, environmental and economic baseline characteristics and the predicted future baseline

The baseline characterisation assessment gives a yardstick against which to measure the effects of the proposed policies and plans within the Local Development Framework (LDF) in terms of environment, economy and society.

The baseline information is made up of a variety of information and indicators taken from a range of sources, such as the Census, Gloucestershire Labour Market Information Unit (GLMIU), MAIDEN (a local information organisation) and best value performance indicators. It covers areas such as economy, social issues, inequalities, environmental issues and sustainability. Each characteristic has been broken down into a series of criteria covering areas such as biodiversity, flora and fauna, cultural heritage and landscape and population and human health. There is no baseline data directly relevant to the subject matter in this SPD. However, the information included under the 'Protecting and improving the quality of Cheltenham's built environment' Corporate Priority, demonstrates the heritage value of the town as a whole – with 7 conservation areas (including Central; Cheltenham CA – reputedly the largest in Europe) and over 2,500 listed buildings.

The matrix tests the options considered against a range of sustainability criteria. The adoption of the SPD will have a positive impact on achieving the environment Corporate Priority by protecting locally important heritage assets and promoting sustainable building and development

4.3 Difficulties in collecting data and limitations of data

The baseline data looks back several years, where available, to give an indication of trend. Some of the indicators have been modified since they were drawn up and this is noted in the schedule. It has not been possible to establish trends where the data is incomplete.

There has been some difficulty with obtaining some data sets and it is accepted that this information will need to be regularly updated and the most recent information available will be used for the purposes of the appraisal.

Much of the information collected at the A2 stage relates to new or fairly recent indicators and there is insufficient information to give reliable trends. Owing to this, only a small number of negative trends can be identified.

4.4 The SA framework, including objectives, targets and indicators

The SA framework details a series of social, environmental and economic sustainability objectives; a series of criteria to achieve these objectives; and indicators to measure their success.

The criteria are used in the Measuring Tool (Appendix 4) to assess the impact of the SPD against policy performance outcomes.

4.5 Main social, environmental and economic issues and problems identified

The SPD deals predominantly with environmental issues – particularly the protection of locally important heritage assets. The nature of the buildings which the SPD seeks

to protect (of local rather than national importance; not on the statutory list; both inside and outside conservation areas) suggests that there will be little in the baseline information to help develop the SPD. However, there is a consistently high percentage of brownfield land development in the Borough (see Scoping Report Appendix 2 Stage A2 item 3f) which indicates the pressure for redevelopment of previously developed sites. Anecdotally, those with larger gardens would be targets and these tend to be older buildings in large grounds, many of which are included on the Index.

5. Plan issues and options

5.1 Main strategic options considered and how they were identified

The two main options which came out of the SA process were –

Option 1 – Do nothing

Option 2 – Prepare and adopt the SPD

The effects of both options were considered, using the wide range of sustainability criteria set out in the matrix. It was necessary to test Option 1 in-order to assess the impact Option 2 would have on sustainability performance. The testing has helped to identify their significant sustainability outputs, indicating both the most sustainable option and areas where alterations were required to the SPD to improve performance.

The analysis of Option 2 through the matrix led to the addition of paragraph 6.2e to the SPD as a result of its failure on the following two matrix criteria:

- Promote more energy efficient design within development
- Promote renewable energy and reduce the demand for energy wherever possible

5.2 Comparison of the social, environmental and economic effects of the options

The SEA Framework in conjunction with the Measuring Tool provides the basis for predicting the effects of the alternatives in comparison with one another. It establishes if each effect is considered significant both by itself and in conjunction with other plans and programmes. Option 1 (do nothing) had a number of negative social, environmental and economic effects due primarily to lack of guidance or control over relevant issues. The positive effects of the preferred option (Option 2 – adoption of the SPD) include the following –

- To protect and enhance designated wildlife habitats and species
- To protect natural resources and reduce natural depletion
- Promote more energy efficient design within development
- Promote renewable energy and reduce the demand for energy wherever possible
- To safeguard and enhance the historic environment
- To promote education and access to the built environment and archaeology
- To protect and enhance landscape and townscape character
- To minimise adverse visual impact of development
- To encourage high quality design in new development to create local identity and encourage a sense of community pride.
- To create viable and attractive town centres that have vitality and a mix of uses

- To encourage more sustainable economic growth that operates within environmental limits
- Promote the restoration and remediation of previously developed land, contaminated land and derelict buildings
- To encourage the best use of materials and sustainable construction techniques, using local sources wherever possible

5.3 How social, environmental and economic issues were considered in choosing the preferred options

The sustainability criteria cover social, environmental and economic issues and through the Measuring Tool each criterion is assessed against five potential sustainability outputs – very negative, negative, negligible change, positive and very positive. Where appropriate supporting comments justify the level of effect chosen. The summary table in Appendix 4 gives an overall comparison of options. The option with the highest combined ‘positive’ and ‘very positive’ impacts was the preferred option, in terms of achieving sustainability objectives.

5.4 Other options considered, and why these were rejected

Option 1, namely ‘Do nothing’ was rejected due to its frequent negative and negligible effects upon the sustainability criteria.

5.5. Proposed mitigation measures

There are no residual negative effects within the preferred option.

6. Plan policies

6.1 Significant social, environmental and economic effects of the preferred option

The preferred option (prepare and adopt the SPD) has arisen through rigorous testing against a series of sustainability criteria, and against the rejected option. There are no negative impacts in this option. At the other end of the scale, there are a number of significant positive and very positive social, environmental and economic effects upon the Conservation Area. These effects are detailed within the comments box in the matrices and are set out below:

The SPD will protect some Indexed buildings from demolition, this may protect some habitats of protect species from destruction
The SPD encourages use of natural materials in repair and alteration. It also encourages retention of existing buildings. Advice on sourcing materials could be provided, but cannot be controlled through planning acts.
The SPD suggests use of sustainable construction methods
Implementation of SPD guidance would both safeguard and enhance heritage assets
The SPD encourages improved understanding of historic built environment
Implementation of SPD guidance would both protect and enhance landscape and townscape character
The SPD offers the potential for greater controls over visual impact of proposals and additionally offers advice to property owners where there is no planning control.
Implementation of the SPD may help develop understanding of the area and retain historic local identity.
Implementation of the SPD may contribute to the creation of a viable and attractive town centre that has vitality and a mix of uses

The SPD will encourage local economic growth through use of locally sourced sustainable materials
The SPD encourages reuse and improvement of existing buildings
The SPD will encourage local economic growth through use of locally sourced sustainable materials. Implementation of the SPD is likely to reduce demand for uPVC windows, which have high environmental impact in terms of both manufacture and disposal

6.2 How social, environmental and economic problems were considered in developing the policies

The SPD encourages the retention of locally important built assets and where alteration or repair is required, suggests the use of traditional materials as a first course of action. The essence of this approach is not only good planning and heritage practice, but has intrinsic benefits in terms of sustainability

- reuse of buildings;
- sustainable construction methods;
- use of traditional materials
 - likely to be locally sourced, thus supporting the local economy;
 - likely to be from renewable sources
 - unlikely to be use high energy production techniques.
- Encouraging understanding of the traditional local building techniques and skills, helping foster an understanding of the area and local identity.

The SPD was drafted to encourage this approach.

6.3 Proposed mitigation measures

There are no residual negative effects for the preferred option and no mitigation is required.

6.4 Uncertainties and risks

There are no areas of uncertainty.

7. Implementation

7.1 Links to other tiers of plans and programmes and the project level (environmental impact assessment, design guidance etc)

The SPD will, after public consultation, become adopted and used to expand policy and/or provide further detail to policies which have been saved. These will be reviewed/updated through the LDF process.

7.2 Proposals for monitoring

The SEA Regulations includes a requirement for the monitoring of “the significant environmental effects of the implementation of plans... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action” (Article 10.1).

Through the opportunity to review the Local Index itself (see SPD paragraph 4.6), there will be an regular partial review of the additional potential buildings. However, there are no specific indicators in the SEA framework capable of giving a pointer to the success or otherwise of the SPD, or the need for alteration. When the framework is next reviewed, it is suggested that two possible indicators are considered for inclusion:

- Number of structures on the Index of Local Buildings of Importance
- Number of structures on the Index of Local Buildings of Importance demolished in the past 12 months.

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INTERNATIONAL PLANS, POLICIES AND PROGRAMMES		
Other plan/programme	Objectives or requirements of the other plan or programme	How objectives and requirements might be taken on board
Johannesburg Declaration on Sustainable Development	The Johannesburg Declaration outlines the path taken to the WSSD, highlights present challenges, expresses a commitment to sustainable development, underscores the importance of multilateralism and emphasizes the need for implementation.	The LDF will need to be underpinned by the central concept of sustainable development. The SA will seek to incorporate some of the key issues addressed by the declaration.
Kyoto Agreement	The Kyoto protocol is an international agreement imposing limits on emissions of carbon dioxide and other gases scientists blame for rising world temperatures, melting glaciers and rising oceans. It was negotiated in the Japanese city of Kyoto in 1997 and ratified by 140 nations.	The LDF will need to incorporate within it, policies that will help reduce harmful emissions and adapt to climate change. The SA needs to incorporate objectives and targets relating to the need to stem climate change.
Strategic Environmental Assessment (SEA) Directive	European directive which requires an assessment to be made of the effect of certain plans and programmes on the environment. Key issues include biodiversity, health, soil, water, air quality, landscape, cultural heritage, climate, flora and fauna.	The SA will need to ensure that it incorporates the specific requirements of the directive.
NATIONAL PLANS, POLICIES AND PROGRAMMES		
Other plan/programme	Objectives or requirements of the other plan or programme	How objectives and requirements might be taken on board
PPG15: Planning and the historic environment	Sets out the Government's policies for the Historic Environment, Conservation Areas, and other areas of the Historic Environment. Policies should seek protection and enhancement of the historic environment whether it is listed buildings, conservation areas, or any other aspect of the historic environment.	Local authorities must monitor Conservation Areas, listed and non-listed buildings in order to ascertain if any further designations are required. LDF to address the preservation and

