



Assessment of land availability

2014 - 2015

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Please note that the assessment of land availability is a technical assessment to inform strategic planning. The inclusion or omission of a site, development type or development timescale should not be used to infer that planning permission would or would not be granted.

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1. Introduction

1.1 This assessment of land availability provides a snapshot of development potential in Cheltenham Borough in January 2016. The assessment has been carried out in accordance with the government's National Planning Practice Guidance¹:

An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the Strategic Housing Land Availability Assessment requirement as set out in the National Planning Policy Framework.

It is an important step in the preparation of Local Plans. The National Planning Policy Framework identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate.

1.2 In order to meet current planning requirements the study has also been carried out in accordance with the National Planning Policy Framework.

1.3 The assessment is part of the evidence base informing the Local Plan for Cheltenham. This will comprise the Joint Core Strategy (JCS) for Gloucester, Cheltenham and Tewkesbury, and the Cheltenham Plan. More information can be found online at www.cheltenham.gov.uk/planningpolicy.

1.4 The assessment will provide the basis for further work on Cheltenham's non-strategic site allocations contained in the Cheltenham Plan, following the regulation 18 consultation which took place during the summer of 2015 (see www.cheltenham.gov.uk/localplan).

1.5 The assessment is an important piece of evidence for the preparation of a housing trajectory and five year supply of specific deliverable sites as required by NPPF paragraph 47. These will be published separately.

1.6 Please note that in order to take account of the emerging plan; the methodology employs certain assumptions relating to the JCS evidence base and proposed Green Belt revisions.

1.7 Cheltenham Borough has worked with all Gloucestershire districts on an agreed methodology for site assessment. Dialogue is ongoing and further amendments/refinements may be made to the methodology in future versions of this report.

1.8 This assessment is not subject to a statutory consultation period, comments may be submitted to the Council. Information and evidence received will be used to inform future assessments. Should you wish to submit comments or supply evidence to support a site's position please contact:

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/assessment-of-land-availability/what-is-the-purpose-of-the-assessment-of-land-availability/>

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2. Methodology

Assessment process

- 2.1 The methodology in this section relates primarily to Stage 1 and Stage 2 of the assessment process described in the National Planning Practice Guidance. Stage 1 is the identification of sites and stage 2 is the assessment of sites. Stages 3, 4 and 5 are covered by section 3 of this report.
- 2.2 Cheltenham Borough Council conducted a 'call for sites' between 8th December 2015 and 4th January 2016, which was publicised on the Council's website and site promoters were contacted in order to obtain updates on proposals and delivery timescales. The call for sites resulted in four new site submissions and a number of updates to sites previously submitted.
- 2.3 Furthermore, during the last consultation on the Cheltenham Plan a number of representations identified sites which had not previously been assessed. Eight sites were identified through the consultation; therefore these sites have been included within this assessment.
- 2.4 In addition to the call for sites, officers collected up-to-date local information and an extensive desk-based review was carried out to update the work of previous years which included site surveys.
- 2.5 Once all information had been collated it was shared with a Site Assessment Panel comprising of local agents, representatives of the development industry and local specific consultees. The terms of reference for the Panel are provided in Appendix 1 of this report. A Panel meeting was held at Gloucester City Council Offices on 6th January 2016 where the purpose was to obtain information on the deliverability of sites.
- 2.6 Following the Panel, comments received were reviewed and additional enquiries were made to establish the deliverability and development timescales for specific sites. The final results of the site assessments are provided in Tables 1 – 4 of this report.
- 2.7 The Assessment, in accordance with the methodology, only includes sites which could deliver 5 or more dwellings or cover at least 0.2ha. This is to remove any risk of double counting within the windfall allowance, see Windfalls within the methodology and Table 8.
- 2.8 The JCS strategic sites incorporate all other submitted sites contained within their boundary. In the 2013 SALA individual sites within Leckhampton were assessed, for consistency in approach with North West Cheltenham. In 2014 the SALA merged all sites within the strategic allocations together, arguing that the actual developable area and form of strategic allocation is defined by the Submission JCS and will be determined through the development management process (for a list of sites see Table 1). However, having received advice from the panel, the individual sites have been assessed as part of this year's assessment for the Strategic Allocation South Cheltenham. The panel argued that due to on-going considerations within the JCS Examination in Public it was felt this approach would be appropriate.

