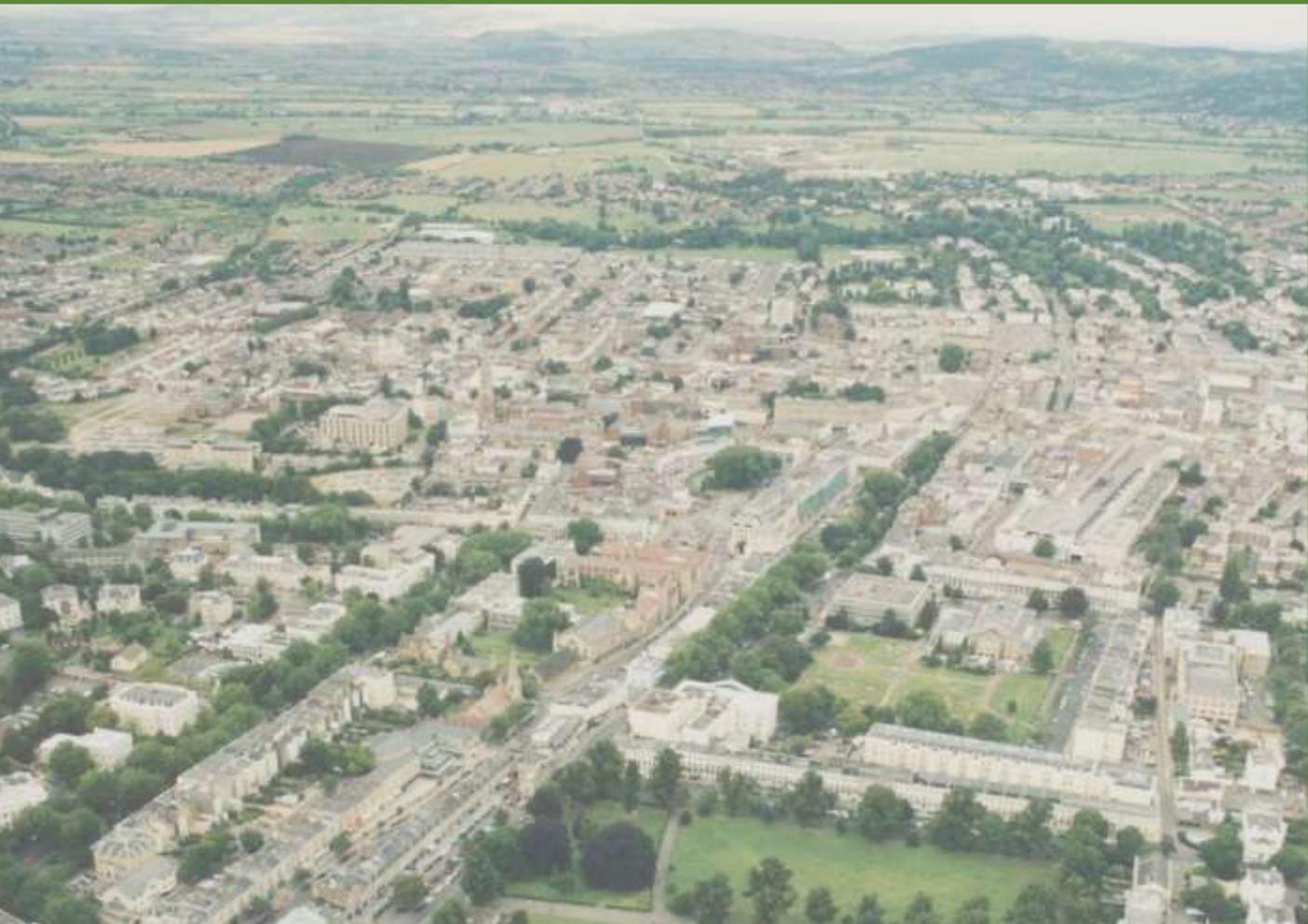


Cheltenham Plan (Part One) 2011 to 2031

Preferred Options Consultation



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FOREWORD

I am pleased to introduce the Cheltenham Plan (Part One) Preferred Options.

The Cheltenham Plan will, along with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), be the basis for decisions on land use planning in Cheltenham up to 2031. It will set out policies which guide how and where development should take place in the Borough and will, upon adoption, supersede the existing development plan for Cheltenham.

The contents of the Cheltenham Plan reflect the 3 themes of the Council's vision which are to ensure that:

- ***Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities.***
- ***Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all.***
- ***Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally, and tourists choose to visit and return to.***

The Plan is being developed alongside an emerging Place Strategy for the Borough as part of a co-ordinated approach designed to support economic growth, facilitate environmental enhancement and secure the future wellbeing of our communities in accord with the Council's vision.

This 'Part One' document deals primarily with policy relating to the development and protection of land for residential and employment use; the designation of 'Local Green Space' for some green areas in Cheltenham; and the setting out of an economic strategy for the Borough. Part Two of the document will be issued for consultation later in the year and will contain more detailed development management policies on a variety of related topics.

There will undoubtedly be some difficult decisions to make as part of plan preparation but the evidence contained within this document contributes the information necessary in order to help make these decisions. Comments are now invited with the document being made available at the Municipal Offices, libraries and other public locations (in paper copy) and also on the Council's website.

Feedback from our residents forms an essential part of the Plan's preparation. This consultation will allow people to have their say on specific options whilst also allowing us sufficient time to take feedback into account before the Cheltenham Plan (Part One) reaches its next stage – the pre-submission version.

Cllr Andrew McKinlay,
Cabinet Member for Development and Safety

EXECUTIVE SUMMARY

The following bullet points represent a brief summary of each chapter of the document. Please read each chapter in full before making a comment.

INTRODUCTION

- The Cheltenham Plan: Part One will, when adopted form part of the statutory development plan for the borough.
- The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy will contain overarching, strategic level policies which the Cheltenham Plan will complement in providing a more local level of detail.
- This consultation sets out the Council's preferred options for Part 1 for the Cheltenham Plan and not final decisions.
- The consultation is an opportunity for everyone to input and have their say on what the Council think is the best way forward for the borough.
- It is a relatively early stage consultation and there will be more opportunities for people to have their say in future.

VISION AND OBJECTIVES

- The vision and objectives have been through two sets of consultation and have been shaped by local communities and businesses.
- The Cheltenham Plan vision and objectives should also be viewed within the context of those of the JCS as well as the Council's own corporate vision and emerging place strategy.

THE ECONOMY

- Cheltenham has a diverse economy with a very strong retail offer.
- The number of jobs in the Borough has been increasing strongly.
- Cheltenham supports a significant number of jobs and provides work for many living outside the district.
- Cheltenham has a large amount of office space but some of it is not the right size or type for modern business requirements. There is a high demand for more contemporary office space.
- The Cheltenham Plan will play a key role delivering the aspirations of the Joint Core Strategy.
- There are opportunities for expanding activities in the cyber-security and associated sectors.

THE ECONOMIC STRATEGY OF THE PLAN

- The Cheltenham Plan is part of a coordinated approach to deliver economic growth with a range of organisations.
- This part of the Cheltenham Plan is focused on the traditional employment uses (office, industrial, warehousing etc.) as these remain an important part of the economy.
- The Plan will introduce a special designation for key employment sites which will protect them from changing to other uses.
- Other employment land will still have strong protection but will have some flexibility for changing to other uses.
- A small number of sites not currently used for employment will be allocated for job generating use.
- A policy to promote the cyber-security industry is proposed.
- The former Honeybourne Rail line will continue to be safeguarded for sustainable transport.

LOCAL GREEN SPACE

- The NPPF makes provision for local communities to identify green areas of particular importance where development will not be permitted except in very special circumstances.
- Local Green Space (LGS) is an exceptional designation and is not suitable for most green spaces.
- Evidence provided by the community has been assessed by a panel of officers using criteria derived from national policy and guidance.
- LGS at Leckhampton is not part of this consultation because it currently remains part of JCS discussions. It will be included in the next stage of the Cheltenham Plan.
- The preferred option sets out five sites to be designated as LGS at this stage.

DEVELOPMENT PROPOSALS

- One of the aims of the Cheltenham Plan is to ensure that the Council maintains a healthy supply of land for housing.
- The JCS sets a housing requirement for Cheltenham of 10,915 dwellings between 2011-2031.
- The urban area of Cheltenham has a target to provide 557 additional dwellings.
- The preferred option is to allocate six sites for housing and six sites for mixed-use development to help meet the housing requirements.
- Two sites outside the current urban area (Leckhampton and Arle Nurseries / Old Gloucester Road) are also proposed, although Leckhampton is indicative only at this stage.

AMENDMENTS TO THE PRINCIPAL URBAN AREA

- The boundary of the Principal Urban Area (PUA) is an important part of Cheltenham planning policy.
- It is reasonable that the PUA is reviewed to ensure it is consistent and that any anomalies are removed.
- A review has been undertaken and the preferred option is that proposed changes are accepted.

PERMITTED DEVELOPMENT RIGHTS AND THE USE OF ARTICLE 4 DIRECTIONS

- The Council is aware that the density of Houses in Multiple Occupation (HMO) in the St Pauls and All Saints area has caused issues for residents.
- Currently no planning permission is required for the conversion of a dwelling into an HMO for up to six residents.
- The Council can issue an Article 4 direction which would mean that planning permission would be required but this can have negative effects.
- The consultation seeks responses on whether restricting HMOs is favoured.
- It also seeks responses on whether other specific types of development should be restricted in other parts of the borough.

CONSERVATION AREA REVIEW 2016-2018

- The Council is undertaking a two year review of conservation areas.
- Feedback on the project is not required at this point but officers will engage with local communities directly.

I INTRODUCTION

- 1.0.1 The Cheltenham Plan, together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, the Gloucestershire Minerals and Waste Local Plans and any neighbourhood plans made in the future will, when adopted, comprise the statutory development plan for Cheltenham up to 2031.
- 1.0.2 In a plan-led system, the development plan and neighbourhood plans set out the overarching context and specific policies that are used to manage and guide development through the decisions the Council makes on planning applications. The development plan also sets out higher-level objectives and aspirations that aim both to conserve what is valued and cherished within Cheltenham and to encourage development in spatial and policy areas the Council wishes to promote in the public interest.
- 1.0.3 Whilst the development plan is primarily concerned with land-use planning, it is a shared project that will support delivery of many of the Council's outcomes set out in its Corporate Strategy.

1.1 Policy context

- 1.1.2 Since the adoption of the Cheltenham Borough Local Plan Second Review (2006) national planning policy has been rewritten and condensed into a more streamlined and accessible format. The emergence of a National Planning Policy Framework (NPPF) has also been complemented by the publication of extensive national Planning Practice Guidance (nPPG). Alongside these changes, the Government has also abolished regional and county strategic level planning and, as a result, the Council has entered collaborative working on the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), now at an advanced public examination stage.
- 1.1.3 The above changes have meant that many of the requirements set out in regulations concerning the contents of a local plan have already been met. For example, the JCS identifies objectively assessed development need for the area and sets out requirements for strategic sites. The JCS also contains a suite of strategic development management policies on issues such as design, heritage and the provision of infrastructure.
- 1.1.4 The NPPF and nPPG provide detailed planning policy direction which is explicit in stating that this guidance should not be duplicated at a local level.
- 1.1.5 The JCS picks up the strategic elements of policy, but does not always provide local detail. This is why there is a need for Cheltenham Plan policy to follow closely on from the adoption of the JCS. This is particularly around the areas of:

- Site allocations within the Borough (outside of the strategic allocations identified within the JCS) to demonstrate how Cheltenham will meet its development needs up to 2031;
- A clear local economic strategy which will inform employment, retail and town centre uses provision in the Plan;
- Provision for local infrastructure (particularly local green space).

1.1.6 Policies contained in the Cheltenham Borough Local Plan Second Review (2006) which are not replaced by the JCS or Cheltenham Plan: Part 1 will remain in force. Part 2 of the Cheltenham Plan (which will start to be produced in 2017) will review these policies.

1.2 The Cheltenham Plan approach

1.2.1 The new Cheltenham Plan is divided into two main parts. Part 1 considers the 3 primary issues set out above and is represented by this document. Part 2 will consider topics of a less strategic nature and will contain a suite of detailed development management policies to help shape the way in which Cheltenham develops up to 2031. The Part 2 document will be produced in 2017.

1.2.2 Owing to the fact that policies in the 2006 adopted Local Plan have been saved, we can continue to use policies not superseded by the JCS into the future (providing they accord with the JCS and NPPF). These policies will then be replaced in stages as each phase of the new Cheltenham Plan is produced until the whole of the 2006 local plan is superseded.

1.2.3 The overall approach is one of replacing and updating the policy framework as it becomes necessary in order to most efficiently use the Council's resources and ensure continuity of planning policy cover on these issues. This is reflected in the reuse of policy numbering. The approach has the advantage of flexibility in terms of revision and review in response to changing circumstances which is an inherent feature of the Government's current planning regime, particularly in relation to the nPPG. It also means that changes in local policy will not necessarily require changes to the JCS, because the JCS will only contain the 'hooks' on which Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) will be based.