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		<p>enhancement of the historic environment.</p> <p>SA to incorporate objectives and criteria relating to the protection and preservation of the historic environment.</p>
PPS1: Delivering Sustainable Development	<p>Key objectives are to promote sustainable economic growth, regeneration to improve quality of life for local communities and social cohesion and inclusion.</p> <p>Also to bring forward land and resources sufficient for future needs, to improve access to facilities, to focus development which attracts large numbers of people in existing centres, promote more efficient use of land, protect and enhance the natural environment and address the issue of climate change.</p>	<p>The LDF will need to be based on the overarching principles of PPS1.</p> <p>The SA will need to ensure that the SA Framework will assess each potential policy/proposal having regard to the key priorities of PPS1 including social cohesion, quality of life etc.</p>
PPS12: Local Development Frameworks	<p>Sets out the Government's policy for the preparation of Local Development Frameworks. Strong emphasis on community consultation and frontloading. Requires LDFs to be prepared with a view to contributing towards sustainable development. SA to be integrated into the plan preparation process.</p>	<p>The LDF must be prepared in accordance with the guidance set out in PPS12 and must be underpinned by the central concept of sustainable development.</p> <p>Ensure compliance with SEA directive.</p>
PPG16: Archaeology and planning	<p>Sets out Government policies with regard to archaeological remains and also how they should be recorded and preserved.</p> <p>Policies should be included in the LDF aimed at the protection, enhancement, and preservation of sites of archaeological interest and also their settings.</p> <p>An archaeological investigation of areas within a proposals map may be required to ascertain if any archaeological remains exist, and the importance that should be attached to their preservation and/or further assessment.</p>	<p>The LDF will need to include policies relating to sites of archaeological importance.</p> <p>SA to incorporate objectives and criteria relating to the protection and preservation of the historic environment.</p>

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REGIONAL PLANS, POLICIES AND PROGRAMMES		
Other plan/programme	Objectives or requirements of the other plan or programme	How objectives and requirements might be taken on board
'Our Environment Our Future' Regional Strategy for the South West Environment 2004-2014	<p>This document provides a vision and aims for the environment of the south west in the future. It identifies pressures threatening the environment and key issues to be tackled. The purpose of the strategy is to:</p> <ul style="list-style-type: none"> ▪ Generate awareness of the importance of the south west environment to people living in, working in and visiting the south west ▪ Identify priorities for protecting and enhancing the environment for the benefit of current and future generations ▪ Ensure decisions are based on an understanding that social and economic activity must be undertaken within the carrying capacity of the region ▪ Provide a framework for action 	<p>The LDF will have regard to the key issues of climate change; wiser use of natural resources; food, farming and forestry; tourism and leisure; spatial planning and transport.</p> <p>Recognition of a broad range of environmental issues within the SA.</p>
Strategy for the Historic Environment in the South West 2004	<p>The Strategy aims to change the way the historic environment is perceived and valued in the region. It recognises that the entire environment is historic - with human activity having created land use and settlement patterns that closely reflect the physical environment, particularly geology and topography, climate and the region's peninsula landform.</p> <p>Priorities are to:</p> <ul style="list-style-type: none"> ▪ Ensure the Historic Environment is integrated into the Region's Policy Framework ▪ Develop positive and creative partnerships that reflect the many linkages and opportunities in the South West ▪ Ensure the Historic Environment is accessible and relevant to people in their everyday lives 	<p>The LDF will need to have regard to the protection of the historic built environment in its broadest sense and to ensure that the historic environment is accessible to all.</p> <p>SA to recognise the importance of the historic environment, not just protecting it but also improving access to it.</p>

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	<ul style="list-style-type: none"> ▪ Raise awareness of the historic dimension of the wider environment and its contribution to quality of life ▪ Share knowledge and build a better understanding of the role and potential of the Historic Environment 	
SW Integrated Regional Strategy (IRS) (Nov '04) 'Now Connecting' (2005) –the Delivery Plan	<p>The Integrated Regional Strategy is an important mechanism for more integrated regional working providing a set of broad objectives and priorities relevant across sectors.</p> <p>Headline aims include:</p> <ul style="list-style-type: none"> ▪ To harness the benefits of population growth and manage the implications of population change ▪ To enhance our distinctive environments and the quality and diversity of our cultural life ▪ To enhance our economic prosperity and quality of employment opportunity ▪ To address deprivation and disadvantage to reduce significant intra-regional inequalities 	<p>Cheltenham lies within the northern sub region of the South West region. The IRS will inform a number of different aspects of the LDF.</p> <p>SA to incorporate objectives relating to culture, economy, deprivation and inequality.</p>
COUNTY LEVEL PLANS, POLICIES AND PROGRAMMES		
Other plan/programme	Objectives or requirements of the other plan or programme	How objectives and requirements might be taken on board
Gloucestershire Structure Plan Second Review (1999)	<p>Existing adopted County Structure Plan providing strategic planning guidance for the County focusing new development in the Principal Urban Areas. Covers the period 1991 to 2011. The strategy is based on:</p> <ul style="list-style-type: none"> ▪ Maximising the use of brownfield sites ▪ Utilising the capacity identified by the joint working process on Greenfield sites well related to existing urban areas 	<p>Remains the adopted Local Plan and will therefore need to be reflected in the LDF until replaced.</p> <p>SA to incorporate some of the main strategic objectives of the plan including the reuse of brownfield land.</p>

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	Elsewhere in the County, to utilise the capacity identified by the joint working process on sites within or adjacent to towns and villages	
CHELTENHAM PLANS, POLICIES AND PROGRAMMES		
Other plan/programme	Objectives or requirements of the other plan or programme	How objectives and requirements might be taken on board
Cheltenham's Community Plan – Our Future, Our Choice (October 2003 – March 2007)	<p>The plan has been prepared by the Cheltenham Strategic Partnership, which brings together the key organisations and partnerships in the borough.</p> <ul style="list-style-type: none"> ▪ The community plan identifies five main priorities: ▪ To reduce crime and disorder, and the fear of crime, in our communities ▪ To improve the supply and standard of affordable housing ▪ To reduce inequalities in our communities and develop a sense of community. ▪ To protect and improve the environment of Cheltenham and make it a beautiful and sustainable town (that is, a town that can grow and develop to improve quality of life for all, now and in the future). ▪ To improve sustainable transport options (that is, transport that allows the whole community to travel safely and easily in an environmentally-friendly way). 	The Community Plan is currently being reviewed. A timetable has been prepared that allows this review to be undertaken alongside preparation of the Core Strategy of Cheltenham's LDF. This will ensure Cheltenham's emerging LDF will fully reflect the vision and objectives drawn up by the community it serves.
Cheltenham Local Plan Second Review 1991 – 2011	<p>This Plan has been prepared within the context of the Gloucestershire Structure Plan Second Review and covers the period to 2011. The Plan is intended to perform 4 functions:</p> <ul style="list-style-type: none"> ▪ To Develop the policies and proposals of the Structure Plan ▪ To develop a detailed basis for development control ▪ To provide a basis for co-ordinating development and other use of land 	Cheltenham Local Plan has undergone a sustainability appraisal. This can inform the SEA process.

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	<ul style="list-style-type: none"> ▪ To bring local and detailed planning issues before the public 	
Corporate Business Plan: 2004 – 2007	<p>This sets out Cheltenham Borough Council's vision, purpose, values, core aims and priorities.</p> <p>The corporate priorities are:</p> <ul style="list-style-type: none"> ▪ increase the provision of affordable housing, particularly in the social rented sector, and work towards a balanced housing market; ▪ reduce crime and disorder and the fear of crime in our communities; ▪ protect and improve the environment of Cheltenham and ensure the organisation becomes more sustainable; ▪ reduce reliance on the private car and increase the proportion of trips made by public transport, cycling and walking; ▪ re-dress the imbalances in our communities and build strong healthy geographical communities and communities of interest; and ▪ enhance the town's reputation as a national and international cultural centre, promote a healthy and sustainable economy and provide opportunities to broaden and enrich sport, play and cultural experiences. <p>The organisational priority is:</p> <ul style="list-style-type: none"> ▪ be an excellent authority delivering high standards of service. 	<p>The LDF will provide a mechanism for working towards a number of the Council's objectives.</p> <p>SA to address and incorporate the strategy's main priorities and aims.</p>
Supplementary Planning Guidance : Sustainable Buildings	<p>This supplementary planning guidance is intended to ensure that healthy and highly efficient buildings are created, using materials and methods, which have a reduced impact on the environment. This means considering environmental impacts during the whole lifecycle of a building, from site identification through the</p>	<p>SA to ensure that buildings are developed using materials and methods that have a reduced impact on the environment.</p>

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	construction process, to the building's normal operating conditions, and then to the end of its proposed lifespan. All developments should encourage long periods of use.	
Supplementary Planning Guidance: Sustainable Developments	This supplementary planning guidance is designed to encourage more sustainable developments in Cheltenham, by providing advice on healthy and highly efficient buildings, the use of appropriate materials and methods, which have a reduced impact on the environment.	Developments should consider environmental impacts during the whole lifecycle of a building, from site identification through the construction process, to the building's normal operating conditions, and then to the end of its proposed lifespan.

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Stage 2 - Baseline Information July 2006

The information collected in this table will be updated annually, and also reviewed to incorporate new indicator as appropriate.

3. Protecting and improving the environment												
3a	Protecting and improving the quality of Cheltenham's built environment	% of land designated as conservation area	CP – CBC LPI	12.9%	12.9%	12.9%	14.77 %	14.77 %	14.77 %	14.77 %		This figure rose in the period 01/02 reflecting the designation of an additional conservation area.
		No. of conservation areas	New BVPI 219a	6	6	6	7	7	7	7	7	See above.
		Percentage of conservation areas with up-to-date: • Character appraisal • Management proposals									71% 0%	Too little information to give an accurate picture
		No. of buildings at risk	CBC								1	Too little information to give an accurate picture
		Scheduled monuments									6	Too little information to give an accurate picture
		No. of listed buildings	CP – CBC LPI	2,700	2,700	2,540	2,540	2,540	2,540	2,540		The number of listed buildings fell from 2,700 to 2,540 in 2000. This was largely due to a re-list commissioned in this year by the Department of Culture, Media and Sport.
3f (part)	Reducing environmental pollution (air, water and noise pollution and contaminated land)	% new homes built on previously developed land	CP – old QoL 33b, BVPI 106, CBC	91%	96%	87%	100%	100%	91%	81%	85.2%	After reaching its peak in the period 2001-03, it is with some inevitability that the use of previously developed land has dropped off.

Key to acronyms used within the table

CP- Community Plan Indicator

BVPI – Office for the Deputy Prime Minister (ODPM) Best Value Performance Indicator – updated to 2006

ACPI – Audit Commission Performance Indicator (pre 2001)

Old QoL – UK Government Quality of Life set

New QoL – UK Government new set of Quality of Life Indicators 2005

LPI – Local Performance Indicator

TEN – Included in TEN as LPIs

BVPP- Annual Best Value Performance Plan available on Cheltenham Borough Council website.

