

Green Belt Topic Paper

Questions already responded to as part of matters papers:

Many of the questions concerning review of the Green Belt in the Joint Core Strategy have already been answered through the sessions and written answers to questions in the Council's matters statements.

These include questions such as; what is the justification for the JCS only providing the higher level of plan making, e.g. major sites?, (Matter 1) Explain how the evidence base, including the AMEC report, is up-to-date robust and fit for purpose, (Matter 7) Evaluate omission sites, their characteristics and relationship to the JCS strategy, set out by district (Matter 9)

The relevant questions with links to the 'matter' paper they are contained within are included at Appendix 1. Read together the answers to these questions provide a comprehensive overview of the JCS' position on Green Belt review and the justification for looking only at strategic scale sites in this plan.

The purpose of this paper is to answer specific questions posed by the inspector during the October 2015 sessions of the JCS examination; namely...

Questions posed by the inspector during the October 2015 JCS examination sessions on omission sites:

- How do the parcel sizes in the AERC report compare with those in the AMEC report?
- Are there small areas of Green Belt identified in the AERC of lower sensitivity?
- Please set out how both reports assess each of these areas and what their capacities might be. What would be the total capacity? What about the capacity of small sites which could be merged into strategic sites? Which are least sensitive?
- Would the release of a parcel of smaller sites based on the AERC study amount to lesser harm than the release of JCS Strategic Site?
- Are there "gaps" in the JCS analysis of the green belt that mean that small sites have not been fully considered?
- What are the reasons for not releasing these smaller parcels now?
- Would release of these smaller parcels reduce the need for safeguarded land?
- Whose needs are the safeguarded areas intended to meet? Tewkesbury/ Gloucester or Cheltenham?
- Are some areas of Green Belt so degraded (E.g around Staverton that they should be released?)
- Is an ombudsman's decision concerning errors with drafting the Green Belt to the North of Cheltenham relevant to the JCS examination?

Through an assessment of relevant evidence and an analysis of each of the sites being promoted this paper gives an answer to each of the above. The following section details each of the key submitted areas of evidence base with links and a short description of their function.

Relevant evidence base documents and their contents:

AMEC JCS Greenbelt Assessment 2011

- ENAT 100

<http://www.gct-jcs.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

This is the Green Belt assessment prepared specifically for the JCS on a strategic scale and assessed all areas of Green Belt in the JCS area. It includes a table comparing their findings with those of the earlier AERC review for Cheltenham (Appendix E) and provides an explanation when a segment is scored differently.

AERC Cheltenham Green Belt Review 2007

- Exam 81

<http://www.gct-jcs.org/Documents/Examination-Document-Library/EXAM-81---AERC-Green-Belt-Review-2007.pdf>

This report was prepared for Cheltenham Borough Council in 2007, which was at that time preparing a borough local development framework in the context of the emerging South West Regional Spatial Strategy. The AERC review assessed the Green Belt within Cheltenham Borough utilising a small parcel size, relevant to the consideration of local / small scale development.

Greenbelt section of the Strategic Allocations Report

- EBLO 102 pp.12-16

<http://www.gct-jcs.org/Documents/EvidenceBase/JCS-Strategic-Allocations-report.pdf>

This sets out the approach the JCS authorities took to identifying relevant areas of Green Belt for changes in order to facilitate Strategic Urban Extensions. It covered the whole JCS area and used the AMEC report as its tool for searching for suitable locations.

Spatial Options Topic Paper

- ETOP 114

<http://www.gct-jcs.org/Documents/EvidenceBase/Spatial-Options-Topic-Paper-FinalPDF.pdf>

This topic paper provides a thorough appraisal of why maximising urban capacity and identifying strategic urban extensions to Gloucester and Cheltenham, with some rural distribution has been identified as the preferred spatial strategy and how other reasonable alternatives have been assessed, consulted on, and rejected.

Letters from AMEC

- (Appendix 2 of this paper)

November 2015 letter - addressing the specific question of comparing the AERC review to the AMEC assessment.

June 2015 letter addressing the relevance of the AMEC study and degree to which it is up to date (Appendix 1 of the JCS Matter 7 paper)

<http://www.gct-jcs.org/Documents/Examination-Document-Library/Matter-7-Written-Statement---JCS-Authorities.pdf>

JCS Strategic Site definition Note

- Exam 123

<http://www.gct-jcs.org/Documents/Examination-Document-Library-2/EXAM-123---Strategic-Site-Definition-Note.pdf>

A paper describing the reasoning behind the JCS' definition of a strategic site

Cheltenham Plan Issues and Options Consultation 2015

- Exam 16

<http://consult.cheltenham.gov.uk/consult.ti/CheltplanIO2015>

This consultation took place in summer 2015 and sought views on the suitability for development of all currently known locations for development across the Borough, including sites submitted in the Green Belt and AONB. Prior to the consultation starting the council contacted over 1,300 people, businesses and organisations; approximately 550 people, businesses and organisations returned completed questionnaires.

JCS Brownfield Paper

<http://www.gct-jcs.org/Documents/Examination-Document-Library/EXAM-77---JCS-Brownfield-paper.pdf>

JCS paper detailing how urban and brownfield site capacity was assessed before Greenbelt releases were considered, but there is insufficient brownfield capacity to meet the JCS's needs on its own.

District Plans Framework

(currently in production)

This work is due in the New Year, bringing together changes throughout the plan to indicate in each section the role of district plans.

Revised SP1, 2 and SD6 and SA1 drafts

(SP1 and 2 - Exam 130
SD6 and SA1 currently in production)

These revisions to policy will make clear the share of development to be accommodated by each settlement tier, that local changes to the Greenbelt to facilitate sustainable development can be undertaken in District Plans, and giving more specific requirements for strategic allocations.

Eip Suggested Changes

It was always the intention that district plans should have the ability to make local non-strategic changes to the detailed boundaries of the Green Belt if exceptional circumstances can be demonstrated. This would include making provision for gypsy and traveller accommodation, provision for local employment opportunities and potentially housing where the combination of exceptional sustainability and other considerations might amount to the required exceptional circumstances.

