

Mark Godson  
Built Environment Planning  
Cheltenham Borough Council  
Municipal Offices  
Promenade  
Cheltenham GL50 9SA

31<sup>st</sup> August 2008

Dear Mr Godson,

**Ref: Location of Proposed Cheltenham Hospital Multi-Storey Car Park**

As local residents and operators of a nationally important heritage facility, we recognise the need to improve the access to the hospital site by its staff, patients and visitors. However, the scale of this proposal is simply unsustainable, giving us cause for real concern. In summary:

1. the plans contradict the stated aims and principles of the Gloucestershire Hospitals Trust;
2. the plans contradict the goals and strategies of both Cheltenham Borough Council and national planning policy and guidance, particularly with regard to low carbon development and sustainable and healthy communities;
3. this proposal undermines the amenity value of Sandford Parks Lido, which has commissioned a Conservation Management Plan following its Heritage Lottery Fund grant, plus a range of targets outlined in the Government's health, social cohesion, sport and heritage agendas.

We have outlined these in an Annexe to this letter. We ask you to request full, detailed and measured responses to the issues, that we and the Lido Trust are now raising, from the Hospital Trust and their planning consultants.

Sandford Lido Limited have tried and will continue to attempt to work directly with the Gloucestershire NHS Trust raising concerns and trying to obtain a full understanding of how the proposed project will implicate such an important site in Cheltenham.

Yours sincerely,

Julie Sargent, Sandford Parks Lido Trust - Sandford Lido Limited  
Jeremy Lake, representing College Road residents  
Will Swainson representing Orrisdale Terrace and Keynsham Road residents

## 1 Proposed Planning Submission by the Hospital

We note that Cheltenham Borough Council have requested and not yet received the following 12 reports:

- Statement of community consultation
- Planning Statement
- Car Park Management Plan
- Transport Assessment
- Arboricultural Survey
- Noise and Light Impact Studies
- Construction Strategies – particularly as 8 Orrisdale Terrace is about 33' from construction
- Sub-path / daylight assessments
- Waste Minimisation Statement
- Renewable Energy and Carbon reduction Statement
- Flood Risk Assessment (if required by the Environment Agency)
- Contaminated Land Assessment (if required by the Council's contaminated Land Officer).

We would also, however, like to draw your attention to the following items that we consider should be reported on by the Hospital and their planning consultants prior to submission:

- We are not convinced that - and as has been born out by a steady accretion of development within the hospital site – the Multi Storey Car Park (MSCP) fits clearly within any long-term scheme or strategy for Cheltenham General Hospital.
- Any car parking spaces must be for the use of staff and patients only. The Green Travel Plan, which comes from the Hospital Trust Board Papers of June 2006, recognises the specific needs of shift working staff, who are required to enter and leave the site during anti-social hours (section 2.2), but also stresses the importance of minimising the impact of car use and encouraging travel 'in an environmentally friendly manner' (2.1, 3.1). The document goes on to state that the Gloucestershire Health Overview and Scrutiny Committee have 'park and ride' as a key principle of its Green Transport Initiatives (3.6), which also seeks (in 3.4) to promote car sharing and other initiatives. The Hospital Travel Plan, 2006, also identifies key aims focused on the reduction of car travel and the need to sustain a healthier lifestyle for staff and the wider community.

Extract from Cheltenham General Hospital Green Travel Targets, 2006

### A. Staff

Car Drivers: 65% target in 2009-12, down from 67% recorded in 2004

Bus & Train: 5% target in 2009-12, up from 4% recorded in 2004

Cycling: 9% target in 2009-12, up from 7% recorded in 2004

Walking: 17% target in 2009-12, up from 16% recorded in 2004.

### B. Visitors

No targets appear to have been set in their 2006 Travel Plan, but recorded figures are as follows:

Car Drivers: 46% recorded in 2004

Car Passengers: 34% recorded in 2004

Bus & Train: 7% recorded in 2004

Cycling: 0% recorded in 2004  
Walking: 6% recorded in 2004.

Question for the Trust: why have targets not been set for Visitors?

The overall question that needs asking is how does a 400 space MSCP fit in with the Hospital Trust's Green Travel Plan and their Plan targets above? It clearly does not; it positively encourages car usage.

## **2 Conflict with Local and National Planning Policy**

The MSCP proposal as it stands contradicts a whole range of local planning policy and guidance as published by Cheltenham Borough Council, principally:

2.1 *Cheltenham Community Plan*, which sets out the vision for how the borough can develop over the period to 2020, its five main priorities including:

- To reduce crime and disorder, and the fear of crime, in our communities.
- To protect and improve the environment of Cheltenham and make it a beautiful and sustainable town (that is, a town that can grow and develop to improve quality of life for all, now and in the future).
- To improve sustainable travel and transport options (that is, transport that allows the whole community to travel safely and easily in an environmentally-friendly way).