ACDP – Audit Commission data profile

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Stage 3 - SEA Framework

The SEA framework assessment will not have all the columns listed below. It will have a column to enable those undertaking the SA work to record comments.

Objective	Criteria	Indicator
Biodiversity		
1. To protect and enhance biodiversity and geodiversity.	To protect and enhance designated wildlife habitats and species	Area of local nature reserves/ per 1000 population
	To support agricultural practices which protect and enhance designated habitats and species	Number of key wildlife sites
	To achieve BAP targets	Area of Local Nature reserves Number of protected species
Water		
2. To maintain and enhance water resources and quality.	To protect natural resources and reduce natural depletion	EA Biological and chemical river quality (% of km of river achieving cat A % of km of river achieving cat B
	To encourage higher water efficiency	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood risk grounds or water quality
3. To reduce flood risk	Avoid developments being at risk from flooding	Flood risk maps
	Ensure developments which are at flood risk are adequately protected	Average household water consumption per capita Proportion of new developments with SUDS Commercial water consumption
4. Encourage water efficiency and conservation	To improve flow of rivers	Area liable to flood
	Promote Sustainable Urban Drainage Systems in developments	No. of sites of potential concern with respect to contamination Total area of contaminated/derelict land/ proportion derelict
Soil		

5. Safeguard high quality agricultural land from development	To safeguard the higher quality agricultural land from development (Grades 1, 2 & 3)	Amount of high quality land lost due to development Area of contaminated land brought back into use Area of greenfield land lost
6. Minimise soil loss	To limit soil loss in association with new developments	% of development taking place on brownfield land No. of sites of potential concern with respect to contamination Total area of contaminated/derelict land/ proportion derelict
Climatic factors		
7.Minimise the impacts of climate change and reduce carbon dioxide levels	Improved coping mechanisms for weather extremes integrated within development	CO ₂ emissions from LA buildings Estimated CO ₂ emissions for industrial and commercial sector
	To encourage more sustainable economic growth that operates within environmental limits (also under Economic factors)	Estimated CO ₂ emissions for road transport Total estimated CO ₂ emissions per capita
	Promote more energy efficient design within development	Estimated domestic carbon dioxide emissions Estimate domestic carbon dioxide emissions per capita
	Reduce the need to travel	Use of renewable electricity in CBC buildings
	Promote renewable energy and reduce the demand for energy wherever possible	Average annual domestic sales of gas per consumer (kWh)

		<p>Average annual domestic consumption of electricity per consumer (kWh)</p> <p>% viewpoint members switching to renewable energy</p>
Air		
8. To protect and improve air quality	Reduce the need to travel, in particular reducing the reliance on cars through well planned development which promotes access to employment and facilities by alternative means	<p>No. of days p. a. when ozone levels are mod. or higher</p> <p>Total CO2 emissions for Cheltenham</p> <p>Total CO2 emissions for Cheltenham per capita</p> <p>Air quality data</p> <p>No. of days when air pollution is moderate or higher for PM10</p>
	To improve existing air quality problems	
	Ensure development does not exacerbate air quality problems	
Cultural Heritage		
9. To safeguard and enhance the historic environment	To safeguard and enhance the historic environment	<p>% of land designated as conservation area</p> <p>Number of conservation areas</p> <p>Percentage of conservation areas with up-to-date:</p> <ul style="list-style-type: none"> • Character appraisal
	To promote education and access to cultural and community facilities	
	To promote education and access to the built environment and archaeology	

		<ul style="list-style-type: none"> • Management proposals Number of buildings at risk Number of Scheduled monuments Number of listed buildings Number of visits (in person) to museums per 1000 population
Landscape		
10. To protect and enhance the landscape	To protect and enhance landscape and townscape character	Light pollution Area of designated landscape lost or affected by new development
	To avoid light pollution whilst striking a balance with safety	
	To minimise adverse visual impact of development	
Population and human health		
11. Improve the quality and quantity of accessible open space and recreation	To protect and enhance open spaces for the benefit of wildlife and people	Number of council leisure (sports and swimming) facility users during the year No of sports pitches available to the public No of council play areas per 1,000 children under 12 % of population within 20 mins travel time of different types of sports facility No. of parks with Green Flag
	To provide suitable amenity and recreation space in association with development	
	To reduce health inequalities	
	To encourage high quality design in development to create local identity and encourage a sense of community pride	

		<p>Area of land designated as SSSI or LNR</p> <p>Area of SSSI land designated in favourable condition</p> <p>Area of local nature reserves/ per 1000 population</p> <p>No. allotment plots</p> <p>% tenanted allotments</p> <p>Number of pregnancies in girls under 18 - for every 1,000 girls aged between 15 and 17</p> <p>Death rate by cause for every 100,000 people in the population:</p> <p>Assessment of people's health</p>
12. To include measures which improve access to high quality health, jobs education, recreation and community facilities for all	To reduce the need to travel through the integration of housing, employment and facilities	<p>Average daily traffic flow on principal roads:</p> <ul style="list-style-type: none"> • Tewkesbury Road • Evesham Road • London Road • Shurdington Road (1999) <p>Gloucester Road</p> <p>Average traffic flow each year for every 1,000 km of main road.</p> <p>Travel to work data:</p> <ul style="list-style-type: none"> • % cycling • % walking <p>% using public transport</p> <p>Estimate traffic flows for all vehicle types (million vehicle km)</p>
	To provide a well integrated, safe system of public transport	

Social factors		
13. Reducing crime and disorder	To reduce all levels of crime	Number of ASBOs Number of reported crimes per 1000 households: <ul style="list-style-type: none"> domestic burglaries violent offences (changed criteria – from 2006 number of robberies per 1000 pop) vehicle crime (1,000 pop.) Number of reported racist crimes and incidents per 100,000 Number of reported homophobic crimes and incidents
	To design development with well used areas to help reduce crime and the fear of crime.	
14. To improve the provision and condition of affordable housing	To provide quality affordable housing	Number of affordable housing and social rented properties – CBC. Number of affordable homes enabled within borough boundary Average house price to average income ratio ACDP – some discrepancies with data Total number of new housing completions and % affordable LA homes not decent at the start of the year % of unfit, privately owned homes brought back into use. Now deleted as a national performance indicator Number of vacant dwellings returned to occupation or demolished Number of dwellings that have been empty over 6 months

15. To provide a balanced and sustainable housing market	Promote a flexible range of housing types and tenures	Average house price to average income ratio ACDP – some discrepancies with data Total number of new housing completions and % affordable Average house prices in Cheltenham
16. Promote equality and address social exclusion	To encourage people to access the learning and skills they need for high quality of life	Number of visits to museums The percentage of young people in full time education
	To ensure that facilities and services are accessible to all sectors of the community.	Number of child care places per 1,000 population The percentage of 15 year olds getting five or more GCSEs at grades A-C
	To promote equality of opportunity for all	Percentage of working age population with NVQ2 or equivalent and NVQ4 or equivalent Percentage of those with serious mental illness getting access to physical health checks The proportion of children under 16 living in low-income households/ % of children and people over 60 living in income deprived households % of population that live in Super Output Areas that are ranked in most deprived 25% (ACDP - % living in most deprived SOA) Total number of housing benefit claimants Number of housing benefit claimants per 1000 population % of working age claiming key benefits The percentage of council buildings with facilities for disabled people The percentage of unemployed people as at 31 March each year. The percentage of working age people (18 to 65) who are in work. % of unemployed people claiming benefits who have been out of work for more than a year.

17. Enhance community identity and participation	To recognise the value of the diversity within the community.	% of residents surveyed who: <ul style="list-style-type: none">Are satisfied with their local area as a place to livefeel that the area is getting worse % of people surveyed who participate in local community activity: other The percentage of 18 year olds voting in local elections % of electoral voting at last election % of people surveyed who feel that they can influence decisions affecting their local area
	To encourage high quality design in new development to create local identity and encourage a sense of community pride.	
Economic factors		
18. To provide a sustainable economy	To create viable and attractive town centres that have vitality and a mix of uses	The percentage of unemployed people as at 31 March each year.
	To promote the role of local and neighbourhood centres for providing services and facilities	The percentage of working age people (18 to 65) who are in work.
	To encourage more sustainable economic growth that operates within environmental limits	% of unemployed people claiming benefits who have been out of work for more than a year. % change in number of local jobs No. new business starts supported by Econ Devt No. of VAT registered businesses and % change over last year
Material Assets		
19. Making the most efficient use of land	Concentrate new developments on previously developed land, subject to historic or biodiversity constraints	% new homes built on previously developed land No. of sites of potential concern with respect to contamination Total area of contaminated/derelict land/ proportion derelict
	Promote the restoration and remediation of previously developed land, contaminated land and derelict buildings	No. of buildings at risk

20. To make the best use of natural resources	Promote renewable energy and reduce the demand for energy wherever possible (also under climatic factors)	Weight of municipal waste arising p.a. <ul style="list-style-type: none"> • % land filled • % recycled • % composted
	To increase recycling and composting	Kg of waste collected per head p.a.
	To encourage the best use of materials and sustainable construction techniques, using local sources wherever possible	% pop served by kerbside recycling collection (or within 1 Km of recycling centre – before 2001) Daily domestic water use (per capita consumption) Use of renewable electricity in CBC buildings Average annual domestic sales of gas per consumer (kWh) Average annual domestic consumption of electricity per consumer (kWh)

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Stage 4 - Measuring tool

Central Government guidance indicates that it is open to planning authorities to prepare lists of locally important buildings and structures, and to formulate policies for their protection, whilst making it clear that they do not enjoy the full protection of statutory listing. In recent years a number of Cheltenham's locally valued buildings have been demolished so that their sites can be more intensively developed. Others have had important features lost or removed through ill-considered alterations. By compiling the *Index*, the Council aims to protect buildings of local importance from insensitive alteration and demolition through the use of powers available under the Planning Acts. Where there are no additional planning controls, the *Index* is intended as a good practice guide to owners. The aim is to preserve and enhance the character of Indexed buildings.

