

**CHELTENHAM GREEN BELT REVIEW**

**Final Report**

**of**

**Applied Environmental Research Centre Ltd**

**to**

**Cheltenham Borough Council**

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***Title: Cheltenham Green Belt Review***  
***Report Ref: J8901/R2569***

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## EXECUTIVE SUMMARY

### Introduction

1. The Planning and Compulsory Purchase Act 2004 introduced a new system of planning, making local planning authorities responsible for preparing and reviewing Local Development Frameworks which will progressively replace Local Plans.
2. Cheltenham Borough Council has commenced preparation of its Local Development Framework that will supersede the Cheltenham Borough Local Plan in accordance with the revised Town and Country Planning Act.
3. The responsibility for reviewing the Green Belt within Cheltenham for the new Local Development Framework, however, falls on Cheltenham alone, and the Borough Council has therefore appointed consultants to provide independent advice on the Green Belt to input into the Core Strategy. Applied Environmental Research Centre Ltd (AERC) was appointed to carry out the review.
4. The Review has been informed by extensive consultation with Tewkesbury Borough Council, Gloucester City Council, and Gloucestershire County Council, and officers of the South West Regional Assembly.
5. The Detailed study area was defined as all of the Green Belt within Cheltenham Borough and land between the inner Green Belt boundary and the urban area. This included land within the Area of Outstanding Natural Beauty (AONB) where this was closest to the existing defined Green Belt within Cheltenham, designated unallocated land, and pockets of green space on the edge of Cheltenham.
6. A wider study area, which included land in Tewkesbury Borough, was also identified, and views were sought from consultees on the implications of the study for the wider area.
7. In order to ensure that the requirements of the regulations governing the preparation of Local Development Documents were met as set out in the Council's Local Development Scheme, particular attention was given to a programme of community involvement, facilitated by AERC's team.
8. The Policy Context was researched and it was noted that there is a draft Regional Spatial Strategy that seeks substantial new development in Cheltenham Borough.

### Findings

9. To undertake the assessment of the performance of the Cheltenham Green Belt against the defined purposes, the Study Area was divided into sub areas for each zone of the Green Belt. Each sub area included land of a similar character which respected important boundaries and features within them.
10. Each sub area was scored against each of the five Green Belt purposes using measurable criteria to define each purpose. The resulting totals for each sub area were weighted and ranked in order to reflect the relative local importance of the purposes.
11. The Review demonstrates that within the detailed Study Area all the Green Belt land assessed by the study contributes to the achievement of Green Belt purposes. A

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- number of the sub areas (15) contribute significantly more to achieving Green Belt purposes than the others (63).
12. The ranking of the purposes used in the assessment reflect the view (shared by stakeholders) that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, and checking urban sprawl.
  13. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve generally contributes more to achieving Green Belt purposes than other areas. Sub-areas to the north-west and west of Cheltenham scored lowest against Green Belt purposes.
  14. The Study concludes that of the four existing Green Belt policies within the Local Plan, three policies, CO48, CO50 and CO51, contribute positively to Green Belt purposes, pass the relevant "Tests of Soundness" required by Planning Policy Guidance 12, and are "fit for purpose" for inclusion in the emerging Local Development Framework.
  15. The fourth Green Belt policy, policy CO49, is capable of contributing to Green Belt purposes and being 'sound' if minor amendments are made to it.
  16. One non-Green Belt policy in the Local Plan, policy TO113 relating to Cheltenham Racecourse, could also contribute to Green Belt purposes, and could be included in the emerging Local Development Framework as a Green Belt Policy subject to restrictions on the use of the land, and the type and area defined for associated development. The key sub regional role of the Racecourse within the Green Belt was identified and should be recognised in the LDF.
  17. Constraints to future development were considered to be either 'hard constraints' – those constraints which are considered to effectively preclude development in the future – and 'soft constraints' – constraints which are considered could provide justification not to develop the land but which are not insurmountable.
  18. The study shows that the Area of Outstanding Natural Beauty affects sub areas to the east whilst the flood risk areas affect sub areas on the north and north-west of Cheltenham. Development exclusion zones affect areas to the north and west.
  19. If the Development Exclusion Zone at Fiddlers Green were to be reduced in area in consultation with other agencies and Tewkesbury Borough Council, it may enable future sustainable development to be planned in this area.
  20. Future patterns of sustainable development in Cheltenham will need to embrace sustainability objectives in the context of local sustainability criteria. Sustainability criteria were identified which applied the national sustainability objectives and which could provide a guide to future patterns of sustainable development.
  21. The results provide guidance on potential future patterns of sustainable new development which would need to be the subject of much wider consideration and rigorous assessment as part of the Sustainability Appraisal of the emerging Local Development Framework.
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22. A number of general locations to the west of Cheltenham satisfied more than two sustainability criteria, as did land at close to Swindon Village and the Racecourse, and adjoining Prestbury Village and Leckhampton.
  23. The review considered how defensible Green Belt boundaries were and identified where the existing inner Green Belt boundaries were 'weak'. A search was made for potential Green Belt boundaries within the Study Area which would be 'strong' in terms of their defensibility and which could be physically linked to existing boundaries. Potential Green Belt boundaries in the wider Study Area were also considered.
  24. The assessment determined that much of Cheltenham's inner Green Belt boundary is strongly defensible for the foreseeable future. This may be in part due to the establishment of boundaries over a long period of time. The entire inner boundary in Zone A is considered to be strongly defensible, together with some 70% in Zone B, 80% in Zone C, and 75% in Zone D. Most of the boundaries in Zone E are likely to be 'strongly' defensible.
  25. The review of 'weak' boundaries and potential alternative 'strong' Green Belt boundaries found no potentially 'strong' boundaries that could be readily physically linked to existing boundaries. The stakeholder workshops generally endorsed this view.
  26. The emerging Local Development Framework will need to establish defensible boundaries for the Green Belt and any new Green Belt boundaries would have to be "created". In practice they would need to be "masterplanned" using for instance structural planting and new road corridor design in order to create a new 'strongly' defensible Green Belt boundary in such locations.
  27. Boundaries in the very long term beyond 2026 would need to be determined using a similar process to the current Review, but preferably carried out jointly particularly between the authorities of Cheltenham and Tewkesbury. The timing of such a review could be based on the Review of the RSS after 2020 and feed into the review of Cheltenham and Tewkesbury's Local Development Frameworks.
  28. When the results of the various analyses are combined those areas that contribute least to Green Belt purposes are not necessarily in the areas which would be the most sustainable for future development, and major constraints also affect some areas that score poorly against Green Belt purposes.
  29. The Study should provide a robust evidence base for the Cheltenham Local Development Framework in respect of Green Belt and assist Cheltenham Borough Council in discussions with neighbouring authorities on future development patterns.

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## **1. INTRODUCTION**

### **1.1 Background**

- 1.1.1 The Planning and Compulsory Purchase Act 2004 introduced a new system of planning, making local planning authorities responsible for preparing and reviewing Local Development Frameworks which will progressively replace Local Plans. Within each Local Development Framework, local planning authorities are required to prepare Local Development Documents which provide planning policies and proposals for their area.
- 1.1.2 Cheltenham Borough Council has commenced preparation of its Local Development Framework that will supersede the Cheltenham Borough Local Plan in accordance with the revised Town and Country Planning Act.
- 1.1.3 Along with other local planning authorities required to replace their Local Plans, Cheltenham is starting the process with the preparation of a strategy (the Core Strategy) to determine where and in what form future development should take place in the Borough. This strategy must, however, conform with the emerging review of the existing South West Regional Spatial Strategy which is part of the statutory Development Plan for the area and will ultimately replace the County Structure Plan. The reviewed Regional Spatial Strategy will affect the Green Belt as presently defined around Cheltenham and Gloucester.
- 1.1.4 A key task in deciding where and when new development should take place is to consider the impact of these new developments on the Green Belt, which is defined in National Planning Policy Guidance (Note) 2 (PPG2) (published in June 1992). It is important to take into account the Green Belt's historic and current context, and in particular how it performs with respect to the role and purposes defined by PPG2. Furthermore, it is wise to take into account the Green Belt's changing role over time and its geographical extent.
- 1.15 In order to be as well informed as possible in carrying out the above tasks, Cheltenham contributed, together with the other planning authorities affected by the Cheltenham and Gloucester Green Belt, in a reassessment of the Green Belt to assist the preparation of the draft Regional Spatial Strategy. Section 2.4 describes the sub-regional Green Belt Study.
- 1.1.6 The responsibility for reviewing the Green Belt within Cheltenham for the new Local Development Framework, however, falls on Cheltenham alone, and the Borough Council has therefore appointed consultants to provide independent advice on the Green Belt to input into the Core Strategy. Applied Environmental Research Centre Ltd (AERC) was appointed to carry out the review. The review started in October 2006 and the final report was submitted in March 2007.

### **1.2 Scope of Study**

- 1.2.1 The scope of the study to be undertaken by consultants was set out in a Project Brief by Cheltenham Borough Council and refined in discussion with the Council's officers and the Leader and Cabinet Deputy (Environment) at the early stage of the project. The key objectives and the principal tasks required of consultants can be found in Appendix A1.1.



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- 1.2.2 At an early stage Cheltenham undertook consultation with Tewkesbury Council to investigate the possibility of undertaking a joint Green Belt review. The timing of the study was not considered appropriate for Tewkesbury Borough Council, therefore a joint study could not be progressed. The Green Belt is fundamental to the planning of Cheltenham and given that Cheltenham is required to prepare a Core Strategy in 2007, it was considered that the review could not wait.
- 1.2.3 The Review has been informed by extensive consultation with Tewkesbury Borough Council, Gloucester City Council, the officers and councillors of Gloucestershire County Council and officers of the South West Regional Assembly.
- 1.2.4 The Study Area was defined in two different ways according to the tasks to be undertaken. Firstly, the detailed Study Area was defined to be all areas within Cheltenham Borough that were not considered to be urban. This included the Area of Outstanding Natural Beauty (AONB) land where this was closest to the existing defined Green Belt within Cheltenham, designated unallocated land, and pockets of green space within Cheltenham that had at least one continuous 'open' boundary with the Green Belt.
- 1.2.5 Zones (identified as A, B, C, D, E, F, and G) were established (see Figure B), consistent with the zones identified in the Gloucester and Cheltenham Green Belt Review (see Section 2.5 for more information) to allow the Council consistency when evaluating future land use change. Sub-areas within each zone were then established and appointed a unique identifier comprising the Zone letter and a number. Maps were used to define each sub area, ensuring each had a physical boundary, and current land uses and characteristics consistent within each individual sub area.
- 1.2.6 Secondly, a wider study area, which included land in Tewkesbury Borough, was also identified (see Figure A), and views were sought from consultees on the implications of the study for the wider area so as not to unnecessarily constrain their ideas on how the Green Belt might evolve in the future, and in order to ensure that the study took into account of the wider implications of advice on land rather than within Cheltenham alone.
- 1.2.7 The above considerations were essential because of the proximity of the Borough boundary to the inner edge of the Green Belt, particularly to the south-west of Cheltenham.

### **1.3 AERC Role**

- 1.3.1 The role of the consultancy team was determined by the scope of the Project Brief. At the start of the Review in October 2006 the necessity of providing independent objective advice, and of carrying out the review in five principal stages in accordance with a transparent methodology, were agreed, as were the principal outputs.
- 1.3.2 In order to ensure that the requirements of the regulations governing the preparation of Local Development Document's were met as set out in the Council's Local Development Scheme, particular attention was given to a programme of community involvement, facilitated by AERC's team.
- 1.3.3 Community involvement including stakeholder workshops also informed and influenced the methodology used to undertake the study including the ranking of Green Belt purposes. Section 7 describes this in more detail.

## **1.4 Programme**

- 1.4.1 A programme divided into five stages was agreed between the Council and AERC and was drawn up based on the requirements of the Project Brief. The original intention was for completion of the Final report by the end of January 2007. However the inclusion of much more extensive consultations than initially provided for has resulted in the completion of the final report by the beginning of March 2007.

## **1.5 Report Content**

- 1.5.1 This report is set out in the following Sections:

Section 1	Introduction.
Section 2	Context.
Section 3	Policy Analysis.
Section 4	Green Belt Role and Purposes.
Section 5	Constraints and Sustainable Development Opportunities.
Section 6	Green Belt Boundary Review.
Section 7	Community Involvement.
Section 8	Conclusions.

- 1.5.2 Appendices and plans are provided on various technical elements of the study and on the consultations.

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## 2. CONTEXT

### 2.1 Introduction

2.1.1 This section of the Report outlines the context within which the Cheltenham Green Belt Review was undertaken by AERC, particularly the emerging regional and sub-regional strategies, and the studies previously undertaken of the Cheltenham and Gloucester Green Belt.

### 2.2 National Policy

2.2.1 The starting point for any review of Green Belt is national Green Belt policy. Originally introduced in the 1930s in south east England, the use of Green Belts to prevent unsuitable development in locations inconsistent with sound planning principles became national policy in the 1950s. At that time strategic planning authorities were instructed to define Green Belts to achieve specific Green Belt purposes around specified towns and cities in accordance with Government Circular 42/55. The Gloucestershire Green Belt was one such area.

2.2.2 The popularity and success of Green Belts has resulted in them remaining a fundamental part of national planning policy, and the recasting of national policy in Planning Policy Guidance Note (PPG) 2 in 1992, which still sets out national Green Belt policy.

2.2.3 The most important element of national policy as set out on PPG2 is the definition of the five purposes<sup>1</sup> of Green Belts. All these Green Belt purposes are of equal importance in national planning policy terms and are set out below:

- to check unrestricted sprawl of development;
- to prevent nearby towns from merging;
- to safeguard countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist with urban regeneration by the re-use of land within urban areas.

2.2.4 The extent to which these purposes apply to the Green Belt around Cheltenham is considered later in Section 4.7.

2.2.5 PPG2 also sets out objectives for Green Belts which local planning authorities are to encourage or promote, including their use:

- as public open space;
- for sport and recreation;
- for nature conservation;
- to protect landscape, agriculture and forestry; and
- to improve derelict land.

2.2.6 These purposes and objectives have been taken into account in developing AERC's methodology for the Green Belt Review. The methodology recognises that the planning system needs to accommodate entirely different environmental concerns than were relevant some fifty years ago when the concept of green belts was in its infancy. The review has taken account of the need for the Green Belt to be relevant

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<sup>1</sup> Paragraph 1.5. National Planning Policy Guidance Note 2: Green Belts 1992.

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to the planning of sustainable development in the 21<sup>st</sup> Century and restricting urban sprawl in favour of new planned developments. This is consistent with the new requirement for local planning authorities to manage and monitor change rather than predicting and providing for new development.

- 2.2.7 Notable in its omission from PPG2, as a result of the PPG pre-dating more recent Government strategies and policy, is recognition of the significance and importance of sustainable development and the role of the town and country planning system in delivering this. The primary focus of the Review has of necessity been the defined purposes of Green Belts as set out in what currently constitutes national policy, but consideration has also be given to potential for sustainable development in accordance with the Study Brief. The study therefore identifies general areas which satisfy suggested sustainability criteria and which potentially could accommodate future patterns of sustainable development. This part of the study was also informed by the stakeholder consultation.
- 2.2.8 However PPG 2 specifically relates Green Belt definition and review to the development plan system and its process of review. This is not changed by the new system of Local Development Frameworks.

### **2.3 The Barker Review**

- 2.3.1 The Government have commissioned Kate Barker to review the planning system – firstly to review how better to accommodate increasing demand for housing, and secondly, to see how it could more effectively achieve economic growth and prosperity alongside other sustainable development goals in the delivery of sustainable communities.
- 2.3.2 Her first report was entitled “Review of Housing Supply: Delivering Stability Securing Our Future Housing Needs” it was issued as a Final Report in March 2004 and considers how best to accommodate the nation’s housing needs.
- 2.3.3 The Housing Report makes a number of recommendations regarding how to ensure an adequate supply of housing land in the future, including:
- allocating more land for development does not require removing all restraints on land use and more attention is required to identify major constraints to development;
  - there is need for a stronger role for regional planning bodies and an independent Regional Planning Executive charged with setting out advice which covers housing numbers, market affordability targets, strategic growth areas and coordination links with key players;
  - the provision of major infrastructure to ensure the development of sustainable communities is an important role for regional planning bodies and local authorities;
  - alternative routes to gaining planning permission at the local level are proposed which speed up the process;
  - land will only get developed if the right incentives are in place for making development decision; and
  - a key role needs to be played by English Partnership in delivering development by assembling land and managing issues around complex sites.

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- 2.3.4 Her second Interim Report, “The Barker Report”, was published in December 2006 and is the subject of further public consultation and consideration by Government and will lead to the publication of a second White Paper in Spring 2007.
- 2.3.5 The Interim Report confirms that economic objectives should not be pursued above other sustainable development objectives. The report also recognises that the Green Belt is an important planning tool which has a vital part to play in achieving a number of different planning objectives, including supporting regeneration and preserving the character of historic towns.
- 2.3.6 The Interim Report makes a number of important points regarding Green Belts and their review including:
- Green Belts have played a major role in checking the unrestricted urban sprawl of large built up areas;
  - Without Green Belts the various benefits of urban containment – including urban regeneration and efficient use of urban infrastructure – would be much harder to achieve;
  - There is considerable general public support for the concept of Green Belts;
  - Different areas have different needs and Green Belt policy should be sensitive to the impacts in each specific case;
  - There is a need to make Green Belt policy work better – including using land close to transport nodes for sustainable new development and increasing the recreational use of Green Belt land;
  - In a number of areas Green Belt boundaries and rightly being reviewed to accommodate growing pressures for sustainable new development;
  - There is an increased need for Green Belt reviews – to ensure that the essential integrity of Green Belts is maintained and that new development is genuinely sustainable; and
  - Green belt reviews should be aimed at making Green Belts better achieve their purposes whilst accommodating sustainable new development.
- 2.3.7 The present study provides an opportunity to review performance of the Cheltenham Green Belt against its purposes in the context of the need to accommodate future sustainable development.

## **2.4 Regional Strategy**

- 2.4.1 Regional Spatial Strategies are a new approach to planning, as they are spatial and functional in approach. Preparation of Regional Spatial Strategies is a positive response to the Government's challenge to build sustainable communities. The very essence of this Regional approach enables a comprehensive study of a large range of existing demand centres to be matched against projected growth studies, different policy focuses, and national and international initiatives. Planning Policy Statement 11, “Regional Planning”, sets the context for the preparation of Regional Spatial Strategies and the Government's requirement to establish sustainable new development is set out in the Sustainable Communities Plan of 2002.
- 2.4.2 Regional Spatial Strategies are an important part of the plan making process and form a statutory part of any development plan. Cheltenham's Local Development

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Framework will be expected to be in conformity with the South West Regional Spatial Strategy.

- 2.4.3 The South West Regional Spatial Strategy (June 2006), identifies Cheltenham as one of the Region's 21 Strategically Significant Cities and Towns (SSCTs), thus is expected to be the focus of future economic activity with access to sustainable transport and the feasibility to accommodate population growth sustainably. It is predicted that Cheltenham will have to accommodate upwards of 10,750 new employment opportunities and 12,500 homes over the next 20 years.
- 2.4.4 The draft Regional Spatial Strategy sets out that Cheltenham's urban area can accommodate over half of the anticipated housing demand. To accommodate the remaining 6,000 dwellings required within the next 20 years<sup>2</sup>, Cheltenham Borough Council must consider land outside the urban area. As Cheltenham is surrounded by Green Belt and Area of Outstanding Natural Beauty (AONB) land designations, the Borough is severely restricted. In order to determine the best, most sustainable path forward, Cheltenham Borough Council has been developing an evidence base, to guide future planning decisions. This evidence base includes undertaking Green Belt studies, (described in Section 2.5) and the results of the findings of this will be considered alongside a comparative assessment of potential development sites, housing land availability assessment, employment land audit, transport modelling, strategic environmental assessment and sustainability assessment. Comments arising from extensive public consultation undertaken during the summer and autumn of 2006 will also be taken into account in developing the long term development strategy for Cheltenham.

## 2.5 Sub-Regional Study: Gloucester / Cheltenham Green Belt Review

- 2.5.1 The South West Regional Assembly asked the Gloucestershire County Council along with the six District Councils and other organisations to look at how best to accommodate anticipated development over the next twenty years. The outcome of this consultation informs the developing Regional Spatial Strategy (the Public Examination of the Draft RSS starts in April 2007). This consultation included establishing a Joint Study Area Steering Group and undertaking a Green Belt review.
- 2.5.2 The Joint Study Area Steering Group comprises members of the following organisations:
- Gloucestershire County Council (as the 'lead authority');
  - Cheltenham Borough Council;
  - Tewkesbury Borough Council;
  - Gloucester City Council;
  - Campaign for the Protection of Rural England;
  - Community Volunteer Services;
  - Cotswold District Council;
  - Forest of Dean District Council;
  - Gloucestershire First;
  - Gloucestershire Strategic Partnership; and
  - Stroud District Council.

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<sup>2</sup> As indicated in the Draft Regional Spatial Strategy for the South West 2006 – 2026.

- 2.5.3 The Joint Study Area Steering Group established a Green Belt Working Group to examine the purpose of the Gloucester/Cheltenham Green Belt, strategically. The approach taken was to identify the meaning behind PPG2's five identified Green Belt purposes (see Section 2.2 for a list of the purposes) and then to determine, through site visits, the effectiveness of the respective Green Belt. It is important to understand that the intended use of the results was to identify strategic options for future development discussions; boundary definitions were not addressed.
- 2.5.4 The Gloucester/Cheltenham Green Belt Review identified 13 sectors, six surrounding Cheltenham. The Working Group scored<sup>3</sup> each of the sectors against their importance in fulfilling the PPG2 Green Belt purposes (as identified in Section 2.2) using the group's definitions. The results for Cheltenham Borough are identified in Table 2.1

**Table 2.1: Results of Gloucester/Cheltenham Joint Study Area Working Group on Green Belt <sup>a</sup>**

<b>Purpose Location</b>	<b>Preventing Sprawl</b>	<b>Preventing Towns Merging</b>	<b>Safeguarding Countryside</b>	<b>Historic Setting</b>	<b>Encourage Recycling</b>
South-west of Cheltenham	0	1	1	0	1
West of Cheltenham (Golden Valley Area)	0	2	1	0	1
North-west of Cheltenham	0	0	0	0	1
North of Cheltenham (Bishop's Cleeve Gap)	0	1	1 (Hunting Butt's Gap)	0	1
East of Cheltenham	0	0	2	1	1
South of Cheltenham	0	0	2	1	1

<sup>a</sup> Cheltenham areas only identified in Table.

- 2.5.5 Three areas received the highest scores, four out of a possible ten. They include West of Cheltenham (Golden Valley Area), East of Cheltenham and South of Cheltenham. It was determined that no Green Belt location contributed to the prevention of urban sprawl, and only two sections were moderately important in maintaining Cheltenham's historic setting. The area toward the North-West of Cheltenham scored lowest - only receiving one point demonstrating its usefulness in encouraging recycling within Cheltenham's urban area.
- 2.5.6 The Working Group considered that the Green Belt contains more land than is necessary to prevent the convergence of Gloucester and Cheltenham. Special attention was provided to the area to the North-West of Cheltenham as the exercise's results demonstrated that did it not contribute significantly towards Green Belt value.

<sup>3</sup> The scoring system used was; 0 - little or no importance; 1 – some importance; 2 – high importance.

2.5.7 The study also identified the area in the Cotswold escarpment, along the eastern edge of Cheltenham, as potentially being a valuable addition to the Green Belt as its inclusion would provide extra protection to the open countryside and contribute to the maintenance of Cheltenham's historic setting.

## 2.6 Colin Buchanan Strategic Green Belt Review

2.6.1 Colin Buchanan Associates conducted a Strategic Green Belt Review for the South West Regional Assembly with the final results published in February 2006. The thrust of this exercise was to advise on a robust methodology for a strategic, consistent and independent review of Green Belts across the South West and to undertake an assessment of the technical work on the region's three Joint Study Area's<sup>4</sup> Green Belts reviews.

