

Cheltenham Borough Council

Strategic Housing Land Availability Assessment

Interim Report April 2008

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Executive Summary

This interim Strategic Housing Land Availability Assessment (SHLAA) forms a key component of the Local Development Framework evidence base and will inform the preparation of the Local Development Framework documents, ***the SHLAA does not however allocate sites.***

The production of a SHLAA is a requirement of Planning Policy Statement (PPS) 3: Housing. The purpose of a SHLAA is to evaluate the availability of land for housing within Cheltenham and assess the ***potential*** capacity of that land.

The SHLAA has been produced by Cheltenham Borough Council's Strategic Land Use Team, in consultation with councillors and officers, the Home Builders Federation and other relevant parties from the development industry. The SHLAA has been undertaken in line with the Council's Strategic Housing Land Availability Assessment: Methodology, which was subject to consultation in 2007.

The draft Regional Spatial Strategy has proposed a requirement of 12,500 homes to be provided within and adjoining Cheltenham over the period 2006 – 2026 and the recent Panel Report (January 2008) has recommended a revised requirement of 13,800 dwellings. It is against this requirement that the SHLAA is assessed.

The SHLAA seeks to identify potential sites suitable for housing within the Principal Urban Area, see Appendix E for a plan, as defined by the Adopted Local Plan 2006. A parallel evidence base, the Comparative Site Assessment (CSA), is also being undertaken by the Council which looks at all sites across the borough, and once complete the results of the CSA and this SHLAA will be combined to produce a final SHLAA.

The sites included within the SHLAA have either been identified from existing information, submitted to the Council for consideration by internal and external stakeholders or as a result of site survey work. The identified sites have been considered by Council officers and a selected Panel in terms of their suitability for housing, their availability for development and their potential attractiveness to the market.

As a technical evidence base, a large amount of the information is contained within the Appendices with a summary of results contained within the main report. The results show that Cheltenham has a 9.8 year supply of deliverable sites and has identified the PUA as being an acceptable location for further development, subject to suitable proposals. Delivery solely within the PUA will not meet all of Cheltenham's housing needs as required by the draft Regional Spatial Strategy. Cheltenham's LDF will need to address, how any outstanding requirement will be met.

The SHLAA is not intended as a one-off study but will be monitored and updated annually.

1 Introduction

- 1.1 The Government's objective for planning for housing is to '*ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.*'¹ A top priority for Government is to ensure that land availability is not a constraint on the delivery of homes.
- 1.2 Planning Policy Statement on Housing (PPS3)² sets out the Government's approach to housing and requires all local authorities to produce a Strategic Housing Land Availability Assessment (SHLAA) to evaluate the availability of land for housing within their area.
- 1.3 '*Strategic Housing Land Availability Assessments: Practice Guidance*'³ (herein referred to as *the guidance*) has been prepared by POS Enterprises and Llewelyn Davies Yeang for the Department for Communities and Local Government, in partnership with the Local Government Association, the Home Builders Federation, the Planning Officers Society and the Planning Inspectorate.

2 Purpose of a Strategic Housing Land Availability Assessment (SHLAA)

- 2.1 The SHLAA forms a key component of the Local Development Framework (LDF) evidence base to support the delivery of sufficient land for housing, and will inform the preparation of Cheltenham Borough Council's Local Development Framework documents, initially the Core Strategy. The SHLAA should be considered in conjunction with the other evidence base documents, see www.cheltenham.gov.uk/LDF Evidence Base, in particular the Comparative Site Assessment.
- 2.2 The purpose of a SHLAA is to:
 - Identify sites with potential for housing
 - Assess their housing potential and capacity; and
 - Assess when they are likely to be developed
- 2.3 The SHLAA should aim to identify sufficient specific sites for housing development for at least the first 10 years of a plan, from the anticipated date of its adoption, and ideally over a 15 year period. Where this is not possible, the SHLAA should identify broad locations for where future housing development may be located. This version of the SHLAA considers sites available as at April 2008, future updates, will where appropriate update this position.
- 2.4 **It is important to note that whilst the SHLAA is an important evidence source to be used to inform the plan preparation stage, it**

¹ PPS 3 CLG November 2006

² PPS 3 CLG November 2006 www.communities.gov.uk

³ Strategic Housing Land Availability Assessments: Practice Guidance, CLG July 2007

does not in itself determine whether a site should be allocated for housing development or not. As such, the inclusion of sites within this SHLAA does not imply that sites will necessarily go onto be allocated or that planning permission would be granted for housing development. It is for the Local Development Framework to consider all evidence base documents, to make allocations where appropriate and to set the overall housing strategy for the borough.

- 2.5 The SHLAA will also be used to monitor the 5 year supply of deliverable sites as required by PPS3.

Scope of SHLAA

- 2.6 This SHLAA is an interim report which will be updated following completion of a parallel evidence base, the Comparative Site Assessment (CSA), which is a comprehensive assessment of potential development sites across the borough, including urban and peripheral greenfield sites. See Appendix A for further information relating to CSA.
- 2.7 Once finalised, the results of the CSA will be capable of being aggregated with the SHLAA to provide an overall figure for housing potential within the borough. Future updates of the SHLAA will include all sites, urban and peripheral greenfield.

