

Section B

Support / Oppose / Comment (please specify)	OPPOSE
RSS Reference – Policy or Paragraph Number	4.0.15
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or **oppose** the Proposed Change:

1. The Cheltenham Green Belt Review, AERC Ref: J8901/R2569 Final Report March 2007, was seriously flawed such that it rated Sub Area G8 as low use when it should have been at high or top end of average. This has resulted in conclusions that are far from what the situation merits and has significant adverse effect on the Green Belt.
2. No reference has been made to the DoE Inspector’s report that concluded that no development should take place on OS parcel No 64 (this is within Cheltenham Sub Area G8).
3. The Cheltenham Green Belt review acknowledges that opinions expressed within are likely to have been influenced by discussions prior to the review which steered the various panels and working parties toward a conclusion without reference to the facts.
4. The review under heading of public forum states that “**Feedback from the session was used by the consultants in the revision of the draft in the light of the comments made. Additional work was done on some of the key issues which were raised by the participants. The scoring of many of the sub-areas was revisited ..**” This indicates that the review was intended to justify previously held beliefs whether these originated locally or in the SW Regional Assembly forums.
5. The Cheltenham Green Belt Review did not use the RSS Best and Most Versatile (BMV) definition of Agricultural land, viz. it gave little value to grade 3a agricultural land nor did it have due regard to PPS7 which supports prevention of urban sprawl (see below).
6. The Cheltenham Green Belt review did not cover the area of Green Belt within the Tewkesbury area and therefore a full consideration of the Green Belt was not achieved nor subject to public Scrutiny.
7. The importance of the Green Belts to prevent coalescence and achieve this goal is still valid.
8. Where commercial development and retail parks have already extended to the boundaries of the Green Belts the presence of these areas of land not only prevent coalescence of one community with another but also prevents commercial developments merging with residential

developments which will assist to keep commercial traffic away from residential areas.

9. It is acknowledged that Green Belt land could incorporate within its areas retained to serve as areas of park land and new woodland as well as flood relief measures such as ponds. As such they would retain their original function as well as providing spaces that can be used by the residents for numerous facilities.
10. The importance of large open spaces for walking and family activities cannot be stressed enough

Section D1

If you wish to expand your response please use the space below.

REFERENCE OUR SUMMARY COMMENT 1, ABOVE

Cheltenham Green Belt Review : Appendix A4.3: Green Belt Purpose and Related Criteria, Points, Weights and Scores

This shows the scoring used for each purpose and related criteria, the points given and the weighting and ranking provided. (Highest ranking is highest multipliers)

Purpose Criteria definition Points

I. Check unrestricted sprawl of large built-up areas

Weight = 3.33, Rank = 3

- a. Impedes ribbon development
=>5 houses 4, <5 houses 2, No development 0
- b. Distance from Cheltenham built up area
0 -0.5km 5, 0.5 – 2km 3, >2km 1

II. Prevent neighbouring towns merging

Weight = 6, Rank = 4

- a. Line of sight distance between one sub area's outer boundary and any other urban area's outer boundary (excluding Cheltenham)
<0.5 km 5, 0.5 - 1km 4, 1 - 1.5km 3, >1.5km 1.

III. Assist in safeguarding the countryside from encroachment

Weight = 1.5, Rank = 2

- a. Nature conservation value
Yes - existence of designated land (statutory) 5
Yes - existence of designated land (non-statutory) 3
No designated land 1
- b. Sites of high quality landscape character (per landscape assessment)
Yes 5, Yes, other designation 3, No 1
- c. Trees
Yes - existence of ancient or other protected woodland, forests, trees, hedgerows 5, No 1
- d. Agriculture
High quality (1 and 2) 5, All other agriculture (Grade 3 and below) 1, No agriculture 0

IV. Preserve setting and special character of historic towns

Weight = 2, Rank = 1

(see following page)

Comments from (organisation, or surname) ...SWINDON PARISH COUNCIL

a. Views of Cheltenham Town Centre

No view of Cheltenham's Town Centre 0, View of Cheltenham's Town Centre 5

b. Contribution to "Gateway"

Within 400m of A4, A4019, A46, A40 5, Adjoining A435 and B4632 3, Within 400m of A435 and B4632 2,

Adjoining any other route into Cheltenham 1, All others 0

c. Conservation Area

Within conservation area 5, Adjacent to conservation area 3, No conservation area 1

(see table on following page)

For Sub Area G8 we believe that the scores are wrong.

Purpose	CBC Green Belt Review	Unranked Totals	Weighted and ranked	Our Assessment	Unranked Totals	weighted	Weighted and ranked
PIa	0			4			
PIb	5			5			
PI total		5	50		9	30	90
PIIa	1			1			
PII total		1	24		1	6	24
PIIIa	1			1			
PIIIb	1			1			
PIIIc	1			5			
PIII d	1			1*			
PIII total		4	12		8	12	24
PIVa	0			5**			
PIVb	1			1			
PIVc	1			3***			
PIV total		2	4		9	18	18
totals		12	90		27	66	156

* We cannot thus far determine whether the Agricultural grade for the land is 2 or 3, scored as grade 3.