However, it was also clear from the AMEC Report that the potential for such further Green Belt releases given the particular purpose of the Green Belt and the other constraints affecting land that the potential for such releases was likely to be limited. Just how limited has been demonstrated by the paucity of sites advanced by objectors to the Core Strategy which in turn is reinforced by the local assessment of sites in support of the Local Plans. It is acknowledged, however, that the Core Strategy should provide a strategic steer for any Part 2 Green Belt revisions and a revised SD6 policy will be put before the Councils as a main modification to provide for this.

The JCS team also agreed that it is not appropriate to pursue the removal of land from the Green Belt simply to improve existing boundaries. This affected land which was to be taken out of the Green Belt to the east of Brockworth. The team also agreed that small Green Belt changes around Shurdington would not be appropriate within the Joint Core Strategy, and that it would be for Tewkesbury Borough Council to justify any such local changes through a Green Belt review at district level.

The JCS team also agreed that a small triangle of land at Grovefield Way should now be removed from the Green Belt because the permission for employment use of the site has now been partly implemented.

These changes mean: (consistent with the Brockworth and Shurdington changes requested)

- Land should not be taken out of the Green Belt in the JCS unless it is for an identified strategic need, or is to be safeguarded for future long term and strategic growth, consistent with the spatial strategy and capable of meeting needs stretching well beyond the plan period.
- District plans should continue to consider local housing and employment opportunities to assess whether the exceptional circumstances required for alterations to Green Belt boundaries can be made out.
- The JCS authorities remain fully committed to a two tier development plan which will evaluate strategic sites through the JCS and local sites through the district plans.

Sites of Local vs Strategic Scale in Cheltenham

The AMEC and AERC review use parcels of different sizes to assess the sensitivity of the Green Belt around Cheltenham; the maps at appendix 3 (Maps 1, 2 and 3) show the parcels examined at the periphery of Cheltenham by AERC in relation to the AMEC segments.

Appendix 3 map 1 shows the AMEC study with the numbers in each segment indicating the number of purposes of the Green Belt the segment was found to make a significant contribution to. Map 2 is the original full mapping provided by AERC showing the parcels they analysed, including some which are not within the Green Belt (see pg.16 of this topic

paper for explanation of why AERC also assessed some non-green belt parcels). Appendix 3 map 3 (in 4 parts) shows the areas of Cheltenham Borough within the Green Belt assessed by AERC and the overall AMEC classification of that area.

Alongside this Green Belt review work, for just under a decade, since 2008 Cheltenham Borough has compiled strategic land availability assessments identifying land with development potential across the local authority area.

Strategic Land Availability Assessments (SALA)

http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/2

These begin each year with a call for sites, including requests for updates on existing sites in the process; where developers, land owners and the public can submit locations for appraisal, which are then discussed and evaluated by a panel from the development industry including planning and development agents and registered providers, as to their deliverability. The JCS authorities use a common methodology for this work, and in recent years have held a Joint Panel to ensure consistency.

The results of the most recent (2014) SALA were fed into the Cheltenham Plan issues and options consultation. All sites in the SALA (sites capable of delivering at least five or more dwellings or 0.2 ha of employment land) including those not currently thought available, suitable or achievable were put forward in the consultation to yield commentary on the desirability of bringing sites forward in particular locations.

Therefore all submitted or officer identified land parcels were consulted on through the Cheltenham Plan issues and options consultation, including those omission sites identified in Cheltenham borough being discussed within the JCS¹. Map 1 of appendix 4 shows the AERC review parcels in relation to JCS omission sites and map 2 of appendix 4 shows JCS omission sites in relation to Cheltenham plan sites.

Map 3 is included in appendix 4 showing all Cheltenham Plan Issues and Options sites and Table 1 is included within appendix 4 identifying their reference numbers across both the AERC review and Cheltenham Plan and the 'approach' under which they are assessed later on in this paper.

These maps and tables demonstrate that there are no "mind the gap sites" in that *all* the sites identified as omission sites in the JCS within Cheltenham Borough are currently being evaluated by the Cheltenham Plan to determine if they could sustainability contribute to meeting the urban capacity figures for the Borough. However, the Green Belt assessments indicate that there is little scope for further release.

¹ With the exception of an area of AERC parcel A2 to the north of the racecourse, which was included in the JCS assessment of broad location C2, and contains riding schools, racecourse related buildings and land and includes a body of water. The location has not been proposed for residential development through the Cheltenham Plan and is within the critical gap between Cheltenham and Bishops Cleeve.

Three approaches to using this dataset

The JCS Green Belt review work relied upon the AMEC review. The JCS and AMEC agree that the segment size for this review was the appropriate and relevant scale for a review of this type, having regard to the main purpose of this particular Green Belt and recognising the role and function of the JCS as a strategic level plan, additional commentary on this is provided by way of a letter from AMEC in November 2015 in appendix 2.

However at the examination, further work was requested on how the AERC review considered the sensitivity of the Cheltenham urban fringe and how this related to all the sites which have been consulted on as part of the Cheltenham Plan (which is a bank of all known sites). These sites have been given indicative capacities, either from pre-application work submitted by the site promoter or by working out the potential yield of a site based on the character of the area in the context of previous local schemes. Since these calculations have not taken into account specific on site constraints or place making requirements they are provided for comparison purposes only.

Plotting the Cheltenham Plan issues and options identified sites and the two Green Belt reviews on the same map reveals that a large number of submitted local sites fall within the Cheltenham Green Belt. However many of these are within the boundaries of JCS proposed safeguarded land at West Cheltenham, or are identified as the highest level of sensitivity by both the AMEC and AERC reports.