3 Outputs of the Strategic Housing Land Availability Assessment

- 3.1 The core outputs of the SHLAA are as follows:

- A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary) Appendices C, D and H
- Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed Appendix C
- Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified) Appendix C
- Constraints on the delivery of identified sites Appendix C
- Recommendations on how these constraints could be overcome and when Appendix C

4 Methodology

- 4.1 Cheltenham Borough Council produced an Urban Capacity Study in 2004 which informed the, now adopted, Local Plan and was produced in line with Tapping the Potential, DETR 2000. A Housing Land Availability Assessment (HLAA) was progressed to an advanced stage in 2007 using the draft practice guidance at the time⁴. Following the release of PPS3 and subsequently revised guidance⁵, the previous HLAA was suspended and work began on the production of the SHLAA. The desktop review and comprehensive surveying for sites undertaken as part of the HLAA remains relevant and has been included within the SHLAA.
- 4.2 In October 2007, Cheltenham Borough Council produced a Strategic Housing Land Availability Assessment: Methodology Scoping Report⁶ which was subject to key stakeholder consultation and was available for wider consultation on the Council's website. This methodology was produced in line with the guidance and in consultation with the other Gloucestershire authorities and can be seen in Appendix B.
- 4.3 Due to differing Local Development Scheme timetables, the Gloucestershire districts have not produced a SHLAA for the Gloucestershire Housing Market Area but individual district SHLAA's. A joint officer working group covering the Gloucestershire HMA has agreed the methodology used so that the SHLAAs are capable of aggregation at a later date, this will be particularly important when considering the housing requirements of the SSCT areas, and will be included within future SHLAAs. In due course, district level SHLAAs will be published on a co-ordinated basis.

⁴ Housing Land Availability Assessments: identifying appropriate land for housing development, ODPM, 2005

⁵ Strategic Housing Land Availability Assessments Practice Guidance, CLG July 2007

⁶ Strategic Housing Land Availability Assessment: Methodology Scoping Report Cheltenham Borough Council, October 2007

5 Cheltenham's Housing Requirement

- 5.1 The following section provides a brief explanation as to the housing requirements against which Cheltenham's SHLAA will be assessed.
- 5.2 PPS 3 requires Local Planning Authorities to identify 'sufficient land for the plan period of 15 years, ensuring that the first 5 years of sites are allocated and developable and that the 5 year supply is maintained as sites are developed out.'⁷
- 5.3 PPS 3 requires Local Planning Authorities to have regard to the level of housing provision as proposed within the emerging Regional Spatial Strategy. The emerging Regional Spatial Strategy for the South West was published for consultation in 2006 with a public examination summer 2007. Once adopted (expected end 2008) the Regional Spatial Strategy will replace Regional Planning Guidance 10 and the adopted Gloucestershire Structure Plan Second Review. The Regional Spatial Strategy covers the period 2006 -2026.
- 5.4 Cheltenham is identified as one of 21 Strategically Significant Cities and Towns (SSCTs) within the South West, which means it will be a primary focus for development up to 2026. A SSCT covers a broader area than the borough boundaries and cross-boundary working will be required with neighbouring authorities in plan preparation.
- 5.5 Policy SR13 of the draft Regional Spatial Strategy requires 12,500 homes to be provided within and adjoining Cheltenham over the plan period. The Panel Report on the draft Regional Spatial Strategy was published in January 2008 and recommends a revised housing requirement of 13,800 within and adjoining Cheltenham as follows:

Draft RSS proposed requirement (no. of dwellings)	Panel Report proposed requirement (no. of dwellings)
6,500 within the urban area	6,500 within the urban area
1,000 within Cheltenham but outside of the urban area	600 to the south of Cheltenham
1,000 on previously committed developments adjoining Cheltenham, but within Tewkesbury	1,000 to the north of Bishops Cleeve and: 700 to the south of Cheltenham but within Tewkesbury
4,000 within a strategic mixed use urban extension to the north west of Cheltenham, (approximately 1,000 within Cheltenham)	5,000 as an urban extension partly within Cheltenham, partly within Tewkesbury (<i>unspecified split</i>)
Total Housing Requirement	Total Housing Requirement
8,500 within Cheltenham Borough	8,100 within Cheltenham Borough
12,500 within Cheltenham SSCT	13,800 within Cheltenham SSCT

Table 1: Draft RSS and Panel Report Housing requirements for Cheltenham

⁷ PPS 3 CLG November 2006

6 Identified Sites

6.1 This section should be read in conjunction with specific information contained within:

- **Appendix B:** SHLAA methodology
- **Appendix C:** Schedule of identified sites
- **Appendix D:** Identified site plans and checklists
- **Appendix E:** Plan of assessment area
- **Appendix F:** Potential sources of supply considered

Assessment Area

6.2 Cheltenham is a compact and largely urban borough that contains no isolated settlements, although villages are located within the administrative boundary of the borough. The area identified for assessment within the SHLAA is the Principal Urban area (PUA), as defined in the adopted local plan, this boundary follows the built up boundary of Cheltenham. For a plan of the assessment area, see Appendix E.

