

FEBRUARY 2015



Andrea Pellegram Ltd.

COTSWOLD DISTRICT LOCAL PLAN
REG.18 CONSULTATION:
DEVELOPMENT STRATEGY AND SITE
ALLOCATION JANUARY 2015

RESPONSE BY CIRENCESTER TOWN COUNCIL

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The consultation process

1. On 16 January, 2015, Cotswold District Council, as the local planning authority opened a 6 week consultation on the document **Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations** ("the Reg 18 document"). It is described as an "informal consultation on key components of the emerging Local Plan. " The full draft local plan, containing detailed development management policies, will be subject to consultation in summer 2015.
2. The current consultation seeks views on:
 - The amount of housing and employment development, and the strategy for its geographical distribution;
 - Proposals to deliver the strategy; and
 - Strategic policies to guide development across the District.
3. As the major settlement in the District, Cirencester features as the key development focus for the plan . Cirencester Town Council is therefore a key stakeholder in the evolution of the local plan.

Background to this report

4. Cirencester Town Council commissioned Andrea Pellegram Ltd. to undertake consultation with officers from Cotswold District Council and other key stakeholders including the County Council, infrastructure/service providers and members of the local community, in order to formulate a considered response to the Reg. 18 document (January 2015).
5. A series of stakeholder events was held covering the topics of:
 - Technical Review of local plan evidence (meeting between District and Town Council officers and consultants) – 8 December 2014
 - Sustainable Transport (walking, cycling and bus) – 15 January 2015
 - Urban realm and green spaces – 22 January 2015
 - Economic development – 23 January 2013
 - Transport (car and parking) – 27 January 2015
 - Sports, Wellbeing, Health – 2 February 2015

A list of participants in these events is set out in [Appendix A](#).

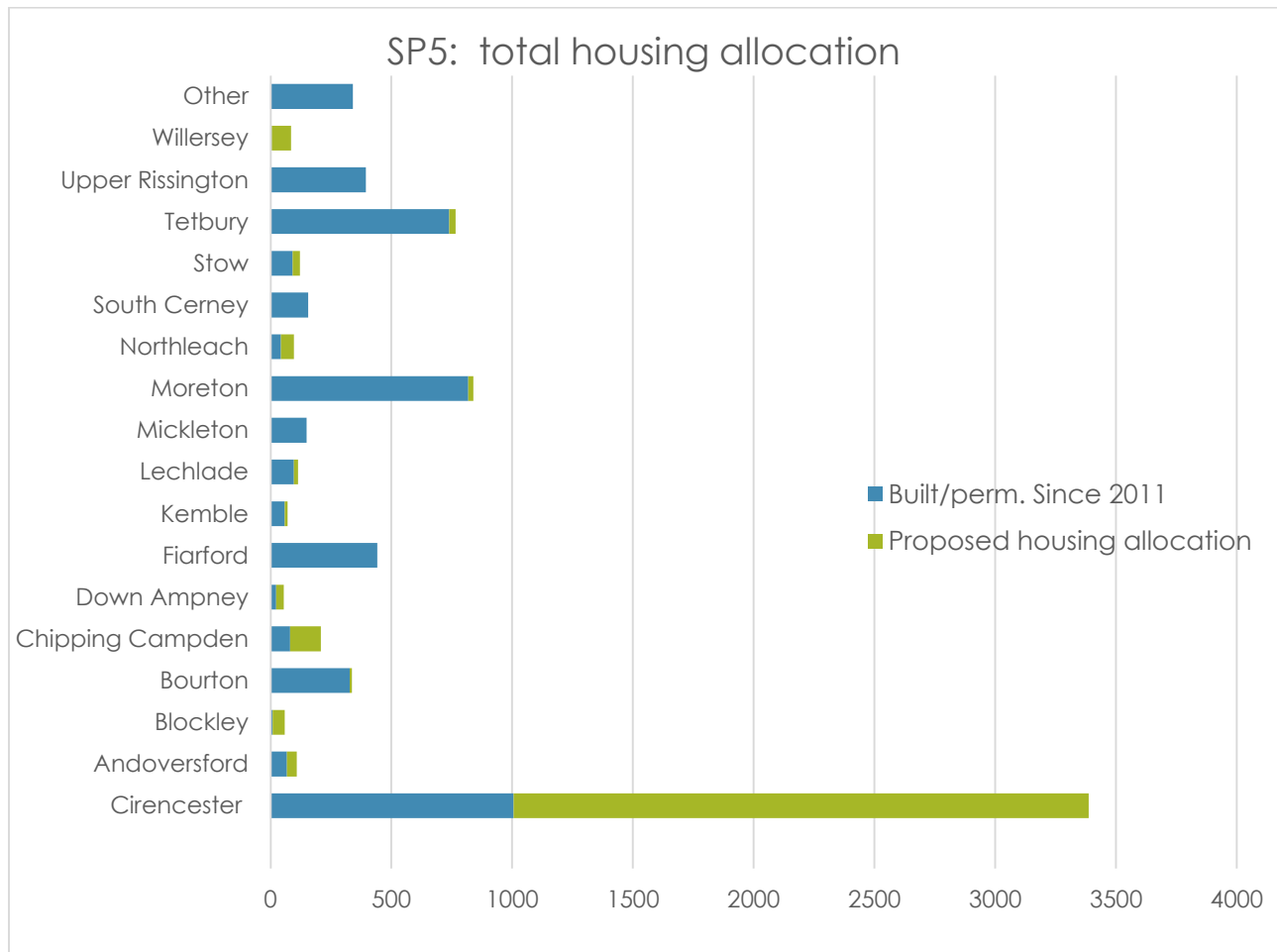
6. Stakeholders were asked to discuss the merit of the planning policy proposals in order to assess local impacts and potential mitigation. The information from the stakeholder events was used to inform the proposals in this report, which analyses the evidence base and proposed an approach for the Town Council to adopt in its response to the Reg. 18 consultation.
7. Coincidentally with this report, Andrea Pellegram Ltd. was also commissioned to review Our Future Cirencester (OFC) which covers many of the issues raised in the Reg. 18 consultation. Where appropriate, reference is made to the outcomes of the OFC consultations. In many cases, community views towards the development proposals can be understood from that perspective.
8. District Council planning officers indicated that any information that would help them prepare detailed development management policies would be welcome. Therefore, this response goes beyond the Reg. 18 consultation on development strategy and site allocation and gives detailed recommendations on delivery and development management.
9. This report was presented to Cirencester Town Council on 10 February 2015 where it was debated and agreed in front of a public audience of around 40 local people. At the same meeting, the Council agreed the final text of the review of Our Future Cirencester and the Concept Statement.

The Development Strategy

Policy SP5 – housing distribution

11. The most important part of the consultation document focuses on the amount and distribution of housing land within the District. **Policy SP5** proposes to distribute approximately 7,500 dwellings amongst 17 sustainable settlements (and a small amount of 'windfall' assumed for delivery within villages). These are shown in [Figure 1](#).
12. The proposed allocation is broken down into two broad elements:
 - Housing built or permitted since the start of the new plan period (2011/12) to the present (2014).
 - New housing allocations for future development by the end of the plan period in 2031.
13. In headline terms, Cirencester is proposed to receive 44% of the total housing allocation over the period, but this hides some stark facts which are a cause for concern.
14. Figure 1 shows that since 2011/12, just over 1,000 dwellings have been completed or permitted in Cirencester (see [Figure 2](#) – 21% of the total in the District over that period). A further 2,381 dwellings are proposed to be built in Cirencester between 2015 and 2031. 2,350 of these are proposed for a single site, at South Chesterton (see [Figure 2](#) – this represents 83% of all newly allocated housing to be built over the remainder of the plan period).
15. Figure 1 also shows the proposed new housing allocations for the rest of the District over the same period from today. Only 500 dwellings are proposed to be built on new housing sites outside Cirencester in the rest of the District between 2015 and 2031.
16. The great bulk of housing to be provided in the rest of the District between 2011 and 2031 as a whole has either already been built or is already permitted. This indicates a strong likelihood that housing delivery in the rest of the District has already occurred or will occur within the next few years (because sites are already permitted), with little planned thereafter.

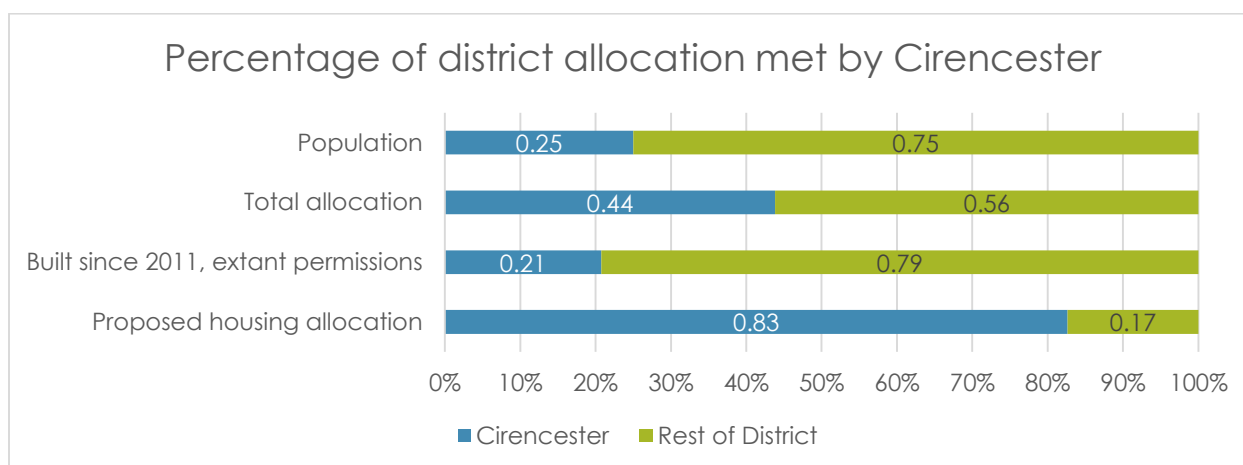
Figure 1: total housing allocation (SP5)



17. Figure 2 breaks the allocation from SP5 down into percentages to enable relative impacts to be considered. It considers Cirencester in relation to the rest of the District. Figure 2 shows that:

- Cirencester's population is 25% of the District total
- Cirencester has been assigned 44% of the total housing allocation
- Cirencester has already had 21% of the housing built since 2011 and extant permissions (this includes Kingshill North and Kingshill South developments)
- Cirencester has been assigned 83% of the new housing allocation (2015 – 2031). This is almost entirely from the South Chesterton allocation.

Figure 2: Percentage of District allocation met by Cirencester



The implications of the proposed allocations

Cirencester's growth

18. Cirencester currently has a population of around 19,000. The new development at South Chesterton will add 5,000 to 6,000 new residents. The South Chesterton allocation therefore will bring growth of around 26% to 32% in Cirencester's population by 2031. The Kingshill developments have already led to an influx of around 2,000 people in the last 4 years. This is evidence that Cirencester is expected to take a disproportionate amount of the housing allocation with a high level of growth.
19. There has been no analysis anywhere in the supporting documentation whether this level of housing demand exists in Cirencester – this is the level of demand for the District as a whole.
20. The Reg. 18 document notes that good practice directs strategic level growth to the "most sustainable locations" (8.1).