The Council considered two options following the preparation of the Index of Buildings of Local Interest

Option 1 – Do not prepare an SPD to support the Index

Option 2 – Prepare and adopt the SPD

Summary	Very negative	Negative	Negligible	Positive	Very Positive
Option 1	1	4	39	0	0
Option 2	0	0	31	8	5

Policy/Plan/Programme measuring tool. How will the implementation of the policy/plan/programme effect.....	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
Criteria						
To protect and enhance designated wildlife habitats and species						
Option 1			O			
Option 2				O		The SPD will protect some Indexed buildings from demolition, this may protect some habitats of protect species from destruction
To support agricultural practices which protect and enhance designated habitats and species						
Option 1			O			
Option 2			O			

Policy/Plan/Programme measuring tool.	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
How will the implementation of the policy/plan/programme effect.....						
To achieve BAP targets						
Option 1			O			
Option 2			O			
To protect natural resources and reduce natural depletion						
Option 1			O			
Option 2				O		The SPD encourages use of natural materials in repair and alteration. It also encourages retention of existing buildings. Advice on sourcing materials could be provided, but cannot be controlled through planning acts.
To encourage higher water efficiency						
Option 1			O			
Option 2			O			
Avoid developments being at risk from flooding						
Option 1			O			
Option 2			O			
Ensure developments which are at flood risk are adequately protected						
Option 1			O			
Option 2			O			
To improve flow of rivers						
Option 1			O			
Option 2			O			
Promote Sustainable Urban Drainage Systems in developments						
Option 1			O			
Option 2			O			
To safeguard the higher quality agricultural land from development (Grades 1, 2 & 3)						
Option 1			O			
Option 2			O			
To limit the loss of soil loss in association with new developments						

Policy/Plan/Programme measuring tool. How will the implementation of the policy/plan/programme effect.....	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
Option 1			O			
Option 2			O			
Improved coping mechanisms for weather extremes integrated within development						
Option 1			O			
Option 2			O			
Promote more energy efficient design within development						
Option 1			O			
Option 2				O		The SPD suggests use of sustainable construction methods
Promote renewable energy and reduce the demand for energy wherever possible						
Option 1			O			
Option 2				O		The SPD suggests use of sustainable construction methods
Reduce the need to travel, in particular reducing the reliance on cars through well planned development which promotes access to employment and facilities by alternative means						
Option 1			O			
Option 2			O			
To improve existing air quality problems						
Option 1			O			
Option 2			O			
Ensure development does not exacerbate air quality problems						
Option 1			O			
Option 2			O			
To safeguard and enhance the historic environment						
Option 1		O				Lack of an SPD will fail to protect locally important heritage assets
Option 2					O	Implementation of SPD guidance would both safeguard and enhance heritage

Policy/Plan/Programme measuring tool. How will the implementation of the policy/plan/programme effect.....	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
						assets
To promote education and access to cultural and community facilities						
Option 1			O			
Option 2			O			
To promote education and access to the built environment and archaeology						
Option 1			O			
Option 2				O		The SPD encourages improved understanding of historic built environment
To protect and enhance landscape and townscape character						
Option 1		O				Lack of an SPD will fail to protect landscape and townscape character
Option 2					O	Implementation of SPD guidance would both protect and enhance landscape and townscape character
To avoid light pollution whilst striking a balance with safety						
Option 1			O			
Option 2			O			
To minimise adverse visual impact of development						
Option 1		O				Lack of SPD gives less control to protect against adverse visual impact and fails to give advice to property owners
Option 2					O	The SPD offers the potential for greater controls over visual impact of proposals and additionally offers advice to property owners where there is no planning control.
To protect and enhance open spaces for the benefit of wildlife and people						
Option 1			O			
Option 2			O			
To provide suitable amenity and recreation in association with						

Policy/Plan/Programme measuring tool. How will the implementation of the policy/plan/programme effect.....	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
development						
Option 1			O			
Option 2			O			
To reduce the need to travel through the integration of housing, employment and facilities						
Option 1			O			
Option 2			O			
To provide a well integrated, safe system of public transport						
Option 1			O			
Option 2			O			
To reduce all levels of crime						
Option 1			O			
Option 2			O			
To design development with well used areas to help reduce crime and the fear of crime.						
Option 1			O			
Option 2			O			
To provide quality affordable housing						
Option 1			O			
Option 2			O			
Promote a flexible range of housing types and tenures						
Option 1			O			
Option 2			O			
To encourage people to access the learning and skills they need for high quality of life						
Option 1			O			
Option 2			O			
To ensure that facilities and services are accessible to all sectors of the community.						
Option 1			O			
Option 2			O			

Policy/Plan/Programme measuring tool.	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
How will the implementation of the policy/plan/programme effect.....						
To reduce health inequalities						
Option 1			O			
Option 2			O			
To recognise the value of the diversity within the community.						
Option 1			O			
Option 2			O			
Promoting equality of opportunity for all						
Option 1			O			
Option 2			O			
To encourage high quality design in new development to create local identity and encourage a sense of community pride.						
Option 1	O					No guidance provided
Option 2					O	Implementation of the SPD may help develop understanding of the area and retain historic local identity.
To create viable and attractive town centres that have vitality and a mix of uses						
Option 1			O			
Option 2				O		Implementation of the SPD may contribute to the creation of viable and attractive town centres that have vitality and a mix of uses
To promote the role of local and neighbourhood centres for providing services and facilities						
Option 1			O			
Option 2			O			
To encourage more sustainable economic growth that operates within environmental limits						
Option 1			O			
Option 2				O		The SPD will encourage local economic growth through use of locally sourced sustainable materials

Policy/Plan/Programme measuring tool.	Policy performance outcome					Comments, e.g. Can this be mitigated? Will the effect be permanent?
	Very negative	Negative	Negligible change	Positive	Very positive	
How will the implementation of the policy/plan/programme effect.....						
Concentrate new developments on previously developed land, subject to historic or biodiversity constraints						
Option 1		O				Option 1 may enable increased concentration of development on brownfield land, but this would be due to an inability to protect local heritage interests.
Option 2			O			Development of previously developed land on sites affected by the SPD can be undertaken, with due regard to heritage and biodiversity constraints
Promote the restoration and remediation of previously developed land, contaminated land and derelict buildings						
Option 1			O			
Option 2				O		The SPD encourages reuse and improvement of existing buildings
To increase recycling and composting						
Option 1			O			
Option 2			O			
To encourage the best use of materials and sustainable construction techniques, using local sources wherever possible						
Option 1			O			
Option 2					O	The SPD will encourage local economic growth through use of locally sourced sustainable materials. Implementation of the SPD is likely to reduce demand for uPVC windows, which have high environmental impact in terms of both manufacture and disposal

Index of Buildings of Local Interest – responses to SEA

Item	Respondent	Response	Action Needed	Action Taken
1	Glos County Council	<p>a) Various comments on SA report and Appendix 1</p> <p>b) Selection criteria for the Index should include archaeological criteria.</p> <p>c) Introduce references to archaeological assessment into Section 6.2</p>	<p>a) Amend Appendices as appropriate</p> <p>b) No action. The criteria do not form part of the SPD, but are appended for information explaining how structures on the Index were selected. Agree revisions need to be made as suggested, but this would need to be part of a resurvey in future years.</p> <p>c) Reword/revise as appropriate</p>	<p>a) Amended Appendices as appropriate</p> <p>b) None required</p> <p>c) Reword/revise</p>
2	Environment Agency	<p>a) Various comments on Appendices 1-3 of initial scoping report</p> <p>b) Introduce mention of flood risk</p>	<p>a) Amend Appendices as appropriate</p> <p>b) No action. Flood risk is one of a number of important issues in considering planning applications. However, the Government has advised that planning documents need to be concise and read in the round. There are policies on flood risk in the Local Plan and comment in this SPD would not add to its value and may make it more difficult to understand.</p>	<p>a) Amended Appendices as appropriate</p> <p>b) None</p>
3	Natural England	No comment to make	None	None

Index of Buildings of Local Interest Supplementary Planning Document

Summary of main Issues and how Cheltenham Borough Council has responded to them

Main issues raised and the Council's response to them

Representations on the Index of Buildings of Local Interest Supplementary Planning Documents are attached.

The Index of Buildings of Local Interest Supplementary Planning Document has generally been welcomed by those making representations on it. However, there has been much interest in how the planning rights of an indexed building will be affected. This is explained in the SPD.

Index of Buildings of Local Interest SPD

Many of the representations relate to factual inaccuracies of descriptions of buildings included on the Index. These factual inaccuracies have been checked and amended where appropriate. Representations to add a building to the Index or remove a building from the Index have been carefully considered, and the decisions are all recorded in the Council's response to the representations received.

Within the SPD the wording of section 4.6 has been amended following the consultation period. This has been done as it is important that the Index is kept up to date and that a transparent process is put in place to review future nominations and requests for deletions. Section 4.6 clarifies the review procedure for future nominations for inclusion on the Local Index or requests for deletions from the Local Index. A selected panel will review these requests on an annual basis.

The specific wording of section 3.3 of the SPD has also been amended following representations to clarify that where a locally indexed building is within a conservation area, it shall be seen as one which contributes positively to that conservation area.

A breakdown of the comments received is set out below.

	No. of Respondents	No. of Comments Received	No. of Supporting Comments	No. of Objections
Index of Buildings of Local Interest SPD	6	12	9	3

Representations for Index of Buildings of Local Interest - SPD

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	1367 - 2	Cheltenham Borough Council	SPD Amendment of paragraphs 4.6 and 4.7 of the SPD to improve clarity	Clarify the future procedure for reviewing nominations for inclusion of further buildings on the Index, and for requests to delete buildings from the Index.		<p>Paragraph 4.6 shall read: 'All future nominations for inclusions on the Local Index or requests for deletions from the Local Index which are submitted to the Local Planning Authority will be reviewed by a selected panel on an annual basis. The first review is scheduled for September 2008. The Index of Buildings of Local Interest review panel will consist of Conservation & Heritage Manager, Conservation & Heritage Assistant, Development Control Manager, Parks Development Manager, Cheltenham Civic Society representative, Cheltenham Art Gallery & Museum representative, Cabinet Member Environment and Chairman of Planning Committee.'</p> <p>Paragraph 4.7 shall read: 'Additions or deletions can be proposed by anyone</p>

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
						<p>and submissions should be made to the Council's Conservation Team with a clear statement of why the building should be considered, and should be accompanied with additional information such as photographs or historical information to support the statement. Additions to or deletions from the Index will be subject to a four week consultation process. This will include notification by letter to the owner of the nominated building, notifications by letter to relevant heritage groups (which may include English Heritage, Cheltenham Civic Society, local history societies etc), publication on the Council's website, notification via a notice in the Gloucestershire Echo and notification to all Borough Libraries and Resource Centres.'</p>
	1367 - 1	Cheltenham Borough Council	SPD Amendment to improve clarity	Remove the word 'ideally' from paragraph 4.7 of the SPD.		Amend wording of paragraph 4.7 of SPD - change from 'Additions can be proposed by anyone and submissions should