6.3 All greenfield sites outside of the PUA, excluding the Area of Outstanding Natural Beauty (AONB) other than those sites identified by the development industry, are being considered in the parallel CSA evidence base.

Potential sources of housing supply

6.4 Appendix F lists the potential sources of housing supply which have been considered within the SHLAA. Sites have been identified using a number of different techniques, as follows:

- **Existing information:** for example, where sites have already been identified within the Adopted Local Plan or Development Briefs etc.
- **Comparative Site Assessment:** including sites which have either been submitted to the Council by interested parties, stakeholders and the development industry, or identified by officers and councillors internally, and which fall within the PUA.
- **Site Survey:** including review of aerial photographs, maps, review of planning history and site visits.

Review of identified housing potential

6.5 The potential capacity of identified sites was calculated using a variety of techniques as shown below. See Appendix F for details of which techniques were used for each source of supply.

- **Existing Information:** For example, if capacities have been provided as a result of pre-application discussions, or if the information has been submitted by a promoter of a site.
- **Urban design approach:** For larger, or more complex sites, the Council's Urban Design Team has considered the potential capacity of a site, taking account of suitable densities and mix of use for a site based on the individual characteristics of the site and surrounding area, including potential constraints, such as listed buildings and the need for open space.
- **Density Multiplier:** For any remaining sites the use of a density multiplier has been used to estimate the potential. The Draft Regional Spatial Strategy Development Policy F *Masterplanning* suggests that within SSTCs developments of at least 50/dwellings per hectare (dph) and higher wherever possible should be incorporated within urban areas. This assessment uses a density multiplier of 50/dph.

6.6 The following sections look at the potential sources of supply and identify any sites found within that source, as follows:

Potential Source	Paragraph Numbers
Sites in the planning process	
Land allocated (or with permission) for employment or other land uses which are no longer required for those uses.	6.8 – 6.11
Existing housing allocations and site development briefs	6.12 – 6.15
Unimplemented/outstanding planning permissions for housing	6.16 – 6.20
Planning permissions for housing that are under construction	6.21 – 6.23
Sites not currently in the planning process	
Vacant and derelict land and buildings	6.24 – 6.26
Surplus public sector land	6.27 – 6.34
Land in non-residential use which may be suitable for redevelopment for housing, such as commercial buildings or car parks, including as part of mixed - use development	6.35 – 6.50
Additional housing opportunities in established residential areas, such as under-used garage blocks	6.51 – 6.57
Large scale redevelopment and redesign of existing residential areas	6.58 – 6.62
Sites in rural settlements and rural exception sites	6.63
Urban extensions	6.64
New free-standing settlements	6.65

- 6.7 It should be noted that some identified sites may fall within a number of different sources, for example a car park site may also be an allocated site, where this is the case the site is only included once. The potential supply within each source, shows the *total* potential and does not, at this stage, take into account the deliverability/developability of a site. For the potential capacity which has been assessed in terms of 'deliverability' and 'developability', see Table 3 and Appendix C.

Sites in the planning process

Land allocated (or with permission) for employment or other land uses which are no longer required for those uses.

- 6.8 Cheltenham Borough Local Plan contains no allocations for non-residential development over and above mixed use sites identified within the following section.
- 6.9 Employment sites were assessed via Cheltenham's Employment Land Review (ELR), undertaken by Nathaniel, Lichfield & Partners on behalf of the Council. This report concludes that all existing sites continue to make a contribution to Cheltenham's economy and identifies a quantitative shortage of employment space within the borough. The report suggests a requirement for 30 hectares (ha) of employment land to meet emerging needs up to the period to 2026. The ELR makes the recommendation that all existing employment sites should be retained for employment purposes together with a strengthening of the existing local plan employment land safeguarding policy via the LDF.
- 6.10 Taking into account the conclusions of the ELR, the SHLAA has not assessed any existing planning permissions for employment uses. Only those employment sites which have been identified to the Council, either within previous urban capacity studies, existing sources of information or through the CSA have been considered within the SHLAA.
- 6.11 This source has not provided any potential supply.

Existing housing allocations and site development briefs

- 6.12 The Cheltenham Borough Local Plan second Review Adopted (2006) has allocated one site for residential development and six sites for mixed use development, including residential.
- 6.13 The capacities shown within the local plan were provided as minimum figures and have since been reviewed as a result of pre-application discussions and the Council's Civic Pride Initiative, as shown in Table 2 below.

Site	Allocated Site	Local Plan allocation	Revised Potential
43	Land at Lansdown Road	90	120
8	Land at Albion Street/Gloucester Place	60	161
27	Land at St Margaret's Road	100	325
28	Land at Portland Street	80	
5	Land at St. George's Place/St. James' Square	8	40
62	Land at Midwinter	55	160
14	Cheltenham Spa Railway Station	unspecified	23
Total		393	828

Table 2: Allocated sites within Cheltenham Borough Council's Adopted Local Plan 2006

6.14 A number of the allocated sites also have development briefs prepared for them or are in preparation via the Civic Pride Initiative, in addition there are also development briefs for:

- Outer West (September 2000) which identifies potential for mixed use development including residential, relating to site 7, Gas Works, Tewkesbury Road; and
- Gloucester Place, Sherborne Place and Fairview Road (April 2002) which identifies potential for mixed use development including residential, relating to sites 25, Bence's Timber Yard, St. John's Avenue and 26, Sherborne Place Car Park and also incorporating site 8 listed above.