2.6.2 The Buchanan Review identified a methodology, described below, that should be undertaken when examining Green Belts which is based on 'best practice'. If all Joint Study Areas in the South West incorporated this method into their Green Belt review it would ensure a sound, consistent evidence for shaping the South West Regional Spatial Strategy. This methodology was also used as a critique to the existing Green Belt reviews. The methodology involves:

- document review (national, regional and local policy, and assessment of good practice);
- definition of purpose (establishing the importance of PPG2 purposes and ranking them accordingly, and establishing a scoring system);
- establishment of sustainability criteria and search area database (identify areas with which to score and criteria to score against); and
- application of criteria to search area database (score the search areas and analyse results).

2.6.3 The Buchanan Review provided the following critique on the Cheltenham and Gloucester Joint Study Area Green Belt Review:

Document Review:	“Did not provide a comprehensive document review that succinctly sets out national and regional policy, considers 'best practice' or outlines the original purposes of the Green Belt or reviews the effectiveness of the Green Belt.”
Definition of Purpose:	“A detailed explanation as to why particular purposes are attributed to areas/parts of the Green Belt including sensitivity to change needs to be provided”.
Establishment of Sustainability Criteria and Search Area Database:	“Cheltenham and Gloucester need to examine our interpretation of delineation and clarify extent of zones and provide details as to the rationale for site location.”
Application of Criteria to Search Area Database:	“The approach used to review the Green Belt was sound and methodical but more explanation is required for the reader to fully understand how the points were allocated”.

<sup>4</sup> The Three Joint Study Areas include the West of England, South East Dorset, and Cheltenham and Gloucester.



2.6.4 The Buchanan Report also reviewed a technical report, prepared by the Cheltenham and Gloucester Joint Study Area, describing environmental constraints. These include:

- Floodplain;
- Areas of Outstanding Natural Beauty;
- Waste sites;
- Sites of Special Scientific Interest;
- Important local ridge lines; and
- Critical landscape wedges.

2.6.5 In summary, the Buchanan Report identified the scoring system used by the Cheltenham and Gloucester Joint Study Area as providing a relatively methodical and sound approach to reviewing Green Belt purposes. However, the lack of transparency was recognised as being problematic as it provides the reader with no information on how each study area was awarded points.

## 2.7 Best Practice

2.7.1 Before developing a suitable methodology for completing the review, research was undertaken of Green Belt Review 'best practice' to see whether any of the adopted methodologies were appropriate for the Cheltenham Review. The reviews considered were:

- The Cambridge Green Belt Review;
- The Nottingham – Derby Green Belt Reviews;
- The Purbeck Green Belt Review; and
- The Buchanan Strategic Green Belt Review.

2.7.2 The Cambridge Green Belt Review and the Nottingham – Derby Green Belt reviews were assessed as possible examples of 'best practice' in terms of the methodologies used. The Cambridge Green Belt Review had the advantage of being subject to Examination in Public and led to significant changes being made to the Cambridge Green Belt including identifying land releases for future development.

2.7.3 However none of these reviews proved entirely appropriate for the Cheltenham Review. Notwithstanding the provenance of the Cambridge Green Belt Review, its methodology appeared to be over- reliant on landscape quality and visual criteria which do not take account of the purposes of the Green Belt. Additionally the methodologies used for the Nottingham–Derby reviews were not sufficiently transparent – for instance, by using measurable criteria.

2.7.4 The Green Belt Review completed for Purbeck District Council in South East Dorset was both contemporary (having been completed in June 2006) and falls within the area of the draft Regional Spatial Strategy for the South West. However the methodology was over- reliant on a limited number of criteria and was not well related to the purposes of the Green Belt.

2.7.5 Additionally the Buchanan Report reviewing Green Belt within the South West Region provided a regional perspective but did not use a methodology which was sufficiently transparent by using measurable criteria.

- 2.7.6 Research of the Royal Town Planning Institute database on Green Belt reviews revealed a similar lack of reviews which could be considered as exemplars for the Cheltenham review. For instance, no reviews employed suitable methodologies which used measurable criteria related specifically to performing the different purposes of green belts. The reason for this is unclear but may be because review of green belts as part of the Local Development Framework process is still in its infancy. In this regard Cheltenham is leading the way in developing 'best practice'.
- 2.7.7 This research established that there was no appropriate model for preparing a methodology for undertaking the Cheltenham Green Belt Review. It was therefore decided to develop a methodology which directly related the review to the Green Belt purposes and using measurable criteria. This methodology was made transparent and appropriate to the local circumstances of Cheltenham. The methodology is detailed at section 4.5.

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### **3. POLICY ANALYSIS**

#### **3.1 National Policy**

3.1.1 The purpose of this Section is to assess the effectiveness of Cheltenham's Green Belt policies over time and its ability to meet Regional and National Green Belt Policy objectives. The findings of this report are a result of analysis of current and historic National, Regional, and Local Plans and associated maps<sup>5</sup>. This section also looks at Cheltenham's Green Belt policies since its designation to determine if they are consistent with PPG2.

3.1.2 National policy required Green Belts in various parts of the Country to be identified in County Development Plans, and later in Structure and Local Plans after 1968.

3.1.3 Once a Green Belt is established, its permanence is of the utmost importance and its 'protection must be maintained as far as can be seen ahead'<sup>6</sup>. PPG2 states that Green Belts should only be altered in exceptional circumstances and Local Plans should not alter Green Belt boundaries unless required to do so by their associated Structure Plan. However, some developments may be allowed within the Green Belt provided they are for the following purposes<sup>7</sup>:

- I. agriculture and forestry;
- II. essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it;
- III. limited extension, alteration or replacement of existing dwellings;
- IV. limited infilling in existing villages, and limited affordable housing for local community needs under development plan policies according with PPG3; or
- V. limited infilling or redevelopment of major existing developed sites identified in adopted local plans.

#### **3.2 Regional Policy**

3.2.1 The Draft South-West Regional Spatial Strategy (RSS) was published in June 2006 and is expected to be adopted in 2008. The RSS supersedes Regional Planning Guidance (RPG) 10, completed in 2001. After a number of consultations it was concluded that the principles of the RPG were still relevant, but the developing RSS would need to be more positive, explicit and prescriptive with respect to matters requiring a strategic approach. Additionally, the data used to prepare the Draft RSS suggests a demand for development far in excess of that proposed by RPG 10.

3.2.2 Two policies – Policy SR11 and Policy SR13 – relate to the Green Belt and affects the Cheltenham Green Belt. They state:

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<sup>5</sup> Planning documents not included in this analysis include: DOE Circular 14/84; MHLG Circular 42/55; Current Planning Policies, Cheltenham Borough Council, 1978; and Cheltenham Conservation Areas Statement of Policy, Gloucestershire County Council in collaboration with Cheltenham Borough Council, 1973.

<sup>6</sup> Planning Policy Guideline 2: Green Belt. Paragraph 2.1.

<sup>7</sup> Planning Policy Guideline 2: Green Belt. Paragraph 3.4.

**Policy SR11:**

“Around the built-up areas of Gloucester and Cheltenham, the inner boundary of the Green Belt shall generally follow the limits of existing development or that already committed. The general extent of the Gloucester and Cheltenham Green Belt is maintained subject to changes in boundaries that will be defined in Local Development Documents to:

- Accommodate the urban extensions required for the longer-term development of Gloucester and Cheltenham at locations identified in Policies SR12 and SR13, with the revised inner boundary co-terminous with the outer edge of the urban extension;
- Include land to the north and north west of Bishop’s Cleeve, whilst recognising development plan commitments; with the inner boundary of the revised Green Belt co-terminous with the outer boundary of the Green Belt designation; and
- Include land to the south and south west of Gloucester, whilst recognising development plan commitments”.

**Policy SR13:**

“Cheltenham will continue to realise economic opportunities, whilst protecting and enhancing the environment, with provision for job growth in the Cheltenham TTWA made for about 10,750 jobs over the plan period. Provision should be made for an average of about 625 dwellings per annum within the adjoining Cheltenham’s urban area over the plan period.

Development at Cheltenham will focus on the regeneration of the existing urban area through initiatives such as ‘Cheltenham Civic Pride’ and the creation of an Urban Design Framework, re-using previously developed land and buildings within the urban area, maximising densities whilst seeking high quality design standards. A strategic urban extension will be provided to the north/north west of Cheltenham for about 4,000 dwellings (Area of Search I) as shown on the Inset Diagram. Development of housing should be phased to compliment the regeneration of the central area. Investment will be made in key infrastructure to enable the achievement of the development proposed in this policy”.

- 3.2.3 Policy SR11 re-iterates the importance of the Green Belt around Cheltenham and to the north. However the Borough will need to find land for almost 11,000 new jobs and 625 houses per year over the plan period consistent with the reviewed Green Belt.

**3.3 Sub-Regional Policy**

- 3.3.1 The first Cheltenham Green Belt, established in 1968<sup>8</sup>, comprises all of the land between the towns of Cheltenham and Gloucester City. Its stated purpose was to restrict development and preserve the open character of the land. While the County Development Plan did not specify in detail the eastern boundary adjacent to Cheltenham, it included a map showing the area. It describes the Cheltenham Green Belt boundary as follows (described anti-clockwise from the north-west of Cheltenham):

<sup>8</sup> County of Gloucestershire Development Plan. First Quinquennial Review. Written Statement. 13 November 1968. Section 14.

*“lands south of Tewkesbury Road to the west of Bar Bridge, crossing the A40 to include most of The Reddings, crossing the rail road line and moving easterly to border Hatherley, crossing Shurdington Road to border border the southern boundary of Leckhampton, ending at Leckhampton Road”.*

- 3.3.2 The main object of the Green Belt was to keep the separation between Cheltenham and Gloucester.

### ***The Structure Plan for Gloucestershire, 1982***

- 3.3.3 The Gloucestershire County’s first Structure Plan became operative on 21 October 1981 and influenced development for the entire administrative County<sup>9</sup> up to 1996. This Plan re-affirmed the existing Green Belt land and expanded the designation to lands north of Cheltenham to protect the gap between Cheltenham and Bishop’s Cleeve (Policy L.6). Paragraph 13.55 allowed Local Plans to review the detail of the boundaries to accommodate local changes that may be required, e.g. to reflect major highway proposals. Policy CM 3 directs the Councils to promote measures to secure co-ordinated countryside management around the urban fringes of Gloucester and Cheltenham, including Green Belt areas. The Secretary of State approved this Plan, thereby confirming that the Green Belt policies met National objectives.

- 3.3.4 General Policy L6 states:

“A Green Belt will be defined between Gloucester and Cheltenham and north of Cheltenham. Within the Green Belt development will only be permitted where it is essential to meet the needs of agriculture, forestry, open air recreation, cemeteries, institutions standing in large grounds, or other uses appropriate to a rural area. Development in villages within the Green Belt will normally be permitted on infill sites only.

#### *Explanation*

The original Green Belt was designated to preserve the open character of the land between Gloucester and Cheltenham and to prevent the merging of the two towns. This principle is reaffirmed by the Policy. However, it is over ten years since this designation was approved and it is recognised that local circumstances may have changed, for example, by major highway proposals. It is therefore considered appropriate that the detail of the boundaries should be reviewed when Local Plans are prepared.

The purpose of defining this Green Belt is therefore to impose limits on urban sprawl and uses in the countryside, to prevent the merging of Gloucester and Cheltenham and to retain the open character of the adjacent countryside. In addition the definition of Green Belt areas will confirm a long-term agricultural future by reducing uncertainty and providing security for agricultural investment. Particular attention will be paid to the retention of economically viable agricultural holdings. It is intended that these protective measures will be supplemented with positive countryside management policies”.

<sup>9</sup> Including District Council administrative areas of Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud and Tewksbury.

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- 3.3.5 The Policy re-iterates Green Belt protection but allows Local Plans to review Green Belt boundaries.

***Gloucestershire Structure Plan, Second Review, 1999***

- 3.3.6 The Structure Plan Second Review was adopted in November 1999 and maintained the existing Green Belt lands between Cheltenham and Gloucester and north of Cheltenham with no extensions. Green Belt policies include:

Policy GB1 states:

“The Green Belt between Gloucester and Cheltenham and north of Cheltenham will be maintained. Within the Green Belt only appropriate development which would not compromise the open character of the Green Belt or which would not contribute to the coalescence of settlements will be permitted.

*Explanation*

In preparing local plans, alternations to the Green Belt will only be permissible upon the demonstration of the existence of ‘exceptional circumstances’ in accordance with PPG2. The consideration of exceptional circumstances will involve detailed assessment of the capacity of urban areas as well as a comparative assessment of alternative locations outside the Green Belt in terms of various sustainable criteria. It is not envisaged significant alteration to accommodate development needs for this Plan period will be required.

A review of the extent of the Green Belt boundaries to investigate the possibility for releasing land as a means of accommodating future development needs which cannot be met elsewhere in sustainable locations is likely to be required during the review of subsequent Structure Plans. Any such land release should be well related to both Gloucester and Cheltenham and should not result in the coalescence of settlements. Development is likely to be in the form of a new settlement or urban extension(s) to meet long term development needs. It should be noted that any review of Green Belt would need to consider scope to include additional areas.

Opportunities to fulfil the positive objectives for land use in the Green Belt are set out in PPG2 and will be supported by the County Council. Examples would include land management initiatives, which will secure improved accessibility and amenity for people living in Gloucester and Cheltenham, and also those projects which will improve and protect the biodiversity of the area. The importance of maintaining open space around the urban areas for recreation, tranquillity and wildlife habitats is also recognised”.

- 3.3.7 Policy GB1 does make some allowances for potential development within Green Belts provided the separation between Cheltenham and Gloucester and Cheltenham and Bishop’s Cleeve afforded by the Green Belt is not compromised.

***Gloucestershire Structure Plan, Third Alteration***

- 3.3.8 Gloucestershire County Council and the Secretary of State could not agree on issues within the Third Alteration of the Structure Plan and therefore the policies adopted in 1999 are still in force today.

- 3.3.9 The Policy extended the Green Belt north of Cheltenham to ensure the separation of Cheltenham and Bishop's Cleeve. It notes that a review of Green Belt boundaries will be required in future Structure Plans to investigate how accommodating sustainable development may affect Green Belt boundaries.

### 3.4 Cheltenham Local Plans

#### ***Cheltenham Environs and Cheltenham Borough Local Plans, 1985***

- 3.4.1 The first Cheltenham Local Plan to incorporate Green Belt policies was in fact, the following two Plans to be run in conjunction with each other:
- I. Cheltenham Environs Local Plan. Written Statement. Tewkesbury Borough Council, December 1985; and
  - II. Cheltenham Borough Local Plan – Written Statement, prepared by the Cheltenham Borough Council, December 1985.
- 3.4.2 Both Plans were effective until 1996. The Cheltenham Borough Local Plan contains the policies for development within the Borough of Cheltenham, whilst the Cheltenham Environs Local Plan included all Parishes within the Cheltenham Policy Area<sup>10</sup>, except Cheltenham Borough.
- 3.4.3 These plans implemented the Structure Plan's extension of the Green Belt to include land between Cheltenham and Bishop's Cleeve (north)<sup>11</sup>. However, the former plan altered the Green Belt boundary in the Up Hatherley/Leckhampton areas to accommodate housing development<sup>12</sup>.
- 3.4.4 The policies within the Cheltenham Environs Local Plan which relate to the Green Belt include the following:

“The Proposals Map defines that part of the Cheltenham Environs Local Plan area to which Green Belt policies will apply. In confirming a final, extended Green Belt boundary, the Borough Council has sought to minimise changes to the present alignment, consistent with the need to provide adequate areas of land for anticipated future housing and employment growth within the Plan Area as required by the strategy of the County Structure Plan. Modifications have, of necessity, been made in certain locations, details of which are given in Table 9”.

Policy ENV. 5A states:

“An area of Green Belt is defined on the proposals map to form part of a statutory Green Belt between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve. Within the Green Belt, development will normally only be permitted where it is essential to meet the needs of agriculture, forestry, open air recreation, cemeteries, institutions standing in large grounds, or other appropriate to a rural

<sup>10</sup> Badgeworth, Boddington, Bishop's Cleeve, Coberley, Cowely, Great Witcombe, Leckhampton, Prestbury, Shurdington, Southam, Staverton (to east of M5), Swindon, Uckington, Up Hatherley, and Woodmancote.

<sup>11</sup> The Structure Plan for Gloucestershire. March 1982. Policy L.6. adopted by Cheltenham Environs Plan (1985), Policy ENV.5 and Cheltenham Borough Plan (1985) Policy 94.

<sup>12</sup> Cheltenham Environs Local Plan. Written Statement. Tewkesbury Borough Council. December 1985. Policies H.2 and H.4.

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area. Development in villages within the Green Belt will normally be permitted on infill sites only”.

Policy ENV. 5 states:

“Areas of unallocated land at Leckhampton, Uckington and Bishop’s Cleeve are defined on the proposals map as lying between these built up areas and the boundary of the statutory Green Belt.

Within these areas, development will normally only be permitted where it is essential to meet the needs of agriculture, forestry, open air recreation, cemeteries, institutions standing in large grounds, or other appropriate to a rural area”.

Policy R.1 states:

“The Borough Council will, in conjunction with the Country Council and the Countryside Commission, encourage the provision of facilities which improve public access to the countryside, but will seek to protect areas from excessive use. Priority in this respect will be given to providing public access to the countryside in the urban fringes and the Green Belt”.

3.4.5 The policies within the Cheltenham Borough Local Plan which relate to the Green Belt include the following:

Policy 90 states:

“The replacement of existing houses in the countryside and the conversion to residential use of barns or other agricultural buildings where of architectural or historic interest and no longer capable for use for their original purpose will normally be permitted. Buildings and replacement of existing dwellings within the Cheltenham-Gloucester Green Belt or Cotswolds AONB will normally be permitted subject to the original volume of the building not being exceeded by more than 10% or 50 cubic metres (whichever is the greater) and subject to strict control on design, environmental impact and further extension”.

#### *Explanation*

“The concept of ‘Green Belt’, as a means of checking the unrestricted sprawl of built-up areas and protecting the countryside, dates from 1955, when the then Minister of Housing and Local Government published Circular 42/55 recommending local planning authorities to consider establishing areas of Green Belt. In Gloucestershire, a Green Belt between the two principal towns of Gloucester and Cheltenham was first put forward in 1957 and later formally approved as part of the County Development Plan. A Quinquennial Review was undertaken in 1968, with the following objectives:

- (a) to avoid the erosion of the landscape by preventing urban sprawl, sporadic, undesirable and inappropriate development and uses;
- (b) to protect and improve the open character of the countryside between Cheltenham and Gloucester, and to secure a high standard of visual amenity in the landscape of this area;
- (c) to preserve the special character of the individual towns by preventing their coalescence; and



- (d) to confirm a long term agricultural future by reducing uncertainty, thus providing security for agricultural investment.

The Structure Plan re-affirmed the principal of the Green Belt (Policy L.6) but also recognised that its current boundaries, which were defined more than ten years ago, would need to be reviewed to take account of changes in local circumstances since designation. The Structure Plan proposed an extension of the Green Belt to the north of Cheltenham to prevent its coalescence with Bishop's Cleeve.

In Cheltenham Borough, the Green Belt boundary now closely relates to existing or proposed development. Since Structure Plan housing and employment requirements for borough and the Urban Area can be met elsewhere, no general changes to the boundary are proposed".

Policy 94 states:

"A Green Belt is defined in the west of the borough to form part of a statutory Green Belt between Cheltenham and Gloucester, and between Cheltenham and Bishop's Cleeve".

Policy 95 states:

"New residential, commercial or industrial development will not normally be permitted in the Green Belt. Applications for changes of use will be considered on their merits".

- 3.4.6 The Cheltenham Environs Local Plan (for the area at that time within Tewksbury Borough) and the Cheltenham Borough Local Plan together established the Cheltenham Green Belt boundaries. Both included strict controls on any new development within the Green Belt.

### ***Cheltenham Borough Local Plan, 1997***

- 3.4.7 The second Cheltenham Local Plan came into force in 1997.
- 3.4.8 The policies relating to Green Belt include the following:

#### *Explanation*

"Residential development already stretches into the Green Belt along certain roads. The Cheltenham Environs Local Plan contained a policy allowing limited infilling on existing road frontages of The Reddings. In accordance with PPG2, the Council considers that this special local circumstance should also apply in Shaw Green Land and Bowbridge Lane, subject to careful qualification. Such infilling will only be permitted where it does not detract from the character or objectives of the Green Belt.

Policy CO 49 (CO 5):

Within the Green Belt, there will be a presumption against the construction of new buildings for the purposes other than:

- (a) agricultural and forestry (see Note 1); or
- (b) essential facilities for outdoor sport and outdoor recreation, for cemeteries, or for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it; or

- (c) limited rebuilding, replacement, or extension of existing dwellings, subject to Policies CO 50 and CO 51; or
- (d) limited infilling in accordance with Policy HS 73 within build up frontages along The Reddings, Shaw Green Lane and Bowbridge Lane, if there is no adverse impact on the openness of the Green Belt.

Engineering or other operations or any material change of use will not be permitted unless they maintain the openness of the Green Belt and do not conflict with the purposes of including land in it.

Note 1: unless permitted development rights have been withdrawn (see policy CO 56)".

Policy CO 50 (CO 6A):

"The Borough Council will only permit the rebuilding or replacement of existing dwellings in the Green Belt where:

- (a) the volume of the original building is not exceeded by more than 15% or 70 cubic metres (whichever is the greater); and
- (b) the siting, design, environmental impact and landscaping are consistent with the maintaining the openness of the Green Belt".

Policy CO 51 (CO 6B):

"The Borough Council will only permit the extension of an existing dwelling in the Green Belt where it:

- (a) is clearly subordinate in size and consistent in character with the original building; and
- (b) does not detract from the openness of the Green Belt".

Policy CO 52 (CO 7):

"The Borough Council will not permit the development of unallocated open land at Leckhampton, except for those classes of development that would be acceptable in the Green Belt".

- 3.4.9 While most boundaries remain the same, there were changes at The Reddings and Arle Court areas, where the Green Belt boundary now follows the line of the proposed South-West Distributor Road to allow for residential and retail development<sup>13</sup>. Additionally, there was space set aside in Swindon North-West Bypass Corridor opportunity<sup>14</sup>.

### ***Cheltenham Borough Local Plan, Second Review, 2006***

- 3.4.10 The 2006 Local Plan Review made certain changes to the Green Belt boundaries. It included Cheltenham Racecourse within the Green Belt but the Racecourse was the subject of specific Non Green Belt policies.

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<sup>13</sup> Cheltenham Borough Council. Cheltenham Borough Local Plan. Adopted December 1997. Paragraphs 6.34 and 6.35, and Policy CO 48 (CO 4).

<sup>14</sup> Cheltenham Borough Council. Cheltenham Borough Local Plan. Adopted December 1997. Policy TP124. This is consistent with Structure Plan for Gloucestershire (1982) Paragraph 13.55.

3.4.11 An assessment of Local Plan Green Belt policies is included in Section 4.9 of this Report.

### **3.5 Conclusions**

3.5.1 The following conclusions can be drawn from policy analysis:

- The Cheltenham Green Belt has been designated in accordance with Government, Regional and County Development Plan policies;
- The protection of land between Cheltenham and Bishop's Cleeve is now an integral part of the Cheltenham Green Belt.
- Minor changes have been made to the Green Belt boundaries over the last twenty years without the benefit of a comprehensive review to the Green Belt having been completed;
- The Green Belt policies have become more restrictive regarding development allowed within the Green Belt; and
- The Cheltenham Racecourse is now located within the Green Belt but is subject to certain Non Green Belt policies.