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
						<p>ideally be accompanied with additional information such as photographs or historical information to support the statement.'</p> <p>to</p> <p>'Additions can be proposed by anyone and submissions should be made to the Council's Conservation Team with a clear statement of why the building should be considered, and should be accompanied with additional information to support the statement'.</p>
	896 - 3	Gloucestershire County Council	<p>SPD</p> <p>In this section, it would be appropriate to include the need for archaeological assessment of the impact of any proposals for demolition or new development, and the identification of any mitigation required to record those elements of the historic fabric which will be adversely affected'.</p>	Incorporate above into section.	Agree	<p>SPD has been amended to include this. Section 6.2.f. states 'Where proposals are likely to impact on items of archaeological value the Council will require an archaeological assessment of their impact. This should be accompanied by details of mitigation required to record those elements of the historic fabric which will be adversely affected.'</p>
	896 - 1	Gloucestershire County Council	<p>SPD</p> <p>'The preparation of the Index is to be welcomed, since it will make a substantial contribution</p>	n/a	The Council Welcome the support	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			to the management of Cheltenham Borough's historic environment'.			
	64 - 1	Mr Ken Pollock	<p>SPD</p> <p>Acknowledges the SPD 'will have some development-control effect as it stands, but it contains too few buildings, and is not yet fit to be approved as SPD without considerable improvement to:</p> <p>1). The quality of the descriptions/justifications, and</p> <p>2). The coverage of the nineteenth-century buildings lying outside Conservation Areas (wherein they are already substantially protected from demolition)'.</p>	Improve document in response to comments above.	Disagree - The consultants have surveyed the Borough fully, and where buildings meet the criteria for selection they have been added to the Index. The quality of the descriptions and justifications, used in conjunction with the associated SPD and Local Plan policies, are considered adequate. The Index has resulted from an agreed set of criteria, based on the principles of selection used in assessing buildings for the Statutory List, and all buildings meeting this criteria have been included on the Index. Within the criteria, a list of over 400 buildings would seem to be a practical and manageable number. One respondent feels the list is too long.	No change to the SPD, however since this representation was made, 15 of the 18 new entries added to the draft Index are buildings which are located outside the conservation area.
	1159 - 1	Ms Rose Freeman The Theatres Trust	<p>SPD</p> <p>'We support the draft SPD and the rational guidance contained in the report'.</p>	N/A	The Council welcome the support	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	81 - 1	Dr John Adams Environment Agency	SPD (Comment made by Statutory Consultee) Chief concern relates to the conversion of listed and locally listed buildings when they are located in the floodplain. The SPD does not currently discuss the issue of flood risk and it would be considered useful to include mention of this.	The SPD does not currently discuss the issue of flood risk and it would be considered useful to include mention of this.	The Environment Agency are statutory consultees on all development within a floodplain, including conversions.	No change
3.2	784 - 1	Mr P. Fong Hunter Page Planning Ltd.	SPD The Local Plan is not currently adopted and this should be made clear within the text.	Amend text to make above point clear.	The Local Plan has been Adopted.	No change
3.3	784 - 2	Mr P. Fong Hunter Page Planning Ltd.	SPD 'The final sentence of paragraph 3.3 should be clarified to make it relevant to conservation areas only'.	See above.	Agree	Amend section 3.3 of SPD to 'Any building on the Index, which is within a conservation area, will be seen as one which contributes positively to the conservation area.'
4.4	896 - 2	Gloucestershire County Council	SPD There would generally appear to be little recognition of the potential value of buildings of local interest as repositories of archaeological information, and that this also provides a reason why such buildings merit protection. Section 4.4. should include the value of the archaeology represented by the historic fabric(s) contained in any structure.	Incorporate above into section.	Disagree - The criteria for selection of buildings for the Local Index is based on the principles of selection used in assessing buildings for the statutory list. The statutory listing of buildings relates to the Planning (Listed Buildings and Conservation Areas) Act 1990, and accompanying government guidance set out at PPG15. Archaeology	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
					<p>is dealt with under another Act of Parliament - The Ancient Monuments and Archaeological Areas Act 1979, and accompanying government guidance set out at PPG16. It is therefore not considered appropriate to include buildings and sites of archaeological interest on the Local Index.</p> <p>However, the Heritage White Paper, published by DCMS in March 2007 emphasises the need to develop a holistic approach to the historic environment, and seeks to create a single system for national designation to replace listing, scheduling and registering, based on a special architectural, historic or archaeological interest. If in the future the legislative framework is changed as proposed in the White Paper, the selection criteria for buildings of local interest, included at appendix 2 of the SPD, could be amended to include buildings of archaeological importance.</p>	

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
6.2e	81 - 2	Dr John Adams Environment Agency	SPD Welcome the addition of this paragraph as this will help to encourage the use of renewable energy and energy efficient design.	n/a	n/a	No change.
Appendix 2	896 - 4	Gloucestershire County Council	SPD The revised criteria for inclusion in the list should include those buildings which can make a contribution to the understanding of the archaeology of Cheltenham.	Recommends the appendix is amended accordingly.	Disagree - The criteria for selection of buildings for the Local Index is based on the principles of selection used in assessing buildings for the statutory list. The statutory listing of buildings relates to the Planning (Listed Buildings and Conservation Areas) Act 1990, and accompanying government guidance set out at PPG15. Archaeology is dealt with under another Act of Parliament - The Ancient Monuments and Archaeological Areas Act 1979, and accompanying government guidance set out at PPG16. It is therefore not considered appropriate to include buildings and sites of archaeological interest on the Local Index. However, the Heritage White Paper, published by DCMS in March 2007 emphasises the need to	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
					develop a holistic approach to the historic environment, and seeks to create a single system for national designation to replace listing, scheduling and registering, based on a special architectural, historic or archaeological interest. If in the future the legislative framework is changed as proposed in the White Paper, the selection criteria for buildings of local interest, included at appendix 2 of the SPD, could be amended to include buildings of archaeological importance.	

Representations for Index of Buildings of Local Interest

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	120 - 1	Mr A. Miller	INDEX Would like to nominate various buildings, including Eagle Tower, to be added to the Local Index	Include Eagle Tower on the draft Local Index	Disagree - Eagle Tower, Bath Road, is a late twentieth century building, and a local, but not necessarily popular, landmark. However, it does not meet the criteria for either design merit or historic interest necessary for inclusion on the Index.	No change
	25 - 1	Mr D. Thomas	INDEX Item No. 213 - no. 7 Churchill Road Objecting to property being placed on Index due to criteria used.	Remove property from Index.	Disagree - the house is one of a row of dwellings built with an unusual glazed brick that is a distinctive characteristic of the area, worthy of note.	No change
	1335 - 1	Mr M Webber	INDEX 'The cemetery is still in use and contains graves from early 19th century to date'.	Not stated.	Agree	Amend description of Item no. 237 - Jewish Burial Ground, Elm Street, to include 'The cemetery is still in use today and contains graves from early 19th century to date.'
	1335 - 2	Mr M Webber	INDEX Concern about the poor physical condition of the two buildings on the Index, Item No. 63 - Engine House, St James Square and	'Not so much a change to the document with whose sentiments I agree, but a change in the Council's policy so that it makes use	Noted - The Council's Enforcement department are actively exploring the full range of powers under planning legislation to	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			Item No. 64 - Fire Station, St James Square.	of the powers it already possesses to enforce action or through the use of a CPO'.	require the building to be completed/restored/devoid of scaffolding.	
	1336 - 1	Mr JM Lancashire Dean Close School	INDEX Objection to inclusion of Item No. 331 - 25 Hatherley Road and Item No. 304 - 73 Lansdown Road on the Index.	Request for the grounds of inclusion of these buildings to be reviewed.	Agree in part 25 Hatherley Road - Agree - An error in numbering has occurred. It is in fact no. 52 Hatherley Road which merits inclusion, not number 25. 73 Hatherley Road - Disagree - Though extended and modified the building still merits inclusion on the Index.	Amend Item number 331 on Index to read number 52 Hatherley Road, not number 25 Hatherley Road. No change to Item No. 304 - 73 Lansdown Road
	1336 - 2	Mr JM Lancashire Dean Close School	INDEX The inclusion of Item No. 305 - Fortfield, 69 Lansdown Road & Item No. 306 - Wilton Lansdown Road on the Index seems reasonable.	None	Agree	No change
	1159 - 2	Ms Rose Freeman The Theatres Trust	INDEX Request to include the former Coliseum in Albion Street on Index (now vacant Springbok bar).	Include former Coliseum building, Albion Street (Springbok) on Index.	Agree - The building dates from 1913, but now much altered. However, it holds a prominent position in the street scene and externally retains much of its historic façade.	Add Former Coliseum building in Albion Street (Springbok) to draft Index, as Item No. 452.
	64 - 6	Mr Ken Pollock	INDEX The writer believes the Local	Local Index should be much fuller in breadth and	Disagree - The Borough has been fully surveyed.	No change.