In Cotswold District, as in many other areas across the country, the optimum location for this level of growth is the edge of existing large settlements. This is because incremental growth reduces environmental impact and enables cost-effective integration with existing infrastructure. **About 25% of the District's population lives in Cirencester.** A third of all employment is based in the town, and it is listed in the top 200 retail centres in the UK (emphasis added, 8.1).

To help Cirencester remain a good place to live and work, and improve its facilities in the future, **the town must continue to accommodate a sizeable share of the District's future housing and employment** (emphasis added, 8.2).

21. This is insufficient justification why Cirencester is expected to take 44% of the housing allocation (83% of all new allocation to the end of the plan period) for 25% of the population and expand by up to a third in population in 11 years. There is no justification what "a sizeable share" is or how the local planning authority tested this quantum's sustainability, other than the sustainability appraisal which is very strategic and therefore cannot test the impact of an individual site allocation.

District Housing Supply

22. As stated above, the bulk of housing to be provided outside Cirencester is already built or permitted. Looking at housing permissions during 2011-2015, some of the larger schemes were actually granted on appeal after the planning authority had refused permission, often on grounds of a lack of sustainability or because of perceived harm to the AONB in which many are located. Appeals were granted because objectively assessed housing needs were either not known or not being met – there was no local plan and no 5 year housing land supply in place.
23. The relevance of this is two-fold. Firstly, there is a possibility that schemes may not start within the period of their permissions (3 years). Any developer seeking a renewal of planning permission for housing development on a site which was previously resisted may again face refusal from CDC. With an adopted plan with a 5 year housing land supply, appeal outcomes could be materially different. Therefore, there is at least a question over the contribution of some of these sites in local plan terms. The Planning Authority is asked to provide further clarification on the trajectory of build out for the permitted schemes.
24. Secondly, if permitted sites do start and build out within the time periods of their permissions, then housing will be provided in the early part of the plan period from now, thereby exhausting this source of supply in the first part of the plan period. This would then leave the District's housing supply to be met substantially from the South Chesterton site from the middle of the plan period to its end. The ability of the South Chesterton site to take the projected level of housing remains to be confirmed and needs to be tested. On this basis, the District's ability to provide sufficient opportunities for new housing development and maintain a five year housing land supply across the District throughout the plan period from local plan allocations could be considered to be at risk.

Accelerated Housing Delivery in Cirencester

25. The projected 5 year housing land supply is set out in **Table 2** of the **Evidence Paper on housing** and reproduced below in **Figure 3**. It projects an annualised average strategic allocation of 375 dwellings to 2030/31, starting in 2011/12. These assumptions have not been analysed in this report (out of scope) but on the face of it, this pattern of development is questioned.
26. Figure 3 illustrates the proposed new allocation for South Chesterton. Significant infrastructure improvements will be required to be in place before the development phases are occupied and many of these must be delivered through statutory undertakers (see later sections of the response). Considering the development process, and the fact that the master plan for the site has not been agreed, a likely (and optimistic) trajectory for the South Chesterton development, if permitted would be:
 - Master Plan agreed with District Council – early 2016
 - Planning application submitted summer 2016
 - Planning permission autumn 2016
 - Discharge of conditions spring 2017
 - Strategic infrastructure provision (sewerage, site roads, off-site highways improvements, etc.) December 2017¹
 - Begin building 2018
 - First tranche of housing available 2019 (completed)
27. On this optimistic basis, the South Chesterton development would be "live" and delivering housing 2019/20 to 2030/31 (11 years). Dividing the total allocation (2,350) by the years (11), this would mean delivery of 214 houses per year, every year. The realism of this assumption is also questioned. The site will probably be built-out by one or perhaps more housing developers. They will build their schemes in phases, and will only release new phases when the previous phases have been built and sold. They will

¹ The Infrastructure Delivery Plan (2013 draft) states on page 99 that it would take a minimum of 3 years to put in the appropriate sewerage.

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do this to control the supply (so that there is not a glut on the market, causing the house prices to fall) and to ensure that they have sufficient receipts to proceed to the next phase of expenditure and building. Housing developers will therefore only build at a rate of 214 new dwellings per year if that number are close to being occupied. The Town Council requires more evidence that there is sufficient demand in the Cirencester area (as opposed to the entire District) for this level of housing in this period of time.

28. There is also insufficient consideration of whether the existing infrastructure can be sufficiently improved to meet the needs of this level of growth within the timescales and budgets available. The Reg. 18 and supporting documentation, with the exception of the Infrastructure Delivery Plan, are silent on how the new development will be accommodated. The IDP set out extremely ambitious infrastructure requirements but there have been no tests of whether it is realistic that they can be delivered. The proposals assume (it would appear) that all the new infrastructure would be delivered on the back of the strategic allocation. Much more work is required from the local planning authority to demonstrate that this level of growth can realistically be achieved – why is Cirencester a “sustainable” location for this amount of new housing?

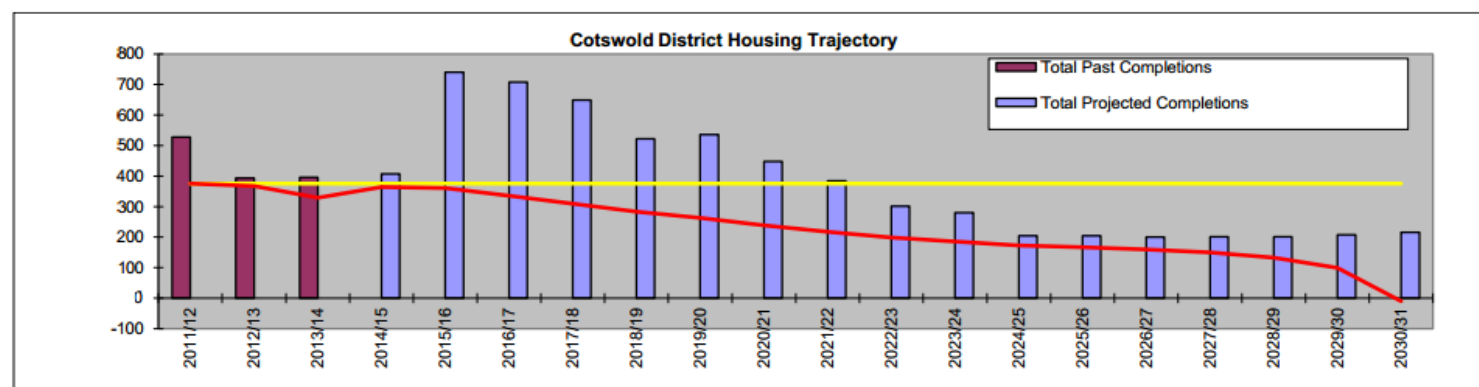
Recommendations:

29. The Planning Authority should be asked to provide further clarification on
- how this level of population growth can be sustained in a relatively short period of time
 - the trajectory of build out for the permitted schemes across the District
 - the trajectory of build out for its proposed South Chesterton Development
 - how the construction impacts will be managed
 - whether the market can sustain that level of provision for 11 years, and whether it is likely that this amount of new housing can be realistically occupied in this timescale
 - why Cirencester is deemed to be a “sustainable” location for this level of additional provision.

Figure 3: Reproduction of Table 2, housing evidence paper

Table 2: Cotswold District Housing Trajectory 2011-2031

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	TOTAL
Total Past Completions	528	393	396																		1317
Total Projected Completions				407	740	708	649	522	536	448	384	301	280	204	204	200	201	201	208	216	6409
Cumulative Completions	528	921	1317	1724	2464	3172	3821	4343	4879	5327	5711	6012	6292	6496	6700	6900	7101	7302	7510	7726	7726
PLAN – Strategic Allocation (annualised)	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	7500
MONITOR – No. dwellings above or below cumulative allocation	153	171	192	224	589	622	1196	1343	1504	1577	1586	1512	1417	1246	1075	900	726	552	385	226	
MANAGE – Annual requirement taking account of past/projected completions	375	367	329	364	361	336	309	283	263	238	217	199	186	173	167	160	150	133	99	-10	



Is the proposed distribution strategy supported by local communities and sound evidence?

The views of local people on the evolution of the strategy

30. This pattern of allocation is the result of a long process that began in 2010 when the South Chesterton site was included in the **LDF Core Strategy Second Issues & Options Paper** (December 2010) as a proposed location for strategic scale development. A summary document produced.² The Second Issues & Options Paper stimulated 1,277 responses from 140 organisations and individuals. The document showed a clear preference for housing to be distributed across the District to serve local housing need. The value of the AONB was not prioritised over the need for new housing. Despite this, the inclusion of the South Chesterton site was confirmed by CDC at this time.
31. An explanation of how this strategy was derived is set out in the **Evidence Paper: Development Strategy (Dev. Strat.)** November 2014. It states that the **Core Strategy Issues and options paper** (2007) "focused development in and around Cirencester". This is a departure of the **Adopted Local Plan** (2001) which sets out "Cirencester's role as the District's main service centre, together with the role of the Principal Settlements in providing everyday services to local communities"(5). The assertion in para 2.1 of the evidence paper should perhaps be questioned that Cirencester was seen as the main location for new development at that time.
32. In 2010, the Core Strategy second Issues and Options Paper was consulted upon. This produced a preferred development strategy (SS3) to "Locate development across Cirencester, market towns, small towns and those local service centres with a reasonable level of facilities.
33. The evidence paper notes:

There was a recurring contradiction in representations received on the 2nd I&OP between those supporting a concentrated strategy and those calling for development to be spread across the District. However, it was clear that there is concern about developing greenfield land, while there was also a desire to support rural villages with appropriate development that would help retain services and facilities. (4.7)
34. The South Chesterton site was subject to high levels of local opposition then (Reg. 18, 4.8) and continues to be today.

² Brief Over-view of Representations made to the Core Strategy Second Issues and Options consultation

Table 1: points raised to the Preferred Development Strategy (2013) relating to Cirencester's strategic allocation³

Main points raised in the consultation	CDC proposed action
By locating half of the housing requirement and bulk of affordable dwellings to the south of the District, the housing needs in other parts will not be met. This is at odds with one of the Strategy's key objectives, which is to allow young people and families to remain in their local settlements	The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.
Strategic" scale development at Cirencester/ Chesterton: <ul style="list-style-type: none"> • Why so much housing in Cirencester/ Chesterton? • This development should be redistributed to other parts of Cirencester or District. • Is there a need for this housing? Much of it will be bought by in-migrants. • Strategic-scale site will ruin historic market town character of Cirencester. • Chesterton is poorly located in relation to strategic routes. • Increased commuting is inevitable, which will exacerbate congestion. Many prospective commuters will be attracted to Chesterton by the relatively close proximity of Kemble station • All forms of infrastructure (schools, health, drainage, water supply, town centre parking, etc.) were cited as being under-provided and/ or will become inadequate/ problematic. • Where will all the jobs be provided? Will employers be attracted? • High quality agricultural land/ open countryside should not be sacrificed. Brownfield land should be prioritised. 	The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence
Smaller-scale developments should be supported in villages, which are struggling to keep their village school, shop, pub and community heart. Limited development, with a mix of open market and affordable housing should be encouraged in the District's larger rural village	A rural housing policy ²¹ has been developed, building upon generic policies 21, 22 and 23 in the PDS. The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.
The Council has appeared not to have given sufficient consideration to the restriction on development imposed by the statutory purpose of AONB designation and paragraphs 115 and 116 of the NPPF.	The Council believes it has given appropriate weight to this issue, particularly when weighed against the fact that 80% of the District, including many of its most sustainable settlements are within the AONB. The distribution of housing will, however, continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.
Planning authorities can make an allowance for windfall sites when calculating a five year land supply and that would also apply for this local plan (NPPF paragraph 48). Cotswold District has an established record of windfall sites coming forward and a fair proportion of these have come forward consistently in minor settlements.	Explore this further. Explore this further. There is evidence of inspectors now accepting a windfall allowance, subject to demonstrating robust evidence that it would be delivered (e.g. south Worcestershire).