2.9 To inform Cheltenham’s housing trajectory and five year supply of deliverable sites it is necessary to collect information on developments that have already received approval as well as the potential development sites described above. Tables 5 – 7 therefore provide a list of:

- sites that have received planning consent for housing;
- sites with a Council resolution to grant consent subject to completion of a Section 106 legal agreement; and
- sites that have received approval for conversion of offices to residential use under permitted development rights.

2.10 The housing trajectory and five year supply will also include an allowance for ‘windfalls’, i.e. sites that haven’t been specifically identified and become available unexpectedly. In Cheltenham, windfalls have historically been an important source of new housing delivery, particularly on smaller sites and through conversions and subdivisions. The JCS authorities have developed a NPPF compliant windfall approach that is summarised in the methodology table below. To inform that work, a record of housing completions on small sites (1-4 dwellings) is provided in Table 8 of this report.

JCS authorities’ joint methodology

2.11 During 2013 the JCS authorities developed a joint methodology covering the main parameters involved in the assessment of land availability. This approach was shared with two Site Assessment Panels and updated to reflect feedback from the panel. Furthermore, in light of new evidence being available regarding the Cotswold Area of Outstanding Natural Beauty the methodology has been further updated so this work may be taken into account on relevant sites.

2.12 The shared methodology is provided below and includes:

- the approach for identifying sites
- criteria for assessing whether a site is suitable, available and achievable for housing or economic development and other uses
- the approach to assessing site capacity
- the general approach to community involvement
- criteria for establishing the delivery timescale or phasing of sites
- an indication of the approach to windfalls to be used for work on housing trajectories and the five year supply

Supply component	Approach
<i>Assessment sites from a range of sources:</i> (Nb: From 2013 onwards sites that could deliver 5 or more dwellings or covering 0.2ha are included in the assessment)	Existing/draft/emerging development plan site allocations Submitted sites Officer-identified sites Assessment sites from previous years SALA/SHLAA/SELAA studies Expired planning permissions yielding 5 or more units from 2011/12 monitoring period onwards
Planning consents	All extant planning consents for residential use are included in the assessment as potential housing sites
Criteria	
Suitability	A site is considered suitable if it offers a suitable location for development and would contribute to the creation of sustainable,

	<p>mixed communities. The assessment focuses on the existence of physical and environmental constraints, based on available evidence. To reflect the fact that development plans are being reviewed, existing Local Plan policies which restrict the use of a site or area are not, in general, employed at this stage of the assessment. The key exceptions to this approach are designated Green Belt areas and the Cotswold Area of Outstanding Natural Beauty (AONB). The approach to sites in these areas is also set out below.</p> <p>Assessment of the suitability of a site for development is also informed by local evidence including the existence of any relevant pre-application discussions, planning applications, Development Briefs, Supplementary Planning Documents etc. and evidence gathered from site assessment panels.</p>
Availability	<p>A site is considered available for development where there is confidence that there are no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners, the land is controlled by a developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.</p> <p>Where such constraints exist, a site may be considered available where the local authority considers that constraints can be overcome in a timely manner.</p>
Achievability	<p>A site is assessed as achievable where it is considered deliverable and viable and there is reasonable prospect of it being available at a point in time. This is essentially a judgment about the economic viability of a site and also its deliverability in relation to current and emerging planning policies where appropriate.</p> <p>It is the role of the Sites Assessment Panel to help advise on the viability of sites. This may be supplemented by the use of viability assessment tools such as the Planning Advisory Service (PAS) viability toolkit.</p> <p>A site cannot be considered achievable if it is identified as unavailable or unsuitable. Sites require a timescale for delivery where suitable, available and achievable, namely 1-5, 6-10, 11-15 years or 16-20 years.</p>
Suitability for residential development	
<i>Green Belt</i>	<p>A Green Belt site may be considered suitable where it is located within an area of Green Belt proposed to be removed by the emerging development plan document. Areas of land proposed to be removed from the Green Belt but safeguarded for future development needs may be considered as suitable for longer term development needs.</p>
Cotswolds AONB	<p>A site may be considered suitable where it is sustainably located and is not in an area of 'high' landscape sensitivity (see landscape section below). However, in the absence of an evidence base relating to the landscape sensitivity of sites within the AONB a precautionary approach will be taken for the purpose of this assessment and sites will generally be considered unsuitable.</p>
Physical constraint: Flood Risk	<p>A site is assessed as unsuitable if entirely within flood zone 3a/b. This is informed by the Environment Agency Flood Zone Map, Strategic</p>