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			Index could have been much fuller in breadth (of buildings covered) and depth (of architectural details documented). 'Instead, it wastes scarce berths on e.g. too much appropriately-sited 'modernism' such as Century Court and on too much relative trivia (e.g. bollards)'.	depth. Wants there to be 'some declaration now that the Local List's general problems of coverage and quality will be addressed'.	The Index has resulted from an agreed set of criteria, based on the principles of selection used in assessing buildings for the Statutory list, and all buildings meeting the criteria have been included on the Index. Within the criteria, a list of over 400 buildings would seem to be a practical and manageable number. One respondent feels the list is too long.	
	792 - 2	Mr. I. Ferguson Trustees of the Battledown Estate	INDEX At a future date, would like to suggest other buildings to be placed on Index.	None.	The review procedure for future nominations is set out at paragraph 4.8 of the Report to Council, to be agreed at full Council.	No change
	1342 - 4	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the buildings on the draft Index. Comments mainly question why these buildings are on the Index.	Removal of certain letterboxes on Index	Disagree - Though small and apparently insignificant, letterboxes add to the local distinctiveness of a place and merit inclusion.	Review comments and amend comments of Index as appropriate.
	64 - 2	Mr Ken Pollock	INDEX 'It appears that the current List done by Conservation Studio has not made any use whatsoever of the immediately preceding List done by architectural historian Oliver Bradbury'. To illustrate this point, the writer has provided	'The Oliver Bradbury text is far more learned and is more useful for defending the building against insensitive alterations. In contrast the Conservation Studio's text contains far fewer details and makes much use (generally) of	Disagree - The Conservation Studio were aware of the preceding work by Oliver Bradbury. The associated SPD and Local Plan policies clearly explain the level of protection to buildings on the Index.	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			comparisons between the Conservation Studio and Oliver Bradbury's lists.	imprecise terms such as "distinctive", which could prove of little weight before an Appeal Inspector. The Bradbury quality of assessment should still be incorporated'.		
	64 - 3	Mr Ken Pollock	INDEX A key area of threat is the nineteenth-century district between Church Road (St. Mark's) and Gloucester Road. Writer believes 'these are the most threatened areas where thin coverage really hurts conservation'.	This area needs to be further acknowledged within the Index.	Disagree in part - The area of the Borough referred to has been fully surveyed, and only where buildings meet the selection criteria were they added to the draft Index. Agree in part - Further to a re-survey of certain buildings in this area of the town, Item No. 462 - 271 Gloucester Road & Item No. 461 - 269 Gloucester Road have been added to the draft Index.	Item No. 462 - 271 Gloucester Road & Item No. 461 - 269 Gloucester Road have been added to the draft Index.
	64 - 4	Mr Ken Pollock	INDEX Concerned that Cotswold House in Fauconberg Road is not on the Index, nor is it highlighted as a 'positive' building in the Bayshill Character Appraisal SPD.	Local Index should be much fuller in breadth and depth. Wants there to be 'some declaration now that the Local List's general problems of coverage and quality will be addressed'. Add Cotswold House in Fauconberg Road.	Cotswold House lies within the curtilage of a listed building and is therefore protected by listed building legislation.	No change.
	64 - 5	Mr Ken Pollock	INDEX Notes errors of detailed fact:	Amend errors accordingly	Agree	Description of Item No. 309 - Old School House,

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			<p>1. Item No. 309 - Devonshire Street School is by D. J. Humphris not W. H. Knight.</p> <p>2. The Pittville Lake Boathouse is earlier than c1930.</p>			<p>Devonshire Street amended to read 'Former Charity School, converted to housing in 1993. 1846-7 by D.J. Humphris...'</p> <p>Date of Item No. 9 - Boathouse in Pittville Park, Evesham Road, amended to read 'early C20'.</p>
	1006 - 1	CLlr Robin MacDonald	INDEX Nominated Moat Cottage, Kidnappers Lane & Field Cottage, Kidnappers Lane, to go on Index	Nominated Moat Cottage, Kidnappers Lane & Field Cottage, Kidnappers Lane, to go on Index	Disagree - both buildings are statutory listed grade II and are therefore protected by listed building legislation	No change
	1193 - 1	Mr David Gardiner	INDEX Objecting to Item No. 373 - 224 London Road being placed on Index. Owner states that "there are several others in the row which are not on the draft Index yet are just as important historically and architecturally."	Remove property from Index.	Disagree with removal of no. 224 London Road from draft Index, but agree with logic of adding others in the row. Numbers 224, 228 and 230 London Road were included on the Index as the best representatives of a row of good quality c1900 town houses, and it is logical to include the others in the row.	Add numbers 214, 216, 218, 220/222 and 226 London Road to draft Index.
	792 - 1	Mr. I. Ferguson Trustees of the Battledown Estate	INDEX '...generally supports the representations we have made in the past ...'.	None	The Council Welcomes the support	No change.
	525 - 1	Mr B. J. Simon Swindon Village	INDEX Wants to see 'The Homestead,	Add The Homestead, Hayden Road, Swindon	Agree	Add The Homestead, Hayden Road, Swindon

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
		Society	Hayden Road, Swindon Village' included on Index in conjunction with Guy Bentham Hill's letter dated 31.01.03.	Village to draft Index.		Village to draft Index, as Item No. 454.
	1194 - 1	Mr Denis Williams	INDEX Supports inclusion of Item No. 85 - Post WWII pre-fabricated houses, Cakebridge Place on Local Index.	n/a	Disagree - The buildings have been much altered and have lost a great deal of their historic interest.	Remove Item No. 85 - Post WWII pre-fabricated houses, Cakebridge Place from Index.
	1195 - 1	Ms Susan Marsh	INDEX Factual inaccuracy in description of Item No. 125 - Lower Mill, Mill Street, Prestbury. The mill is not the last surviving mill in the area.	Amend description of Item No. 125	Agree	Justification of item No. 125 amended to read "The building makes a positive contribution to Prestbury Conservation Area and the varied townscape of the Borough. A reminder of the rural beginnings of Prestbury and one of the last surviving mills in the area."
	1196 - 1	Mr Martin Page dha planning	INDEX Objecting to inclusion of Item No. 224 - Media Centre, Pittville Campus, University of Glos on Local Index	Removal of Media Centre, Pittville campus (Item No.224) from draft Index.	Agree - Buildings less than 30 years are not normally Statutorily listed and this criteria should apply to the Index	Remove Media Centre, Pittville campus (Item No. 224) from draft Index. Also remove all other buildings of less than 30 years from Index, therefore remove Student accommodation, Pittville Campus (Item No. 225) & Century Court, Bath Road (ref. 182) from draft index.
	1197 - 1	C.G. Dickinson St.	INDEX	Not stated	Agree - This wall is	Remove Item No. 142 -

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
		Edwards School	Factual inaccuracy in ownership of Item No. 142 - Wall along Moorend Road. Believes that the wall is curtilage listed.		curtilage listed as it formed the curtilage of a grade II* listed building at the date of listing. It is therefore protected by listed building legislation.	Wall along Moorend Road from Index.
	1198 - 1	Mr Brian Hughes	INDEX Objection to inclusion of Item No. 199 - 57 Leckhampton Road on Local Index.	Remove 57 Leckhampton Road (Item No. 199) from Index.	Disagree - This building, like many other early/mid 19th century houses in Leckhampton Road, meets the criteria for inclusion.	No change
	1188 - 1	Mr William Macleod	INDEX Item No. 148 Objecting to house being placed on draft Index due to security point of view and number of modern alterations.	Removal of Ashley Rise, Ashley Road (ref. 148) from draft Index	Disagree - Though altered the building retains its historic character and appearance and still merits inclusion.	No change
	1334 - 1	Mr and Mrs MJ and RK Richards	INDEX Objection to Item No. 333 - 11 Hatherley Court Road being placed on Index, and concern photo of property was published on website without owner's permission.	Removal of 11 Hatherley Court Road (Item No. 333) from draft Index.	Disagree - The house is a good representative of its type and the least altered in the area.	No change
	1190 - 1	Mr Brian Hall	INDEX Address incorrect for Item No. 124 - Should read United Reformed Church, DEEP ST, Prestbury NOT United Reformed Church, HIGH ST, Prestbury	Amend address	Agree	Amend address of Item No. 124 to United Reformed Church, Deep Street, Prestbury.
	1196 - 2	Mr Martin Page dha	INDEX Objection to inclusion of	Remove Item No. 225 -	Agree - Buildings less than	Remove Item No. 225 -

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
		planning	Item No. 225 - Student Accommodation, Pittville Campus, Uni of Glos. on draft Index.	Student Accommodation, Pittville Campus, Uni of Glos. on draft Index.	30 years are not normally Statutorily listed and this criteria should apply to the Index	Student Accommodation, Pittville Campus, Uni of Glos. From draft Index. Also remove all other buildings of less than 30 years from Index, therefore remove Media Centre, Pittville Campus (Item No. 224) & Century Court, Bath Road (ref. 182) from draft index.
	1199 - 1	Mr and Mrs George Sherratt	INDEX Factual inaccuracies in description of Item No. 399 - Coach House, Water Lane.	Amend description of building as suggested.	Agree	Description changed to read "Coach House or early garages, now used as garages. Early 20C. Simple brick rectangle with carriage opening on the ground floor and a door into the loft located high up in the gable. Decorated barge boards. Originally associated with a large house that was knocked down to develop the estate. Early 20C."
	1200 - 1	Mr Brian Wright	INDEX Address incorrect	Amend address from 30-34 Brookway Road to 28-32 Brookway Road.	Disagree - The buildings of interest are 30-34, although it would be more appropriate if number 34 Cudnall Street was included on the Index as a separate entry as it is detached. 30 & 32 Cudnall Street are terraced and therefore are included as	Amend address of Item No. 388 to 30 & 32 Brookway Road. Create new Item No. 444 - 34 Cudnall Street.

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
					one entry.	
	914 - 1	Mr Dan Washington GL Hearn Ltd	INDEX Object to inclusion of Item No. 134 - Delancey Hospital on draft Index due to concern that inclusion on Index placed constraints on building and the building is not of sufficient quality to include inclusion on the statutory list.	Remove item No. 134 - Delancey Hospital from draft Index.	Disagree - the building is a good local example of a brick-built Victorian hospital.	No change
	1342 - 1	Mr John Henry Cheltenham Civic Society	INDEX Concern that the Index offers no greater protection for buildings and the list will give the 'false impression of greater protection'.	Not stated.	Disagree - The associated SPD and Local Plan policies explain the level of protection to buildings on the Index.	No change
	1342 - 2	Mr John Henry Cheltenham Civic Society	INDEX Concern that energy should be concentrated on protecting the statutory listed buildings. Protecting more buildings via the Index may weaken the level of protection. 'Bold and innovative new designs will be lost as developers will spend too much effort trying to design round or modify existing buildings...'	Not stated	Disagree - Cheltenham Borough Council is following Government advice (Paragraph 6.16 of PPG15) that "it is open to Planning Authorities to draw up lists of locally important buildings".	No change
	1342 - 3	Mr John Henry Cheltenham Civic Society	INDEX Objection to present size of Index.	Suggest the list should be reduced in size so that 'the pleasant but unexceptional buildings quite likely to be redeveloped are excluded	Disagree - The Index has resulted from an agreed set of criteria, based on the principles of selection used in assessing buildings for	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
				from it'.	the Statutory List, and all buildings meeting this criteria have been included on the Index. Within the criteria, a list of over 400 buildings would seem to be a practical and manageable number. One respondent feels the list is too short.	
	64 - 7	Mr Ken Pollock	<p>INDEX</p> <p>There are far fewer properties in Hatherley Road contained in the Conservation Studio's list, compared to Oliver Bradbury's version. Most of the buildings nominated by Up Hatherley residents and Parish Council have been either disregarded or discarded, with no explanation.</p>	Believes that more properties in Hatherley Road and Up Hatherley in general should be included.	Further to the submission of this representation during the consultation period, certain buildings in Up Hatherley have been re-surveyed, and added to the Index.	<p>The following two Hatherley Road Index entries have been deleted from the draft Local Index: Item No. 369 - 235-239 Hatherley Road and Item No. 331 - 25 Hatherley Road. These were added as a result of an error in numbering and do not merit inclusion.</p> <p>The following buildings in Up Hatherley have been added to the draft Index since this representation was made: Item No. 455 - 217-223 Hatherley Road; Item No. 457 - Woodbines House, Sunnyfield Lane; Item No. 459 - Greenwode Leghe, Cold Pool Lane; Item No. 458 - Up Hatherley Village Hall and gates, Cold Pool Lane; Item No. 460 - Avenue Lodge, Chargrove</p>