The JCS strategic allocations work rejected sites which fell into the category of making a significant contribution to all four purposes of the Green Belt in the AMEC review. This excluded land at the Reddings and at North Cheltenham. (see appendix 3 map 1 and EBLO 102 pp.12-16)

Many of the segments in the AERC review score highly in terms of Green Belt sensitivity, particularly to the North of Cheltenham. Therefore, these were excluded from further review in this paper (scoring highly in both reports) – see appendix 3 maps 1,2 and 3. Some other sites were excluded from further review because they are already within the strategic allocation at North West Cheltenham, or within the Safeguarded land at West Cheltenham (already to be removed from the Green Belt for future use). (see appendix 5 map 1 and 2)

Again it is important to emphasise that *all* these sites are currently (also) under consideration through the Cheltenham Plan process and it is through this process that the councils have agreed to evaluate smaller sites on the Cheltenham periphery. However, it is clear from the evidence base that the realistic deliverable potential is small and would in no way provide an alternative to the strategic allocations having regard to their sustainability advantages and their ability to deliver a comprehensive package of essential infrastructure and service improvements critical to the delivery of the growth requirements and which would simply not be possible with dispersed smaller sites.

The mechanism for assessing local non-strategic revisions is the Cheltenham Plan review, which has been underway since 2013 and is now at “issues and options” stage. Below is a technical response to the questions posed by the inspector in the final session of October 2015, however the JCS authorities emphasise that the two tier structure of plan making in the JCS and Cheltenham plan is fundamental to the strategy.

Approach 1

Evaluating all Cheltenham Plan sites within the JCS or those within the AERC review

One approach to examining this dataset is considering all of the potential site options identified through the Cheltenham Plan (all sites) in relation to the AMEC and AERC reports. Appendix 4 map 3 shows all Cheltenham Plan potential development sites, some of which may be suitable for either employment or housing development or both. At this stage of considering the issues and options that will drive site selection of the Cheltenham Plan we have included all known sites so that we can sift them according to the best opportunities to accommodate sustainable development.

Appendix 6 map 1 is a map in three parts of all the sites being assessed in the preparation of the Cheltenham Plan which lie in the Green Belt.

A key decision made early in the JCS process is that the JCS forms the “structure plan” for the three council areas in that it allocates only large scale strategic development and creates a development management framework which guides the production of the district plans and assists in the granting of individual permissions. (Paragraph 1.5 pg.2 Submission JCS, see also the Council’s answer to Q44 (matter 1) and Q87 (matter 6)).

The district capacities within the JCS have been assessed using the urban capacity information available², taking into account sufficient flexibility through a broad and ample supply of potential district plan allocations and windfall sites, some of which may be within the Green Belt. Many of the sites included in the Cheltenham Plan potential options will not be suitable, but the urban capacity is made up of an estimate based on those sites thought to hold most potential to come forward, with sufficient alternative sites to meet the plan requirement should this not be the case. Each of the Cheltenham Plan sites is accompanied with a site form which identifies the characteristics of the site and whether, at this early level of testing, it appears to be suitable, available and achievable. These site forms are available as part of Exam 16 at: <http://consult.cheltenham.gov.uk/consult.ti/CheltplanIO2015>

After having looked at the district capacities for each local authority, taken together, they were found not be sufficient to meet the JCS’ housing requirement, and so therefore sustainable large scale urban extensions were considered³. These large scale urban extensions are the most appropriate strategy for the delivery of growth and supporting infrastructure, services and facilities. It is the combination of the need (and other benefits) and the most sustainable means of meeting that weighed against the effect of each extension on the purposes of the Green Belt which constitutes the exceptional circumstances justifying the release of strategic scale Green Belt release.

The local sites across the three authorities have not been assessed in full detail through the JCS, and are continuing to be reviewed thoroughly through the district plans. However, the JCS evidence base demonstrates that, notwithstanding that on paper there is a large pool of Cheltenham sites, the realistic potential when constraints are allowed for is limited and would in no way provide an alternative or partial alternative to the chosen strategy. There are no material “gaps” in the evidence base and it is sufficient to show that sustainable potential beyond the strategic allocations will be small in scale whether assessed individually or cumulatively.

² See, ‘ETOP 101a.6’ (pg.19) JCS Housing Background paper update April 2015, ‘Exam 77’ JCS Brownfield Paper, and ‘Exam 130’ proposed revisions to policies SP1 and SP2

³ See ‘ETOP114’ (p.57) Spatial Options Topic Paper and ‘EBLO 102’ (pg. 24) Strategic Allocations Report

It would not be realistic to allocate these small sites through the JCS given the need to respect local judgment, the timescale for the production of each of the plans and the more detailed further work which would need to be done. This approach to local sites would not match the aims and objectives of the JCS.

Potential for the Reddings to form an alternative JCS strategic allocation by clustering AERC parcels which are individually of lower sensitivity than the strategic AMEC parcel they are within

The Reddings area was identified as segment SE10 (appendix D4 in the AMEC JCS Green Belt Assessment ENAT100). Using the methodology used to assess Green Belt sites in the Strategic Allocations Report, (pg.15) this area was found to make a significant contribution to all four of the purposes for designation. The AERC review assesses those parcels within AMEC segment SE10 as; E1 - E3, these segments are given average scores.

Within AERC parcels E1 – E3 are Cheltenham Local Plan potential sites CP043 – 51. Together these have an indicative capacity of around 630 dwellings. Clustering all of these potential sites together therefore gives a capacity which meets the JCS' strategic scale site requirements.

However clustering parcels E1 – E3 for release (part of E1 will be released from the Green Belt to accommodate development under construction at Grovesfield Way) would effectively amount to half of AMEC segment SE10. On any analysis, having regard to the purpose of this Green Belt, the characteristics of the land involved, the manner in which the assessment was undertaken and the absence of any intervening clear, unbreached and defensible Green Belt boundaries, the AMEC segment assessment is more than adequate to form the basis for the assessment of this large clustered parcel. AMEC's November 2015 letter to the JCS (part of Appendix 2 of this paper) states:

“Would the definition of, for example, double the number of parcels (though the creation of a finer grain around settlement edges for example), have made a difference to the conclusions of the study? The answer is: most unlikely, given the clear strategic role of much of the Green Belt, being principally its separation function”

The more detailed subdivisions used in the AERC study were noted in research for the background to the study, but these fail to take account of the strategic context of Green Belt purposes across the Green Belt as a whole and hence the implications of potential release. This is particularly the case for the sensitive land between Cheltenham and Gloucester. In many cases, weak boundaries such as hedges and field boundaries were used as the basis of subdivision, which renders a complex pattern which can be confusing, particularly where a strategic overview is required

The point raised by AMEC as to the difficulty in establishing a firm boundary for these segments in what is a complex area is raised in the AMEC report's overall evaluation of the segment: (pg.D4)

“A complex (structurally and in land use) area defined by the strong boundaries of the Cheltenham – Gloucester railway to the south, A40 to the north and M5 to the west. The land, despite some significant compromises to its openness to the east of its extent (principally associated with linear development at the Reddings) nevertheless plays a critical role in the separation of Cheltenham and Gloucester, particularly at this point where the Green Belt is at its narrowest. It plays a role in preventing ribbon development along the A40 corridor.”

