

The Cheltenham Plan 2011-2031

Statement of Consultation

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Preface

This report sets out how Cheltenham Borough Council (CBC) undertook consultation between 2013 and 2018 to inform the preparation of the Cheltenham Plan. The document summarises how we consulted, who was invited to make representations, the comments that were received and how we have responded to these in preparing the Pre-Submission Plan.

The consultations have been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 22)

(1) (i)-(iii) which state that a Consultation Statement must be produced to show:

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

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

- i. The first consultation was undertaken on the Cheltenham Plan Scoping Report during an 8-week period ending on the 2nd September 2013.
- ii. The second consultation was undertaken on the Cheltenham Plan (Part One) Issues & Options during a 6-week period in June / July 2015.
- iii. The third consultation was undertaken on the Cheltenham Plan (Part One) Preferred Options during an 8-week period in January / February 2017 and was a non-statutory stage of consultation.

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

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

CBC undertook one Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 19) consultation. This was a Pre-Submission consultation which ran for eight weeks between 12th February and 9th April 2018.

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

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

Cheltenham Plan scoping consultation

Introduction

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

Overview

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

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

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

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

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

Objectives were taken from existing plans and presented to respondents to comment on their importance, using a scale of Very Important, Quite Important, No View and Not Very Important. Most objectives were deemed by most respondents to be either very important or quite important. Good design, conserving landscape and the green environment, re-using brownfield land, economic vitality and sustainable transport had the highest number of “very important” responses. Safeguarding existing employment land and provision for the elderly/disabled had the most “quite important” responses. The highest number of “not very important” responses applied to safeguarding existing employment land and preventing the coalescence of Cheltenham with other

settlements – recreation/leisure and tourism also attracted a high instance of responses in this category.

When asked what other objectives could be included, a range of objectives were suggested, such as greater emphasis on cycle and walking provision, as well as improved local shopping provision.

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

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

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

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

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

Cheltenham Plan (Part One): Issues and options consultation

Introduction

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

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

An interactive online map showing local green space, existing employment sites, potential development site options and sites with existing planning permission for residential and/or employment development was made available at cheltenham.gov.uk/maps. Evidence supporting the emerging plan was also available for comment¹; this included the Cheltenham economic strategy paper, the local green space study, the AONB landscape sensitivity study and the integrated appraisal scoping paper.

1,266 people, businesses and organisations (statutory and non-statutory) were contacted via email using the INOVEM consultation system. A further 47 people, businesses and organisations were contacted by letter; these were mostly land owners². 556 people, businesses and organisations (statutory and non-statutory) completed questionnaires.

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

Six weeks prior to the consultation starting the Council advertised the consultation to local stakeholders in line with Gloucestershire compact agreement as set out in the council's Statement of Community Involvement³. A press statement was published on the Council's website a week before the consultation. The Gloucester Echo published an article advertising the consultation on their website on 21st June 2015⁴.

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

Date	Event	Times
18/05/2015	Hesters Way Partnership	18:30

¹ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/local_development_framework-evidence_base

² Including all those identified by the land registry as owners of land being considered at this stage for local green space designation

³ SCI paragraphs 8.1 and 8.2

⁴ <http://www.gloucestershireecho.co.uk/views-future-Cheltenham-borough-council-consults/story-26738441-detail/story.html>

26/05/2015	Neighbourhood Co-ordination Group chairs	17:30
10/06/2015	Pittville Partnership	19:00
04/07/2015	Mid-summer Fiesta, Montpellier Gardens	12:00 to 21:00
13/07/2015	Charlton Kings Parish Council Planning committee	19:30
18/07/2015	Regents Arcade	10:00 to 16:00
23/07/2015	St Pauls Road area association	18:30

Overview

The questionnaire included 43 questions that focused on four key areas: the plan's vision and objectives, the Cheltenham economy and existing employment sites, local green spaces and future development sites.

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

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

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

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

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

Vision & Objectives

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

A further refinement of the objectives was suggested especially where objectives are mutually exclusive (protecting green fields and landscapes vs growth). It is argued by some that this would

help to avoid a stalemate in any future planning balance exercise. A number of respondents raised issues relating to the AONB and highlighted the need to protect it from development as an objective.

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

Cheltenham Economy

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

- A. Safeguarding existing and future employment land (*22 in favour, 11 against; option 3 most preferred*);
 - OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2;
 - OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development;
 - **OPTION 3: Protect the best and evaluate the rest;**
 - Other option;
- B. Promoting one type of industry over another (*13 in favour, 4 against; option 4 most preferred*);
 - **OPTION 4: Introduce selective management of Cheltenham's economy;**
 - OPTION 5: No policy intervention;
 - Other option;
- C. Promoting a Cyber Security cluster (*12 in favour, 3 against; option 6 most preferred*);
 - **OPTION 6: Introduce a cyber-security cluster;**
 - OPTION 7: Do not promote cluster development; and
 - Other Option.

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

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

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

In broad terms respondents recognised land availability is constrained and suggested that industries that can provide added benefit to Cheltenham's economy and the town should be promoted over others. Conversely several respondents felt this was not the role of town planners and the Council to micromanage the local economy, it should be market led with flexible planning policies to support the local economy. Only in exceptional cases should the Council intervene.

Respondents identified the crucial role GCHQ plays in Cheltenham's future economy. A cyber security (high technology) cluster was very well supported. Many supported the actions to grow the cyber security industry in Cheltenham however a few cautioned this should not be at the expense of other industries. Some believed other industries should be the focus of a cluster policy, examples include high tech industries, defence, IT, education, manufacturing, cultural industries and promoting corporate HQs.

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

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

Local Green Space

This chapter identified three policy options, these are:

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

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

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

Several new LGS sites were promoted, these include:

- Ashley Close adjacent to number 16;
- Honeybourne Line;
- Caernarvon Park, Up Hatherley
- Open space between Cirencester Road and Newcourt Road, adjacent to the car wash site;
- Holy Apostles Primary School Fields;
- Glenfall Way School site;
- Reeves Field (A toolkit was submitted in support of this site).

General suggestions were also made and included all school playing fields, the countryside immediately adjacent to the town which is heavily used by the public for informal recreation, orchards and ancient woodlands. The Honeybourne line was suggested by a number of respondents although some respondents felt that a local green space designation might constrain potential sustainable transport projects in the future.

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

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

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

Development Sites

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

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

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

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

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

A good proportion of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many

also referenced the JCS examination and challenged Cheltenham's housing numbers (objectively assessed housing need).

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

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

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

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

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

Integrated Appraisal

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

Cheltenham Plan (Part One): Preferred Options consultation

Introduction

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

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

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

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

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

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

Date	Event	Times
16 th February 2016	Leckhampton Village Hall	15.00 to 19.00
20 th February 2016	Oakley Community Resource Centre	15.00 to 19.00
7 th March 2016	Prestbury Library	15.00 to 19.00
11 th March 2016	Regents Arcade	10.00 to 15.00
14 th March 2016	Hester's Way Community Resource Centre	15.00 to 19.00

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.

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

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

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

Vision & Objectives (Question 1)

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

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

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

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

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

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

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

at this site. The decision to remove this site from the Green Belt is part of the JCS and not the Cheltenham Plan.

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

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

Local Green Space (Question 8)

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

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

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

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

Development Proposals (Question 9 & 10)

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

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

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

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

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

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

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

Amendments to the Principal Urban Area (Question 11)

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

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

Article 4 Directions (Questions 12, 13 & 14)

An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development

anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

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

Cheltenham Plan pre-submission (Regulation 19) consultation

Introduction

Consultation on the pre-submission Cheltenham Plan took place between 12th February and 9th April 2018. Members of the public and stakeholders were given a period of eight weeks in which to make comment.

Comments were invited from all contacts on the Cheltenham Plan database and copies of the Plan were made available electronically via the Council's website and in paper format at the Council's deposit locations.

Efforts were made to ensure the public, local businesses, statutory consultees and other stakeholders were aware of the consultation through media releases, engagement with parish and neighbourhood groups, and via Council networks to alert groups to help cascade information.

The Pre-Submission documents were available online for comment, using the INOVEM consultation system. Prior to the consultation, 3178 people, organisations and groups (statutory and non-statutory) were contacted either by email or letter, and invited to take part in the consultation.

Six weeks prior to the start of the consultation, the Council advertised the consultation to local stakeholders in line with the 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.

Date	Event	Times
5 th March 2018	Hester's Way Community Resource Centre	15.00 to 19.00
7 th March 2018	United Reformed Church Centre, Salisbury Avenue	15.00 to 19.00
12 th March 2018	Oakley Community Resource Centre	14.00 to 18.00
14 th March 2018	Leckhampton Church of England Primary School	18.00 to 21.00
24 th March 2018	Regent Arcade	11.30 to 14.30

604 consultees responded to the consultation with a total of 1392 separate comments. A significant number of the comments related to housing development (475) and green infrastructure (332). The majority of these comments were concerned with a small number of sites including Leckhampton, Oakhurst Rise and the A40 corridor. In other sections there were also a number of comments about the Grovefield Way employment site as well as traffic and air quality in general.

Section	Number of comments
Introduction	30
Vision and objectives	15
Employment	139
Retail	10
Design Requirements	15

Green Belt	8
Landscape	12
The Cotswolds AONB	6
Historic Environment	13
Biodiversity and Geodiversity	9
Residential Development	475
Housing mix and standards	127
Gypsies, Travellers and Travelling Showpeople	6
Health and Environmental Quality	134
Transport Network	31
Green Infrastructure	332
Social and Community Infrastructure	16
Renewable Energy and Low Carbon Energy Development	4
Delivery, Monitoring and Review	8
Policies Superseded by the JCS and Cheltenham Plan	2
Total	1392

Vision and objectives

Only a small number of comments were received in this section. This is likely a reflection of the number of times the vision and objectives have been consulted upon. Previous suggestions for amendments have been taken into account.

Employment

Some respondents raised concerns that other employment uses were not considered in the chapter including:

- Retail
- Tourism
- Light industry
- Public relations
- Creative arts

Further details were sought about how the council will support business start-ups and promote sustainable transport to new employment sites.

Objections were raised to new employment allocations being solely B-class allocations and not being restrictive enough. Points of clarity were also sought.

Retail

Only a small number of comments were received, due to this subject mainly being dealt with through the Joint Core Strategy Retail Review. There were some concerns regarding the future of the high street and the lack of an adequate strategy/policies to direct future changes.

Design Requirements

Some respondents suggested specific amendments to design policies to reinforce certain principles of design. The Council does not feel that the level of detail suggested is necessary and considers that each development proposal should be looked at on its own merits.

Green Belt

A small number of comments related specifically to Green Belt policy. This is a reflection of the fact that the Cheltenham Plan does not propose any alterations to Green Belt boundaries.

Landscape

A relatively small number of comments were received regarding landscape policies. A concern which has also arisen in previous consultations is the '*Landscape Character, Sensitivity and Capacity Assessment of Cotswolds AONB within the Cheltenham Borough Administrative Area*' report being used as part of the evidence base. The report has been the subject of close scrutiny since its publication. The Council considers this piece of work to be an important part of the Cheltenham Plan evidence base. It is not part of policy itself and weight will be given to its content accordingly.

The Cotswolds AONB

The Cheltenham Plan does not contain any AONB-specific policies as this has been covered by the JCS. Consequently only a small number of comments were received related to this topic.

Historic Environment

A small number of comments were received regarding the historic environment. Most of these were specific suggestions for alterations to conservation area boundaries.

Biodiversity and Geodiversity

Natural England raised concerns about potential impacts on the Beechwoods Special Area of Conservation (SAC). Impacts on the SAC are a strategic issue which affect several local authorities. The JCS authorities will be working with Stroud District Council on their HRA and this will likely include surveys of the Beechwoods SAC. It is also worth mentioning that the impact of the recent Court of Justice of the European Union (CJEU) judgment on the Habitats Directive has been taken into account and the accompanying Habitats Regulations Assessment has been updated.

Residential Development

Objections were raised to the proposed residential allocations with a particular focus on the Leckhampton and Land off Oakhurst Rise sites.

Objections to Leckhampton site allocation included:

- The allocation of 250 houses exceeds the recommendation by the JCS Inspector of around 200 houses;
- The proposed location of the school playing fields within the proposed Local Green Space;
- Air pollution;

- Increased traffic on already congested roads;
- More air quality measurements and monitoring are needed as part of the masterplanning;
- Flooding on-site and downstream;
- Impact on wildlife;
- Make sure that areas HB, R2 and R3 are never developed;
- The school should have been part of the JCS.