1.3 Preparation timetable for Part 1

Cheltenham Plan Scope Consultation (regulation. 18)	Completed	July to September 2013
Draft Vision and Objectives published	Completed	February 2014
Issues and Options consultation	Completed	June 2015
Preferred Options consultation	Ongoing	Early 2017
Evidence base work in Winter 2016/17	Future	Winter 2016/17

Pre-submission consultation	Future	Spring/Summer 2017
Submission to the Secretary of State	Future	Summer/Autumn 2017
Examination: projected to be in Winter 2017	Future	Winter 2017
Adoption of Part 1	Future	Early 2018

1.4 The story so far

- 1.4.1 Work on the preparation of the Cheltenham Plan began in 2012. During that time we engaged with the community and stakeholders to establish what the future contents of the Cheltenham Plan should be and how it should be progressed. This is part of a process known as scoping and is one step in meeting the statutory requirements for the preparation of a development plan document.
- 1.4.2 The vision and objectives set out in the scope of the Cheltenham Plan were developed by the Planning and Liaison Member Working Group - a member group that is guiding the preparation of the Plan. The scoping document was subject to an eight week public consultation, ending 2 September 2013.
- 1.4.3 Scoping and development of the Plan's vision and objectives was followed by publication and consultation on the Issues and Options Report in June 2015. This stage in the process identified what the Council considered to be the main planning issues and policy options available to help deliver both the vision and objectives of the Plan and the Council's own corporate vision.
- 1.4.4 The stage of the process that is currently being consulted on is the Preferred Options whereby the results of the previous Issues and Options consultation have helped the Council to 'narrow down' the alternatives available in meeting the Plan's strategy. Having considered the relevant evidence, including sustainability appraisal and the findings of the ongoing JCS process, the Plan has become more focussed than before and whilst it still remains quite broad in its approach, clear spatial priorities have begun to emerge.
- 1.4.5 Government regulations do not say that this Preferred Options consultation is required as part of the plan making process. The Council, however, believe that it is vital that the Cheltenham Plan is as transparent and backed by the community as much as possible. This consultation will allow respondents to have their say on specific options whilst also allowing the Council enough time to take feedback into account before the plan reaches its final version.

1.5 Supporting evidence base

- 1.5.1 Gathering evidence is critical part of the plan-making process. The Cheltenham Plan is supported by a wealth of supporting information, including the sustainability appraisal, habitats regulations assessment, equalities impact assessments and flooding, landscape and transport studies. The sustainability appraisal and associated assessments are an integral part of the whole process and help inform

the contents of the Plan as it evolves over time. At each stage they will have influenced the content of the document by testing the policy options and potential site allocations for their contribution towards each of the sustainability objectives that were defined as part of the aforementioned scoping stage. We are currently seeking comments on the latest version of the sustainability appraisal. The document is available on the consultation website.

- 1.5.2 Throughout the Plan preparation process the evidence base will be kept under review so that policies and proposals are informed by the most up to date information. All development plans are required to be supported and justified by robust evidence which, given the timescales involved, will likely evolve as the Plan progresses through its various stages. It will therefore be important to ensure that emerging policy is not compromised or undermined by changes in the evidence base which underpin it.

1.6 Document layout

- 1.6.1 The first section of this report details the vision themes and objectives of the Cheltenham Plan. This provides a broad steer for the remainder of the document and sets out some of the main parameters within which the Plan will be required to work.
- 1.6.2 Where preferred options are presented there has been an appraisal of all the reasonable options. The best and most sustainable have been selected based on the evidence available.
- 1.6.3 The second section of the report details the economic strategy for the Plan and opens with an overview of some of the key economic characteristics and trends at play in Cheltenham. It goes on to consider the results of previous public consultation exercises on the Plan and why some previously suggested options for dealing with identified economic challenges have been discounted from the plan-making process, before offering a preferred policy response to some of the main economy-related challenges that are currently being experienced.
- 1.6.4 The third section considers local green space and with reference to recommended policy, explains what the plan is trying to achieve and why.
- 1.6.5 The fourth section comprises a series of local sites and designations. It sets out the preferred stance on site allocations for housing having regard to objectively assessed needs and the policies and proposals of the emerging JCS.
- 1.6.6 Following each policy, links are provided to local evidence as well as cross references to other relevant strategies and plans. Supporting evidence is also provided by way of appendices at the rear of the document.

2 VISION AND OBJECTIVES

- 2.0.1 Following the scoping consultation in 2013, the Council published a draft vision and objectives for the Cheltenham Plan in February 2014. The draft vision and objectives were subject to consultation as part of Issues and Options Consultation on the Cheltenham Plan in June 2015 and are included in their latest form below.
- 2.0.2 Local communities, businesses and visitors have all helped to shape what the Cheltenham Plan should deliver (the Vision) and how it should be achieved (the Objectives). Wide ranging consultation has given the Plan a firm direction in which to move forward and this Preferred Options Report provides further detail on how the vision and objectives will be realised whilst aiming to reflect stakeholder involvement in the process thus far.
- 2.0.3 It should be noted that the Cheltenham Plan vision and objectives should also be viewed within the context of the JCS's visions and objectives as well as the Council's own corporate vision. The Cheltenham Plan is also being developed alongside an emerging Place Strategy for the Borough. The objective of the Place Strategy is to draw together the strands which impact on defining Cheltenham as a place and to act as a leadership and influencing tool to support economic growth and the wider well-being of our communities. The chosen way forward will therefore need to ensure that the Plan remains consistent and continues to support the wider aims and objectives of the Council.

2.1 Vision Theme A

Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities.

Theme A Objectives

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities using locally specific models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;
- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Ensure that places are designed in a way that is accessible to all and promotes walking, cycling and use of public transport;
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities; and
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime.

2.2 Vision Theme B

Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all.

Theme B Objectives

- a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- d) Encourage the delivery of sustainable transport infrastructure, a range of transport options and better links across the Borough including parking provision and public transport;
- e) Encourage knowledge-intensive services businesses in high value sectors; and
- f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

2.3 Vision Theme C

Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to.

Theme C Objectives

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;
- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside;
- f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- g) Manage and reduce the risk of flooding within the Borough.

- 2.3.1 During the course of the plan period, the Cheltenham Plan will seek to ensure that all the above objectives are realised through the implementation of the policies and proposals that follow.

3 THE ECONOMY

Background

3.1 Overview

- 3.1.1 Cheltenham's Economy supports approximately 72,000 jobs. The town has a diverse economic market including sectors such as light industry, food processing, aerospace, electronics and tourism. The UK Government Communications Headquarters – GCHQ is also located in Cheltenham.
- 3.1.2 Cheltenham is home to a number of sporting and cultural events. It is the home of the flagship race of British steeplechase horse racing calendar, the Gold Cup, the main event of the Cheltenham Festival held every March. The town hosts several nationally significant annual festivals of culture often featuring nationally and internationally famous contributors and attendees.
- 3.1.3 Cheltenham is also a regional shopping centre, home to department stores such as House of Fraser and John Lewis and retail centres including the Regent Arcade and the Brewery, together with a number of independent and local retailers. Kingsditch out of town retail park also features a number of national retailers and has expanded over time to now comprise 161,500 sq m of industrial and warehouse space. As such, Cheltenham is second only to Bristol in the South West in terms of shopping choice on offer.

3.2 Economic Performance and Outlook

- 3.2.1 Gloucestershire's annual rate of economic growth is in line with the national average (1.8% between 1997 and 2011) although Cheltenham's growth has been slightly lower (0.7% for the same period). However, the rate of jobs growth has exceeded the national average and both economic growth and jobs growth are forecast to be strong over the next 20 years (projected 2.4% increase).
- 3.2.2 Approximately 22 per cent of all Gloucestershire's jobs are located in Cheltenham. The town remains a significant employment centre within the County of Gloucestershire and this status is forecast to continue.
- 3.2.3 Productivity rates in Gloucestershire as a whole are below average and are declining relative to the national average. In 2012, workers in Gloucestershire produced £26.00 of Gross Value Added (GVA) for every hour worked. This was below the English average of £28.30. Between 2004 and 2012, GVA per hour worked rose by 16.3% which was lower than across England at 23.4%. This is a particular issue in Cheltenham where retail and service sector employment has increased whilst higher value jobs have declined. It will be challenging to turn this trend around and increase the proportion of high value employment.
- 3.2.4 The decline in high value employment has partly occurred due to a loss of employment land to other uses and lack of modernisation of commercial office space. There has been a shift in user requirements over the past few years towards more modern offices space and larger office facilities.

3.3 Enterprise and Innovation

- 3.3.1 Cheltenham has a strong and growing business base with stronger than average long-term growth in the number of enterprises (11.7% growth between 2004 and 2012) and a higher than average number of enterprises per head of the working age population (68 per 1000 people of working age in Cheltenham compared to a national average of 60 per 1000).
- 3.3.2 Long-term growth in the business base has been driven by strong business survival rates relative to the number of start-ups which are close to the national average.
- 3.3.3 Business was badly hit by the recent recession but has begun to recover. Between 2007 and 2010, the percentage of businesses surviving for 1 year fell from 97.5% to 88.2%. However, survival increased significantly in 2011 to 93.2%.
- 3.3.4 Businesses in Cheltenham are more likely to compete on quality, design and innovation compared to nationally, and the rate of patenting is higher than the national average (11.1 patents per 100,000 residents as opposed to 9.4 patents per 100,000 residents nationally).
- 3.3.5 Whilst science and engineering occupations are less prevalent in Cheltenham compared to the national average, ICT roles account for a higher share of jobs undertaken by residents than in comparison with the average across England. However, neighbouring authorities are performing well in science and engineering employment so with the creation of new opportunities in Cheltenham there is a prospect of strengthening in these areas.

3.4 Industrial Trends

- 3.4.1 The industry profile and prospects for Cheltenham have changed over the last 15 years and are expected to continue to change in future.
- 3.4.2 *Public Administration, Education and Health* are the joint largest contributor to economic output and one of the fastest growing sectors in that regard. The third largest increase in the number of business units taken up across the Borough since 2000 relates to the health sector and a continuing increase in health employment is forecast.
- 3.4.3 There is a large concentration of employment in *Defence* and the strongest employment growth has occurred in this sector. There is likely to be a continuing demand for subcontracting and supplier arrangements focussing in and around Cheltenham over the next 5-7 years. In this regard, GCHQ runs a small business innovation programme, which is a mechanism for procuring innovative new solutions from technology and innovation-based Small and Medium Enterprises (SMEs). Similarly, there is interest in developing specialist business incubation facilities for the cyber security industry.
- 3.4.4 *Business Services* have grown strongly in terms of economic output (at between 4% and 5% a year since 1997) and are projected to grow further in future. The Professional, Scientific and Technical sub sector occupies the largest number of business services units in Cheltenham.
- 3.4.5 The *Information and Communication* sector has experienced strong growth in economic output and this is forecast to continue. It has the second highest increase

in number of business units in the Borough although there has been a significant fall in employment in telecommunications and printing/ reproduction of recorded media.

3.4.6 *Production* (which includes manufacturing) is an important contributor to economic output, but there has been decline in output in the sector and total business units over recent years. The highest concentrations of production employment in the town are found in the manufacture of machinery for metallurgy and manufacture of taps and valves. A further decline in employment forecast.

3.4.7 There has been a shift to self-employment or contract-based work in many business service roles. The role of finance and insurance, whilst important in the past, has declined in terms of output and jobs. This is also true of the real estate sector.

3.5 People

3.5.1 Cheltenham supports a significant number of jobs and provides work for many living outside the district. The town provides a lower share of higher-skilled jobs, and a higher share of lower-skilled jobs compared to the national average. Cheltenham supports a large number of administrative and secretarial jobs, many of which are taken by in-commuters.

3.5.2 Those working in Cheltenham have a high qualifications profile although this is not fully reflected in the skills levels of the types of jobs undertaken or workplace earnings. In-commuting appears to highest among people with low to intermediate qualification levels.

3.5.3 The levels of unemployment and incidence of benefits claimants are low in Cheltenham, coupled with high rates of economic participation and employment amongst the working-age population.

3.5.4 As with many other parts of the country the population of Cheltenham is forecast to get older. So there will be a higher proportion of people over retirement age and therefore less likely to be in employment.

3.6 Place

3.6.1 Cheltenham's housing market has witnessed significant increases in the prices since the turn of the century and this has been slightly ahead of the national average. Average house prices are now at least seven times average earnings in the Borough.

3.6.2 The economic recession experienced in the wider economy in 2008 did not affect the local housing market significantly. Residential property prices have for the most part remained buoyant and continue to rise. One of the effects of this trend has been to destabilise the local economy and, particularly, to place further pressures on employment land and premises for changes of use to residential.

3.6.3 For example, since 2010, there has been a distinct and clear loss of B1a (office) floor space including sites that were categorised as 'very good quality' in previous employment land studies. There are also demonstrated losses in A2 professional services to residential uses in areas such as the town's historic core where stakeholders had suggested there is a strong market demand for professional services office accommodation. This demonstrates the strength of the residential values relative to commercial values.

3.6.4 Rateable values of retail properties are higher in Cheltenham than other Gloucestershire districts and the major cities of Birmingham and Bristol, but below other urban centres such as Bath, Cardiff and Oxford. Office rateable values are below many other centres outside of Gloucestershire.

3.6.5 A large share of workers in Cheltenham travel less than 5km from their home to workplace. Whilst traffic congestion on average across the district is no worse than the national average, a number of roads signal evidence of significant increases in congestion over recent years; A4013 northbound; A40 eastbound; A435 southbound; and A46 northbound.