6.15 This source provides potential for 1,294 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Unimplemented/outstanding planning permissions for housing

6.16 The Council's Residential Land Availability Report (RLA) annually records the number of unimplemented/outstanding planning permissions. The information used within the SHLAA is taken from the most recent report covering the period, 1st April 2006 to 31st March 2007.

6.17 As at the 1st April 2007 there were unimplemented planning permissions providing 1,206 dwellings and a further 96 firm commitments, totalling 1,302 unimplemented/outstanding dwellings. Firm commitments relate to outstanding permissions which are the subject of a resolution by Planning Committee to grant planning permission subject to the completion of a planning obligation or consultation with DCLG.

6.18 Planning permission for 15 dwellings expired in 2006/2007. Since 1999, planning permissions for 100 dwellings have expired, an average of

12.5 per year. This equates to approximately 2% of the total 4,285 dwellings completed within the same period.

- 6.19 Given the historically low rate of expired permissions and the continuing demand for housing within Cheltenham, it has been assumed that expiries will remain low. Assuming the same rate of expiries at 2%, the SHLAA considers that 1,276 of the remaining commitments have the potential to be implemented.
- 6.20 This source provides potential for 1,276 dwellings. For further details of unimplemented/outstanding permissions see the Residential Land Availability Report www.cheltenham.gov.uk/LDF Evidence Base.

Planning permissions for housing that are under construction

- 6.21 The Council's RLA annually records the number of planning permissions under construction. The information used within the SHLAA is from the most recent report covering the period 1st April 2006 to 31st March 2007.
- 6.22 As at the 1st April 2007 there were 365 planning permissions under construction. The SHLAA has assumed that all 365 planning permissions currently under construction will go on to be completed.
- 6.23 This source provides potential for 365 dwellings. For further details of permissions currently under construction see the Residential Land Availability Report www.cheltenham.gov.uk/LDF Evidence Base.

Sites not currently in the planning process

Vacant and derelict land and buildings

- 6.24 Individual vacant residential properties can be identified through Council Tax records, as at 25 February 2008, there were 596 long term vacant properties. The use of Empty Dwelling Management Orders can help to bring empty residential properties back into use and whilst impossible to predict exactly when empty properties will come back into the system, it is reasonable to assume that they might at some point over the plan period.
- 6.25 The following vacant and derelict sites have been identified:
- Best Mates Inn PH, Swindon Road (site 50)
 - Former Goat and Bicycle Public House and adjacent land, Hester's Way Road (site 51)
 - Axiom, Winchcombe Street (site 55)
 - Springbok, Albion Street (site 56)
- 6.26 This source provides potential for 637 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Surplus public sector land

6.27 As part of the CSA consultation, a number of public sector bodies were requested to identify potential development opportunities within their land ownership. Organisations included: Cheltenham Borough Council; Gloucestershire County Council; the Primary Care Trust; and GCHQ.

6.28 Cheltenham Borough Council's Civic Pride Initiative is taking place on 3 Council owned sites (of which sites, 5, 27 and 28 are allocated) in addition, the following sites have been identified:

- Royal Well and Municipal offices (sites 22 & 23)
- Lynworth Hall, off Mendip Road (site 49)
- Hesters Way Church, Barbridge Rd (site 46)
- Land rear of 30 -31 Pates Avenue (site 47)
- Community Centre & Scout Hut, Brooklyn Road (site 24)
- Land at Penrith Road (site 48)
- Great Western Road, land adjoining Great Western Road (site 59)

It should be noted that some council owned sites may also be included within other sources of supply such as Allocated land or car parks.

6.29 In addition, the Council's Property Development Team is currently undertaking a review of all Council owned assets. As this process is being undertaken, the SHLAA has not sought to repeat the assessment on Council owned sites and includes only those larger council owned sites which have been identified either within previous urban capacity studies, existing sources of information, through the Comparative site assessment or survey work. Future SHLAAs will include any additional identified sites.

6.30 Gloucestershire County Council has submitted a number of sites with potential, as follows:

- Land at Chester Walk (site 3)
- Land at Ellerslie (site 6)
- Monkcroft School (site 9)
- Kingsmead School (site 45)
- Land at Starvehall Farm (site 58)

It should be noted that some sites in public ownership may be included within other sources of supply such as Allocated land, see Table 2.