Objections to Land off Oakhurst Rise site allocation included:

- Overdevelopment/density;
- Inadequate access /increase in traffic/safety of pedestrians and cyclists;
- Loss of existing green space/cross-country running facility;
- Impact on local community;
- Impact on wide variety of wildlife/protected species;
- Impact on local infrastructure – schools and GP surgeries already oversubscribed;
- Flooding and drainage/increase in surface water run-off;
- Adverse visual impact on AONB/reduction in landscape quality;
- Removal of trees and hedgerows;
- Noise and pollution during and after construction;
- Increased air pollution;
- Impact on setting of nearby Grade II and Grade II* listed buildings;
- Lack of affordable housing;
- Overlooking/loss of privacy to neighbouring properties;
- Proximity to St. Edward's Preparatory School;
- Contrary to Charlton Kings Parish Plan.

All of the site allocations are justified by a substantial body of evidence which has explored reasonable alternatives across the borough. Sustainability Appraisal confirms that the sites are sustainable options and the SALA confirms that they are deliverable.

A number of alternative development sites were proposed, including:

- Land at Kidnappers Lane
- Shaw Green Lane
- Glenfall Way
- Reeve's Field
- Prestbury Road
- Land at Morris Hill
- The Hayloft
- Tim Fry Landrovers
- Cromwell Court
- Land to the north of Lake Street

The Council was already aware of the majority of these sites. They have been discounted for several reasons. The promoters of alternative sites also commented that the housing supply figure should be increased because of past under-delivery. However, the housing requirement and housing supply

figures for Cheltenham are set out in the JCS. Any changes to those figures will come through a review of the JCS. The JCS housing requirement figures include uplift for economic growth, affordable housing and a 20% buffer.

Housing mix and standards

This section received relatively few responses and support for the control of Houses in Multiple Occupation. A number of comments raised objections to two minor changes to the Principal Urban Area. These changes to the PUA represent minor alterations which are considered to merely reflect the existing urban character of those areas.

Gypsies, Travellers and Travelling Showpeople

A small number of respondents questioned whether the Mill Lane allocation is the best location for a permanent Gypsy site. The reasoning for this decision is set out in the Plan and the Council consider it to be robust and rational.

Health and Environmental Quality

A larger number of responses to the consultation mentioned concerns about air quality and the need to improve this across the borough. Air quality within Cheltenham is closely monitored because of the recognised issues. The JCS Policy SD14 requires new development to result in no unacceptable levels of air pollution and to expose no unacceptable risk to existing sources of pollution.

The Council is also required to produce air quality reports and action plans if necessary.

There was also a significant number of comments which mentioned the issue of flooding. These related to some specific sites but also to overall flood risk management. Numerous pieces of flooding evidence have been produced in the past several years for the majority of allocation sites. Clearly, flooding remains an issue in Cheltenham despite significant infrastructure improvements. However, the evidence demonstrates that the proposals in the plan will not have a significant impact on flooding. Detailed flood modelling and mitigation will be required as part of planning applications.

Transport Network

Numerous comments were received relating to transport issues which lie outside the purview of the Cheltenham Plan; for example, parking charges and town centre paving.

There were some concerns regarding the level of congestion on the road network as it is and how allocated sites could make this worse. The JCS and Cheltenham Plan transport evidence has demonstrated that there are ways in which the level of proposed development can be accommodated on the network. More specific mitigation cannot be identified until more detailed schemes have been proposed.

Green Infrastructure

This section received a large number of responses, many of which were supportive of the Local Green Space (LGS) designation at Leckhampton, although there were some comments about the

need to include additional land. There were also some comments suggesting that the Leckhampton LGS was too large and that certain parts should be removed.

A number of other sites, notably Oakhurst Rise and the A40 Corridor, received a large number of comments requesting that they be included in the plan as LGS.

Social and Community Infrastructure

A relatively small number of comments were received on this topic, and mostly related to issues around lack of existing infrastructure, such as GP surgeries. Improving existing infrastructure is an issue which goes beyond the limits of a local plan. There are, however, policies which seek to mitigate any impacts of new development.

Renewable Energy and Low Carbon Energy Development

A small number of comments suggested that this chapter fails to address multiple sources of low-carbon energy that could be developed in Cheltenham. JCS Policy INF5 supports the development of renewable energy or low carbon energy schemes.

Delivery, Monitoring and Review

The majority of relevant responses to this section focus on monitoring indicators.

APPENDIX 1 - Local Plan consultation

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

- Planning and Liaison Member Working Group (PLMWG) – a cross party group with a remit to consider and advise on the emerging Cheltenham Plan and provide guidance and feedback to Planning Committee, Cabinet and Council as appropriate. Through regular meetings, the Working Group has had a number of opportunities to comment and shape working drafts of the document. Meetings have also been held with other elected members (not part of PLMWG) and each of the political groups that requested an individual update.
- Internal officer working group - comprising officers from across the Council with a remit to consider, advise and inform the emerging Cheltenham Plan, requesting information from and providing feedback to individual teams as appropriate. This group has had the opportunity to feed into the draft scope, visioning and objectives consultation and has been kept informed on subsequent progress with the plan.
- Liaison with the Strategy and Engagement team to ensure that the Cheltenham Plan aligns with the Corporate Strategy and that consultation responses are elicited as widely as possible across the Borough.
- The Cheltenham Development Task Force – regular updates and discussions have taken place between the Taskforce and officers leading the preparation of the Cheltenham Plan.
- Cheltenham's parishes and communities have been kept up to date on latest developments with the Plan through updates to the regular 'C5' and meetings of the Neighbourhood and Community Group Chairs.
- Feedback from the Cheltenham Plan Scoping consultation (July –September 2013).
- Feedback from the Issues and Options Consultation (June – August 2016).
- Feedback from the Preferred Options Consultation (January - February 2017). Approximately 600 comments have been uploaded to the Council website and are summarised by way of a Consultation Report which is also available to view on the website.
- Comments made to Pre-Submission Consultation (February – April 2018).

APPENDIX 2 - Consultee database

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

i. Specific consultation bodies

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

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

For Cheltenham Borough this includes the following:

- Badgeworth Parish Council
- Bishops Cleeve Parish Council
- Boddington Parish Council
- Bredon Parish Council
- Brockworth Parish Council
- Charlton Kings Parish Council
- Coberley Parish Council
- Cotswold District Council
- Dowdeswell Parish Council
- Relevant electricity and gas companies
- English Heritage
- The Environment Agency
- Forest of Dean District Council
- Gloucestershire Clinical Commissioning Group (replaces Primary Care Trust)
- Gloucestershire Constabulary

- Gloucestershire County Council
- Highways Agency
- The Historic Buildings and Monuments Commission for England
- Homes and Communities Agency
- Innsworth Parish Council
- Leckhampton with Warden Hill Parish Council
- Longford Parish Council
- Natural England
- Network Rail
- Prestbury Parish Council
- Severn Trent Water
- Sevenhampton Parish Council
- Shurdington Parish Council
- Southam Parish Council
- Staverton Parish Council
- Stoke Orchard Parish Council
- Stroud District Council
- Swindon Parish Council
- Relevant telecommunications companies
- Tewkesbury Borough Council
- Uckington Parish Council
- Up Hatherley Parish Council
- Whittington Parish Council
- Wiltshire County Council

ii. General consultation bodies

The Regulations define general consultation bodies as:

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

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

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

- Land owners
- Property developers
- Property agents and planning consultancies

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

APPENDIX 3 - Comments on Issues and Options

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

Some respondents argued the importance of preventing small light-industrial units from changing use to housing	The Council is mindful of the fact that there have been historic changes of use away from employment uses, principally to housing. The policy framework of the emerging plan adopts a dual-pronged approach to help prevent this trend from continuing in future.
Local Green Space	
Option 9 was the preferred choice for the majority of respondents	Maintaining existing 'Public Green Space' and only allocating 'Local Green Space' that meets the framework's criteria (Option 9) was taken forward as the favoured approach for addressing Local Green Space
The vast majority of comments relating to the LGS sites advanced in the plan were in support although levels of support varied considerably from site to site. Several new sites were also suggested	Noted. Newly suggested sites have been incorporated into the plan where they meet the criteria for the designation of LGS
Several land owners were concerned that Local Green Space should not be used to undermine the aims of identifying sufficient land at suitable locations to meet identified development needs	The Council acknowledges that Public Green Space and Local Green Space are extremely important to the local community and the number of LGS designations included in the emerging plan reflects this stance. The designation of LGS has not compromised the ability of the plan to make sufficient allocations for residential, employment and mixed-use development as all identified needs are being met either in the JCS or the Cheltenham Plan itself
Development Sites	
Whilst JCS urban extensions sites did not feature in this consultation, many respondents used this as an opportunity to object to these allocations	Inappropriate comments have been discarded as necessary
Some respondents recognised greenfield sites adjoining the Principal Urban Area (PUA) may be required to meet the challenging housing requirement, although this should only occur once all brownfield sites have been developed	The plan has attempted to strike a balance between brownfield allocations and greenfield allocations adjoining the PUA. However, it should be noted that most greenfield allocations are either embodied within or result from the strategy of the JCS.
There was a high level of objection to the suggested allocation of the site at Glenfall Way	The site was not taken forward in the Plan
Most respondents were not in favour of development at Priors Farm and stressed the need to protect the land for the benefit of the local community	This site was taken forward to the next stage as a low density, mixed-use development option which required careful master-planning to reconcile several competing demands
Most respondents supported housing and mixed-use development on North Place and Portland Street subject to integration with the townscape in this part of Cheltenham	Noted. This site was taken forward to the next stage of plan preparation having regard to community feedback and the fact that the site benefited from extant planning consent
Several new sites and development locations	New sites were examined according to the

<p>were promoted and suggested during the consultation</p>	<p>availability, suitability and achievability of development over the plan period. Where appropriate, they were advanced to the next stage of plan preparation (e.g. the former Premiere Products site at Bouncers Lane)</p>
<p>More general suggestions referred to the need to integrate housing into town centre developments and focus on brownfield sites that are unoccupied or derelict</p>	<p>The comments are noted and have formed one of the guiding principles in the preparation of the plan with allocations being made in accord with those priorities wherever possible</p>

APPENDIX 4 - Comments on Preferred Options

Topic / Issue	Council response
Vision & Objectives	
The vision and objectives were largely supported at this stage although some consultees continued to request that the AONB be referenced specifically in this section.	A specific objective on protecting the AONB has been resisted as this is a requirement of the NPPF and is reflected in the policy content of the JCS and the Cheltenham Plan.
The Economy	
91% of respondents supported the overall Preferred Strategy for the economy.	Noted and welcomed.
Policy EM1, which proposes to safeguard key existing employment land, was very popular with respondents, achieving a 92% approval rating.	Noted and welcomed.
Some critics of the policy stated that not enough key sites were designated, whilst others stated that applications on existing employment sites should be judged on their individual merits rather than on a blanket designation.	The methodology for identifying key sites focusses on particular criteria as set out in the Preferred Options. The identification of sites is accompanied by a criteria-based policy that facilitates the assessment of development proposals for changes of use away from employment.
The proposal to safeguard non-designated existing employment land (Policy EM2) was just as popular, receiving approval from 91% of respondents.	Noted and welcomed.
Some respondents made a request for the plan to provide housing where employment uses have failed or are underused.	Policies EM1 and EM2 allow the assessment of proposals with changes of use from employment being allowed in certain circumstances subject to the applicant providing sufficient evidence to help justify that change.
Whilst still popular amongst respondents (75% approval rating), several comments raised concern over the Grovefield Way employment allocation (Policy EM3) with consultees stating that no further incursions into the Green Belt should occur.	The history of Grovefield Way is a long and complex one. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy will remove the Green Belt designation here and, as part of the site already benefits from extant planning consent for B1 uses, its allocation for much needed employment use is logical and in accord with the broader strategy of the Cheltenham Plan.
Policy EM4, designed to promote a cyber-security sector in Cheltenham, received strong support (93% approval rating). Several respondents believe that having a cyber park	Noted and welcomed.