³ Dev. Strat. 7.8.

The SHLAA

36. The Strategic Housing Land Availability Assessment (SHLAA) was originally released in 2010 and was reviewed in 2012. The 2010 document rejected sites that could deliver less than 40 units (therefore discounting most sites in villages and smaller settlements). This resulted in the release of the **Local Plan Preferred Development Strategy** in 2013 which attracted over 2000 representations (Dev. Strat., 7.1). This document and consultation tested allocations for sustainable settlements where specific sites could be allocated to deliver the housing required for 2011-2031 (Dev. Strat, 7.5).
37. The Dev. Strat. evidence paper lists the key points raised in the consultation. These concerns have been echoed in consultations around OFC, the Concept Statement and stakeholder events undertaken by the agents of the South Chesterton landowner. It is therefore worth discussing them here. **Table 1** below reproduces a selection of the key points raised for information. The planning authority has not explained why the concerns are not sufficient to justify the strategic allocation at South Chesterton.
38. The Strat. Dev. evidence paper explains how the District total allocation of 7,500 dwellings was arrived at.
39. In paragraph 12.2, the Council acknowledges that it could not have met this requirement without the South Chesterton Strategic site. The document also acknowledges that the actual detailed delivery of the site, and proper planning and mitigation, might affect the actual housing numbers on the site. However, it is clear that the entire District five year housing land supply is entirely dependent upon the availability and deliverability of the South Chesterton site, particularly from the middle to end of the plan period.

The Vision for the District

40. A Vision is set out for the District in the evidence paper **Local Plan Reg. 18 consultation: Development Strategy and Site Allocations** (January 2015). The objectives for housing and population seeks to

Provide an adequate supply of quality housing, of appropriate types and tenures, to meet objectively assessed needs. (5.1.2.a)
41. Strategic policies are put forward and SP3 for land for new homes states:

To support and **strengthen communities and their towns and villages**, sufficient land will be made available to accommodate 7,500 dwellings across the District during the plan period (emphasis added).
42. The Town Council asks the question whether placing 83% of the new housing allocation in an area of 25% of the population can meet the objective of strengthening communities in towns and villages. This harkens back to the points raised in consultation for the preferred development strategy (Table 1). There is clear unease amongst respondents that the strategic allocation is putting too strong a focus on Cirencester, to the potential detriment of other areas.

Affordable housing

43. The proposal seeks to achieve up to 50% affordable housing in the strategic development. This would imply over 100 affordable units would be occupied every year for 11 years. Experience has shown that it has been difficult to achieve full occupancy at the Kingshill South development and that much of the affordable housing there is still outside the reach of many local people. The Town Council also questions whether sufficient evidence exists to suggest that this level of affordable housing is required in the Cirencester area and how much of affordable provision will be taken up by in-migrants from other areas such as Swindon or the North of the District. This would be inherently unsustainable because it would imply increased commuting to jobs from those areas.

44. The **Evidence Paper: To Inform Non-Strategic Housing and Employment Site Allocations – APPENDICES** (November 2014) sets out the local plan's strategic objectives. Objective D focuses on housing (146). The emphasis of this document appears to be at odds with the strategic allocation in that it emphasises the need to provide for local needs, particularly for affordable housing.

AONB

45. The section of the housing evidence paper, **wider policy objectives** (24) makes it very clear that the AONB is a significant constraint on the identification of housing land but also states that this constraint needs to be overcome to enable development to occur in all parts of the District. It is accepted that development will have to occur in the AONB, though the designation and its constraints must be "taken into consideration".
46. Site selection criteria were established to assess the long list (3 Methodology). All sites in the AONB are considered to be "red" or "amber". The map below shows the extent of the AONB. Only Cirencester, Fairford and Lechlade are outside the AONB and therefore not subject to this constraint (Figure 4).

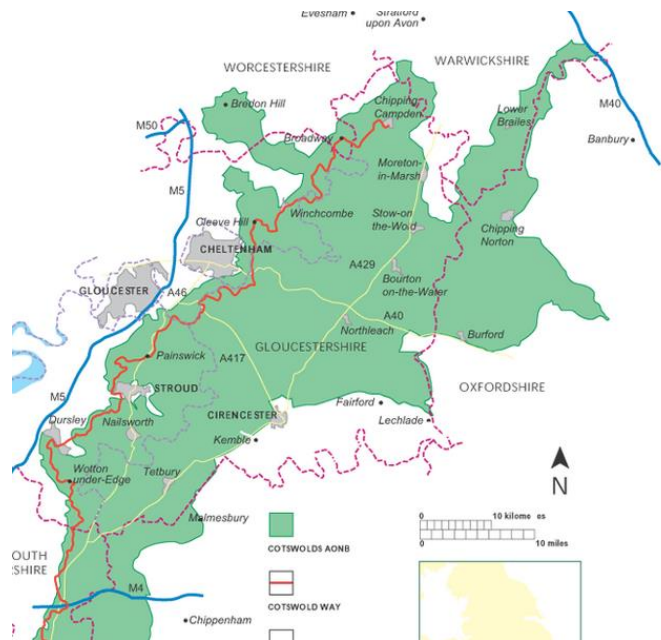


Figure 4: AONB in Cotswold district

47. The NPPF states

115. Great weight should be given to conserving landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

116. Planning permission should be refused for major development in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way
48. As set out above, the Planning Authority is requested to supply further information on the build-out of already permitted development and the likely delivery of housing at the South Chesterton site. If this should prove to be impossible to deliver as currently assumed, then in the absence of sufficient allocations elsewhere in the District, the case could be made that exceptional circumstances exist, requiring a reassessment of housing site development potential in AONB locations.
49. Regardless of whether the South Chesterton site delivers as many units as projected, the five year housing land supply in the second half of the plan period could still be compromised, because of the lack of identified sites in the proposed distribution elsewhere in the District. The prospect is of one site

delivering all of the District's housing allocation in the second half of the local plan period to 2031. It is questioned whether the allocation of so much housing at the southern edge of the District is fair for local communities. This can also be considered to be an exceptional circumstance.

50. In the event that exceptional circumstances can be proven, the assumptions underlying the SHLAA should be reviewed. In addition, the threshold of considering sites over 40 units should be lowered.
51. The principle of allowing housing development in the AONB has been established through the upheld appeals for housing refusals, mentioned above. The AONB also requires young people to work the land to maintain its value and beauty – these people will need affordable homes.

Recommendations:

52. In the event that exceptional circumstances can be proven, the assumptions underlying the SHLAA should be reviewed, particularly regarding AONB constraints. In addition, the threshold of considering sites over 40 units should be lowered.

Working to obtain the best outcome for Cirencester

53. The justification for putting forward a strategic development site in Cirencester is that it is more sustainable: infrastructure and services already exist in Cirencester that are more likely to have a successful outcome post-development than if significant levels of housing were to be located in smaller or more remote settlements. This is an established principle that is reflected in the current local plan (2001). The emphasis was previously to spread development around all the major settlements, though Cirencester was the primary settlement. However, this must be questioned in light of the argument above: Can Cirencester sustain growth at this scale and over such a short period of time?
54. The NPPF seeks to deliver a significant increase in housing allocation and now that the land at South Chesterton has been identified as potentially able to be delivered, it will be difficult to move away from this allocation (see section 6 of the NPPF).
55. As shown, Cirencester has 25% of the current population but 83% of the new housing allocation. The proportionality of the current allocation must be questioned as is its ability to meet the stated desire of other communities to also have housing growth, as set out in the 2010 consultation. In this regard, it can be concluded that the recent SHLAA exercise has failed to deliver housing for other settlements: this major allocation cannot be argued to meet the housing needs of communities in other parts of the District, particularly those north of the A40.
56. If the plan process were to stall, and a proposal were put forward on the South Chesterton site before a plan was adopted, it is possible that it would be permitted either by the planning authority or on appeal. Under the current local plan allocation process, the Town Council can engage with the planning authority and the developer to secure maximum benefits and protections for Cirencester. The Town Council's ability to influence the future development and mitigation will be stronger through the plan process than in response to a planning application where there is no adopted plan. It is therefore in the Town Council's interest to engage positively with the proposal, even if it does not agree with the allocation, in order to insure the best chances of securing maximum benefits and the most positive outcomes for the Town.
57. The Town Council agrees to work with the local planning authority to ensure that this new development has a positive impact on the town if it goes ahead. However, as this report will discuss below, the mitigation required to enable this to happen in a positive way, managing impacts caused, will be so significant, that it is unlikely that Cirencester can accommodate any further development within the plan period to 2031. The Town Council therefore puts down a clear marker that if the South Chesterton allocation were to proceed at the current proposed level of 2,350, no more housing land should be allocated in Cirencester during the plan period.

Recommendations:

58. The Town Council will work proactively and collaboratively with the local planning authority and developer of South Chesterton to seek the best outcomes for Cirencester to ensure that a strategic development in this location makes a positive impact on the town and surrounding villages.
59. The Town Council will strongly resist any further housing land allocations in or affecting Cirencester in the plan period up to 2031.

Summary of points on the development strategy

The Town Council is concerned about the deliverability and fairness of the development strategy:

60. The allocation to put 83% of the new housing in Cirencester is disproportionate and possibly unsustainable – Cirencester has already had two significant urban extensions and to accept up to a third increase in the recently expanded population is a cause for concern.
61. The permitted but unbuilt schemes included in the allocation are not certain since they were originally refused by the local planning authority and only permitted on appeal. Should any of these schemes not come forward, the five year housing land supply could not be assured.
62. The South Chesterton site is relied upon to contribute a substantial proportion of the allocation during the middle and latter part of the plan period. Should it fail to deliver at the rate of 214 units per year for every year, the five year housing land supply could not be assured.
63. The rate of 214 new houses built every year for 11 years is of concern because of
 - Construction impacts
 - Whether it would be possible to occupy this many units in such a short period of time, in order to maintain the momentum required.
64. Whether it would be possible to occupy up to 107 (50%) of units for affordable housing every year for 11 years, given the difficulties in the Kingshill South development to achieve full occupancy
65. Whether it would be possible for the proposed development to sustain the amount of necessary off-site mitigation (set out below) that would be required to offset the negative impacts that the development would cause.
66. Whether the significant reliance on Cirencester in the latter part of the plan period is fair and sustainable for other parts of the District, meets local need in other parts of the District, and whether it is reasonable for the local planning authority to assume that people can move from the north of the District to Cirencester to take up the housing opportunity
67. Exceptional circumstances may exist that justify a reassessment of the SHLAA in terms of AONB constraints and the lower threshold of site search and if so, the SHLAA should be reviewed immediately to identify a more fair, equitable and realistic allocation of sites across the District

The Town Council objects to the size of the proposed South Chesterton allocation, on the basis of the points made above, but will continue to engage positively with the local planning authority in order to seek the best chances of securing maximum benefits and the most positive outcomes for the Town.