6.31 The Primary Care Trust, at the time of contact were undertaking an Asset review, the results of which were not yet available. However, one site has been identified to the Council. Future SHLAAs will include any additional identified sites:

- Delancey Hospital, Charlton Lane (site 2)

- 6.32 Developments are currently underway on surplus land at GCHQ Benhall and GCHQ Oakley, however the Council has been advised that there is currently no surplus sites available for disposal or redevelopment. This position will be kept under review.
- 6.33 The Council will aim to maintain correspondence with other public sector bodies and any sites identified as a result of the above reviews will be included within future SHLAAs.
- 6.34 This source provides potential for 664 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Land in non-residential use which may be suitable for redevelopment for housing, such as commercial buildings or car parks, including as part of mixed - use development

- 6.35 This includes a variety of sources of supply, including change of use from existing employment, leisure or retail uses and the redevelopment of car parks.
- 6.36 The Employment Land Review (ELR) undertook an assessment of significant employment sites within the borough and identified a quantitative shortage of employment space within Cheltenham and recommended all existing employment sites should be retained for that purpose, including sites considered to be of poor quality. The ELR suggested a requirement for 30ha of employment land to meet emerging needs up to the period to 2026.
- 6.37 Given the work undertaken in the ELR, the SHLAA has not sought to repeat the assessment on employment sites. Only those sites which have been identified to the Council, included within previous Urban Capacity Studies, existing sources of information or through the Comparative Site Assessment have been included.
- 6.38 The SHLAA has noted that the loss of such a use is a potential constraint to development; however, it is one which could be overcome if a redevelopment proposal could adequately address the issue of employment provision. For example, the constraint may be able to be removed through a mixed use development or relocation of uses to an alternative, suitable site, elsewhere in the borough, or if it can be demonstrated that there is no longer a need for that use.
- 6.39 Sites being considered, currently in full or part employment use:
- Rivershill House, St. George's Road (site 15)
 - Spirax Sarco, Tennyson Road (site 20)
 - Spirax Sarco, St George's Road (site 21)
 - Elim Pentecostal Church, St. George's Road (site 44)
 - Parker Court, Knapp Lane (site 57)

- 2 Gloucester Road (site 13)

6.40 The DPDS Retail and Leisure Study undertaken on behalf of the Council in 2006, recognises Cheltenham as a successful retail centre, however, in light of increasing competition from nearby regional centres, the study recommends future areas for expansion of the retail, both in the town and district centres. The study also recognises the need to protect existing leisure uses where these are important to the vitality and viability of the town centre.

6.41 Given the work undertaken in the Retail & Leisure Study, the SHLAA has not sought to repeat the assessment on retail and leisure sites. Only those sites which have been identified to the Council, included within previous Urban Capacity Studies, existing sources of information or through the Comparative Site Assessment have been included.

6.42 A number of the identified sites have existing community uses on them, e.g. a religious facility or scout hut. Community and social facilities play an important role within the borough and are an important factor in the quality of local community life. The SHLAA has noted that the loss of such use is a potential constraint to development, however, one which could be overcome if any redevelopment proposal could adequately address the issue of community uses, for example through a mixed use development, or relocation of uses to an alternative, suitable site, elsewhere in the borough, or demonstrate that there is no longer a need for that use.

6.43 Sites being considered currently in retail, leisure or community use:

- Springbank Shopping Centre inc. adjacent Springfield House, Pilgrove Way (site 19)
- Land and Buildings at Coronation Square (inc. Edinburgh Place Car Park) (site 18)
- B & Q Site (site 1)

It should be noted that some sites containing retail/leisure or community uses may also be included within other sources of supply.

6.44 In considering the potential change of use of car parks, all council owned surface car parks are being assessed in terms of their potential for any form of redevelopment within the CSA. As such, only those car parks which have either been included within previous urban capacity studies, existing information or submitted to the council as part of the CSA have been included within the SHLAA.

6.45 Whilst all surface car parks, in theory, have redevelopment potential, the majority of these provide for short-stay parking and are a key facility for the town centre and local centres and the need to retain public parking capacity for the town centre is an important issue.

6.46 The SHLAA has noted that the loss of such a use is a potential constraint to development; however, it is one which could be overcome if a redevelopment proposal could adequately address the issue of car parking provision. For example, the constraint may be able to be removed through innovative design such as undercroft parking, replacement spaces in a suitable location elsewhere and expansion of park and ride sites and facilities.

6.47 Cheltenham Borough Council has introduced Civil Parking Enforcement (CPE) and this, combined with the Civic Pride proposals on existing car parks, is likely to impact upon parking patterns and consequently the demand on and the capacity of car parks within Cheltenham. This situation will be monitored and, informed by the future parking strategy, anticipated later this year which will be used to update future SHLAAs.

6.48 Sites being considered currently in use as car parks:

- Car Park at Rear of High Street & Chester Walk (site 4)
- Henrietta Street Car Park and Buildings (opposite Matalan) St Margaret's Road (site 32)
- Commercial Street Car Park (site 41)
- High Street Car Park and land at 453/456 High street (site 52)

It should be noted that some car parks may also be included within other sources of supply such as Allocated land, see Table 2.

6.49 The University of Gloucestershire is currently undertaking a review of all University owned sites within the borough with a view to rationalising the use of existing sites. The closure of Pittville Media Campus has been announced and it is possible that further university sites may be identified as having potential for redevelopment. At this stage, only the following sites have been included within the SHLAA, following the results of the University's review future updates of the SHLAA will incorporate any additional sites as appropriate.

- Hardwick site, St Paul's Road (site 10)
- Pittville Media Campus, New Barn Lane, (site 12)

6.50 This source provides potential for 603 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Additional housing opportunities in established residential areas, such as under-used garage blocks

6.51 When considering potential redevelopment opportunities within established residential areas it is considered that much of the potential on larger sites would arise within Council owned housing stock. Cheltenham Borough Homes (CBH) is an Arms Length Management Company (ALMO), set up to take responsibility for the management and maintenance of Cheltenham Borough Council's housing stock.