would give Cheltenham an advantage in attracting high-value jobs in a unique industry.	
The protection of the former Honeybourne Railway Line via Policy EM5 line also proved to be a popular proposal, with 93% of consultees supporting it. However, many comments from both supporters and objectors requested that the cycle route be extended, both into the town centre and in northerly and southerly directions.	Noted and welcomed. Connecting spurs/routes will be added to the Cheltenham Plan Proposals Map where there is sufficient evidence to justify their inclusion as protected routes.
Local Green Space	
88% of respondents supported the more ambitious option to designate 14 areas of Local Green Space including 6 areas already designated as Public Green Space (Policy GE8A)	Noted and welcomed. The Cheltenham Plan is also taking forward existing Public Green Space designations (a forerunner of LGS that was brought forward in the adopted 2006 Borough Local Plan) as Local Green Space. This is to avoid creating a two-tier system of protection that could have caused confusion.
A Parish Council proposal for LGS at Leckhampton received significant support with 192 representations being submitted in total.	The Parish Council's suggestion has been taken on board and features as an integral part of the Cheltenham Plan's proposals for Leckhampton.
Other LGS suggestions were received in respect of land at Reeve's Field; the highway verge along the A40 at Benhall; land off Oakhurst Rise; and a verge at Harrington Drive.	The Harrington Drive LGS proposal has been taken forward in the Plan. The remaining LGS proposals either conflict with development proposals in the Plan or are inappropriate for designation and have been omitted.
Development Proposals	
Policies PR1 and PR2 proposing housing and mixed use allocations were not as popular as other policies in this consultation with many respondents disagreeing with the allocation of specific sites. Particular attention focussed on Reeve's Field and Prior's Farm both of which have current uses as sports/playing fields.	Both Reeve's Field and Prior's Farm Fields continue to feature in the Cheltenham Plan as part of the wider strategy for sustainable development. Both allocations recognise the importance of master-planning as an important means of reconciling any competing demands/interests across the wider area and both allocations propose the retention of large areas of green space.
An indicative proposal for housing and Local Green Space at Leckhampton received general acceptance provided that the number of new homes provided was not too high.	Noted. The number of new homes being accommodated at Leckhampton reflects discussions that took place as part of the JCS process and the fact that Leckhampton was cascaded from that process as a non-strategic site.
Planning agents focused on the need to boost the supply of housing in Cheltenham and advanced strategic and site-specific evidence on behalf of their respective clients.	The sites put forward through the JCS and Cheltenham Plan combine to meet the Borough's Objectively Assessed Housing Need up to 2031. Some Cheltenham Plan allocations reflect submissions to the Council as part of the SALA process and/or the Cheltenham Plan call for sites, where inclusion of those sites would assist in the establishment of a strategy for

	sustainable development.
Amendments to the Principal Urban Area (PUA)	
62% of respondents supported the proposed amendments.	Noted. The vast majority of PUA amendments reflect development that has already been undertaken following the granting of planning permission.
Most of the objections related to a single property in The Reddings.	The property concerned is long-established and amendment to the boundary at this location corrects a historic omission from the PUA.
Article 4 Directions	
Some respondents consider that the St. Paul's area should have an HMO restriction as there are too many HMOs occupied by students and more housing should be available for families.	The Cheltenham Plan has introduced a policy on Houses in Multiple Occupation which facilitates the assessment of planning proposals for HMOs in St. Paul's ward according to a number of clearly defined criteria.
The number of HMOs in the town centre area is considered damaging to the infrastructure and character of Cheltenham by some.	See above. St. Paul's is one of the wards that comprise the town centre.
Overall, responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from householder development (65%).	The Council has introduced Policy HM5 to the Cheltenham Plan to help address the high proliferation of HMOs in St. Paul's. The Council will consider introducing Article 4 directions in Conservation Areas subject to the findings of the relevant conservation area reviews/re-appraisals and the recommendations included in any resulting Conservation Area Management Plans.

APPENDIX 5 - Comments on Pre-Submission

Introduction

Issue	Council response
Writing style of the whole document is unclear and difficult to understand.	Communicating technical planning concepts in an accessible way can be difficult. Great care was taken in the drafting of the extensive suite of documents related to the Cheltenham Plan. Any minor spelling or grammar errors will be corrected before the Plan is adopted.
Given the ongoing delays in dwelling completions and the difficulties identified in delivering the identified housing allocations, the Cheltenham Plan has failed the Duty to Cooperate requirement in that unmet needs are not identified as being met by Tewkesbury Borough.	Overall housing requirement figures for Cheltenham Borough have been agreed through the Joint Core Strategy. This was prepared alongside Tewkesbury Borough and Gloucester City Councils, as will any review of the JCS. The Cheltenham Plan's role is to fulfil the local requirements set out in the JCS.

Vision and objectives

Issue	Council response
Vision and objectives are still far too focussed on economic prosperity. There is insufficient focus on the protection of the environment, biodiversity and above all agriculture.	The vision and objectives have been shaped by several rounds of consultation and include references to all three pillars of sustainability.
There should be a stronger emphasis on promoting local jobs and skills within new development.	The vision and objectives have been shaped by several rounds of consultation and include references to all three pillars of sustainability.
An objective relating to improving connectivity of existing transport network should be included.	Connectivity and integration of new developments are part of the objectives.

Employment

Issue	Council response
Start-ups - there seems to be a lack of detail on how and where such businesses can be encouraged in Cheltenham.	Alongside the Cheltenham Plan, an Economic Action Plan is being prepared. This will provide further detailed actions that the Council will take to encourage economic development in the Borough, including detail on start-ups and SMEs.
Tourism - consideration should be given to Cheltenham's location, not just close to the Cotswolds but to the tourist attractions in the	Alongside the Cheltenham Plan, a tourism strategy is being produced by Marketing Cheltenham which will consider tourism in more

rest of Gloucestershire.	depth and detail.
The Draft Local Plan still lists the application for hybrid business use of site E3 (Grovefield Way), even though permission was refused on 14th December 2017.	The application is still an important part of the planning history. Furthermore the application is still in the process of being decided as an appeal has been launched (and a further application submitted 18/01004/FUL)
<p>Objections to development at Grovefield Way (E3) on grounds of:</p> <ul style="list-style-type: none"> • Traffic • Air Quality • Flooding • Only B use class should be allowed • Retail on the site will be harmful • Loss of countryside • Loss of Green Belt 	The evidence supporting the Cheltenham Plan does not raise any severe concerns that cannot be overcome through the application process. The site has been proposed for allocation for employment uses or sui generis use which has characteristics of employment uses only. Cheltenham is highly constrained, and it is therefore necessary to look to greenfield land on the outskirts of the town. The site is not in the Green Belt, having been removed through the JCS.
The employment site E2 at Hatherley Lane should be restricted to purely B-class use.	As explained in the Economy Background Paper, the degree of flexibility built into Policy EM3 is in response to the changing needs of the market, whilst still encouraging land uses that provide jobs.
The form and layout of employment sites should not preclude walk and cycle movement through and to them in the way that old employment allocations have done.	The NPPF and JCS require all development to be sustainable. This includes appropriate protection/provision of sustainable transport modes both in and through the site. This will be considered in further detail through the applications process for each site.
Policy EM3 would benefit from the following additional clause for defining potentially acceptable exceptional changes of use of employment land: <i>'The proposed use will not prejudice the efficient operations of existing safeguarded minerals and/or waste management infrastructure'</i> .	Noted, suggested change will be considered, although the Minerals and Waste management plan makes up part of the overall development, and should be considered as part of the applications process where appropriate.
The policies react to and reflect current events and development opportunities, rather than establish a clear and long-term strategic vision for Cheltenham.	There is a requirement to review the Cheltenham Plan every five years, in recognition that it is difficult to plan for the long term in an ever-changing environment.
The Plan does not provide sufficient employment land to support the Borough's needs within the Plan Period.	The Cheltenham Plan is in line with the JCS regarding employment land site allocations. It should be noted that the JCS strategic allocations also provide employment land supply; a total of 112.2ha will be provided. Some of this land will go towards meeting Cheltenham's need, as well as the employment allocations in the Cheltenham Plan. The allocations proposed in the Cheltenham Plan are intended to provide further choice and flexibility for the market. The strategic allocations adjoining Cheltenham are expected to provide a total of 68.4ha of

	employment land for the JCS area.
Disagree with the allocation of the Hatherley Lane (E2) in proposed Policy EM3 due to the suitability of the site for residential allocation, and the lack of suitability for employment.	The Plan explains the reasons for this allocation, with further explanation provided in the Economy Background Paper. The site aligns with the employment strategy taken in the Plan and surrounding land uses include non-residential uses, with good connectivity to the strategic highway network. Furthermore, permission was previously granted for office use as part of a larger site, demonstrating that in principle the site is suitable for employment uses.
Chelt Walk (Site E4) is appropriate for mixed use regeneration combining employment and residential.	A small element of residential may be considered acceptable on this site, subject to design, due to constraints such as the site's location within Flood Zones 2 and 3, as explained in both the Cheltenham Plan and the Economy Background Paper.
Large new employment sites should be preceded by robust and detailed design briefs to ensure that the shape and form of the development is appropriate to its immediate setting and surrounding environment.	The majority of the sites proposed for allocation in the Cheltenham Plan are below 1ha in size. These issues would ordinarily be dealt with through the planning application process having regard to the relevant policies on design and green infrastructure in development plans.
The provisions of Policy EM2: Safeguarding Non-Designated Existing Employment Land and Buildings are, in part, unclear but are also unduly onerous - placing unreasonable and unjustified hurdles before landowners, developers and stakeholders in pursuing development proposals on employment sites which are not defined in the Local Plan as 'key' employment sites.	A similar policy has previously been included in the adopted Local Plan (2006), and has been successfully defended through S.78 appeals. The borough needs to maintain quality employment land for that use (or appropriate related uses). If the site for whatever reason is no longer appropriate as an employment site then the tests as given in the policy will be met and providing the application satisfies all other relevant policies, permission will be granted.
It would be sensible for Policy EM2 to state that job-generating uses are acceptable in principle and considered on their merits	The wording of this policy has been carefully considered so as to maintain good-quality and well-utilised employment land for that use, but also to allow land that would be more suited to other uses to be developed as appropriate.
Policy EM2 as drafted does not reflect the direction and spirit of national planning policy. To require an applicant to consider alternative uses through viability assessment based upon the sequence presented does not constitute a sensible approach to planning.	Policy EM2 is aligned with the employment strategy of the plan, the main aim of which is to safeguard employment land most suited to that use. The use of a sequential approach to alternative land uses aims to maintain an element of employment if the site can support this.
The requirement to submit an Employment Skills Plan (EM4) could potentially dissuade some applicants.	Policy EM4 only applies to major indoor developments and aims to aid with social and environmental sustainability. It also aligns with the Council's emerging Economic Development Action Plan and the Strategic Economic Plan for Gloucestershire. Furthermore, this policy will be

	considered through Plan Review as appropriate to ensure that it does not stifle potential economic development in the Borough.
There appears little if any strategy to enhance the other industries in our town, including retail, light industry, advertising, public relations and the creative arts.	The employment strategy focuses purely on the B-class uses (office, industrial, and storage) and others that exhibit characteristics of traditional employment uses. Retail and other town centre uses will be dealt with in full through the JCS retail review.
Policy EM3 would benefit from greater clarity as to what is meant by ' <i>Sui Generis uses that exhibit the characteristics of traditional B class employment</i> '.	Noted; further clarification will be considered, without being overly restrictive.
Ensure that non-B1 uses are supported by Policy EM3, under circumstances where these non-B1 uses complement and ensure the delivery/viability of the employment use.	This would need to be considered on a site-by-site basis, so would be better dealt with through the applications process.
Site E2 – a scheme for residential development is considered to be an appropriate use for the site and will provide a better neighbour for existing (and emerging) surrounding residential uses.	The Plan explains the reasons for this allocation, with further explanation provided in the Economy Background Paper. The site aligns with the employment strategy taken in the Plan and surrounding land uses include non-residential uses, with good connectivity to the strategic highway network. Furthermore, permission was previously granted for office use as part of a larger site, demonstrating that in principle the site is suitable for employment uses.
Alternative wording is required to promote a flexible, mixed-use allocation including residential for Royal Well and Municipal Office.	The policy allows for a mixed-use scheme.
Concern is raised regarding the omission of any reference to residential development for Coronation Square in Table 4.	The policy allows for a mixed-use scheme.

Retail

Issue	Council response
The task now is to manage the decline in retail sales in our High Streets and if possible to find alternative use for the buildings.	Agreed; this is a task that will be considered through the JCS retail review and carried through to policies in line with the NPPF.
The proposed plan is inadequate as it falls short of addressing any of the very real issues and concerns currently affecting Cheltenham's retail future.	Through the JCS examination, the Inspector found that retail should be addressed at a strategic level; therefore, the issues affecting Cheltenham's retail future will be addressed through a review of the JCS already underway.
It is currently difficult to control further out-of-town developments that are detrimental to the town centre due to the absence of a clear policy and up-to-date retail needs analysis.	New evidence to support the JCS retail review will provide the up-to-date retail needs analysis and both strategic and localised policy required. This will aid in resisting inappropriate

	development.
The Cheltenham Plan is not sound as there is no retail policy.	Through the JCS examination, the Inspector found that retail should be addressed at a strategic level; therefore, the issues affecting Cheltenham's retail future will be addressed through a review of the JCS already underway.