3.5.2 The present Review has been undertaken in order to provide a context for changes to the Green Belt in the future.

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## 4. GREEN BELT ROLE AND PURPOSES

### 4.1 Introduction

- 4.1.1 When a Green Belt is established, its permanence is of the utmost importance and 'their protection must be maintained as far as can be seen ahead'<sup>15</sup>. PPG2 states that Green Belts should only be altered in exceptional circumstances and Local Plans should not alter Green Belt Boundaries unless required to do so by their associated Structure Plan or RSS, (which was required by PPG10 and is now part of the development plan).
- 4.1.2 Section 2 of this report noted the Draft Regional Spatial Strategy's proposal to readdress Green Belt boundaries to accommodate future development. So, whilst the permanence of Green Belts is the ultimate National objective, redefining Green Belt boundaries may be required in order to provide for future sustainable development.
- 4.1.3 For this reason, Cheltenham Borough Council has commissioned a robust, transparent analysis of Cheltenham's Green Belt. This section of the report sets out the findings of that part of the Study that considered the extent to which the areas of Green Belt fulfil Green Belt purposes. Additionally, areas which are currently not included within the Green Belt designation have been included in the analysis to determine the extent to which they would fulfil Green Belt purposes if included in the Green Belt.
- 4.1.4 This section also describes the methodology used to evaluate the effectiveness Cheltenham's Green Belt land in fulfilling the purpose of PPG2. It restates the purposes identified in National Guidance and discusses the perceived importance these purposes hold to Cheltenham, and concludes with a review of Cheltenham's Green Belt policies.

### 4.2 Objectives and Roles of Cheltenham Green Belt

- 4.2.1 The Cheltenham Green Belt was first established in 1968 (see Section 3.3 of this report for more details) to preserve the open character of the land between Cheltenham and Gloucester, preventing the separate communities from merging with each other.
- 4.2.2 The present Cheltenham Green Belt includes the extension, adopted in 1981, see Section 3.3 for more details) to the original Green Belt to the north of Cheltenham in order to prevent Cheltenham merging with Bishop's Cleeve to the north.
- 4.2.3 The primary role of the Cheltenham Green Belt, as identified by policies included in Section 3.3, is therefore:
- I) To avoid the erosion of the landscape by preventing urban sprawl, sporadic, undesirable and inappropriate development and uses;
  - II) To protect and improve the open character of the countryside between Cheltenham and Gloucester and later Bishop's Cleeve, and to secure a high standard of visual amenity in the landscape of this area;

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<sup>15</sup> Planning Policy Guidance Note 2: Green Belt. Paragraph 2.1.

- III) To preserve the special character of the individual towns by preventing their coalescence; and
- IV) To confirm a long-term agricultural future by reducing uncertainty, thus providing security for agricultural investment.

4.2.4 This Green Belt Study involved a number of consultation exercises to ensure the public opportunity to voice their views on issues involving the Green Belt. These exercises included stakeholder events (see Section 7 for more details). The attending consultees suggested additional roles that the Cheltenham Green Belt performs or could perform including:

- economic regeneration of the town;
- encouraging redevelopment of key sites;
- increased economic benefits from tourism;
- benefit local agriculture;
- landscape improvements;
- increased biodiversity;
- reduced pollution;
- improved access to the Countryside;
- provide “gateways” to Cheltenham;
- improve the setting of the town; and
- access for recreation as part of sustainable development.

### 4.3 Methodology for Area Definition

- 4.3.1 The Detailed Study area for this project was defined to be the existing Green Belt within Cheltenham Borough Boundary and adjacent areas within Cheltenham between the Green Belt and the built-up area. This included parts of the Area of Outstanding Natural Beauty (AONB) land, designated unallocated land, and pockets of green space within Cheltenham that have at least one continuous open boundary with the Green Belt.
- 4.3.2 AONB land adjacent to Cheltenham’s eastern boundary is extensive and robustly protected from development by national policy. The Study Area (see Figure A) only included parts of this land that might be able to serve as a compensatory addition to Cheltenham’s Green Belt in the future. These two areas shown on the Study Area Plan about the Green Belt to the north east and south east of the town, and were tested against Green Belt purposes to determine whether more extensive parts of the Areas of Outstanding Natural Beauty should be included in the detailed Study Area.
- 4.3.3 A wider study area (see Figure A) was also defined in consultation with the neighbouring local authorities, across which the wider implications of the study would be considered.
- 4.3.4 Zones (shown as A, B, C, D, E, F and G) were identified which were used for the sub regional study (see Figure B). These zones are consistent with those previously identified in the Gloucester/Cheltenham Green Belt Study reports (see Section 2.4 for more detail of this study) to allow the Council consistency when evaluating future land use.
- 4.3.5 The zones within the Study Area were defined and all the Ordnance Survey (OS) parcels for each zone were plotted through use of the OS maps working from the north–western boundary of the Study Area in a clockwise direction. This resulted in excess of 900 individual OS parcels being identified.

- 4.3.6 These OS parcels were assessed to consider how best they could be combined to create sub areas in order to smooth the progress of the review whilst ensuring the precision needed. The criteria for establishing the sub areas included the following:
- OS parcels were not split and major development curtilages were included as a separate sub areas;
  - the sub areas should be of similar character and land use for Green Belt purposes;
  - sub areas should not cross Zone boundaries;
  - sub areas should not cross motorways, main A classified roads, B roads and C roads or railway lines;
  - no woodland or main areas of trees should be split between sub areas;
  - sub areas should not cross main rivers, streams or flood land;
  - sub areas should where possible not cross strong hedgerows denoting field boundaries;
  - existing housing and urban developments should not be separated by sub areas;
  - sub areas should take account of changing landscape and landform;
  - sub areas should be smaller in area where they are located close to existing development; and
  - typically each sub area should where possible be no smaller than 4 hectares (10 acres) in extent and total 78 in number.
- 4.3.7 OS maps, the Local Plan and aerial photographs were used to combine the OS parcels to establish the sub areas. Each sub area was assigned a unique identifier consisting of the letter, identifying the zone for which the sub area was contained, and a number.
- 4.3.8 The sub areas adjacent to existing urban areas were viewed on site together with other sub areas chosen at random to check that they were of suitable size, consistent character and had not been affected by development, since the maps and aerial photographs from which their boundaries were drawn had been prepared. The resulting sub areas are shown in Figure B.

#### **4.4 Criteria for Purpose Analysis**

- 4.4.2 It was necessary to analyse each Green Belt purpose, as stated in Planning Policy Guidance 2 (and identified in Section 2.2) to establish a sound definition and then create a complementary scoring system so that each sub area in Cheltenham's Green Belt could be evaluated consistently. The study investigated Planning Policy Guidance Note 2, all additional relevant Planning Policy Guidance/Statements, and existing Green Belt review documents to define each Green Belt purpose. Professional experience of Green Belt boundary definition in Local Plans was used to apply this guidance to establish definitions, which are expressed as 'criteria' for the purposes of this report.
- 4.4.3 These criteria used to define the five Green Belt purposes are identified below and further explained in terms of how they were used in the analysis in Appendix A4.2:

*Purpose 1. Check unrestricted sprawl of large built up areas:*

The principal criteria for this purpose of restricting urban sprawl are – whether the area assists in halting ribbon development<sup>16</sup>; and the location of the area in terms of distance from the built-up area.

*Purpose II. Prevent neighbouring towns from merging:*

The criterion used to assess how each sub area fulfils this ‘purpose’ was the role it played in separating settlements in terms of the distance of its outer boundary from the nearest neighbouring urban area.

*Purpose III. Assist in safeguarding the countryside from encroachment:*

Defining this ‘purpose’ proved difficult because the numerous roles the countryside performs in contributing to the Green Belt. The study defined four criteria based on the extent to which the nature and character of the area of land contributes to the countryside. These criteria are nature conservation value, landscape character, the presence of trees/hedgerows, and agricultural land quality.

*Purpose IV. Preserve setting and special character of historic towns:*

The criteria used for this purpose comprise visual links to Cheltenham’s Town Centre, and the area contributes to a “gateway<sup>17</sup>” into Cheltenham, and the relationship of the area to Conservation Areas.

*Purpose V. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land:*

As every plot of land in a Green Belt contributes equally to fulfilling this ‘purpose’ by encouraging development within the urban area to an equal extent, all sub areas would score the same against this purpose, so it was excluded from the scoring process (confirmed by Stakeholder workshops – see section 7.3).

## 4.5 Scoring Methodology

- 4.5.1 Once the criteria were defined it was necessary to establish a clear scoring system with points to allow an easy and transparent means of assessing the contribution each sub area makes to fulfilling each Green Belt purpose (as defined by Planning Policy Guidance Note 2). Therefore the criteria were further defined to describe the degree to which the sub area meets a specific criteria and points awarded accordingly. The points ranged from 0 to 5, with 0 given to those areas not contributing at all to meeting the purpose and 5 to those sub areas fulfilling to a greatest extent, the Green Belt purpose. The criteria, criteria definition and associated points available are shown in Appendix A4.2.
- 4.5.2 Some of the four purposes have more definable criteria, thus may have a higher total score than others. For example, purpose II, preventing neighbouring towns from merging, has only one criterion, therefore can only receive a maximum of 5 points;

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<sup>16</sup> “Ribbon development” is the spread of built development in ribbon form along roads typically radiating from a town.

<sup>17</sup> The word “gateway” is used for this study to describe a main entrance as a corridor into Cheltenham by road or rail. The importance of these “gateways” was confirmed by the Stakeholder workshops (Section 7.3).

while purpose III, assisting in safeguarding the countryside from encroachment, has four criteria and the sub areas could receive a maximum of 20 points if it fulfils purpose II to the greatest extent. Left alone, this would imply that fulfilling purpose III was more important than fulfilling others.

- 4.5.3 To rectify this, a weighting system was applied to ensure that each ‘purpose’ holds equal importance for the purposes of the initial scoring exercise. This is explained in Appendix A4.2, and all the total resulting scores are shown in tabular form in Appendix A4.3.

#### 4.6 Results of Scoring

- 4.6.1 The initial results of the basic scoring exercise are identified in Appendix A4.4 but take no account of the relative importance of Green Belt purposes to Cheltenham. The original and currently perceived (as confirmed by the stakeholders consultation) most important reason for the Green Belt was to prevent the merging of settlements (see Sections 3.3 and 4.2). Consequently a ranking system (described in Section 4.7) was introduced to correct this.

#### 4.7 Ranking against Purposes

- 4.7.1 Section 3 describes the primary reason for establishing a Green Belt around Cheltenham was to prevent Cheltenham and Gloucester, and later Cheltenham and Bishop’s Cleeve, from merging. Reviews of Cheltenham’s Local Plans and feedback from recent consultation workshops (see Section 7 for more details) have confirmed the importance that this purpose plays in the Cheltenham Green Belt. Additionally, these activities have identified the overall relative importance of Green Belt as being in the order identified below.
- 4.7.2 This order of importance, or ‘ranking’, was used in the final scoring stage and once the total score for each purpose was calculated and weighted, it was then multiplied by the ‘ranking multiplier’ to reflect its importance (those purposes holding more importance had a higher ranking multiplier). The ranking (in terms of the relative importance of the purpose) was confirmed by the Stakeholder workshops. The higher the ranking, the higher the multiplier applied to the scores. Figure C shows the results of the ranked sub area scoring exercise (see Appendix A4.4 for a Table of results).

Rank (in order of importance)	Purpose	Ranking Multiplier
1	II. Prevent neighbouring towns from merging	4
2	I. Check unrestricted sprawl	3
3	III. Assist in safeguarding the countryside from encroachment	2
4	IV. Preserve setting and special character of historic towns	1

- 4.7.3 Once the total weighted and ranked scores were calculated it was apparent that a system of identifying how each sub area scored compared to other sub areas was needed. Therefore, three categories were established – High, Average, and Low and the range of scores for each of the categories identified by the following process:



1. The first step was to determine the total point spread of the final, weighted results. This was calculated by subtracting the lowest sub area score, which was 68, by the highest sub area score, which was 202. The total point spread is 134 ( $202 - 68 = 134$ ).
  2. The next step involved taking the total point spread (134) and dividing it by three (dividing it by three is because there are three categories; if there were four categories, it would divide it by four). The result was 45 ( $134 \div 3 = 44.67$ ; using the rules of rounding, these numbers were rounded up to the nearest whole number; 45).
  3. Therefore since the High, Average, and Low categories will each have a range of 45 points, the total score range each category can be established as follows:
    - a. 'High' category: will include those sub areas scoring between 157 and 202 ( $202 - 45 = 157$ ).
    - b. 'Average' category: will include those sub areas scoring between 111 and 156 ( $156 - 45 = 111$ ).
    - c. 'Low' category will be for those sub areas scoring between 65 and 110 ( $110 - 45 = 65$ ).
- 4.7.4 The resulting high, average and low scoring sub areas are shown in Appendix A4.5 and Figure C.

## 4.8 Findings

- 4.8.1 The findings derived from this element of the study demonstrate the importance of reflecting the relative importance of each Green Belt purpose through a ranking system. Zone A, the area between Cheltenham and Bishop's Cleeve, did not score high when all purposes were equalised, but once the ranking was applied the importance of this area to the Green Belt was demonstrated. Appendix A4.6 identifies the scores that each sub area received for each criterion as well as the unranked, weighted and ranked total scores. The results for each areas are summarised as follows:

### Swindon Village

- The sub areas to the west and north-west (including sub areas G4, 6 and 7) scored 'Low' because they do not play a role fulfilling the purpose II, preventing neighbouring towns from merging. As this is the perceived most important Green Belt purpose, a low score on this significantly reduced these sub areas overall score. Additionally, the results of the analysis show these sub areas do little in assisting in safeguarding the countryside from encroachment (purpose III).
- The sub area immediately adjacent in the northern and east edge of the village (including sub areas G5, G3, G11, G10 and G11) received higher scores than the area to the west and north-west as the analysis shows that these sub areas contributed more towards purpose II and purpose IV, (preserving the setting and special character of historic towns).

### Prestbury Village

- The sub areas including Prestbury Village and adjacent sub areas (including A11, A6, A3, A8 and A9) received a mix of low and average scores. These sub areas scored relatively high in fulfilling purpose I, (check unrestricted sprawl of large built-up areas) but low for purposes II and III.

### Area between Cheltenham and Bishop's Cleeve

- The majority of the sub areas (including A4, A7, A10, G14, G19, G13, G12, G15, G18) that fall within this area received high scores and they make significant contributions towards purpose II, (prevent neighbouring towns from merging).

### Leckhampton AONB Land (Sub areas D4 to D21)

- Zone D consists almost entirely of Area of Outstanding Natural Beauty within the Cheltenham Borough boundary. Whilst this area has high landscape value linking the town with Leckhampton Hill, once the scores were weighted and ranked nearly two thirds of the 22 sub areas within this zone received 'low' scores (scores ranging from 85 to 110) and the remaining scored 'average' (scores ranging from 120 to 150). This is because the ranking placed greatest importance on Purpose II - preventing neighbouring towns from merging – and these three sub areas do not fulfil this purpose and as a result, are awarded the lowest points.

### Leckhampton Unallocated Land (sub areas D1, D2, and D3)

- Three sub areas D1, D2, and D3 make up the Leckhampton Unallocated Land. The results for this area are consistent with the remaining Leckhampton land as it shows that once the scores were weighted and ranked sub areas D1 and D3 scored 'average' (both with 150 points) whilst sub area D2 scored 'low' (110 points). This is because the ranking placed greatest importance on Purpose II - preventing neighbouring towns from merging - as all three sub areas do not fulfil this purpose and as a result, are awarded the lowest points. The difference in scores between D1 and D3 and D2 is that D2 does not include as many houses, thus does not contribute as much as the other two in impeding ribbon development.

4.8.2 A further important conclusion is that all Green Belt sub areas contribute to the achievement of Green Belt purposes, with the lowest score of all sub areas being 68 compared with a theoretical minimum score of 45.

4.8.3 Furthermore only one of the sub areas covered by the Study, but not already within the Green Belt, achieved a high score – sub area G3 to the south–east of Swindon Village.

## 4.9 Local Plan Green Belt Policies

4.9.1 The existing Cheltenham Local Plan Green Belt (2006) policies were assessed to consider whether they could be included within the emerging Local Development Framework (LDF) in their existing form or needed to be updated, amended or otherwise altered.

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- 4.9.2 The Local Plan was also assessed to consider whether there were any policies that do not at present relate to Green Belt which might contribute positively to the Green Belt and might therefore be included as Green Belt policies in the forthcoming LDF.
- 4.9.3 In order to undertake the assessment, the four existing Green Belt policies (these include CO48, CO49, CO51, and CO52 and are described in paragraph 4.10.8) were first assessed against criteria for achieving the five Green Belt purposes to judge whether they contributed positively to some or all of the purposes. Where they contributed to some or all of the purposes and did not conflict with any of the purposes they were considered likely to be acceptable for inclusion in the emerging Local Development Framework and continued to be 'fit for purpose'.
- 4.9.4 Secondly the Green Belt policies were assessed against the appropriate technical 'Tests of Soundness' which need to be achieved for the policies to be included within any emerging Local Development Framework. These include the following 'tests' which are required by Planning Policy Statement 12 (published in 2004) and which are required to be satisfied to ensure "soundness" of policies to be included in Local Development Framework:
- Conformity:
- The policy is consistent with national planning policy and in general conformity with the regional spatial strategy for the region.
- Coherence, consistency and effectiveness:
- The policies are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities where cross boundary issues are relevant;
  - The policies represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base; and
  - The policies are flexible to deal with changed circumstances.
- 4.9.5 Where the policy contributed positively to all or some of the purposes of the Green Belt and did not conflict with any and passed all the 'Tests of Soundness', it was concluded that it could be included in the emerging LDF without amendment. Where the policy did not contribute to any of the Green Belt purposes or did not pass all the tests, it was concluded that it was not 'fit for purpose' for inclusion within the LDF without changes being made.
- 4.9.6 The assessment identifies policies requiring amendment and comments on the 'fitness for purpose' of each of the Green Belt policies.
- 4.9.7 The assessment also considers which of any non Green Belt policies would contribute positively to achieving the purposes of the Green Belt, would pass the tests and could be considered for inclusion as a Green Belt policy within the LDF.
- 4.9.8 The existing Green Belt policies are as follows:
- "POLICY CO 48:  
*DEFINITION OF GREEN BELT.*  
The area of Green Belt is defined in the Proposals Map".
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**“POLICY CO 49:*****DEVELOPMENT IN THE GREEN BELT.***

Within the Green Belt, except in very special circumstances, there will be a presumption against the construction of new buildings for purposes other than:

- (a) agriculture and forestry (note 1); or
- (b) essential facilities for outdoor sport and outdoor recreation, for cemeteries, or for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it; or
- (c) limited rebuilding, replacement, or extension of existing dwellings, subject to policies CO50 and CO 51; or
- (d) limited residential infilling (note 3) in within existing and previously undeveloped gaps in built up frontages along The Reddings, Shaw Green Lane and Bowbridge Lane, if there is no adverse impact on the openness of the Green Belt (note 4).
- (e) development in accordance with policy TO 113 (note 5).

Engineering or other operations or any material change of use will not be permitted unless they maintain the openness of the Green Belt and do not conflict with the purposes of including land in it.

- Note 1: Unless permitted development rights have been withdrawn - see also policy CO 56 (conversion of rural buildings).
- Note 2: See also policies RC 107 (recreation and sport in the countryside) and RC 108 (golf courses).
- Note 3: In this context, “infilling” means the construction of a new building or buildings between two existing buildings.
- Note 4: This precludes the demolition of existing housing and its replacement by a greater number of dwellings. Any replacement would be assessed in relation to policy CO 50 (rebuilding or replacement of dwellings in the Green Belt), with consequent restrictions on size and siting.
- Note 5: TO 113 (development at Cheltenham Racecourse).
- Note 6: Where planning permission is granted for the development of a building in the Green Belt, the Council may seek to impose a condition requiring removal of the building upon cessation of the original use”.

**“POLICY CO 50:*****REBUILDING OR REPLACEMENT OF DWELLINGS IN THE GREEN BELT.***

The rebuilding or replacement of existing dwellings in the Green Belt will only be permitted where:

- (a) the number of replacement dwellings is no greater than the number to be demolished; and
- (b) the volume of the original building is not exceeded by more than 15% or 70 cubic metres (whichever is the greater); and
- (c) there is no harm to the openness and visual amenity of, or encroachment upon, the Green Belt (note 3).

- Note 1: “Original” is as defined by the Town and Country Planning (General Permitted Development) Order 1995, and excludes subsequent extensions.
- Note 2: The change of use of dwellings in the Green Belt to other uses will be subject to policy CO 56 (conversion of rural buildings).

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Note 3: This may mean that development should be limited to the footprint of the original building”.

“POLICY CO 51:  
*EXTENSION OF DWELLINGS IN THE GREEN BELT.*

The extension of an existing dwelling in the Green Belt will only be permitted where it:

- (a) is clearly subordinate in size to and consistent in character with the original building; and
- (b) does not detract from the openness of the Green Belt.

Note “Original” is as defined by the Town and Country Planning (General Permitted Development) Order 1995, and excludes subsequent extensions”.

### ***Findings***

- 4.9.9 The assessment finds that three of the four Green Belt policies – policies CO48, CO50 and CO51 – contribute positively to the purposes of the Green Belt, do not conflict with any of the purposes and pass all the ‘Tests of Soundness’ required by Planning Policy Guidance 12. As such they are ‘fit for purpose’ for inclusion in the emerging Local Development Framework without changes being necessary.
- 4.9.10 With regards to Policy CO49, the main thrust of the policy contributes towards achieving Green Belt purposes and is ‘sound’. However the inclusion of (d) within the policy - allowing limited infilling at The Reddings, Shaw Green Lane and Bowbridge Lane in certain circumstances - would not contribute positively and would conflict with Green Belt purposes and could be considered ‘unsound’ since it lacks consistency with other parts of the Policy. In this respect encouraging infilling is not compatible with Green Belt purposes including preventing urban sprawl.
- 4.9.11 Deletion of (d) or detailed clarification of the areas to which it relates, which should be carefully restricted in extent, would ensure that the whole policy contributed to Green Belt purposes, was ‘sound’ and therefore ‘fit for purpose’ to be included within the emerging Local Development Framework.
- 4.9.12 Other non Green Belt policies within the Local Plan relating to land outside the principal urban area have also been assessed for their contribution to the purposes of the Green Belt. One policy – Policy TO113 relating to development at Cheltenham Racecourse – is particularly important to the Green Belt and to achieving the Green Belt purposes. The Racecourse occupies an important Green Belt site to the north of the town abutting the foot of Cleeve Hill. The Racecourse also combines two totally different elements that are fundamentally interlinked, the open areas of the course and the built area with very large structures including the stands. The special circumstances relating to the Racecourse mean that the policy could be included as a Green Belt policy.
- 4.9.13 The Policy TO113 states:
- “POLICY TO 113:  
*DEVELOPMENT AT CHELTENHAM RACE COURSE.*
- Development at Cheltenham Race course, including extensions, will only be permitted where it:
- (a) is principally horse racing related; and

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(b) does not extend beyond the confines of the built up area (note 1).

Note 1: The confines of the existing built up area is shown on Inset Map x.

Note 2: See also policies CO 49 (development in the Green Belt), CP 3 (sustainable environment) and CP 5 (sustainable transport).

- 4.9.14 The policy in its present state largely contributes positively to achieving the Green Belt purposes and is basically 'sound'. However for its inclusion as a Green Belt policy, there is need to restrict the use of the site as defined in the policy to **only** horse racing related activities and to define the area of the site within which such development would need to be confined to prevent a reduction in the openness of the Green Belt, to ensure that the Green Belt purposes are entirely served by the policy and to fully ensure 'soundness' as required by the Planning Policy Statements. The policy could then be included as a Green Belt policy within the emerging Local Development Framework.
- 4.9.15 One of the benefits of this approach is that it helps to demonstrate that the Racecourse is unique and that the planning factors which apply to the site do not apply elsewhere within Cheltenham's Green Belt.
- 4.9.16 The important contribution of the Racecourse to Cheltenham in terms of tourism and the economy of the town needs to be considered in relation to its sub regional role within the Green Belt. Recommendations on this point are not provided here as this would be outside the scope of the Project Brief. However this is an issue that the Borough Council should consider in developing the Local Development Framework.