Should the allocation remain significant, the Town Council will strongly oppose any further housing allocation in Cirencester in the plan period.

Economic development

68. Cirencester is described as the dominant urban centre in the District with around 25% of the population and 30% of the jobs (Ref. 18, 3.12). However, other towns perform the roles of service centres, each servicing a "significant catchment of smaller settlements" (3.14). 13.3% of people work from home in the Cotswolds (though the document is silent on what the percentage this is in Cirencester - it is implied that this figure may be focused more on rural locations).

Employment Land

69. The Reg. 18 document concludes that across the District, 20-28 ha. of employment land are required for B class uses. The economic development policy (SP2) (Table 2) seeks to encourage sustainable growth by reinforcing existing economic functions. The policy is general and in line with the NPPF and is supported by the Town Council in principle, but with caveats.

Table 2: SP2 Economic Development

The Council will support sustainable economic growth and improvement in its economic performance, whilst protecting and enhancing the attractive environment of the District, through reinforcing the economic functions of settlements by:

- a) making provision to meet the objectively assessed employment and economic needs of the District through allocating about 28 hectares of B class employment land
- b) ensuring a degree of flexibility and adaptability to changing economic circumstances in its assessment of proposals that come forward.
- c) seeking to sustain and support the resilience of the local economy and recognise the value of smaller businesses, as well as larger employers.
- d) encouraging employment opportunities linked to Further and Higher Education institutions and research establishments.
- e) enabling a prosperous and sustainable tourism economy, promoting a successful visitor economy which benefits

70. The document notes that there has been an overall decline in B2 class space (general industrial). Recent employment land allocations have been lost to housing developments in Cirencester (land at Kingshill was set aside for employment land but this was lost to housing uses in a subsequent planning application.) It is important for the future viability of Cirencester, particularly in the face of significant housing growth, that all employment land is safeguarded.
71. The Kingshill scheme allocated 1 ha. of land for employment as part of that development. No promotion of the site was undertaken and the land was recently lost to housing. 4 out of 5 other employment sites in Cirencester also allocated in the last Local Plan were developed for non-B- class uses.
72. The Town Council questions where the incoming population will work. Cirencester is acknowledged by all local stakeholders to be outside the area of interest of the Gloucestershire LEP. If the District Council does not take more active steps to safeguard employment land, market it, and ensure that jobs are created, the South Chesterton development will result in significant out-commuting because local people will have no other choice. The section of this report on transport shows in Figure 7 that currently 18% of Chesterton residents commute to Swindon and Wiltshire. This will only increase if

insufficient jobs are available locally. It may be beneficial for Cirencester to have "extra" provision given the high levels of out-commuting currently occurring, and other pressures that have come to light during the OFC exercises.

73. The proposal is to allocate 9.10 ha of B1 land in the proposed South Chesterton development. This equates to around 32% of the District provision (currently, Cirencester has 30% of the jobs). This is a reasonable and fair allocation which the Town Council supports. However, if the allocation is for 83% of new housing, it would be prudent for the employment allocation to be equivalent. This would imply that another 10 ha of employment land might be required.
74. There is significant evidence from the OFC consultations that Cirencester's current B2-B8 industrial areas (Love Lane, Whiteway and other small pockets of development) are crowded and unable to expand further. The planning authority has consistently resisted the expansion of Love Lane towards Siddington in the interest of keeping the settlements separate.
75. The SHLAA considered a site adjacent to Love Lane (C 84B/C) but despite community support, has not allocated it as industrial land. Unfortunately, the Officer Analysis in the Evidence Paper to inform non-strategic housing and employment site allocations is silent on the value of this site. Cirencester Town Council seeks to have this site allocated as an employment site to enable Love Lane to expand.
76. The main sectors identified for growth are tourism, elderly care and relating to existing academic institutions. Care and tourism tend to create low skill and low paid jobs and though necessary, should not be considered the main focus of growth, which should be for high quality, high paid jobs.
77. The stakeholder group on economic development endorsed this view and the Cirencester College offers courses in these sectors. The RAU was not represented in that session but work for the review of OFC indicated that there are plans for growth and expansion, and an assumption that the employment land at the South Chesterton development would be an asset offering spin-off businesses to locate in the vicinity of the university and college.
78. The NPPF states that

Planning policies 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. Land allocations should be regularly reviewed. (22)
79. The current local plan does not define what "no reasonable prospect of a site being used" is and this has resulted in the transfer of land from industrial designations to housing land. Planning policies will need to actively protect employment land wherever possible. A definition of how it can be proven that employment land is not needed should be included in the development management policies.

Recommendations:

80. The Town Council endorses SP2 but considers that:
 - Stronger steps need to be taken to safeguard existing employment land (planning policies and the use of appropriate conditions safeguarding employment land for a reasonable period)
 - That the amount of employment land should be increased to match the scale of the proposed allocation (i.e. another 10 ha may be required)
 - The District Council needs to more actively work with stakeholders to create high skill, high value jobs
 - The planning authority should provide evidence how South Chesterton will be served by local jobs to avoid out-commuting to Swindon and Wiltshire.
 - The District Council designates site C 84B/C as employment land.

Retail

81. A retail study was commissioned by Peter Brett Associates which considered Cirencester within the context of the wider economy. The report found that there is a general trend for retailers to prefer larger units and there is a polarisation between budget retailers and high-end retailers. The report comments that Cirencester could be unattractive to some retailers who seek large format units which are impossible to accommodate within Cirencester's old and often Grade II listed buildings. However, Cirencester's historic character is also seen as an asset because these buildings create an attractive environment. There is a significant level of retail "leakage" of shopping trips to other centres outside the District: 60% of expenditure is leaked to Cheltenham (clothing and beauty) and Swindon (comparison good, large electrical goods).
82. The report identifies unmet demand and suggests a number of town centre sites that might be suitable for development. The sites and relevant excerpts from the report are set out in [Table 3](#) on the following page. Many of the sites have been discussed in OFC and Concept statement stakeholder events as suitable for redevelopment. There appears to be some support for development on these sites, though this would need to be fully tested in consultation. Work would need to be done to integrate these sites with the Market Place Redevelopment Scheme.
83. A major criticism of the Reg. 18 document is that the development sites discussed in the retail study are currently Cotswold District car parks. These sites offer the only easily developable "brownfield" opportunities in the town centre. Map 1 of the Reg. 18 documents shows the most important sites but does not commit to them because the **Cotswold Parking Study** is being undertaken. This is a document of fundamental importance to the Reg. 18 strategic site consideration because it will make recommendations on parking as well as the ability of the town centre to grow, modernise and meet the needs of the proposed South Chesterton development's residents. This stage of the local plan process is to identify key sites but this has not been done for these key Cirencester development sites. It will therefore be difficult for the Town Council to come to a reasoned and sensible conclusion about the document in this regard. The District Council should publish the Cotswold Parking Study as a matter of urgency and should undertake further Reg. 18 consultation on parking and development sites in Cirencester Town Centre.
84. A recommendation for the review of OFC, as presented to the Town Council on 9 December 2016 was that a design code for the town centre would be beneficial. Further work with the Urban Spaces and Economic Development meetings in support of this document have identified a central area that would include the sites proposed by Peter Brett Associates. It would be appropriate for a design code to consider the findings of this report in detail with a view to attracting suitable retail to support the growth of the town centre retail economy. In order to be most effective the design code should be adopted by the Local Planning Authority and should be prepared collaboratively between the Town and District Councils, taking account of the views of the local community and other stakeholders.

Recommendations:

85. The Town Council generally endorses the conclusions in the Retail Study.
86. The District Council should publish the Cotswold Parking Study as a matter of urgency and should undertake further Reg. 18 consultation on parking and development sites in Cirencester Town Centre.

Table 3: Relevant evidence on economic development

Excerpts from Cotswold Economy Study Part 3 Volume 1 Retail Study, October 2012 Peter Brett Associates LLP

6.4.12 While this aspect of the qualitative assessment can be highly subjective, the key research finding for Cirencester town centre is that the market town style retail premises are holding some retailers back – they do not meet the requirements for new retailers in the town, and existing retailers can find store configurations and the small sales areas difficult. Nonetheless, the wide catchment area and tourism expenditure indicates that the centre does, by and large, stand up to consumer expectations. Retention of expenditure from residents across the study catchment is generally considered to be strong. However, it would appear that Cirencester is losing some of its market share to a wider variety of shopping destinations including the internet and competitor cities and towns.

7.5.3 Under Strategy 4, which earmarks concentrated retail provision in Cirencester, there will be a requirement to deliver a significant proportion of Cotswold District's floorspace requirement. Whilst the focus of development should be the town centre, there is a need to test whether there are suitable sites and whether these sites meet the anticipated needs and fulfil existing deficiencies in the retail offer as shown in the survey.

Site Development potential (Table 7.5)

Brewery Car Park area including Memorial Hospital site	The Brewery car park is a popular and well used car park. However, it is also the most centrally located in terms of the shopping circuit and offers the best opportunity for a comparison retail led scheme, especially in conjunction with the neighbouring Tesco store. As car parking is considered a major issue, development of this site should be considered with the Sheep Street Island site as this could be better utilised as a location for displaced car parking. Conclusion – represents good opportunity to provide new retail floorspace in the centre.
Sheep Street Island	Whilst this site may have the potential for retail development, it is not considered that it is best located for town centre comparison uses as it is disjointed from the retail circuit. The historic buildings on site will limit opportunities for either supermarket or bulky goods type floorspace. Therefore, it is considered that, in conjunction with the Brewery Car Park area, improving the parking provision on the site may be the most suitable option. Conclusion – not suitable for retail uses but could be utilised for intensification of parking facilities.
The Dyer Street area and Waterloo Car Park	The northern Dyer Street frontage and the large service and car parking area to the rear offer the potential to redevelop what is currently a low quality property offer. However, in order to be attractive to the market and to offer the level of floorspace required, the site would need to be considered with the Waterloo Car Park. Conclusion – would not provide significant retail floorspace gains; however, redevelopment desirable to improve property offer. Car park area could be intensified in terms of parking spaces.
Forum Car Park and Police Station area	This site does offer one of the best opportunities to provide significant levels of comparison retail floorspace in the town centre. Potentially, it could join the two shopping areas of Dyer Street and Cricklade Street; However, this will require much improved linkages and potential rerouting of road networks. It will also require the relocation of much of the car parking as it is unlikely that site redevelopment could include significant levels of parking space in addition to new retail floorspace and servicing areas. Conclusion – potentially the best site for comparison retail but will require comprehensive redevelopment and improved linkage to surrounding areas.
New centre as part of urban extension	If the council pursues an urban extension for Cirencester, it may be an option to include a new local or District centre to serve both the new residents and neighbouring residential or commercial areas. A planned centre with a range of services and facilities in addition to any retail floorspace would be preferable to a single use out of centre retail unit. The centre should be large enough to provide sufficient critical mass to be attractive to the market but should complement rather than compete with the town centre. This should not replace town centre schemes but provide for local needs. Conclusion