Design Requirements

Issue	Council response
Make it clear that the design standards for extensions apply to commercial buildings.	Policy D1 applies to all development.
The concept that all extensions should be subservient to the existing building should be reconsidered/reworded. They should be to a high standard of design, but the materials should take consideration of the original building context rather than necessarily match. The pastiche copying of similar forms of roofs, doors, windows and other elements should be discouraged in favour of good design.	Policies in the Cheltenham Plan and JCS take a flexible approach to design. They require high-quality schemes which complement the area and reflect local context.
The plan should include a building code, such as those in place in historic cities in other countries (e.g. Siena, Italy). This could stipulate a range of proportions and architectural features in keeping with the town's existing Regency architecture, giving developers a flexible palette of building styles drawn not only from Cheltenham's different neighbourhoods but also from other Regency towns.	Policies in the Cheltenham Plan and JCS take a flexible approach to design. They require high quality schemes which complement the area and reflect local context. Conservation Areas also have management plans which highlight the particular historic features prominent in that area.
Policy D1: Design would benefit from an additional clause to the first part to reflect the equal importance of ensuring the principles of sustainability are taken into account.	The principles of sustainable development are clearly set out in the NPPF and should not be reproduced in local plans.
Design policies should set minimum density standards for city/town centres and those well served by public transport.	The NPPF and JCS require new development to demonstrate efficient use of land. However, specific minimum densities are not considered appropriate because of their lack of flexibility.
Add a paragraph after point d) within Policy D1: <i>'Where it would achieve wider urban design benefits in accordance with the key principles of urban design and architectural design set out in Tables SD4b and SD4e of the Joint Core Strategy (JCS), some erosion of open space around existing buildings may be permitted.'</i>	This level of detail is too specific to be part of a robust and legible policy. This type of consideration will happen under the policies as written.
Add paragraph as follows, after point d) of Policy D3: <i>'Where proposed, the loss of a private green space will need to be weighed against the wider</i>	This level of detail is too specific to be part of a robust and legible policy. This type of consideration will happen under the policies as written.

<i>urban design and other benefits delivered by the proposal, considering other policies within this plan and the Joint Core Strategy (JCS).'</i>	
Further emphasis should be placed on the requirement for a design review for all major and strategic developments by the multidisciplinary Gloucestershire Design Review Panel.	The use of design review panels is mentioned in the JCS design section and in the supporting text for Cheltenham Plan Policy D1.

Green Belt

Issue	Council response
Park Lane should be added to the list of streets in Policy GB1 since both sides of this street are in Green Belt. It could also be noted in the supporting text that Spring Lane, Lake Street and Mill Street are also affected by Green Belt, albeit on a single side.	Policy GB1 contains references to specific locations where infilling development in the Green Belt has occurred historically. There is no evidence to include any additional streets.
Policy GB2 states in accordance with the NPPF that replacement dwellings in the Green Belt should not be materially larger. Para 6.11 states that replacement dwellings should be of a similar size to the original. This is supported but additional text or a footnote to the policy should be amplified to emphasise that the replacement should be no bigger in footprint, no higher in height and obviously directly reflects its setting.	This level of detail is not considered to be in accordance with principles of good design because it is over-prescriptive.
Policy GB1 is very much open to personal interpretation.	It is considered that Policy GB1 accords with national policy for the Green Belt.
Policy GB2 - section (b) of this policy is weak and subject to misinterpretation.	It is important to not be overly prescriptive with regards to good design. The JCS and Cheltenham Plan include strong design principles and protections for Green Belt but planning applications should be decided on their own merits.
The Plan should consider specific exceptions and circumstances to allow for sites within the Green Belt to be brought forward.	National and local policy allows for exceptional circumstances to override Green Belt protection. Case law demonstrates that the circumstances of each case must be decided on their own merits so it is not possible to provide a specific list.

Landscape

Issue	Council response
Text should be amended to say Cheltenham is fringed by the Cotswold escarpment on both the eastern and southern sides	The current mention of the escarpment (paragraph 7.1) is within the supporting text. This is intended to give a very brief introduction to the local context.

Leckhampton Fields, marked R2 and R3 on some maps, were excluded from development in the JCS because they were an important part of a valuable landscape.	The Leckhampton allocation and LGS do not form part of the JCS. It was removed from the JCS process and recommended to be part of the Cheltenham Plan. The JCS Inspector mentioned the site in her Interim Findings and made some indicative recommendations regarding the area which should be developed and how many dwellings this may represent. Discussions which took place during the JCS have contributed to the current Cheltenham Plan allocation but the site has also been looked at afresh.
It needs to be made explicitly clear that the policies set out in Section 7 are supplementary to those of the JCS.	The Introduction chapter makes it clear how the JCS and Cheltenham Plan fit together. JCS policies should not be restated in local plans.
Policy L2 might be seen as over-restrictive, in that few redundant agricultural buildings are likely to be structurally sound, and fewer still would not require substantial alteration, extension or rebuilding.	This clause is necessary to prevent unsuitable buildings from being converted to dwellings.
There is a need to provide discreet, off-highway parking in support of access to our extensive rights of way network.	Access to public rights of way is an important part of place-making and promoting healthy lifestyles. There is no evidence that allocation of new car parking facilities is required. Planning applications for such facilities will be determined on their own merits.
Objections to the use of the ' <i>Landscape Character, Sensitivity and Capacity Assessment of Cotswolds AONB within the Cheltenham Borough Administrative Area</i> ' report being used as part of the evidence base.	The <i>Landscape Character, Sensitivity and Capacity Assessment of Cotswolds AONB within the Cheltenham Borough Administrative Area</i> (May 2015) and 2016 update have been the subject of close scrutiny since their publication. The Council considers this piece of work to be an important part of the Cheltenham Plan evidence base.
Policy L1 as worded does not differentiate between different designations, nor does it consider that there are different levels of harm.	Separate policies will be relevant, depending on the location of proposed development.

The Cotswolds AONB

Issue	Council response
AONB tree protection orders must be verified for validity and soundness to enable enforcement.	Existing Tree Protection Orders are the responsibility of the Borough Tree Officer rather than the Cheltenham Plan.
During the Cheltenham Plan period, the Council should be guided by the most up-to-date adopted iteration of the Cotswolds AONB Management Plan rather than the 2013 plan as stated.	Noted – this point is considered a minor alteration to the plan text and will be updated in due course.
JCS Policy SD7 should be restated here as a Local	JCS policies should not be restated in local plans.

Plan Policy.	
To make the plan sound, it should also address development which will potentially have an adverse effect on the AONB.	JCS Policy SD7 refers to potential impact of development on the AONB and its setting.

Historic Environment

Issue	Council response
There is no specific reference that highlights the importance of Registered Parks and Gardens either in terms of safeguarding or ongoing management.	Registered Parks and Gardens are mentioned in the supporting text of JCS Policy SD8.
Ledmore Road estate does not have the same historic value that it once had.	It is inevitable that historic value will decrease over time; however, this area is still considered to be of significant value.
Include Gladstone Road, and 33 and 35 Brookway Road in St. Mary's Conservation Area.	All Conservation Areas have been assessed and inclusions and exclusions have been considered.
Include the London Inn public house, dwellings 274 and 276 London Road, whole of Langton Grove Road and The Langton public house in the Cudnall Street Conservation Area. Remove 282 London Road.	All Conservation Areas have been assessed and inclusions and exclusions have been considered.
There should be a new policy HE4 which specifies and defines all of the conservation area changes and additions.	The Conservation Areas are defined on the Proposals Map and all changes are set out within individual Conservation Area Appraisals. It would not be appropriate to include a policy which defines these changes, especially as Conservation Area boundaries can be altered outside of the local plan process.
New boundaries should be set to both the extended Prestbury Conservation Area and the proposed new Park Lane Conservation Area. Open land which is an integral part of the character of both Conservation Areas should be added.	All Conservation Areas have been assessed and inclusions and exclusions have been considered.
Policy HE1 does not accord with the policy tests set out in the Framework in relation to non-designated heritage assets and therefore should not be found sound in its current form.	It is considered that Policy HE1 conforms to the NPPF (original NPPF), particularly paragraph 135.
The field at the end of Park Lane should be included in the Conservation Area to protect the setting of Park Lane.	All Conservation Areas have been assessed and inclusions and exclusions have been considered.
This Local Plan provides an opportunity to set out guidelines as to when demolition would not be supported by CBC officers and quantify when harm would be caused.	The assessment of harm to a heritage asset depends on the facts of each individual case. It would be unhelpful to include prescriptive definitions in a local plan.
The inner 'Cheltenham Conservation Area' needs to remain as a single entity.	The separation of the Central Conservation Area is in line with Historic England guidance and best practice from around the country.

Biodiversity and Geodiversity

Issue	Council response
It is necessary for the Habitat Regulations Assessment (HRA) to objectively prove that the Cheltenham Plan, when considered alone and also when considered in combination with other plans and projects (such as the JCS or the South Worcestershire Development Plan), will not have a Likely Significant Effect on any EU site. In the case of atmospheric nitrogen deposition for habitats such as Cotswold Beechwoods SAC, a significant effect would be an increase in pollution of 1% or more of the critical load.	<p>Noted - also, the Court of Justice of the European Union (CJEU) judgment has ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage.</p> <p>The HRA has been revised accordingly.</p> <p>It should also be noted that the JCS authorities will be working with Stroud District Council on its HRA and this will likely include surveys of the Beechwoods SAC.</p>
There is an intention to build next to Hatherley Brook near to the A46 (marked as HB in some plans). This stream boundary area is an important wildlife habitat, as well as an attractive area for people (and furthermore a flood-risk area, and of limited development value). This area was not included in the JCS.	The Hatherley Brook runs through the allocation site at Leckhampton. However, this does not mean that it will be built on. The brook provides an important habitat and is obviously an area at risk from flooding. Therefore, other policies within the JCS and Cheltenham Plan will prevent it from being built upon.
It is not adequate for this document to simply cross-reference JCS Policy SD9.	JCS policies should not be restated in local plans.
The Conservation (Natural Habitats) Regulations 1994 has been amended a number of times and the latest consolidating legislation is ' <i>The Conservation of Habitats and Species Regulations 2017</i> '.	Noted – this point is considered a minor alteration to the plan text and will be updated in due course.

Residential Development

Issue	Council response
Support for the area 'Reeves Field' not being included for housing allocation.	Noted.
<p>Objections to Leckhampton site allocations for various reasons, including:</p> <ul style="list-style-type: none"> The allocation of 250 houses exceeds the recommendation by the JCS Inspector of around 200 houses; The proposed location of the school 	<p>The site allocation is justified by a substantial body of evidence which has explored reasonable alternatives across the borough. Sustainability Appraisal confirms that Leckhampton is a sustainable option and SALA confirms that it is deliverable.</p>