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## 5. CONSTRAINTS AND OPPORTUNITIES

### 5.1 Introduction

- 5.1.1 The wider Green Belt around Cheltenham should reflect the need for the Borough and surrounding local planning authorities to accommodate new sustainable development now and in the future.
- 5.1.2 The extent of the Green Belt in the future therefore needs to take account of the ability of the land within and adjoining it to accommodate new patterns of sustainable development to assist in delivering sustainable communities. Such new patterns of development will need to accommodate fundamental constraints including avoiding flood risk areas. Planning Policy Statement 25, "Development and Flood Risk" advises that new development should avoid flood risk areas and this requirement may need cross boundary working to ensure that this takes place in the Wider Study Area.
- 5.1.3 Constraints to future sustainable development within the Study Area – either within the existing Green Belt in or adjacent areas – were assessed. These were categorised as either 'hard constraints' – fundamental constraints to development – or 'soft constraints' – those constraints which could be overcome. This established whether any parts of the existing Cheltenham Green Belt have the potential to accommodate sustainable development as part of a future review.
- 5.1.4 Strategic opportunities for accommodating major sustainable development in the future were assessed for areas within the Wider Study Area taking account of the Sub Regional Zones (see Figure B). The assessment provides an indication of how future Green Belt designation could accommodate new sustainable development as well as performing its present purposes.
- 5.1.5 The assessment of constraints to new development and opportunities for sustainable development could be used to inform consideration of any future changes to the boundaries of the Green Belt. Many other constraints may affect future development options and the assessment only takes account of those which could affect future Green Belt boundaries.

### 5.2 Constraints

- 5.2.1 Constraints to future development were considered to be either 'hard constraints' – those constraints which are considered to effectively preclude any development in the future – and 'soft constraints' – constraints which are considered could provide justification not to develop the land but which are not insurmountable.

#### ***Hard Constraints***

- 5.2.2 The assessment considered whether fundamental constraints to new development – 'hard constraints' – identified by the Strategic Green Belt Review undertaken for the South West Regional Assembly were relevant to the present review of the Study Area. The constraints identified by the present assessment includes two of the constraints - Flood Risk Areas and Area of Outstanding Natural Beauty (AONBs) – which were included in the Review. These constraints were considered to be equally applicable to the review of the Cheltenham Green Belt.

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- 5.2.3 Research of local planning policies and proposals resulted in another 'hard constraint' being used in the assessment - development exclusion zones around sewage and water reclamation works that were identified in the Cheltenham Borough Local Plan Second Review.

### **Soft Constraints**

- 5.2.4 Research of other Local Plan policies and proposals identified the following 'soft constraints' which might affect the location of new development:
- Sites of Special Scientific Interest;
  - Local Nature Conservation Area or Reserves;
  - Conservation Areas; and
  - Other Areas of Landscape Importance.

### **Findings**

- 5.2.5 Figure D shows in diagrammatic form the sub areas affected by these 'hard constraints'. The Area of Outstanding Natural Beauty affects sub areas to the east whilst the flood risk areas affect sub areas on the north and north-west of Cheltenham. The development exclusion zones affect areas to the north and west.
- 5.2.6 In terms of flood risk areas the Environment Agency are presently reviewing the 1:1,000 year flood risk data and the results of this review later in 2007 may inform the emerging Local Development Framework.
- 5.2.7 If the Development Exclusion Zone around the Fiddlers Green were to be reduced in area in consultation with other agencies and Tewkesbury Borough Council, it may enable future sustainable development to be planned in this area although this would require close co-operation between Cheltenham Borough Council and Tewkesbury Borough Council.
- 5.2.8 From the findings it can be seen that most of the lowest scoring sub areas are not affected by 'hard constraints' to any future development. However a number of the low scoring sub areas to the west of Cheltenham at Fiddlers Green were affected by the Development Exclusion Zone around the Hayden Water Reclamation Works located in Tewkesbury Borough Council's area, together with a key wildlife site.
- 5.2.9 Parts of sub areas to the north-west are within Flood Risk Areas, although the results of the Environment Agency review may alter the sub areas which are affected.
- 5.2.10 Additionally few of the lowest scoring sub areas are affected by 'soft constraints' to future development.

## **5.3 Sustainable Development Opportunities**

### **Sustainable Development Patterns**

- 5.3.1 Government has given local planning authorities the responsibility for ensuring that future new development should embody as far as possible the principles of sustainable development.
- 5.3.2 The creation of new sustainable patterns of development is now the aim for future development throughout the UK and including within Cheltenham. This is re-iterated



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by the Draft Regional Spatial Strategy for the South West which places creating high quality living and working environments as a major goal for the Region.

- 5.3.3 The benchmark for assessing sustainability and sustainable development in the UK is “Securing Our Future” (March 2005). It builds upon “A Better Quality of Life, A Strategy for Sustainable Development for the UK” published by the Government in 1991. The strategy was endorsed by Planning Policy Statement 1, “Delivering Sustainable Development”, published in February 2005, which emphasises the need for the planning process to deliver sustainable development.
- 5.3.4 The Strategy recognises that in achieving sustainable development, four inter-related and equally important objectives need to be fulfilled. These are:
- social progress which recognises the needs of everyone;
  - effective protection of the environment;
  - prudent use of natural resources; and
  - maintenance of high and stable levels of economic growth and employment;
- Achieving sustainable development is therefore about achieving a balance of these four objectives.
- 5.3.5 Future patterns of sustainable development in Cheltenham will need to embrace these four sustainability objectives in the context of local sustainability criteria. Achieving sustainable development is now at the heart of the local plan process and the emerging Local Development Framework will need to embrace sustainability in future development options.
- 5.3.6 Sustainability criteria were identified which covered the national sustainability objectives and which could provide a guide to future patterns of sustainable development. The objective of protecting the environment had previously been allowed for in considering constraints to new development in Cheltenham and the Wider Study Area.
- 5.3.7 In terms of ‘green’ transport, – the use of environmentally friendly modes of transport such as buses, – the criteria encompass those included within Planning Policy Guidance (PPG) 13, “Transport”, but have been amended to reflect the local circumstances of Cheltenham.
- 5.3.8 To decide whether areas within the Study Area were potentially a candidate for sustainable development in the future, the general areas were evaluated to see whether the identified criteria were satisfied now or likely to be satisfied in the future to establish potential general future patterns of sustainable growth.
- 5.3.9 Key to sustainability is accessibility – the relationship between places where people live and work. With this in mind ten sustainability criteria were chosen. These are not comprehensive – they provide a guide to possible future patterns of sustainable development in relation to the Green Belt. The assessment provided within the context of this report should be subject to additional and rigorous testing. This will be informed by the Council’s wider evidence base and the much wider picture by fuller assessment delivered by strategic environmental assessment and sustainability appraisal. Together the findings will inform the Local Development Framework process.
- 5.3.10 The criteria used for the identification of areas for major sustainable development in the future were the following:
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**Social Progress which recognises the needs of Everyone:**

- District Centre – within 1 kilometre of District Centre defined in the Local Plan;
- Secondary Schools – within 1 kilometre; and
- Leisure Centres, Major Parks and 'Green' Infrastructure – within 1 kilometre.

**'Green' Transport:**

- Operative Railway Line – within 800 metres;
- BR Station – within 1 kilometre;
- Operative 'Park and Ride' Site – within 1 kilometre; and
- Bus Corridor – within 800 metres.

**Prudent Use of Natural Resources:**

- 'Brownfield' Land – use of 'brownfield' site; and
- Motorway Junction – within 2 kilometres.

**Maintenance of High and Stable Levels of Economic Growth and Employment:**

- Major Employment Area – within 1 kilometre of an area employing more than 1,000 employees.

5.3.11 General locations which scored against one or two sustainability criteria, were considered as a potentially sustainable location for development. Additionally general locations which scored against more than two criteria, were also identified. As set out above, this analysis should not be considered in isolation and further rigorous testing will be required to identify options for development within the Local Development Framework.

***RSS Sub-Regional Study Findings***

5.3.12 The Draft Regional Spatial Strategy for the South West provides strategic policies for future sustainable development patterns for the Cheltenham and Gloucester Sub Region.

5.3.13 The sub regional strategy requires Cheltenham Borough, Tewkesbury Borough, Gloucester City and Gloucestershire County Councils to plan for the different characteristics and growth pressures at Cheltenham and Gloucester, maximising the use of previously-developed 'brownfield' land and buildings, and within a revised Green Belt make provision for urban extensions, for mixed-use development, to meet the longer-term needs.

5.3.14 Establishing sustainable patterns of future development will require continued co-operation, particularly at cross-boundary locations, through joint work on Local Development Frameworks addressing the distribution of financial contributions arising from Section 106 agreements and other funding mechanisms to deliver key infrastructure.

***Findings***

5.3.15 Figure E shows in diagrammatic form general areas within the Study Area and related to the Sub Regional Zones which satisfy certain sustainability criteria. The

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results provide guidance on potential future patterns of sustainable new development which would need to be the subject of much wider consideration and rigorous assessment by the emerging Local Development Framework.

- 5.3.16 A number of general locations to the west within Zone F satisfied up to two and more than two sustainability criteria although most of these locations were affected by 'hard' constraints.
- 5.3.17 Other general locations within Zones D at Leckhampton Farm (which satisfy more than two sustainability criteria), and Gloucester Road (up to two sustainability criteria) and Zone E at Up Hatherley which satisfy two sustainability criteria.
- 5.3.18 Some general locations in Zone G close to Swindon Village and the Racecourse and adjoining Prestbury Village within Zone A satisfy more than two sustainability criteria.
- 5.3.19 The sustainability potential of general areas within Zones A and D relate mainly to the proximity of 'green' space and 'green' travel including bus corridors. Areas in Zone F enjoy excellent access to 'green' infrastructure, an existing bus corridor and a District Centre.
- 5.3.20 General areas in Zone G which satisfy sustainability criteria have good accessibility to the railway line, bus corridors and 'green' infrastructure.
- 5.3.21 Accessibility to the main railway line could potentially encourage new sustainable patterns of development should additional station or parkway facilities be considered a viable proposition to serve any possible new "township" development.
- 5.3.22 The findings may suggest directions of sustainable development which inevitably impact on the adjoining authorities. Areas with cross-boundary sustainable development potential are shown diagrammatically.
- 5.3.23 Development westwards and north-westwards from the existing urban edge of Cheltenham may be sustainable if well designed and provided with the necessary infrastructure.
- 5.3.24 However this would inevitably affect adjoining land in Tewkesbury Borough. "Masterplanning" of such areas would require the two local authorities – to work closely together to achieve a sustainable pattern of new development.
- 5.3.25 The Green Belt will need in the future to accommodate improved access for recreation (a view endorsed by the stakeholders – see Section 7.3). This may be achievable as part of planned sustainable development.

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## 6. BOUNDARY REVIEW

### 6.1 Scope of Boundary Review

- 6.1.1 The inner boundaries of the Green Belt needed to be assessed to consider whether they will provide robust and defensible boundaries over time<sup>18</sup>. The integrity of the Green Belt is seriously compromised where Green Belt boundaries are constantly changing. Furthermore public confidence in Green Belt policies is very largely dependent on their certainty and longevity.
- 6.1.2 The Borough Council emphasised at the beginning of the Study that a role of the Green Belt Review was to inform the Core Strategy to provide certainty via the Local Development Framework in the Green Belt designation and therefore restrict incremental ad-hoc deletions. A role for this Study therefore is to assist in developing a better understanding of the purposes of the Green Belt and confidence in its role by providing a transparent analysis of its performance.
- 6.1.3 The assessment of the defensibility of present Green Belt boundaries is particularly important where Green Belt boundaries are adjacent to low scoring sub areas in Green Belt terms or where 'weakly' defensible boundaries are adjacent to high scoring areas. This is important since 'weakly' defensible boundaries particularly where adjoining low scoring areas can be vulnerable to future urban encroachment.
- 6.1.4 The study therefore assessed the defensibility of existing inner boundaries to the Green belt; assessed other potential boundaries within the Study Area and Wider Study Area; and provided advice on establishing long term enduring boundaries where the Green Belt may have to change.
- 6.1.5 The development of a methodology to assess the defensibility of existing Green Belt boundaries and to identify potential for future sustainable Green Belt boundaries was undertaken (Section 6.3).

### 6.2 Past and Present Boundaries

- 6.2.1 The Green Belt between Cheltenham and Gloucester was first formally approved as part of the County Development Plan Quinquennial Review in 1968.
- 6.2.2 The Development Plan viewed the open land between Cheltenham and Gloucester as being extremely vulnerable to encroachment by urban sprawl to the south and south-west of Cheltenham and the north-east of Gloucester. It was considered essential to preserve the open character of the land between Cheltenham and Gloucester and to prevent these two separate communities from merging, to severely restrict new development by the use of Green Belt policies.
- 6.2.3 The inner boundary of the Green Belt was delineated to leave unallocated areas of land between the Green Belt and designated development proposals. It was anticipated that these areas may later be allocated for specific proposals in future plans to meet local or regional demand for new development. Alternatively the Green Belt could be extended to include such areas including as compensation for Green Belt land lost elsewhere in accordance with Planning Policy Guidance Note 2.

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<sup>18</sup> Planning Policy Statement 2, Green Belts, requires that new Green Belt boundaries should be established which will endure over time.

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- 6.2.4 Since its designation the Cheltenham Green Belt has been modified a number of times, all of which have been minor in scale.
- 6.2.5 However in 1981 the Gloucestershire County Structure Plan put forward a major change to the Green Belt. The Plan proposed a major extension of the Green Belt in order to restrict further development to the north–west of Cheltenham and to prevent it merging with Bishop’s Cleeve to the north. This extension included Cheltenham Racecourse at Prestbury Park to the north of Cheltenham.
- 6.2.6 The detailed Green Belt boundaries were defined by the Adopted Cheltenham Borough Local Plan in 1986 and in the Cheltenham Environs Local Plan prepared by Tewkesbury Borough Council (the local planning authority for the adjoining area) and also adopted in 1986. The Cheltenham Environs Local Plan made more modest changes to Green Belt boundaries in The Reddings and Arle Court areas to the east and south-east of Cheltenham. These changes resulted in the release of four areas of land from the Green Belt for new development. Three of these areas have now been developed for housing while the remaining site at Arle Court has subsequently been developed for retail and commercial purposes.
- 6.2.7 The County Development Plan also left as an unallocated area land between the Green Belt boundary and existing development at Leckhampton to the south of Cheltenham. The Cheltenham Environs Local Plan originally proposed extending the Green Belt to include this land at Leckhampton. However following a Public Local Inquiry into objections to the Local Plan, the Inspector concluded that this land should remain as unallocated land.
- 6.2.8 The land was also the subject of a Local Inquiry into the Draft Cheltenham Local Plan in May 1993. The Inspector at that time assessed whether the land should be protected by being included in the Green Belt or should remain as unallocated land as a possible identified strategic reserve for new future development.
- 6.2.9 The Inspector concluded that neither the merits of the agricultural quality of the land nor certain of the constraints to development including traffic considerations were relevant to whether or not the land should be held as a strategic site for development. However he recommended that the land should not be protected as a strategic reserve in view of its varied topography, landscape history and footpath network but simply shown as unallocated land. The Council accepted the Inspector’s conclusions and the land was shown as unallocated land in the Cheltenham Local Plan which was subsequently adopted in December 1997.
- 6.2.10 The Local Plan was superseded in 2006 by the new Adopted Cheltenham Local Plan. The Plan shows the Leckhampton area as unallocated land. It also includes minor modifications to the Green Belt to remove small areas of land north of New Barn Lane and along Cool Pool Lane. The Cheltenham Racecourse was the subject of a specific policy allowing limited associated development within the built areas of the complex.
- 6.2.11 The adopted Local Plan recognises that any future releases of peripheral land for development would need to be undertaken following a critical and objective review of the Green Belt in terms of its purposes and performance against these purposes. The present study provides a context for this review.
- 6.2.12 Cheltenham Borough Council’s land area increased in April 1991 as a result of boundary changes to include the parishes of Badgeworth, Swindon, Prestbury,
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Leckhampton and Up Hatherley and the built up areas within them. As a result the Borough Council gained additional Green Belt land previously in Tewkesbury Borough Council which included the villages of Swindon and Prestbury.

### **6.3 Methodology**

- 6.3.1 Cheltenham's inner Green Belt boundary was examined during the study by the consulting team involving a desk study and site visits to determine the extent to which it can be secured and maintained in the future by 'strong' defensible boundaries. This was undertaken by the use of criteria relating to the strength of the boundaries over the long term taking account of physical events and planning decisions. Other potential 'strong' boundaries were searched for within the study area where the review found that existing inner boundaries were 'weak'.
- 6.3.2 The first stage of the analysis involved identifying all possible physical and visual boundary types and applying a classification of 'strong' or 'weak'. This was undertaken by considering what types of boundary would be likely to remain unaltered over the long or short term.
- 6.3.3 'Strong' boundaries are those that are expected to be maintained over the long term, foreseeable future and are extremely difficult to alter or destroy by physical means or by planning decision, for instance by planning consent or planning decision at appeal. 'Weak' boundaries are those that are visible but can be easily altered or destroyed by physical means or by planning decision.
- 6.3.4 In this context a boundary is defined as a recognisable linear feature or boundary between two separate areas of land.
- 6.3.5 The review then used the criteria for defensibility to decide whether the existing inner Green Belt boundaries were either 'strong' or 'weak'.
- 6.3.6 Where the inner boundaries were found to be 'weak' the review worked outwards to establish whether there were potentially any 'strong' Green Belt boundaries within the Study Areas which were physically linked to existing boundaries.

### **6.4 Criteria**

- 6.4.1 Planning Policy Guidance Note 2 requires that Green Belt boundaries should be readily recognisable and clearly defined features which are capable of being retained over time, such as roads, streams, belts of trees or woodland edges. Good practice requires that Green belt boundaries should remain over time i.e. they should be defensible against physical removal and planning decisions over a long period of time.
- 6.4.1 Table 6.1 includes a considered view as to the defensibility – either 'strong' or 'weak' - of different boundary types. These range from 'strong' boundaries such as motorways and railway lines, to 'weak' boundaries such as public footpaths.

**Table 6.1: Defensible Boundary Classification**

<b>Strong</b>	<b>Weak</b>
<ul style="list-style-type: none"> <li>• Motorways.</li> <li>• Mainline (in use) railway line.</li> <li>• District Distributor Roads forming boundary (not bisecting Green Belt).</li> <li>• Rivers, watercourses and significant drainage features.</li> <li>• Prominent physical features (i.e. ridgeline, non-intermittent waterways).</li> <li>• Protected hedgerows/woodlands.</li> <li>• Residential development with strong rear boundaries.</li> <li>• Other development with strong established boundaries.</li> </ul>	<ul style="list-style-type: none"> <li>• Non-residential development with weak or indeterminate boundaries.</li> <li>• Residential curtilages.</li> <li>• Tree-lined public footpaths.</li> <li>• Other classified roads.</li> <li>• Disused railway lines.</li> <li>• Non protected hedgerows/woodlands.</li> <li>• Power lines.</li> <li>• Rights of way.</li> <li>• Private/unmade roads.</li> <li>• Recreational field boundaries.</li> <li>• Park boundaries.</li> </ul>

6.4.2 Cheltenham's inner Green Belt boundary, adjacent to the built up area, was divided into the Zones<sup>19</sup> and then further divided into 44 segments of similar boundary character. These lengths of boundaries were given a letter and number identifier relating to the Zone. They were then classified for their defensibility (see Figure F). This was completed by viewing the aerial photographs of the area and checking them against the Local Plan. A 10% sample of the boundary results were checked on site to ensure that the defensibility of the boundaries had been correctly assessed.

6.4.3 They were categorised as either 'strong' boundaries or 'weak' boundaries. For the purposes of the review, it was assumed those areas in Zones B and D that do not currently have Green Belt status were potentially Green Belt candidates and the boundaries adjoining them were assessed accordingly.

6.4.4 Where the review considered the existing inner Green Belt boundaries were 'weak', a search was made of potential Green Belt boundaries within the Study Area which were 'strong' in terms of their defensibility and which were physically linked to existing boundaries. Potential Green Belt boundaries in the wider Study Area were also considered. The same criteria for defensibility were used and aerial photographs again examined to establish potential 'strong' boundaries. Site visits provided a check of the results.

## 6.5 Findings

6.5.1 The assessment demonstrated that much of Cheltenham's inner Green Belt boundary is strongly defensible in the foreseeable future. This maybe in part due to the establishing of strong boundaries over time to reflect the existing Green Belt.

6.5.2 The entire inner boundary in Zone A is strongly defensible, together with some 70% in Zone B and some 80% in Zone C and 75% in Zone D. Most of the boundaries in Zone E are 'strongly' defensible.

<sup>19</sup> Consistency was maintained with the Study Area Zones.

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- 6.5.3 However Zone G's entire boundary is considered to be 'weakly' defensible in the long term, together with some 60% in Zone F.
- 6.5.4 The review of 'weak' boundaries to establish potentially 'strong' Green Belt boundaries beyond the inner Green Belt boundaries found no potentially 'strong' boundaries physically linked to existing boundaries. The stakeholder workshops generally endorsed this view (Section 7.3).
- 6.5.5 However the workshops (see Section 7.3) also considered what potentially 'strong' Green Belt boundaries might be appropriate where existing boundaries were 'weak'. Many participants thought a 'strong' boundary formed by the construction of a north–west relief road could be defensible boundary to the Green Belt and some mentioned the mainline railway line.
- 6.5.6 Mention has been made of the use of areas of land which could visually contain the built up area as defensible Green Belt boundaries. In this context the Hunting Butts ridge of land running east–west at the north of Cheltenham has been put forward as a potential boundary.
- 6.5.7 However the land at Hunting Butts does not form a definable linear feature. Whilst the ridge would afford an element of visual containment, it would not provide a defensible boundary for Green Belt purposes.
- 6.5.8 The longevity of existing Green Belt boundaries also provides a defence against urban encroachment even where the boundaries are 'weak'. However the strengthening of existing 'weak' boundaries – for instance, as part of Urban Fringe management initiatives – would help ensure long term Green Belt boundary defensibility.

## **6.6 Relationship with Core Strategy**

- 6.6.1 The Core Strategy of the emerging Local Development Framework will need to establish defensible boundaries for the Green Belt which will constitute an important and fundamental part of the Strategy. The Core Strategy will need to establish the extent of the Green Belt and how future levels of sustainable development will be accommodated to satisfy Regional and Structure Plan development requirements.
- 6.6.2 Any new Green Belt boundaries would have to be “created” since no other boundaries within Cheltenham Borough's area are considered to be defensible.
- 6.6.3 This would need to be “masterplanned” using structural planting, new road corridor design, and urban design in order to create a new 'strongly' defensible Green Belt boundary. This could form part of the new LDF working closely with Tewkesbury BC in particular.

## **6.7 Long Term Boundaries**

- 6.7.1 Boundaries in the very long term beyond 2026 would need to be determined using a similar process to the current Review, but preferably carried out jointly particularly between the authorities of Cheltenham and Tewkesbury. The timing of such a review could be based on the Review of the RSS after 2020 and feed into the review of Cheltenham and Tewkesbury's Local Development Frameworks.



- 6.7.2 The authorities should endeavour to minimise any further changes to Green Belt boundaries between the current Local Development Framework – and conformity with the draft Regional Spatial Strategy and its review after 2020.

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## **7. COMMUNITY INVOLVEMENT**

### **7.1 Introduction**

7.1.1 AERC was engaged by Cheltenham Borough Council in October 2006 to undertake the review of the Green Belt around Cheltenham. The project brief included a requirement to undertake public consultation consistent with the principles of the Borough Council's adopted Statement of Community Involvement. Whilst not a Development Plan Document (DPD), this review provides part of the evidence base to be used by the Borough Council in the production of Local Development Documents

7.1.2 In all, three stages , public consultation has been woven into the work programme, as follows:

I) Stage One

A General Consultation, involving the despatch of a circular letter to all stakeholders with an interest in the Green Belt, inviting views by Monday 18 December 2006. This stage was complemented by publicity on the Council's web-site , in the local press and local radio.

II) Stage Two

A Stakeholder Workshop, which was held at the Cheltenham Town Hall on 4 December 2006. This was followed by a Councillors' Seminar, at the Municipal Offices on 13 December. The seminar was attended not only by Members of Cheltenham Borough Council, but also Gloucestershire County Council and Tewkesbury Borough Council

III) Stage Three

A General Meeting of all interested parties, held at the Town Hall on 10 January 2007, at which the consultants outlined their initial findings and invited reactions and comments.