	<p>Flood Risk Assessment Level 1 (2008), Level 2 (2010) and Level 2 Additional Assessments (2013). A site's capacity will be adjusted where part of the site falls within flood zone 3a or 3b.</p> <p>Consideration will be given to whether the site includes a watercourse, culverted watercourse or planned scheme to mitigate flood risk.</p>
Physical constraint: Access	A site is not suitable if not physically accessible and constraints cannot be overcome within the achievability considerations.
Physical constraint: Topography	A site is not suitable if the topography of the site is steeply sloping or deemed a physical constraint on development. A site's capacity will be adjusted where part of the site is physically constrained by topography.
Evidence: Landscape	<p>The Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis is used to assess landscape sensitivity around the JCS Broad Locations (2011). In general, a site is considered unsuitable where it is assessed as being of 'high' landscape sensitivity. It is accepted that this does not cover the entire JCS area, where other landscape designations exist these will be noted but will not necessarily affect suitability.</p> <p>Where local landscape analysis exists, this will also be used to inform assessments.</p> <p>Gloucester City uses additional outputs from the WSP Landscape report commissioned as City Plan evidence to inform site assessment panel capacities. Tewkesbury Borough is using additional outputs from the Landscape Assessment for the Tewkesbury Borough Plan. Cheltenham published a landscape character, sensitivity and capacity assessment of Cotswold AONB within the Cheltenham Borough administrative boundary in April 2015. This document assesses suitability of a site in terms of its potential level of capacity. A site is considered unsuitable where it is assessed as being of 'low overall' 'resulting landscape capacity'</p>
Cordon Sanitaire	<p>A site is unsuitable if it falls within an identified cordon sanitaire.</p> <p>Nb. For Cheltenham areas of cordon sanitaire are identified within the adopted Local Plan as a Development Exclusion Zone. Para 4.6.22 of the JCS states there is potential for the zone to be reduced in size, however this work is on-going and will be assessed through the JCS examination.</p>
Contamination	The existence, or likely existence, or contamination will be considered in determining the suitability of the site. Where contamination is known to exist on a small site this may affect viability for residential use.
Suitability for economic development and other uses	
Employment development	<p>Sites are considered in accordance with the same criteria as residential development. The suitability of the site with regard to infrastructure requirements is also taken into consideration.</p> <p>A site can be considered suitable for both residential and employment uses.</p>
Other uses	Sites may be considered for other uses where appropriate to inform their development plans.
Capacity considerations	

Market adjustments to existing consents	For sites with planning consent, housing development capacities may be adjusted, taking into account any planning applications, local delivery evidence and the views of the 2016 site assessment panel where the existing planning consent is considered unviable or undeliverable under current market conditions.												
Density assumptions - residential	<p>The NPPF encourages local planning authorities to set their own approach to housing density to reflect local circumstances. Site capacities are assigned based on evidence from promoters of sites, urban design principles and other local information. Where evidence is unavailable, for Cheltenham and Gloucester, 40-50dph is generally used for the urban area and 30-40dph for areas outside of this. For Tewkesbury, 30-40dph is used for urban areas and 30dph for other areas.</p> <p>To account for a proportion of the site that will be taken up by infrastructure and landscaping, a density multiplier is applied to achieve a net developable area based on the following assumptions:</p> <p>Density Multiplier Assumptions</p> <table border="1"> <thead> <tr> <th>Site Size (ha)</th> <th>Discounted site area</th> <th>Area for housing</th> </tr> </thead> <tbody> <tr> <td>0-0.4</td> <td>10%</td> <td>90%</td> </tr> <tr> <td>0.4-2</td> <td>17%</td> <td>83%</td> </tr> <tr> <td>2+</td> <td>37%</td> <td>63%</td> </tr> </tbody> </table>	Site Size (ha)	Discounted site area	Area for housing	0-0.4	10%	90%	0.4-2	17%	83%	2+	37%	63%
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Density assumptions - employment	<p>Site capacity is expressed as a developable area in hectares. Where necessary this can be used to calculate floor space and jobs capacity using guidance on densities.</p> <p>It is for the plan making process to identify locations for specific types of employment development.</p>												
Cotswolds AONB	When assigning development capacities to sites within the AONB, regard will be had to NPPF paragraph 116 which states that ‘planning permission should be refused for major developments in these areas except in exceptional circumstances’.												
Evidence: Conservation	<p>Heritage is identified as a potential constraint on capacity and where a listed building or scheduled ancient monument exists figures may be adjusted accordingly.</p> <p>Gloucester undertook a review of all sites with regard to impact on heritage constraints for 2012 and 2013. Additional Historic Site Assessment to inform the SALA is currently being undertaken – where this has been completed for sites it has been incorporated into the SALA review for 2016.</p> <p>Additional heritage work to inform the SALA and site allocations in the emerging Cheltenham Plan has begun but will not be completed in time for the 2016 SALA panel, this data will be considered in future reviews of SALA once the work is complete.</p>												
Evidence: JCS Wildlife/Biodiversity	JCS Biodiversity Evidence is identified as a potential constraint on capacity where available but figures are not adjusted at this stage.												