3.7 Employment land and premises

3.7.1 Evidence compiled as part of the background work to the Cheltenham Plan largely reflects the results of previous economic / site studies undertaken in Cheltenham since 2007. Together they have presented a consistent view on the existing portfolio of sites and premises re-iterating market strengths but also key factors that need to be addressed. The issues identified by the reports and the new site analysis can be summarised as follows:

- Cheltenham has a large quantum of office space but is not enough to meet demand nor necessarily fit for purpose;
- The offer is mostly concentrated in small size office space in regency and older buildings (80 per cent are less than 500 sq. m);
- There is a continued lack of quality, A-grade office space, particularly in the Town Centre;
- The ongoing loss of B1 and A2 sites and premises to residential use has increased pressure on the remaining employment stock. This pressure will continue if regency stock proves to be equally attractive to the residential market in future;
- A number of structural weaknesses in the portfolio of available premises exist, particularly in terms of a lack of business / enterprise parks;
- There is limited business start-up space, particularly serviced and supported space for incubator or innovation development;
- Many existing industrial sites need upgrading to improve market attractiveness and offer. Upgraded sites will be likely to improve the Gross Value Added (GVA) performance and attractiveness to higher value manufacturing and engineering, finance and business services;
- There are a number of significant and important businesses on single occupier sites where there are constraints to the potential expansion of those businesses at that location;
- There are relatively low vacancy rates within industrial sites even though some developments are of average or poor quality. This could reflect the lack of availability of alternative premises;
- There is a significant proportion of ageing stock, particularly those premises that no longer meet modern business needs and single occupier sites that are adversely affected by amenity or access constraints;
- Older commercial sites with buildings that have been vacant for many years and with amenity and access constraints are not proving attractive to the market and will continue to be considered as potential residential sites instead;
- Those employment-related planning consents being implemented invariably involve losses of B1a land within the Town Centre whilst commitments to increase B1 space remain unimplemented;

- Policy needs to maximise the employment benefits of existing sites while other strategic sites are brought to the market over time.

Key issues arising

3.8 Overview

3.8.1 As part of the evaluation of the characteristics and trends affecting the economy in Cheltenham, it has been possible to draw certain conclusions which will influence the Cheltenham Plan's stance towards such matters moving forward. Many of these matters were summarised in the Issues and Options Report in 2015 and took account of consultation on the Local Plan Scoping Report in 2013, the finding of the Economic Strategy in 2015, and more recent engagement with local business leaders.

3.8.2 Whilst it is not intended to repeat all the information as part of this document, four key issues have emerged as requiring an appropriate response:

3.9 The need to achieve ambitions for growth

3.9.1 The Strategic Economic Plan (SEP) was submitted to the Government by the Gloucestershire Local Enterprise Partnership in 2014. It sets an ambitious growth target of 33,900 new jobs to be provided across Gloucestershire between 2015 and 2021. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) is similarly ambitious setting out a growth target of 39,500 new jobs to be provided in the JCS area between 2011 and 2031.

3.9.2 If the aspirations of the JCS and the SEP are to be fully realised, they will require significant uplift in economic performance and interventions which deliver the transformational change required. Both identify the need to market the attractiveness of Cheltenham and the excellent quality of life it offers. There are several factors and processes that could lead to economic growth and improved productivity. To achieve growth ambitions (with low productivity as the starting base), the economy will need to:

- i. employ more people (and have the capacity for more jobs); and/or
- ii. enhance productivity with investments in innovation, skills and capital; and /or
- iii. develop new markets / activities that are high value added.

3.10 The need to improve the profile of business within Cheltenham

3.10.1 There is a need to improve the profile of businesses and business issues within Cheltenham and the Council recognises the potential benefits in working with local businesses in this regard. There is currently a false perception that Cheltenham has very limited land available for employment so, in consequence, opportunities for the regeneration, conversion and re-purposing of existing sites and premises need to be promoted.

3.11 The strategic management of land, property and premises

3.11.1 Providing opportunity for growth and maintaining the quality of life and quality of place that make Cheltenham unique requires the strategic management of infrastructure and land assets. This will involve the active consideration of expansion needs of existing businesses and employers such as the need for specific types of sites and accommodation as well as consideration of business life cycle needs with respect to premises (such as space for business start-ups and premises for growing enterprises).

3.11.2 With the quality of Cheltenham's existing employment sites and premises needing to be improved, appropriate support for relocation of existing businesses to new, higher quality locations will sometimes include consideration of supporting uplift on values of existing sites to residential in order to release investment. However, it is also recognised that there is also a market for older and less valuable employment land as this will often be cheaper to rent.

3.12 Opportunities presented by the Cyber Security industry

3.12.1 Public and private sector cyber security activities are significant for Cheltenham and present unique opportunities in terms of high value jobs and activities. In particular, GCHQ presents opportunities to attract new private sector technology jobs and activities.

3.12.2 The area in and around Cheltenham, Great Malvern and Hereford is already recognised as a growing centre in the UK for the research, development and commercialisation of cyber security products and services. There are real opportunities from expanding activities in the cyber-security sector but also in any spin-off or associated ICT, digital and technology activities that may have a complementary use for the skills, specialisms and market contacts of the existing cyber security sector. The challenge will be to use the planning system to help nurture and support this potential.

3.13 Implications for the Cheltenham Plan

3.13.1 In terms of tackling the above issues, the Cheltenham Plan has a key role to play. For instance, whilst in strategic land use terms, the JCS is the lead strategy and has identified new sites to cater for some 39,500 jobs between 2011 and 2031, the Cheltenham Plan can complement those ambitions by helping to manage the need for further new allocations in future. The protection of existing land and premises from inappropriate changes of use is fundamental in this process.

3.13.2 The Plan is an important facilitator of change and is an integral component in raising awareness of the opportunities that are available for business in Cheltenham. Whilst it will achieve little on its own, by engaging with the private, public and community sectors and inviting input from a wide range of stakeholders as part of the plan preparation process, the Plan's strategy will complement relevant partner initiatives. Furthermore, it will help realise the land use implications of those initiatives with the aim of improving the business profile and economic wellbeing of the town.

3.13.3 By helping to ensure a good choice of land and premises is available to meet the demands of the market, the Plan can help ensure that more people are employed locally and that economic growth is facilitated. In addition, by targeting particular sectors that are considered high value added, it can further enhance opportunities for wealth generation.

3.13.4 These matters are considered in more detail as part of the economic strategy set out later in this document. However, they also informed the alternatives put forward as part of the Issues and Options consultation in June 2015. A summary of the responses to the Issues and Options are set out below together with the Council's assessment of the best way forward in each case.

Results Arising From Public Consultation on the Cheltenham Local Plan Issues & Options Report (June 2015)

3.14 You said

- 3.14.1 As part of the consultation on the Issues and Options Report in June 2015, a total of 3 policy approaches were advanced with each approach containing a number of policy options.
- 3.14.2 The first policy approach entailed **safeguarding existing and future employment land**. The majority of respondents who expressed a preference considered that **Option 3** represented the best way forward. This would entail protecting the best sites whilst recognising opportunities to re-use and redevelop sites that no longer meet the needs of business.
- 3.14.3 The second policy approach entailed **promoting one type of industry over another**. The majority of respondents who expressed a preference considered that **Option 4** represented the best solution. This would involve introducing the selective management of Cheltenham's economy and would take the form of policy intervention in the market to kick-start a cyber-security initiative by reserving employment land for those uses that have an essential need to locate close to GCHQ and other high technology ICT businesses.
- 3.14.4 The third policy approach entailed **promoting a cyber-security cluster** within the context of the area's growing importance as a centre for the research, development and commercialisation of cyber-security products and services. The majority of respondents who expressed a preference considered that **Option 6** represented the best way forward and that there would be benefits of following this approach in continuing to help diversify the local economy whilst taking advantage of one of the area's identified strengths. The views expressed in relation to this option also offer consistency with the opinions made in relation to the second policy approach above.

3.15 We've done

- 3.15.1 In taking the views of respondents into account, the Council has undertaken an evaluation of all existing business land in Cheltenham. This has included all active / functioning employment sites together with those sites which are currently unoccupied but where the last use was for employment purposes. As a result of this evaluation exercise and in conjunction with the evidence resulting from a variety of previous employment-related studies, particularly the 'Sites Typology' from the Cheltenham Employment Sites Review (2015), it has been possible to identify which sites should be protected for employment purposes and which sites can be considered for alternative uses, principally housing.
- 3.15.2 Arising from this, the Cheltenham local plan is putting forward a spatial strategy with associated land-use planning policies which reflect the intention to better manage the use of employment land in future whilst having regard to aspirations for growth and the inherent strengths that the Borough possesses. The strategy is founded on market analysis which has identified a strong requirement for town centre employment sites as well as edge of town opportunities for business.
- 3.15.3 The need to safeguard sites and premises in the identified areas partly arises from the fact that in recent years a considerable number of employment uses have been lost owing to changes of use. The changes that have occurred are mostly to residential use and have been justified on the grounds that sustainable housing

development is much needed in the Borough. However, the cumulative effect of these changes has been to reduce the overall amount of employment land available to the extent that greater efforts to facilitate the process of safeguarding have now become paramount.

3.15.4 Cheltenham still maintains a considerable amount of employment land overall but it is important that the land and premises available are suitable to meet the various needs of the market in terms of quantity, quality, deliverability and spatial distribution / location.

3.15.5 Following on from the above, the Council has further explored the possibility of land-use policy intervention that might help facilitate the selective management of the economy in order to create a cyber-security cluster. A specific policy has been formulated to reflect this and is set out below. The policy positively promotes the type of development the Council would like to see in Cheltenham and gives clear support to cyber security activities. This approach is similar to the approach that safeguards land for one use over another although it specifically recognises the importance of cyber security as business activity in the town and is aimed at taking advantage of the immediate opportunities that exist in fostering and further developing the knowledge and technology-based economy.

The Preferred Options

3.16 Safeguarding existing employment land

3.16.1 *We will introduce a land use strategy that appropriately safeguards existing employment land and buildings, and promotes cyber-security.*

3.16.2 The areas identified as containing key employment assets are shown on the Proposals Map. The sites contained within these areas are all considered to have realistic potential to make a significant contribution to delivering new jobs and increasing GVA / productivity over the plan period to 2031. As such, they are to be specifically safeguarded from changes to other forms of development with the associated policy taking a criteria-based approach to safeguarding key sites (see Policy EM1 below).

3.16.3 Those employment sites that were not considered to be key sites and which are therefore not delineated on the Proposals Map will be treated in one of two ways:

- Some will continue to be safeguarded for employment through a policy that embodies greater flexibility than that which applies to the areas containing key employment assets (see Policy EM2 below).
- A very small number have been considered for alternative uses and are being advanced with more appropriate / deliverable allocations as part of the Preferred Options.

3.17 Promoting cyber-security

3.17.1 The National Planning Policy Framework supports local authorities to plan positively for the location, promotion and expansion of cluster networks of knowledge driven, creative or high technology industries. Within this context, and given the significant opportunities presented by the cyber-security sector in Cheltenham, it is considered imperative that the Council should look to support a growing and high technology global industry in the area. Whilst a successful approach will require intervention and coordination across a number of policy areas, appropriate land-use planning will be

integral to the success of any coherent strategy. In this way, planning can be used as one of the primary vehicles for facilitating the positive change that is required and, specifically, it would help steer the implementation of a wider cyber-security business initiative.

- 3.17.2 Consequently, it is proposed to introduce a policy (see Policy EM4 below) which positively promotes the location of appropriate businesses to Cheltenham. The policy is designed to take advantage of the immediate opportunities that are known to exist in terms of GCHQ and its supply chain, but also to provide suitable sites and premises for new and expanding suppliers or new or existing SMEs in this cluster.

3.18 Discounted Options

- 3.18.1 The following options from the Cheltenham Local Plan Issues and Options Report (June 2015) have been discounted from the remainder of the plan preparation process for the reasons identified under each of the headings below.

Option 1 – Continue with general protection of office, industrial and storage space (B uses only) as established by adopted Local Plan Policy EM2.

- 3.18.2 Existing policy sets out to prevent the loss of office, industrial and storage space on existing sites using a range of criteria. These criteria currently restrict the change of use of land and buildings in existing employment use to a use outside B1, B2 or B8 use class except where the continuation of the use is undesirable on traffic, amenity or environmental grounds, or where there is a demonstrable lack of demand for employment use currently or in the future.

- 3.18.3 Whilst the policy has been partially successful in achieving what was intended back in 2006, there has been a change in the structure of the economy since that time and evidence suggests that there is now a disconnect between the loss of traditional employment land and the supply of local jobs. The Council is aware that whilst the number of jobs has increased in Cheltenham over the last 10 years, there have been losses of employment sites over that time, and that if this trend is allowed to continue, it could pose a significant problem in future. Continued protection of office, industrial and storage space remains essential but a more targeted approach is seen as the way forward to increase the effectiveness of policy overall. Two policies, both based on previous adopted Local Plan Policy EM2, are now being advanced.

Option 2 – Amend the approach to the protection of office, industrial and storage space (B uses only) as established by adopted Local Plan Policy EM2.

- 3.18.4 As outlined above, a review of existing policy is both timely and necessary; therefore, this document introduces two policies for the way in which employment land should be managed depending on where in the Borough each site or property is located. In each case, the principal structure of the original Policy EM2 is maintained but the wording is amended with a particular emphasis being introduced according to the sites and locations concerned.

- 3.18.5 Key employment assets have been identified and a tighter policy has been introduced to provide greater safeguards to traditional B1, B2 and B8 land, reducing the number of circumstances that may allow a change of use to occur. Aside from the key sites, employment land is still considered important and will continue to be safeguarded for employment uses in future. However there is a greater degree of flexibility on these sites and changes away from traditional employment uses will be allowed in certain circumstances.

3.18.6 In essence, Option 2 has not been entirely discounted and the policies that have evolved in this Preferred Options document owe much to the principles embodied in the policy approach of the 2006 Plan. Nevertheless, a more radical approach has been necessary to help address some of the key employment-related trends that have been identified so that Cheltenham's planning policy approach remains fit for purpose in years to come.

Option 5 – Do not use policy for the selective management of the economy.

3.18.7 The Preferred Options for the Cheltenham Local Plan entails putting in place a land use strategy that helps facilitate the selective management of the economy in order to:

- address the incremental loss of employment land and premises to other uses; and
- promote land for the use of key sectors that already have a strong foothold in the area and which, with further encouragement, will likely deliver additional economic growth and wealth creation for the town and its inhabitants.