As this assessment shows, AMEC assessed local variations within the segments which allows for use of the study to form a broad view on the potential for lesser development.

Further, the AERC study did not of course look at these parcels taken together with strategic site potential in mind. Rather, it looked individually at each one.

The AERC study did not consider sound proposed rolling forward of the infill development policy currently in place in The Reddings (AERC report pg.33) which allows small scale infill development of this area as it “would not contribute positively to Green Belt purposes”.

South Western expansion for strategic development was therefore not recommended by either study, and looking at a larger scale development, the AMEC review indicates that the area is more sensitive.

Development at the Reddings does not represent an alternative safeguarded area to West Cheltenham, as both the AERC and AMEC reports broadly concur that land at the Reddings is more sensitive to Green Belt purposes than the land within the Safeguarded Area at West Cheltenham they reviewed⁴. The area also does not have as much capacity to allow for development well beyond the current plan period, in comparison with West Cheltenham in accordance with paragraph 85 of the NPPF.

The Cheltenham Plan Issues an Options Consultation statement highlights key messages from the consultation held in summer 2015

http://www.cheltenham.gov.uk/downloads/file/4765/cheltenham_plan_part_one_issues_and_options_consultation

The vast majority of comments made in relation to Green Belt sites were not supportive of development and expressed the need to maintain the existing Green Belt boundaries. Land at and adjacent to the Reddings and land at West Cheltenham (JCS safeguarded land) were highly cited.

A good proportion of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many also referenced the JCS examination and challenged Cheltenham’s housing numbers (objectively assessed housing need).

The Reddings may provide opportunities for some local development so work is continuing to appraise the ability of Cheltenham Plan Sites CP043 – 51 to deliver local needs to go towards meeting the Cheltenham Borough JCS requirement, and whether, in light of alternative local sites, exceptional circumstances exist to release them from the Green Belt. This is appropriate as it provides the opportunity to focus consultation and evidence on areas directly affected by any proposals. It will be for the Cheltenham Plan examination to consider these decisions in each case in accordance with the tests of soundness.

Consideration of other sites which are not near JCS proposed changes to the Green Belt, and their ability to cluster together to form a strategic allocation

⁴ AERC parcels E1- E3 (The Reddings) are recorded as average scores, whereas parcels F5-7 and F10 (The majority of the West Cheltenham area scored by the report) have the lowest scores, and only parcels F8 and F9 have average scores. AMEC scores segment SE10 (The Reddings) as making a significant contribution to all 4 of the purposes of Green Belt, whereas segment NE4 (West Cheltenham) makes a significant contribution only to 3 – it scores lower on the ‘contribution to the setting’ of Cheltenham.

The area at Hunting Butts (CP004 AERC segment G17) is considered in this paper as part of approach 2 on pg.11 CP022 is considered as part of approach 3. CP005 is largely within AERC parcel G18 and AMEC segment NE18 and is considered as part of the most sensitive green belt land by both reports.

CP018 – 21 are in the North of Cheltenham near to the racecourse. They are within parcels A6, A3 and A8 of the AERC report (average scores) and NE22 of the AMEC report (making a significant contribution to all 4 purposes of Green Belt). CP018 and 19 (parcel A6) of the AERC review together have an indicative capacity of approximately 150 homes. CP020 (parcel A3) is physically separate from parcel CP018 and 19 has an indicative capacity of 362 homes, but is an officer identified site, as is CP021 which has an indicative capacity of 523. Officer identified sites have not been submitted by a prospective developer, but have been included in the desktop study for completeness.

CP018 – 19 are together too small to constitute a JCS strategic site, and are part of the highly sensitive NE22 green belt parcel identified in the AMEC study. CP020 and 21 are similarly part of NE22, and could not be developed alone in keeping with the JCS spatial strategy of urban extensions, as they are separated from the urban edge by the racecourse and ribbon development at Shaw Green Lane and are outside the Cheltenham Principal Urban Area. Development here would be a significant intrusion into the separation between Cheltenham and Bishops' Cleve, which is a key purpose of the JCS Green Belt.

Cheltenham Plan sites CP018 - 21 were all included in the Cheltenham Plan Issues and Options consultation, to assess their contribution to local needs, but their potential is limited by the factors identified above. Parcel CP022 is considered as part of approach 3 on pg.17

In conclusion, looking at all Cheltenham Plan sites, there is no parcel of sites assessed by AERC in the Green Belt within Cheltenham Borough which would be of lower sensitivity than the primary Green Belt strategic allocation for the town, which is North West Cheltenham. The December 2015 'update on housing matters' paper figure 5 'Duty to Cooperate Contributions from the Development Pool' (submitted alongside this paper) shows that according to the current trajectory for build out of the strategic sites and the current housing land supply trajectory (for CBC), Cheltenham Borough's needs can be met in any given year either by development at A6 South Cheltenham (Leckhampton) and/or A5 North West Cheltenham.

The contributions from these sites are pooled between the JCS authorities, as with all urban extensions, but the Cheltenham JCS urban extensions are sufficient to meet Cheltenham's needs; therefore, it is relevant to assess alternative green belt sites in relation to the sensitivity of A5 rather than any other site.