6.52 CBH is currently in the process of assessing garage sites within their management for potential retention, disposal or redevelopment. Given that CBH is undergoing this process of review, the SHLAA has not sought to repeat the assessment on such sites. Any sites highlighted as having potential for residential redevelopment as a result of the review by CBH will be taken into consideration at the plan preparation stage and incorporated in future updates of the SHLAA. For further information relating to CBH please see www.cheltborohomes.org.

6.53 The review of aerial photographs, maps, review of planning history and survey work identified theoretical potential for small scale infill developments within residential areas, predominantly within rear gardens.

6.54 It is difficult to identify a specific garden or gardens which could come forward for development with any certainty, in addition there is significant public opposition to development utilising residential gardens together with discussion nationally on the categorisation of gardens within the definition of previously developed land.

6.55 Whilst many sites may have potential, the actual rate at which intensification occurs in future will depend on a number of factors, including landowner intentions, local build rates, land values, the demand for housing, the reservoir of potential sites, acceptable density of development, as well as site specific considerations etc. Whilst difficult to identify, it is reasonable to assume that such development will occur and this situation will be monitored within the RLA and will be considered in Section 9 under broad locations for growth. Any specific sites will be included within future SHLAAs.

6.56 Potential sites within this source have been limited to those identified to the Council:

- Land adjoining Kyance, Church Road (site 61)

6.57 This source currently provides limited potential of 45 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Large scale redevelopment and redesign of existing residential areas

6.58 When considering potential for residential redevelopment opportunities on large sites it is considered that much of the potential would arise within Council owned housing stock managed by Cheltenham Borough Homes (CBH), with more potential for smaller scale redevelopment within privately owned sites.

6.59 CBH has produced an Asset Management Plan (November 2006) which sets out the context within which CBH manage the housing stock. The basic principles of the plan are the retention and improvement of stock to Decent Homes Standard rather than disposals, which are only considered in certain cases, where necessary and appropriate. The plan considers works required up to, and beyond, 2010.

6.60 The decision to improve the standard of homes rather than of disposal limits the potential for large scale redevelopment of residential areas in the medium term. It is also important to consider that the redevelopment of residential areas may result in an overall loss, or limited amount of new dwellings due to redevelopment at lower densities than existing. Any proposals relating to CBH managed property would require detailed consultation with CBH Tenants and Stakeholders.

6.61 Potential sites include:

- Hobart House (site 53)
- St Paul's Neighbourhood Renewal Assessment (site 54).

6.62 This source currently provides limited potential of 34 dwellings. See Table 3 and Appendix C for assessment of the developability of the sites and potential timescales for delivery.

Sites in rural settlements and rural exception sites

6.63 Not applicable within Cheltenham as a largely urban area. Peripheral greenfield sites are currently being assessed within the ongoing CSA and will be included in future SHLAAs.

Urban extensions

6.64 Not applicable within this version of the SHLAA. The draft Regional Spatial Strategy and Panel Report identify two 'areas of search' on peripheral greenfield sites straddling Cheltenham and Tewkesbury's authorities to the North West and South of Cheltenham. All peripheral greenfield sites are being assessed as part of the on-going CSA and future SHLAAs will incorporate potential capacity of peripheral greenfield sites, including areas covered by proposed urban extensions.

New free-standing settlements

6.65 Not applicable for Cheltenham as no such proposal has been suggested within the draft Regional Spatial Strategy or Panel Report.

7 Assessment of sites

7.1 The following section considers when and whether the identified sites are likely to be developed. Assessing the availability, achievability and suitability of a site provides information on which the judgement can be made in the plan making stage as to whether a site can be considered 'deliverable', 'developable' or 'not currently developable', as defined below:

- **Deliverable** is available now, offers a suitable location for housing development and with a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan.
- **Developable** is in a suitable location for housing development, and with a reasonable prospect that it will be available for and could be developed at a specific point in time.
- **Not currently developable** is where it is unknown when a site could be developed, for example, because one of the constraints to development is severe, and it is not known when it might be overcome.

7.2 The developability of identified sites, including all CSA sites, has been assessed by a Panel made up of a range of professionals involved in planning/housing delivery within the Cheltenham area, including: members of the Home Builders Federation; Registered Social Landlord; a local property agent; Environment Agency; Natural England; and Cheltenham Borough Council officers.

7.3 Panel members received a portfolio of all sites for comment and a half day discussion was held at the Council offices. The purpose of the consultation was for the Panel Members to make their recommendations to the council as to whether and when a site was likely to come forward, whether it was achievable and suitable for housing. A summary of the Panel's comments for each site and the Council's view can be found in Appendix C and information on consultation with the Panel in Appendix G.

7.4 This information has been used to inform the categorisation of sites into 'deliverable', 'developable' or 'not currently developable' which will be considered further at the plan making stage. **It is not the purpose of the SHLAA to make the final judgement regarding sites.** For example, whilst a site may be categorised as 'not currently developable' in the SHLAA, through the plan preparation a constraint may be removed to enable the site to be able to be categorised as 'developable'. See Appendix C for categorised sites.