Evidence: Green Infrastructure	Green Infrastructure is identified as a potential constraint on capacity where available but figures are not adjusted at this stage.
Contamination	Contamination is identified as a potential constraint on capacity but figures are not adjusted at this stage.
Involvement of local communities	
Community involvement	Community involvement includes any 'call for sites' carried out by a local authority as well as public consultation carried out as part of development plan preparation (for example the Gloucester City Plan sites consultation). Sites emerging from Neighbourhood Plan work will be incorporated into future SALA assessments..
Residential site phasing	
Purpose	To inform plan making and to provide evidence for the NPPF requirement for local authorities to produce housing trajectories and to maintain a 5 year supply of deliverable sites.
Time period	20 years
First five year period	Commences in 2015-16
Role of phasing	To give an indication of when dwellings on achievable development sites could be delivered, particularly during the first 5 years.
Small sites	The phasing of housing development on small sites will reflect the approach employed for the emerging Joint Core Strategy.
Green Belt sites	Where a site is proposed to be removed from the Green Belt by the emerging Joint Core Strategy it will not be included within the first 5 years unless evidence identifies progress has been made in bringing the site forward.
Greenfield sites	All potential greenfield sites have been included within residential sites phasing against appropriate delivery times. A greenfield site can be included in the first 5 years against realistic delivery rates where some progress has been made in bringing the site forward.
Lapse rate	A lapse rate may be applied to extant planning permissions - to be justified by local authorities based on local circumstances.
Windfalls	For the purpose of the housing trajectory an assumption about windfall development will be made in addition to the supply from planning consents and assessment sites. This relies on the windfall analysis undertaken in support of the JCS which projects past delivery trends forward for windfall sites of 0-4 dwellings, recognising that the majority of larger scale development will come forward through sites identified by Local Plans. The period of analysis was ten years to encompass the economic cycle (2003 to 2013). Windfall development occurring on garden land has been excluded from the figure in accordance with NPPF Paragraph 48. The windfall allowance is phased in following the first two years of the analysis period to ensure that double counting of extant permissions does not occur.

Assessment Matrix conformity	A site should only be identified to deliver within the first 5 years if it is considered 'deliverable' – i.e. suitable, available and achievable A site should be included within years 5+ where it is identified as developable in the longer term but not in the first 5 years. Delivery after the first five years is assigned to the time periods 6-10, 11-15 and 16-20 years.
Delivery rates	Delivery rates are justified based on local circumstances and evidence including that provided by developers. Where no developer update on residential sites phasing has been provided the following assumption is made: 25 dwellings in the first year and 50 dwellings per annum per developer thereafter.
Lead-in periods	For sites of less than 100 dwellings there is a 1 year lead-in from planning consent to completion of the first houses. For sites over 100 dwellings there is an 18 months lead-in period from planning consent to completion of the first houses.