3.18.8 The policy approach is clearly designed to intervene in the market, and in terms of the promotion of land for key sectors, offers a departure from previous employment policies in Cheltenham in order to help achieve the Council's aspirations for GVA growth. Without such selective management of the economy, it is considered that the incremental loss of employment land to other uses may continue and the potential value / opportunities presented by key sectors will be forfeited to other geographical areas nearby.

3.18.9 Land supply in Cheltenham is limited and without a new policy approach to help steer economic growth, there is a risk that there would be insufficient land available for all employment types in the area in future. By retaining the existing framework, specialist companies might be priced out of the market by more generic and potentially higher value uses instead.

3.18.10 There was little support for this option during public consultation on the Issues and Options. The Council considers there is sufficient evidence to demonstrate a reasonable prospect of sites being used for their intended purpose and that the suite of proposed employment policies combined offers a good degree of flexibility as well as a more creative approach to the way in which employment land is managed.

Option 7 - Do not promote a cyber-security cluster.

3.18.11 The option not to promote a cyber-security cluster received little support during public consultation on the Issues and Options. This potentially reflects the fact that without this form of intervention, Cheltenham could miss out on the wealth and productivity that is often generated by such industries with these desirable characteristics passing to neighbouring areas, particularly Great Malvern and Worcestershire.

3.18.12 There is a risk that if the cluster area is inappropriately drawn or if the proposed policy is poorly applied it might hinder other industries from locating and expanding in Cheltenham. However, the Local Plan is making concerted efforts to ensure a ready and consistent supply of suitable employment land which caters for the needs of all business sectors over the plan period. The promotion of a cyber-security cluster is seen as an integral part of that overall approach and the policy and designation are intended as enabling tools that build on some of the town's most significant strengths and opportunities.

4 THE ECONOMIC STRATEGY OF THE PLAN

Background

4.1 A joint approach

- 4.1.1 It is vital to ensure that Cheltenham has sufficient capacity to support economic growth in future and to ensure that local residents have access to a good supply of jobs.
- 4.1.2 The overall Economic Strategy for the area depends on a variety of sub-strategies coming together and a number of parties working together to achieve common goals. The Local Plan, though at the centre of the drive to realise the wider economic aims for Cheltenham cannot achieve all those aims on its own. Success will very much depend on a consistent and coordinated approach to delivery from a range of organisations. To this end, the Council will actively engage with the private, public and community sectors including the Cheltenham Business Improvement District, Cheltenham Development Taskforce, Cheltenham Chamber of Commerce, Gloucestershire County Council and Gloucestershire Local Enterprise Partnership to promote and improve the economic well-being of the town and Borough. This will be supported by the emerging place strategy, currently being prepared by the Council in partnership with stakeholders and the wider communities of the Borough.

4.2 The need to secure employment land

- 4.2.1 Employment is now considered in a wider sense than traditional office (B1), industrial (B2) and warehousing (B8) use classes. Uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care can also be large employment providers.
- 4.2.2 Indeed, the Cheltenham Economic Strategy (2015) suggests that approximately two thirds of new jobs in the JCS area will be created in sectors not normally associated with traditional employment land use. The economy will therefore need a flexible supply of land that is responsive to the changing needs of the market.
- 4.2.3 Nevertheless, whilst 'non-B employment uses' are now an important contributor to the economy, it should be made clear that they do not fall to be considered in Part 1 of the Cheltenham Plan but will be addressed in Part 2 of the Plan instead. Additionally, an immediate review of retail policies across the JCS authorities will be carried out once the JCS is formally adopted.
- 4.2.4 The consideration of employment land requirements undertaken as part of the Assessment of Updated Economic Forecasts for the Gloucester, Cheltenham and Tewkesbury JCS in 2014 concluded that between 34ha and 60ha of B class employment land would be required across the JCS-wide area between 2011 and 2031 to meet anticipated employment requirements.
- 4.2.5 Figures advanced by the Gloucestershire Local Enterprise Partnership through the Strategic Economic Plan in 2014 set an ambitious job growth target of 33,900 new jobs to be provided between 2015 and 2021 for Gloucestershire.
- 4.2.6 By way of Policy SP1, the JCS makes provision to support 39,500 new jobs between 2011 and 2031 across three neighbouring authorities. This level of provision is

challenging but will help to provide choice and a degree of flexibility to the market in future. JCS strategic allocations through urban extensions at West Cheltenham and North West Cheltenham make significant contributions to overall provision both in terms of housing and employment land.

4.2.7 In considering the need to secure new employment land, the Cheltenham Plan has had regard to the aforementioned progress made through the JCS process and the results of the latest Strategic Assessment of Land Availability which considered the capacity for new development within the Principal Urban Area (PUA) of Cheltenham.

4.2.8 As a result, it is proposed only to make a small number of allocations for employment in the Cheltenham Plan. The emphasis of the economic strategy of the Plan is to look at protecting existing sites and premises instead. Such sites will significantly assist in providing the land supply necessary to help support economic growth and secure the continuing presence of valuable employment assets. By protecting the existing employment land resource, the need to allocate additional employment land is reduced and the value of previous infrastructure investment is retained.

4.3 Strategy elements

4.3.1 The Cheltenham Local Plan is putting forward a strategy which is intended to better manage the use of employment land in future whilst having regard to the aspirations for growth and the identified strengths that have been identified to exist within the Borough. In land use terms, two primary strands have emerged from the key issues identified as having implications for Cheltenham, these are:

- the need to appropriately manage the use of land and premises, and
- the need to maximise the opportunities presented by the Cyber Security industry.

4.3.2 Through a variety of consultation mechanisms these primary strands reflect the findings of various economic studies, the opinions of local business leaders, and the views of the general public. Each strategy element is considered further below:

4.4 Appropriately managing land and premises through safeguarding existing employment land and buildings

4.4.1 The Employment Land review undertaken as part of the development of the Economic Strategy indicates that there continues to be a finite land resource available for the development of new employment sites in the Principal Urban Area. In order to help achieve the Strategic Economic Plan and Joint Core Strategy ambitions for job provision, the Cheltenham Plan must try to address this whilst also considering the needs of competing land uses, principally residential.

4.4.2 The historical incremental loss of business land and premises to other uses in the PUA though legitimate and allowed by previous adopted local plan policy has been accelerated by Permitted Development Rights which give the Council less control over the changes of use that can legally occur without the need to gain consent.

4.4.3 Estimates covering the last two decades consider that between 750,000 and 1,000,000 sq. ft. of office space have been lost from Cheltenham. Whilst this is not a problem unique to the town, and may owe much to globalisation and the downgrading of the regional HQ market, it remains a significant issue that the Borough needs to respond to.

- 4.4.4 A situation is now presented whereby a more radical policy approach is required if sufficient and appropriate land is to be available for employment purposes and Cheltenham's growth aspirations are to be realised in future.

Preferred Options

4.5 Key Employment Land

- 4.5.1 The Council will seek to ensure that the best, most versatile employment land, defined as Key Employment Land on the Local Plan Proposals Map, will remain available for B1, B2 and B8 employment uses and not eroded for other uses.

- 4.5.2 These sites are recognised as having the potential to make a significant contribution to the aim of delivering new jobs and increasing GVA / productivity in Cheltenham over the Plan Period and would assist in meeting the aspirations for growth set out in the Strategic Economic Plan. The list of sites is included in Policy EM1 and its supporting text, the latter also includes a summary analysis of each site's characteristics. The site assessments that led to key employment land being identified are included at Appendix 1.

- 4.5.3 A site's designation as a key site is based on one or more of a variety of factors and, to this end, identified sites can exhibit a range of differing characteristics. The following have considered first and foremost:

- Whether the character of the site is predominantly traditional employment-based (use classes B1/B2/B8);
- The location of the site in terms of its strategic and local accessibility;
- Access to the site by public transport;
- The proximity of community facilities to help support the workforce;
- The size of the site and its capacity for expansion in future;
- Whether there is currently a limited supply of such premises / accommodation across the Borough;
- Whether there is market demand / requirements for such locations;
- The lack of constraints (physical or otherwise) to unhindered continued use, or future expansion.

- 4.5.4 By identifying key sites in this way, it is intended that the Cheltenham Plan will provide a more refined and focussed approach to facilitating economic growth than before, and that by protecting such sites, the Plan will help ensure a more balanced economic strategy which simultaneously helps to capitalise on key areas such as the recent rapid growth in demand for serviced office accommodation.

- 4.5.5 To not follow such an approach would risk causing further loss of high quality business and enterprise parks and premium grade offices and would delay the Plan's ability to meet the needs of business. The resulting lack of employment space in sustainable locations could result in increased car use as businesses are forced to locate to offices outside the town, thus negatively impacting the local economy.

4.6 Spatial characteristics

- 4.6.1 It will be noted that the distribution pattern of key employment sites possesses a strong spatial dimension whereby there is a greater concentration of sites towards the west of Cheltenham, particularly along the A4019 and the A40. The area benefits from very good strategic access, being close to the M5 motorway and with good

connections to Junctions 10 and 11. Whilst Junction 10 is still constrained through being two-way rather than four-way, sites in the west of Cheltenham would stand to benefit further should investment be forthcoming to facilitate junction improvement works in future. The Council is committed to keep the pressure of lobbying to influence an all movement M5 junction 10. The economic strategy as set out in this plan will support that activity.

- 4.6.2 The strategic position of these sites, their good accessibility, and their attractiveness to the market have all been influential in determining their identification as containing key employment land. The resulting spatial dimension dovetails with the vision and associated land-use strategy of the JCS whereby there is a clear preference for capitalising on development opportunities in the west through strategic land allocations in proximity to appropriate infrastructure and employers offering high value jobs and services.
- 4.6.3 On Key Employment Land, a change of use will be permitted for sui generis uses exhibiting characteristics of traditional employment uses (B1, B2, B8) or for uses that provide new, highly skilled jobs or high value added activities such as research and education.
- 4.6.4 The following policy reflects the approach to safeguarding key existing employment land in Cheltenham. In addition to the existing employment sites identified, it is intended that key employment land includes a small number of new employment allocations being made under Policy EM3 of the Cheltenham Plan together with those strategic employment allocations at West Cheltenham and North West Cheltenham being made as part of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy when development at each of those locations is completed.

**Proposed Policy EM1
SAFEGUARDING KEY EXISTING EMPLOYMENT LAND AND BUILDINGS**

The following sites which are delineated on the Local Plan Proposals Map have been identified as containing key employment land to be safeguarded for employment purposes:

1. Runnings Road (Kingsditch Trading Estate, Block 1 & Blocks 5-7)
2. Gloucester Road, Benhall (GCHQ)
3. Jessop Avenue / St. James Square
4. New Barn Lane (UCAS)
5. Tewkesbury Road (Block 1)
6. Cheltenham Trade Park
7. Hatherley Lane (The Reddings)

Development proposals for a change of use of land and buildings currently or last in employment use (note 1) on key existing employment sites will not be permitted except where:

- a) The proposed use is Sui Generis but exhibits characteristics of traditional B1, B2 or B8 employment uses (note 2); or
- b) The proposed use provides new high-skilled jobs such as those associated with knowledge-based service and technology industries.

New employment allocations made under Policy EM3 of the Cheltenham Local Plan and new strategic employment allocations made as part of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, namely, land at West Cheltenham and land at North West Cheltenham will also be safeguarded by Policy EM1 on completion of development.

Note 1: Employment use means B class employment uses together with those Sui Generis uses that exhibit characteristics of traditional B1, B2, B8 uses such as car sales, a builder's yard, or a vehicle or tool hire business. The list is not exhaustive.

Note 2: Sui generis uses which may require an employment location are the same as those listed at note 1, although the list is not exhaustive.