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
						Lane; Item No. 456 - Brakeville, Hatherley Road & Item No. 331 - 52 Hatherley Road.
	1189 - 1	Mr Nicholas Tee	INDEX Item Ref. 414 - Old School House, Leckhampton Road - Description of building inaccurate.	Either 'delete the property or have a separate and accurate entry for this separate property'	Agree that the Index should include two separate and accurate entries for each building - No. 3 Leckhampton Road and The Old School House, Leckhampton Road.	Create a separate entry for each building, with a revised description for each. Item No. 414 - 3 Leckhampton Road is now described "Former school. 1864. Stone, Tudor Gothic, two storeys with bellcote. Tripartite first floor window with drip mould. Five-light window beside front door at ground floor. Additional schoolroom to left is listed separately, of 1873, probably by John Middleton. Educational; mid 19C. Item No. 500 - The Old School House, Leckhampton Road is now described "Former school house. 1873, probably by John Middleton attached to school of 1864. Five-light 'gothic' window facing Leckhampton Road. Educational; late 19C."
	342 - 22	Mr John Henry Cheltenham Civic	INDEX Item No. 454 - The Homestead,	None stated	Disagree - Though much altered, the building's	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
		Society	Newlands View - Too altered to justify inclusion.		timber framing gives it significant local interest. It marks the site where a mill has been for at least 800 years.	
	913 - 4	Ms Mary Nelson	INDEX Request for several more buildings in Up Hatherley to be added to Index.	Add Brakeville, Hatherley Road to Index	Agree	Item No. 456 - Brakeville, Hatherley Road, added to Index
	913 - 5	Ms Mary Nelson	INDEX Request for several more buildings in Up Hatherley to be added to Index.	Add Avenue Lodge, Chargrove Lane to the Index.	Agree	Item No. 460 - Avenue Lodge, added to Index
	913 - 6	Ms Mary Nelson	INDEX Request for reasons why other buildings in Up Hatherley, which were nominated to be added to Index, were not.	None stated	Agree in part	<p>Further to the public consultation the nominated buildings in Up Hatherley were re-visited.</p> <p>7 further buildings in Up Hatherley/Hatherley were added to the Index, including Item No. 455 - 217-223 Hatherley Road; Item No. 457 - Woodbines House, Sunnyfield Lane; Item No. 459 - Grenwode Leghe, Cold Pool Lane; Item No. 458 - Up Hatherley Village Hall and gates, Cold Pool Lane; Item No. 460 - Avenue Lodge, Chargrove Lane; Item No. 456 - Brakeville, Hatherley Road and Item</p>

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
						No. 331 - 52 Hatherley Road. A list of nominations received is set out in the appendices of the Council Report.
	913 - 7	Ms Mary Nelson	INDEX Supports the addition of the 18 entries to the Index following public consultation.	None	N/A	No change
	342 - 18	Mr John Henry Cheltenham Civic Society	INDEX 'we believe that the value of the list is likely to be inversely related to its length, and further additions are not something we necessarily welcome'.	Request that the Council bear this in mind	Disagree - The Index has resulted from an agreed set of criteria, based on principles of selection used in assessing buildings for the Statutory list, and all buildings meeting this criteria have been included on the Index. Within the criteria, a list of over 400 buildings would seem to be a practical and manageable number. One respondent feels the list is too short.	No change
	342 - 19	Mr John Henry Cheltenham Civic Society	INDEX Regarding Item No. 452 - Former Coliseum Cinema, Albion Street. 'We acknowledge its historical importance, but do worry that it is now so degraded that it might not be worth preserving. Is it right for its historic interests, which can be commemorated other than by preservation of the building, to	None stated	Disagree - This building was nominated during the public consultation period, following the publication of the first draft of the Index. The nomination was made by the Theatres Trust and included information on the history of the building. This information was forwarded to the consultants, The	Amend justification for Item No. 452 - Former Coliseum Cinema to read: 'The former theatre and cinema relates to the social and cultural history of the town, has a distinctive inter-war cinema style and is a notable presence in the street scene.'

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			be the sole reason for the preservation of a tired building well past its sell-by date?		Conservation Studio, who felt it met the criteria for inclusion. As a former theatre and cinema it relates to the social and cultural history of the town, has a distinctive inter-war cinema style and is a notable presence in the street scene.	
	1341 - 1	Mrs E. Allen & Mrs H. Luxton Swindon Village Society History Project	INDEX Commented that Apple Tree Cottage, which is a thatched cottage which was village blacksmith, has no protection as far as writer knows.	Not stated but consider inclusion on Local Index	Apple Tree Cottage is statutory listed grade II and therefore protected by listed building legislation.	No change
	342 - 21	Mr John Henry Cheltenham Civic Society	INDEX Item No. 455 - 217-223 Hatherley Road - Buildings are not sufficiently distinctive and history not sufficiently unusual to merit inclusion.	None stated	Disagree - As part of a row of houses built to accommodate the Paragon Laundry workers, these buildings have local historic significance.	No change.
	342 - 17	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove 12 & 12A Tivoli Street from Local Index	Disagree - These are good and relatively unspoiled representatives of this type of terraced dwelling.	No change
	342 - 23	Mr John Henry Cheltenham Civic Society	INDEX Item No. 453 - Lamp post at 29 Park Place - welcome s the inclusion on the Index	None	The Council welcomes the support	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	342 - 24	Mr John Henry Cheltenham Civic Society	INDEX Item No. 457 - Woodbines House - No architectural or aesthetic reason for inclusion. Historical justification tenuous.	None stated	Disagree - The building has local historic interest as one of the oldest cottages in the Parish of Up Hatherley and a former meeting place of the Parish Council.	No change
	342 - 25	Mr John Henry Cheltenham Civic Society	INDEX Item No. 331 - 52 Hatherley Road - Oppose the inclusion of one half of a pair of semi-detached houses.	Not stated	Disagree - The selection criteria includes buildings 'Good examples of well designed domestic buildings which retain their original details and materials'. If one half of a semi-detached property is in a more original state, it is reasonable to only include the one property.	No change
	1008 - 1	Cllr Anne Regan	INDEX Disappointed that One-Stop-Shop, Alma Road has not been included on the Index.	None stated	Disagree - The building has been much altered and most of its architectural interest has been lost.	No change
	1363 - 1	Kathryn Oakey Up Hatherley Parish Council	INDEX The Parish Council would like to add its support to the updated Index	None	The Council welcomes the support	No change
	1365 - 1	Mr David Williams Ramsdens Chartered Surveyors	INDEX Does not believe Item No. 452 - Former Coliseum Cinema, Albion Street should be included on the Local Index. Feels that if it was worthy of being included	Not stated - but implies that building should be removed from Index.	Disagree - This building was nominated during the public consultation period, following the publication of the first draft of the Index. The nomination was made	Amend justification for Item No. 452 - Former Coliseum Cinema to read: 'The former theatre and cinema relates to the social and cultural history

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			on the Index it would have been included on first draft prior to public consultation.		by the Theatres Trust and included information on the history of the building. This information was forwarded to the consultants, The Conservation Studio, who felt it met the criteria for inclusion. As a former theatre and cinema it relates to the social and cultural history of the town, has a distinctive inter-war cinema style and is a notable presence in the street scene.	of the town, has a distinctive inter-war cinema style and is a notable presence in the street scene.'
	342 - 20	Mr John Henry Cheltenham Civic Society	INDEX Comments that the inclusion of Item No. 458 - Up Hatherley Village Hall and gates on the Index is entirely historic and not aesthetic.	None stated	This building, as a war memorial built by public subscription, is an important feature of the social and community history of the locality, and is therefore worthy of inclusion on the Index.	No change
	342 - 10	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 168 - Forge, Exmouth Street from Index.	Agree - In comparison with the quality of other buildings on the Index, this does not merit inclusion.	Remove Item No. 168 - Forge, Exmouth Street from the draft Index.
	120 - 2	Mr A. Miller	INDEX Would like to nominate various buildings to be added to the Index, including Barratts Mill and Millpond.	Add Barratts Mill and Millpond to the draft Index	Disagree - The Mill has been much altered externally and has been converted to residential use.	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	120 - 3	Mr A. Miller	INDEX Would like to nominate various buildings to be added to the Local Index, including various old buildings in the High Street (287-293 High Street; 332-334 High Street - Irish Oak; 340 High Street; 368-372 High Street; 423-425 High Street; 427 High Street; 429-431 High Street).	Add these buildings to the draft Index.	Disagree - Some of these buildings have been demolished and others, whilst dating from the early 19th century, have either been much altered or are not of sufficient architectural quality to merit inclusion on the Index.	No change
	120 - 4	Mr A. Miller	INDEX Would like to nominate various buildings to be added to the Index, including The Restoration Inn, High Street & The Swan, High Street	Include The Restoration Inn, High Street & The Swan, High Street on the draft Local Index.	Disagree - Both of these buildings are grade II statutory listed and are therefore protected by listed building legislation.	No change
	1342 - 5	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Removal of various lamp-posts on the Index	Disagree - Though small and apparently insignificant, historic lamp-posts add to the local distinctiveness of a place and merit inclusion.	No change
	1342 - 6	Mr John Henry Cheltenham Civic Society	INDEX various comments on 12 of the buildings on the draft Index. Comments mainly question why these buildings are on the Index.	Request to add to Index a lamp-post opposite 29 Park Place	Agree	Add lamp post to Index - Item No. 453
	1342 - 7	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why	Removal of Item No. 85 - Post WWII pre-fabs at Cakebridge Place from Local Index.	Agree - The buildings have been much altered and have lost a great part of their historic interest.	Remove Item No. 85 - Pre-fabricated houses at Cakebridge Place from Index.