Further work and County methodology

- 2.13 This is an evolving methodology which will be updated if necessary to reflect any new guidance. Work is also ongoing to develop a shared approach across the County of Gloucestershire to ensure that assessments within the Housing Market Area are compatible in order to comply with the emerging guidance.
- 2.14 During 2015 the council published a report that assessed the landscape character, sensitivity and capacity of land within the Borough that falls within the Cotswold Area of Outstanding Natural Beauty. The study comprised of two key phases: a landscape character and sensitivity study; and a value and capacity study. This work has been used to inform this assessment of sites which are within the AONB, the methodology was reviewed by the JCS authorities and amended accordingly to take account of this evidence.
- 2.15 Two areas which the Panel discussed in 2015 and which have resulted in changes to the methodology/assessment of sites related to 'Safeguarded Land' and employment sites.
- 2.16 In previous years the Panel have discussed the Council's approach to 'Safeguarded Land' as identified within the JCS. It was agreed that, land outside of the 'cordon sanitaire' is considered 'suitable for longer term development needs' for development and 'available' where promoted to the assessment. However the 'Safeguarded Land' has been classed as 'undeliverable' and hence 'unachievable' within the timescales indicated by the assessment.
- 2.17 The Panel discussed the employment land situation within Cheltenham Borough and raised concerns over both the potential loss of existing employment sites to other uses and the redevelopment of existing employment sites which would not necessarily result in a net gain of employment land.
- 2.18 It is important to note that whilst the assessment is an important evidence base for plan making it **does not** determine whether a site should be allocated for development.

The emerging local plan will consider a range of policy approaches to deliver Cheltenham Borough's housing and employment requirements, therefore the inclusion of sites at this stage does not necessarily mean that they will go on to be either allocated or for the use/capacity as indicated in this assessment.

- 2.19 It should be noted that the assessment provides the 'Gross' employment land supply figure. Any increase in employment supply through the Cheltenham Plan (allocations) would use a 'Net' figure to ensure land supply isn't being double counted. For the purpose of this assessment at this stage, 'gross' employment land capacity figures are considered suitable.
- 2.20 The assessment and supply of employment sites is a matter which the Council intends to consider further, with those involved in the delivery of employment land, to consider potential employment sites within the borough. Any additional information will further inform the Cheltenham Plan and future land availability assessments.

3. Next steps

Stage 3. Determining the housing potential of windfall sites where justified

- 3.1 According to the National Planning Practice Guidance, Stage 3 of the assessment is determining the housing potential of windfall sites where justified. The methodology in Section 2 of this report summarises an approach to windfalls.
- 3.2 A record of all development completed on small sites (1-4 dwellings) between April 2003 and 2013 is included in Table 8 of this report. An analysis of this data to inform the Submission JCS has identified that over the plan period approximately 82 dwellings per year should be expected from windfall development on small sites (nb. this calculation excludes development of residential gardens). Further update work is ongoing to inform the JCS Examination in Public, please see CBC Small Site Windfall update submitted to JCS Inspector Monday 15th February.

Stage 4. Assessment review

- 3.3 Stage 4 of the assessment involves bringing together the development potential of all sites to produce an indicative trajectory. Through the JCS process, Cheltenham is working with Gloucester and Tewkesbury in order to identify sites to meet development needs of the area. Indicative housing trajectories have been included in the JCS Housing Background Paper, and any subsequent updates as a result of the JCS Examination in Public.
- 3.4 The guidance states that an overall risk assessment should be made as to whether sites will come forward as anticipated. If there are insufficient sites then the assessment will need to be revisited in order to review assumptions and constraints. If, following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for, including how needs might be met in adjoining areas in accordance with the duty to cooperate.

Stage 5. Final evidence base

- 3.5 Stage 5 of the guidance relates to the use of the assessment as part of the evidence base for planning. This includes guidance on the identification of 'deliverable sites' in order to meet the five year housing land supply requirement contained in NPPF paragraph 47. Cheltenham Borough Council will publish its five year housing supply informed by the results of this assessment.

4. Site assessment tables

Table 1. Deliverable sites in locations identified by the Submission JCS as potential Strategic Allocations

Table 2. Deliverable sites (excluding locations identified by the Submission JCS as potential Strategic Allocations)

Table 3. Sites that are not considered deliverable in 2014 assessment

Table 4. Sites with redevelopment potential but where no net gain to housing or economic development uses is identified

Table 5. Sites with planning consent – projected delivery to inform trajectory

Table 6. Sites with planning consent subject to a completed S106 agreement – projected **delivery to inform trajectory**

Table 6 a Sites with planning consent subject to a completed s106 agreement which are not likely to be realised

Table 7. **Sites with prior approval for conversion of office to residential use – projected delivery to inform trajectory**

Table 8. Completions on small sites 2003 to 2013 – to inform windfall analysis