<p>playing fields within the proposed Local Green Space;</p> <ul style="list-style-type: none"> • Air Pollution; • Increased traffic on already congested roads; • More Air Quality Measurements and Monitoring are needed as part of the Masterplanning; • Flooding on site and downstream; • Impact on wildlife; • Make sure that areas HB, R2 and R3 are never developed; • The school should have been part of the JCS. 	
<p>Other sites for the secondary school should be considered, possibly on the Green Belt. This would be in response to the transport planning, to avoid more traffic congestion and air pollution.</p>	<p>There is no transport evidence which suggests that locating the new secondary school on any particular part of the south of Cheltenham would have significantly lower impact on congestion.</p>
<p>Policies H1 and HD8 should be amended to indicate a capacity for the whole site of approximately 260 dwellings.</p>	<p>National policy puts an emphasis on making the most efficient use of land. The approximate numbers of dwellings in the Cheltenham Plan are based on the size of the area and an appropriate density. It is important to make the most out of available sites because there are very few other opportunities for development within the borough.</p>
<p>The whole of the Leckhampton site should revert to Policy H1, land allocated for around 350 dwellings.</p>	<p>National policy puts a clear emphasis on the need to provide enough school places. The local education authority has produced evidence to show a demand for secondary school places in the south of Cheltenham which cannot be met through existing schools. The County Council has also put forward reasons why the site as shown in the Cheltenham Plan is the most appropriate of all options.</p>
<p>The new school at Leckhampton should be located within the County Council lands.</p>	<p>National policy puts a clear emphasis on the need to provide enough school places. The local education authority has produced evidence to show a demand for secondary school places in the south of Cheltenham which cannot be met through existing schools. The County Council has also put forward reasons why the site as shown in the Cheltenham Plan is the most appropriate of all options.</p>
<p>The approach to selecting the school site is not compliant with the requirements of the Strategic Environmental Assessment Directive or that of the Environmental Assessment of Plans and Programmes Regulations 2004. The school selection has been undertaken without</p>	<p>The site allocation options have been subject to Sustainability Appraisal. The inclusion of the secondary school in the Leckhampton site is also addressed in the SA which found that the “implications for the overall findings of the SA are not significant”.</p>

reasonable assessment of alternative and is an omission from the Council's lawful requirement.	
<p>Objections to Policy HD4: Land off Oakhurst Rise site allocations for various reasons, including:</p> <ul style="list-style-type: none"> • Overdevelopment/density; • Inadequate access /increase in traffic/safety of pedestrians and cyclists; • Loss of existing green space/cross country running facility; • Impact on local community; • Impact on wide variety of wildlife/protected species; • Impact on local infrastructure – schools and GP surgeries already oversubscribed; • Flooding and drainage/increase in surface water run-off; • Adverse visual impact on AONB/reduction in landscape quality; • Removal of trees and hedgerows; • Noise and pollution during and after construction; • Increased air pollution; • Impact on setting of nearby Grade II and Grade II* listed buildings; • Lack of affordable housing; • Overlooking/loss of privacy to neighbouring properties; • Proximity to St. Edward's Preparatory School; • Contrary to Charlton Kings Parish Plan. 	<p>The site allocation is justified by a substantial body of evidence which has explored reasonable alternatives across the borough. Sustainability Appraisal confirms that Oakhurst Rise is a sustainable option and SALA confirms that it is deliverable.</p>
<p>Policies HD1 and HD2 should be amended to omit the playing fields or state that the playing fields are to be replaced.</p>	<p>The latest Playing Pitch Strategy (PPS) for Cheltenham classifies HD1 as a lapsed playing field and recommends considering use of the land for development with reinvestment into sports provision elsewhere. HD2 was not included in the PPS as a playing field.</p>
<p>Given the continuing delay to the consideration of the strategic sites, this is going to adversely affect the housing supply. Cheltenham has a recognised history of persistent under-delivery. Therefore the contingency of just 1% is inadequate to provide against the failure of sites to deliver. Furthermore, if this approach is maintained in the plan, then Cheltenham will not be meeting its OAN in the early years of the JCS plan period. The inadequacy of the supply of housing will have detrimental social and economic consequences.</p>	<p>The housing requirement and housing supply figures for Cheltenham are set out in the JCS. Any changes to those figures will come through a review of the JCS. The JCS housing requirement figures include uplift for economic growth, affordable housing and a 20% buffer.</p>
<p>The proposed development of Prior's Farm Fields</p>	<p>The AONB report was taken into account when</p>

seems to be in contrast with the evidence base provided by the Landscape and Visual Review of Allocated Sites. The land at Prior's Farm Fields is not as well served by public transport as other locations.	assessing the Prior's Farm allocation. Further, more detailed landscape work was carried out and is included in the evidence base.
The position of the Brockhampton site outside the Urban Area needs to be made more specific in the title to show it is LAND TO BE REMOVED FROM THE GREEN BELT.	This site has been removed from the Green Belt already as part of the JCS.
Suitable reserve sites should be identified in line with the trajectory and 10% contingency outlined in the JCS which can be delivered quickly to ensure that needs are still being met despite any slippage on strategic sites.	The housing requirement and housing supply figures for Cheltenham are set out in the JCS. Any changes to those figures will come through a review of the JCS. The JCS housing requirement figures include uplift for economic growth, affordable housing and a 20% buffer.
There is no general housing policy relating to the quantum of housing to be provided or to the Council's expectations in terms of quality, environment and impact.	The housing requirement and housing supply figures for Cheltenham are set out in the JCS.
The Plan is not based on a proportionate evidence base and has ignored the Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB within the Cheltenham Borough.	The landscape evidence is considered to be robust. The recommendations of the AONB report have been fully taken into account.
A number of proposed allocations are silent in respect of important minerals and/or waste safeguarding matters.	Policies for waste and minerals can be found in the adopted minerals and waste local plans. It would be inappropriate for the Cheltenham Plan to repeat these.
Several of the allocations identified at Policy H1 and attendant site-specific policies fail the soundness test of being justified resulting in over-optimistic dwelling numbers.	Officers have taken a cautious approach to the dwelling numbers for each site.
The Council should publish suitable evidence in advance of the examination, setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence-based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period.	The County Council as education authority for the area has produced pupil forecasts which show a substantial need for secondary school places in the south of Cheltenham.
Amend the housing target within the site-specific requirements section of Policy HD2 to a minimum of 75 dwellings.	All the housing numbers under Policy H1 are approximate and should be read as minimums.
Amend site-specific requirements within Policy MD3 to a minimum of 100 dwellings.	All the housing numbers under Policy H2 are approximate and should be read as minimums.
The Council's evidence base fails to indicate the likely impact on the significance of the architectural and historic interest of the Conservation Area in regards to HD2.	The Historic Environment Appraisal has assessed the impact of development at HD2 on the St. Mark's Conservation Area.
Historic England suggests that the Plan include an additional 'site-specific requirement' to make sure future developments at HD3 and HD7	Although the listed cemetery and lodge are not specifically mentioned in these policies, it is considered that other policies in the JCS and

safeguard the significance of the adjacent heritage assets, respecting the setting of the Grade II listed Cemetery and Lodge.	Cheltenham Plan will sufficiently safeguard heritage assets.
HD8 – Historic England considers that as the affected heritage assets are a Scheduled Monument and several listed structures, it is reasonable to expect a specific and moderately detailed heritage report that assesses whether, how and to what degree the setting of these assets makes a contribution to their significance; and demonstrates the assessment of the effects of the proposed allocation on that significance to determine whether measures to maximise enhancement and avoid or minimise harm might be effective.	The Historic Environment Appraisal has assessed the impact of development at HD8 on the Scheduled Monument and several listed structures. A detailed heritage impact assessment will be required as part of any subsequent planning application. Such an assessment cannot be undertaken until a detailed scheme has been formulated.
Make explicit that the long-term plan is for the rest of the green space to remain green for the foreseeable future.	The JCS Policy INF3 provides strong protection for existing green infrastructure.
Proposed sites include: <ul style="list-style-type: none"> • Land at Kidnappers Lane • Shaw Green Lane • Glenfall Way • Reeve's Field • Prestbury Road • Land at Morris Hill • The Hayloft • Tim Fry Landrovers • Cromwell Court • Land to the north of Lake Street 	The Council was already aware of the majority of these sites. They have been discounted for several reasons.

Housing mix and standards

Issue	Council response
I would urge the Council to provide greater clarity on the impact of the threshold setting, not just for the proposed St. Paul's area but across the town.	The policy for HMOs relies on an up-to-date and accurate evidence base of properties. At present this evidence only exists for the St. Paul's ward.
I would urge the council to formulate and include specific details on the future provision for Cheltenham's disabled community.	The JCS design policies include requirements for applications to demonstrate inclusive design. Access and use of buildings and facilities is part of building regulations (Approved Document M).
Objections to extension of PUA at Chestnuts Farm, Branch Road/Grovefield Way and The Hayloft on The Reddings	These additions to the PUA represent minor alterations which are considered to merely reflect the existing urban character of those areas.
Object to the use of settlement boundaries to restrict otherwise sustainable development from coming forward.	The use of settlement boundary policy is considered to be legitimate and this approach was found sound in the JCS.
Add paragraph as follows, after point d) of Policy	This policy addition is not considered

HM3: <i>'Development involving the loss of residential accommodation may be permitted where the loss of residential units is necessary to deliver an enhanced living environment as part of a wider estate regeneration strategy'.</i>	appropriate because wider social benefits will already be taken account as part of the existing policy framework.
The policy should identify that there is a duty for the local authority to 'give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period'.	This requirement is already laid out in national legislation and guidance so does not need to be restated in local plan policy.

Gypsies, Travellers and Travelling Showpeople

Issue	Council response
If you need to have a permanent allocation for travellers why not use the old bus station that has been left abandon since I moved here 35 years ago.	This site has not been made known to the Council as being available for this type of re-development.
If the site is now made permanent, will restrictive conditions still apply? <ul style="list-style-type: none"> – Will it be a personal permission as before, limiting occupation to the existing family? – Should the family no longer need it, will the land be restored to its original state? – If not, what does the Borough envisage? – Will the site be able to be sold on? – Will the Borough have any control then of future occupants? – Will there be a risk that change of use to residential will be sought? 	The GTAA identifies a need for pitches which we must seek to provide. It would not be appropriate to include precise details of any future planning application in the Cheltenham Plan. The policy must retain flexibility to adapt to the particular circumstances of the case.
Retrospective acceptance of occupation for a temporary period and the policy need to identify sites within the Borough, does not provide grounds for its suitability for selection as a permanent site within the protected area of the Cotswolds AONB.	The reasoning for selecting this site is set out in the Cheltenham Plan.
CBC must redouble any efforts they have made in the past to find a suitable official site.	The Council as a whole is aware of its duties in this regard. In terms of planning policy we are somewhat limited because we have to rely on willing landowners coming forward.

Health and Environmental Quality

Issue	Council response
Whilst I support a school being built, I would	Air quality within Cheltenham is closely

regard putting it in Kidnappers Lane without a sensible but drastic policy to deal with pollution reckless and irresponsible.	monitored because of the recognised issues. The JCS Policy SD14 requires new development to result in no unacceptable levels of air pollution and to expose no unacceptable risk to existing sources of pollution. The Council is also required to produce air quality reports and action plans if necessary.
Include Active Design	JCS Policy SD4 places an emphasis on the role design plays in contributing to healthy and active lifestyles.
Suggested addition to this policy (SL1), e.g. on buildings of four or more storeys, take management and/or mitigation measures to help prevent suicide. Mitigation measures should be well designed and incorporated into the design of the building.	This suggestion is noted and had it been made earlier in the process may have been included. However, its exclusion now is not considered to be an issue of soundness.
The Cheltenham Plan does not point out any specific plans for effective management of air quality.	Air quality within Cheltenham is closely monitored because of the recognised issues. JCS Policy SD14 requires new development to result in no unacceptable levels of air pollution and to expose no unacceptable risk to existing sources of pollution. The Council is also required to produce air quality reports and action plans if necessary.
I am very concerned about the general lack of attention in this draft plan to the ever-increasing issues that local residents face in Cheltenham of flood risk.	Numerous pieces of flooding evidence have been produced in the past several years for the majority of allocation sites. Clearly, flooding remains an issue in Cheltenham despite significant infrastructure improvements. However, the evidence demonstrates that the proposals in the plan will not have a significant impact on flooding. Detailed flood modelling and mitigation will be required as part of planning applications.
Policy SL1 makes reference to Policy SD15 in the JCS. That Policy does not exist and therefore Policy SL1 is not justified.	Noted – This is a typographical error due to JCS policies being renumbered. It will be amended.
At this time we question the soundness of the plan and recommend the SFRA is updated to ensure the plan is informed by a robust and detailed evidence base. This is also important to ensure the ST can be carried out in accordance with the guiding principles of the NPPF and NPPG.	Numerous pieces of flooding evidence have been produced in the past several years for the majority of allocation sites. Clearly, flooding remains an issue in Cheltenham despite significant infrastructure improvements. However, the evidence demonstrates that the proposals in the plan will not have a significant impact on flooding. Detailed flood modelling and mitigation will be required as part of planning applications.
It is essential that the Cheltenham Plan be revised to offer a proactive approach for flood risk and drainage, in line with current Government requirements and policy, and	Numerous pieces of flooding evidence have been produced in the past several years for the majority of allocation sites. Clearly, flooding remains an issue in Cheltenham despite

awareness of climate change. Supplementary Planning Guidance documentation is also necessary and we would wish to offer our full support and participation in drafting this, so that Cheltenham (like Tewkesbury) can develop a sensible set of supplementary planning guidelines covering flood risk and drainage management.	significant infrastructure improvements. However, the evidence demonstrates that the proposals in the plan will not have a significant impact on flooding. Detailed flood modelling and mitigation will be required as part of planning applications. Following submission of the Cheltenham Plan, work will commence on updating and producing new Supplementary Planning Documents. A flooding SPD is considered to be necessary.
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Transport Network

