



CHELTENHAM
BOROUGH COUNCIL

ASSESSMENT OF AVAILABILITY

2016 – 2017

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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 March 2017. 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 Information included within this assessment may be used to inform decision making on planning applications, however this assessment is of a strategic nature, and therefore **should only be used as a starting point from which to further examine the sites suitability and achievability for the applied for development.**

1.4 The assessment of land availability can be viewed as a catalogue of sites, just because a site has been assessed through this method it does not mean that planning permission should or should not be approved, any planning application will be assessed based on the merits of the application and the ability of the scheme to overcome any constraints on or off site.

1.5 The assessment is part of the evidence base informing the Development 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.

1.6 The assessment will provide the basis for further work on Cheltenham's local site allocations contained in the Cheltenham Plan. A Preferred Options consultation is currently ongoing, more information can be found online at <http://consult.cheltenham.gov.uk/consult.ti/cododdo/consultationHome> and this assessment will form part of the evidence base informing future versions of the plan.

1.7 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 through the Authority Monitoring Report and as part of the emerging Housing Implementation Strategy, which can be found on the JCS website².

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

² <http://www.gct-jcs.org/New-Evidence-Base-and-Associated-Documents/Associated-Documents.aspx>

- 1.8 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.
- 1.9 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.
- 1.10 This year we have simplified the way information is presented in this report to make it more accessible. We have moved to a two table system the first showing sites that have been found to be deliverable only; the second showing the assessment of all sites included this year.
- 1.11 The latest information regarding windfall sites can be found in the latest version of the HIS available on the JCS website³.
- 1.12 This assessment has been dated so that it corresponds with the current monitoring year, previously the assessment has been dated according to the previous monitoring year, however this can be confusing when using the corresponding documents.
- 1.13 Although this assessment is not subject to a statutory consultation period, comments may be submitted to the Planning Policy team. 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:

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³ <http://www.gct-jcs.org/>

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 The full assessment process is summarised in the following flow chart shown in figure 1.