Summary of Panel's view

- 7.5 Panel Members considered that the majority of the identified sites were suitable for housing and could be attractive to the market. However, a key constraint for a number of identified sites was that of existing policy restrictions and the loss of significant employment, retail or car parking uses, which was felt could adversely impact on Cheltenham as a regionally significant town. These issues have been identified as constraints within Appendix C.
- 7.6 The Panel Members considered the current market within Cheltenham, questioning whether there was market support for high density flat/apartments developments. Panel members were clear that any sites with flood risk concerns would not be attractive to the market, and indeed certain parts of the town are not as attractive to the market as others. There was not always agreement amongst Panel Members in terms of the market attractiveness of identified sites and it is important to remember that different types of sites and locations may be attractive to different markets. For instance, a small site may be unattractive to large developers but attractive to small developers. Trends on development of sites, large and small, will be monitored through the RLA
- 7.7 The Environment Agency stressed the importance of assessing potential sites alongside the Strategic Flood Risk Assessment (SFRA). The SFRA, is currently being produced and will provide a comprehensive picture of flood risk from all sources of flooding. At the plan preparation stage, the SFRA, along with other evidence base documents, will need to be considered against each other and this may result in some sites being found unsuitable for residential development and becoming 'not currently developable' due to flood risk.
- 7.8 Natural England was concerned about the potential loss of greenspace and was keen to ensure that access to greenspace should be readily available to all residents. At the plan preparation stage, the Green Space Strategy evidence base will be considered against the sites and this may result in some sites being found unsuitable for residential development and becoming 'not currently developable'.
- 7.9 The Council is grateful to the Panel Members for their time and recommendations on the identified sites. The recommendations made by the Panel Members have been considered by the officers and a summary of the Panel's comments and officer's responses can be seen in Appendix C. The Panel Members comments relating to peripheral Greenfield sites being assessed within CSA will be included within future SHLAAs.

8 Summary of Results

- 8.1 The previous sections have identified the potential sites, and the *total* potential capacity, within each source. In considering the identified sites and all available information, the SHLAA has made an initial assessment of when and whether sites may be likely to come forward and has categorised sites into 'deliverable', 'developable' and 'not currently developable' by each source of supply.
- 8.2 Table 3 below shows the results for each potential source of supply and the amount which might be expected to come forward. This should be read in conjunction with Appendix C.

Source	Deliverable	Developable	Not Currently Developable
Sites in the planning process			
Land allocated or with permission for employment or other land uses which are no longer required	0	0	0
Existing housing allocations and site development briefs	806	100	388
Unimplemented/outstanding planning permissions	1276	0	0
Planning permissions for housing under construction	365		0
Sites not currently in the planning process			
Vacant and derelict land and buildings	34	603	0
Surplus public sector land	509	59	96
Land in non-residential use which may be suitable for housing	176	427	0
Opportunities in established residential areas	0	45	0
Large scale redevelopment and redesign of existing residential areas	20	0	14
Total	3,186	1,234	498

Table 3: Potential capacity of identified sites and when they may come forward

- 8.3 As the SHLAA is considering only the PUA at this stage, the relevant draft RSS housing requirement is for 6,500 dwellings to be provided within the urban area over the period 2006 – 2026.

Draft RSS Requirement within urban area	6,500
Per annum requirement	325
5 year requirement	1,625
Further 10 year requirement	3,250
Total 15 year requirement	4,875

Table 4: Draft RSS Urban Housing Requirement

8.4 The following table shows the number of deliverable and developable sites identified within the SHLAA.

Deliverable sites	3,186
Allocated sites	806
Unallocated sites	739
Planning applications n/s & u/c	1,641

Developable sites	1,234
Allocated sites	100
Unallocated sites	1,134
Planning applications n/s & u/c	0

Total identified supply	4,420
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Identified shortfall within 15 year requirement	455
Per annum, over 15 year period	30

Table 5: Draft SHLAA results for Urban Area

8.5 As can be seen from the above table, when considering the number of identified, deliverable sites against the draft RSS requirements, Cheltenham has a 9.8 year supply, therefore adequately meeting the 5 year supply of sites and just falling short of a 10 year supply. Over the total 15 year period, the SHLAA identifies a shortfall of 455 dwellings, which equates to 30 dwellings per annum. It is considered that this shortfall can be met in considering acceptable broad locations for growth.

8.6 It should be noted that over the 20 year period of the Regional Spatial Strategy there is a projected shortfall of 2,802, this shortfall will need to be considered by Cheltenham's LDF.

9 Broad locations for growth

- 9.1 Broad locations are determined by the guidance as locations where housing is considered feasible and will be encouraged, but where specific sites cannot yet be identified.
- 9.2 During the Panel Members discussion, areas of the town centre were identified which could contribute to residential requirement through mixed use regeneration of town centre areas. Whilst it is not possible to say with any certainty when such redevelopment may happen it is reasonable to assume that development within the town centre would be considered acceptable and be attractive to the market, subject to the right proposal.
- 9.3 In considering locations for additional development, it is considered that, in addition to the town centre, the wider PUA would form a broad location where growth would be acceptable, subject to appropriate proposals. There are likely to be sites, particularly smaller sites or infill sites, which have not been able to be specifically identified within the SHLAA but which may still come forward. See plan showing the broad location for growth in Appendix H.
- 9.4 It is considered that past rates of development within Cheltenham support this assumption, as shown in Table 6. The large majority of these completions have come forward consistently on windfall sites within the PUA and the chart below shows that the largest sources of supply in the past have been 'Other Redevelopment' and 'Change of use'.