Issue	Council response
Where travel planning is part of a S.106 agreement, the signatory authority needs to have more teeth to ensure that the travel planning is implemented at the time specified.	This concern is noted; however, monitoring and enforcement of planning decisions and S106 agreements falls outside the scope of a local plan.
Further detailed analysis work is needed before the plan can be found sound. How are retail and commercial businesses to thrive in the town centre when access policies are being restricted, by an over-congested road network, an out-of-town train station, expensive buses and restricted parking? This policy will destroy the town centre and encourage business relocation to outlying areas of Cheltenham/elsewhere in Gloucestershire which are easily accessible.	There are a number of issues here which fall outside the scope of the Cheltenham Plan. The allocation policies in the plan have been subject to transport assessment which shows that they will not have a significant detrimental impact.
Local public transport should be subsidised to encourage sustainable public transport use; this would be more economic and pragmatic than the proposed Park and Ride expansion.	Noted; however, this power lies outside of the scope of a local plan.
Parking charges should be abolished in the evenings and at weekends.	Noted; however, this power lies outside of the scope of a local plan.
To date, the Council has failed to give consistent and meaningful protection of the former Cheltenham – Stratford-upon-Avon railway, 'The Honeybourne Line', from prejudicial development. Three major breaches of the trackbed have been made, which would make restoration of original alignment for heavy rail difficult if not impractical. Therefore a protected alternative alignment should be designated, linking existing main line to Cheltenham Racecourse station. Such a link would bring major economic and transport benefits.	The Honeybourne Line is being safeguarded for future sustainable transport which could include light rail.
Support for the approach of moving away from single car usage. However, this will only happen if cycleways are fully funded for establishment	These issues will be looked at in future Transport Plans in collaboration with Gloucestershire County Council.

and maintenance. Current issues include potholes; mixed pedestrians and cyclist routes; safety issues; low hanging branches. These definitely need to be overcome should the school at Leckhampton go ahead as proposed.	
Objection to making parking more expensive for short term visits; better to encourage people to use public transport through subsidies etc.	Noted; however, this power lies outside of the scope of a local plan.
The Arle Court Park and Ride needs to be dealt with, often full to capacity for parking as the spaces are taken up by surrounding local businesses who should not park there.	Noted; however, this power lies outside of the scope of a local plan.
The plan does not address the issues of the transport infrastructure arising from the development proposals at North West Cheltenham. It does not consider the wider implications on the transport network in general. Specific details are required for traffic alleviation measures for Tewkesbury Road and the area in and around Swindon Village and Princess Elizabeth Way.	The details of this will be dealt with through the planning application process for the site.
Junction 10 of the M5 must be a 4-way movements junction before West Cheltenham is developed.	This will be considered as part of the planning application process for the site, with any planning conditions attached as to when development can start.
Stop penalising motorists: free parking in the town should be increased, the road network generally needs to be improved, and the blocking and slowing of traffic should cease. It is destroying Cheltenham.	The Cheltenham Plan needs to be in conformity with the measures laid out in the NPPF in order to be found sound; these include the move away from unsustainable modes of transport.
The prospect of no longer-stay car parking would not promote the economy of the town centre, and allow people to shop and eat. Long-stay and short-stay should be explained to qualify amount of time meant by each phrase.	The parking requirements for Cheltenham town centre have been looked at in detail and an action plan has been agreed.
It is imprudent to rely on policies in the JCS and Cheltenham Transport Plan to resolve existing and potential new transport issues in Cheltenham. Cheltenham has issues with no orbital road and being physically constrained. The Cheltenham Plan should address these issues.	Strategic-scale issues are dealt with in the JCS. The Cheltenham Plan is supported by evidence which shows that the proposed development will not have a significant impact on traffic.
Princess Elizabeth Way is already at capacity which will likely get worse with the closure of Boots Corner. This issue should be addressed through the Plan.	Strategic-scale issues are dealt with in the JCS. The Cheltenham Plan is supported by evidence which shows that the proposed development will not have a significant impact on traffic.
Without a specific transport policy there is nothing to inform a proper assessment of the impacts of development sites. Relying on developers and the late evidence to the JCS is unsatisfactory. Furthermore the impact of the	The JCS transport policy is considered to be adequate and further Cheltenham Plan policies would be redundant.

Cheltenham Transport Plan will be felt for a long time. This should be covered in the Plan.	
Traffic at Arle Court and the B&Q roundabouts needs addressing.	Strategic-scale issues are dealt with in the JCS. The Cheltenham Plan is supported by evidence which shows that the proposed development will not have a significant impact on traffic.
Promotion of Cheltenham as a cycling town should be considered; this should be included in the text around sustainable transport infrastructure along with promotion of safe and segregated cycle network.	Both Policies SD4 and INF1 of the JCS prioritise more sustainable modes of transport such as cycling. Interventions on the existing network are likely to be informed by the Cheltenham Transport Plan.
Recent town centre road layout changes are a complete disaster.	Noted; however, this power lies outside of the scope of a local plan.
The two policies in this section could be considered sparse coverage considering the range of issues Cheltenham faces in relation to transport.	The JCS transport policy is considered to be adequate and further Cheltenham Plan policies would be redundant.
Objection to the Plan dealing incoherently with the need to develop public charging points for electric vehicles. The mention of it in new residential developments is welcome, but cross-referencing in the chapter on green infrastructure would be welcomed.	Policies in the JCS support the installation of electric vehicle charging points. Applications for such facilities in existing parts of the town will need to be judged on their individual merits.
The infrastructure for sustainable modes of transport needs to be in place first before you can expect people to switch to these methods of travel.	As a local authority we are partially reliant on developers to come forward with schemes. This limits the ability to invest in costly, speculative work. However, the policies in the JCS and Cheltenham Plan provide a strong base to work with developers on producing well-connected schemes.
Assuming largely buses-only traffic into the town centre, is the increased fleet of buses required for all these modal shift passengers to be allowed further to clog up our better shopping streets, continuing to reduce Cheltenham's street appeal? Developing Royal Well will add to this problem. Until all diesel buses are phased out, the increased number needed for all these passengers will contribute significantly to the town's air quality problems. Suggests a bus management policy is required.	Any development of the Royal Well area will require an acceptable strategy to deal with buses which has a positive impact on pedestrian areas.
Policy TN1- an alternative route to connect the Gloucestershire Warwickshire Steam Railway to a new junction with the main line in the Swindon Village area does not appear to have been considered.	No substantive and compelling evidence for this scheme has been produced to justify such a significant use of land.
A robust plan is needed that includes specific alleviation measures for the Lower High Street up to and including the M5 motorway, taking account of the developments proposed at North West Cheltenham and West Cheltenham.	Strategic-scale issues are dealt with in the JCS. The Cheltenham Plan is supported by evidence which shows that the proposed development will not have a significant impact on traffic.

There is no coherent consideration of how the morning traffic resulting from the new school at Leckhampton will be accommodated- it is naïve to believe that all children will walk or cycle to the school. The A46 is already congested and Church Road is narrow. The 650 application in 2016 was rejected by the Secretary of State due in part to traffic concerns/congestion. Work with the Parish Council to explore mitigation methods.	The Cheltenham Plan is supported by evidence which shows that the proposed development will not have a significant impact on traffic. A planning permission will only be granted where satisfactory transport evidence and mitigation is produced.
Do the sites now identified for development in the Cheltenham Local Plan result in different transport impacts to those already identified in the JCS evidence base?	The Phase 1 (Transport Assessment) Report describes a sensitivity test whereby DS7 was taken as a starting point and alteration to trip matrices were made to take account of the differences between the JCS assumptions and the Local Plan allocations.
Concern that the Local Plan, on its own, does not include policies which adequately manage the delivery of development in relation to the delivery of the schemes included in DS7, so that severe transport impacts do not arise. Policy INF1 of the JCS states, in relation to the Transport Network, planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan. It is noted that the pre-submission version of the Local Plan includes no such policy and it is recommended that consideration is given to whether the JCS policies (specifically INF1) apply to all development in the JCS plan area, or if the same policy should also be included in the Local Plan.	The policies in the JCS apply to the entire Joint Core Strategy area unless otherwise stated. The Joint Core Strategy is a key part of the development framework for Cheltenham Borough, with which the Cheltenham Plan should be in general conformity. Both of the plans, once adopted, should be taken into account when assessing applications for development, and therefore there is no need for the Cheltenham Plan to repeat text or policies included in the JCS, unless specific additional local detail is required.
As mitigation measures are already set out in the JCS, Transport Assessments will be required to determine how much development can proceed in advance of the JCS Highway interventions being in place, as assessed at the time of submission of the relevant planning applications. It is recommended that this is made clear in the Plan Policies.	The site-specific policies in the Cheltenham Plan, as well as JCS Policy INF1, require development proposals to clearly demonstrate that transport impacts will be acceptable and what mitigation is required.
Reference should be made to the JCS Transport Strategy including the six-point plan designed to strengthen local and regional connectivity and improve the desirability of the JCS area as a destination.	JCS policies should not be restated in local plans.
Reference should be made to the adopted	The Local Transport Plan is specifically referred

Gloucestershire Local Transport Plan 2015-2031 in general and with reference to evidence, issues and proposed schemes pertaining to Cheltenham Borough and the JCS area.	to in the JCS chapter on the Transport Network.
A policy should be included encouraging and supporting improvements to the railway station and surrounding area, reflecting the key role it plays in the life of the town.	A site-specific policy is not considered to be necessary. The importance of the station to the town will be taken into account during any relevant planning application.
At the moment it would be challenging for GCC as Highway Authority to support those sites where a need for (possible) mitigation has not been identified.	The JCS and Cheltenham Plan transport evidence has demonstrated that there are ways in which the level of proposed development can be accommodated on the network. More specific mitigation cannot be identified until more detailed schemes have been proposed.
The Cheltenham Plan is intended to complement the JCS and be delivered during an overlapping timeframe. However, the Phase 2 Transport Assessment does not consider the combined effects of the Plan allocations and those of the JCS. Additional mitigation may be required to accommodate the Plan allocations. The Plan allocations would reduce any existing spare capacity on the highway network and could bring forward the date when the DS7 mitigation package would need to be implemented.	The Cheltenham Plan sites were included in the JCS transport modelling, albeit with less certainty over their location. The Cheltenham Plan transport work has used DS7 as a basis and provided more specific locations for development.
Arup's assessment has examined insufficient junctions anywhere near to South West Cheltenham, where the plan is proposing most of its housing and secondary school development.	The junctions that have been studied were determined through a careful selection process.
In the evidence, no junctions within Cheltenham are assessed, except for four junctions in the north east of the town.	The junctions that have been studied were determined through a careful selection process.
CTP's deletion of Cheltenham's sole 'Inner Ring Road', even on a "trial" basis, is so very harmful to traffic circulation/flow through historically constricted townscape that it needs to be mentioned as a proposal in the Local Plan.	The closure of Boots' Corner is not forecast to have a significant impact on overall traffic flows around the town. The measure is also temporary and if significant impacts are found through the trial period then these can be taken into account during planning application stage.