	– identification of a new centre provides the opportunity to properly plan for growth, rather than being led by the market.
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Out of centre retail development

87. Consultation on OFC and the Concept Statement have clearly demonstrated that the ring road is causing severe severance between the town centre and out of centre. This severance is apparent in terms of pedestrian permeability and parking congestion. As the section on retail above has shown, there is a shortage of large format development opportunities in the town centre which will lead to pressure for new development to occur outside the ring road. Local people have often expressed the concern that many people who drive past Cirencester on the ring road are unaware of the town centre and do not come into it to shop.
88. There has been significant development interest from commercial developers outside the ring road since the recession has eased in recent years and Cirencester has seen many existing sites redeveloped for retail uses that provide free parking. This can have a direct impact upon the town centre where parking is difficult and may become more so. At present, out of centre development does not seem to be having a major impact on the viability of the town centre but this is not likely to be the case if significantly more out of centre non-food retail is permitted.
89. The planning authority has a questionable record of protecting in-town uses from out of centre competition. The strategy has relied upon a "flexible approach" towards development. Great care will need to be taken as CDC has not defined what its flexible approach is. The Vygon site's development was justified by officers as meeting a bulky goods requirement that would not compete with the town centre uses. S. 73 planning applications have altered the scheme which now competes directly with the town centre.
90. The current local plan proposals are silent on this subject and the next phase of the plan's development which considers detailed development management policies must take a clear stance on issues such as:
- The impact of out of centre retail on the town centre
 - A means of protecting the original planning decision, with its intention to protect town centre uses from pressure to change the retail offer through subsequent S 73 applications to modify conditions limiting retail use.
 - A clear policy on where out of centre retail development should be located to stop strip development from occurring.
 - Clear policies that set out how any negative impacts arising from out of centre development will offset impacts on the town centre such as:
 - Contributions to town centre street scene
 - Subsidised customer parking for town centre car parks
 - Information to make out of centre patrons aware of the town centre and what it has to offer
 - Contribution toward signage that encourages out of centre patrons to visit the town centre.

Recommendations:

91. The Town Council requests that the local plan considers how to actively manage the relationship and pressures between in centre and out of centre retail development, with clear policies that will ensure that both can coexist to the benefit of Cirencester as a whole.

- Ensuring that out of centre uses don't negatively impact the town centre by defining specific and active measures to maintain balance between in and out of centre retail activities
- Defining it's "flexible approach" to granting permission for retail schemes

Town Centre redevelopment opportunities (brownfield land)

92. The NPPF encourages the reuse of land. In Cirencester, where there is little opportunity to develop new sites and most of the existing buildings are listed and the town centre is a scheduled ancient monument, further restricting redevelopment. There are few opportunities to develop contemporary land uses in the town centre.
93. There are a few "zones" in the town centre where consultations on OFC and the Concept Statement have shown public support for future redevelopment. These zones are currently in use and there has been no suggestion of their redevelopment, but as the town changes and its population grows, pressure to redevelop these sites may arise.
94. These areas have been subject to redevelopment already and the buildings are generally post-war and not subject to listing constraints. They are also, in some cases, in poor condition and in need of upgrading.
95. The most prominent zones that might become attractive for redevelopment are:
- Memorial Hospital/Sheep Street Car Park/Island Site
 - Waitrose/EHS Brann/Sheep Street/A429
 - Forum Car Park/Police Station
 - Catalpa Square/East Dyer Street/Argos/Waterloo Car Park
96. These zones should be positively planned for and specific development policies are required to ensure that in the event that proposals come forward, a robust policy framework is in place to ensure that the new development contributes positively to the form and function of the town centre. This would best be done through the preparation of a supplementary planning document for the town centre. A "vision" for these zones should be agreed that provides prospective developers with some certainty about what would be appropriate and supported. This should be integrated with the design code.

Recommendations:

97. The Town Council will work with the Planning Authority, taking account of the views of the local community and other stakeholders to make proposals how to maximise the development potential of key strategic sites or zones to improve their attractiveness to developers in the town centre.
98. That a supplementary planning document for the town centre be prepared that considers, amongst other things, how to manage development in key zones.

Healthcare provision and wellbeing

99. Cirencester is already experiencing pressure for GP surgery space. The IDP notes that two surgeries in the town centre were seeking to expand and amalgamate in 2013 (this did not occur) and the Town Council is aware of another surgery seeking an expansion opportunity. Economies of scale can be achieved when surgeries are larger, and branch surgeries can be relatively much more expensive to operate. Land in the town centre has proven difficult to secure, for all the reasons listed elsewhere in this document, but the development timescales for the South Chesterton development are too long to be able to meet the current demand. When that development comes on stream, the need for additional primary healthcare development will become even more important.
100. The GPs we have consulted have indicated that they believe that the estimated numbers of GP places are significantly under-estimated in the IDP. According to the patient to GP ratios in that document, every surgery in Cirencester is vastly over-subscribed. This aspect of the IDP needs serious reconsideration in the light of local experience and it is suggested that the District Council liaise directly with local doctors to understand their needs better. Similar exercises should be taken for dentists and opticians (who were not included in the discussions for this document).
101. As the South Chesterton development comes on stream, pressure will be put onto Cirencester Hospital and acute hospital provision and beds in Cheltenham and Swindon. The local plan should take these pressures into account.
102. Cirencester Hospital continues to meet community needs and will shortly be opening the Stratton Health Marketplace which will be a signposting service. Other GPs in the town are also interested in developing education and wellbeing services to help their patients avoid medication by leading healthier lifestyles.
103. The Reg. 18 document and supporting evidence highlights the aging profile of Cirencester's population. This demographic trend must be actively planned for. Planning for the elderly in development management policies and specifically at the South Chesterton development should consider putting development in place that provides flexible accommodation for aging people.
- New housing should be provided for the aging and elderly that is designed for their changing needs with features such as wider doorways, warmth, light, ground floor accommodation, near to bus routes, etc.
 - Special care facilities will be required to manage dementia, end-of-life care, access to healthcare.
 - Development principles should specifically address the needs of the elderly such as provision of bus stops, community transport (including drop off places in town and at other destinations), and overcoming loneliness by providing community activities for the elderly, etc.
104. Opportunities for "wellbeing" activities should be offered to all sectors of the community in all parts of the town. These include opportunities to live a healthy lifestyle, learning about how to be healthier, opportunities to meet and be active together, healthy eating with education about growing food, a healthy environment with opportunities to build healthy activities into everyday life, and a clean environment. New community infrastructure should have regard to this.
105. The South Chesterton site should provide, as a minimum:
- Primary care
 - Mental health services
 - Opticians
 - Dentists
 - Community services and social care
 - Wellbeing education and opportunities
 - Housing designed for the elderly (perhaps as a proportion of affordable housing)
 - Flexible housing that can be modified to meet the changing needs of aging inhabitants

Recommendations:

106. The Reg. 18 consultation in summer 2015 should contain proposals on provision for healthcare and wellbeing for all parts of Cirencester.

107. The South Chesterton development should make specific provision for health and wellbeing for all sectors of the population, and should contain a proportion of housing designed for the elderly.

Strategic Vision for South Chesterton

108. The detailed design of the development will evolve through discussions led by the land owner. John Thompson Partners have already done significant public consultation work in Cirencester and the details of the evolving master plan have been made available on their website <http://www.jtp.co.uk/community-planning-projects/chesterton-farm/>. Their master planning work is led by proposals put forward in the Reg. 18 documents.

109. The proposals are general in nature at this point, and do not require specific comment. Detailed responses to the vision as this relates to off-site impacts, is set out in this report and will not be repeated here.

110. However, taking account of OFC and Reg. 18 consultations, the planning authority is pointed to a number of areas where the Vision has not been as comprehensive as it should have been and where more consideration or detail is required in the summer 2015 Reg. 18 consultation on the development management policies.

- a) The new development should take dedicated measures to encourage intra-community cohesion, integration and access with the existing Chesterton community.
- b) The new development should not adversely impact upon the existing Chesterton community or its existing infrastructure (road, educational, health/wellbeing, social).
- c) Internal road design must facilitate modal choice to meet the objectives of the Town Council's hierarchy of transport modes, for instance by ensuring the pavements are sufficiently wide for all road users to share space, and appropriate location of convenient and safe bus stops and cycling infrastructure.
- d) Consideration should be given to on-site waste management and renewable energy generation to move towards energy self-sufficiency.
- e) Planning permission should not be granted unless the availability of robust drainage and sewerage facilities can be proven, with a clear delivery mechanism and timetable, to ensure that the infrastructure is in place before development commences. In doing this, the planning authority should closely interrogate statutory undertakers to be convinced that sufficient capacity exists or can be created.
- f) Define the term "future proof" and how that will benefit Cirencester and the development.
- g) More work is required to determine the likely demographic of the incoming population. For instance, how are the elderly taken into account, and what provision is being made for the wellbeing of an aging population?

- h) Mechanisms are required to ensure ongoing provision of revenue expenditure for mitigation as footpaths, cycle ways, other infrastructure, bus routes, etc. is in place and that appropriate long term management agreements are secured.
- i) The Council should take steps to ensure that allocated employment land is actually developed to benefit the local population (including the incoming population) to discourage journeys to work outside the area.
- j) The Council should take steps to ensure that the housing provided, particularly the affordable housing, meets local needs (i.e. for the communities in and around Cirencester). Specific mechanisms should be employed by the Council to do this.
- k) More information is required, perhaps from the forthcoming Parking Strategy, on an appropriate level of financial contribution, with recommendations how would this be levied, for decked parking (if this should proceed) as part of the development.
- l) There is a shortage of nursery places generally in Cirencester, and the new development should seek to be at least self-sufficient in terms of nursery provision.

Recommendations:

111. The Town Council seeks clarification on the detail of the Vision for South Chesterton, as set out above.

Education provision near South Chesterton

- 112. Cirencester is lucky to have excellent quality primary, secondary and university education establishments. Cirencester College, Deer Park and the Royal Agricultural University all have outstanding reputations and plans for their own development. This can largely be accommodated on their own land, but as discussion occur between the planning authority, the town council, the institutions and the agents for the South Chesterton development, linkages, blockages and synergies are being identified.
- 113. Deer Park and Cirencester College are located on adjoining sites and can therefore work together to accommodate development. Their land is surrounded by the South Chesterton land owners' land and they are therefore constrained in what they can achieve.
- 114. The Royal Agricultural University is preparing its own master plan and intends to expand its offering and size. It is also surrounded by land owned by the South Chesterton land owner.
- 115. The Reg. 18 document suggests that education related employment will grow, traffic from the three institutions is currently causing congestion on the routes and roundabouts that will be affected by the proposed South Chesterton Development. Therefore, there has been, and will continue to be, many discussions about the future of the four sites.
- 116. Given the linkages and synergies, it may be time to consider how these institutions and the new development fit together. It may be appropriate to consider the area not as three schools but one campus. If this were to occur, development opportunities could be maximised and costs probably better managed.
- 117. Key planning issues would be:
 - Parking and the relationship to the town centre (off site)
 - Improved traffic and movement on-site (walking, cycling, bus) across all the sites.