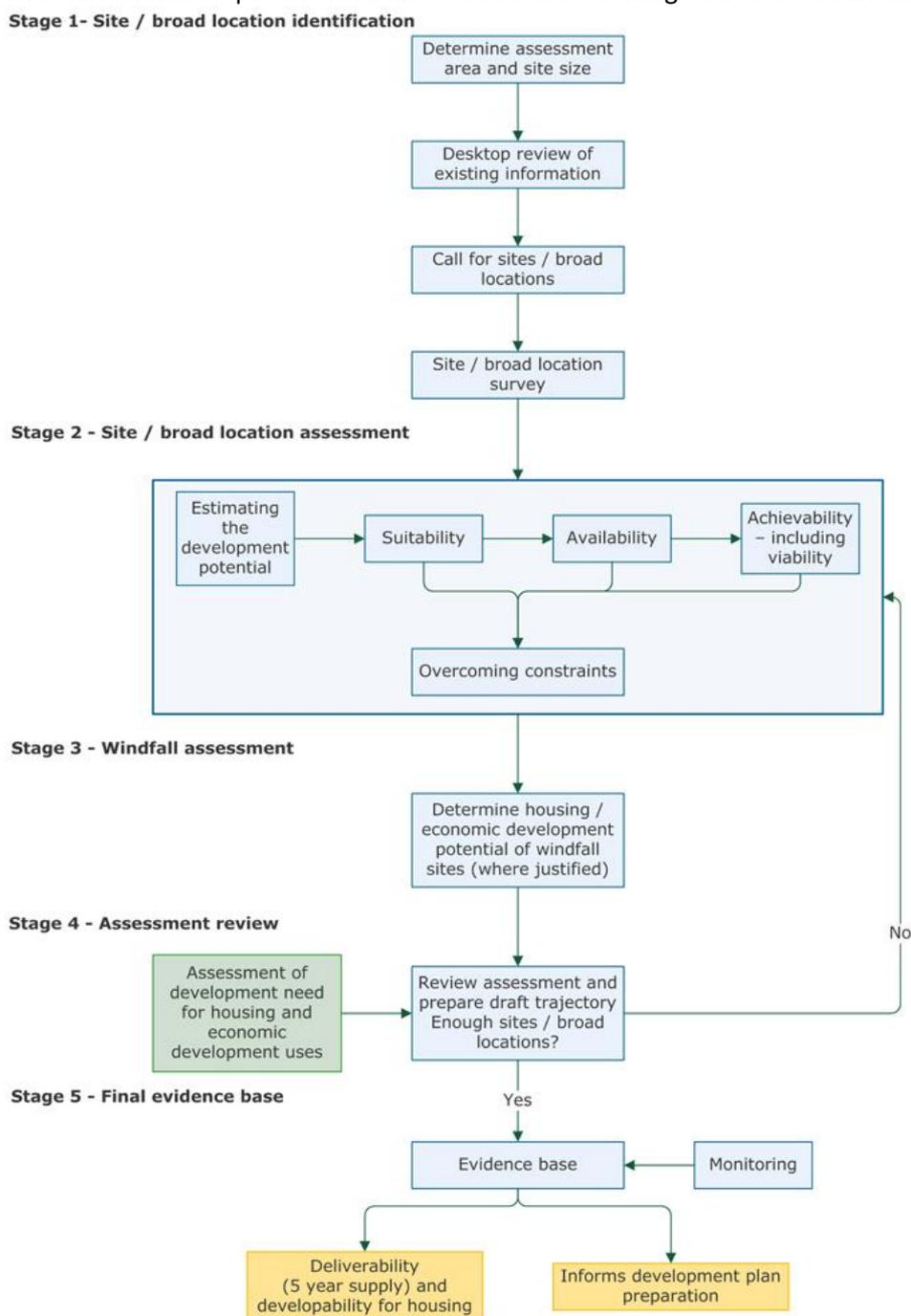


Figure 1- Method of identifying sites as stated in nPPG

2.3 Cheltenham Borough Council conducted a 'call for sites' between 8th November 2016 and 23rd December 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 10 new site submissions and a number of updates to sites previously submitted.

- 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 Cheltenham Borough Council Offices on 25th January 2017 where the purpose was to discuss and update 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 and 2 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 further discussion of windfalls included within chapter 3- *Next Steps*.

JCS AUTHORITIES' JOINT METHODOLOGY

- 2.8 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 the Site Assessment Panels. 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.
- 2.9 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, this has been discussed during the Examination of the Joint Core Strategy and the Inspector has indicated that she is happy with the identified approach. Further information relating to this can be found on the JCS website⁴.

Supply component	APPROACH
<i>Assessment sites from a range of sources:</i> (Nb: From 2013 onwards sites	EXISTING/DRAFT/EMERGING DEVELOPMENT PLAN SITE ALLOCATIONS

⁴ <http://www.gct-jcs.org/>

that could deliver 5 or more dwellings or covering 0.2ha are included in the assessment)	<hr/> Submitted sites <hr/> Officer-identified sites <hr/> Assessment sites from previous years SALA/SHLAA/SELAA studies <hr/> Expired planning permissions yielding 5 or more units from 2011/12 monitoring period onwards <hr/>
Planning consents	All extant planning consents for residential use are included in the assessment as potential housing sites
Criteria	
Suitability	<p>A site is considered suitable if it offers a suitable location for development and would contribute to the creation of sustainable, 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>	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.
Cotswolds AONB	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.
Physical constraint: Flood Risk	A site is assessed as unsuitable if entirely within flood zone 3a/b. This is informed by the Environment Agency Flood Zone Map, Strategic 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. Consideration will be given to whether the site includes a watercourse, culverted watercourse or planned scheme to mitigate flood risk.
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	A site is unsuitable if it falls within an identified cordon sanitaire. 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.
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	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. A site can be considered suitable for both residential and employment uses.
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 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. 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:

Density Multiplier Assumptions

Site Size (ha)	Discounted site area	Area for housing
0-0.4	10%	90%
0.4-2	17%	83%
2+	37%	63%

Density assumptions - employment 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. It is for the plan making process to identify locations for specific types of employment development.

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 Heritage is identified as a potential constraint on capacity and where a listed building of scheduled ancient monument exists figures may be adjusted accordingly. 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. 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.