Green Infrastructure

Issue	Council response
The policies relating to Green Spaces do not tally with what has previously been permitted.	Policies in the Cheltenham Plan will manage land use going forward, and may differ to policies that have previously been used.
The A40 corridor should be designated Local Green Space as it meets all criteria	Local Green Space can also be designated through Neighbourhood Development Plan and Plan review if further sites are considered to

	require designation.
Local Green Space can be located next to a main road; other LGS allocations are next to main roads.	The important issue is whether the proposed LGS forms part of a highway verge which has the potential to be required for some sort of highway works in the future.
The A40 corridor is referred to by Gloucestershire County Council as a wildlife corridor. It is more than just a roadside verge as it includes wooded areas, as demonstrated in GCC's Tree Survey and Arboricultural Assessment in 2015, parts of which are in private ownership.	Noted; description of the land can be changed in the supporting background paper.
The identification of 82 areas of LGS would further constrain the availability of land and therefore the ability to meet the economic and social needs of the Borough, particularly in relation to housing. No consideration is made for future requirements in the next round of local planning or for a review of the JCS or Local Plan should delivery of allocated housing sites slip.	The selection of the LGS sites has included a consideration of future development needs. The majority of the sites have been subject to longstanding planning protections and are not suitable for development.
Given the high number of windfalls proposed as part of the housing trajectory, the allocation of a substantial part of the edge of Cheltenham (Leckhampton) as LGS will limit the potential to deliver said windfalls.	The majority of windfall sites in Cheltenham come from within the existing urban area so the designation of LGS at Leckhampton is not likely to have an impact on future windfall delivery. Furthermore, the windfall allowance used in the supply calculations was examined through the JCS Examination in Public and found sound.
The lack of accessible green space is not a sound basis for allocation as LGS. Furthermore, much of the proposed LGS allocation at Leckhampton Fields is in private ownership so may not be accessible even once allocated.	The lack of other green space is not the principle reason for designating the Leckhampton LGS. The Parish Council and local residents have put forward a compelling and thorough reasoning for protection of that landscape.
The site comprises 39.31 hectares of land which is the largest LGS allocation in the Plan by over 15 hectares. Indeed, it is over ten times larger than the next largest proposed LGS allocation that is not part of a strategic allocation or is not an existing PGS site. Given the sheer size of the proposed allocation, it is clear that it is not local in character and does represent an extensive tract of land.	There is no specific definition for 'extensive tract of land' and it must be judged on a case-by-case basis. The Leckhampton site was looked at in detail during the JCS examination and the Inspector was satisfied with the principle of the LGS extent.
Kidnappers Lane should be included within the LGS allocation at Leckhampton, as it is a significant part of the valued landscape. Kidnappers Lane is an integral part of the Inspector-noted 'figure-of-eight' Walking Loops, which underpin the amenity value of this 'Valued Landscape', and which has led to its proper designation as an LGS.	Discrepancies with the maps will be addressed. Kidnappers Lane should not be part of the LGS because the designation would potentially cause problems for statutory highways works.
The Leckhampton LGS boundary is inconsistent and should be amended.	Discrepancies with the maps will be addressed to provide a consistent boundary.
Emphasis should be given to the expectation of	JCS Policy INF2 requires suitable Sustainable

the implementation of SuDS, in line with draft NPPF.	Urban Drainage Systems.
The proposed LGS designation for West Cheltenham is excessive in scale and is contrary to the NPPF and NPPG. The extent of the LGS should be reduced.	The extent of the LGS in West Cheltenham is a compromise between several points of view. The masterplan for the Strategic Allocation continues to evolve and the LGS element will need to be discussed at examination.
Lack of clarity between information shown in the JCS and that in the Cheltenham Plan, particularly regarding the North West Cheltenham allocation and associated Local Green Space. Clarity sought over the official boundaries of the site, LGS and Green Belt in that area.	The North West Cheltenham LGS was discussed at the JCS examination hearings, resulting in a recommendation that a green buffer should be designated around Swindon Village. The masterplan for the Strategic Allocation continues to evolve and the LGS element will need to be discussed at examination.
Site HD6 is allocated in both the JCS and the Cheltenham Plan.	Site HD6 is located next to the North West Cheltenham Strategic Allocation but is not in it.
The PUA boundary should be revised to include the buildings on land to the west of the North West allocation to reflect the built development in this area.	These buildings are not within Cheltenham Borough so cannot be added to the PUA boundary in the Cheltenham Plan.
Provision of a meaningful link between existing community and development of West Cheltenham will be critical to ensuring that the emerging development West Cheltenham is properly integrated with the existing community and facilitates pedestrian, cycle and public transport linkages between the new development and Coronation Square - the main District Centre and community hub within the western part of the town. The current LGS proposal would not allow this to happen.	Creating strong links between the West Cheltenham Strategic Allocation and the existing communities in the west of the town is extremely important and forms part of the JCS policy for the site. Careful masterplanning is ongoing and falls outside of the Cheltenham Plan process.
Some form of extension to the external footprint of the building (Cheltenham Town Hall) may be necessary in order to deliver the essential and desirable components which will ensure a viable future for the Town Hall which meets the aspirations of current and future generations, which could impact on any designation of the Imperial Gardens, although the Gardens' value is recognised. Flexibility is sought in this matter	Noted – All policies contain an element of flexibility due to the nature of competing demands and specific circumstances that arise.
A topic paper covering all aspects of green infrastructure would have been expected rather than only covering Local Green Space, which does not deal with specific details mentioned in the chapter included in the plan.	The JCS Policy INF3 contains specific policies relating to Green Infrastructure.
LGS designation of Victoria Cricket Ground does not meet the criteria set out in paragraph 77 of the NPPF.	A completed LGS toolkit was submitted by a local community group in 2015. Officers consider that this site does meet the NPPF criteria.
Will the approach taken in the Cheltenham plan allay Natural England's earlier fears that additional damaging recreational use of the	The accompanying HRA covers this topic.

Cotswold Beechwoods may arise from adopting the Local Plan.	
The wooded area along the side of the A40 helps to lower pollution levels caused by the heavy traffic using the A40; another reason why the A40 should be given LGS designation.	Reasons for not designating this area as LGS are set out in the LGS topic paper.
The development of St. Edward's school fields would be detrimental to area currently a green field supporting a wide variety of wild life and well established trees. Hence this would not enhance existing landscapes (Policy D3b)	The biodiversity and openness of the site has been considered as part of the site assessment process.
The square in Unwin Road and the area in the prefabs on Reddings Road close to the roundabout with Hatherley Lane should be shown as Public Green Space and maintained as such.	No compelling evidence has been produced to demonstrate that this site is special to the community.
Seeks clarification over why Land off Oakhurst Rise was assessed for development before being assessed for LGS designation.	Local Green Space designation should not stand in the way of sustainable development.
The range of green spaces and play areas within the Battledown Park development phases 1-3 (formerly GCHQ Oakley) should in due course be given Public Green Space or Local Green Space protection.	Local Green Space can be designated through either review of a local plan or through a neighbourhood development plan. Further locations for LGS designation can be considered at these stages of plan making.
Hardwick Green (Campus) should be included as Local Green Space due to its value and importance to local residents.	Reasons for not designating this area as LGS are set out in the LGS topic paper.
Trees in town, parks and gardens need stronger protection to make it more difficult to remove them unless they are diseased or dangerous.	Tree protection is subject to separate legislation. The importance of trees to townscape and the environment is recognised in existing policies.
The removal of front gardens in favour of parking space is unchecked and causes problems regarding surface water run-off leading to additional flood risk.	The paving over of front gardens is commonly achieved through Permitted Development.
Explicit reference should be made to the need for new developments to plan for and incorporate green infrastructure comprehensively throughout the development process. The Building with Nature benchmark should be referenced in relation to this.	JCS Policies SD4 and INF3 provide explicit requirements for developments to contribute to green infrastructure.
In relation to the school playing fields at Leckhampton being considered appropriate use of LGS, it is invalid practice to declare a concession in policy in a Plan for just one proposed site	Policies referring to specific sites are considered to be legitimate provided they have adequate evidence to justify them.

Social and Community Infrastructure

Issue	Council response
Not enough GPs/health care facilities to attend to current population.	Noted, however this power lies outside of the scope of a local plan.
Current wording of Policy CI1 is seeking improvements rather than meeting the needs generated by the development. Policy CI1 should be deleted.	Policy CI1 only seeks improvements to meet the impacts of the proposed development.
No evidence such as Infrastructure Delivery Plan to support allocation of site for school at Leckhampton. Suitable evidence should be provided in advance of the examination	Gloucestershire County Council have committed to funding a secondary school in the south of Cheltenham.
The plan does not set out a clear overarching strategy for improving Cheltenham's infrastructure which will be needed with the proposals for growth.	Improving existing infrastructure is an issue which goes beyond the limits of a local plan. There are, however, policies which seek to mitigate any impacts of new development.
Support for Policy CI3, although four allotment sites should be identified in paragraph 17.29- Croft, Sappercombe, Haver and Ryeworth	Noted.
Request that the addition of cultural facilities be added to the list outline in paragraph 17.11	The list in paragraph 17.11 is not designed to be exhaustive. It provides guidance on what a community facility could be.
In addition, the Consortium notes that CIL is being proposed by the JCS with an Examination in Public due to commence in May 2018. CI1 is therefore not necessary.	Even after the implementation of CIL, section 106 agreements will still be sought for certain site specific contributions.

Renewable Energy and Low Carbon Energy Development

Issue	Council response
Chapter fails to address multiple sources of low-carbon energy that could be developed in Cheltenham.	JCS Policy INF5 supports the development of renewable energy or low carbon energy schemes.
Fails to address the use of low-carbon energy in low-emission vehicles and other engines.	Policies in the JCS support the installation of electric vehicle charging points. Applications to such facilities in existing parts of the town will need to be judged on their individual merits.
Policies for the provision of PVAs on buildings and other structures should be included in accordance with industry best practice.	JCS Policy INF5 supports the development of renewable energy or low carbon energy schemes.

Delivery, Monitoring and Review

Issue	Council response
Up-to-date planning status should be considered when monitoring local plan	Planning permissions are monitored on an annual basis through the Residential and Non-residential monitoring reports. These will be used to help monitor the plan.

How will site E2 be defended at appeal on the current Local Plan?	This does not fall within the scope of the Cheltenham Plan, but rather the applications process.
Questions what the introduction of Sui Generis uses would result in on Site E2.	The detailed land uses would be dealt with at the planning applications stage, but only Sui Generis uses that exhibit characteristics of traditional B-Class uses would be supported on the site, unless material considerations could be demonstrated to suggest other land uses are more appropriate.
Should reconsider the indicator- Number of planning applications that are within a conservation area, as it is unclear how this will indicate how the objective has been met.	By monitoring the number and type of applications being granted and refused planning permission within a conservation area it will indicate the effectiveness of the policies relating to the conservation areas, and thereby demonstrate how the plan is “conserving and enhancing” conservation areas. Wording could be improved to better explain this indicator.
The plan lacks a sufficiently detailed methodology of the control measures for Delivery, Monitoring and Review. Lacking measures to control the type of housing developed.	The types of housing required is informed by the Strategic Housing Market Assessment, this will be taken into consideration during the applications process.
Lacking control mechanisms for the type of housing developed, to meet planning requirements and that of the local community.	The types of housing required are informed by the Strategic Housing Market Assessment. This will be taken into consideration during the applications process.
The plan needs to be robust enough to deliver the required volume of affordable housing.	Alongside the Plan there are a number of Council initiatives to encourage the development of affordable housing at the required rate as identified in the JCS.
There should be a fair, phased release of a maximum of 4-5 years’ worth of sites. Further release of sites should not take place until these sites have been developed.	This approach would not be compliant with national policy, as the Borough is experiencing a shortfall in housing delivery, and is required to demonstrate a sufficient supply of housing.
Brownfield sites should be developed before greenfield and/or green belt sites.	All sites that have been submitted to the Council are considered based on their suitability for development, however, Brownfield sites will often take longer to develop, due to the potential on-site constraints that need to be mitigated before development can take place.
Controls needed to ensure services and community facilities are developed and operational in readiness to support proposed residential developments	Planning obligations can be used to ensure such services are delivered.
113 dwellings to be provided through the Cheltenham Plan allocations does not provide sufficient flexibility to ensure delivery of the necessary scale of housing required. At present there is only circa 1% of flexibility, suggests the between 10% and 20% would be more	The amount of dwellings being provided through the Cheltenham Plan meets the amount required by the Joint Core Strategy.

appropriate.	
Feel windfall allowance is too high and not achievable due to the constrained nature of Cheltenham. Unaware of compelling evidence to support such a high figure. Any allowance should be realistic and have regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.	Windfall allowance and methodology was covered in detail through the JCS examination in public, with evidence provided. The JCS Inspector found that the JCS authorities approach to windfall was sound.
The 2006 Cheltenham plan included a focus on development control but this latest plan does not. The final plan must show how development and planned development can be monitored reviewed and controlled.	The Monitoring Delivery and Review section of the Cheltenham Plan, when read in conjunction with that of the JCS demonstrates how the plan will be monitored.
Number of planning applications is not a sufficient way of monitoring the conservation area. The conservation area can be affected by small changes and the cumulative effects. These should be monitored. Suggest periodic assessments of areas; recording the loss of key vistas due to development and noting of increases in traffic noise and pavement parking in residential areas.	As an authority we are required to produce conservation area management plans and to keep these up to date. This is a more appropriate place to monitor and record these types of issues than through the local plan.
Monitoring should be presented annually in one document covering all items in tables 12-14 (including that covered by the JCS) so that residents can get an overview of all round progress.	Monitoring of the plan will be presented in the authority monitoring report each year.