The AERC and AMEC reports agree that The Reddings area is of higher sensitivity than that within the Strategic Allocation at North West Cheltenham and this difference in sensitivity is particularly apparent at the strategic scale in the AMEC report. The area does not represent an alternative to safeguarding West Cheltenham, because of the above reasons and because it is not large enough to meet longer term development needs well beyond the plan period.

The Cheltenham Plan potential sites submitted in this area were part of the Cheltenham Plan issues and options consultation and will be appraised in more detail for local needs, with particular regard to any smaller sites adjacent to existing built development and where a strong Green Belt boundary could be created, or limited infill opportunities may exist.

Approach 2

A second approach to the dataset identified in the examination could be to assess if there are areas of Green Belt which have been assessed in smaller parcels by the AERC report which, if of lower sensitivity, could be merged into existing strategic allocations or safeguarded areas. A map showing the relevant Cheltenham Plan sites is included at appendix 6 as map 2 (parts 1 and 2 show the north west and south of the borough).

AERC parcels near but outside the strategic allocation boundary of A6 Leckhampton

AERC identified parcels D4 and D6 to the south of Cheltenham within the Cheltenham Borough Boundary.⁵ Both segments are recorded as 'average' scores in the AERC report, but the segment as a whole (SE2) is identified as making a significant contribution to the purposes of the Green Belt within the AMEC report. Since strategic allocation A6 Leckhampton is wholly outside of the Green Belt, any integration of Green Belt parcels would need to demonstrate exceptional circumstances for their inclusion. (See Appendix 5 map 4)

AERC parcels D4 and D6 contain potential Cheltenham Plan sites CP098 and CP031. The indicative capacity of these parcels together is approximately 80 homes. CP098 is wholly within the Green Belt and AONB and is the closest Cheltenham Plan site covered by the AERC report to the Leckhampton Strategic Allocation. CP098 is separated from the strategic allocation by the indicative green space element of the strategic allocation, Church Road, and a triangular field. CP031 is further east and further away from the Strategic allocation again. Therefore neither offers a suitable option to integrate into the strategic allocation. Both are under consideration within the Cheltenham Plan for local development potential but, as is clear from this analysis, the potential is limited.

AERC parcels near but outside the strategic allocation boundary of A5 North West Cheltenham

This paper does not include commentary on parcels which were given the highest Green Belt sensitivity scores by the AERC report, as the purpose of this investigation is to consider in more detail any AERC parcels of lower sensitivity near strategic allocations and whether they could be integrated into the strategic allocation boundary. This excludes parcels G3 (not in the Green Belt), G10, G11, G16, G18 which are all given the highest scores by the AERC report. Remaining is parcel G17 which was identified as an average score in the AERC report. AERC parcel G17 falls within AMEC parcel NE18, which makes a significant contribution to all four purposes of the green belt.

AERC Parcel G17 contains (but is smaller than) potential Cheltenham Plan site CP004, which as a whole has an indicative capacity of 229 dwellings. However only around half of CP004 falls within the 'average' Green Belt sensitivity area identified by the AERC study, the northern part of CP004 is within AERC parcel G16 which has the highest Green Belt sensitivity scores.

CP004 would not easily integrate into the North West Cheltenham Strategic Allocation (A5) because Swindon Village lies between it and the allocation, as does the main railway line

⁵ The AERC report did not assess Green Belt outside the Cheltenham Borough Boundary, such as that at Brizen Farm or around Chargrove Lane, however these areas are covered by the AMEC study which was used in the preparation of the JCS.

and Wyman's lane. These features and the distances between them demonstrate the lack of spatial relationship between this parcel and the strategic allocation.

Part of Cheltenham Plan Site CP004 was considered earlier in the JCS process as a potential strategic allocation in its own right (C2 pg. 55 -61 of the Strategic Allocations Report <http://www.gct-jcs.org/Documents/EvidenceBase/JCS-Strategic-Allocations-report.pdf>). The larger C2 strategic site was dismissed on the grounds that a site of strategic scale at this location would run contrary to the JCS' methodology of not seeking to allocate strategic development in locations where the Green Belt had been found through the AMEC study to make a significant contribution to all four purposes of Green Belt.

A further reason for not progressing the C2 strategic allocation was because of the topography and landscape value of the area. No acceptably strong Green Belt boundary currently exists which would delineate the site from the rising scarp, or has been suggested through master planning. It would be very difficult for a boundary such as a road for example not to harm the openness of the Green Belt especially because of the site's constraints including the adjacent railway line. Further commentary on omission site C2 has been provided in the council's JCS Matter Statement 9, omission sites <http://www.gct-jcs.org/Documents/Examination-Document-Library/Matter-9-JCS-Authorities/Matter-9-Omission-Sites---JCS-Authorities-Position-Statement.pdf>

Whilst the consideration of C2 as a strategic site was not taken forward because the area is not deemed suitable to accommodate the level of growth needed to be included in the JCS (more than 450 houses); CP004 continues to be considered within the Cheltenham Plan and was consulted on during the summer 2015 issues and options consultation to examine whether it could sustainably accommodate a smaller level of local development. Again, the evidence shows that this potential will be limited.

As with all the Green Belt Cheltenham Plan sites, work is continuing to appraise their ability to deliver local needs to go towards meeting the Cheltenham Borough JCS requirement, and whether, in light of alternative local sites, exceptional circumstances exist to release them from the Green Belt. It will be for the Cheltenham Plan examination to consider these decisions in each case in accordance with the tests of soundness.

Principles underlying the JCS proposed designation of the West Cheltenham Safeguarded Area

The West Cheltenham Safeguarded Area (Appendix 5 map 2, JCS Proposals Map 5, AMEC segment NE4) is proposed through the JCS to be removed from the Green Belt but not allocated for development at the present time.

This is in accordance with NPPF paragraph 85 which states authorities should:

"Where necessary, identify in their plans areas of Safeguarded land between the Urban Area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period".

The NPPF does not require that authorities know at the time of safeguarding exactly the scale and quantum of these needs, or specifically what proportion of the safeguarded area should be used for each authority's requirements when the safeguarded area crosses local authority boundaries. The decision to develop safeguarded land can only be made through a local plan review which proposes release.

