

Planning Policy
Cheltenham Borough Council,
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To Whom it May Concern,

**Public Consultation on the Cheltenham Plan Pre-Submission
consultation: Land at Reeves Field, Cheltenham.**

I am writing on behalf of Cheltenham College. This representation is made in response to the Cheltenham Plan Pre-Submission Consultation with regard to supporting allocation of land at Reeves Field, Cheltenham for housing. Supporting documents which accompany this representation are as follows:

- Playing Pitch Assessment Report prepared by Consult QRD
- Heritage Assessment prepared by Cotswold Archaeology
- Sketch Layout prepared by Integrated Architecture Heath Avery Astam

Site and Surrounding Area

Land at Reeves Field, Cheltenham measures approximately 4.52 hectares and is a flat, greenfield site that lies within the Principal Urban Area of Cheltenham. To the north of the site lies public open space with residential development located along King Arthur Close to the east of the site. To the south of the site lies Charlton Park Drive, with East Gloucestershire Sports Club beyond. To the west of the site lies the Old Bath Road with housing beyond.

The site is also located within the Central Cheltenham Conservation Area. There are a number of Grade II listed heritage assets beyond the Old Bath Road to the west.

The overall site is currently used by Cheltenham College as private sports playing fields, however Cheltenham College no longer use all the pitches at Reeves Field and therefore alternative options are being considered. Half of the overall site is to be developed for housing whilst the other half will be

retained for sports use by the College. This will result in the loss of one playing field but in terms of pitch provision the same number of pitches will be retained allowing more efficient use of the land. The sale of the land will be used to improve existing sports (and educational) facilities owned by the College. The first priority will be to ensure playing pitch and sports provision is enhanced, rather than just maintained and secondly the portfolio of listed buildings owned by the college including the Grade 1 listed Thirlestaine House, require significant investment to maintain their fabric and integrity.

The funds released from the sale of the land would enable the college to make real progress with works to the buildings which will ensure they remain in a viable use and are protected, preserved and enhanced where required in order to protect and enhance the surrounding historic environment and the conservation area in which they sit. The provision of monies towards the preservation of these historic buildings will also in turn enable their greater community use, at Thirlestaine House in particular.

Background

The Cheltenham Local Plan is being produced in order to identify site allocations within the Cheltenham Borough to demonstrate how Cheltenham will meet the development needs as set out in the overarching Gloucester, Cheltenham and Tewkesbury Joint Core Strategy up to 2031.

Of particular reference to this representation is Policy H1 – Land allocated for Housing Development. The site has been removed as a housing allocation under this policy despite the fact that it had been supported throughout the emerging local plan process to this point. This prior support is demonstrated in the previous Preferred Options (2017) consultation as well as the Integrated Appraisal (Sustainability Appraisal) (2017) and in light of this position; this representation seeks to retain that support for the site as an allocation.

The preferred options document regarded the site under paragraph 6.5 in the preferred options for housing development where it stated:

“This is a flat, greenfield site within the urban area. The area is predominantly residential, with public green space to the north and East Gloucestershire sports club to the south.

The site is used by Cheltenham College as private sports pitches and is now being promoted for development. Development of the site would require a detailed masterplan which takes into account the site’s location within the Central Conservation Area and the identified key views to the scarp across the site, which limit the potentially developable area. The potential loss of sport pitches would also need to be justified.

It is estimated that the site has capacity for around 80 dwellings, assuming that around half of the site is retained as green space.”

Appendix E of the same document regarded all proposed housing sites, highlighting how The Reeves was considered as a “Green” site which had the highest potential for development. The constraints which required justification were in relation to the loss of sports pitches, landscape and heritage impacts. It is notable that the heritage impacts were based on the sites location in the Cheltenham Central Conservation Area, and no reference was made to the impact on the surrounding and settings of listed buildings.

