



CHEL TENHAM
BOROUGH COUNCIL

Cheltenham Plan
(Part One):
Preferred Options

**Consultation
Statement**

Planning Policy

July 2017

Introduction

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

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



Deposit locations for hard copies of the consultation documents, in Cheltenham and Bishops Cleeve.

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

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

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



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

Public consultation events for the Cheltenham Plan

Location	Date	Duration
Leckhampton Village Hall	16 th February	3-7pm
Oakley Community Resource Centre	20 th February	3-7pm
Prestbury Library	7 th March	3-7pm
Regents Arcade	11 th March	10am-3pm
Hester's Way Community Resource Centre	14 th March	3-7pm

Overview

The questionnaire consisted of 15 questions which focussed on preferred policies for the economy, green space, and future development sites. The preferred options were generally met with approval, with over 70% of respondents agreeing with the Vision Themes and Objectives, economic strategy, and employment proposals. Policies protecting the Honeybourne Line and Local Green Spaces (LGS) were well received, whereas proposals for future housing development sites were less popular. See appendix 1 for summary of responses to all questions.

192 postcards were received by respondents supporting the protection of LGS at Leckhampton. The postcard, produced by Leckhampton Green Land Action Group (LEGLAG), asked respondents whether they agreed with the parish council's proposed LGS boundaries.

Several respondents expressed concerns over proposed housing developments, particularly Reeve's Field and Prior's Farm. The JCS strategic allocations in the West and North West of Cheltenham were also commented upon despite the principle of development of these sites being an issue outside the remit of the Cheltenham Plan.

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

Vision & Objectives (Question 1)

The Vision Themes and Objectives received approval from 76% of respondents. Several consultees who responded 'no' when asked whether they agreed with the Vision and Objectives, went on to state in the comments that they actually generally agreed with most of the proposals. Some consultees took issue with Section 2.3 Vision Theme C, stating that the



Cotswold Area of Outstanding Natural Beauty (AONB) should be referenced explicitly in this section.

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

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

Question	Yes	No
Do you agree with the Preferred Strategy for the economy?	52	5
Do you agree with Proposed Policy EM1 Safeguarding Key Existing Employment Land and Buildings?	54	5
Do you agree with Proposed Policy EM2 Safeguarding Non-Designated Existing Employment Land and Buildings?	52	5
Do you agree with Proposed Policy EM3 New Employment Allocations?	43	14
Do you agree with Proposed Policy EM4 Promoting the Cyber-Security Sector?	51	4
Do you agree with Proposed Policy EM5 Protecting the Route of the Former Honeybourne Rail Line?	63	5

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

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

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

The proposed EM3 policy designates new sites as employment allocations, whilst still popular amongst respondents (75%), several comments raised concern over Grovefield Way. Consultees state that no further incursions into the Green Belt should



occur, and that no retail uses are required at this site. The decision to remove this site from the Green Belt is part of the JCS and not the Cheltenham Plan.

Policy EM4, designed to promote a cyber-security sector in Cheltenham, received strong support (93%). Several respondents believe that having a cyber park would give Cheltenham an advantage in attracting high-value jobs in a unique industry.

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

Local Green Space (Question 8)

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

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

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

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



Development Proposals (Question 9 & 10)

Policies PR1 and PR2 propose allocating sites for residential use or mixed use. Many comments on these policies are from developers promoting specific sites.

Question	Yes	No
Do you agree with Proposed Policy PR1 Land Allocated for Housing Development?	30	53
Do you agree with Proposed Policy PR2 Land Allocated for Mixed Use Development?	39	16

Housing allocations proposals were not as popular as other policies in the consultation, with many respondents disagreeing with specific sites.

The Reeve's Field site, which was proposed for housing, received objections based on the current use of the site as a sports field. Several respondents felt that the allocation contradicted paragraph 74 of the NPPF, which states that land used for sports or recreational purposes should only be built on in special circumstances. Other issues raised include: the location of the site in a conservation area, the potential loss of a green space, the availability of the site for development, key views of the escarpment from the field, and traffic problems which might arise from further housing development.

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

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

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

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



Amendments to the Principal Urban Area (Question 11)

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

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

Article 4 Directions (Questions 12, 13 & 14)

Question	Yes	No
Do you think that an Article 4 direction to restrict HMOs is required in any part of the Borough?	26	19
Do you think that an Article 4 direction in any Conservation Area is required to stop the erosion of its special character through householder development in any part of the Borough?	30	16
Do you think that an Article 4 direction to restrict the loss of office or employment uses to residential is required in any part of the Borough?	21	24

An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

The consultation posed three questions to respondents regarding Article 4 directions. Consultees were asked whether HMO restrictions were required, whether development should be restricted in conservation areas, and whether employment uses being lost to residential should be restricted. A house in multiple occupation (HMO) can be defined in simple terms as a shared residential property where a certain number of occupants are not related to each other and they share basic amenities such as kitchen areas and bathroom facilities. The responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from householder development (65%). A slight



majority did not want to restrict the loss of office space to residential uses (53%).

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

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

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

Evidence Base (Question 15)

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

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

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

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