TABLE 1: SITES DESIGNATED AS KEY EMPLOYMENT SITES

Site ref.	Site name / address	Key characteristics	Predominant character	Size (ha)
ES1 (Survey refs. 8, 12-14)	Runnings Road - Kingsditch Trading Estate Block 1 & Blocks 5-7	<ul style="list-style-type: none"> • Principal industrial area to north-west of Cheltenham • Good access onto A4019 & M5 J10. • Wholesale; light industrial; engineering; manufacturing. • Mixed quality buildings with investment reqd. in certain buildings to ensure continued fitness for purpose. • Some poor public realm. • Some sites at low density with opportunities for redevelopment / investment. 	Industrial Estate	28.4

TABLE 1: SITES DESIGNATED AS KEY EMPLOYMENT SITES

Site ref.	Site name / address	Key characteristics	Predominant character	Size (ha)
		<ul style="list-style-type: none"> High profile development where any vacancies on key gateway plots would cause the profile of the estate to deteriorate. 		
ES2 (Survey ref. 75)	Gloucester Road, Benhall – GCHQ	<ul style="list-style-type: none"> Located to the west of town Excellent strategic location off A40 / close to M5 J11 Good local access off Gloucester Rd. / Hatherley Lane Good level of parking Very high quality office accommodation with excellent surroundings Bespoke buildings occupied by a specific user since 2004. Large employer and important contributor to local economy Considered a key business in Borough which needs to be retained to avoid vacating the whole site. 	Large Site / Single Occupier	19.5
ES3 (Survey refs. 44 & 67)	Jessop Avenue / St James Square	<ul style="list-style-type: none"> Substantial prime office space in Cheltenham Town Centre. Refurbished buildings suitable for blue chip companies. Expansion opportunities to implement extant planning consent on adjacent car park at Honeybourne Place. Good access by public transport Close to many local facilities for workforce. 	High Quality Office (Town Centre)	2.6
ES4 (Survey ref. 65)	UCAS – New Barn Lane	<ul style="list-style-type: none"> Located in northern Cheltenham Good strategic access off A435 Good local access to / from Evesham Road Buildings of excellent quality Situated in a high quality landscaped environment. Some buildings given over to student accommodation in recent times. Still considered an important business in Borough which needs to be retained to avoid vacating the whole site. 	Large Site / Single Occupier	2.7
ES5 (Survey ref. 29)	Tewkesbury Road (Block 1), Neptune Business Centre & Space Business Centre	<ul style="list-style-type: none"> Located on north-western edge of Town Centre Good strategic access off A4019, 3 miles from M5 Good local access, well served by public transport. Adequate parking Good, modern office space, warehouse and trade counter Offers a flexible range of unit sizes along with bespoke packages to support occupiers' requirements. Supports 26 businesses including start-ups and small businesses Facilities nearby for workforce 	Business Park / small businesses	2.6
ES6 (Survey ref. 4)	Cheltenham Trade Park	<ul style="list-style-type: none"> Located on north-western edge of Town Centre Good strategic access off A4019, 3 miles from M5 Acceptable local access via residential roads (e.g. Arle Avenue) Well served by public transport 	Business Park	4.4

TABLE 1: SITES DESIGNATED AS KEY EMPLOYMENT SITES

Site ref.	Site name / address	Key characteristics	Predominant character	Size (ha)
		<ul style="list-style-type: none"> • Adequate parking • Office and light industrial location providing a range of units and two office buildings. • Some vacant units available. 		
ES7 (Survey ref. 22)	Hatherley Lane - The Reddings	<ul style="list-style-type: none"> • 2 sites located to the west of the town • Excellent strategic location off A40 / close to M5 J11 • Good local access off Gloucester Rd. / Hatherley Lane • Good level of parking • Good quality / modern properties • Adequate public transport • Some nearby facilities for workforce • Expansion opportunities available south and west of Pure office building • Limited public transport 	Business Estate	2.8

- *The policy contributes to Vision Theme B – objectives a, b and e.*
- *Relevant JCS policies: SD1; SD2*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: EM2*

<p>Links to key local evidence:</p> <ul style="list-style-type: none"> • Cheltenham Economic Strategy (2015) • Strategic Assessment of Land Availability (2015) • Annual Employment Land Monitoring Report (2015) • Gloucestershire Growth Deal (2014) • Gfirst Strategic Economic Plan (2013) • NLP Assessment of updated economic forecasts (2014) • JCS Review of Business Parks (2011) • Employment Land Review (2007 and 2011)

4.7 Employment outside of key existing employment sites

4.7.1 Land and purpose-built premises currently or last in employment use but not identified as Key Existing Employment Sites will also be safeguarded for a range of employment and job-generating uses such as offices, industrial, warehousing, leisure, education, research, health services, and tourism facilities. The list is not exhaustive and where an applicant can demonstrate another use is job generating this will be assessed on its own individual merits.

4.7.2 Where the use falls outside B1/B2/B8, the proposed job generating use should be the primary activity and proposals will need to demonstrate how the redevelopment contributes to net increase in jobs available or adds value to the local economy. Proposals for retail will need to comply with relevant retail policies.

4.7.3 A sequential approach is taken to the redevelopment of non-designated employment sites. Re-development of the site for non-employment development will only be

allowed if it can be demonstrated that, firstly, employment or job generating based redevelopment, and secondly, mixed-use development generating some employment is not viable.

- 4.7.4 Exceptions to the policy may be permitted where continuation of the existing use is undesirable on traffic, amenity or environmental grounds, or there is a demonstrable lack of demand for employment use, currently or in future.
- 4.7.5 The following policy reflects the approach to safeguarding non-designated employment sites in Cheltenham.

Proposed Policy EM2

SAFEGUARDING NON-DESIGNATED EXISTING EMPLOYMENT LAND AND BUILDINGS

Development proposals for a change of use of land and buildings currently or last in employment use (note 1) will only be permitted where the loss of part of the site to other uses does not have a detrimental impact on the continuing operation of existing businesses and;

- a) The proposed use is job generating (note 2) with any loss of existing provision being offset by a net gain in the quality (note 3) and / or the number of jobs provided on the site; or
- b) Development of the site will ensure the relocation of an existing firm to a more suitable location within the Borough (note 4); or
- c) There has been a sustained and long-term absence of economic activity on the land with no reasonable prospect of the land being used for employment (note 5);

or

- d) The applicant for planning permission can demonstrate that employment use creates unacceptable environmental or traffic problems which cannot be satisfactorily resolved.

Proposals for the redevelopment of non-designated employment sites will need to consider matters of viability in demonstrating adherence to the following sequential approach in order of preference:

- 1) Traditional B class employment-based redevelopment
- 2) Job generating redevelopment (note 2)
- 3) Mixed use redevelopment including traditional B class employment uses
- 4) Mixed use redevelopment including job generating uses (note 2)
- 5) Non-employment redevelopment

Note 1: Employment use means B class employment uses together with those Sui Generis uses that exhibit characteristics of traditional B1, B2, B8 uses such as car sales, a builder's yard, or a vehicle or tool hire business. The list is not exhaustive.

Note 2: Job generating uses include retail, leisure facilities, education, health services, residential care and tourism. This list is not exhaustive and other uses may

also be relevant. Proposals for retail uses will also need to comply with the sequential test and the Plan's retail policies. Short term jobs generated through the construction or maintenance of buildings as part of a planning permission do not constitute job generating uses for the purposes of this policy.

Note 3: Quality jobs may include knowledge-based service and technology jobs such as cyber-security and ICT / digital industries; manufacturing and engineering; jobs in professional services such as insurance; and visitor economy jobs that help increase spend in Cheltenham. This list is not exhaustive and other uses may also be relevant.

Note 4: Evidence will be required to demonstrate why the existing site is unsuitable for the current use, why the alternative site is more suitable and why other uses are considered necessary in order to facilitate the relocation of the current user elsewhere within the Borough.

Note 5: Evidence will be required to demonstrate the lack of demand and consider the need for employment land currently or in future. At the heart of the criterion is the need to undertake an active advertising and marketing campaign that has been sustained over an appropriate period of time and has had regard to market characteristics. The campaign should cover both sale and rent/lease of the site and should be targeted at the resumption of the previous employment use or another B class or job generating use. The amount of time that a campaign should be carried out is likely to vary depending on the scale of the redevelopment proposed and the amount of employment land that will potentially be lost. A period of not less than 1 year provides a reasonable benchmark.

- *The policy contributes to objectives Vision Theme B – objectives a, b, and e.*
- *Relevant JCS policies: SD1; SD2*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: EM2*

Links to key local evidence:

- Cheltenham Economic Strategy (2015)
- Strategic Assessment of Land Availability (2015)
- Annual Employment Land Monitoring Report (2015)
- Gloucestershire Growth Deal (2014)
- Gfirst Strategic Economic Plan (2013)
- NLP Assessment of updated economic forecasts (2014)
- JCS Review of Business Parks (2011)
- Employment Land Review (2007 and 2011)

4.8 New employment development

4.8.1 Though the emphasis of the Cheltenham Plan's employment strategy is to safeguard relevant sites and premises from inappropriate changes of use, the Plan is also making a small number of employment allocations within the Principal Urban Area. In this way, it is intended to provide further certainty on where traditional B class employment activities will be concentrated whilst also providing a greater degree of choice and flexibility to the market.

- 4.8.2 Each of these employment allocations is considered to be a key employment site and upon completion of built development will be safeguarded from inappropriate changes of use by Policy EM1. It is also intended that land within Cheltenham Borough that is subject to the strategic employment allocations made through the emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, namely, land at West Cheltenham and land at North West Cheltenham will be safeguarded by Policy EM1 on completion of development.

Jessop Avenue (E1)

- 4.8.3 The site comprises a flat parcel of land located to the south of Jessop Avenue on the western edge of Cheltenham Town Centre. The allocation occupies a cleared area of approximately 0.34 ha which is currently used as a temporary private car park to adjacent offices; it can therefore be considered as brownfield land. The site benefited from the granting of planning consent for office and ancillary uses in 2012 but the development stalled. A further application for a bespoke office development was approved on the 20th October 2016 (16/01417).

Hatherley Lane (E2)

- 4.8.4 The site is a flat parcel of land located to the south of Hatherley Lane, The Reddings on the western periphery of Cheltenham. It lies to the west of the existing Pure Offices serviced business accommodation and is extremely well connected to the strategic highway network via the A40 and J11 of the M5. Measuring approximately 0.4 ha, the allocation offers an ideal opportunity for the expansion of contemporary business activities. An adjoining site has recently been granted planning permission at appeal for 27 dwellings (APP/B1605/W/16/3152390). The allocation site, which can be categorised as brownfield land, has previously been used for employment purposes and gained planning permission for office use as part of a larger site in 2010.

Grovefield Way (E3)

- 4.8.5 The site occupies a flat parcel of land to the north-west of Grovefield Way, The Reddings on the western periphery of Cheltenham. It lies immediately west of the Gloucestershire County Council Park & Ride facility at Arle Court and is extremely well connected to the strategic highway network along the A40 and to J11 of the M5. Measuring approximately 6.4ha, the allocation provides an opportunity for the establishment of a modern business environment at an important gateway location. The site can be categorised as greenfield land and currently lies within the green belt. However, it also currently benefits from an extant planning consent for B1 employment uses and part of the site is already under construction to provide a flagship facility for a high profile car dealership. It is anticipated that the existing green belt designation will be removed by the ongoing JCS process.
- 4.8.6 The development or change of use of land for new employment uses at locations not specifically covered by the Cheltenham Plan will be permitted where the proposals

accord with Policies SD1 and SD2 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (2016).

**Proposed Policy EM3
NEW EMPLOYMENT ALLOCATIONS**

The following sites which are delineated on the Local Plan Proposals Map have been identified as locations for new employment development:

- a) Land south of Jessop Avenue, Town Centre (E1)
- b) Land south of Hatherley Lane, The Reddings (E2)
- c) Land north-west of Grovefield Way, The Reddings (E3)

Proposals for traditional B class employment uses or Sui Generis uses that exhibit the characteristics of traditional B class employment will be supported at these locations subject to being in accord with other relevant policies within this Plan.

TABLE 2: SITES ALLOCATED FOR EMPLOYMENT

Site ref.	Site name / address	Description	Size (ha)
E1	Jessop Avenue	<ul style="list-style-type: none"> • Flat parcel of land located on the western edge of Cheltenham Town Centre. • Currently used as private car park. • Planning consent granted for office and ancillary uses in 2012. • A further application for a bespoke office development was approved on the 20th October 2016 (16/01417). 	0.34
E2	Hatherley Lane	<ul style="list-style-type: none"> • Flat parcel of land located on the western periphery of Cheltenham. • Adjacent to existing offices. • Well connected to the strategic highway network via the A40 and J11 of the M5. • The site is brownfield land has previously been used for employment purposes. • Planning permission was granted for office use as part of a larger site. 	0.4
E3	Grovefield Way	<ul style="list-style-type: none"> • Flat parcel of land on the western periphery of Cheltenham. • Well connected to the strategic highway network along the A40 and to J11 of the M5. • The site provides an opportunity for the establishment of a modern business environment at an important gateway location. • The site has an extant planning consent for B1 employment uses and part of the site is already under construction. • It is anticipated that the existing Green Belt designation will be removed by the ongoing JCS process. 	6.40

- *The policy contributes to objectives Vision Theme B – objectives a, b, and e.*
- *Relevant JCS policies: SD1; SD2*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: EM2*

Links to key local evidence:

- Cheltenham Economic Strategy (2015)
- Strategic Assessment of Land Availability (2015)
- Annual Employment Land Monitoring Report (2015)
- Gloucestershire Growth Deal (2014)
- Gfirst Strategic Economic Plan (2013)
- NLP Assessment of updated economic forecasts (2014)
- JCS Review of Business Parks (2011)
- Employment Land Review (2007 and 2011)

4.9 Maximising opportunities presented by the cyber security industry

- 4.9.1 Public and private sector cyber security activities are significant for Cheltenham and present unique opportunities in terms of high value jobs and activities.
- 4.9.2 The area is recognised as a growing centre in the UK for research, development and commercialisation of cyber security products and services. The Council recognises there are real opportunities from expanding the cyber security sector, but also in any spin-off or associated ICT, digital and technology activities that may have a complementary use for the skills, specialisms and market contacts of the sector.
- 4.9.3 The planning system has a role to play in helping to nurture and support this potential and the Cheltenham Plan includes a policy that is designed to look favourably on businesses wishing to locate or develop within the Borough. The policy represents a form of intervention in the market to encourage those uses that have an essential need to locate close to establishments such as GCHQ and represents a step forward from previous employment policy in that it should help focus Cheltenham's economy towards a specialist sector and therefore help achieve aspirations for GVA growth.
- 4.9.4 The policy is broad in its approach and does not set out to specifically allocate individual sites and premises; to do so may inadvertently prejudice other employment uses and may prevent existing, ageing, and sub-standard premises from being redeveloped. Rather, the approach is to support a growing high-technology global industry to locate to the town and to help brand Cheltenham as a premier location for cyber security innovation and business in the UK and to help provide a physical identity.
- 4.9.5 The success of any cyber-security initiative will require coordinated action between the Council, property developers and other sectors of the business community. However, through the following policy, the Cheltenham Plan aims to move the initiative forward being one of the primary facilitators of change.

Proposed Policy EM4
PROMOTING THE CYBER-SECURITY SECTOR

In order to further develop and enhance Cheltenham's position as a premier location for cyber security, innovation and business in the UK, development proposals for businesses that support cyber security activities will be favoured subject to the proposal being appropriate to the location concerned and being in-accord with other relevant policies within this Plan.