The Integrated Appraisal Document further considered the site in relation to the Sustainability Appraisal Objectives under site reference: CP603. It deemed the site as acceptable and had the capacity to support 40 dwellings to come forward in the latter stages of the plan period due to a number of considerations:

- The site is surrounded by compatible land uses
- It is adjacent to Cox’s meadow – public green space
- 400m from existing employment
- 600m from existing services and facilities
- 400m from bus stop and PROW
- Satisfactory Access
- No designated or non-designated biodiversity on site
- Not in the AONB nor was the site considered as part of the JCS Landscape Sensitivity Study
- Not in the Green Belt
- Adjacent to Grade II Listed Thirlestaine Hall with further listed buildings and non-designated along the A40 (Bath Road), site also lies within the Cheltenham Central Conservation Area

The proposal when assessed against all sustainability criteria performed favorably being neutral, compatible or very compatible in all aspects, demonstrating accordance with the “golden thread” which runs through the NPPF and its requirement for the presumption in favor of sustainable development.

Overall, the assessment explained that the site will require a sensitive and responsive design which respects the historic townscape and does not lead to significant adverse effects, but that this is achievable given the capacity of the site and its available and potential mitigation strategies.

Despite previous support for the site as an allocation in previous Local Plan reports and consultations, the site is no longer included as an allocation in the Pre Submission Local Plan Document which is the subject of

this consultation. The reasoning behind this set out in the evidence base of the Housing and Mixed Use Topic Paper (January 2018) now states;

“The site fits with overall sequential approach of the plan as it is within the existing urban area. As an open field which is regularly used (privately) it is distinct from other green field sites in the plan. The site is within a Conservation Area and forms an important part of the character of it. It also forms the setting for a number of listed buildings. The harm to these heritage and their setting has not been demonstrated or shown to be acceptable. Views across the site towards to Leckhampton Hill and Cleeve Hill also currently form an important part of the character of the area. As the site is used currently by Cheltenham College as sports pitches any development that result in a loss of a pitch would have to be justified or reprovided elsewhere. When put together these constraints are substantial and indicate the site is not sustainable. Insufficient evidence has been provided to challenge this position. “

It is accepted that the site fits within the overall sequential approach of the plan and sufficient background work has now been undertaken to address the historic constraints identified and to justify the loss of sports pitch provision and the case will be set out as part of this representation. Visual constraints will also be assessed.

Relevant Planning Policy

Emerging Cheltenham Plan

Housing Needs

Emerging Policy H1: Land Allocated for Housing Development. This policy sets out the proposed housing allocations in accordance with the housing requirements and evidence base of the recently adopted Cheltenham, Gloucester and Tewkesbury Joint Core Strategy, which seek to deliver development within the existing urban areas and through strategic allocations in accordance with policy SP1, the Cheltenham Plan Allocations are smaller scale non-strategic sites.

The policy notes the constraints of the Green Belt and AONB on the existing built up area of Cheltenham and seeks to develop under-used sites within the existing urban areas. A defined methodology to identify the sites has been set out and is as follows:

- All sites are of 0.5ha or more in size and capable of accommodating 10 or more residential units

- Sites were chosen sequentially: brownfield development was explored first, those within the Principal Urban Area (PUA) or identified as having development potential in the JCS, and finally constrained sites in the PUA, those in the Green Belt and AONB.
- Sites were chosen which would demonstrate a public benefit in allocation through, for example, masterplanning and those not so advanced in the development management process that approval was likely to be granted before plan adoption.

National Planning Policy

Housing Needs

National Planning Policy is clear within Paragraph 14 of the NPPF which states that *"local planning authorities should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits."*

Paragraph 17 of the NPPF states that *"Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability....."*

NPPF in Paragraph 47 seeks *"To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."* and in paragraph 50 to *"deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

** plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community..."*

Preparation of Local Plans

Paragraph 151 states that Local Plans must be prepared *"with the objective of contributing to the achievement of sustainable development². To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*

Further, paragraph 152 identifies that local planning authorities should *"seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three."*

The framework in paragraph 158 seeks to ensure that local plans are *"based on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of an area. Local*

planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals

Paragraph 182 of the framework identifies that in order for a Local Plan to be declared “sound” it is essential that the plan is:

1. Positively prepared
2. Justified
3. Effective
4. Consistent with national policy.

Historic Environment

Paragraph 126 requires Local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment. In doing so local planning authorities should take into account:

- *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.”*

Playing Fields

Paragraph 74 of the framework identifies that 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.”*

An assessment is now provided of land at Reeves Field within the context of the suitability, achievability and availability of the site to demonstrate that the housing allocation of the site is indeed positively prepared, justified, effective and compliant with national policy in line paragraph 182 of the NPPF.