The purpose of safeguarding the West Cheltenham area is to identify the best area given known constraints capable of providing a future urban extension to Cheltenham with

sufficient land to meet longer term need well beyond the Plan period. It will contribute to the JCS area's employment needs, and the future housing needs of the JCS authorities, particularly Cheltenham, but also Tewkesbury's needs arising from the growth of nearby Churchdown and Staverton.

Should the JCS identify an allocation for this area; a specific boundary for the allocation will be drawn, taking into account the development that is proposed, supporting evidence and master planning principles.

Further discussion of the case for the West Cheltenham Safeguarded area is included in the:

Strategic Allocations Report pg. 68 – 72 <http://www.gct-jcs.org/Documents/EvidenceBase/JCS-Strategic-Allocations-report.pdf>)

The JCS authorities Matter 9 Omission Sites Statement pg. 5 and 17 <http://www.gct-jcs.org/Documents/Examination-Document-Library/Matter-9-JCS-Authorities/Matter-9-Omission-Sites---JCS-Authorities-Position-Statement.pdf>

JCS Economic Update Paper Exam 139 Section 4 - Potential Additional Strategic allocations - West Cheltenham: <http://www.gct-jcs.org/Documents/Examination-Document-Library-2/EXAM-139---JCS-Economic-Update-Paper.pdf>

JCS authorities note on west Cheltenham Exam 125a

<http://www.gct-jcs.org/Documents/Examination-Document-Library-2/EXAM-125A-West-Cheltenham-updated-note-to-the-inspector.pdf>

West Cheltenham Statement of common ground Exam 125b

<http://www.gct-jcs.org/Documents/Examination-Document-Library-2/EXAM-125B---West-Cheltenham-Statement-of-Common-Ground.pdf>

AERC parcels near but outside the safeguarded area boundary of West Cheltenham to the North

AERC parcel F1 is a triangular parcel of Green Belt to the north of Old Gloucester Road, but to the south of the Tewkesbury Road. The AERC report gives the parcel an average score, and the land falls within AMEC parcel NE6 which makes a significant contribution to three of the four purposes of green belt, whilst making a contribution to the setting of Cheltenham.

AERC parcel F1 contains potential Cheltenham Plan sites CP034 and CP035, which together have an indicative capacity of approximately 270 houses. CP034 and CP035 are separated from the West Cheltenham Safeguarded area by the Old Gloucester Road, which provides the most consistent and strong long term boundary for the Green Belt in this location as a whole.

In the AERC study, the F1 parcel is of greater Green Belt sensitivity than most of the Green Belt contained within the West Cheltenham Safeguarded area (Segments F5, F6, F7 and F10) although segments F9 and F8 are also of average sensitivity. In the AMEC study segments NE4 and NE6 are of roughly equivalent sensitivity.

Because of the increased flood risk in this area shown at appendix 5 map 3 'North of West Cheltenham Safeguarded Area flood zones' and discussed in more detail in the next section, and because the segment does not adjoin a strategic allocation and is not in itself large enough to meet the JCS' strategic allocation criteria, the AERC F1 segment is not being progressed for strategic allocation through the JCS. CP034, CPO35 and CP004 continue to be considered within the Cheltenham Plan and were consulted on during the summer 2015 issues and options consultation to examine whether they could sustainably accommodate a smaller level of local development.

The case for extending the safeguarded area to the North or removing AMEC segment NE6 from the Green Belt.

The AERC F1 parcel and the wider AMEC parcel NE6 are considerably constrained by flood risk (see appendix 5 map 3 'North of West Cheltenham Safeguarded Area flood zones') in comparison with the West Cheltenham safeguarded area. This would make any sensible comprehensive development difficult to achieve.

There is no justification at this time to remove AMEC segment NE6 from the Green Belt, as it is of higher Green Belt sensitivity in the AMEC Green Belt assessment than the segments within the North West Cheltenham strategic allocation⁶ and has a poor flood risk profile. It also does not represent a good alternative or addition to the safeguarded land at West Cheltenham because of its separation from AMEC area NE4 by Old Gloucester Road, its limited shared boundary with the existing town in comparison. There is no evidence that the West Cheltenham safeguarded land needs to be larger, given it clearly has sufficient size to meet needs well beyond the plan period. There are no exceptional circumstances which would justify a revision here.

The case for extending the safeguarded area to the South

AERC parcels F11 – F15 are situated to the south of the B4063 and Pheasant Lane, which form the boundary of the West Cheltenham safeguarded area. In the AERC review these parcels are each given an average score, in the AMEC Green Belt assessment they are contained within segments NE1 – 3. These segments all make a significant contribution to the Green Belt, a significant contribution to checking the unrestricted sprawl of built up areas, Preventing nearby towns from merging, and assisting in safeguarding the countryside from encroachment. Segments NE1 -3 make a contribution to preserving the setting and character of historic towns. These scores in the AMEC report mirror those of segment NE4.

As with the previous consideration of extending the safeguarded area to the North of AMEC segment NE4, there is no evidence that the safeguarded area needs to be increased beyond its current boundaries, since it contains sufficient land for development well beyond the plan period. The B4063 and Pheasant Lane are clear physical features that are readily recognisable and are likely to be permanent, in keeping with NPPF paragraph 85.

Were the West Cheltenham safeguarded area to extend beyond the boundary of these roads, then the next strong boundary options would be the B4063 to the South, Bamfurlong Lane, or the A40. Each of these options would remove an increasingly large amount of land from the Green Belt which the AMEC report deems is significant to three of the four purposes. The JCS authorities do not consider that exceptional circumstances exist justify

⁶ Because the main part of this segment is within Tewkesbury Borough, most of the land in this location was not included in the Cheltenham AERC review. This emphasises the value and importance of the strategic approach adopted by the later JCS AMEC assessment, as this is a large parcel of land which requires review as a whole, and in a wider context to appreciate its Green Belt sensitivity.

such a change. It is also noted that there has been no substantial support for increasing the size of the safeguarded land.