CTC response to Reg. 18 consultation

February 2015

- Student accommodation
 - There is insufficient student accommodation at the RAU
 - Students fill affordable homes across Cirencester, preventing local families from occupying them
 - Students can cause unwelcome disruption to communities and they are not always popular neighbours

Recommendations:

118. The Reg. 18 consultation in summer 2015 should explore the idea to create a Corinium Campus.

Travel

Existing commuting patterns from Chesterton

2011 journey to work patterns

119. The South Chesterton Development is proposed to be built at the edge of the existing Chesterton ward. The existing Chesterton population has many of the same characteristics as that which is proposed: a mix of housing types with a large proportion of affordable housing. It is therefore reasonable to use the existing Chesterton community as a proxy for what might occur under the proposed development.
120. Interrogation of the 2011 census data on journey to work, using the datashine.org website⁴ illustrates current journey to work behaviour in Chesterton. This shows the patterns that can be expected in future development at South Chesterton.
121. In 2011, 50% of Chesterton residents worked in Cirencester town centre, and 18% in Swindon and Wiltshire (Figure 5).
122. Most people travel to work from Chesterton into the town centre by car as drivers (45%) or passengers (9%): 37% walk and 6% arrive on bicycles (Figure 6). Though there is currently a bus service serving Chesterton, only 2% use it for their journey to work.
123. The South Chesterton proposal is about a mile farther away from the town centre⁵. It is reasonable to expect that more people who work in Cirencester town centre will seek to arrive by car, fewer will choose to walk or cycle. This therefore poses a significant challenge for the development.
124. Anecdotal evidence from the Town Council's stakeholder consultation have indicated that home workers tend to have a dispersed clientele to whom car journeys are made. These journeys tend to be off-peak. The Reg. 18 document implies that 13% of people will work from home. Home workers bring their own transport impacts: there may be increased pressure to use Kemble station for commuting to London, and increased off-peak travel.

⁴ The website shows journey to work data for grouped census points that do not conform to data areas used in the plan. An example is that Cirencester is represented in 3 areas rather than the existing 5 wards. The site is operated by University College London CASA.

⁵ It is around 0.8 miles from Chesterton Lane to the end of the Farm Track onto Chesterton Farm.

Figure 5: journey to work from Chesterton

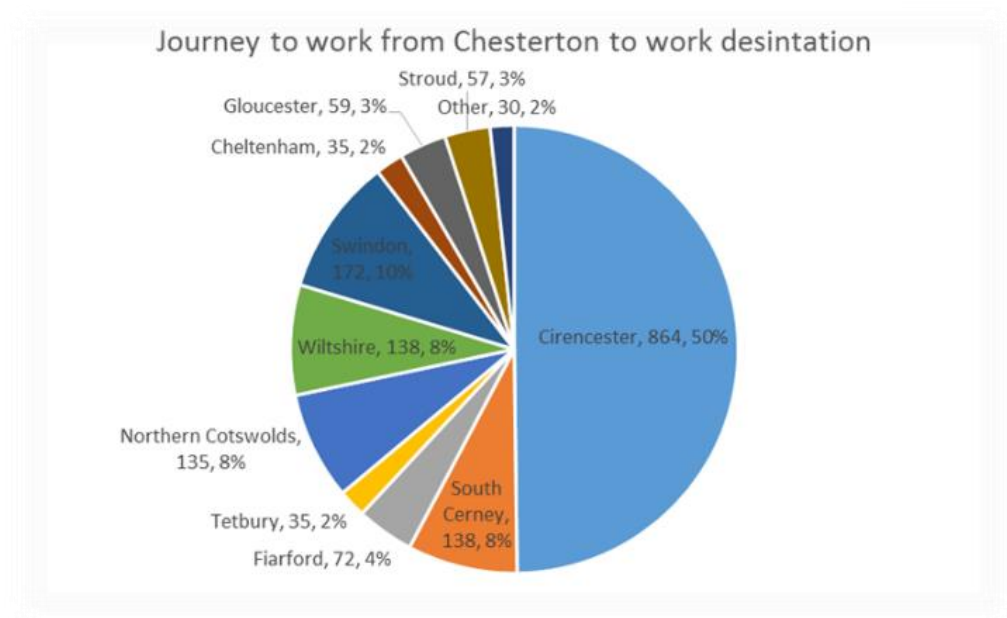
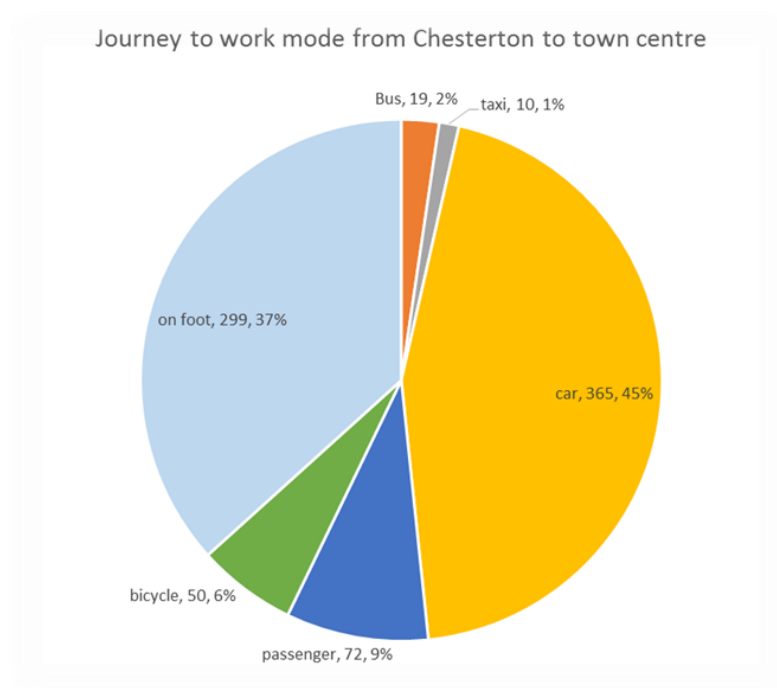


Figure 6: journey to work mode from Chesterton to the town centre



125. The current proposal is for the South Chesterton development to have two entrances onto the Tetbury Road (A429) and perhaps another onto Somerford Road/Spratsgate Lane. Journey to work options will therefore be to leave the development and turn:

126. Options for leaving the South Chesterton Site:

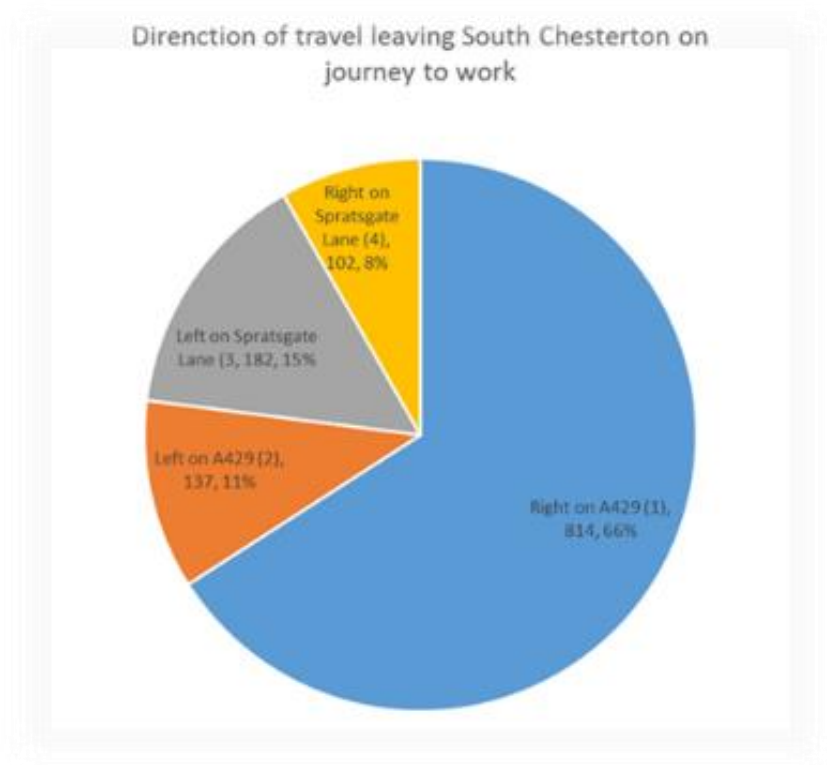
1. Right onto the A429 towards the town centre, and the A417 (north or south) or on minor roads north, east or south
2. Left onto the A429 towards Tetbury and the west and south toward Wiltshire or Kemble station
3. Left on Spratsgate lane towards the town centre
4. Right on Spratsgate lane to the Spine Road for Swindon or Wiltshire

127. Table 4 considers how South Chesterton residents might journey to work by car, looking at work destinations and estimates the direction of travel from each of the four proposed exit options. This shows that most traffic will travel on the A429/A419 onto the ring road. This is illustrated in [Figure 7](#).

Table 4: assumed driver behaviour on journey to work by car

Current journey to work destination for Chesterton	Current number travelling out	Assumed direction of travel	Right on A429 (1)	Left on A429 (2)	Left on Spratsgate Lane (3)	Right on Spratsgate Lane (4)
Cirencester (by car)	365	1,3	182		182	
South Cerney	138	1,2,4	46	46		46
Fiarford	72	1	72			
Tetbury	35	2		35		
Northern Cotswolds	135	1	135			
Wiltshire	138	1,2,4	46	46		46
Swindon	172	1	172			
Cheltenham	35	1	35			
Gloucester	59	1	59			
Stroud	57	1	57			
Other	30	1,2,4	10	10		10
total		1236	814	137	182	102

Figure 5: presumed direction of travel to work from south Chesterton





128. Morning peak traffic on the A249 eastbound (option 1) is already very congested, though this will need to be tested in a traffic model. These photos were taken of traffic from the bridge near the Waitrose Roundabout. On 11 December in morning peak (Figure 6), there is clear evidence of congestion south west bound arising from congestion at the South Chesterton Roundabout. This is caused by traffic leaving Chesterton Lane to join the A429 converging at the roundabout at school time and commuters arriving from Stroud and Tetbury.

129. A similar pattern was observed on 18 December 2014 (Figure 7), also from the bridge. The photo below illustrates congestion at the Waitrose roundabout.

Figure 6: 8.43 11 December 2014



Figure 7: 8.24, 18 December 2014

Implications for sustainable transport between Chesterton and the town centre

130. There are already significant and demonstrable levels of congestion arising near Chesterton which can only be exacerbated by the introduction of 2,350 new houses. The Reg. 18 consultation document recognises the need to enhance sustainable transport provision for Cirencester generally and arising from the South Chesterton proposal in particular, and seeks to provide:

A comprehensive package of transport measures to mitigate the impact of the proposed development on the existing road network and to ensure that the site is well connected to the town and surrounding areas, maximising the opportunities for sustainable travel with the early provision of key transport infrastructure requirements. (7, the strategy)

131. The Town Council is concerned about the existing travel and parking congestion experienced in and around Cirencester and the likely impact of the proposed development. The Town Council will seek a comprehensive mitigation package to overcome any adverse impacts that the proposal may cause to arise.