Suitability

Issues to be resolved:

- Historic Environment
- Visual Impacts
- Playing Fields
- Comparison with Other Sites

Historic Environment

As previously identified, the site lies within the Central Conservation Area, which occupies the entirety of Cheltenham Town Centre and the majority of the Victorian, Edwardian and C20th suburbs. The site also lies within the 'College Character Area' which identifies both the site and the adjacent Cox's Meadow as 'key open green spaces'. The site itself does not include any buildings and therefore no architectural interest is present, the historic interest lies in the site as a remnant of the former Charlton Park and its potential contribution to the setting of other surrounding architectural and historic elements.

It is considered that the site can accommodate the intended housing development such that the objectives of the conservation area (in terms of legislation and policy) are met. Additionally, the Council have previously accepted that the existing built development to the east as seen from the public vantage points (which lie on three sides of the site) detract from the character and appearance of the Conservation Area. The allocation provides the opportunity for sympathetically designed residential development to screen such development which in itself will enhance views into the site, helping to offset the loss of green space. Indeed paragraph 126 of the Framework identifies that local planning authorities when plan making should take into account "*the desirability of new development making a positive contribution to local character and distinctiveness.*" Therefore the screening of existing development that does not contribute positively to the Conservation Area with built development that is more reflective of the characteristics of the Central Conservation Area is supported by the NPPF.

To further support this position a Heritage Assessment has been undertaken which accompanies this representation. It concludes that the proposal will preserve the special architectural and historic interest of the proximate listed buildings. There will be no harm in the significance of the group of four listed buildings at Thirlestaine Hall as a result of the proposal. It is further accepted that the role and value of the space in the Conservation Area on the site will be reduced however, this is considered to constitute less than substantial (lower end) harm. This identified harm would then need to be weighed against the public benefits of the scheme as per paragraph 134 of the NPPF.

Visual Impacts

A further reason behind the site's removal as a potential allocation is the impact the development of the site would have on the views across the site to Leckhampton and Cleeve Hill. The site at present has no buildings upon it but nor does it fall within any landscape designations or protected views. It sits within Cheltenham's Principle Urban Area and its visual composition is dominated by existing development with several residential estate roads such as King Arthur Close which lie adjacent to the eastern boundary of the site, to the west is the A40 and to the north is an area of POS both of which have residential development beyond. To the south lies Charlton Park Drive with East Glos Club beyond.

Immediate views into the site from the A40 (western boundary) would change from that of an undeveloped field to one where a small housing development would be seen, however as only half of the site is to be developed the fields fronting the A40 currently would be retained and the new housing would assimilate well with the existing development beyond the sites eastern boundary, and would be seen in this context from the wider viewpoints on Cleeve and Leckhampton Hill.

Views from Charlton Park Drive (southern boundary) across the site would change given that there is little existing screening along this boundary, however this could be increased to provide a more vegetated boundary such as is used to screen views into East Glos club along this road.

Views into the site from King Arther Close (eastern boundary) are fully restricted by existing residential development and this would remain unchanged if the site were to be developed. The private gardens of the properties along this road which front onto the site have large well screened hedgerows and tree planting which also restrict views into the site in their current position and again this would remain unchanged as part of the proposal with sufficient space to be retained between the existing and proposed properties to prevent any issues of loss of amenity and overlooking.

Views into the site from Sandford Mill Road (northern boundary) leading onto Southgate drive are also currently restricted due to the sloping landform of the POS which abuts the sites northern boundary and existing residential properties, again which have extensive vegetated boundaries which bound the River Chelt which runs behind them.

Current views may be more restricted, but their overall significance won't be materially harmed and the key vistas across the site would be largely retained.

Playing Fields

A playing pitch assessment has also been undertaken to support this representation which sets out the preliminary consideration of options to offset the proposed development and justify the loss of playing pitches. The proposed development for approximately half the site will result in the loss of two existing rugby pitches. This loss will be offset however by the more efficient use of the prep school facilities whereby total playing pitch numbers will remain the same – the development of the site would merely result in a reduction in ha space. This college will facilitate this by marking out additional pitches on other available playing fields around the estate such that no significant impacts on the college and wider public use and access of the pitches will arise. The proposals are therefore considered to be of limited harm.