### **7.2. Stage One: Preliminary Consultation**

7.2.1 This section summarises the results of Stage One of the consultation process. As outlined above, the basic process involved the despatch of a consultation letter to local stakeholders, as agreed with the Borough Council. The text of the letter is set out in Appendix A7.1 to this report, together with the list of addressees in Appendix A7.2. In all, over 200 letters were sent out and 30 replies were received by the closing date of 18 December, an initial response rate of approximately 15%. In addition, a further eleven representations were received after the closing date – these have also been taken on board in the analysis in section 7.2 below. The list of respondents is set out in Appendix A7.3.

7.2.2 As the draft letter at Appendix A7.1 shows, the consultation letter contained a number of questions about the Green Belt. These were derived from the project brief and were included both to help respondents to frame their replies and to provide a focus for subsequent analysis. This report therefore is structured around the initial seven questions. Not all the replies, however, addressed the questions directly, so

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there is a section headed General Remarks which covers the more wide-ranging points which were made.

### **Analysis**

#### **Question 1 – Are the existing boundaries of the Green Belt around Cheltenham, designated in the 1960s and extended in 1981, still relevant?**

On balance, respondents thought that the existing boundaries were still relevant, although two in particular were emphatic in offering a contrary view. A number of suggestions were made for alterations to the inner boundaries around the town. These are picked up in the discussion below.

It should be remembered, however, that the current Green Belt boundaries were determined before the issue of Planning Policy Guidance Note 2 (PPG2) in 1992. In this PPG2, the purposes of the Green Belt were extended to include recreation and protection of the countryside. The policy context for the Green Belt is therefore very different to that which prevailed in the 1960s and 1980s.

#### **Question 2 – What are the current main roles and purposes of the Cheltenham Green Belt?**

The predominant view was that the main purpose of the Green Belt was to prevent the merger of Cheltenham with surrounding urban areas. In particular, respondents thought that its most important role was to prevent the merger of Cheltenham with Gloucester, also between Cheltenham and Bishop's Cleeve. There was also a strong view that the Green Belt did help to control urban sprawl, particularly on the periphery of the town. Some respondents thought that it helped to preserve the setting of the historic town.

#### **Question 3 – What are the critical areas of the Green Belt which should be protected at all costs?**

Following from the answers to Question 2, it was hardly surprising that the area mentioned most often was the gap between Cheltenham and Gloucester (the Golden Valley area). A number of particular locations were mentioned, although some of these were outside the Borough boundaries, but within the Study Area. These included Shurdington and Brockworth.

The second most-frequently mentioned area was the gap to the north of the town, between Pittsville and Bishop's Cleeve, and the area around the Racecourse. Some areas to the west and south west were also cited, including Uckington, Swindon Village, Fiddlers Green, The Reddings, and the area from Up Hatherley Way to Grovefield Way.

#### **Question 4 – Are there any particular areas of the Green Belt which are degraded and/or vulnerable to development pressures?**

One respondent stated that all parts of the Green Belt were vulnerable. In a sense this may be true, but there were some strong views about certain parts which were considered either to be more vulnerable or were subject to development pressures. A number of these views concerned the Leckhampton area, including the area of unallocated land, which is not in the Green Belt. Several respondents mentioned areas to the west and north-west of the town, particularly around Swindon Village.

The Staverton Airport complex was also listed, although this is beyond the defined study area. There was less concern about the area to the north, although Bishop's Cleeve was mentioned.

**Question 5 – What are the particular physical or landscape features which form strong existing Green Belt boundaries, or could be used as boundaries to the Green Belt in future?**

The main problem with the definition of boundaries is that, for the most part, there are very few strong physical features on the ground. Not surprisingly. Many respondents mentioned the Cotswolds scarp, the bulk of which is protected by the Area of Outstanding Natural Beauty (AONB) designation. Several replies considered that this was adequate and the AONB should not overlap with the Green Belt. A few particular locations were mentioned but these were all, with one exception, within the general area to the north and east of the town. The exception was the airport which was considered by some to be a strong physical boundary.

One reply in particular recognised the lack of strong existing features. The respondent considered that the Borough Council would need to create new boundaries as part of its Local Development Framework.

**Question 6 – What is the relevance and effectiveness of the Green Belt boundaries as shown on the Cheltenham Local Plan?**

There was a very low level of response to this question. One view was that the current boundaries remain relevant and are effective. Two particular areas that were mentioned were Swindon Village and Leckhampton. In the former, the Green Belt was considered to be important in protecting the identity of Swindon Village. In the latter, it gave protection to the green areas around Leckhampton.

**Question 7 – What areas of the Green Belt or adjoining land might be able to accommodate sustainable new development in the future?**

Although there were some general anti-development views, the balance of opinion was towards the north-west of Cheltenham, in the form of an urban extension to the town. It is difficult to say to what extent this had been influenced by previous discussions and by the policy in the draft South West Regional Spatial Strategy. There was a view that development should be coupled to the building of a North-West Bypass to the town. Individual locations mentioned included land between Bishop's Cleeve and Cheltenham, including land at Hunting Butts Farm. The area around Staverton Airport was also cited, although this is outside the Study Area.

**General Views**

- 7.2.3 Not all the replies addressed the seven questions, and there were a number of general views which were of note. The most significant of these was that the Green Belt should be extended to include the unallocated land at Leckhampton and to strengthen the protection against development in the areas around Leckhampton and Shurdington.
- 7.2.4 Other responses were more wide-ranging. The South West Regional Development Agency supported the retention and development of more land for employment. The Environment Agency was against any development on designated flood plains. One respondent stated that the Green Belt was an important location for waste treatment

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facilities. There was also a view that the Green Belt and the AONB complemented each other and should continue to do so.

### **Summary**

7.2.5 Although the level of response was moderate, a number of conclusions may be drawn from the replies, as follows:

- On balance, the existing Green Belt boundaries around Cheltenham still have some relevance;
- The main role and purpose of the Green Belt is to separate Cheltenham from surrounding urban areas, especially in the gaps between the town and Gloucester and Bishop's Cleeve. There was also a strong view that the Green Belt prevented urban sprawl around the edges of the town;
- The critical areas for protection were also the gaps between Cheltenham and Gloucester and Bishop's Cleeve respectively;
- Several areas are degraded or subject to development pressures – the most critical would appear to be around Leckhampton and Swindon Village;
- There are no particularly strong physical boundaries to the Green Belt, although there is a strong relationship between it and the Cotswold AONB to the east;
- There are no strong views about the relevance and effectiveness of the current Green Belt, although it does appear to give particular protection to the area around Swindon Village and Leckhampton;
- The area to the north and west of the town may be able to support sustainable new development in the longer term; and
- A strong view was expressed that the Green Belt should be extended in the Leckhampton area, to embrace the land currently shown as unallocated land on the Local Plan.

7.2.6 In all 18 of the total of 41 written responses (44%), by letter and by e-mail, were mainly concerned with the Leckhampton area.

7.2.7 This analysis is only part of the work being done on the Green Belt Review. Nevertheless, the conclusions will help to complement the results of the Stakeholder Workshop and the Councillor Seminar held in early December 2006. Taken together, the results of the consultation informed the technical analysis of the Green Belt and the findings of the study.

## **7.3 Stage Two: Stakeholder Workshop**

### **Introduction**

7.3.1 This section summarises the results of Stage Two of the consultation process. First, it describes the Stakeholder Workshop and sets out the findings of the sessions. A list of those attending is attached as Appendix A7.4 to this report. Second, there are the results of the Councillors' Seminar – the attendance list is in Appendix A7.5. The

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final part summarises the two sessions and draws out the points which are common to both.

- 7.3.2 The Stakeholder Workshop was attended by 32 people, representing a wide range of regional and local organisations and groups. Two officers from the South West Regional Assembly also attended the event as observers. Following a general introduction from the consultants, the participants were divided into groups for the rest of the day. The allocation to the groups was deliberately organised so that each group contained a mixture of interests and affiliations. A facilitator was assigned to each of the groups, to stimulate discussion and to manage the proceedings. Each of the groups appointed a spokesperson to report back at each of the stages.

### **Workshops**

The five workshops were as follows:

#### **Workshop No.1 – Roles and Purposes of the Green Belt**

Participants were asked to consider the roles and purposes of the Green Belt, as set out in Planning Policy Guidance Note 2 (PPG2) and how they related to the area around Cheltenham.

#### **Workshop No.2 – SWOT Analysis of the Green Belt**

The Groups were asked firstly to give their views on the strengths and weaknesses of the Green Belt. They were then asked to set out the opportunities for strengthening and enhancing it, and consider the threats from factors such as development pressures, degradation, or poor management.

#### **Workshop No.3 – Sector Analysis**

Using large-scale maps of the Green Belt, each Group was asked to record the areas of highest value in terms of their contribution to the Green Belt and its overall purposes. Conversely, the Groups were also asked to show the areas which, in their view, were of least value or showed pressures for development.

#### **Workshop No.4 – Physical Features**

Groups were asked to identify on the maps the physical features which already made, or could make, strong defensible boundaries for the Green Belt.

#### **Workshop No.5 – Patterns of Development**

With maps of the Wider Study Area, participants were asked to discuss possible sustainable patterns of development for the long term future.

### **Workshop Findings**

A summary of the findings from each of the workshops is set out below.

#### *Workshop No.1 – Summary of Findings*

The five purposes of the Green Belt (PPG2) were as follows:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

7.3.3 There was a view, expressed in all the groups, that perhaps all of the five purposes of the Green were equally relevant. Nevertheless, the highest ranked purpose was the second in the list above – essentially to prevent the merger of Cheltenham with Gloucester and with Bishop's Cleeve. The second highest ranking was given to the first purpose, in that the Green Belt had checked the unrestricted sprawl of the town of Cheltenham upon the surrounding areas of countryside, thereby helping to protect the rural setting of the town (the third purpose).

7.3.4 Many participants thought that the Green Belt had economic benefits for tourism. Moreover, it had assisted in the regeneration of parts of the town by encouraging the redevelopment of key sites. There was some support for the preservation of the setting and special character of Cheltenham as an historic town. Nevertheless, there were some participants who did not think that Cheltenham was an historic town.

### **Workshop No.2 – Summary of Findings**

7.3.5 The first part of the SWOT analysis looked at the strengths of the Green Belt. It was noticeable that many of the points made in the first workshop came through in the second. The main strength of the Green Belt was the fact that it maintained the separation between Cheltenham and Gloucester and Bishop's Cleeve. It also helped to protect the setting and character of villages within the Green Belt, such as Swindon and Uckington.

7.3.6 A number of weaknesses were referred to, principally that the Green Belt actually stifled economic development within its designated area. Although it had succeeded generally in preserving the countryside, there were instances where development had been permitted in terms of special circumstances, such as the landfill site to the north west of the Borough. A number of specific areas were referred to – these are listed below under Workshop No.3.

7.3.7 In terms of opportunities, there was a general feeling that the Green Belt provided opportunities for countryside recreation and leisure. The economic benefits relating to tourism were cited, also the benefits for biodiversity and landscape enhancement.

7.3.8 A number of weaknesses were mentioned, relating mainly to the perceived pressures for development in the Green Belt. Particular areas listed were Hunting Butts Farm and the area to the north and west of the town, Swindon Village and Uckington, and the area around Leckhampton.

### **Workshop No.3 – Summary of Findings**

7.3.9 The results of this mapping exercise served to amplify the points which had been made by participants in the first two workshops. In terms of the areas of highest value, the two main areas were to the north, between Cheltenham and Bishop's Cleeve and to the south-west, between the town and Gloucester. Participants also valued the protection given to Swindon Village and its setting, and to the area around Leckhampton. The complementary role of the Green Belt and the Cotswolds Area of

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Outstanding Natural Beauty was also deemed to be important to the east of the town and the enhancement of its setting.

- 7.3.10 The areas of least value were mainly to the north-west and west of the town, although most of the areas cited were outside the Borough boundary. There was a greater reference to the areas considered to be under threat, including Swindon Village, Hunting Butts Farm, and the area around Leckhampton. The main sector under threat was thought to be to the west and north-west, a view which seemed to have been prompted by the draft Regional Spatial Strategy (RSS).

#### **Workshop No.4 – Summary of Findings**

- 7.3.11 The results of this workshop were less conclusive than the other sessions. Not surprisingly, the Cotswold Ridge was the feature most frequently mentioned, although this is not within the Green Belt. Nevertheless, it was considered that the Green Belt, particularly around Prestbury, provided the setting for the AONB beyond.
- 7.3.12 Few physical features were mentioned in the other parts of the Green Belt, apart from Leckhampton Hill. Many participants pointed out that the urban edge itself had been defined by the Green Belt, and performed an important function in providing a strong boundary between the town of Cheltenham and the countryside beyond. For much of its length this part of the inner boundary was also the municipal boundary between Cheltenham and Tewkesbury Boroughs.

#### **Workshop No.5 – Summary of Findings**

- 7.3.13 In their replies, many of the participants had been influenced by the earlier consultation by the South West Regional Assembly on the Cheltenham/Gloucester Strategic Green Belt Study and the draft RSS. It was not surprising, therefore to find that the main area mentioned was to the north-west towards Junction 11 of the M5 motorway. A sustainable corridor of development would probably include Uckington and Swindon Villages. Many participants thought that any development should be coupled to the construction of a north-west relief road. Some thought the existing mainline railway was potentially a 'strong' boundary for future sustainable development.
- 7.3.14 There was also support for a northern corridor of development between Pittville and Bishop's Cleeve, to include Hunting Butts Farm. This would be coupled to the development of a public transport route.
- 7.3.15 There was a marked reluctance by many participants to suggest areas for development. Indeed, there was a strong view that protection should be the main thrust of policy, accompanied by the development of 'brownfield' sites within the town itself.

#### ***The Councillors' Seminar***

- 7.3.16 The Councillors' Seminar was held on the evening of 13 December at the Municipal Offices, between 5.30 and 8.30pm hours. Over forty Councillors attended (see Appendix 2), mainly from Cheltenham Borough Council, but also from Tewkesbury Borough Council and Gloucestershire County Council. Officer observers were present from these three authorities, together with officers from Gloucester City Council and the South West Regional Assembly.



- 7.3.17 After an introductory presentation from AERC, the participants were divided randomly into four groups. Each group was provided with a facilitator and was asked to nominate a spokesperson for the feedback. The seminar was organised as a truncated version of the earlier Stakeholder Workshop, with three sessions, as follows:

#### **Group Session 1 – Role and Purposes of the Green Belt**

Participants were asked to consider the five purposes of the Green Belt as set out in PPG2 and to rank them in importance as applied to Cheltenham.

#### **Group Session 2 – Analysis of Green Belt Value**

This was a mapping exercise. The Groups were asked to look at a map of the Green Belt Study Area and to indicate on it the areas of high value and low value against the stated purposes in the first exercise. They were also asked to show those areas which were considered to be under most pressure from development.

#### **Group Session 3 – Future Patterns of Development**

Using the maps provided, the Councillors were asked to show which areas, in their view would provide the basis for sustainable patterns of development in the long term future.

- 7.3.18 Not surprisingly, all of the Group sessions exposed a number of issues and prompted a debate which became livelier as the evening progressed. The findings are summarised below.

#### **Group Session 1 – Summary of Findings**

- 7.3.19 In the first session, the groups were provided with a list of the five purposes of the Green Belt and asked to explore their relevance to Cheltenham. They were also asked to rank the purposes. The results of the ranking were as follows:

<b>Purpose</b>	<b>Ranking</b>
<i>To check the unrestricted sprawl of large built-up areas</i>	<i>2<sup>nd</sup></i>
<i>To prevent neighbouring towns merging into one another</i>	<i>1<sup>st</sup></i>
<i>To assist in safeguarding the countryside from encroachment</i>	<i>3<sup>rd</sup></i>
<i>To preserve the setting and special character of historic towns</i>	<i>5<sup>th</sup></i>
<i>To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</i>	<i>4<sup>th</sup></i>

These results informed the ranking used on the review (Section 4.8).

- 7.3.20 As can be seen, the most important role of the Green Belt was that it provided the strong gap between both Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve. Councillors also agreed that the policy had also helped to prevent the outward sprawl of the town, although it was not a "large built-up area" in the terms of PPG2. The main effect of this was the protection of the countryside and the setting of the town, which had a number of environmental and economic benefits.

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## Session 2 – Summary of Findings

- 7.3.21 In this session, many Councillors were of the view that the whole of the Green Belt was of equally high value and should be protected. Others referred to the complementary and mutually-supporting roles of both the Green Belt and the Cotswolds AONB. Nevertheless, a number of areas were highlighted as being of high value, to be protected at all costs, some of which were not within the Borough boundaries. Within the Borough, the most important sector was to the north, between Cheltenham and Bishop's Cleeve – the area around Hunting Butts was especially mentioned. The other area of high value was around Swindon Village, on the western side of the Borough. Outside of the Borough, areas with the most mention were to the west of Uckington (towards the M5 motorway) and around Brockworth.
- 7.3.22 Councillors were reluctant to suggest areas of low value. The only area cited was around Uckington, much of which is outside the Borough Council boundary. Nevertheless, this is an important gateway into the town from the west.
- 7.3.23 Many Councillors thought that the whole of the Green Belt was under some degree of pressure from development. There was a great deal of concern about the area around Leckhampton, some of which was in Tewkesbury Borough. Within Cheltenham, there was debate over the area of unallocated land at Leckhampton, not currently within the Green Belt. Other areas mentioned were around Swindon Village and the general area to the west, most of which was in Tewkesbury Borough.

## Session 3 – Summary of Findings

- 7.3.24 This caused most difficulty for participants, many of whom were reluctant to commit themselves to a long term view of the area and possible development patterns. After a lively debate, one of the groups made a formal statement saying that it was not willing politically to come to a view.
- 7.3.25 The other groups did collectively come up with some views. The highest degree of consensus was for a corridor of development to the west, from Cheltenham up to and including the suggested area of development around Junction 10 of the M5 motorway. There were a number of queries about how this would affect the Green Belt on the western edge of the Borough. Many thought that any development should be coupled to the construction of the north-west bypass.
- 7.3.26 There was some support for long term development to the north of Cheltenham, possibly with a light rail connection to Bishop's Cleeve. Any development in this sector, however, should be accompanied by compensatory extensions to the Green Belt to the north of Bishop's Cleeve. One group suggested that light rail or some form of public transport should be considered between Cheltenham and Gloucester. No specific links to housing developments were suggested, however, apart from an intensification of development within the urban area. Many participants questioned the future of the area around Leckhampton, which should be decided in tandem with the Local Development Framework process.

## Summary

- 7.3.27 In summary, there did appear to be a number of points which were common to both the Stakeholder workshops and the Councillors' Seminar. These were as follows:

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- 7.3.28 With regard to the role and purposes of the Green Belt, there was a clear consensus that the most important role was the prevention of the merger between Cheltenham and the adjacent towns of Gloucester and Bishop's Cleeve. In addition, both the sessions seemed to place some value on the role of the Green Belt in checking the outward sprawl of the main urban area, in turn protecting the countryside around.
- 7.3.29 These views were reflected in the SWOT analysis of the Green Belt at the Stakeholder Workshops. The main weakness of the policy was that it constrained development. There were opportunities for the development of countryside recreation and tourism and for biodiversity and landscape protection. The main threat was from development pressures, especially to the north-west and the west, although concern was registered about the vulnerability of the Leckhampton area.
- 7.3.30 The sector analysis reflected these concerns, at both events. At the Councillors' Seminar, the Groups were generally concerned about pressures in the areas generally to the west, especially around Swindon Village.
- 7.3.31 At both events the apparent lack of strong physical boundaries was voiced. The only major feature was the Cotswolds Scarp, which is part of the AONB. Nevertheless, the Green Belt and AONB policies do appear to complement each other on the eastern side of the Borough.
- 7.3.32 There were some ideas on future patterns of sustainable development, particularly at the Stakeholder Workshops. Together there was a strong consensus for a corridor to the west leading to Junction 10 of the M5 motorway. It was thought that any such development should be linked to the completion of a north-west bypass.
- 7.3.33 At both events, participants were asked for any further ideas and suggestions about the future of the Green Belt. The most significant were about the vulnerability of the area around Leckhampton. There many suggestions for the area of unallocated land to be included in the Green Belt following the current review.
- 7.3.34 This analysis forms only a part of the work being done by AERC on the Green Belt Review. Nevertheless, the conclusions set out in this section complement the results of Stage One of the consultation, summarised above. Taken together, the conclusions arising from the public consultation exercises have helped to inform the technical analysis of the Green Belt and the findings of the study as a whole.

#### **7.4 Stage Three: Public Forum**

- 7.4.1 Further presentations and debate took place at the public forum on the Green Belt Review on 10 January 2007.
- 7.4.2 The objective of the forum was to provide information on why the Green Belt review was being undertaken and present emerging findings. A staff member of Cheltenham Borough Council took detailed notes of the proceedings, which can be found in Appendix A7.6.
- 7.4.3 Almost 300 people attended the Forum, a clear indication of the degree of interest in the Green Belt. Feedback from the session was used by the consultants in the revision of the draft in the light of the comments made. Additional work was done on some of the key issues which were raised by the participants. The scoring of many of the sub-areas was revisited and validated, with site visits and discussions with Borough Council officers.

- 7.4.4 Feedback has also led to changes in the way in which the findings are now presented in this report. At the Forum, there was an invitation to participants to make further observations – there were several responses which are included in the list in Appendix 7.3.
- 7.4.5 The consultation process, and the positive response from local people and organisations, has been a valuable part of the Green Belt Study. It has informed and enhanced the research and will enhance the Borough Council's evidence base for the Local Development Framework. The consultants would like to thank all those who have taken the time and effort to contribute.

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## 8. CONCLUSIONS

### 8.1 Conclusions from Study

- 8.1.1 The Cheltenham Green Belt Study is one of a number of studies which will provide guidance for and inform the preparation of the Cheltenham Local Development Framework. Whilst establishing the extent of the Green Belt and its future protection are important parts of the process, the Local Development Framework will need to address many other issues including the need to accommodate sustainable new development.
- 8.1.2 The review of Cheltenham's Green Belt has taken place against complex administrative and planning policy backgrounds. The Borough boundary is very tightly drawn around the town and nowhere provides even the minimum depth of countryside normally required to meet the requirements of a functional green belt. To this extent the Cheltenham Green Belt is dependent upon abutting areas within Tewkesbury Borough and Cotswold District Council to meet those requirements.
- 8.1.3 The planning policy context is no less complex, in that the Gloucestershire Structure Plan is being replaced by a new Regional Spatial Strategy and Sub Regional Strategies, and the Local Plans covering Cheltenham's Green Belt are being replaced by new Development Plan Documents that will provide the Local Development Framework.
- 8.1.4 The Cheltenham Green Belt Review has, however, been able to draw on the earlier Joint Green Belt Study of the Gloucester and Cheltenham Green Belt, and an independent review of other Sub-Regional Green Belt studies in the South West Region, as well as the draft RSS proposals.
- 8.1.5 Consequently the study findings and the conclusions set out below should be relevant to the tasks of Cheltenham Borough Council in preparing the LDF Core Strategy and other development plan documents. They should also provide an objective basis to assist the dialogue between the local authorities in the sub-region on key planning issues that affect, and are affected by, the Green Belt.
- 8.1.6 The following conclusions start with Green Belt policies and thereafter follow the sequence of chapters earlier in the Report.
- 8.1.7 The Study concludes that of the four existing Green Belt policies within the Local Plan, three policies, CO48, CO50 and CO51, contribute positively to Green Belt purposes, pass the relevant "Tests of Soundness" required by Planning Policy Guidance 12, and are "fit for purpose" for inclusion in the emerging Local Development Framework.
- 8.1.8 The fourth Green Belt policy, policy CO49, is capable of contributing to Green Belt purposes and being 'sound' if minor amendments are made to it.
- 8.1.9 One non-Green Belt policy in the Local Plan, policy TO113 relating to Cheltenham Racecourse, could also contribute to Green Belt purposes, and could be included in the emerging Local Development Framework as a Green Belt Policy subject to restrictions on the use of the land, and the type and area defined for associated

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development. The key sub regional role of the Racecourse within the Green Belt was identified and should be recognised in the LDF.