- *The policy contributes to achieving objectives Vision Theme B – objectives a, b and e.*
- *Relevant JCS policies: SD1; SD2*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: EM2*

Links to key local evidence:

- Cheltenham Economic Strategy (2015)
- Strategic Assessment of Land Availability (2015)
- Annual Employment Land Monitoring Report (2015)
- Gloucestershire Growth Deal (2014)
- Gfirst Strategic Economic Plan (2013)
- NLP Assessment of updated economic forecasts (2014)
- JCS Review of Business Parks (2011)
- Employment Land Review (2007 and 2011)

4.10 Safeguarding other land for the future: Route of the former Honeybourne Rail Line

4.10.1 In addition to safeguarding the Borough's employment sites, the Cheltenham Plan has also considered the need to protect certain infrastructure where it has the potential to help deliver economic and other benefits in future. In this respect, the Plan will protect the route of the former Honeybourne rail line where it falls within the Borough boundary.

4.10.2 It has long been recognised that the route has potential for future use as a continuous sustainable transport corridor linking the population centres of Bishop's Cleeve, Cheltenham, Gloucester, and Quedgley. The aim of the following policy will therefore be to safeguard that part of the route that lies within the Cheltenham Borough boundary from development which might prejudice this potential.

4.10.3 Sections of the redundant railway have already been brought back into beneficial use as a footpath and cycleway, and some of the route is operated as a heritage attraction by the Gloucestershire & Warwickshire Railway. The safeguarding

designation as shown on the Proposals Map includes these sections as well as those sections where proposals have yet to be implemented.

4.10.4 It is anticipated that in the interests of long-term, coherent planning, neighbouring Councils will include similar safeguarding proposals for the route in their local plans. The result will be to provide a fully co-ordinated approach to strategic land management in order to secure economic and other benefits through improved access to key settlements.

Proposed Policy EM5

PROTECTING THE ROUTE OF THE FORMER HONEYBOURNE RAIL LINE

The route of the former Honeybourne Rail Line is delineated on the Local Plan Proposals Map. Development proposals which would prejudice the future use of the route as continuous sustainable transport corridor will not be permitted.

- *The policy contributes to achieving objectives Vision Theme A - objective f; Vision Theme B – objective d; Vision Theme C – objectives a and e.*
- *Relevant JCS policies: SD1; SD2*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: PR3 and RC9*

Links to key local evidence:

- Cheltenham Economic Strategy (2015)
- Strategic Assessment of Land Availability (2015)
- Annual Employment Land Monitoring Report (2015)
- Gloucestershire Growth Deal (2014)
- Gfirst Strategic Economic Plan (2013)
- NLP Assessment of updated economic forecasts (2014)
- JCS Review of Business Parks (2011)
- Employment Land Review (2007 and 2011)

5 LOCAL GREEN SPACE

5.1 Background

- 5.1.1 The NPPF (para 76-78) makes provision for local communities to identify green areas of particular importance to those communities, where development will not be permitted except in very special circumstances. These Local Green Spaces (LGS) can be designated through a local plan or through neighbourhood plans. The LGS designation will be an addition to the current protections for green spaces set out in the 2006 Local Plan and Development on Garden Land & Infill Sites Supplementary Planning Document (SPD). Existing policies which protect public and private green spaces will remain in place and will continue to be taken very seriously.
- 5.1.2 In response to the introduction of the new Local Green Space designation outlined in the NPPF, Cheltenham Borough Council commissioned Gloucestershire Rural Community Council (GRCC) to work with parishes and community groups within the Borough on a Local Green Spaces Study. The aim of the work was to support communities to identify and analyse potential Local Green Spaces to be considered for designation through the emerging Cheltenham Plan.
- 5.1.3 GRCC visited Parish Councils and Neighbourhood and Community groups to get their feedback on green areas in their locality that are of particular importance to local communities. To facilitate this, the Council provided a toolkit that supported communities to evaluate the merits of proposing green areas for Local Green Space, and gave them a guide to relevant evidence they could submit.
- 5.1.4 Over 110 open spaces/sites were considered by the communities at initial assessment stage and 29 of these were taken forward to full toolkit application. Communities considered factors such as threat of development, current level of protection, usage and whether, in the time available, it would be possible to demonstrate that a site was special to the local community.
- 5.1.5 The 29 sites were included in the 2015 Issues and Options consultation and feedback from that consultation have been taken into account. Following the consultation the evidence provided by communities has been assessed further by officers. This included also assessing at the current development status of the sites (for example if the site was already allocated for development or had been included in the Strategic Assessment of Land Availability (SALA)) and their accordance with the criteria laid out in the NPPF. It was considered that 12 sites met the criteria for Local Green Space designation. These are listed in the policy below and are illustrated on the following maps. The potential Local Green Space sites at Swindon Village and Leckhampton have been considered through the JCS but also appear below because they will be part of the Cheltenham Plan.
- 5.1.6 It is important to note that sites which do not gain Local Green Space designation will continue to benefit from existing policies on the protection of open space. For

example, policy GE1 Public Green Space and GE2 Private Green Space in the 2006 Local Plan will remain in force. GE1 protects any area identified as Public Green Space from development. GE2 prevents development on all other green spaces that make a significant contribution towards townscape or the environment. There will be a review of Cheltenham's green spaces policies in Part 2 of the Cheltenham Plan (work on this is due to commence in summer 2017). At that point there will be a number of opportunities to comment on how green spaces in the town should be best protected and enhanced.

The NPPF provides the following criteria for Local Green Space designation. More details of how the criteria were applied can be found in Appendix B.

- The green space should be in reasonably close proximity to the community it serves.
- The green space should be 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.
- The green space should be local in character and is not an extensive tract of land.
- The green space does not have planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.
- Designation of the Local Green Space is consistent with local planning for sustainable development in the area.
- If land is already protected by Green Belt policy or any other designation then the green space designation provides local benefit additional to that already provided by the existing designation (for example where the Green Belt in a certain location has been identified in the JCS as having potential for review in the future).

5.2 You said

5.2.1 The consultation on the 2015 Issues & Options Consultation proposed three potential policy approaches for Local Green Space:

- OPTION 8: Allocate all designated 'Public Green Spaces' as 'Local Green Spaces';
- OPTION 9: Maintain existing local 'Public Green Spaces' and only allocate 'Local Green Spaces' that meet the framework's criteria;
- OPTION 10: Maintain existing approach of designating 'Public Green Spaces';
- Other option;

5.2.2 Option nine was the clear favourite with 292 out of a total of 322 responses in favour. The majority of respondents commented on local green spaces issues. The Leckhampton Fields sites accounted for 43% of all LGS comments. Redthorn Way, Swindon Village, and the A40 corridor were all referenced over 100 times. The vast majority of comments relating to the 29 LGS sites (as identified in the consultation

document) were in support; although levels of support for individual sites varied. Those not in favour of a LGS designation only registered opposition to Leckhampton Fields, and Swindon Village. Several new LGS sites were also promoted.

5.3 We've done

- 5.3.1 Evidence provided by the community has been assessed by a panel of officers. This included investigating the current development status of the sites (for example if the site was already allocated for development or had been included in the SALA) and their accordance with the criteria laid out in the NPPF. More information about the criteria used can be found in Appendix C.
- 5.3.2 It was considered that 11 sites were demonstrably very special to the local community and suitable for Local Green Space designation. These sites are listed in the draft policy GE8A below and are illustrated on the Proposals Maps. A table showing reasoning for the decisions taken on each potential LGS site can be found in Appendix D.
- 5.3.3 Land currently designated as Public Green Space will continue to benefit from strong policy protection. Six sites included in the preferred option currently benefit from planning protection as Public Green Space. These sites would not usually gain any additional planning protections from LGS designation so an alternative option (GE8B) has been included which omits those six sites. One of these six sites, Pilgrove Way, was found by the panel to not meet all of the LGS criteria. It has been included in the consultation, however, as it is a special site to the local community and will form part of a larger open space as part of the JCS Strategic Allocation.
- 5.3.4 The North West Cheltenham Strategic Allocation adjacent to Swindon Village is also part of the JCS. The JCS has provided an indicative plan where LGS should be designated in this area as part of a green buffer around Swindon Village.
- 5.3.5 Local Green Space designation at Leckhampton has not been considered by the Cheltenham Plan LGS officer panel at this stage. This is because this area has been part of the JCS process. The Leckhampton site is now no longer a Strategic Allocation and any development at that site will be part of the Cheltenham Plan rather than the JCS. As a result the development and Local Green Space proposals at Leckhampton are not as far advanced as at Swindon Village.
- 5.3.6 It would be premature at this stage for the Cheltenham Plan to have a preferred option about LGS at Leckhampton. Due to the site recently being taken out of the JCS process the development and green space plans for the area are not as defined as those adjacent to Swindon Village. This is why it appears as an indicative area only on the policy maps. The indicative area shown on the map is based on the JCS Inspector's comments in her Note of Recommendations from 21 July 2016¹. LGS in this area, and any others submitted during this consultation, will be assessed over

¹ <http://www.gct-jcs.org/PublicConsultation/Examination-Documents-234-onwards.aspx>

the coming months and be included in the next stage of public consultation on the Cheltenham Plan in summer 2017.

- 5.3.7 Cheltenham Borough Council have agreed to conduct a review of the Local Green Space in relation to the West Cheltenham emerging Strategic Allocation. GRCC have been commissioned to work with the local community to produce a toolkit supporting their ideas for LGS in the Strategic Allocation. This will be included in the next stage of the JCS, which will provide an indicative area for LGS which the Cheltenham Plan will then to designate. The proposed area will be consulted on in the next Cheltenham Plan consultation in summer 2017.

5.4 Preferred Option

Proposed Policy GE8A LOCAL GREEN SPACE

Development will not be permitted within a Local Green Space, designated either within the Cheltenham Plan, or an approved Neighbourhood Plan unless there are very special circumstances which outweigh the harm to the Local Green Space. Particular attention will be paid to the views of the local community in assessing any development proposals that affect a designated Local Green Space.

The following sites (as identified on the Proposals Maps) are proposed for designation as Local Green Spaces within the Cheltenham Plan:

- a) land at Hesters Way Community Centre;
- b) land at Lynworth Green;
- c) land at Albermarle Orchard;
- d) land at Colesbourne Road and Redgrove Park;
- e) land at Victoria Cricket Ground;
- f) land at Fairview Green;
- g) land at Newcourt Green;
- h) land at Henley Road and Triscombe Way;
- i) land at Chargrove Open Space;
- j) land at Redthorne Way;
- k) land at Caernarvon Park;
- l) land at Pilgrove;
- m) land at Swindon Village;
- n) land at Leckhampton (indicative area only).

- *The policy contributes to objectives Vision Theme C – objectives a, b and e.*
- *Relevant JCS policies: INF4; SA1*

Links to key local evidence:

- Local Green Space study report (2015)
- Local Green Space criteria document (Appendix B)
- Local Green Space site assessment table (Appendix C)

5.5 Alternative options

- 5.5.1 A number of sites submitted for consideration that were found to be very special to the local community are already Public Green Space sites and will continue to benefit from that protection. As designating these sites will provide little additional planning protection the below alternative option describes a policy which only includes special sites which are not already Public Green Space.

Proposed Policy GE8B LOCAL GREEN SPACE

Development will not be permitted within a Local Green Space, designated either within the Cheltenham Plan, or an approved Neighbourhood Plan unless there are very special circumstances which outweigh the harm to the Local Green Space. Particular attention will be paid to the views of the local community in assessing any development proposals that affect a designated Local Green Space.

The following sites (as identified on the Proposals Maps) are proposed for designation as Local Green Spaces within the Cheltenham Plan:

- a) land at Hesters Way Community Centre;
- b) land at Lynworth Green;
- c) land at Albermarle Orchard;
- d) land at Colesbourne Road and Redgrove Park;
- e) land at Victoria Cricket Ground;
- f) land at Swindon Village;
- g) land at Leckhampton (indicative area only).

- *The policy contributes to objectives Vision Theme C – objectives a, b and e.*
- *Relevant JCS policies: INF4; SA1*

Links to key local evidence:

- Local Green Space study report (2015)
- Local Green Space criteria document (Appendix C)
- Local Green Space site assessment table (Appendix D)

5.6 Discounted Option

- 5.6.1 There are no other reasonable alternatives. The alternative to not take the LGS process forward would go against a clear community desire to protect important open spaces.

5.6.2 The process used to determine which sites should be designated as LGS complies with the NPPF and nPPG. Therefore the conclusions which came from this process are in conformity with national policy.

6 DEVELOPMENT PROPOSALS

6.1 The need for housing development

6.1.1 In seeking to achieve more sustainable forms of development, the Government has provided clear policy on the provision of new housing. Local authorities should:

- plan to meet the housing needs of the whole community
- provide wider housing opportunity and choice and a better mix in the size, type and location of housing
- place housing in locations which are accessible by public transport to jobs, shopping, leisure, education and health facilities
- give priority to using previously-developed land within urban areas
- make more efficient use of land
- promote good design in new housing development, placing the needs of people before the ease of traffic movement.

6.1.2 One of the aims of the Cheltenham Plan is to ensure that the Council maintains a healthy supply of land for housing. National planning policy also requires that Local Plans meet their objectively assessed need (OAN) for development.

6.1.3 In Cheltenham the demand for housing is high, but the scope for further residential development is constrained by the historic urban environment, the Green Belt, the Area of Outstanding Natural Beauty, and green spaces protected for the recreational and leisure needs of residents and visitors to the town and biodiversity.