** The defined Centre of Cheltenham is visible from G8. As a matter of interest the centre is also visible from Lowdilow Lane, Elmstone Hardwicke in the Tewkesbury Borough in the Green Belt.

*** The site is adjacent to the Conservation Area and is separated from it by Manor Road only.

The unranked score of 27 then makes G8 the highest scoring Sub Area in the review and is thus a far cry from being the weak point in the Green Belt. When weighted and ranked, using the Green Belt Review method it scores 156 and is at the top end of the average bracket range of 112 to 150 and the bottom end of the High bracket range of 158 to 202.

REFERENCE OUR SUMMARY COMMENT 2, ABOVE

Planning Appeal

On a separate issue the easterly part of Sub Area G8 (part OS parcel No.64) was the subject of a planning appeal in 1973 and is interesting in its timeless finding by the Department of the Environment's Planning Inspector. To quote:

4. ... It was argued by the local planning authority ... that to the southwest of these buildings the land sloped down toward Wyman's brook and that while much of this land comprised private curtilages (*ie Stantons drive and Manor road*) it nevertheless formed an effective buffer between the village and the industrial estate to the south.
5. I have considered these arguments most carefully and noted that the area to the north-east of Tewkesbury Road defined by Manor Road, Wyman's Brook and the railway to the east is essentially a large light industrial estate and whilst each of these uses, considered individually, may be definition be of a type acceptable within a residential area, I am firmly of the opinion that the environmental impact of the estate as a whole is such that it should be

retained as a separate entity distinctly detached from the residential development in Swindon.

6. I am therefore of the opinion that it is essential that a buffer of undeveloped land should be retained to the south-west of the village and I accept the argument of the local planning authority that the south-west boundary of the village should logically be determined by topographical features rather than a pure assessment of 2-dimensional form. In my view the sloping ground which includes the appeal site and the curtilages of the aforementioned buildings to the east of Manor Road provides an easily identifiable feature which serves to emphasise the separation of the village from the industrial estate on the lower land to the south and I am firmly of the opinion therefore that the development of the appeal site would, by extending housing development down the hill, detract significantly from this effective feature.
7. I have considered all other matters raised at the inquiry, including your (*the appellant*) submission that there is an acute shortage of land available for housing in this area, but they are not of sufficient weight to override the factors which have brought me to my decision.
8. For the above reasons, and in exercise of the powers transferred to me, I hereby dismiss the appeal.”

Incidentally, the adjoining field OS Parcel 63 is flood plain and development here was previously refused/ application withdrawn.

REFERENCE OUR SUMMARY COMMENT 3, ABOVE

Extract From CHELTENHAM GREEN BELT REVIEW

Page 52

Question 7 – What areas of the Green Belt or adjoining land might be able to accommodate sustainable new development in the future?

Although there were some general anti-development views, **the balance of opinion was towards the north–west of Cheltenham, in the form of an urban extension to the town. It is difficult to say to what extent this had been influenced by previous discussions and by the policy in the draft South West Regional Spatial Strategy.**

Workshop No.5 – Summary of Findings

7.3.13 In their replies, **many of the participants had been influenced by the earlier consultation by the South West Regional Assembly on the Cheltenham/Gloucester Strategic Green Belt Study and the draft RSS. It was not surprising, therefore to find that the main area mentioned was to the north-west towards Junction 11(*sic*) of the M5 motorway.** A sustainable corridor of development would probably include Uckington and Swindon Villages. Many participants thought that any development should be coupled to the construction of a north-west relief road. Some thought the existing mainline railway was potentially a ‘strong’ boundary for future sustainable development.

7.4 Stage Three: Public Forum

7.4.3 **Almost 300 people attended the Forum, a clear indication of the degree of interest in the Green Belt. Feedback from the session was used by the consultants in the revision of the draft in the light of the comments made. Additional work was done on some of the key issues which were raised by the participants. The scoring of many of the sub-areas was revisited and validated, with site visits and discussions with Borough Council officers.**

Section D2

Comments from (organisation, or surname) ...SWINDON PARISH COUNCIL
.....(CHELTENHAM BOROUGH).....

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

4.0.15 To be changed to read “This has required changes to be made to the general extent of the Bristol and Bath, Gloucester ~~and Cheltenham~~ and South East Dorset Green Belts. **The Cheltenham Green Belt Review shall be readdressed in order to amend inaccuracies and due weight be given to the report of planning inspector (ref T/APP/1990/A/73/3389/DS) before changes to the Green Belt are determined. A Green Belt Review should be undertaken by Tewkesbury Borough Council and be subject to normal public consultation and scrutiny. Not withstanding this there shall be no development of OS Parcel 64 whilst OS parcel 63 shall also be devoid of development and remain solely as flood plain land.”**

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 24th October. Late responses will not be accepted.