132. Unless and until the appropriate sustainable transport infrastructure is in place, no development should occur on the South Chesterton site. Without the key sustainable transport infrastructure for cycling, walking and buses, the proposed development cannot be considered "sustainable" because of the extreme car and parking pressure it will put onto the already congested town centre and car infrastructure.

Recommendations:

133. Pre-commencement conditions should be used and enforced on the South Chesterton site that ensures that off-site sustainable transport mitigation is in place before any additional traffic is generated. Specific recommendations are required for the full Reg. 18 local plan consultation in summer 2015.

Cycling

134. The evidence above shows that cycling to work is not a well-used option (in Chesterton, currently only 6% of people cycle into jobs into the town centre). The Reg. 18 proposals set out a clear aspiration to increase this modal choice, though no indication of the target level of cycle use is given.

135. Local stakeholder comments have indicated that in order for cycling to improve, including from the proposed South Chesterton development, significant infrastructure improvements will be required. The current cycling experience is characterised as difficult, with inconsistently marked cycle lanes, lack of cycle lanes, conflict with other road users, no place to lock a bike, hills, etc. If cycling is to become a transport mode of choice, the cycling experience must be improved. Stakeholder views indicate that improvements are needed in terms of:

- Segregation between cars and pedestrians and significantly improved cycle lanes
 - Tetbury Road
 - Chesterton Lane
 - Cotswold Avenue
 - Brooke Road/Bathurst Road
 - Between Chesterton South and the Amphitheatre complex
 - Somerford Road
 - Stratton to the town centre
 - Linked to Water Park, and surrounding countryside
 - Specific development of the disused railway line to facilitate cycling to Kemble
 - Widening and improving the Churn link
 - Open Air pool to the Texaco garage
 - Texaco Garage/Jack Gardner/Abbey Grounds/City Bank/Beeches

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- City Bank/Watermoor/Underpass/Chesterton
- Improving major junctions to make them cycle and pedestrian safe:
 - Chesterton Roundabout
 - Waitrose Roundabout
 - Watermoor Roundabout
 - Kingshill South Roundabout
 - Beeches/London Road Roundabout
- Cycle storage is required at key destinations:
 - RAU
 - Deer Park/Cirencester College
 - Kingshill
 - Entrance to Abbey Grounds
 - Brewery Court
 - Town Centre Improvement Scheme
 - Forum Car Park area/Bus station
 - Beeches car park/Bus stop
 - Catalpa Square
 - Kemble station

136. Management plans and funding should be put in place, secured by bond, to ensure that these facilities are maintained into the long term future. Contractual agreements are required to ensure that overall responsibility for maintenance is accepted and carried out.

137. Significant development should make a contribution towards innovative schemes such as short term bike rentals ("Boris Bikes") to encourage casual use of sustainable transport. A recent trial of a similar scheme in Cheltenham was unsuccessful and if this is to be pursued, it is strongly recommended that there is a small trial to prove the concept.

138. Cycle routes outside of Cirencester need to be improved and upgraded if a wider network is put in place for the incoming residents:

- Sustrans routes can be difficult to find and negotiate in places and need improvement
- Quite Lanes provide excellent cycling infrastructure outside Cirencester but routes to them (for instance from Love Lane) are confusing and difficult to negotiate

Recommendations:

139. The local plan should contain specific policies to identify cycle routes and infrastructure improvements with clear delivery mechanisms through development management policies, in particular S106 provisions that will ensure that suitable mitigation is in place before significant traffic-generating development commences.

140. Long term management of the schemes is required and should be assured long term though funding mechanisms, agreements, and security.

Walking

141. The evidence above shows that walking to work is a reasonably well used option to get into town from Chesterton (37% journey to work from Chesterton). However, stakeholders were very clear that they did not agree with the presumption in the plan that increasing walking from the South Chesterton site would be easy or likely. The proposal site is far from the town centre and stakeholders did not believe that walking would be a preferred modal choice.
142. Walking routes between existing Chesterton neighbourhoods and the town centre will be affected by the new development as car congestion increases. It will therefore be necessary to consider the impact of the new development on existing walking routes and protect and strengthen these as part of the development mitigation achieved through S 106. In particular, the new development should be required to fund improvements to existing routes set out below. This should be included as an itemised list in the Infrastructure Delivery Plan. Improvements should be of sufficient quality that they will encourage South Chesterton residents to choose to walk rather than use their cars to enter the town centre. Provision should be made to offset ongoing maintenance costs. Management might be achieved in partnership with the Town Council who already have land management programmes in place.
143. The footpath on the Tetbury Road fronting the RAU. This should link safely to the footpath between the Chesterton roundabout and the Waitrose Roundabout on the northeast side of the Tetbury Road. Significant pedestrian improvements are required on all frontages to RAU, Deer Park and Cirencester College, preferably at grade. There is evidence that school children find the environment in the underpass to be threatening and this should be improved. It might be desirable to create a link from the point from the South Chesterton Development where it crosses Tetbury Road across RAU land to create a short route into Deer Park and the College.
144. Chesterton Farm Track linking South Chesterton and Chesterton Lane. This will be a key route between South Chesterton and the Town Centre.
145. A new track will be required between Chesterton Farm Track and the hospital car parks, facilitating a safe and pleasant route to the footbridge over the A 429 near the hospital. This will be a key route between South Chesterton and the Town Centre. It will also improve access to the Amphitheatre, therefore in support of the plan's tourism objectives. Longer term, it would be highly desirable to create a new footbridge over the A419 linking the Amphitheatre with the town centre, preferably linking to Querns Lane.
146. Chesterton Lane is heavily used by hundreds of school children and parents with prams during school peaks. The pavements are narrow and cars park along the roadway which causes drivers to become frustrated and careless. Mobility scooters and pram-pushers cannot use significant sections of the pavements. The links to the well-used local shops on Chesterton Lane are difficult to negotiate safely in places. There is conflict between cars, delivery vehicles, buses and pedestrians. Stakeholders feel strongly that this route will be adversely affected by the new development as car usage increases. This must therefore be a consideration for S 106 highways improvements.
147. Somerford Road will be a key pedestrian and cycling route between South Chesterton and the town centre. The junction at Chesterton Lane is confusing for cars and very difficult for pedestrians, particularly children and parents with prams, to negotiate safely. It is near Chesterton Primary school and the "Whirly Path" and some improvements will be required here. This is also the least steep cycle route from the town centre into Chesterton and therefore will become an important cycle route to the new development.
148. The current route between Chesterton Park and the town centre requires pedestrians to use the footbridge. The footbridge will also be the egress point from the Amphitheatre complex. There are currently no direct routes (following desire lines) between the foot of the bridge and the town centre that enable pedestrians and mobility scooters to cross with priority over cars. Crossing the Waitrose roundabout is dangerous and difficult, particularly for children, the mobility impaired, parents with prams, or people who are not particularly agile. Traffic speeds are high and there is often significant congestion

(see photos above). This roundabout, and surrounding street layout, needs to be comprehensively redesigned to make walking a desirable and safe alternative to using the car.

149. The underpass between Meadow Road and Sperringate is not located on desire lines and is under-used. Access to it from Siddington is difficult. This is a route to school and children often attempt to cross through this area at school peak times unattended by adults. Safe crossings for children are urgently required.

150. Though not related directly to the South Chesterton Development, the land adjacent to the Churn Link from the Texaco Garage is under the same land ownership and it would be desirable to have a strip of land provided for the Town Council to improve and widen this link which is currently too narrow for cyclists and walkers to share space.

151. All new pavements in Cirencester must be of a standard adequate to enable pedestrians, cyclists and mobility scooters to coexist safely.

Recommendations:

152. The local plan should contain specific policies to identify walking routes and infrastructure improvements with clear delivery mechanisms through development management policies, in particular S106 provisions that will ensure that suitable mitigation is in place before significant traffic-generating development commences.

Buses

153. The existing bus service between Chesterton and the town centre is only hourly and does not run early or late in the day. If buses are to provide a desirable alternative to private car use, as set out in the vision for the South Chesterton Development, urban design is required to accommodate bus stops, passing between buses and cars, and street widths sufficient to accommodate buses.

154. As the population ages, bus use becomes a more important mode for journey into town from the outskirts. This is true for the existing and proposed Chesterton neighbourhoods.

155. In order for a bus service to provide a compelling alternative to private car use, it must be frequent and reliable. Our stakeholder engagement suggested that this should be every 15 minutes between South Chesterton and the Town Centre, and every 30 minutes to Kemble and the RAU/College. This would indicate a minimum of two buses to serve the South Chesterton development. Current annual running costs are around £160,000 per annum for a 28 seat bus. It is unlikely that this full cost can be recovered from fares alone. The Section 106 agreement for the South Cheston development must address this issue in the long term.

156. Stakeholders supported the introduction of low-carbon bus solutions. Consideration should be given in the development to create energy for electric bus charging points or the creation of bio-fuel from locally generated waste or locally grown biomass.

157. Buses are not always attractive to shoppers who often prefer to use their cars.

158. Bus route connectivity in the town centre is subject to discussions around the proposals for the Market Place Improvement Scheme. Careful liaison with bus service providers will be required to ensure the long term viability of bus services to the town centre. Consideration will need to be given to bus priority and the location of bus stops. Bus stops should have cycle parking provision to enable people who live farther away from routes to still easily make the sustainable travel choice.

159. Bus services will need to be frequent, direct, reliable and visit a suitable range of destinations if they are to provide an attractive alternative to the car. The current pattern of only 2% of work commuters from

Chesterton to the town centre by bus indicates that there is a long way to go before there can be any certainty that sustainable transport objectives offered under the vision for the South Chesterton proposal can be realised. A very significant shift in modal behaviour will be required if the new development will not exacerbate existing congestion.

Recommendations:

160. The South Chesterton development must put into place sufficient bus infrastructure across the town (on and off site) to create a desirable network of routes that provide an attractive alternative to the private car. The network must be in place prior to the commencement of the housing development. This should be in the form of physical infrastructure, management agreements and where appropriate, sufficient ongoing subsidy secured by a bond, to ensure that the routes will be maintained for a period of at least 20 years from commencement of delivering new housing.

Access to sustainable transport for the mobility impaired

161. The mobility impaired include people of all ages: parents with young children and prams, elderly people who are unsteady on their feet, people in mobility scooters, and others who find walking difficult. There are many places in Cirencester where pavements are uneven or too narrow to accommodate people with difficult mobility. As the population ages, this will become more important.

162. All new development, whether in existing parts of Cirencester, or the proposed new developments, should wherever possible seek to improve access for the mobility impaired.

Recommendations:

163. Development management policies and standards are required that seek to bring a gradual but steady improvement of access for the mobility impaired.

