

Dear Inspector,

I regret that my Parliamentary duties mean that I am unable to address the Cheltenham Local Plan Examination hearing in person. Thank you for the opportunity to make written representations.

As you will be aware I have made previous representations which I have referenced below. I have attached a copy for ease of information. Whilst I do not propose to repeat those points, I do wish to draw your attention to what I believe to be continued weaknesses within the submitted plan.

Economic Strategy and Employment Opportunity:

As I referenced in my initial submission, the proposals tend to be passive in nature, rather than active (*submission point 4-7*). Although there are of course welcome elements, they do not yet knit together into a clear and long-term strategic vision for Cheltenham's economic future.

At a time of growing local and online competition, Cheltenham needs to do more than merely set out an aspiration for a "prosperous and enterprising economy". The Local Plan needs instead to map out a coherent and detailed vision for a town that is flexible, progressive, and open for business. There could be greater ambition for economic growth and employment opportunities.

There are nevertheless positive elements, which it is right to highlight. Most obviously, I welcome the fact that the Council is now actively (and effectively I might add) supporting the development of Cheltenham as a cyber hub (*submission point 9*), a vision first set out in 2014. This vision has been supported by central government with £22 million in DfT money and has the potential to create new jobs and opportunities and boost the town's economy. The Plan must also consider what other employment opportunities can be made available for local people and our younger people as part of the development. I hope our University along with those in Bristol, Bath, Birmingham and Cardiff will start developing educational programmes which can support this new industry. Opportunities are available through the upcoming 'University Enterprise Zones' too.

Second, I also welcome any efforts to tackle the derelict North Place eyesore. However, the plan should commit to a more ambitious and sympathetic vision for its redevelopment than the previous proposals for the site. The government has had to intervene financially in the failed North Place - Portland Street development (*submission point 11/19*).

I would also call on the Council to prioritise the publication of a clear and sympathetic blueprint for the redevelopment of Royal Well/Municipal Offices, in keeping with its high visibility town centre location.

It is disappointing that tourism merits just three paragraphs (*submission point 13*). Equally, there appears to be no coherent strategy to enhance the other industries in our town, including retail, light industry, advertising, public relations and the creative arts? Promoting technology should not be a zero-sum game.

Housing growth and Affordable Housing:

The Plan misses the opportunity for re-designation of vacant commercial properties, particularly in the town centre, for housing and mixed-use. With a Future High Streets fund worth £650 million set aside by central government, funding exists for a shake-up in planning rules to respond effectively to the changing world of retail. There is little if any sign that this Plan intends to take advantage of that. There is also limited recognition of the opportunity for redevelopment of long term derelict town centre and edge of centre sites (*submission point 21*).

I have assumed that the methodology that has been adopted to select the specific sites, housing numbers and types for development is sound and robust. I look for appropriate confirmation that this is not the case.

Given this primary assumption, the proposed locations for new residential development will inevitably prompt local disagreements and challenges. However, the late addition of the St Edwards' school land referenced as "Oakhurst Rise" for residential development should be removed and the land protected from future build.

In terms of affordable housing, I welcome the brief reference to the use of shared equity schemes. However I suggest that the council provide more detail (*submission point 22*). This is an opportunity to identify and encourage the development not just of shared equity but other schemes, including Shared Ownership, Staircasing, Rent to Homebuy, Help to Buy Equity schemes, OPSO – Older People's Shared Ownership and Resales and HOLD – Home Ownership for People with Long-Term Disabilities.

On that latter point, I would urge the council to formulate and include specific details on the future provision for Cheltenham's disabled community, which is a troubling omission.

On the proposed HMO policy 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 plan would further benefit for clarity on how the council proposes to utilise the Government's changes on "developer landbanks", housing provision for key workers and access to borrowing.

Infrastructure:

This plan fails to take the opportunity to set out a clear overarching strategy for improving Cheltenham's infrastructure, including road, rail and broadband links.

Given the considerable projected growth in housing numbers, coupled with the welcomed expansion of our local employment base; improvements to the town's strategic infrastructure must be given greater emphasis.

In both my previous submissions I have "invited clearer emphasis on promoting Cheltenham as a cycling town". It would be clearer if the language referring to creating a 'sustainable transport infrastructure' were tightened to include a direct reference to promoting a safe and segregated cycle network (*submission point 25*).

I would welcome the inclusion of practical measures that will encourage more sustainable means of transport. However, I note that in its limited comments on the subject, the council has merely referenced protection of the Honeybourne Line and taken the position on long stay car parking that "commuter parking should be discouraged" in the Core Commercial Area.

I am conscious that late submissions are being requested to support the safeguarding of the route of a Southern rail connection between the GWSR and the Midland Main Line. This would include the concept of creating a park-and-ride station at the eastern end of such a connection, with parking available on the racecourse's adjacent car park. Whilst such a park-and-ride and its connection to the main line may be of little economic benefit to the GWSR, it would be of significant benefit to Network Rail, the Jockey Club (the owners of Cheltenham Racecourse) and Cheltenham Town.