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			these buildings are on the Index.			
	913 - 3	Ms Mary Nelson	INDEX Request for several more buildings in Up Hatherley to be added to Index.	Greenwode Leghe, Cold Pool Lane to be included on the Index	Agree	Item No. 459 - Greenwode Leghe, Cold Pool Lane added to Index
	1342 - 9	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 134 - Delancy Hospital from Index	Disagree - The building is a good local example of a brick-built Victorian Hospital.	No change
	913 - 2	Ms Mary Nelson	INDEX Request for several more buildings in Up Hatherley to be added to Index.	Up Hatherley Village Hall to be included on the Index	Agree	Item No. 458 - Up Hatherley Village Hall and gates included on Index
	342 - 11	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 181 - Lindley gate piers, College Road from the Index	Agree - The gate piers are statutory grade II listed, and are therefore protected by the listed building legislation.	Remove Item No. 181 - Lindley gate piers, College Road from the draft Index.
	342 - 12	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 287 - Victoria Mansions, Malvern Road from the Index	Disagree - Victoria Mansions has local architectural value and historic interest.	No change
	342 - 13	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 331 - 25 Hatherley Road from the Index	Agree in part - There has been an error in numbering. Item No. 331 should be number 52 Hatherley Road, not number 25. The picture in the Index is correct and	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
					we believe that the representation was made with regard to number 52, however, this building is of architectural and historic interest and should remain on the Index.	
	342 - 14	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 333 - 11 Hatherley Court Road from the Index.	Disagree - The house is a good representative of its type and the least altered in the area.	No change
	342 - 15	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 369 - 235-239 Hatherley Road from Index	Agree - Numbers 235-239 do not merit inclusion. This entry is an error in house numbers. The buildings that do merit inclusion are actually numbers 217-223 Hatherley Road.	Remove Item No. 369 - 235-239 Hatherley Road from Index. Add Item No. 455 - 217-223 Hatherley Road to Index.
	342 - 16	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index. Comments mainly question why these buildings are on the Index.	Remove Item No. 418 - 3-6 Tivoli Street from Local Index.	Disagree - 3-6 Tivoli Street are good and relatively unspoiled representatives of this type of terraced dwelling.	No change
	64 - 8	Mr Ken Pollock	INDEX Supports the addition of 18 new buildings to the revised draft Index.	None	The Council welcomes the support	No change
	1342 - 8	Mr John Henry Cheltenham Civic Society	INDEX Various comments on 12 of the entries on the draft Index.	Remove Item No. 87 - Axiom, Winchcombe Street, from Index.	Disagree - The building has interesting brickwork and considerable presence in	No change

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			Comments mainly question why these buildings are on the Index.		the street scene	

Representations for Index of Buildings of Local Interest - SPD (SEA)

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
	896 - 4	Gloucestershire County Council	'Whilst the adopted County Structure Plan is mentioned in the relevant plans listed in Appendix 1, this does not mention the most relevant policy, NHE.6, relating to the protection of the historic environment'.	'I therefore recommend that this policy is added, both to the appendix and Section 4 of the Environmental Report'.	The adopted County Structure Plan is included within Appendix 1 of the main SEA report and also section 4 of the Environmental Report.	No change
	896 - 2	Gloucestershire County Council	Include the Draft Regional Spatial Strategy in the Regional Plans, Policies & Programmes	Include the Draft Regional Spatial Strategy in the Regional Plans, Policies & Programmes	Agree, amend Appendix 1 of main SEA report to include the draft RSS.	The draft RSS has been included within Appendix 1 of the main SEA report.
	1166 - 1	Mr Ross Simmonds English Heritage	'Whilst we broadly support the compilation of the Index and the creation of the SPD, at this stage we have no additional comments to make'.	n/a	The Council welcome the support	No change
	1 - 1	Ms Alison Rood Natural England	No comment	n/a	n/a	No change
	784 - 1	Mr P. Fong Hunter Page Planning Ltd.	'Redrow notes that the SA was undertaken by the Council's Urban Design Team. Best practice on SA states that it should be an iterative process and involve a wide range of stakeholders'.	Not stated.	The SA process was undertaken by the Council's Urban Design Team in association with the Strategic Land Use and Sustainability teams. The LDF project management board were also part of this	No change.

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
					process. Everyone on the LDF database was also informed that this process was taking place and comments were invited before the formal consultation stage.	
	896 - 3	Gloucestershire County Council	PPG16 should be mentioned in the list of relevant plans contained in this section and within the environmental report.	Incorporate above into section.	PPG16 is included within Appendix 1 of the main SEA report, and also within section 4 of the Environmental Report.	No change
	81 - 6	Dr John Adams Environment Agency	Considers the format of the Measuring Tool to be a clear and accessible way of presenting the information.	Just comment.	The Council welcomes this support.	No change.
	896 - 5	Gloucestershire County Council	'The intent of the table comprising Appendix 2 of the Environmental Report is not clear. However, in respect of buildings at risk and Scheduled Monuments it is stated that there is 'too little information available to obtain an accurate picture'.	'I recommend that information concerning these should be sought from English Heritage so that the content of the table may be completed'.	Agree	This information has been provided by English Heritage and has been incorporated within Appendix 2 of the main SEA report.
	81 - 2	Dr John Adams Environment Agency	The summary of PPS 1 should include 'the protection and enhancement of the environment' and 'the prudent use of natural resources' as key objectives alongside the economic and social aspects. This is a truer picture of PPS 1	Incorporate above into section.	Agree	Appendix 1 has been updated with reference to PPS1 to include, "The protection and enhancement of the environment, the prudent use of natural environment economy and society are

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			and sustainable development, as these 4 principles need to work together to achieve it.			the 4 key principles of the document. These 4 principles need to work together to achieve sustainable development.
	784 - 2	Mr P. Fong Hunter Page Planning Ltd.	The Local Plan is not currently adopted and this should be made clear within the text.	Text should be amended to clarify the status of the Local Plan.	The Local Plan has been adopted and will remain as such unless the High Court rules otherwise.	No change
1. Biodiversity	81 - 3	Dr John Adams Environment Agency	This criteria should include 'protect and enhance flora and fauna'. This is because it is important for these features to be protected whether they are part of nature conservation designations or not.	Incorporate above as requested.	Agree	Amend wording within paragraph 5.2 to read, To protect and enhance designated wildlife habitats and species. Also amend objective 1 of appendix 3 of SEA report to read To protect and enhance designated wildlife habitats and species
3. Flood Risk	81 - 4	Dr John Adams Environment Agency	There is a need to have flood risk as a separate Corporate Priority. There is a potential to use the percentage of developments approved against EA advice on flood risk as an indicator of trend.	Incorporate above into text. Environment Agency link provided.	Agree	The reduction of flood risk is one of the main SEA objectives. Welcome the EA information provided. This has been removed from the generic title of the environment and given its own section within the section on baseline information following 3i.
5.2 Env. Report	81 - 1	Dr John Adams Environment Agency	The SPD and the sustainability measure should aim to protect all local wildlife and species, not	Aim to protect all wildlife and species not just those with designations or with	Agree, amend wording.	Amend wording within paragraph 5.2 to read, To protect and enhance

Para	Ref No	Organisation name	Summary of comment	Change requested	Council's response	Council's proposed action
			just those that are subject to designations or with protected status.	protected status.		designated wildlife habitats and species. Also amend objective 1 of appendix 3 of SEA report to read To protect and enhance designated wildlife habitats and species
6.1 (row 9)	896 - 1	Gloucestershire County Council	Questioning what the SPD is contributing to Cheltenham's Town Centre	Explain how the SPD will contribute to the vitality and viability of Cheltenham's town centre.	Implementing the SPD will afford greater protection to those buildings on the Local Index which might otherwise be destroyed. The retention of locally important buildings in and around the town centre can play an important role in retaining the special character of Cheltenham's town centre.	No change
7. Climatic Factors	81 - 5	Dr John Adams Environment Agency	This criteria should include 'the reduction of waste going to landfill'.	Include above within criteria.	Agree	Under climatic factors the reduction of waste going to landfill has been included as a criteria
Appendices 3 & 4	896 - 6	Gloucestershire County Council	Notes the SPD will protect and enhance the historic environment, and also promote education and access to built heritage and archaeology. In the comments section of this table, archaeology is not mentioned.	Recommends that the comments in respect of both measuring tools should be amended accordingly.	Agree	Archaeology has been included within the comments section of the SEA matrix and a new indicator has been included within the baseline section of the SEA report.

Index of Buildings of Local Interest Supplementary Planning Document Statement of Compliance with the Statement of Community Involvement (SCI)

1. This statement has been prepared to record the consultation process undertaken by Cheltenham Borough Council in the preparation of:

- Index of Buildings of Local Interest Supplementary Planning Document

2. This statement corresponds to the requirements under the Town and Country Planning (Local Development) (England) Regulations 2004.

3. The Council has employed a range of methods to ensure that the widest public awareness of the Supplementary Planning Document has been achieved and to facilitate a high level of participation and response. These various approaches were integrated into a six week consultation period, running from Friday 10th November 2006 to Friday 22nd December 2006.

Media

In November 2006, the Council placed appropriate statutory notices in the local press in the form of adverts and a press release.

Consultation with interested bodies

In June 2005 the Borough Council commissioned outside consultants called The Conservation Studio to compile the Local Index. Prior to the consultants surveying the borough they invited interested parties e.g. Ward and Parish Councillors; representatives from Cheltenham Civic Society and local and national interest groups, to nominate buildings.

Meetings/Exhibitions

A public meeting/exhibition was held at Cheltenham Town Hall on Saturday 18th November, as part of the Cheltenham 2020 event, where the Index was the subject of a display. This offered members of the public to look at the Index and draft SPD and put questions to the Council's conservation officers.

Statutory and Non-Statutory Consultees

All the relevant statutory and non-statutory consultees and others who had expressed an interest in the Local Index were notified by letter of the consultation process. This consultation included a letter sent to the owner/occupier of each property on the Index, public notices in the Gloucestershire Echo and notification of all those on the LDF consultation database. The letter included details of how they could respond to the SPD, and who to contact for further information. This formal consultation was supported by publicity on the Council's website and local press coverage.

Printed copies of the SPDs

The Council made printed copies of the SPD, Environmental Report and this Statement of Compliance available for inspection at the Municipal Offices, Cheltenham libraries and neighbourhood resource centres.

Website

The draft SPD was also available via the Council website – www.cheltenham.gov.uk. This included copies of the draft SPDs which could be downloaded, contact details for queries and a reply facility to send comments direct to the Council via email.