Rail

164. As the town grows, so will the pressure on Kemble rail station. There is already strong evidence of lack of parking. Bus services are not well used and cannot be relied upon to provide rail passengers with a reliable, timely and convenient service. There has recently been a call for additional parking at the station. This is supported by the Town Council. Improved bus services are also required that collect/drop passengers at a range of convenient locations and that meet the train arrival and departure times. It might be appropriate to reinstate the rail link between Chesterton Holt and Kemble which would take significant numbers of movements off the roads, particularly if the Chesterton rail stop was served by a good Cirencester bus service.

Recommendations:

165. The summer Reg. 18 document should make firm proposals how to improve access to the rail network at Kemble for Cirencester's existing and proposed population.

Town Centre parking

166. Town centre parking remains a highly contentious issue. The Cirencester Parking Partnership and proposals by Gloucestershire County Council that sought to resolve some issues was abandoned because consensus could not be reached. The Town Council has made a firm commitment to the re-establishment of the partnership so that these issues can be resolved.
167. The Reg. 18 proposal puts forward the District-owned car parks as potential development sites but does not conclude whether these will be made available (see discussion above on retail). This is a major criticism of the consultation documents because without certainty about the future use of this land, it is impossible to consider impact and mitigation of the proposed South Chesterton development. The Reg. 18 documents point to a forthcoming parking study, but there is no indication what it will cover nor when it will report.
168. As could be expected, there is no consensus on the approach to parking. The **Cirencester Town Centre supplementary planning document** indicates that decked parking might be a solution for Cirencester's parking problems. This has been mooted for many years and has not progressed for a number of reasons, the most important being the significant cost and the scheduled ancient monument designation under the existing car parks which makes development very difficult (though not impossible).
169. The Market Place improvement scheme will alter the pattern of traffic movement in the town and will have the effect of limiting the routing of vehicles through the town, forcing traffic onto the ring road
170. Further information is required on the following matters, and where possible, this should be included in the car parking study regarding decking (Memorial Hospital/Sheep Street; Waterloo):
- The desirability and necessity of safeguarding key sites for decked parking to prevent planning permissions from being granted that will prevent this option from being realized
 - An assessment of land ownership and whether this will act as a barrier to creating decked parking
 - A view on whether archaeological and listed building constraints can be overcome

Recommendations:

171. The Parking Partnership should be re-instated.
172. The Parking Study should make firm commitments about the future of the in-centre car parks.

Other congestion pinch points that will be affected by the proposed development

173. Consultations on OFC and the Reg. 18 proposals have highlighted junctions of particular concern to local people where significant improvements in flow and capacity will be required if the South Chesterton development comes forward. These improvements should be in place before occupation of more than the first 10 houses.
- A429/A433
 - A429/Stroud Road (Chesterton Roundabout)
 - A429/Chesterton Lane
174. If the South Chesterton development creates an entrance/exit at Spratsgate Lane, commuters will seek to drive south to reach the Spine Road. Portions of this route are not suitable for two vehicles to pass and road widening will be required in places.
175. The infrastructure development plan (draft 2013) suggested that a new highway route through to the A419 to the east of the site should be considered (152). This is supported by consultations from OFC and for this report.

176. Some traffic might also leave via Spratsgate Lane and cut through Love Lane industrial estate. The highways infrastructure in the estate generally, but particularly at the junction between Love Lane and Midland Road will require improvement.

177. The Town Council has resolved that the speed limit on the ring road should be reduced to 40 MPH.

Recommendations:

178. The Transport Assessment for the South Chesterton development, including any pre-application work to agree an approach with the planning authority, must specifically address the impact of the proposal on the other congestion pinch points in Cirencester that will be affected by the new development.

179. The speed limit on the ring road should be reduced to 40 MPH.

Open space provision

180. Public Open Space in Cirencester must be protected from constant development pressure. Significant progress has been made through **OFC's Green Spaces Strategy** to assemble significant areas of Green Infrastructure (GI) for the town. It is now necessary for local plan policies to support the objectives of the strategy and provide long term protection of sites to justify the significant investment of time and money that will be required to realise the Green Space Strategy vision.

181. The NPPF states:

76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

182. Cirencester Town Council considered whether or not to produce a neighbourhood plan and decided that it would be a better use of time and resources to rely upon the community planning process, and formal engagement with the planning systems through the development of the local plan and in response to individual developments. Land in the Green Spaces Strategy therefore can be demonstrated to

- be of particular importance to the community
- is reasonably close to the community it serves
- demonstrably special and holds particular local significance
- is local in character.

183. The Local Planning Authority sought input from parish and town councils on what should be included under this new NPPF designation. Cirencester Town Council suggested one site (Humpty Dumps) as a NEW site but did not put forward other sites suitable for the designation.

184. The Local Green Space designation has therefore only been applied to one site, Humpty Dumps. As part of the discussions about the current consultation with planning officers, it has become clear that since only the NEW site was put forward, it was considered that all other sites were safe from redevelopment.

185. This is based on a misunderstanding. Much of the land included in the Green Spaces Strategy has been assembled under the Town Council's management, but not ownership. Therefore, some of the land may be vulnerable to future development.

186. In Cirencester, Local Green Spaces should be subject to planning policies consistent with the NPPF:

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

187. The Local Green Space designation is welcomed on the Humpty Dumps site but should also include key sites of importance to the community:

- 2 Acre Fields
- Amphitheatre complex (all sites including Querns Wood). Consideration should be given to including the Community Orchard
- City Bank link from the Rose Nursery to London Road
- Abbey Grounds
- Jack Gardiner
- St Michaels Park
- Green route between Jack Gardiner and the open air pool at Thomas Street
- Kingshill Country Park

188. There does not appear to be pressure to create new allotments for the existing community at present, but the proposal to include allotments in South Chesterton should be welcomed. Incidental growing space in elderly care facilities and schools can increase awareness about the value of healthy eating and provide opportunities for quiet recreation – they can therefore contribute to wellbeing.

Recommendations:

189. Additional Local Green Spaces should be designated in Cirencester to reflect the Green Spaces Strategy of the Community Plan.

190. More detail is required to determine how the provisions of para. 74 of the NPPF will be secured.

191. Space for growing, including new allotments in South Chesterton, should be incorporated as a fundamental design principle in new development.

Sports and formal recreation

192. Our Future Cirencester (review) proposes that a Sports Development Partnership should be formed that considers sports provision holistically across the town. The District Council has engaged positively and cooperatively in this project and has commissioned consultants to consider sports provision. The approach taken by CDC should be supported, but more work is required to identify specific needs and solutions. The Town Council's aim is to meet as many needs as possible that have been identified by Cirencester's sports clubs in a way that maximises the total provision, ideally by partnership working between clubs and landowners.

193. Care to preserve and enhance existing sporting facilities should be taken. The planning authority is currently engaged in a study and consultation how this should be done. The Town Council also considering sport provision in Cirencester. This issues should be covered in detail in the summer 2015 Reg. 18 proposals.

Recommendations:

194. The Town Council will continue to work with Cirencester sports clubs and individuals and the District Council to identify a cross-town approach to increasing sports provision.

Design Code for Cirencester

195. Cirencester Town Council will work with the local community and key stakeholders such as the local planning authority and the local highways authority to prepare a design code for future development in the town centre. Development management decisions should take full account of the code once it has been adopted. Areas outside the town centre should pay heed to the code wherever possible. (map showing Sheep Street/Silver Street, Market Place, Dyer Street. Waterloo Car park to AG, London Road, Lewis Lane, Waitrose island site.)

Recommendations:

196. The Town Council will work with the Planning Authority, the community and other stakeholders to prepare a design code and development strategy for the town centre.

197. The planning authority should include the code in the Local Plan as a supplementary planning document and should use it when making development management recommendations and decisions for the affected area.

Key views

198. The historic development of the town is based upon a number of carefully planned landscape and architectural features of value to the local community. As more development occurs in and around Cirencester, it is likely that key views will be obscured. Development management policies are required to protect key views into and out of Cirencester. Key views must be identified and protected from future development. Cirencester Town Council will identify key views as part of its design code for Cirencester.

Recommendations:

199. The Town Council will work with the Planning Authority, the community and other stakeholders to prepare a design code and development strategy for the town centre which will include key views.

Appendix A: workshop attendance

Technical Review of local plan evidence (meeting between District and Town Council officers and consultants) – 8 December 2014

- Andrew Tubb, CTC
- Anthony Keown, ATLAS
- Chris Vickery, CDC
- David Halkyard, CDC
- Helen Donnelly, CDC
- Jennifer Taylor, CDC
- Lesley Davies, CDC
- Mike Napper, CDC
- Natalie Blaken, Nupremis
- Philippa Lowe, CDC
- Sophia Price, CDC

Sustainable Transport (walking, cycling and bus) – 15 January 2015

- Johan Newman, CTC
- Kirsty Robbins, CCDT
- Lord Bathurst, local resident
- Maggie Brown, local resident
- Martin Conyers, CTC
- Meg Blumsden, local resident
- Nick Small, Stagecoach
- Ren Reece, CTC

Urban realm and green spaces – 22 January 2015

- Adrian Hazelwood, Portus & Whitton
- Annie Gould, New Brewery Arts
- Corrine Layless, Local resident
- Deryk Nash, Councillor
- John Whitton, Portus & Whitton
- Maggie Brown, local resident
- Martin Conyers, CTC
- Martin Portus, Portus & Whitton
- Ren Reece, CTC
- Steve Wilson, Portus & Whitton
- Sophia Price, CDC
- Dr Sophie Piebengha, landscape historian consultant
- Val Timbers, local resident

Economic development and skills – 23 January 2013

- Deryk Nash, Councillor
- Helen Charlsworth, Deer Park
- Jim Grant, Cirencester College
- John Nicholas, local resident
- Martin Doidge, Deer Park
- Philip Beckerlegg, Deer Park
- Ren Reece, CTC
- Stuart Tarr, local resident

Transport (car and parking) – 27 January 2015

- Jim Daniels, Gloucestershire County Council
- Jim Grant, Cirencester College
- John Nicholas, local resident
- Lord Bathurst, local resident

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- Martin Doidge, Deer Park
- Ren Reece, CTC

Sports, Wellbeing, Health – 2 February 2015

- Fay Harrison, Gloucestershire Care Services
- Georgina Smith, NHS
- Lord Bathurst
- Lucy Ansell, GP
- Nereide Gilhead, Abbyfied House
- Nigel Gilhead, Abbeyfield House
- Pam Wheeler, Cirencester Athletics Club
- Peter Hill, GP

Appendix B: Summary response to Reg. 18 Document: Development Strategy and Site Allocation, January 2015

Section in Reg. 18 document	Section in this report
5 Vision	Development Strategy
7.2 Growth and development	Economic Development
7.2.1 Economy	Economic Development
7.2.2 Housing	Development Strategy
7.3 Environment	Open Space Provision Design Code for Cirencester
7.4 Distribution Strategy	Development Strategy
8.1 Cirencester	Healthcare Provision and Wellbeing Education Provision near South Chesterton Travel
8.2 Strategic Site, south of Chesterton, Cirencester	Strategic Vision for South Chesterton
10 Local Green Spaces	Open Space Provision
Other	Sports and Formal Recreation