APPENDIX 6 - Cheltenham Plan Scoping Questionnaire



Cheltenham Plan Scoping Questionnaire

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

Contact details:

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

Agent Details:

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

Title (Mr,Mrs,Ms,Miss,Other)..... Name Organisation (if relevant)..... Job Title (if relevant)..... Address

Title (Mr,Mrs,Ms,Miss,Other)..... Name Organisation (if relevant)..... Job Title (if relevant)..... Address

1. Do you have any comments on the timetabling for producing the Cheltenham Plan?

Please see Process & Timetable section within Scoping Document

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

3. Please tell us *your* vision for Cheltenham

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

5. Name one thing in Cheltenham that you like

6. Name one thing in Cheltenham you think needs to change

7. Below is a list of objectives compiled from the existing Local Plan. Please indicate how important you think each of these objectives is (please cross one box for each objective):

	No View	Not Very Important	Quite Important	Very Important
To achieve a high standard of design in new development				
To reduce crime and the fear of crime				
To make provision for identified development needs				
To create more sustainable patterns of development, with priority use of previously-developed land				
To meet the needs of the elderly and people with disabilities				
To conserve and improve Cheltenham's architectural townscape and historical heritage				
To conserve and improve Cheltenham's landscape character and green environment				
To prevent coalescence of Cheltenham with other settlements				
To reduce waste and energy consumption and conserve natural resources				
To maintain and enhance the economic vitality of the borough				
To safeguard land and buildings in existing employment use, or if unoccupied, last in employment use				
To meet housing requirements, including the need for affordable housing				
To maintain and enhance the vitality and viability of the town centre as a sub-regional shopping centre				
To increase the range of facilities for recreation and leisure				
To encourage provision of a range of facilities and attractions for tourists				
To encourage the retention and provision of a range of community facilities and services				
To promote sustainable transport				
To ensure infrastructure in development is provided to a satisfactory standard				

8. Are there any other objectives that you would suggest?

9. How can we make the objectives more specific to Cheltenham?

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

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

10. Do you think we have missed anything?

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

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

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

COMMENTS:

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

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

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

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

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

APPENDIX 7 - Cheltenham Plan Issues and Options Questionnaire



Cheltenham Plan Issues and Options

Questionnaire

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

Contact details:

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

Agent Details:

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

Title (Mr,Mrs,Ms,Miss,Other) Name Organisation (if relevant) Job Title (if relevant) Address
--

Title (Mr,Mrs,Ms,Miss,Other) Name Organisation (if relevant) Job Title (if relevant) Address
--

Return no later than 5pm on Monday 3rd August 2015 to:

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

EMAIL: localplan@cheltenham.gov.uk

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

Please select one option.

YES	NO
-----	----

Q1a: Please state your reasons why.

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

Please select one option.

YES	NO
-----	----

Q2a: Please state your reasons why.

.....

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

Please select one option.

YES	NO
-----	----

Q3a: Please state your reasons why.

.....

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Q4: Does this policy approach address the identified issues?

Please select one option.

YES	NO
-----	----

Q4a: Please state your reasons why.

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Q5: Which policy option do you support?

Please select one option.

- ☐ OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2
- ☐ OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development
- ☐ OPTION 3: Protect the best and evaluate the rest
- ☐ OTHER OPTION

Q5a: Please state your reasons why.

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Q6: Are there any issues and/or options which have been missed that you feel should be added?

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

Please select one option.

YES	NO
-----	----

Q7a: Please state your reasons why.

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

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Q9: Does this policy approach address the identified issues?

Please select one option.

YES	NO
-----	----

Q9a: Please state your reasons.

.....

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Q10: Which policy option do you support?

Please select one option.

- ☐ OPTION 4: Introduce selective management of Cheltenham's economy
- ☐ OPTION 5: No policy intervention
- ☐ OTHER OPTION

Q10a: Please state your reasons why.

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Q11: Are there sectors that you think should be promoted ahead of others?

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Q12: Are there any issues and/or options which have been missed that you feel should be added?

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Q13: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
-----	----

Q13a: Please state your reasons why.

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Q14: Does this policy approach address the identified issues?

Please select one option.

YES	NO
-----	----

Q14a: Please state your reasons why.

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Q15: Which policy option do you support?

Please select one option.

- ☐ OPTION 6: Introduce a cyber security cluster
- ☐ OPTION 7: Do not promote cluster development
- ☐ OTHER OPTION

Q15a: Please state your reasons why.

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Q16: Do you agree the Cheltenham Plan should promote a cyber security cluster?

Please select one option.

YES	NO
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Q16a: Please state your reasons why.

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

Please select one option.

YES	NO
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Q17a: Please state your reasons why.

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

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

Please select one option.

YES	NO
-----	----

Q19a: Please state your reasons why.

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Q20: Does this policy approach address the identified issues?

Please select one option.

YES	NO
-----	----

Q20a: Please state your reasons why.

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Q21: Which policy option do you support?

Please select one option.

- ☐ OPTION 8: Allocate all designated 'Public Green Spaces' as 'Local Green Spaces'
- ☐ OPTION 9: Maintain existing local 'Public Green Spaces' and only allocate 'Local Green Spaces' that meet the Framework's criteria
- ☐ OPTION 10: Maintain existing approach of designating local 'Public Green Spaces'
- ☐ OTHER OPTION

Q21a: Please state your reasons why.

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

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

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

Please select one option.

YES	NO
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Q24a: Please state your reasons why.

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

Please select one option.

YES	NO
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Q25a: Please state your reasons why.

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

Please select one option.

YES	NO
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Q26a: Please state you reasons why.

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Q27: Do you agree that the sites that have been coloured 'green' on the housing maps represent the most suitable to consider allocating for future housing development?

Please select one option.

YES	NO
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Q27a: Please state you reasons why.

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Q27b: If no, which sites coloured green on the housing map do you disagree with and why? *Please state the site reference and your reason.*

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Q28: Do you think a site that is not coloured 'green' on the housing maps should have been?

Please select one option.

YES	NO
-----	----

Q28a: Please state the site reference and your reason.

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Q29: Do you agree that the sites that have been coloured 'amber' on the housing maps represent potential for allocating for future housing development?

Please select one option.

YES	NO
-----	----

Q29a: Please state your reasons why.

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

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

Please select one option.

YES	NO
-----	----

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

.....

.....

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

Please select one option.

YES	NO
-----	----

Q31a: Please state your reasons why.

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

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

Please select one option.

YES	NO
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Q32a: Please state the site reference and your reasons why.

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

Please select one option.

YES	NO
-----	----

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

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

Please select one option.

YES	NO
-----	----

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

.....

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

Please select one option.

YES	NO
-----	----

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

.....

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

.....

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

Please select one option.

YES	NO
-----	----

Q37a: Please state your reasons why.

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Q37b: If no, which sites coloured green on the employment maps do you disagree with and why? Please state the site reference and your reason.

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Q38: Do you think a site that is not coloured 'green' on the employment maps should have been?

Please select one option.

YES	NO
-----	----

Q38a: Please state the site reference and your reasons why.

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.....

Q39: Do you agree that the sites that have been coloured 'amber' on the employment maps represent potential for allocating for future employment development?

Please select one option.

YES	NO
-----	----

Q39a: Please state your reasons why.

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

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

Please select one option.

YES	NO
-----	----

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

.....

.....

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

Please select one option.

YES	NO
-----	----

Q41a: Please state your reasons why.

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

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

Please select one option.

YES	NO
-----	----

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

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

Please select one option.

YES	NO
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Q43a: If so, please supply details such as an address and a site plan.

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

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

- ☐ Website
- ☐ Email
- ☐ Social media
- ☐ Advertising/display
- ☐ Library
- ☐ Word of mouth
- ☐ Database contact

Other:

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

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

APPENDIX 8 - Cheltenham Plan (Part One): Preferred Options Questionnaire

Contact details:

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

Cheltenham
Borough Council

Cheltenham Plan (Part
One): Preferred Options
Questionnaire

Planning Policy

January 2017

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

Name

Organisation (if relevant)

Job Title (if relevant)

Address**Postcode****Telephone****Email**

The purpose of this consultation is to hear your views on the Cheltenham Plan. [The consultation document](#) provides the Council's preferred options for the future Plan and includes a set of questions for you to answer.

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

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

Question 1

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 2

Do you agree with the [Preferred Strategy for the economy?](#) (page 14)

Yes ☐ No ☐

Please enter any additional comments below.

Question 3

Do you agree with [Proposed Policy EM1](#) Safeguarding Key Existing Employment Land and Buildings? (see [Appendix A, Proposals Map, and Site Maps](#)) (page 21)

Yes ☐ No ☐

Please enter any additional comments below.

Question 4

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 5

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 6

Do you agree with [Proposed Policy EM4](#) Promoting the Cyber-Security Sector? (page 29)

Yes ☐ No ☐

Please enter any additional comments below.

Question 7

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 8

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

GE8A ☐ GE8B ☐

Please enter any additional comments below.

Question 9

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

Yes ☐ No ☐

Please enter any additional comments below.

Note

If you know of a site which is suitable for housing development and should be included in the Cheltenham Plan please submit information via the '[Call for Sites](#)' form.

Question 10

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

Yes ☐ No ☐

Please enter any additional comments below.

Note

If you know of a site which is suitable for mixed use development and should be included in the Cheltenham Plan please submit information via the '[Call for Sites](#)' form.

Question 11

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 12

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 13

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 14

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

Yes ☐ No ☐

Please enter any additional comments below.

Question 15

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

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

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

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

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

APPENDIX 9 - Cheltenham Plan Pre-Submission Representation Form

This is the 'regulation 19' consultation on the Cheltenham Plan Pre Submission Draft – as such we are asking specifically for representations regarding the soundness of the document, rather than more general opinions (the plan has previously been through three rounds of public consultation, July-September 2013, June-August 2015 and February-March 2017).

The tests of soundness are set out at paragraph 182 of the NPPF, summarised as: positively prepared, justified, effective, and consistent with national policy.

If you believe the Cheltenham Plan is unsound in its current form please tell us why – with as much detail as possible – by filling in the following form. You can make as many comments as you wish by copying / pasting the cells - please ensure distinct issues are covered by separate comments.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a further opportunity to make representations at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The document, questionnaire, maps and supporting evidence can be downloaded via our online consultation webpage consult.cheltenham.gov.uk

Alternatively you can send your responses using one of the following methods:

- Email: localplan@cheltenham.gov.uk
- Post: Planning Policy, Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham, GL50 1PP

Please return to Cheltenham Borough Council by midnight on 9th April 2018. Submissions received after the deadline will not be accepted.

Personal details

Name	
Organisation (if relevant)	
Representing (if relevant)	
Address	
Email address	

Do you consider it necessary to participate at the Examination in Public?	<input type="radio"/> Yes	<input type="radio"/> No
Why do you feel it is necessary to participate at the Examination in Public?		

Do you wish to be notified about any of the following next steps: <ul style="list-style-type: none"> • Submission of the Cheltenham Plan for public examination by an independent inspector; • Publication of the Inspectors recommendations; and • The adoption of the Cheltenham Plan. 	<input type="radio"/> Yes	<input type="radio"/> No
---	---------------------------	--------------------------

If you wish to make more than four distinct comments please submit an additional form

Comment 1

Do you consider the document is Legally Compliant?

☐ Yes

☐ No

Do you consider the document is Sound?

☐ Yes

☐ No

If you answered no to one or both please explain under which test you contend that the Cheltenham Plan Pre-Submission document is unsound and set out your reasons.

What changes do you suggest to make the document legally compliant or sound?

To which part of the Cheltenham Plan Pre-Submission document do these comments relate? (please be specific and identify the relevant policy / paragraph / site details)

Comment 2

Do you consider the document is Legally Compliant?

☐ Yes

☐ No

Do you consider the document is Sound?

☐ Yes

☐ No

If you answered no to one or both please explain under which test you contend that the Cheltenham Plan Pre-Submission document is unsound and set out your reasons.

What changes do you suggest to make the document legally compliant or sound?

To which part of the Cheltenham Plan Pre-Submission document do these comments relate? (please be specific and identify the relevant policy / paragraph / site details)

Comment 3

Do you consider the document is Legally Compliant?

☐ Yes

☐ No

Do you consider the document is Sound?	<input type="radio"/> Yes	<input type="radio"/> No
If you answered no to one or both please explain under which test you contend that the Cheltenham Plan Pre-Submission document is unsound and set out your reasons.		
What changes do you suggest to make the document legally compliant or sound?		
To which part of the Cheltenham Plan Pre-Submission document do these comments relate? (please be specific and identify the relevant policy / paragraph / site details)		

Comment 4

Do you consider the document is Legally Compliant?	<input type="radio"/> Yes	<input type="radio"/> No
Do you consider the document is Sound?	<input type="radio"/> Yes	<input type="radio"/> No
If you answered no to one or both please explain under which test you contend that the Cheltenham Plan Pre-Submission document is unsound and set out your reasons.		
What changes do you suggest to make the document legally compliant or sound?		
To which part of the Cheltenham Plan Pre-Submission document do these comments relate? (please be specific and identify the relevant policy / paragraph / site details)		