2.2 The emerging *Local Development Framework*, including the promotion of alternative forms of transport and Park and Ride (*Local Development Framework*, 2006, Plan 11, p. 167).

2.3 The frequently stated aim and principle to tackle climate change and for a carbon-neutral borough, embedded in the Council's corporate strategic frameworks, its Civic Pride Project and the Council's signing of the Nottingham Declaration in 2002. Objectives such as reducing car use and volume, of course, are difficult to deliver without an evidence-based and integrated approach that does not put related issues into separate boxes. This is acknowledged in the principles of community engagement and sustainable development embedded in the reformed planning system – both in national guidance (PPS 1, *Delivering Sustainable Development* and 2006 supplement), the *Regional Spatial Strategy*, the *Sustainable Development Framework for the South West* and the *Gloucestershire Structure Plan Second Review*. These objectives – which include the desire to reduce crime (hardly an attribute of any MSCP) - are also listed in the *Sustainability Appraisal* for the proposed re-appraisal of the *Central Conservation Area* (Table 11, objectives 2, 5, 8, 10, 11, 12, 13, 15, 17-20). The scale of this development requires a very stringent interrogation against the *Decision Aiding Questions* that are included in this *Appraisal*.

A range of issues addressed under the *Second Review Cheltenham Local Plan*, which was adopted in July 2006 and covers the period to 2011:

1 It states under the section on conservation area designation that, in accordance with Section 71 of the *Planning (Listed Buildings & Conservation Areas) Act 1990*, conservation area designation 'represents a commitment by the Council to the preservation or enhancement of the area' and 'requires local authorities to formulate and publish proposals for the preservation and enhancement of conservation areas as appropriate';

2 *Environment* O11 to conserve and improve Cheltenham's architectural, townscape and historical heritage; O12 to conserve and improve Cheltenham's landscape character and green environment;

3 *Recreation and Leisure* O26 to maintain and enhance existing opportunities for recreation and leisure; O27 to increase the range of facilities for recreation and leisure;

- 4 The Core Policies and Proposals listed under Policy CP 3: Sustainable Environment;
- 5 The document also refers to the importance of recreation (12.20- 23), green space (6.7-8), views and setting (6.12-13).

The contradiction between this MSCP proposal and the objectives outlined above is critical. It will substantially increase traffic volumes, add to congestion and carbon emissions and have an adverse impact on the local infrastructure and communities that are in turn critical to sustaining the distinctive and special character of the urban core of Cheltenham.

### **3 Impact on Sandford Parks Lido**

#### *3.1 Its importance*

Sandford Parks Lido is hugely valued by its community of users. In addition to the £250,000 contributed as direct donations by the public, the Heritage Lottery Fund in 2006 contributed £382,500 towards the cost of refurbishment works for the main pool. The Lido has prepared for public consultation a conservation plan, copies of which were sent to the Hospital Trust and Cheltenham Borough Council in May 2008. A summary of the draft plan, and a full version with many plans, photographs and drawings, can be found on the Sandford Parks Lido website at [www.sandfordparkslido.org.uk](http://www.sandfordparkslido.org.uk). This has found that 'out of 98 surviving sites in England, Wales and Scotland, Sandford Parks Lido represents better than any other lido how the pool, buildings and landscape were all designed as a unified whole – that Sandford Parks Lido represents better than any other site how the planning of lidos presented opportunities to *link buildings to landscape and open space*, and thus harness the regenerative qualities of air and sunlight'. It now serves as a perfect venue for community sport, and its development as a concept in parallel with the enhanced role of communities in national government and the planning system.

#### *3.2 Designation*

The proposed development is sited next to and will overlook the Lido has been included on the list of 'Buildings of Local Importance' published by Cheltenham Borough Council in 2006. The Lido is sited in the Central Conservation Area, which was designated in 1973 but is now being subdivided into distinct 'character zones'. Any re-appraisal MUST (see 2.3 above) make use of the information contained in the conservation plan.

The conservation plan also clearly sets out the key values of the Lido, both aesthetic, historic and in terms of the benefits that the site offers to the wider community and to stated objectives in local planning and community policies and strategies, as well as national policy (e.g. PPG 17 Sport and Recreation) and the designation of the Lido – one of only a handful of 50-metre pools in the United Kingdom - as a training venue for the 2012 Olympics.