6.1.4 The OAN for Cheltenham has been assessed as part of the JCS process. The overall housing requirement for the whole area between 2011 and 2031 is 35,175 dwellings with the Cheltenham specific figure of **10,915**. More information about how these figures have been derived can be found on the JCS website (<http://www.gct-jcs.org/>).

6.1.5 In order to help meet the housing requirements the JCS looks to focus development into the existing urban areas. However, the housing need exceeds what can be accommodated within the main urban boundaries. In order to address this the JCS proposes large, strategic sites for development on the edge of Cheltenham.

6.1.6 Table 3 demonstrates the latest housing evidence figures for Cheltenham. It shows the supply of housing to be delivered between 2011-2031 and the total need for the same period.

TABLE 3: HOUSING NUMBERS FOR CHELTENHAM

Housing completions since 2011	1426
Dwellings with planning permission	1890
Cheltenham Strategic Allocations	5385
Urban Capacity Potential	557
Urban Capacity Permissions	89
Land at Farm Lane	377
Arle Nurseries/Old Gloucester Road	200
Leckhampton	200
Windfall	865

Total Supply 2011-2031	10989
Cheltenham Housing Need 2011-2031	10915

- 6.1.7 National policy requires Local Plans to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against the housing requirement. The housing trajectory will be updated annually through the Annual Monitoring Report. More information about monitoring and review can be found in Part 7 of the JCS.
- 6.1.8 The current Local Plan and the JCS include policies outlining a requirement for developments to deliver a wide choice of high quality homes and to create sustainable, inclusive and mixed communities. These policies will remain part of the development plan and will continue to be applied. The Cheltenham Plan: Part 1 will, when adopted, bring up-to-date a small number of crucial policies.

6.2 You said

- 6.2.1 The 2015 Issues and Options consultation document presented 103 potential site allocations. The majority of comments made in relation to sites expressed the need to maintain the existing urban boundaries. There was also some concern about potential development on Green Belt, AONB and other greenfield sites. However, a number of respondents focused on the need to boost the supply of housing in line with the NPPF and many also referenced the JCS examination and challenged Cheltenham's housing numbers (objectively assessed housing need).

6.3 We've done

- 6.3.1 Following the Issues and Options consultation officers continued to update information about potential development sites. All sites were then subjected to basic, high level criteria to filter out those which would either not be suitable for residential development or would not benefit from having a policy allocation.
- 6.3.2 The filtered sites were then discussed at an officer panel. The input of the Conservation, Development Management, Trees, Streetscape, Landscape and Highways teams was collected in order to gain a better understanding of constraints and opportunities.
- 6.3.3 The site information was then merged with the Borough's information on Urban Capacity. The Urban Capacity sites were originally put together in 2013 as part of the JCS process. They represent a high level appraisal of all the sites which are likely to come forward for residential or mixed use development within the urban area over the course of the plan.
- 6.3.4 The process of integrating new site information into the Urban Capacity led to a revised figure. This is the result of some sites being built out and others having their capacity reduced or increased as a result of new evidence. Six new sites were also identified within the Borough which increases the Urban Capacity to 557 dwellings.
- 6.3.5 An assessment of whether each site would benefit from an allocation for either housing development or mixed use was then undertaken. The justification for what type of allocation is appropriate is included in the Urban Capacity Update table in Appendix D.

Housing Allocations

6.4 Preferred Option

6.4.1 The existing built up area of Cheltenham is tightly constrained by Green Belt and AONB with very little undesignated land in which to expand. It is therefore logical to make the most of previously developed and underused land within the existing urban area. This approach is also in line with JCS policy SP1 which aims to see development delivered within existing urban areas and Strategic Allocations.

6.4.2 The Preferred sites set out below have been carefully assessed. The reasons for each site's inclusion/exclusion from the Preferred Options are set out in Appendix E. Site specific policies have not been proposed at this stage but an indication of housing capacity has been provided. More detailed site policies will develop following this consultation.

6.5 Urban sites

Reeves Field

6.5.1 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.

6.5.2 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.

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

Monkscroft Primary School

6.5.4 The site comprises the playing fields of the former Monkscroft Primary school, between Shakespeare Road to the north and Shelly Road to the south. The main school buildings have been demolished and replaced with a residential care home. It is estimated that the site has capacity for around 60 dwellings.

Springbank Shopping Centre

6.5.5 This is a brownfield site within the urban area, surrounded by existing residential development. It was previously in use as a Neighbourhood Shopping centre, however it has been vacant for a number of years. It is estimated that the site has capacity for around 36 dwellings.

Christ College Site B

6.5.6 This is a greenfield site within the urban area, previously used as school playing pitches. It is now disused. It is estimated that the site has capacity for around 70 dwellings.

Rivershill House

- 6.5.7 This is a flat site of vacant office buildings in a central urban location, predominantly surrounded by residential uses. A Prior Approval application for change of use from office to residential in 2013 was successful. A planning application for the demolition of the current building and erection of 45 apartments has been submitted and is pending a decision.

Premiere Products

- 6.5.8 This represents a vacant single occupier employment site in the east of the town. The site is set within a residential area and borders Cheltenham Cemetery to the east. A number of attributes contribute towards allowing it to change from employment to residential use. For example, it is a large, single occupier site, distant from the strategic highway network and has been vacant for some time. It is estimated that the site has capacity for around 70 dwellings.

Lansdown Road

- 6.5.9 This is a brownfield site within a predominately residential area adjacent to Gloucestershire Constabulary headquarters. It is a flat site containing vacant office buildings. A concept statement produced in 2008 outlined potential for residential use on the site, including the adjacent area which is has subsequently been renovated as office use. The remaining area will be residential with approximately 45 units.

6.6 Sites outside of urban area

- 6.6.1 Although the Cheltenham Plan concentrates on focusing development within existing urban areas, the JCS process has indicated two areas outside of the existing urban area of Cheltenham which should be allocated for development in order to meet JCS housing requirements. The precise numbers and layout of both sites will need further work before plans can progress for their allocation:

Leckhampton

- 6.6.2 The JCS Submission document proposed a Strategic Allocation at Leckhampton. This would have amounted to approximately 650 dwellings within the Cheltenham boundary in that location. The JCS Inspector has indicated that this scale of development would not be sound and recommended that a smaller development of around 200 units would be more appropriate. This means that the site would fall below the size necessary for it to be allocated for development in the JCS. Therefore the Cheltenham Plan will allocate the land at Leckhampton instead. Despite this, the Leckhampton site remains part of the discussions within the JCS and it would be inappropriate at this stage for consultation on the Cheltenham Plan to make any firm proposals for this particular area.
- 6.6.3 An indicative figure of 200 dwellings has been used for potential development; however, this is based on basic density assumptions so it is likely to change as masterplanning progresses. Any development in this location will have to take into account landscape impacts, highways issues and green space. A clearer picture of what the Council's preferred option for this site will be provided in the next stage of consultation. Indicative boundaries are included on the relevant maps. These are

based on the JCS Inspector's comments in her Note of Recommendations from 21 July 2016².

Arle Nurseries / Old Gloucester Road

6.6.4 The site at Arle Nurseries / Old Gloucester Road has also arisen from the JCS. At present the site is within the Green Belt but the JCS Inspector has recommended that it be removed. She said that because areas to the north and south of the site will be developed it will no longer make a significant contribution to the Green Belt. The site will require masterplanning, flood assessments and a resolution on the future of the nurseries so the site boundaries and capacity are indicative only at this stage. It is estimated that the site has capacity for around 200 dwellings and will include elements of green space.

**POLICY PR1
LAND ALLOCATED FOR HOUSING DEVELOPMENT**

The following sites are allocated for residential development:

- a) land at Reeves Field;
- b) land at former Monkscroft Primary School;
- c) land at Springbank Shopping Centre;
- d) land at Christ College Site B;
- e) land at Rivershill House;
- f) land at Premiere Products;
- g) land at Lansdown Road;
- h) land at Leckhampton (indicative plan only);
- i) land at Arle Nurseries / Old Gloucester Road (indicative plan only).

Note: The sites are specified in table 4 and shown on the Proposals Map

TABLE 4: SITES ALLOCATED FOR HOUSING DEVELOPMENT

Site	Area (ha)	Current land use	Proposed land use	Anticipated Timescale
Land at Reeves Field	4.52	Sports Ground	Market housing (approximately 80 units including affordable housing).	6 – 10 years
Land at former Monkscroft Primary School	1.80	Vacant former school site	Market housing (approximately 60 units including affordable housing).	0 – 10 years
Land at Springbank Shopping Centre	0.51	Vacant Shopping Centre	Market housing (approximately 30 units including affordable housing).	6 – 10 years
Land at Christ College Site B	2.11	Unused Playing field	Market housing (approximately 70 units including affordable housing).	0 – 10 years
Land at Rivershill House	0.42	Vacant Office Building	Market housing (approximately 44 units including affordable housing).	0 – 10 years

² <http://www.gct-jcs.org/Documents/Examination-Documents-Library-7/EXAM-259---Inspectors-Note-of-Recommendations-from-21-July-2016.pdf>

TABLE 4: SITES ALLOCATED FOR HOUSING DEVELOPMENT

Site	Area (ha)	Current land use	Proposed land use	Anticipated Timescale
Land at Premiere Products	2.17	Vacant Employment Buildings	Market housing (approximately 70 units including affordable housing).	0 – 10 years
Land at Lansdown Road	1.06	Vacant Office Buildings	An existing concept statement outlines potential for residential uses on the entire site. Part of the site has subsequently been renovated as office use and should be retained as such. The remaining area will be residential with approximately 45 units.	6 – 10 years
Land at Arle Nurseries / Old Gloucester Road	14.5	Nursery / Fields	This site will be taken out of the Green Belt by the JCS. Flood risk on the site as well future of the Nursery will need to be planned. An indicative figure of 200 dwellings is suggested.	11 – 15 years
Land at Leckhampton	15	Fields	Any development in this location will have to take into account landscape impacts, highways issues and green space. A clearer picture of what the Council's preferred option is for this site will be provided in the next stage of consultation in Spring 2017. An indicative figure of 200 dwellings is suggested.	6 – 10 years

- *The policy contributes to objectives Vision Theme A – objective b; Theme C – objectives a and b.*
- *Relevant JCS policies: SP2, SD11; SD12*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: PR1*

<p>Links to key local evidence:</p> <ul style="list-style-type: none"> • Strategic Assessment of Land Availability (2015) • Housing Needs Assessment (2009) • Strategic Housing Market Assessment (2009) • Strategic Housing Market Assessment for Gloucestershire (2014)

6.7 Alternative Options

6.7.1 All sites have been assessed and compared against the same criteria and the most sustainable have been selected. A lower limit of 40 dwellings was chosen as smaller sites would not benefit from allocation. Details on sites included within the urban area can be found in Appendix D and details on all sites can be found in Appendix E.

Mixed Use Allocations

6.8 Preferred Option

- 6.8.1 In order to improve facilities and employment opportunities in the Borough and to make best use of land in sustainable locations the Council has recognised the scope for mixed use development on five sites which have a clear prospect of development within the plan period. These are listed in draft policy PR2 below.

Priors Farm Fields

- 6.8.2 This is a greenfield site which sits adjacent to a residential area but outside of the existing Principal Urban Area. The western part of the site is a designated Public Green Space including playing pitches and a play area and the eastern part of the site is open fields. The site borders the cemetery to the north, the AONB to the east and new residential development to the south and west. Any housing development would be focused on the east of the site, however, masterplanning is required to reconcile several competing demands on this land and to minimise impact on the AONB (proposals should be in conformity with 2015 AONB study and 2016 update). Based on developing only a limited part of the site, it is estimated there is capacity for around 25 dwellings.

Coronation Square

- 6.8.3 This is a flat site within the urban area. Existing retail facilities are designated as a District Centre but are largely underused according to the Cheltenham Retail and Leisure Study (2006). There is an opportunity for comprehensive redevelopment by including an area of green space and improving transport circulation. The Retail and Leisure Study recommends encouraging mixed-use redevelopment to include residential uses. Coronation Square is a complex site with competing demands and could potentially be subject to wider regeneration projects. Therefore the site will require mixed-use masterplanning. It is estimated that redevelopment of the site could provide a net increase of around 17 dwellings.

Royal Well and Municipal Offices

- 6.8.4 This is a flat, developed site within the town centre, currently in use as council offices, bus station, car park and area of open space. It is within the Core Commercial Area and Central Conservation Area and partially within Flood Zones 2 & 3. The site is identified within the Civic Pride SPD and has been subject to a development brief which identifies potential for existing uses to be relocated / redesigned. It is estimated that redevelopment of the site could provide around 36 dwellings.

196 – 102 Prestbury Road

- 6.8.5 This is a flat, brownfield site within a predominantly residential area, currently in use for industrial / employment uses. It is a large site which already benefits from an informal concept statement for mixed use development. It is estimated that redevelopment of the site could provide around 40 dwellings and retain 0.5ha of employment land.