The late request makes the case that the creation of such a park-and-ride station would greatly relieve the pressure on Cheltenham Railway Station, which is used by 2.5m passengers per year, has very limited parking and has one heavily-used single track siding. Improvements are programmed for the station, which will need extra capacity to cater for Midlands Connect, which has aspirations for additional services to be operated via Cheltenham.

Those in support argue that a connection would also enable Racecourse specials from London, Bristol and Birmingham to once again have direct access to the Racecourse, thus eliminating substantial race-day traffic congestion in Cheltenham. The Racecourse specials would be able to be accommodated on the new connecting line.

I understand that the situation has been discussed with senior planners at the Council, I am unclear whether the Borough Council has agreed to a late modification supporting deviation safeguarding of the proposed new route and/or the creation of a new park-and-ride station

I am regularly (and increasingly) contacted by constituents who are frustrated at the refusal to honour the previous commitment to introduce free town centre parking after 6pm. I share that frustration, as I believe it would encourage visitors to the town centre.

I welcome the fact that the plan recognises my previous point that all new developments, both residential and commercial should have access to broadband. However the proposed wording simply refers to “high speed” and there is no specific reference to “superfast” broadband. I believe this should therefore be amended.

Alex Chalk MP

Submission to Cheltenham Local Plan

Introduction

1. I am grateful for this opportunity to respond to the Cheltenham Plan Pre-Submission Version (Regulation 19).
2. I do not propose to repeat in detail my two previous submissions to the local plan process, which include references to specific development sites and Local Green Space sites which appear again in this consultation document. Nor would it be helpful to comment on every aspect of this lengthy consultation document (which includes matters of granular detail ranging from ‘Areas of Special Control for Advertisements’ to the conversion of rural buildings).

Summary

3. This is valuable work in this document, much of which I agree with and wholeheartedly support. I am grateful to those who have contributed to it.
4. My lingering disappointment, however, relates to the section on employment (just 17 pages in a 162-page document). It is hard to avoid the overall impression that the proposals tend in the main to be more passive than active. They react to and reflect current events and development opportunities, rather

than establish a clear and long-term strategic vision for Cheltenham's economic future. Although there are welcome elements (see, for example, the references to preserving employment space) this does not yet amount to a truly coherent and ambitious statement of intent for the town.

5. Coherence and ambition can rarely have been more vital. Cheltenham faces a highly competitive environment, with economic challenges from Gloucester, Oxford, Bath, Bristol and others. Our town needs to generate jobs and opportunities for young people who might otherwise feel forced to move away. That is important in its own right; but it is doubly important in an era of devolution where local authorities will be retaining (and relying on) future business rates. Unless Cheltenham can secure a strong pipeline of business rates, local people and local services will suffer. And in light of the Athey Consulting report (2014), which made for sobering reading about Cheltenham's competitiveness, the task is urgent indeed.
6. We should reject the contention that Cheltenham does not aspire to grow its local economy at the same rate as the national economy, and wants instead to "focus on wellbeing and quality of life" (cf the suggestion from one commentator in their submission to the 2017 consultation). It is a fallacy to suggest that these are somehow mutually exclusive. They are not, as the overwhelming body of expert economic opinion accepts. It is also well accepted that the alternative to economic growth is stagnation and decline. Instead, we should be ambitious for economic growth, whilst recognising that investment needs to be ethical, sustainable and environmentally friendly.
7. In short, in a competitive environment, Cheltenham needs to do more than merely set out an aspiration for a "prosperous and enterprising economy" [Para 2.8]. Instead it must set out specific policies which send out the clearest possible signal that the town is open for business.

Positives

Welcome Objectives

8. Many of the objectives are excellent and I agree, for example, with the following (not an exhaustive list):
 - a. the need to generate more “adaptable and flexible employment space” [Para 2.8(b)];
 - b. the aspiration to “Conserve, manage and enhance Cheltenham’s natural environment and biodiversity” [Para 2.9(b)], including:
 - i. 5.5 ha of ancient woodland at Timbercombe [Para 10.17]
 - ii. 5 ha of ancient woodland at Glendale Wood [ibid]
 - c. Resisting the inappropriate development of residential gardens [Para 5.17]
 - d. Conserving the borough’s historic environment [Para 9.8]
 - e. Working with housing enablers such as CBH to deliver 100 per cent affordable housing schemes on redundant small-scale Council owned sites [Para 12.4]
 - f. Encouraging proposals that bring vacant floorspace above shops back into beneficial use, particularly for affordable residential accommodation [Para 12.5]
 - g. Protecting community facilities [Para 17.11].

