

APPENDIX 5

Cheltenham Borough Plan Part 1 – Issues and Options Consultation

Tewkesbury Borough Council Response

Question	Section	Comments
4-8	3. Cheltenham's Economy	<p>The strategy of the JCS is to concentrate new development in and around the urban areas of Cheltenham and Gloucester, including meeting employment needs. The proposed Strategic Allocations provide locations for new employment growth, however, it is for the Cheltenham Plan to review employment land provision within the existing urban area. It is recognised that the supply of employment land in urban areas is often constrained but that not all existing sites may be suitable for modern business needs. There needs to be a careful balance in considering any changes of use of existing employment sites to non-employment uses to continue to provide a suitable range of employment sites within the town and to support the non-strategic development of employment land.</p>
22	4. Local Green Space	<p>It is noted that there are areas of Local Green Space, which are located within the JCS Strategic Allocation sites at both North West Cheltenham and Leckhampton, which were submitted to the Local Green Space study. Sites submitted to Cheltenham Borough Council through the study have then been identified in this Issues and Options document and are being consulted upon for their suitability for this designation. In considering any Local Green Space designations it is important that it is done within the context of the JCS in terms of meeting the development needs of the area and Strategic Allocations identified.</p> <p>The NPPF guidance on this issue states, at Paragraph 76, that identifying sites should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Furthermore, as the consultation document sets out, the PPG at Part 37 Paragraph 007 states that the designation Local Green Spaces needs to be consistent with local planning for sustainable development in the area and that plans must identify sufficient land to meet development needs and the Local Green Space designations should not be used in a way that undermines this aim of plan making.</p>

APPENDIX 5

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Tewkesbury Borough Council Response

		<p>With this guidance in mind it is important to consider the consistency of any designations with JCS policies and also in the context of the critical contribution that the Strategic Allocation sites are making towards meeting the identified housing and employment needs identified for both Cheltenham and Tewkesbury Boroughs. Designations of Local Green Spaces sought through subsequent plans to the JCS should not undermine the deliverability of these allocations and it is expected that any response made in relation to the areas submitted within the North West Cheltenham and Leckhampton sites through the Cheltenham Plan would not result in a reduction in capacity for development at either of these Strategic Allocations.</p> <p>The NPPF at Paragraph 77 states that Local Green Space designation will not be appropriate for most green areas or open spaces and should only be used where the area concerned is not an extensive tract of land. The Local Green Space areas being consulted on at Leckhampton Fields (Site Ref CP106) and at Swindon Village (Site Ref CP131) cover 46.11ha and 48.47ha respectively. These are substantial areas of land which would appear to be contrary to the guidance set out in the NPPF. In addition the PPG at Part 37, Paragraph 015 states that blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.</p> <p>It is also considered important that any assessment of land at any of the Strategic Allocations should be undertaken on a comprehensive basis and not look at one part of the site in isolation because it falls within the boundary of the Local Authority. This is crucial as to not undermine the deliverability and viability of these JCS strategic cross boundary allocations and particularly relevant in the context of site capacity, location of land uses and infrastructure provision. Tewkesbury Borough Council advised Cheltenham Borough Council at the outset of this process that they would wish to work with Cheltenham Borough Council if the Local Green Space Study seriously intended to consider cross boundary Strategic Allocations. This is particularly important given that Cheltenham’s housing needs are being met in part by Tewkesbury Borough and any reduction in Cheltenham’s capacity in these strategic allocations would need to be met by Cheltenham elsewhere its own administrative boundary.</p>
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APPENDIX 5

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Tewkesbury Borough Council Response

<p>27</p>	<p>5. Site allocations and safeguarding designations</p>	<p>It is noted that there is no indication provided in the document as to whether there are an adequate number of suitable, available and deliverable sites to meet the development needs set out in the JCS. It will be expected that the Cheltenham Plan allocates an adequate number of sites to fully meet its district capacity figure set out in the JCS. It is also noted that none of the sites being consulted on are within the Green Belt or Area of Outstanding Natural Beauty (AONB) are considered to be suitable development. It is not clear how Cheltenham have considered non-strategic sites in the Green Belt or AONB, particularly if there insufficient sites to meet the need for development.</p>
<p>27-33</p>	<p>5. Site allocations and safeguarding designations - Housing Allocations</p>	<p>The Submission JCS identifies a housing requirement of 9,100 dwellings for Cheltenham Borough to 2031. A proportion of this requirement which cannot be met by Cheltenham is being met through urban extensions to Cheltenham which cross the boundary with Tewkesbury Borough with the remainder identified as a ‘district capacity’ of 7,736 dwellings to be allocated through the Cheltenham Plan. It is noted that the consultation document identifies that a significant proportion of this requirement is already committed through consented schemes or is proposed to be built at urban extension sites. However, the document does not provide details of the amount of housing left to be provided in the Borough and therefore it is not clear about the level of housing, from the initial 9,100, that needs be allocated through the Cheltenham Plan.</p> <p>In addition, the document does not indicate the amount of housing that could be potentially accommodated on the sites identified, either per site or globally across the Borough. Therefore it is unclear at this stage whether there are a sufficient number of available, deliverable and suitable sites to meet the identified need for the Borough set out in the JCS. As a result it is unclear as to whether the less preferable sites being consulted upon (coloured amber or red) may be need to be explored further, including those located in the Green Belt and/or AONB, or whether new sites within the Borough need to be brought forward.</p> <p>It is the responsibility of Cheltenham Borough Council to provide a strategy to deliver the development required for their area and as yet it is uncertain how this is being achieved. It will be important for future stages of the plan to demonstrate that there are an adequate number of sites to meet this need.</p>

APPENDIX 5

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Tewkesbury Borough Council Response

34-35	5. Site allocations and safeguarding designations - Gypsy, Traveller and Travelling Showpeople sites	The consultation document does not indicate how the Cheltenham Plan intends to make provisions for GTTS sites. No detail is provided on the need for Cheltenham as set out in the Gloucestershire GTTS Needs Assessment and whether there are adequate sites within the Borough to meet this. It will be important for future stages of the plan to demonstrate that there are an adequate number of sites to meet this need.
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