North Place and Portland Street

- 6.8.6 The North Place and Portland Street area was formerly used as the main Coach and Bus station in Cheltenham. The site currently provides 813 parking spaces. It will be important to ensure the site is not seen in isolation of other town centre schemes such as Boots Corner, the Brewery link and obtaining rights over the parking area of St Margaret's Terrace which could all provide cumulative benefits.
- 6.8.7 The site is located within the central conservation area of Cheltenham and is approximately 2 hectares in size (3.2 hectares including the highway). The site sits within the Central Conservation Area, and is immediately adjacent to the grade II* Trinity Church; the grade II* Saint Margaret's Terrace; and the grade II Dowty House, and consequently the form, massing and design of the any development has potential to impact upon the adjacent historic environment, either positively or negatively.
- 6.8.8 Planning permission was granted on the site in 2013 for a large supermarket, car park and 143 dwellings. However, that permission has not yet been implemented and a new scheme may be required in order for development to take place. It is estimated that a new scheme would provide a similar number of dwellings to the existing planning permission. Please note that this site is not included in the Urban Capacity table because it has an extant permission and is included in our records as a 'commitment'.
- 6.8.9 In addition to the five sites listed above, land at St. George's Place / St. James' Square has also been identified by the Joint Core Strategy. The site was originally allocated for mixed use development as part of the Cheltenham Borough Local Plan but redevelopment relied upon on changes to town centre car parking arrangements. These changes have not taken place to date and the site remains in use as a public car park. Nevertheless, it is considered that the site may still have potential to make a contribution towards residential provision towards the end of the plan period. At this stage the potential for housing units is uncertain so whilst no allocation has been made, the principle of redevelopment is accepted.

POLICY PR2

LAND ALLOCATED FOR MIXED USE DEVELOPMENT

The following sites are allocated for mixed use development:

- (a) land at Priors Farm Fields;
- (b) land at Coronation Square;
- (c) land at Royal Well and Municipal Offices;
- (d) land at 196 – 102 Prestbury Road;
- (e) North Place and Portland Place.

Note: The sites are specified in table 5 and shown on the Proposals Map

TABLE 5: SITES ALLOCATED FOR MIXED USE DEVELOPMENT

Site	Area (ha)	Current land use	Proposed land use	Anticipated Timescale
Land at Priors Farm Fields	12.01	Fields / playing fields	Several competing demands on the site including Local Green Space, allotments, flood alleviation scheme, access to Crematorium and housing (approximately 25 units). Site will require mixed-use masterplan.	11 – 15 years
Land at Coronation Square	1.48	Car park / Shopping area	Complex site with competing demands and potentially subject to wider regeneration projects. Site will require mixed-use masterplan.	11 – 20 years
Land at Royal Well and Municipal Offices	0.86	Employment / Bus Station	An existing development brief outlines potential uses of the site.	11 – 20 years
Land at 196 – 102 Prestbury Road	1.30	Commercial / Industrial	Large site which already benefits from an informal concept statement for mixed use development (including approximately 40 dwellings).	11 – 16 years
North Place and Portland Place	2.0	Former Coach Station / residential	Planning permission was granted on the site in 2013 for a large supermarket, car park and 143 dwellings but this has not been implemented.	6 – 16 years

- *The policy contributes to objectives Theme A – b. Theme B – a and b. Theme C – a and b*
- *Relevant JCS policies: SP2, SD11 and SD12*
- *The policy is designed to replace the following saved policy from the Cheltenham Borough Local Plan Second Review 2006: PR1*

<p>Links to key local evidence:</p> <ul style="list-style-type: none"> • Strategic Assessment of Land Availability (2015) • Housing Needs Assessment (2009) • Strategic Housing Market Assessment (2009) • Strategic Housing Market Assessment for Gloucestershire (2014) • Cheltenham Retail and Leisure Study (2006)

6.9 Alternative Options

6.9.1 All sites have been assessed and compared against the same criteria and the most sustainable have been selected. A lower limit of 0.5ha was chosen as smaller sites would not benefit from allocation. Details on sites included within the urban area can be found in Appendix D and details on all sites can be found in Appendix E.

7 AMENDMENTS TO THE PRINCIPAL URBAN AREA

7.1 Background

7.1.1 The Principal Urban Area (PUA) marks the limits of Cheltenham town, being the dividing line between built-up/urban areas (the settlement) and non-urban or rural areas (the countryside), to define where planning policies apply.

7.1.2 A settlement boundary can serve a number of related, but separate, purposes such as:

- creating an edge to existing development thereby encouraging consolidation;
- helping to separate communities and therefore retain their individual identities; and
- defining the logical boundary between areas with different features and purposes, e.g. between areas with environmental or landscape designations and those suitable for development.

7.1.3 There are a number of advantages of settlement boundaries:

- They provide an easy to understand tool that gives certainty for landowners, developers and community over where development is likely to be acceptable and where is it not.
- They can direct development to the urban area and this can help increase the viability of local services, as well as encourage new ones to establish.
- They ensure a plan-led and more controlled approach to future development, providing a firm basis for protecting the countryside from unnecessary encroachment.
- They can allow a presumption in favour of development of sites that are too small to be identified as formal allocations in a local plan.

7.1.4 Disadvantages of settlement boundaries:

- By restricting development, settlement boundaries can artificially increase land values within the settlement compared with land outside, as the likelihood of successfully gaining planning permission differs.
- Where land directly adjoins a settlement boundary, landowners often give it 'hope value' because they are waiting for the possibility of the boundary being realigned at some point in the future to accommodate future growth of the settlement.
- The general presumption that development within settlement boundaries is acceptable can result in pressure for the development of valued open spaces within settlement boundaries.
- The use of settlement boundaries can lead to the perception that they result in cramming development into already well-developed settlements, e.g. within the gardens of houses.

7.2 Why review the PUA?

7.2.1 JCS Policy SP1 directs new development to existing urban areas and Strategic Allocations. In order to apply this policy in the best possible way it is necessary to have an up-to-date, accurate boundary for Cheltenham's urban area.

7.2.2 The Principal Urban Area (PUA) is an important designation which should be as up to date as possible if it is to remain as useful as possible. It is good practice to use the Cheltenham Plan process to undertake a review of anomalies. There are also some instances of recent edge of settlement developments which fit with the urban character of the town that should be included.

7.2.3 Boundaries have been redrawn to include sites where land has been developed or planning permission has been granted for development over the past few years. The circumstances of each development have been investigated to consider whether or not it is appropriate to include within a revised boundary.

7.3 We've done

7.3.1 Officers undertook a desktop survey using GIS mapping and aerial photography together with information from the monitoring of planning applications, permissions and developments to locate any anomalies and areas where new development has taken place beyond the existing PUA. The circumstances of the each development have been investigated to consider whether or not it is appropriate to include within a revised boundary.

7.4 Preferred Option

7.4.1 Each alteration is listed in Appendix F with a map and a brief justification. They are also included on the Proposals Map.

7.5 Alternative Options

7.5.1 The PUA is an important policy designation because of the reasons described above. It is therefore prudent to update the boundary periodically and the alternative to not undertake a review is not considered reasonable.

8 PERMITTED DEVELOPMENT RIGHTS AND THE USE OF ARTICLE 4 DIRECTIONS

8.1 Background

- 8.1.1 This section of the consultation is slightly different to the previous sections because the Council do not yet have a Preferred Option for Article 4 directions. Instead this consultation provides an opportunity to gather feedback on whether any Article 4s would be supported and, if they are, which ones would be most beneficial.
- 8.1.2 Also, the legal mechanism for creating them is separate from the Cheltenham Plan. However, the Cheltenham Plan will contain references to any proposed Article 4s and would need to implement complementary policies.
- 8.1.3 The Council is aware that the density of Houses in Multiple Occupation (HMO) in the certain areas, primarily St Paul's and All Saints, has caused issues for residents. A separate project is underway to accurately survey HMOs to gather evidence regarding a potential licensing scheme and/or an Article 4 direction.

8.2 Article 4 directions

- 8.2.1 Certain works that would normally require planning permission are permitted by the General Permitted Development Order (GPDO) because the works are considered to be of a scale or type that is generally not likely to have an unacceptable impact. The GPDO sets out classes of development for which a grant of planning permission is automatically given. At present conversion of a residential dwelling to an HMO of between three and six residents is classed as permitted development.
- 8.2.2 An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.
- 8.2.3 Government guidance on making Article 4 directions stipulates they should be used only in those exceptional circumstances where the exercise of permitted development rights would:
- harm local amenity,
 - harm the historic environment, or
 - prevent the proper planning of the area.
- 8.2.4 In Cheltenham, the Council considers that there are several cases for making Article 4 directions as, over a period of time, circumstances have cumulatively caused each of the above criteria to be fulfilled. The policy areas concerned relate to:

- Housing, specifically the number of houses that have been converted into multiple occupation;
- Conservation Areas, specifically the erosion of the special character in some of the Borough's conservation areas through householder development;
- Employment, specifically the loss of office accommodation to residential uses – a process which is likely to be exacerbated by further legislative changes involving light industrial uses in 2017.

8.2.5 A number of factors will need to be considered when exploring the suitability of introducing Article 4 directions, not least the advantages:

- It means changes that can currently be made without planning permission will be brought under a greater degree of control and protection.
- There is likely to be better public awareness and increased understanding of the reasons why development needs to be managed in a different way.
- Ultimately, the character, appearance and amenity of identified areas should be improved.

8.2.6 The disadvantages:

- An Article 4 direction only means that planning permission needs to be sought; it does not mean it will always be refused. So planning policy would need to be updated to reflect the new requirements and to explain when planning permission would be needed.
- The harm the direction is intended to address will need to be clearly identified so any changes that are proposed will need to be underpinned by sufficiently robust evidence. This will be especially important if the permitted development rights are intended to apply to a wide area such as the whole Borough.
- Once the intention to introduce an Article 4 direction is made, legislation requires that it should take a year for it to come into effect or the Council could be liable to pay compensation claims from those affected by the direction.
- The above timescale could perhaps provide a catalyst for immediate changes to start occurring; for example, there could be a drive to undertake permitted works once notification of the proposed changes is made, but before it comes into effect.
- An Article 4 direction which only covers part of an area may mean that the original problem is effectively pushed towards other areas nearby.
- There will be an increasing administrative burden on the Council to process applications for development which will not attract a revenue stream – there is no fee associated with these applications.

8.2.7 By considering the introduction of controls on certain types of development in the three key areas mentioned above, the Council does not necessarily wish to prohibit changes from taking place. Rather, it wishes to bring certain development under greater control so that Cheltenham is allowed to grow, change and adapt in a balanced and managed way.

8.3 Houses in Multiple Occupation

8.3.1 A house in multiple occupation (HMO) can be defined in simple terms as a shared residential property where a certain number of occupants are not related to each other and they share basic amenities such as kitchen areas and bathroom facilities.

8.3.2 For planning purposes, small HMOs fall within use class C4, which are defined as:

“small shared houses or flats occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.”

8.3.3 Larger HMOs, occupied by more than six unrelated individuals, fall within the sui generis use class (meaning of their own kind). Planning permission has always been required for proposals for large HMOs (sui generis use), whether this be purpose built accommodation or the change of use of an existing property.

8.3.4 Whilst HMOs are an important type of housing, high concentrations can have a negative impact on the town's communities. These negative impacts can include increased noise nuisance, anti-social behaviour or unkempt gardens. Some parts of the city, especially those close to the University, are becoming home to a high number of HMOs which are causing problems for other residents.

8.3.5 Article 4 directions and the resulting removal of permitted development rights is a separate process to the production of a development plan, but it can run alongside, and much of the evidence that is gathered as part of one process will be valuable in helping to inform the other. For example, should an Article 4 direction on HMOs in part of St Pauls be issued then a policy in the Cheltenham Plan will be required to deal with the planning applications that would have otherwise been permitted development. This policy could aim to ensure that the proportion of HMO dwellings does not exceed a certain percentage of all residential properties within a given metre radius of the application site. The evidence required to support such a policy would be similar to that needed to issue the Article 4 direction in the first place.

9 CONSERVATION AREA REVIEW 2016-2018

- 9.1 The Council embarked on project to review conservation areas within the Borough in April 2016. It is a statutory duty for local authorities to keep conservation areas up to date. Cheltenham's rich architectural heritage is an integral part of the character and appeal of the Borough so it is vital that policies which protect and enhance it are regularly reviewed.
- 9.2 The two year review aims to examine the current boundaries to ensure that the areas continue to be of a character and appearance which is desirable to preserve and enhance. Furthermore, where appropriate it will examine where any potential new designations could be made to ensure the protection of Cheltenham's heritage.
- 9.3 Conservation Areas are areas where the local planning authority identifies an area of special architectural or historic interest, which deserve careful management to protect that character. The contribution that historic areas make to our quality of life is widely recognised. They are a link to the past that can give us a sense of continuity and can provide a point of reference in a rapidly changing world.
- 9.4 The conservation area review will produce an up to date character appraisal which will identify the character of the area, including key buildings, spaces and positive and negative features. It will involve conducting detailed surveys of each of the current conservation areas ensuring an accurate record of properties, boundary treatments, street furniture and key views, all of which play an important role in creating the character of conservation areas. It will also enable any extensions of conservation areas to be explored, possibly where the boundary has been drawn too tightly in the past.
- 9.5 It is important that these documents are updated on a regular basis, as development within conservation areas is often judged against the character outlined in the appraisals. Updating of the documents will help highlight what is significant about each conservation area ranging from the original burgage plots of the Lower High Street to the Regency villas of Pittville, each important in their own right but very different and distinct in terms of their respective character.
- 9.6 The review will also produce management plans for each of the conservation areas which will explore potential enhancement schemes and how the character can best be preserved. Moreover, the potential introduction of additional enforcement powers through the introduction of Article 4 Directions may well be recommended for certain areas following public consultation.
- 9.7 New designations are likely to be explored over the coming 18 months, but the primary aim of the work is to ensure that the current appraisals and management plans are up to date and so this must take priority over new designations. The current timeframe for the projection estimates that all appraisals and management plans will be completed by April 2018.

9.8 Public consultation will form an important element in the creation of both the appraisals and management plans to ensure that residents' views are fairly represented and to explore any improvements or enhancement schemes for the area. Feedback on this project is not required at present. However, officers will be consulting separately with local communities over the course of the project through Parish Councils, Neighbourhood Community Groups, The Civic Society and other groups on the conservation areas relevant to them.