It is recognised that the proposals may not be in accordance with Sport England guidance as the current mitigation strategy could be seen as an intensification of pitch use rather than the provision of new and/or replacement facilities. However, the college is confident they can produce policy compliant proposals for mitigation as part of any future development proposals.

Comparison with other sites

Looking at the sites which have been allocated under emerging policy H1, two are the most comparable to the proposed site allocation:

- HD1 Christ College Site B
- HD2 Former Monkscroft Primary School.

Both are greenfield sites within the Principle Urban Area and are made up of playing fields – their “former” or “disused” nature does not change their lawful use as a playing field and therefore any developments must still accord with paragraph 74 of the NPPF - albeit that they may conform to a separate bullet point.

Looking at the Sustainability Appraisal, the Christ College Site B was seen as having a potential major negative impact on SA objective 5b (access to strategic footpaths and cycle routes) due to its location beyond the 400m distance from any PROWs and cycle paths, it was identified that significant improvements to both transport options would be required. By comparison the proposed allocation at Reeves Field is within the 400m walking distance from a PROW and the development of the site has the potential to generate a minor positive effect against objective 5b.

The former Monkscroft Primary School Site was seen as having potential major negative impacts when it came to objectives 6 (traffic) and 7 (air quality and climate change). This is due to congestion problems along the A40 which would be exacerbated with the development along with air quality issue and the

potential need for capacity analysis along Princess Elizabeth way as identified by the Highways Development Management comments. By comparison the proposed allocation at Reeves, with its low site capacity and mitigation provision through the GTC, JCS and Cheltenham Plan means development here would only have a neutral effect on SA objectives 6 and 7.

With the above in mind and as aforementioned, the proposed allocation at Reeves scored higher than both of the current allocations on playing fields in the SA, with the Monkscroft site also requiring a design which respects St Marks Conservation Area in which the site lies adjacent to and the Christ College Site B needing railway noise and vibration mitigation, highlighting how they too are not without constraints. As has been demonstrated throughout the above sections, The Reeves can overcome its issues of heritage, landscape and justification for loss of playing pitches and should be considered as an allocation as it was previously deemed acceptable, any constraints have been offset and addressed and the site is arguably more suitable than the other allocated playing fields given its performance in the SA and its evident sustainability credentials.

A final point to note is the deliverability timescales looking at the table 10 trajectory of housing allocations, The Christ College Site B, will not start delivering its units until 2022. With 25 to be delivered from 2022-2023 and 45 to be delivered in 2023-2024. Dependence of sites with such lead in times could leave the Council in a vulnerable position in terms of housing supply. Conversely, The Reeves site can be delivered in full within the next 5 years providing a more reliable site for allocation. Furthermore, the strategic sites, namely North and North West Cheltenham are still some way off coming forwards, particularly with the significant infrastructure delivery required, therefore to maintain future delivery smaller non-strategic sites play a valuable role in delivering housing (including affordable) in the immediate term, such as the Reeves site which is the subject of this representation.

Summary

In summary, the proposal to develop approximately half the site for residential development with the remaining half being retained in the College's ownership for sports provision and as retained open space, will help to preserve the character and appearance of the Conservation Area.

The loss of the playing fields on half the site is not harmful as they are surplus to the College's own requirements (to whom use is restricted). The holistic proposal would include the rationalisation of remaining space to ensure that the same number of pitches would be provided post development. This rationalisation would be facilitated by the a part of the funds generated from the market sale of land at Reeves Field for housing. These funds will also assist in ensuring the fabric and integrity of college's

significant portfolio of listed buildings, including the Grade 1 listed Thirlestaine House, are maintained. Finally, the funds would also facilitate works to the buildings to ensure that they remain in a viable use and to protect and enhance the surrounding historic environment and the conservation area in which they sit.

The allocation will result in the loss of two playing pitches which can be readily replaced on sites within Cheltenham College's ownership or the upgrading of existing provision in proximity to the site. This is supported by paragraph 74 of the framework. The allocation and subsequent development would enable strengthened sports facility provision at the school, with no loss of pitches occurring. It would allow for the most efficient use of land in a sustainable location to support the much needed provision of housing in an area with recognised constraints.