- 8.1.10 The Review demonstrates that within the detailed Study Area all the Green Belt land assessed by the study contributes to the achievement of Green Belt purposes. A number of the sub areas (15) contribute significantly more to achieving Green Belt purposes than the others (63).
- 8.1.11 The ranking of the purposes used in the assessment reflect the view (shared by stakeholders) that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, and checking urban sprawl.
- 8.1.12 The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve generally contributes more to achieving Green Belt purposes than other areas.
- 8.1.13 Sub-areas to the north-west and west of Cheltenham scored lowest against Green Belt purposes.
- 8.1.14 The non-Green Belt land included in the detailed study area between the Green Belt and the built-up area, did not achieve high scores and would not make a major positive contribution to Green Belt purposes by virtue of designation as Green Belt, with the exception of one sub-area to the south-east of Swindon Village.
- 8.1.15 The unallocated land at Leckhampton included within the detailed study area did not produce scores in the high category against the defined Green Belt purposes. Based on this criterion alone, if it was included in a search for compensatory Green Belt within Cheltenham, its designation as Green Belt would not be justified.
- 8.1.16 There are limited opportunities therefore to provide suitable "compensatory" Green Belt, to replace land lost to development, within Cheltenham Borough. Greater opportunities for compensatory Green Belt provision outside Cheltenham Borough would require agreement with adjoining local authorities, particularly Tewkesbury Borough Council in the context of the new RSS.
- 8.1.17 The Cheltenham Green Belt also serves other roles and objectives apart from the five defined Green Belt purposes set out in PPG2. These include providing for improved access to the countryside, greater leisure opportunities, and opportunities for greater biodiversity. Stakeholder consultations confirmed that the Cheltenham Green Belt has the potential to achieve these and many other additional roles.
- 8.1.18 The results of the Green Belt purposes analysis should be used by Cheltenham in the process of considering the future development framework for the Borough, and in discussion at Regional level on the scale and location of future development.
- 8.1.19 Future changes to the Green Belt will need to take account of important constraints to new development, and particularly the AONB and areas at risk from flooding.
- 8.1.20 Peripheral western and north-western areas of the Borough could provide a basis for future sustainable development patterns, where identified by the Study as areas with

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cross-boundary sustainable development potential. Such areas all affect the neighbouring parts of the Wider Study area within Tewkesbury Borough.

- 8.1.21 Sustainable development opportunities do not coincide with areas free from major constraints, or with areas making least contribution to Green Belt purposes, with one exception, this being the area to the north-west of Swindon Village.
- 8.1.22 The Study found that much of Cheltenham's inner Green Belt boundary is likely to be defensible in the foreseeable future either by virtue of its long establishment or its strong boundary features.
- 8.1.23 However the Study was unable to identify alternative defensible boundaries to those that already exist, or even alternatives that would be more defensible than the weaker existing Green Belt boundaries in the Borough.
- 8.1.24 Where weak Green Belt boundaries exist, these should be strengthened through the LDF, either as part of the process of defining new land allocations or through land management in consultation with landowners.
- 8.1.25 The emerging Local Development Framework (LDF) will therefore need to create and establish defensible boundaries for the long term Green Belt through "masterplanning", using structural planning, road and other transport corridor design, and urban design principles. This is likely to comprise an important element of that Framework when establishing the extent of the Green Belt and accommodating future sustainable development to satisfy Sub-Regional development requirements.
- 8.1.26 The areas contributing least to Green Belt purposes would not necessarily be the locations which would be most sustainable for future development. This is demonstrated by Figure G which is a composite plan showing all the various constraints and opportunities in relation to Green Belt performance.
- 8.1.27 More general conclusions to be drawn from the Review of Cheltenham's Green Belt are twofold. Firstly, that the Green Belt has been successful in preventing the merging of Cheltenham with Gloucester despite constant pressure for development along the A40 corridor between the towns, and between Cheltenham and Bishop's Cleeve, despite the narrow gap in the area of Cheltenham Racecourse.
- 8.1.28 Secondly, despite a number of minor changes to Green Belt boundaries and development of some land on the edge of the town, the integrity of Cheltenham's Green Belt remains, and is considered to be of fundamental importance by people in the town.

## **8.2 Use of Findings**

- 8.2.1 Finally there are conclusions to be drawn from the Study on the use of the findings by Cheltenham Borough Council.
- 8.2.2 Firstly, the individual elements of the Study will contribute to the evidence base for the Borough's emerging Local Development Framework.
- 8.2.3 Secondly, the study findings can assist the difficult decision-making process on new land allocations and definition of long-term Green Belt boundaries.

- 8.2.4 The Study's findings can be used to focus the attention of the LDF on existing Green Belt boundaries that need to be reinforced.
- 8.2.5 The Constraints analysis can be used to highlight the need for the resolution of constraints where these may otherwise impede sustainable development opportunities, and to help shape future land allocations.
- 8.2.6 The areas with sustainable development potential identified by the Study that cross the Borough boundary can be considered as part of the decision-making process on future allocations and development proposals required to meet sub-regional needs, and related planning policies.
- 8.2.7 Results from the Study do not reveal a consistent pattern in terms of constraints, sustainable development and contribution to Green Belt purposes, but they will provide a sound basis for decision-making when used in combination with other studies undertaken to support the emerging LDF.



## GLOSSARY

Definition of terms used in the Report for the purposes of the Study.

**Adoption:**

The final confirmation of a development plan or Local Development Document by a local planning authority (LPA).

**Area of Outstanding Natural Beauty (AONB):**

An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Together with National Parks, AONB represent the nation's finest landscapes and are now designated by the Countryside Agency.

**Bio-Diversity:**

The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Previously Developed Land (Brownfield Land):**

Land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed-surface infrastructure. The definition covers the curtilage of the development. Planning Policy Statement 3 (Housing) has a detailed definition

**Coalescence:**

The merging or coming together of separate towns or villages to form a single entity.

**Conservation Area:**

Designated area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

**Development Plan:**

A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. It includes Unitary, Structure, and Local Plans prepared under transitional arrangements.

**Dwellings:**

A self-contained building or part of a building used as a residential accommodation, and usually housing a single household. A dwelling may be a house, bungalow, flat, maisonette or converted farm building

**Government Planning Policy:**

Planning Policy Guidance Notes (PPG's) issued by central government setting out its national land use policies for England on different areas of planning. These are gradually being replaced by Planning Policy Statements (PPSs).

**'Infill' Development:**

The development of a small undeveloped gap between existing buildings within an otherwise continuously developed frontage.

**Infrastructure:**

Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.

**Inset Diagram:**

A development plan map showing a particular area of interest on the wider proposals map at a larger, more readable scale.

**Local Development Documents (LDDs):**

These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area

**Local Development Framework (LDF):**

A number of LDDs which together provide strategic policies (The Core Strategy) and more detailed policies and proposals for a local authority's area.

**Local Development Scheme:**

The local planning authority's time-scaled programme for the preparation of Local Development Documents that must be agreed with government and reviewed every year.

**Local Planning Authorities:**

The local authority or council that is empowered by law to exercise planning functions.

**Local Plans:**

An 'old-style' development plan prepared by district and other local planning authorities. These plans will continue to operate for a time after the commencement of the new development plan system, by virtue of specific transitional provisions

**Regeneration:**

The economic, social and environmental renewal and improvement of urban and rural areas to provide long term and sustainable improvements.

**Regional Planning Guidance (RPGs):**

Policy and guidance issued for each region in England by the Secretary of State. As part of the reform process the existing RPG becomes the spatial strategy for the region until revised by a replacement Regional Spatial Strategy (RSS).

**Regional Spatial Strategy:**

A strategy for development of a region over 15 to 20 years and longer. The Regional Spatial Strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure and economic development. Regional Spatial Strategies are prepared by Regional Planning Bodies.

**Section 106 Agreements:**

A legal agreement under Section 106 of the 1990 Town & Country Planning Act. Such agreements are legally binding agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain works related to a development are undertaken.

**Sustainable Development:**

Development that achieves the following four inter-related and equally important objectives.

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- prudent use of natural resources; and
- maintenance of high and stable levels of economic growth and employment; and

Achieving sustainable development is therefore about achieving a balance of these four objectives.

**Sites of Special Scientific Interest (SSSIs):**

A site identified under the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (basically, plants, animals, and natural features relating to the Earth's structure).

**Structure Plans:**

An 'old-style' development plan, which sets out strategic planning policies and forms the basis for detailed policies in local plans. These plans will continue to operate for a time after the commencement of the new development plan system, due to transitional provisions under planning reform.

**Urban Fringes:**

The urban fringe is the transitional area between urban areas and the countryside. It can provide a valuable resource for the provision of sport and recreation, particularly in situations where there is an absence of land within urban areas to meet provision.

**Urban Extension:**

The planned expansion of a city or town which can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities.

**Urban Regeneration:**

Making an urban area develop or grow sustainably through job creation and environmental renewal.

**Urban Sprawl:**

The uncontrolled or unplanned extension of urban areas into the countryside.

**Unallocated Land:**

A general expression used to mean Land (and buildings) without any specific designation or allocation in a development plan, where it is intended that for the most part, existing uses shall remain undisturbed and unaltered.

**Appendix A4.1:  
Project Brief**

**CONSULTANCY PROJECT BRIEF**

**CHELTENHAM GREEN BELT REVIEW  
2006**

## THE PROJECT BRIEF

### 1. INTRODUCTION

- 1.1 Proposals are sought from consultants with the relevant experience to carry out a green belt review for Cheltenham Borough Council. The purpose of the review is to provide an independent assessment of the Cheltenham Green Belt. This review will form part of a portfolio of documents which will provide an evidence base to inform Cheltenham's Local Development Framework (LDF). Primarily it will be used to inform the preparation of the Core Strategy of Cheltenham's LDF and if required inform the draft Regional Spatial Strategy for the South West if Cheltenham Borough Council is invited to attend and/or submit further evidence to the forthcoming examination in public.
- 1.2 The study is intended to cover the whole of the green belt as identified in appendix 1.

### 2. BACKGROUND

#### Green Belt Designation

- 2.1 The Gloucestershire Green Belt was formally incorporated into the County of Gloucestershire Development Plan First Quinquennial Review which was published in 1960. It was considered "*essential to preserve the open character of the land between the towns of Cheltenham and Gloucester and to prevent these communities merging into one another*". In the 1981 Gloucestershire Structure Plan the Green Belt was extended to the north of Cheltenham to prevent the coalescence of Cheltenham with Bishop's Cleeve.
- 2.2 PPG 2 identifies five purposes of Green Belt policy:
1. To check unrestricted sprawl
  2. Prevent merging of towns
  3. Safeguard the countryside from encroachment
  4. Preserve the setting and special character of historic towns
  5. Assist with urban regeneration by recycling of other urban land
- 2.3 At the time of designation of the Green Belt two purposes were identified. The primary purpose of designation was the prevention of coalescence of Cheltenham and Gloucester (preventing the merging of towns), and Cheltenham and Bishop's Cleeve, the secondary purpose was the prevention of urban sprawl. Not all of these purposes apply across the Cheltenham Green Belt and indeed other purposes may now be relevant.
- 2.4 PPG 2 also outlines a number of objectives which green belt land should fulfil. These relate to:
- Open space and access for urban population
  - Outdoor sports and recreation
  - Securing nature conservation
  - Improve derelict land
  - Landscape quality
  - Retain agricultural and forestry land
- 2.5 The Green Belt affecting Cheltenham is tightly drawn around the urban area of the Borough, paragraph 2.8 of PPG2 states "*If boundaries are drawn excessively tight*

*around existing built up areas it may not be possible to maintain the degree of permanence that Green belts should have”.*

### **Development Plan Context**

- 2.6 The current development plan for Cheltenham is Gloucestershire Structure Plan Second Review (1999) and Cheltenham Borough Local Plan Second Review (2006). This development plan provides the planning framework for Cheltenham until its replacement under the provisions of the Planning and Compulsory Purchase Act (2004) by The Regional Spatial Strategy for the South West and the Cheltenham Local Development Framework.
- 2.7 Policy GB.1 of Gloucestershire Structure Plan Second Review states;  
*“The Green Belt between Cheltenham and Gloucester and north of Cheltenham will be maintained. Within the Green Belt only appropriate development which would not compromise the open character of the Green belt for which would not contribute to the coalescence of settlements will be permitted”*
- 2.8 Cheltenham Borough Local Plan Second Review was prepared within the context of the Gloucestershire Structure Plan Second Review and as such the Green Belt boundary as designated in 1960 and 1981 is retained and protected by policies CO 48 (definition of Green belt), CO 49 (development in the Green Belt), CO 50 (rebuilding or replacement of dwellings in the Green Belt) and CO 51 (extension of dwellings in the Green Belt).
- 2.9 In November 2002 the Third Alteration to Gloucestershire Structure Plan was placed on deposit for consultation. This plan maintained the Green Belt policy under policy SD.8 as previously set out in the Structure Plan Second Review. The justification behind policy SD.8 was that the development needs of Gloucestershire could be accommodated without the need for alterations to the Green Belt. This policy together with the Structure Plan’s approach to the allocation of development over the plan period to 2016 was subject to a Direction from the Secretary of State who considered that the Plan failed to implement the recommendations of the Panel examining the Structure Plan Third Alteration, the panel stated *“a review of the Green Belt must be part of the implementation of this Third Alteration, in order to give scope for a rational definition of boundaries for the PUA’s and to identify sites as part of the PUA to accept the requisite amount of growth in a sustainable way”*. Recommendation 6.3 of the Panel report states *“Modify policy SD.8 to include a commitment to review the Green Belt boundary”*.
- 2.10 The recommendation made by the Structure Plan Panel takes account of Regional Planning Guidance 10 which required *“the boundaries of (Gloucester and Cheltenham) Green Belts should be reviewed in the next round of structure plans”*.
- 2.11 In a letter dated 18<sup>th</sup> July 2005 to the Government Office for the South West Gloucestershire County Council formally set out the County’s response to the Direction stating *“the Direction should not be complied with and the Structure Plan Third Alteration should not be progressed to adoption”*.
- 2.12 The policies of Gloucestershire Structure Plan Second Review will be ‘saved’ until replacement by the Regional Spatial Strategy for the South West (RSS). The draft RSS has been subject to public consultation between June – August 2006 with an examination in public programmed Spring 2007 and final publication early 2008. It is within the context of the draft RSS that the review of the Cheltenham Green Belt is framed.

### **3. KEY OBJECTIVES**

#### **3.1 The Cheltenham Green Belt Study will:**

1. Identify best practice of Green Belt Reviews and critically assess these to identify a preferred methodology for Cheltenham;
2. Review the existing Green Belt of Cheltenham within the context of PPG2 consider the justification for Green Belt designation in 1960 and its extension in 1981 and whether the purposes of designation are still relevant and/or whether purposes have changed and why;
3. Within the context of the draft Regional Spatial Strategy for the South West and re-assessment of the Green Belt undertaken by the Cheltenham and Gloucester Joint Study Area critically assess the Green Belt in the context of meeting Cheltenham's development needs within the plan periods 2016 and 2026 which promote sustainable patterns of development;
4. Informed by analysis and critical assessment of the Cheltenham Green Belt identify areas where the Green Belt boundary may be re-designated (including both removal and/or addition to the Green Belt). This assessment will need to be within the context of the wider Gloucestershire Green Belt as it affects Cheltenham;
5. undertake consultation with relevant communities and stakeholders in the areas identified above;
6. Identify the inter-relationship between the Green Belt within Cheltenham Borough and the Green Belt within Tewkesbury Borough and Gloucester City that directly affects Cheltenham and the Borough's longer term sustainable development options;
7. Where any areas are identified for removal from the Green Belt to meet sustainable land use objectives what protection could be offered by policies within Cheltenham's Local Development Framework that would contribute to meeting PPG2 objectives of environmental, recreational, economic and life long learning benefits; and
8. Where any areas are identified for removal from the Green Belt to meet sustainable land use objectives identify what mitigation could be implemented which would contribute to green infrastructure provision.

### **4. METHODOLOGY**

#### **4.1 The submitted proposals should set out clearly the methodology for carrying out the Study including;**

- I. Identification of good practice
- II. Assessment of national and regional planning policies
- III. Assessment of RSS Strategic Green Belt Review and Cheltenham and Gloucester Joint Study Area Green Belt Review in the context of Cheltenham
- IV. Analysis of the existing extent of the Green Belt and purpose as designated in 1960 and 1981 and its purpose and relevance within the context of current planning policy
- V. Identification of the role and purpose of the Cheltenham Green Belt within the context of the draft RSS and Strategic Green Belt Review
- VI. Develop a ranking process which will provide a transparent mechanism with which land can be assessed against each of the five purposes of the Green Belt
- VII. Analysis of physical constraints to sustainable development in the Green Belt
- VIII. Analysis of opportunities for sustainable development in the Green Belt



- IX. Identification of a defensible Green Belt boundary within the context of plan periods 2016 and 2026
- X. Identification of a defensible Green Belt boundary post 2026
- XI. Assessment of relevance and effectiveness of Cheltenham Borough Local Plan green belt policies and assessment on whether these are fit for purpose within Cheltenham's Local Development Framework
- XII. Methods and techniques for public consultation and number of events
- XIII. Consultation with Tewkesbury Borough Council and Gloucester City Council

## 5. INFORMATION SOURCES

### 5.1 Information sources will include:

- Gloucestershire Structure Plan Second Review  
<http://www.gloucestershire.gov.uk/index.cfm?articleid=3383>
- Gloucestershire Structure Plan Third Alteration  
<http://www.gloucestershire.gov.uk/index.cfm?articleid=197>
- Cheltenham Borough Local Plan Second Review  
<http://www.cheltenham.gov.uk/libraries/templates/thefuture.asp?URN=3384&FolderID=0>
- Cheltenham Borough Local Plan Second Review: Inspectors Report  
<http://www.cheltenham.gov.uk/libraries/templates/thefuture.asp?URN=3249&FolderID=0>
- Regional Spatial Strategy for the South West [http://www.southwest-ra.gov.uk/nqcontent.cfm?a\\_id=836](http://www.southwest-ra.gov.uk/nqcontent.cfm?a_id=836)
- Colin Buchannan Strategic Green Belt Review (available via South West Regional Assembly)
- Cheltenham and Gloucester Joint Study Area Green Belt Review  
<http://www.gloucestershire.gov.uk/environment/vision2026/>
- Secretary of State Direction to Gloucestershire Structure Plan Third Alteration  
<http://www.gloucestershire.gov.uk/index.cfm?articleid=2112>

**APPENDIX A4.2:  
Process Used to Score Sub Areas**

## **APPENDIX A4.2: Process Used to Score Sub Areas**

It was important to ensure that the sub areas were scored accurately and methodically. To ensure this two people (to check one another) were involved in scoring all sub areas by deciding whether each criterion was satisfied. This ensures a standard approach to each criterion. Distance used in the assessment were measured using the base plans. Aerial photographs were used to assist the process and check the existence of features. Further checks were carried out on the field to verify the findings.

This section identifies each purpose, its defining criteria and the method used to allocate points.

### ***Purpose I: Check unrestricted sprawl of large built-up areas:***

a. Impedes ribbon development:

Aerial photography, supplied by Cheltenham County Council, was studied to determine how many houses are present along roads radiating from Cheltenham and in villages within the sub area. Four points were allocated to those sub areas that had five or more houses. Two points were given to those sub areas that had less than five houses since the sub areas still needed assistance in restricting urban sprawl.

b. Distance from Cheltenham built up area:

A midpoint was determined in each sub area and was used to determine the distance from the sub area to the outer boundary of Cheltenham built up area. A maximum distance of 2km. was chosen since this was the maximum practical distance of separation within the Study Area. Higher points were scored for those sub areas closer to Cheltenham since these sub areas provided the most important contribution toward separation.

### ***Purpose II: Prevent neighbouring towns from merging:***

a. Line of sight distance between the closest point of the sub area's outer boundary and any other urban area's outer boundary

(Excluding Cheltenham, as the purpose of the Green Belt is to protect it from merging with another urban area):

A maximum distance of 1.5 km. was established, as that is the distance from Cheltenham's built up area and the southern most point of Bishop's Cleeve built up area. Areas closer to urban boundaries scored higher to reflect the need to keep those areas undeveloped – maintaining the existing urban area boundaries.

### ***Purpose III: Assist in safeguarding the countryside from encroachment:***

a. Nature conservation value:

Sub areas that included areas with a nature conservation designation were recognised as providing significant biodiversity for which they needed safeguarding from development and therefore received higher scores. The Local Plans and 'Magic' maps were used to determine if the sub area contained any land designated (either statutorily or non-statutorily) for nature conservation interest.

b. Sites of high quality landscape character:

Ideally an appropriate Landscape Assessment would have been consulted to determine the quality of the landscape; in its absence<sup>20</sup> the consultants agreed that area within the Area of Outstanding Natural Beauty would receive high scores. The Local Plans and 'Magic' maps were used to determine if the sub area was included within the Area of Outstanding Natural Beauty.

c. Trees:

The Local Plan and 'Magic' maps were used to determine if the sub area contained any protected woodland, forest, trees or hedgerows. All sub areas that included Natural Beauty ancient or other protected woodland, forests, trees, and/or hedgerows were considered to provide additional benefit to Cheltenham's countryside and were scored accordingly.

d. Agriculture:

'Magic' maps and Agricultural Land Classification maps<sup>21</sup> were used to determine if land within the sub areas was used for agricultural purposes and the grading. All agricultural land with 1 and 2 designations was considered to be valuable and received higher scores to ensure they were safeguarded from development. Land designated as Grade 3 or below was scored lower<sup>22</sup>.

***Purpose IV: Preserve setting and special character of historic towns:***

a. Views of historic Cheltenham:

It was important to score those sub areas that provided views of Cheltenham Town Centre including its landmarks higher than others in order to protect those views, allowing future generations the opportunity to experience the vista. For this purpose, views of the Town Centre as shown in the Local Plan were assessed using the Cheltenham and Gloucester Building Society Headquarters as a locator. If development were allowed at the sub areas, it is likely that the views would no longer exist. After assessment of the Ordnance Survey maps and aerial photographs, a member of the consultancy team visited the sub areas which potentially provided such views to determine the level of visibility of Cheltenham Town Centre from a public vantage point.

b. Contribution to 'Gateway':

The workshop participants identified the importance that gateways<sup>21</sup> into Cheltenham play for residents and visitors when experiencing Cheltenham and getting a strong feel for its history, with special attention applied to the A40, A46 and the A4019. Primary and

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<sup>20</sup> Cheltenham is included in neighbouring Landscape Assessments including the Gloucestershire Landscape Assessment but these assessments have been completed on a large scale and do not identify any local differences in the landscape surrounding Cheltenham. Additionally, they identify landscape type but do not assess value.

<sup>21</sup> Ministry of Agriculture, Fisheries, and Food. 1996. Series Provisional Agricultural Land Classification, South Western Region. Printed by Cook Hammond & Kell Ltd. MAFF license GD272361.

<sup>22</sup> According to the maps supplied by MAFF, the majority of land around Cheltenham had a grade 3 status. As a sub division of grade 3 land was not possible, all grade 3 land was assumed to be of grade 3b and scored accordingly. All land of grade 1 and 2 was scored higher and non-agriculture land given no score.

secondary routes into Cheltenham were identified and local maps were used to determine the distance each sub area has from various routes into Cheltenham. The closest point on each sub area's boundary was used for measurement. All main road and existing railway line routes were used.

c. Conservation Area:

Sub Areas which contained Conservation Area or were adjacent to them were scored highly to reflect their importance. The Local Plan was studied to determine whether or not a sub area contained or was adjacent to a Conservation Area.