The case for allocating CP034, CP038 – CP042 instead of another JCS strategic allocation

AERC parcels F11 - F15 contain potential Cheltenham Plan sites CP034 and CP038 - 42 (see map 2 appendix 6) which together have an indicative housing capacity of around 820 dwellings. Together these parcels would indicatively contain enough development to meet the JCS threshold for strategic development.

However, taking the AERC parcels together, they equate to three of the AMEC segments NE1 – 3, which are deemed to perform a significant contribution to the Green Belt. Both the AERC and AMEC reports grade each of the segments in this area equally in accordance with each study's methodology; therefore there is no advantage to be gained from releasing one as opposed to another.

CP034, CP038 – CP042 have no proximity to an existing JCS strategic allocation, so cannot be merged with one. Discussion of the potential for these parcels to add to or act as an alternative to the West Cheltenham safeguarded area is discussed above. Therefore they would fall to be considered as an alternative strategic allocation either on its own or together with the cluster of sites around the Reddings.

Neither option performs having regard to the strategy of the JCS and neither would be a more appropriate option than those strategic allocations selected by the JCS.

For example, A6 Leckhampton is not in the Green Belt, and therefore is sequentially preferable to these sites. The Council's assessment of the A6 site do not disclose any constraints which would justify protecting this site over and above Green Belt sites. Development at North Churchdown is well located to meet the needs of Gloucester rather than those of Cheltenham and this cluster of sites cannot sensibly be regarded as an alternative. Ashchurch is too distant from this location to be a realistic alternative and also will not contribute materially to Cheltenham's needs.

In terms of the comparison with North West Cheltenham, the AERC and AMEC reports agree that on average the Green Belt to the south of the West Cheltenham Safeguarded area is of higher sensitivity than that within the Strategic Allocation at North West Cheltenham.

Development around AERC parcel F14 would need to integrate the current park homes development to create sensible access and an appropriate urban edge.

Because of these factors, CP034, CP038 – CP042 taken together are not suitable candidates for strategic development within the JCS.

However, as with all the Green Belt Cheltenham Plan sites, work is continuing to appraise their ability to deliver local needs to go towards meeting the Cheltenham Borough JCS requirement, and whether, in light of alternative local sites, exceptional circumstances exist to release them from the Green Belt. It will be for the Cheltenham Plan examination to consider these decisions in each case in accordance with the tests of soundness.

Alongside this consideration in the Cheltenham Plan, if and when proposals are identified for an allocation within the West Cheltenham safeguarded area, it is possible that some smaller

scale development within CP034, CP038 – CP042 could build into a future master plan for the location, if the constraints in this section were satisfactorily addressed.

Approach 3

A third approach to the dataset identified in the examination would be to assess if there are areas of Green Belt assessed by AERC which contrast in their assessment most strongly with those in the AMEC assessment; i.e. segments identified as having the highest scores in the AMEC assessment which have the lowest scores in the AERC review. See Appendix 6 Map 3 East and West, and cross reference with the AMEC and AERC maps in Appendix 3 for the location of each of the sites and parcels mentioned below.

The AERC assessment included parcels D21 and D22 within Cheltenham Borough which are assigned with the lowest scores for Green Belt sensitivity in the AERC work, but are also within the AONB. Most of D21 is not in the Green Belt and most of D22 is made up of Charlton Kings common. No Cheltenham Plan site options exist within either parcel.

AERC parcels D6 – D20 and B3, B4 are also in the AONB but are not in the Green Belt. They were included in the AERC review because part of the study's aims were to look at some non-Green Belt parcels to assess if “compensatory” Green Belt could be created if Green Belt land were lost through development in the RSS. None of the parcels above were considered suitable for such “compensation” (AERC review pg. 58), and the concept of “compensatory” Green Belt additions to balance removals does not exist within the NPPF.

In accordance with NPPF paragraphs 115 and 116, the AONB is not considered an appropriate location for strategic allocations (Submission JCS 3.2.16 pg.34) but through the issues and options consultation AONB locations are being reviewed for local development. Cheltenham Borough Council has published an AONB landscape review (2015) to assist with this process, which was part of the Issues and Options consultation. No Cheltenham Plan site options exist within AERC parcels D6 - D20. B4 contains Cheltenham Plan option site CP100 which has an indicative capacity of 277 dwellings.

B1 and B2 are not in the Green Belt or the AONB. They contain Cheltenham Plan option site CP023 which has an indicative capacity of 126 dwellings.

CP100 and CP023 are not near a JCS strategic allocation or safeguarded area, and CP100 is in the AONB. Neither is large enough to meet the required size to amount to a JCS strategic allocation on their own, and their impact on the AONB and its setting will be an important part of the Cheltenham Plan's evaluation of these sites in regard to meeting local needs.

There is also no detailed information available regarding the access, infrastructure or strategic deliverability of this cluster of sites. No comprehensive master plan has been submitted and the sites do not share a common boundary, although there is existing residential development nearby.

Because of these factors, CP023 and CP100 taken together are not suitable candidates for strategic development within the JCS. However, as with all the Green Belt Cheltenham Plan sites, work is continuing to appraise their ability to deliver local needs to go towards meeting the Cheltenham Borough JCS requirement.

Other lowest scores in the AERC review were parcel D2 which is almost all within the JCS A6 Leckhampton Strategic Allocation and is not in the Green Belt, and parcels F5,F6,F7 and F10 which are within the West Cheltenham Safeguarded Land boundary and G4, G6, G7 and G8 which are within the North West Cheltenham Strategic Allocation boundary.

AERC parcels F2,F3 and F4 are not in the Green Belt and are within the Cheltenham Principal Urban Area. These parcels contain CP052 which has an indicative capacity of 38 dwellings. CP052 is a relatively small site and does not meet the JCS criteria for strategic allocation. It is too far from the West Cheltenham Safeguarded area or North West Cheltenham to be considered for merging with these, and therefore it is appropriate to continue to consider it along with the other Cheltenham Plan sites within the Principal Urban Area for possible allocation in that plan.