Sustainable Development

An assessment is now provided below in the context of paragraph 7 of the NPPF which also satisfies the criterion with paragraphs 151-152 of the framework.

Residential development of part of this site would meet the *social* dimension of sustainable development by providing a range of housing, including affordable housing, to meet the needs of Cheltenham Borough. The site is proximity to a range of facilities and services within Cheltenham and there are also established public transport connections to the wider Cheltenham area. The provision of monies towards the preservation of the historic buildings within the proximity of the site generated from the sale of the land, will also in turn enable their greater community use, at Thirlestaine House in particular.

The *economic* dimension would be met by providing a range of dwellings in a sustainable location which would contribute to economic growth. New residents would help towards the economic dimension, with a proportion of their income being spent on local services and facilities. Additional employment would arise from the construction and sales phases of the development.

Finally, the *environmental* dimension can be met through the development of land that is not constrained by any landscape, ecological designations. The site lies within Flood Risk Zone 1, the lowest category of flood risk, according to the Environment Agency Flood Risk Maps for Planning. Whilst the site lies within the Central Conservation Area, a development of circa 50% of the site would result in less than substantial harm to the conservation area and will help to screen existing built development which the Council accept does not positively contribute to the characteristics of the Conservation Area. Future housing development at this site would lead to the partial loss of a greenfield site and a playing field in private ownership, however, this is offset by the land being surplus to the school's requirements and the funds generated from the sale of the site being used to deliver improved existing sports facilities owned by the College and the

upkeep of the school's existing assets which includes a number of heritage assets. It is clear that the allocation of land for housing at Reeves Field will deliver substantial social, environmental and economic benefits.

In the round, the allocation would be sustainable development. Overall, residential development on part of land at Reeves Field, is considered to be suitable, justified and compliant with national policy for the scale of residential development proposed and should therefore be allocated as a site for housing as was previously considered in accordance with emerging policy H1.

In previous consultations the site was assessed and supported as a potential allocated site, the identified constraints in terms of the historic environment, loss of sports pitches and landscape impacts have been offset and addressed as part of this representation and supporting reports therefore there is no reason for this site to not be allocated as it has been demonstrated it can accommodate the identified levels of development.

Status of the Land

The National Planning Policy Framework states that for sites to be considered 'deliverable' means they will be available now, in a suitable location now and achievable within five years and viable, as per footnote 11 of paragraph 47.

Suitable

The site is suitably and sustainably located for development with good accessibility to local services, as identified in the above section of this document. There are no physical constraints that would prevent or delay development coming forward on the developable area of the site.

The wider area surrounding the site to the north, east and western boundaries is made up of existing residential development and as such, the site is clearly located in a sustainable location suitable for residential development given the surrounding compatible land uses.

Available

There are no legal or ownership problems to preclude delivery well within the future plan period, or earlier. Despite the site being within the ownership of Cheltenham College, there is confidence within the housing market which will ensure it timely delivery. The site is available immediately with delivery of all units within 5 years. The site is therefore available.

Achievable

Cheltenham College wish to support the site to be allocated for housing in the emerging Plan period. The land in question is a greenfield site and has no physical constraints thus contributing to its timely delivery.

This site is in a location that developers find attractive to bring forward housing sites for development. Residential development represents a viable future use for the site which can be delivered quickly. As such, development of the site can be considered achievable.

Overall, land at Reeves Field, is considered to be suitable, available and achievable for future residential development. Therefore, the suggested allocation of the site for housing is entirely justified, effective and compliant with national planning policy. The site is therefore considered to be a 'deliverable' housing site in the context of the NPPF. There is no reason why the site could not be delivered during the Plan period.

Conclusion

To conclude, the site is suggested as a housing allocation to be contained within emerging policy H1 and is entirely justified, effective, and compliant with national policy in line with the aims of paragraph 182 of the NPPF. The plan is considered to be unsound at this time on the basis of the above; the current site allocations have not been positively prepared or effective in their delivery of much needed affordable housing in the short term and significantly boosting the supply of housing overall.

Please do not hesitate to contact me should you require further information.

Yours Faithfully,



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