**APPENDIX A4.3:**

**Green Belt Purpose and Related Criteria, Points, Weights and Scores  
(The process by which the points were weighted and had a ranking applied to them to  
given total scores is set out in Section 4.7 and the notes on Appendix A4.6).**

## Appendix A4.3: Green Belt Purpose and Related Criteria, Points, Weights and Scores

This shows the scoring used for each purpose and related criteria, the points given and the weighting and ranking provided. (Highest ranking is highest multipliers)

Purpose	Criteria	Criteria definition	Points	
<b>I. Check unrestricted sprawl of large built-up areas</b>	a. Impedes ribbon development	=>5 houses	4	
		<5 houses	2	
		No development	0	
	b. Distance from Cheltenham built up area	0 -0.5km	5	
		0.5 – 2km	3	
>2km		1		
Weight = 3.33 Rank = 3				
<b>II. Prevent neighbouring towns merging</b>	a. Line of sight distance between one sub area's outer boundary and any other urban area's outer boundary (excluding Cheltenham)	<0.5 km	5	
		0.5 - 1km	4	
		1 - 1.5km	3	
		>1.5km	1	
		Weight = 6 Rank = 4		
<b>III. Assist in safeguarding the countryside from encroachment</b>	a. Nature conservation value	Yes - existence of designated land (statutory)	5	
		Yes - existence of designated land (non-statutory)	3	
		No designated land	1	
	b. Sites of high quality landscape character (per landscape assessment)	Yes	5	
		Yes, other designation	3	
		No	1	
	c. Trees	Yes - existence of ancient or other protected woodland, forests, trees, hedgerows	5	
		No	1	
		d. Agriculture	High quality (1 and 2)	5
			All other agriculture (Grade 3 and below)	1
<b>IV. Preserve setting and special character of historic towns</b>	a. Views of Cheltenham Town Centre	No view of Cheltenham's Town Centre	0	
		View of Cheltenham's Town Centre	5	
	b. Contribution to "Gateway"	Within 400m of A4, A4019, A46, A40	5	
		Adjoining A435 and B4632	3	
		Within 400m of A435 and B4632	2	
		Adjoining any other route into Cheltenham	1	
		All others	0	
		c. Conservation Area	Within conservation area	5
	Adjacent to conservation area		3	
	No conservation area		1	
Weight = 2 Rank = 1				

**APPENDIX A4.4**  
**Green Belt Sub Area Totals (Weighted, Unranked)**



**Appendix A4.4:  
Green Belt Sub Area Totals (Weighted, Unranked)**

Low		Average		High	
Sub Area	Score	Sub Area	Score	Sub Area	Score
G4	24	D14	37	A11	51
B1	29	A5	37	G12	51
D8	29	B2	37	G13	51
F4	29	F5	37	A4	51
F7	31	G7	37	A7	51
F10	31	G1	38	G5	51
G6	31	F2	39	D21	52
F6	33	A9	41	A10	53
G8	33	D17	41	E3	53
D19	36	E7	41	F14	53
		F3	41	G16	53
		A6	41	G19	53
		A3	42	E1	53
		E5	43	G9	53
		E6	43	A1	54
		D16	43	E2	54
		D18	43	F11	54
		D15	43	F15	54
		D20	44	G15	54
		E4	44	G18	55
		F8	44	B3	55
		F9	44	G3	59
		G17	45	D1	60
		F12	46	D3	60
		D4	46	D11	60
		D5	46	D12	60
		D2	47	D13	60
		D6	47	G14	61
		D7	47	G11	64
		D9	47		
		D10	47		
		F1	47		
		F13	47		
		A2	48		
		B4	49		
		G2	49		
		A8	50		
		D22	50		
		G10	50		

**APPENDIX A4.5:  
Green Belt Sub Area Totals (Weighted, Ranked)**

**APPENDIX A4.5:  
Green Belt Sub Area Totals (Weighted, Ranked)**

Low		Average		High	
Sub Area	Score	Sub Area	Score	Sub Area	Score
G4	68	A6	112	G5	158
B1	85	B4	112	A4	161
D8	85	F12	115	A7	161
F4	85	F1	118	G19	163
D19	86	F13	118	G16	164
F10	88	G1	118	G12	165
F7	88	D15	120	G13	165
G6	88	E5	125	G10	166
F6	90	E6	125	G3	166
G8	90	E4	128	A10	167
D20	94	F8	128	A1	170
F2	95	F9	128	G15	170
D21	96	D4	130	G18	173
A9	98	D5	130	G14	186
E7	98	E1	130	G11	202
F3	98	G9	130		
D14	100	B3	132		
D17	104	A11	133		
D18	106	A8	134		
D22	106	E3	135		
A5	108	F14	135		
B2	108	E2	138		
D16	106	F11	138		
F5	108	F15	138		
G7	108	G17	138		
D10	110	A3	140		
D2	110	G2	142		
D6	110	A2	146		
D7	110	D1	150		
D9	110	D11	150		
		D12	150		
		D13	150		
		D3	150		

**APPENDIX A4.6**  
**Cheltenham Green Belt Sub Area Scores by Purpose and Criteria**

### Appendix A4.6 Cheltenham Green Belt Sub Area Scores by Purpose and Criteria

(See also Figure C)

	Sub Area	PIa	PIb	PI Total	PIIa	PII Total	PIIIa	PIIIb	PIIIc	PIII d	PIII Total	PIVa	PIVb	PIVc	PIV Total	Unranked Total	Weighted Total	Ranked Total
<b>Zone A</b>	A1	0	3	3	5	5	1	1	1	1	4	0	3	1	4	16	54	170
	A2	0	3	3	4	4	1	1	1	1	4	0	3	1	4	15	48	146
	A3	0	3	3	4	4	1	1	1	1	4	0	0	1	1	12	42	140
	A4	0	5	5	4	4	1	1	1	0	3	0	2	1	3	15	51	161
	A5	2	5	7	1	1	1	1	1	1	4	0	0	1	1	13	37	108
	A6	2	5	7	1	1	1	1	1	1	4	0	0	3	3	15	41	112
	A7	0	5	5	4	4	1	1	1	0	3	0	2	1	3	15	51	161
	A8	4	5	9	1	1	1	1	1	1	4	0	3	1	4	18	50	134
	A9	0	5	5	1	1	1	1	1	1	4	0	3	3	6	16	41	98
	A10	0	3	3	5	5	1	1	1	0	3	0	3	1	4	15	53	167
	A11	4	5	9	1	1	1	1	1	0	3	0	2	3	5	18	51	133
<b>Zone B</b>	B1	0	5	5	1	1	1	1	1	0	3	0	0	1	1	10	29	85
	B2	2	5	7	1	1	1	1	1	1	4	0	0	1	1	13	37	108
	B3	2	5	7	1	1	1	5	1	1	8	5	1	1	7	23	55	132
	B4	0	5	5	1	1	1	5	1	1	8	5	1	1	7	21	49	112
<b>Zone D</b>	D1	4	5	9	1	1	1	1	1	5	8	0	5	1	6	24	60	150
	D2	0	5	5	1	1	1	1	1	5	8	0	5	1	6	20	47	110
	D3	4	5	9	1	1	1	1	1	5	8	0	5	1	6	24	60	150
	D4	4	5	9	1	1	1	1	1	1	4	0	1	1	2	16	46	130
	D5	4	5	9	1	1	1	1	1	1	4	0	1	1	2	16	46	130
	D6	0	5	5	1	1	1	5	1	1	8	5	0	1	6	20	47	110
	D7	0	5	5	1	1	1	5	1	1	8	5	0	1	6	20	47	110
	D8	0	5	5	1	1	1	1	1	0	3	0	0	1	1	10	29	85
	D9	0	5	5	1	1	1	5	1	1	8	5	0	1	6	20	47	110

**Cheltenham Green Belt Sub Area Scores by Purpose and Criteria (Continued)**

	D10	0	5	5	1	1	1	5	1	1	8	5	0	1	6	<b>20</b>	<b>47</b>	<b>110</b>
	D11	4	5	9	1	1	1	5	1	1	8	5	0	1	6	<b>24</b>	<b>60</b>	<b>150</b>
	D12	4	5	9	1	1	1	5	1	1	8	5	0	1	6	<b>24</b>	<b>60</b>	<b>150</b>
	D13	4	5	9	1	1	1	5	1	1	8	5	0	1	6	<b>24</b>	<b>60</b>	<b>150</b>
	D14	0	5	5	1	1	1	5	1	1	8	0	0	1	1	<b>15</b>	<b>37</b>	<b>100</b>
	D15	2	5	7	1	1	1	5	1	1	8	0	0	1	1	<b>17</b>	<b>43</b>	<b>120</b>
	D16	0	5	5	1	1	1	5	1	1	8	0	3	1	4	<b>18</b>	<b>43</b>	<b>106</b>
	D17	0	5	5	1	1	1	5	1	1	8	0	2	1	3	<b>17</b>	<b>41</b>	<b>104</b>
	D18	0	5	5	1	1	1	5	1	1	8	0	3	1	4	<b>18</b>	<b>43</b>	<b>106</b>
	D19	0	3	3	1	1	1	5	1	1	8	0	3	1	4	<b>16</b>	<b>36</b>	<b>86</b>
	D20	0	3	3	1	1	1	5	1	1	8	5	2	1	8	<b>20</b>	<b>44</b>	<b>94</b>
	D21	0	3	3	1	1	5	5	1	1	12	5	3	1	9	<b>25</b>	<b>52</b>	<b>108</b>
	D22	0	3	3	1	1	5	5	1	1	12	5	2	1	8	<b>24</b>	<b>50</b>	<b>106</b>
<b>Zone E</b>	E1	2	5	7	1	1	1	1	5	1	8	0	5	1	6	<b>22</b>	<b>53</b>	<b>130</b>
	E2	4	5	9	1	1	1	1	1	1	4	0	5	1	6	<b>20</b>	<b>54</b>	<b>138</b>
	E3	4	5	9	1	1	1	1	1	0	3	0	5	1	6	<b>19</b>	<b>53</b>	<b>135</b>
	E4	4	5	9	1	1	1	1	1	1	4	0	0	1	1	<b>15</b>	<b>44</b>	<b>128</b>
	E5	4	5	9	1	1	1	1	1	0	3	0	0	1	1	<b>14</b>	<b>43</b>	<b>125</b>
	E6	4	5	9	1	1	1	1	1	0	3	0	0	1	1	<b>14</b>	<b>43</b>	<b>125</b>
	E7	0	5	5	1	1	1	1	1	1	4	0	5	1	6	<b>16</b>	<b>41</b>	<b>98</b>
<b>Zone F</b>	F1	2	5	7	1	1	1	1	1	1	4	0	5	1	6	<b>18</b>	<b>47</b>	<b>118</b>
	F2	0	5	5	1	1	1	1	1	0	3	0	5	1	6	<b>15</b>	<b>39</b>	<b>95</b>
	F3	0	5	5	1	1	1	1	1	1	4	0	5	1	6	<b>16</b>	<b>41</b>	<b>98</b>
	F4	0	5	5	1	1	1	1	1	0	3	0	0	1	1	<b>10</b>	<b>29</b>	<b>85</b>
	F5	2	5	7	1	1	1	1	1	1	4	0	0	1	1	<b>13</b>	<b>37</b>	<b>108</b>
	F6	0	5	5	1	1	1	1	1	1	4	0	1	1	2	<b>12</b>	<b>33</b>	<b>90</b>
	F7	0	5	5	1	1	1	1	1	1	4	0	0	1	1	<b>11</b>	<b>31</b>	<b>88</b>

**Cheltenham Green Belt Sub Area Scores by Purpose and Criteria (Continued)**

	F8	4	5	9	1	1	1	1	1	1	4	0	0	1	1	15	44	128
	F9	4	5	9	1	1	1	1	1	1	4	0	0	1	1	15	44	128
	F10	0	5	5	1	1	1	1	1	1	4	0	0	1	1	11	31	88
	F11	4	5	9	1	1	1	1	1	1	4	0	5	1	6	20	54	138
	F12	2	5	7	1	1	1	1	1	0	3	0	5	1	6	17	46	115
	F13	2	5	7	1	1	1	1	1	1	4	0	5	1	6	18	47	118
	F14	4	5	9	1	1	1	1	1	0	3	0	5	1	6	19	53	135
	F15	4	5	9	1	1	1	1	1	1	4	0	5	1	6	20	54	138
Zone G	G1	0	3	3	3	3	1	1	1	1	4	0	1	1	2	12	38	118
	G2	0	5	5	3	3	1	1	1	1	4	0	1	3	4	16	49	142
	G3	2	5	7	3	3	1	1	1	1	4	0	1	5	6	20	59	166
	G4	0	3	3	1	1	1	1	1	1	4	0	0	1	1	9	24	68
	G5	2	5	7	3	3	1	1	1	1	4	0	1	1	2	16	51	158
	G6	0	5	5	1	1	1	1	1	1	4	0	0	1	1	11	31	88
	G7	2	5	7	1	1	1	1	1	1	4	0	0	1	1	13	37	108
	G8	0	5	5	1	1	1	1	1	1	4	0	1	1	2	12	33	90
	G9	2	5	7	1	1	1	1	1	5	8	0	5	1	6	22	53	130
	G10	0	3	3	5	5	1	1	1	1	4	0	1	1	2	14	50	166
	G11	4	5	9	4	4	1	1	1	1	4	0	1	1	2	19	64	202
	G12	0	3	3	5	5	1	1	1	0	3	0	2	1	3	14	51	165
	G13	0	3	3	5	5	1	1	1	0	3	0	2	1	3	14	51	165
	G14	2	5	7	4	4	1	1	1	1	4	0	3	1	4	19	61	186
	G15	0	3	3	5	5	1	1	1	1	4	0	3	1	4	16	54	170
	G16	0	5	5	4	4	1	1	1	1	4	0	2	1	3	16	53	164
	G17	0	5	5	3	3	1	1	1	1	4	0	1	1	2	14	45	138
	G18	4	5	9	3	3	1	1	1	0	3	0	0	1	1	16	55	173
	G19	0	5	5	4	4	1	1	1	0	3	0	3	1	4	16	53	163

## Explanatory Notes:

Appendix A4.6 describes the scoring results of each sub area identified in the Cheltenham Green Belt Study. For the purposes of this table, the sub areas are grouped according to their respective Zones as defined in the Sub–regional study. The PPG2 purposes, abbreviated with roman numerals I, II, III, and IV, for which they are scored against, are identified on the top row. It is important to remember that the fifth PPG2 purpose was not included in the scoring process as each sub area would equally contribute to this purpose (see paragraph 4.5.3). Section 4.5 describes how and why each purpose was defined by criteria to create a transparent scoring system by which to measure how each sub area fulfils the purposes of Green Belt as defined in PPG2. Each criterion is defined by the roman numeral and small-cased letter (further defined below). The actual scores each sub area received are entered into the grid corresponding to the sub area row and the purpose columns.

<sup>1</sup> Sub area: Sub area identified in Cheltenham Green Belt Study area.

<sup>2</sup> PIa: Check unrestricted sprawl of large built up area - Impedes ribbon development.

<sup>3</sup> PIb: Check unrestricted sprawl of large built up area - Distance from Cheltenham built up area.

<sup>4</sup> PI Total: Sum total of PI scores for unrestricted sprawl of large built up area.

<sup>5</sup> PIIa: Prevent neighbouring towns from merging - Distance from sub area's outer boundary to any other urban area's outer boundary (excluding Cheltenham).

<sup>6</sup> PII Total: Sum total of PII scores for prevention of neighbouring towns from merging.

<sup>7</sup> PIIIa: Assist in safeguarding the countryside from encroachment - Nature conservation value.

<sup>8</sup> PIIIb: Assist in safeguarding the countryside from encroachment - Sites of high quality landscape character.

<sup>9</sup> PIIIc: Assist in safeguarding the countryside from encroachment – Estimate of trees.

<sup>10</sup> PIIId: Assist in safeguarding the countryside from encroachment – Agriculture quality.

<sup>11</sup> PIII Total: Sum total of PIII scores for assisting in safeguarding the countryside from encroachment.

<sup>12</sup> PIVa: Preserve setting and special character of historic towns; Views of Cheltenham Town Centre.

<sup>13</sup> PIVb: Preserve setting and special character of historic towns; Contribution to “Gateway”.

<sup>14</sup> PIVc: Preserve setting and special character of historic towns; Conservation Area.

<sup>15</sup> PIV Total: Sum total of PIV scores for preservation of setting and special character of historic towns.

<sup>16</sup> Unranked Total: Sum of the individual purpose total scores (PI Total, PII Total, PIII Total, PIV Total) per sub area.

<sup>17</sup> Weighted Total: Each purpose total score multiplied by a ‘weight’ to ensure *equal representation* of each PPG2 purpose (P), (described in Section 4.6) and then added together.

<sup>18</sup> Ranked Total: Weighted total multiplied by a ‘rank’ to demonstrate the *perceived importance* of each PPG2 purpose (P), (described in Section 4.8).



**Appendix A7.1**  
**Stage One Consultation: General Consultation Letter**

15 November 2006

AERC Ref: SEGB/J8901

Dear

### **Cheltenham Green Belt Review**

As you may be aware, Cheltenham Borough Council has embarked on the preparation of its Local Development Framework (LDF), as required under the Planning and Compulsory Purchase Act 2004. As part of this process, the Council has commissioned ourselves as planning consultants to carry out a review of the Cheltenham Green Belt. This will form part of a portfolio of documents which will help to inform the evidence base which will underpin the LDF, particularly the Core Strategy.

In particular, we have been asked to undertake the following tasks:

- To assess the Green Belt in the context of the recent South West Regional Spatial Strategy Review and the Cheltenham and Gloucester Joint Study Area.
- To analyse the existing extent of the Cheltenham Green Belt and its purpose as designated in 1960 and 1981 and its purpose and relevance in the context of current planning policy.
- To identify the role and purpose of the Green Belt within the context of the draft South West Regional Spatial Strategy and the Strategic Green Belt Review.
- To develop a ranking process which will provide a transparent mechanism with which land can be assessed against the purposes of the Green Belt.
- To analyse physical restraints to sustainable development in the Green Belt.
- To analyse opportunities for sustainable development.
- To identify defensible Green Belt boundaries within the context of plan periods to 2016 and 2026, and possible criteria for Green Belt review beyond 2026.
- To assess the relevance and effectiveness of current Local Plan Green Belt policies.
- To engage in consultation with stakeholders and the general public, consistent with the Borough Council's Statement of Community Involvement.

The purpose of this communication is to inform you about the review, which will be completed by the end of January 2007, and to invite you to submit any initial observations which may help us in the early stages of our study. To assist you, a set of questions is appended to this letter. You may have already made your views known on this topic, but it would be useful if you could forward them to the postal or e-mail address shown at the bottom of the Appendix.

The consultation programme includes a meeting of key stakeholders – this will be held on Monday 4 December next and will be facilitated by Jed Griffiths of Griffiths Environmental Planning who is part of our team. The meeting will provide an opportunity to discuss the issues arising from this initial stage and our preliminary work.

Invitations to this meeting will be sent to those organisations and groups which have a direct interest in the Green Belt and the policy review. These include major landowners, relevant parish councils, Government agencies, statutory undertakers, as well as the major environmental organisations.

Towards the completion of the review, you will be given a further opportunity to engage with us and to discuss our findings before a final report is submitted to the Borough Council. This will provide an input next Spring to the Core Strategy and to the Borough Council's submissions to the Examination in Public into the South West Regional Spatial Strategy.

I do hope you will take these opportunities to contribute to the Green Belt Review. Should you require any further information, please visit the Borough Council web-site or contact my colleague Stephen Heading by telephone on 01376 572582 or by email at [s.heading@aerc.co.uk](mailto:s.heading@aerc.co.uk).

Yours sincerely  
For and on behalf of AERC

A handwritten signature in black ink, appearing to be 'Stephen Baker', written in a cursive style.

Stephen Baker  
Head of Planning and EIA.

**Appendix A7.2**  
**Stage One Consultation: General Consultation List**

## Appendix A7.2: Stage One Consultation: General Consultation List

Organisation name	Title	First name	Surname
Bangladeshi Association	Mr		Radman
Beechwood Shopping Centre	Mrs	M.	Horne
Benefits Agency	Ms	M.	Howells
Bromford Housing Association	Mr	T	Bowron
CABE	Mrs	S.	Mason
Campaign for Real Ale (Gloucestershire Branch)	Mr	T.	Aburrow
Central Networks	Mr	Kevin	Townsend
Charlton Kings 2000	Mr	A.	Warton
Cheltenham & County Cycling Club	Mr	J.	Marstrand
Cheltenham & District Allotment Holders Association	Mr	C. A.	Smith
Cheltenham & Districts Citizen Advice Bureau	Mr.	A.	Banfield
Cheltenham and Tewkesbury Primary Care Trust	Dr	Shona	Arora
Cheltenham Arts Council	Mr	Chris	Lammiman
Cheltenham Borough Homes	Mr.	P.	Davies
Cheltenham Community Projects	Mrs	S.	Salmon
Cheltenham Conservation Areas Advisory Panel	Mr.	G.	Mathers
Cheltenham Cycle Campaign	Mr	G.	Ricketts
Cheltenham Disability Forum	Mrs.	H.	James
Cheltenham Federation of Tenants, Leaseholders and Residents			
Cheltenham Film Studios	Mr	D.	Bill
Cheltenham Gym Club Action Committee	Mr	M.	Collett
Cheltenham Hospitality Association	Mr	Peter	Christensen
Cheltenham Housing Aid	Ms	M	Apperley
Cheltenham in Bloom	Cllr	C	Ryder
Cheltenham Ladies College	Mr	D.	Milne
Cheltenham Nature Conservancy Council	Ms	S.	Barrett
Cheltenham Pensioners Forum	Mr	L.	Mason
Cheltenham Sports Council	Mr	D.	Perry
Cheltenham Tree Group	Miss	Cherry	Lavell
Cheltenham Young People's Council	Ms	V.	Patton
Coberley Parish Council	Ms	K	Bedford
Consignia Property Holdings	Mr	L. D.	Simmons
Cotswold District Council	Mr	C	Vickery
Cotwolds & Vale Primary Care Trust	Mr	R.	James
Countywide Substance Misuse Service	Mr	M	Folly
CPG Residents' Association	Mrs	D.	Evans
Crime and Disorder Partnership	Mr	T.	Gladding
Cycle Cheltenham	Mr	John	Mallows
Cyclists' Touring Club (Right to Ride Network)	Mr	G.	Howard
Defence Estates	Mr	Jeremy	Aston
Department of Health - Head of Property	Mr	David	Gubb
Dowdeswell Parish Council	Mrs	S	Jeans
Elm Farm Tenants and Residents Association	Mr	R.	Jarvis
English Nature	Mr	P.	Hackman
Everyman Theatre	Mr.	P.	Bernays
Federation of Small Businesses			Policy Officer
First Great Western Trains	Mr	D.	Mathieson

<b>Organisation name</b>	<b>Title</b>	<b>First name</b>	<b>Surname</b>
Food and Rural Affairs Team, Government Office for the South West	Miss	H.	McBeth
Forest of Dean District Council	Mr	N.	Gibbons
Forestry Commission	Mr	Wayne	Barnes
Freight Transport Association	Mr	I.	Gallagher
Friends of Montpellier Bandstand and Garden	Dr	Brian	Bracegirdle
Gay & Lesbian Helpline Gloucestershire		Lisa	Allane
Global Security Ltd	Mr	J.	Griffin
Gloscat	Mr	G.	Smith
Gloucester City Council	Mr	M.	Thorpe
Gloucestershire Ambulance Service NHS Trust	Mr	Karl	Henderson
Gloucestershire Business Link	Mr	T.	Sharpe
Gloucestershire Churches Together	Revd.	Alison	Evans
Gloucestershire Constabulary	C. I.	S	Radcliffe
Gloucestershire Constabulary	Mr	D.	Harrison
Gloucestershire County Association for the Blind	Mr	Marcus	Green
Gloucestershire County Council	Mrs	Angela	Newey
Gloucestershire County Council	Mrs	S. M.	Hamilton-Foyn
Gloucestershire Disability Forum	Ms	S.	McClung
Gloucestershire Echo	Ms	A.	Syvert
Gloucestershire Environmental Business Forum	Mr	T.	Sharpe
Gloucestershire Federation of Womens Institutes		Gill	Thomas
Gloucestershire FWAG	Ms	M.	Chapman
Gloucestershire Geology Trust	Mr	D.	Owen
Gloucestershire Green Business Club	Mr	A.	Steele
Gloucestershire Hospitals NHS Foundation Trust	Mr	G.	Marsh
Gloucestershire Housing Association	Ms	A.	Barnes
Gloucestershire Neighbourhood Projects Network	Ms	E	Marriott
Gloucestershire Partnership NHS Trust	Mr	D.	Coombs
Gloucestershire Partnership NHS Trust		Judith	Morris
Gloucestershire Waste Action Trust	Ms	A.	Kennedy
Hatherly Parks Residents' Association	Mr	C	Langdon
Heart of England Tourist Board	Ms	P.	Hadland
Lawrence Close Nature Reserve Trust	Mr	D. J.	Mason
Learning and Skills Council		Pauline	Bailey
LEGLAG - Secretary	Mrs	Margaret	White
Merestones Residents Association	Mr.	G.	Locke
Minority Ethnic Forum	Mr	G.	Varnav
Mobile Operators Association		Davies	Nicola
Muslim Association	Mr		Kapadia
National Council for Women	Mrs	Faith	Lockwood
National Playing Fields Association	Mr	R	Cole
Network Rail	Mr.	Nigel	Judge
NFU South West Region	Ms	Melanie	Hall
Orange Personal Communications Services Ltd.	Mr	S.	Rackham
PARC	Mr	M.	Boothman
Pittville Area Residents' Association	Mrs	J.	Plumb
Rail Passengers Council	Mr	M.	Greedy
Railfuture Midlands	Mr	A.	Bevan
Regen South West		Cheryl	Hiles