AERC parcels A5 and A9 contain potential Cheltenham Local Plan sites CP015 - 17 (A5) and CP022 (A9). These are contained within AMEC segment NE22 which makes a significant contribution to all four purposes of the Green Belt. A5 has a total indicative capacity of 100 homes and A9 200 homes. The two sites are both in the North of Cheltenham but do not share a boundary and are set apart from one another, with existing development and the racecourse boundary in between.

AERC sees the north of Cheltenham as a whole, as the most sensitive area it examined (pg. 23 3.5.1) pg.58 (8.1.12), whilst the AMEC review gives segments in this location the highest scores. These segments are particular in that they are given lower scores than those surrounding them in the AERC review.

Parcels A5 and A9 are too far from existing JCS strategic allocations or safeguarded areas to be suitable candidates for merger.

A5 was considered for release in the Draft Joint Core Strategy, not as part of an allocated site or with a specific associated number of dwellings but to assist the drawing of a more consistent Green Belt Boundary:

Draft JCS Policy S5

"North East Cheltenham Small changes to the green belt boundary in North East Cheltenham (shown on Inset Map 2) have been made to ensure that there is a constant approach to which areas of land in this area are within the green belt, and to enable the further development of facilities at Cheltenham Racecourse."

Page vii of the Pre Submission Joint Core Strategy reports:

"The decision not to remove land at North Cheltenham from the Green Belt has been made by Members."

JCS councils considered the removal of parcel A5 not to be a strategic change which was appropriate to take forward as part of the Core Strategy. These segments to the North of Cheltenham are not in a particularly accessible location to help with the needs of other JCS authorities, as they are distant from Gloucester and Tewkesbury town.

Parcel A9 CPO22 is not large enough to offer the opportunity for a JCS strategic site but the consideration of these local sites will continue in Cheltenham Plan to see whether they could sustainably contribute to Cheltenham's Borough need. Both parcels A5 and A9 and their respective Cheltenham Plan potential sites were consulted on as part of the Issues and Options consultation of summer 2015.

Other Questions Asked:

- **Are some areas of Green Belt so degraded (E.g around Staverton that they should be released?)**

There is no evidence that Green Belt land around Staverton Airport is degraded and should be released from the Green Belt. This land in AMEC segment NW2 makes a significant contribution to the Green Belt overall, making a significant contribution to the purposes of checking the unrestricted sprawl of large built up areas, and preventing nearby towns merging into one another.

The AMEC report states (pg.D5)

“Although the majority of this segment is open land given over to airport uses, there are hard runways and associated peripheral hangers which given it a more urbanised feel. However, overall the land is considered to be open, providing distant views towards Churchdown and Churchdown Hill to the south and the Cotswold escarpment to the east. (particularly from Bamfurlong lane) This plays an important role in the separation of the settlements at this narrow point in the Green Belt.”

All of the areas which make a more limited contribution to the Green Belt as identified in the AMEC assessment (with the exception of Twigworth, which was removed) are proposed for the site of a JCS strategic allocation, therefore there is no evidence of ‘degraded land’ which would better provide for JCS releases.

- **Is an ombudsman’s decision concerning errors with drafting the Green Belt to the North of Cheltenham relevant to the JCS examination?**

A cartographic error arose in 1991 in the drafting of the Cheltenham local plan which showed land at New Barn lane being outside of the greenbelt, which was incorrect. No objections were raised during the consultation related to that plan, so when an application was subsequently submitted it was granted consent; however the officer report did flag up the issues relating to the drafting issue.

In 2004, the Council took the decision to re-designate the relevant parcels back into the green belt and this was actioned through the Cheltenham Borough Local Plan Second Review.

Therefore because the error was identified in 2004 and was corrected in 2006, it does not have a bearing on the current JCS examination. More information on the correction of this error can be found through the link below:

<https://democracy.cheltenham.gov.uk/Data/Council/20040726/Agenda/2004%2007%2026%20Council%20Local%20Plan%20Green%20Belt%20Issue.pdf>

Conclusions

The review of local sites within Cheltenham Borough is continuing through the Cheltenham Plan's development. There is no more appropriate strategy for the JCS than the focus on the selected strategic urban extensions which, in contrast with other areas of land are more sustainably assessed against the NPPF as a whole, deliverable in tandem with essential infrastructure and service/facilities upgrades and ideally located to meet need where it arises. This combination of factors leads to a finding that exceptional circumstances exist for the release of these Green Belt sites. Any smaller site potential is not a realistic or sustainable alternative but can be deployed where necessary to introduce some local flexibility in the provision for development which, in conjunction with the safeguarded land will ensure that the Green Belt boundaries endure well beyond the JCS plan period. No sites are being left behind, because each site which is not of strategic scale is being considered through district plans. This means there are no "mind the gap" sites.

It would not be realistic to allocate these small sites through the JCS given the need for local determination, the timescale for the production of each of the plans and the more detailed work which would be required to produce revised detailed Green Belt boundaries around each smaller release.

Through this paper comparing the Cheltenham Plan sites with the AERC and AMEC reviews there is no parcel of sites assessed by AERC in the Green Belt within Cheltenham Borough which would be of lower sensitivity than the primary Green Belt strategic allocation for the town, which is North West Cheltenham.

There are no suitable Cheltenham Plan sites which could usefully merge with existing JCS allocated sites, or be large enough on their own, and more sustainable than existing allocations in the JCS.

Releasing a scatter of small Green Belt sites which might in combination be of strategic scale is not an appropriate alternative strategy. Such an approach would have a greater impact on the overall openness of the Green Belt, lead to development which is poorly related to existing or proposed development and would not bring with it the same benefits in terms of infrastructure, services and facilities. In short, it would be in fundamental conflict with the strategy of the JCS which is the product of exhaustive consideration over many years of the "right" way to deliver growth in the JCS area.

Any smaller, local Green Belt revisions are properly addressed through the Part 2 Local Plans in accordance with the proposed revised SD6 supported by appropriate local evidence.

The JCS authorities are of the view that the plan as submitted and the approach taken to the review of the Green Belt is sound for a strategic level plan. We are clear that the review of the Green Belt doesn't stop at the JCS and that all sites not allocated in the Core Strategy will and are being reviewed through district plans.