Year	1999	2000	2001	2002	2003/ 04	2004/ 05	2005/ 06	2006/ 07	Total
Completions	319	523	365	420	681	505	460	1012	4,285
Losses	1	76	32	22	242	17	22	79	491
Net change	318	447	333	398	439	488	438	933	3,794

Table 6, Number of residential completions, losses and Net gains each year, Residential Land Availability Report 2007

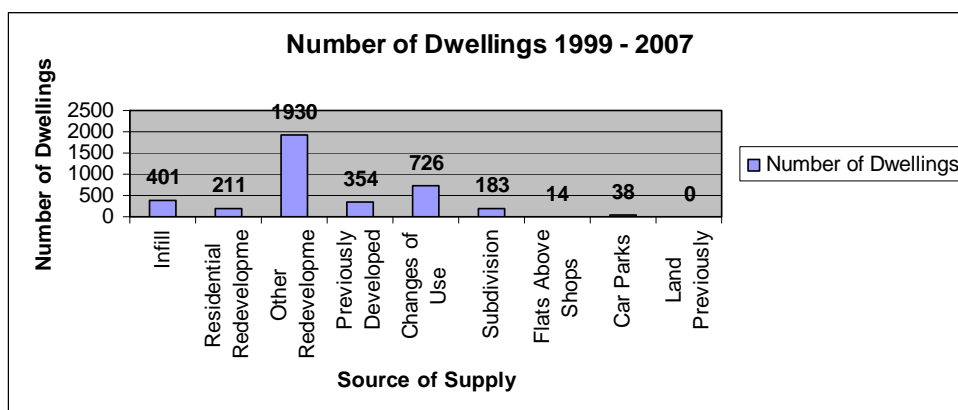


Chart 1: Past rates of residential completions, by source, for the period 1999 – 2007

- 9.5 The rates of expired planning permissions over the same period have been consistently low, and it is considered that this trend will continue, as can be seen in Table 7 below.

Year	1999	2000	2001	2002	2003	2004	2005	2006	2007	Total
No.	4	29	0	15	6	6	11	14	15	100

Table 7: number of expired dwellings in Cheltenham borough, for period 1999 to 2007

- 9.6 Appendix I, includes a projection of past rates of development on an annual basis. It is acknowledged that future rates of development can not merely be projected forward, as various factors will affect future rates of development, including local build rates, land values, the demand for housing, the reservoir of potential opportunities, local planning policies etc. However, in considering past development rates, the past rate of expiries and the projections it is considered reasonable to assume that, at least, 30 dwellings per annum would continue to come forward on unidentified sites within the PUA, and therefore meet the Draft RSS requirement for the urban area over a 15 year period. See Appendix K for the housing trajectory which sets out anticipated dwelling figures per annum.
- 9.7 The CSA will assess the potential suitable broad locations for growth on peripheral greenfield sites, if any, in addition to the areas identified within the draft RSS.

10 Determining the housing potential of windfalls

10.1 Windfalls are those development sites which have not been specifically identified as available but which become available unexpectedly, for example, as a result of a factory closure or a new flat over a shop. By their very nature it is impossible to predict when and where such sites may become available.

10.2 Windfalls should not be included within SHLAAs unless there are genuine local circumstances which would mean a windfall allowance is justified; CLG is due to publish additional guidance on this. Whilst uncertainty surrounds potential locations, it is reasonable to assume that windfalls will continue to happen and although the SHLAA does not rely on a windfall projection as a sufficient amount of sites and an acceptable broad location have been identified. The situation of windfalls will be monitored through the RLA and will be updated, as appropriate, within future SHLAAs.

11 Monitoring and updating of the assessment

11.1 The SHLAA is not intended to be a one-off study as situations on individual sites will be subject to change and the SHLAA will be updated at least annually. As a comprehensive assessment has been undertaken for the SHLAA, it is not anticipated that a full re-survey would be required within future updates, unless there has been a significant change within the borough, such as no longer being able to demonstrate a 5 year supply, the plan is to be reviewed or there is a change in policy direction nationally, regionally or locally that would result in the release of land or sites within identified sources of supply.

11.2 The main reason to update the assessment will be to consider whether:

- Sites under construction have now been developed;
- Sites with planning permission are now under construction;
- Planning applications have been submitted or approved on sites and broad locations identified within SHLAA;
- Progress has been made in removing constraints on development and whether a site is now considered to be deliverable or developable;
- Unforeseen constraints have emerged which now mean a site is no longer deliverable or developable and how these could be addressed;
- Whether any windfall allowance is coming forward as expected, or may need to be adjusted; and
- Whether any new sites have been identified.

12 Next Stage

- 12.1 Additional sites being assessed as part of the CSA which are identified with potential for residential development will be included within the updated SHLAA, expected later 2008, to provide a comprehensive assessment of potential housing sites across the borough.