Cyber

9. I am delighted that the Council has come on board and is now supportive of the development of Cheltenham as a cyber hub, a vision I first set out in a speech to local stakeholders at IT firm, Converge Ltd, in 2014. This strategy envisages building a partnership of public and private cyber security activities and related business opportunities. The Government has given this vision a vote of confidence, with the announcement of £22 million in DfT money to enable a new cyber hub. This will create new jobs and opportunities and be a major boost for the town’s economy. I am grateful for the contribution made by CBC councillors and officers to help deliver this vision.

Allocation of Employment Land

10. The proposal to introduce a “robust framework” to “help steer the way in which existing employment land and premises are managed” is welcome. If, by that, it is suggested that the Council will be able to use the planning process to ensure that employment land is put to productive, job-creating, use I would entirely support that.
11. It would be a mistake to allow the potential to repeat the mistakes of the past where (a) North Place was planned to be allocated for another town centre supermarket for which there was little demand (b) permission was given for a flagship BMW garage which took up large tracts of green space but generates relatively few jobs.

Negatives

12. As noted above, the plan falls some way short of a clear vision to develop employment prospects.
13. It is disappointing that tourism merits just three paragraphs. The suggestion that “future approaches will aim to capitalise on the town’s role...as...a leisure destination in its own right” simply repeats an aspiration that has existed for many years, as indeed has the “aim to capitalise on the town’s role as a gateway to the Cotswolds”. That strap line is already on signs leading into Cheltenham.
14. 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. Promoting technology should not be at the expense of other vital sectors. I do recognise, however, that retail policies are planned to be reviewed in due course [Para 4.2].

15. The Plan does not take the opportunity to set out a clear overarching strategy for improving Cheltenham's infrastructure, including road, rail and broadband links. Given the considerable projected growth in housing numbers, coupled with the welcomed expansion of our local employment base, improvements to the town's strategic infrastructure merit far greater emphasis.

Housing

16. Turning to the issue of housing, I have assumed that the methodology that has been adopted to select the specific sites, housing numbers and types for development is sound and robust.
17. Given this primary assumption, my starting point in terms of comments on the proposed locations for new residential development are that, while the overall figures are not necessarily contested, there will inevitably be local disagreements and challenges.
18. Turning to one in particular, the late addition of the St Edwards' school land referenced as "Oakhurst Rise" for residential development should be removed and the land protected from future build. No good case has been made for the loss of this important green space.
19. I would urge the Council to be clear with the community on how it plans to take advantage of the Government's investment in the Portland Street site. It should commit to a more ambitious and sympathetic vision for its redevelopment than the previous proposals for the site.
20. I would also call on the Council to prioritise the publication of a clear and sympathetic blueprint for the redevelopment of Royal Well/Municipal Offices, in keeping with its high visibility town centre location. There is no recognition

that the controversial plans proposed to close Boots Corner could prove to be unsuccessful and would necessarily impact on any future development.

21. Town centre “brown field” locations such as Carlton Street, which have been vacant for many years should be given a higher priority for development, and I would encourage more to be done in order to achieve this - but crucially with a design which genuinely reflects the prevailing architectural rhythm and design. Pastiche is not a dirty word, and the Council should allow for a plan which builds on its successful architectural achievements in Albion Street and elsewhere in Carlton Street for example. The opportunity should be taken to create a design code which would preclude the kind of wholly inappropriate design brought forward in the past in respect of the old GPO site on Carlton Street (and subsequently approved). Nowhere is that more important than in a town with such a unique architectural heritage.
22. In terms of affordable housing, I welcome the brief reference to the use of shared equity schemes. However I suggest that the Plan could helpfully provide more detail. This is an opportunity to identify and encourage the development not just of shared equity but other schemes, including Shared Ownership, Staircasing, Rent to Homebuy, Help to Buy Equity schemes, OPSO – Older People’s Shared Ownership and Resales and HOLD – Home Ownership for People with Long-Term Disabilities.
23. On that latter point, I would urge the council to formulate and include specific details on the future provision for Cheltenham’s disabled community, which is a concerning omission.
24. Regarding the proposed HMO policy 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.

Transport

25. Turning to sustainable transport, in both my previous submissions I have “invited clearer emphasis on promoting Cheltenham as a cycling town”. It would be clearer if the language referring to creating a “sustainable transport infrastructure” were tightened to include a direct reference to promoting a safe and segregated cycle network.

26. I would welcome the inclusion of practical measures that will encourage more sustainable means of transport. However, I note that in its limited comments on the subject, the Council has merely referenced protection of the Honeybourne Line and taken the position on long stay car parking that “commuter parking should be discouraged” in the Core Commercial Area.

27. The National Planning Policy Framework (NPPF) states that “Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles”. I would repeat my call on the Council to review its decision (a) not to proceed with its February 2016 pledge to scrap car parking charges after 6pm in town centre car parks (b) to hike charges by, in some cases, over 40%.

Broadband

28. Regarding broadband, I welcome the fact that the plan recognises the point made by many that all new developments, both residential and commercial, should have access to broadband. However the proposed wording simply refers to “high speed” and there is no specific reference to “superfast” or “ultrafast” broadband. I believe this should be clarified.