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.

Figure 2- Assessment Process

FURTHER WORK AND COUNTY METHODOLOGY

- 2.10 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.
- 2.11 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 can be found on the Council's website⁵. 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.
- 2.12 During the panel meeting a number of points were made relating to the methodology used, these included: how sites are assessed when located within the Green Belt; how sites are assessed when located within the Cotswold Area of Outstanding Natural Beauty; and how the assessment is used by Development Management officers when applications are being assessed on sites which have been included within the SALA. However, the discussions have not resulted in any changes being made to the methodology used for this assessment.
- 2.13 It is important to note that whilst the assessment is an important part of the 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, this is further discussed in chapter five- *Cheltenham Plan*.
- 2.14 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

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https://www.cheltenham.gov.uk/downloads/file/5209/revised_cbc_landscape_assessment_main_report_-_may_2016

purpose of this assessment at this stage, 'gross' employment land capacity figures are considered suitable.

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.
- 3.2. The housing trajectory and five year supply will 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, which suggests an allowance of 68 dwellings per year can be counted to take account of windfall developments in the future, further information can be found on the JCS website⁶.

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 will be included in the emerging Housing Implementation Strategy.
- 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 in its Authority Monitoring Report.

⁶ <http://www.gct-jcs.org>

4. JOINT CORE STRATEGY

4.1 Through the JCS examination, the proposed strategic sites have changed since the previous version of the SALA was published. The sites now proposed to be included within the JCS, which include some land within Cheltenham Borough are North West Cheltenham and Land at West of Cheltenham. The JCS strategic sites incorporate all other submitted sites contained within their boundary.

4.2 Figure 3 lists all sites that are included within the assessment that are part of a strategic allocation through the JCS.

Site Ref	Site Name	Capacity dwellings	Suitable	Available	Achievable	Capacity ha	Suitable	Available	Achievable
S001	Land to the northwest of Cheltenham	2,225	YES	YES	YES	23	YES	YES	YES
S043	Land at Fiddlers Green	662	YES	YES	YES	25	YES	YES	YES
S044	Land at Fiddlers Green	347	YES	YES	YES	18.4	YES	YES	YES
S045	Land at Golden Valley	212	YES	YES	NO	11.2	YES	YES	NO

Figure 3- Sites included in the Joint Core Strategy

For further detailed assessments of these sites please see Tables 1 and 2.

5. CHELTENHAM PLAN

5.1 The Cheltenham Plan is progressing, and is currently at a Preferred Options Stage of consultation. Within that consultation, the Council have identified sites that are most suitable for development and are proposing for allocation. All of the sites proposed in the Preferred options document have been assessed through the SALA and are identified below:

Site Ref	Site Name	Capacity dwellings	Residential			Capacity ha	Economic		
			Suitable	Available	Achievable		Suitable	Available	Achievable
S041	Arle Nursery and allotments	207	YES	YES	YES	8.2	NO	YES	NO
S059	Springbank Shopping Centre	38	YES	YES	YES	0.51	YES	YES	YES
S064	Christ College Site B	90	YES	YES	YES	2.1	YES	NO	NO
S068	Land at Lansdown Road	42	YES	YES	YES	1	YES	YES	YES
S070	Reeves Field	40	YES	YES	YES	4.52	NO	YES	NO
S085	Rivershill House	44	YES	YES	YES	0.42	YES	YES	YES
S093	Former Monkscroft Primary School	30	YES	YES	YES	1.8	YES	YES	YES
S113	Premiere Products	50-70	YES	YES	YES	2.17	YES	YES	YES

S130	Land north west of Grovefield Way	159	NO	NO	NO	6.34	YES	YES	YES
S131	Jessop Avenue	15	NO	NO	NO	0.34	YES	YES	YES
S122/ S132	Land rear of Nuffield/ Hatherley Lane	44	YES	YES	YES	0.91	YES	YES	YES

Figure 4- Sites included in the Cheltenham Plan Preferred Options Consultation

6. SITE ASSESSMENT TABLES

Table 1. Deliverable sites only

Table 2. Assessment of all sites considered in this year's Strategic Assessment of Land Availability