<b>Organisation name</b>	<b>Title</b>	<b>First name</b>	<b>Surname</b>
Regent Arcade Shopping Centre	Ms	M.	Tribel
RTPI South West Region		Helen	Clarke
Sevenhampton Parish Council	Mrs	A	Van Rossem
Severn Wye Energy Agency	Mr	G.	Ayling
SHA Estates - South West	Mr	Mike	Taylor
SMILE	Ms	S.	Skinner
South West Regional Assembly	Mrs	B.	Houlden
South West Tourism	Mr.	C.	Boston
Sport England	Mr	M	Drennan
Stagecoach West	Mr	I	Manning
Stratford Rail Transport Group	Mr	D.	Goodman
Stroud District Council	Mr.	P.	Gilbert
Tewkesbury Borough Council		Lisa	Belfield
The British Wind Energy Association	Mrs	K.	Adderley
The Countryside Agency	Ms	Alison	Rood
The Crown Estate	Mr	Andrew	Nutt
The Gloucestershire Newspapers Co. Ltd	Mr	P.	Inman
The Lanes Residents Association	Mr	P.	Wilson
The Leaseholders Forum	Mr	R.	Griffin
The Railway Development Society		F. J.	Hastilow
Tidy Cheltenham Group	Mr	E.	Huber
UCAS	Mr	A.	McClaran
University of Gloucestershire	Mr	David	Booth
University of Gloucestershire	Mr	Mike	Farmer
Virgin Trains	Ms	S.	Eaves
Vision 21	Ms	N.	Smykatz-Kloss
West Gloucestershire Primary Care Trust	Mr	S.	Golledge
Whittington Parish Council	Mr	R T	Owen
Young People's Council	Miss	Kim	Gibbon

**Appendix A7.3**  
**Stage One Consultation: List of General Consultation Respondents**



### **Appendix A7.3: Stage One Consultation: List of General Consultation Respondents**

1. Cotswold DC (Chris Vickery, Forward Planning Manager)
2. Campaign to Protect Rural England Cheltenham & Tewkesbury District (Dr David Beard)
3. SOUTH WEST REGIONAL DEVELOPMENT AGENCY (Alice Ordidge) this via email)
4. Gloucestershire Echo – list of issues by e-mail
5. The Crown Estate – Observations to follow (not received)
6. Ruth Clare – Planning Liaison Officer, Environment Agency.
7. Ken Pollock, Leckhampton Green Land Action Group.
8. Frank Jeffreys, Fielders Green Lodge
9. Government Office for the South West
10. A. Heckstall-Smith – Residents of Leckhampton
11. Mr James Hartley representing Galliard Homes Ltd
12. Mr Ian Marshall
13. Jacky and Gerry Potter
14. Stephen Holley, Clerk of Swindon Parish Council – No comments but would like notes from the Stakeholder Event that they missed.
15. Tony Briscombe (resident of Brizen Lane).
16. Cyril G. Richardson
17. James Hartley, Hunter Page Planning Ltd
18. Anne Davis – Leckhampton Green Land Action Group Comments – Appendix of Planning Decisions
19. Dan Wilson – Chairman, Leglag
20. Ken Pollock – Additional document with his latest observations.
21. Martin Horwood – Lib Dem MP for Cheltenham.
22. Ian Bickerton (on behalf of LLR)
23. Councillor Ceri Jones
24. Councillor Klara Sudbury
25. Thomas and Louise Bence

26. Margaret White
27. Miss H.J. Saxby
28. Owen Jones – Boyer Planning
29. Councillor Robin MacDonald
30. B.J. Simon on behalf of The Swindon Village Society

**Received after cut-off date of 18 December 2006**

31. Parish Council of Leckhampton with Warden Hill.
32. Ann Green, Chief Superintendent, C&T Divisional Commander.
33. Jamie Lewis, Hunter Page Planning (on behalf of Redrow Homes)
34. Cherry Lavell, Tree Warden, Cheltenham Tree Group.
35. Colin Spencer.
36. A. Miller.
37. Stephanie Howard, Bruton Knowles representing Mrs M J Griffiths.
38. JR Fraser-Holland – Friends of Leckhampton Hill.
39. David Scott, DMS Consulting re: Land at the Briars.
40. Jacky and Gerry Potter.
41. Ian Bickerton.

**Appendix A7.4**  
**Stage Two Consultation: List of Stakeholder Workshop Invitees**

**Appendix A7.4: Stage Two Consultation: List of Stakeholder Workshop Invitees**

Gideon Darly	Mrs Moors Scott	Mr and Mrs Few
Robin MacDonald	Councillor Jones	Don Wilson
Lesley Bexon	Keith Hallin	Simon Perkins
Joyce Williams	Shaun Parsons	Mrs T. Averies
Derek Bogle	R.W. Harris	Mr and Mrs Dingle
Cyril Richardson	Mr C.C. and Mrs J. Ringrose	David Jones
Irene and Douglas Jones	Trevor Colbeck	Mark Slater
Gerry Potter	Sheila Chaplin	M. Calway
Lynn Morris	Susan Plimmer	Councillor Ken Buckland
Martin Chandler	Hilary Beale	Mrs C. Carline
Les Godwin	W.J. Wratten	Jo Tetlow
Paul McGuire	Alan Eccles	Robin Shepherd
Jenny Allen	Guy Woodcock	Sara Watson
Simon Pontiflex	David and Christine	Liz Ward
Karen Radford	Saunders	Mr Moleno
Hugh Evans	Alan Wilkins	Ann Davis
Wilf Tomaney	Kirsty O’Nion	John Grover
Derek Harrison B’Arch	James Lee	Councillor Williams
Luke Craddy	Martin Quantock	Christine Botting
Jim Scott	Jamie Lewis	Carol Rabette
Paul Baker	Guy Wakefield	Margaret White
Megan Rainey	Ron Allen	Nick Tucker Brown
Jacky Fletcher	Johb Howard	Kirsty Powell
Klara Sudbury	J.R. Lee	Barry Simon
Chairman Sheppard	Mr and Mrs Beesley	Peter Bowman
Sarah Hamilton-Foyn	N.E. and P.H. Arnold	Richard Tibbles
Rebecca Foulds	Valerie Hodges	Sally Powell
Ronald Brickwen	Mr Grimdel	Ian Ferguson
John Hopwood	Jason Hill	Councillor Rob Garnham
Gerry Gearing	Martin Kanrenther	Melanie Day
Ken Herbert	Nick Upton	Heather Barrett
Tony Briscoombe	Micahel Dower	Mrs Julia Spencer
Meena Patel	Brian Lickman	R.W. Townsend
Mr D. Paine	Ken Herbett	Councillor Mike Beresford
Mr and Mrs Tony Meredith	Robert Vines	Andrew Sullivan
Ian Statham	Annabel Burton	Chris Shaw
Allan Nichols	Mrs Julia Van Gils	Ken Priest
Pam Gay	Joan Oats	Mike Griffin
R.G. and B.M. Carlton	Paul Johnson	Stuart Cricket
Cherry Lavell	R.S. boughton	Councillor Whelan
Frank Cannings	David Lawrence	Norman Scott and wife
Cori Pim-Keisle	Robert Bateman	Tony Davy
Clive Harmson	Councillor Tony Mackinnon	Neil Mantell
Mrs Frances Williams	Christine Botting	Mr and Mrs D. Mackenzie
Paul Davies	David Bayne	Claire Brimm
Councillor Barnes	Kit Brauhnoltz	Irene Uzzell
Councillor Reed	Kevin Daws	Paul Barnes
Councillor Jones	Mrs Mills	Aylwin Sampson
P.H. Coulthers	Anne Wett	K.F. Young
Pat Richards	Mark Newey	Nicola Dyer
Claire Stetson		Joyce Williams
		Pat Thornton

### List of Stakeholder Workshop Invitees (continued)

Robert Wilson  
Dorothy Lamacraft  
D. Whiting and wife  
Michael Cauttell  
Juliet Watkins  
Mary Nelson  
T.H. Unwin  
B.J. Unwin  
Anthea Gupta  
Michael Wilson  
Penny Hall  
Mr and Mrs Bickerton  
Gerald Kilby  
Adrian Mears  
Ben Cook  
David Price  
John Hamey  
A. Miller  
E. Kemp  
Andy Williams  
Phyllis Winter  
Paul Ryder  
Julie Myers  
Alan Nicholson  
Audrey Stevens  
Simon McMillan  
Peter Thorpe  
Lucy Heath  
Janet Cogher  
Joe Halton  
County Councillor Sudbury  
Matt Walker  
Robert Jones  
Lydia Bishop  
Richard Jarvis  
Rebecca Dobson  
P.G. Newcombe  
Charles Walsh  
Chris Enderby  
Lydia Bishop  
Richard Jarvis  
Colin Jones  
P. Walker  
Mr Geoffeys  
John, Adam and Tony Coultier  
Mr Melley  
Peter Richmond  
Tony McNamara  
Kevin Homes  
Councillor Stennett  
Councillor Harvey  
Councillor Jones  
Councillor Fuller  
Adrian Bridges

**APPENDIX A7.5:**  
**Stage Three Consultation: Notes of Public Forum: 10<sup>th</sup> January 2007**  
**(Notes taken by Cheltenham Borough Council)**

## **APPENDIX A7.5: Stage 3 Consultation: Notes of Public Forum: 10<sup>th</sup> January 2007**

### ***Introduction***

The meeting began with an introduction from Tracey Crews, strategic land use manager of Cheltenham Borough Council as to why Cheltenham needs a review of its Green Belt. A brief history of the Green Belt was touched upon and it was explained that the Green Belt can be used as a planning tool.

The long term needs of Cheltenham would have to be considered when taking a fresh look at the Green Belt.

Cheltenham will grow and change will have to take place – 12,500 new dwellings and 10,750 new jobs will be required. Cheltenham has been listed as 1 of 21 strategic areas for growth.

In 2004 the planning system changed. In the future all growth within Cheltenham will be in the context of the Regional Spatial Strategy (RSS). The RSS provides the framework for future planning changes within Cheltenham.

Any new plans put forward will have to have a strong evidence base to back them up and will be thoroughly examined.

The Local Development Framework (LDF) will be the first document to prepare in the Community Strategy. This document will identify broad locations for growth but does not allocate specific sites for development.

Steve Baker and Jed Griffiths, representatives of AERC, the consultancy firm that carried out the Green Belt review introduced themselves to the audience.

Steve Baker explained the AERC approach to the Green Belt review outlining its objectives and output, the independent nature of the study and its transparency, how the study is relevant to the RSS and government policies and the background to the study. The audience were reminded that the findings from the Green Belt review can be challenged via consultation which will be undertaken during 2007 on the LDF core strategy.

### ***The Green Belt Study***

#### *Scope of the Study*

Steve Baker defined the scope of the study. The review looked at the contribution of Green Belt land to Cheltenham and an examination of Green Belt boundaries.

The study also looked in detail of land surrounding Cheltenham's Green Belt and Areas of Outstanding Natural Beauty (AONB).

The wider study area mainly looked at areas of Tewksbury, including Bishops Cleeve to the north, the M5 in the west and the A436 south of the borough.

The methodology used was designed to:

1. Establish the context of the study;
2. Establish the role of the Green Belt;
3. Rank and analyse the Green Belt; and
4. Examine the Green Belt boundaries.

Outputs included:

1. Analysis of Green Belt policy;
2. Scoring of areas;
3. Identification of constraints and opportunities;
4. Potential Green Belt amendments;
5. Long term vision of Green Belt boundaries; and
6. The findings of the final report would be inputted into the Community Strategy.

## **Consultation**

Jed Griffiths outlined the consultation process of the Green Belt review, this included;

1. Meetings were held with the South West Regional Assembly and Tewkesbury Borough Council, Gloucester City Council and Gloucestershire County Council;
2. A letter was sent out seeking the views of the public. In total 200 letters were despatched and 34 replies were returned. This equated to a 17% response rate;
3. A full day workshops was held with stakeholders;
4. A workshop for councillors of Cheltenham, Tewkesbury, Gloucester City and Gloucestershire County Council was held; and
5. A public forum to outline the Green Belt review findings and elicit feedback.

### *Initial Findings from the study*

Steve Baker outlined the findings from the study process.

Cheltenham's Green Belt is very small and this is the context in which the study was undertaken.

Existing policies were looked at and were considered to be relevant and consistent with government policies and the draft RSS.

However, AERC were able to identify two weaknesses. PPG2 did not mention sustainability and the Green Belt settlements criteria needs to be re-examined.

It was suggested that the race course should be included within the Green Belt.

The study area was broken down into sub areas. These were described as the building blocks for the study. Each area was scored and those areas that scored the lowest were to the west, north and north west of the town.

Sub areas were divided into three groups based on the points they accumulated.

The inner edge of the Green Belt, AONB and unallocated land adjoining the Green Belt did not figure in the highest third. This land could not be used as compensation land as it doesn't score highly. Compensation land would have to come from outside Cheltenham, possibly Tewksbury.

The lowest scoring areas included the Fiddlers Green area, North West of Swindon Village and areas around Prestbury.

Steve Baker emphasised the transparency of the review and that in the final report all the data from the study will be set out together with how the scores were reached.



### *Constraints to Development*

Three types of hard constraints to development were identified. These were flood risk zones, AONB and the development exclusion zones around the sewage treatment works.

These areas were plotted for Cheltenham and the adjoining areas. Everywhere to the east is AONB and development exclusion zones exist to the west (edge of Fiddlers Green) and a small area at the northern boundary. These areas affect quite a lot of Green Belt and the adjoining areas.

### *Sustainable Development Opportunities and Constraints*

Sustainability criteria for development opportunities would include sub areas that had at least two or more facilities, making them appropriate locations and 'brownfield' sites.

A plan of this will feature in the final report on the Green Belt. Areas in the west and north west of Cheltenham have combinations of sustainability criteria.

Steve explained that the other major element of work was to examine the Green Belt boundaries. Most of the current Green Belt boundary is defensible. Fairly strong boundaries exist at the northern edge of Cheltenham and one or two areas to the west and south. These boundaries have been in existence for some time. However, other Green Belt boundaries were difficult to define as there was difficulty linking them up.

Any changes to the Green Belt will have to be master planned this will enable defensible boundaries can be created. This could be achieved through road construction and design, structural planting to define the urban edge of Cheltenham and good urban element design.

In the long term there may be defined boundaries beyond Cheltenham but these would have to be agreed in collaboration with other authorities.

### *Conclusions*

Changes to the North West will be carried out via joint working with Tewkesbury.

Boundaries beyond the year 2020 cannot be defined. A review after 2020 will have to be carried out to look at the Green Belt beyond 2026.

Findings of the review will be published; this will be made available via the Council's website

A draft report on the Green Belt is currently being finalised.

Feedback from this forum, together with any additional comments submitted via letter or email will be considered before the final report is draft and presented to the Council.

### *Question and Answer session*

Paul Ryder – Leckhampton and Warden Hill Parish Council:

#### **What influence would the South West Regional Spatial Strategy have on the Green Belt review?**

Tracey Crews – A strategic review of the Green Belt has been undertaken to inform the Regional Spatial Strategy. The review currently being undertaken by AERC is being prepared within the work already undertaken. The Green Belt review is a piece of evidence that is independent and is open for debate. The final version will be submitted as evidence to the examination in public to the Regional Spatial Strategy

County Councillor MacDonald:

#### **Sort clarification concerning the landscape assessment, whether it had been part of the study.**

Steve Baker – Landscape has a part to play in the Green Belt, in that it contributes to the Green Belt but is not the driving force of Green Belt policy.

John Oates – Pittville Residents Association:

#### **Are other authorities undertaking the same study?**

Tracey Crews – The council did investigate joint working with Tewkesbury Council. However Cheltenham has been under significant pressure to deliver parts of the LDF by the Government Office of the South West (GOSW). The review therefore needed to be conducted as soon as possible.

Duncan Smith – All local authorities will have to address Green Belt issues within the LDF. The work that Cheltenham has had carried out may help other authorities with their work.

Steve Baker – No other local authority has carried out this work. Cheltenham is at the forefront of Green Belt policy. All authorities in the country are playing catch up with Cheltenham.

Councillor Godwin:

#### **For a policy to succeed it has to have the confidence of the people of Cheltenham. Up Hatherley and Swindon Village have had land taken out of the Green Belt. How can we have confidence?**

Duncan Smith – planning committees will assist in developing this confidence.

Tracey Crews – We should be looking at how to keep Cheltenham special. There has already been a lot of development on brown field sites and these sites are diminishing. We have to think creatively and the RSS has set the gauntlet to do this. The government Inspector has already stated that employment land cannot wait – we need to look at sites which may be ‘greenfield’ sites. We have to look creatively at peripheral sites in considering the capacity of Cheltenham. We are living longer and in smaller family units – this is the challenge. To achieve all this, the Green Belt needs to be relevant in the long term, communities need certainty. By undertaking a transparent Green Belt review, and thorough public consultation we hope to gain the support of communities. We need a strong position to defend at a future examination.

Duncan Smith – the Green Belt review can help us defend against regional and national policies.

Tracey Crews – We can create a degree of permanence with the Green Belt. It is desirable to have agreement between the council and the public as to how these boundaries are defined.

Councillor Melrose:

**Sort clarification and recommendations on the Race course.**

Steve Baker – the race course has a fundamental importance to the Green Belt. Built up areas are linked to the race course, which are in turn linked to the surrounding areas. It is an integral part of the Green Belt. The planning policy needs to be set in Green Belt. Policies that allow the race course to evolve should not be treated separately to the Green Belt.

Peter Bowman:

**Questioned the hierarchy that governs planning decisions. How many people do we have to defend against?**

Jed Griffiths – The planning inspectorate examines LDF's and their soundness. It is important for the Green Belt to have very sound evidence based policies that are supported by the public and in which the public have confidence in.

Kerry Jones – Councillor Bishops Cleeve:

**The RSS proposes to extend the Green Belt to the north and west of Bishop's Cleeve. The concern is that Green Belt will be lost through creeping development in the north of Cheltenham.**

Duncan Smith – North west of Bishops Cleeve is compensatory Green Belt.

Jed Griffiths – The gap beyond Bishops Cleeve is outside the scope of the study. Tewksbury Borough Council is aware of this.

Duncan Smith – Tewksbury will need to carry out this work.

Robin Shepperd – CGMS Planning Consultancy:

**One of the weaknesses of the Green Belt is sustainable development. What weight is attached to sustainable development verses the Green Belt – which will carry greater weight?**

Tracey Crews – Sustainable development has to be at the core of planning policies. If it is not the government Inspector may say policies have been based on unsound judgement. Public consultation will take place on a range of issues and options on where development should be located.

Rick Jarvis – Tenants and Residents Association:

**If Green Belt boundaries were shifted outwards into the countryside the purpose of the Green Belt would be lost. Sustainable development criteria referred to in this view is lacking.**

Steve Baker – One feature of the Green Belt is its permanence - there are a number of elements to this. Cheltenham needs to meet requirements for development; however this is at odds with the permanence of the Green Belt boundary – need to recognise that it is society that is generating this development requirement. The Green Belt should encourage regeneration, keep settlements separate, prevent urban sprawl, protect countryside character and to protect the setting of historic towns. Green Belt designation criteria for sustainable development should be identified in terms of good practice; any review should be based on the principle that sustainable development will be reached.

The Green Belt review provides an objective, independent and logical analysis. It is up to Cheltenham to decide what it does with the findings.

Rebecca Foulds – Foxley Town Planning:

**Asked AERC to clarify the findings on Leckhampton unallocated land – applying Green Belt policies to it although it is not Green Belt.**

Steve Baker – The same criteria was used. None of the land scored highly against Green Belt purposes.

Adrian Bridges:

**Did you go out on foot and to look at the sites?**

Steve Baker – Site visits consisted of three stages. There was an initial familiarisation with the areas and initial exercises were desk bound. The methodology was tested on the ground and all sub areas and boundaries were seen. Various areas were visited on three occasions.

Ian Ferguson – Trustees of Battledown Estate:

**When might we expect development to take place? If it was to start in 2015, completion would probably be 2020. Another review would be required then and it would be difficult to measure the effectiveness of the policies.**

Tracey Crews – Cannot provide an answer to this. There will be a public examination this year on the RSS. The Community Strategy needs to be prepared in the context of the RSS. Urban capacity work will be continuing. In Spring Cheltenham will hold public consultations, in the summer plans will go on deposit at which time there will be further public consultation.

If the public have any issues they should consult the council's website for information or email planning staff. AERC can be contacted directly.

Other Contributor:

**With more employment land Cheltenham will attract people from other places. How low does productive farmland rate with employment land?**

Tracey Crews – We have to create a balance between jobs and housing, this has already been taken into account via the RSS. Infrastructure is important and careful master planning will be an essential tool in planning the urban form.

Steve Baker – When looking at agricultural land we had to decide if the land assisted in safeguarding the countryside. And this is yes, it does.

Ronald Brickwell – Prestbury Parish Council:

**Disappointed in comments regarding Leckhampton. Green Belt status should have been recommended to the unallocated land south of Cheltenham (Leckhampton).**

Steve Baker – Leckhampton would not feature as Green Belt land as it does not score highly. Remit of the study is to look objectively – this is what we have done.

Irene Jones:

**Warden Hill was established in the late 1950s, early 1960s – people probably objected to this development then as they are doing to development in the Green Belt now. We need new houses. Will new housing consist of starter homes and housing authority rented homes?**

Duncan Smith – The RSS is looking at 40% for affordable housing, rented and mixed tenure.

Kit Braunzholtz – LEGLAG:

**Land close to Leckhampton Hill has landscape, geological, botanical and recreational value and should be given special consideration. Gloucestershire has developed way out from where it used to be since the Green Belt was established. Suggested defensible boundaries could include Shurdington, Church Lane and Moored stream. Quite a lot of the land belongs to the county council – is this why it was not included as Green Belt originally? Three inspectors have recommended that this land should not be developed.**

Duncan Smith – There is no suggestion that land should be developed.

Jamie Lewis – Hunter Page Planning:

**Welcomed commitment to review the Green Belt, however given that the local plan Inspector recommended land being taken out of the Green Belt which was not supported by the Council what level of support will there be by the Council on the findings of the review?**

Tracey Crews – This will be looked at in the most transparent way. The findings of the review will inform the LDF core strategy; this will be subject to public consultation. Members have a role to play in making decisions and the public will have opportunities to question these decisions.

Duncan Smith – Evidence gathering is important.

Nick Tucker Brown:

**Will plans and information about scoring be made available on the council website? Have consultants walked the Honeybourne Line?**

Tracey Crews – Notes taken at this meeting along with the presentation and maps will be placed on the council website. The full report will be available on the website once the review has been finalised.

Jed Griffiths – Agreed to walk the Honeybourne Line

The public forum came to a close at 6.00pm.

## FIGURES

**Figure A:  
Cheltenham Green Belt Study Area**



**Figure B:  
Cheltenham Green Belt Sub Areas**

**Figure C:  
Ranked Scoring of Areas against Green Belt Purposes**

**Figure D:  
Hard Constraints to Development**

**Figure E:  
Sustainable Development Opportunities and Patterns**

**Figure F:  
Green Belt Boundaries**

**Figure G:  
Combined Analysis**