

Cheltenham Borough Council Planning Committee

Meeting date: 18 January 2024

Meeting time: 6.00 pm

Meeting venue: Council Chamber - Municipal Offices

Membership:

Councillor Paul Baker (Chair), Councillor Garth Barnes (Vice-Chair), Councillor Glenn Andrews, Councillor Adrian Bamford, Councillor Bernard Fisher, Councillor Paul McCloskey, Councillor Emma Nelson, Councillor Tony Oliver, Councillor Diggory Seacome, Councillor Simon Wheeler and Councillor Barbara Clark

Important notice – filming, recording and broadcasting of Council meetings

This meeting will be recorded by the council for live broadcast online at www.cheltenham.gov.uk and <https://www.youtube.com/@cheltenhambc/streams>
The Chair will confirm this at the start of the meeting.

If you participate in the meeting, you consent to being filmed and to the possible use of those images and sound recordings for broadcasting and/or training purposes.

If you have any questions on the issue of filming/recording of meetings, please contact Democratic Services.

Speaking at Planning Committee

To find out more about Planning Committee or to register to speak, please click [here](#).

Please note: the deadline to register to speak is 10.00am on the Wednesday before the meeting.

Contact: democraticservices@cheltenham.gov.uk
Phone: 01242 264 246

Agenda

1 Apologies

2 Declarations of Interest

3 Declarations of independent site visits

4 Minutes of the last meeting (Pages 5 - 10)

To approve the minutes of the meeting held on 14th December 2024..

5 Public Questions

6 Planning Applications

6a 23/01809/FUL 53-57 Rodney Road, Cheltenham GL50 1HX (Pages 11 - 16)

[Planning application documents](#)

6b 21/02828/OUT Unit 22, Lansdown Industrial Estate, Cheltenham, GL51 8PL (Pages 17 - 44)

[Planning application documents](#)

6c 21/02832/OUT Lansdown Industrial Estate, Cheltenham, GL51 8PL (Pages 45 - 292)

[Planning application documents](#)

6d 23/00728/FUL Lansdown Industrial Estate, Cheltenham, GL51 8PL (Pages 293 - 322)

[Planning application documents](#)

7 Appeal Update (Pages 323 - 342)

8 Any other items the Chairman determines urgent and requires a decision

This page is intentionally left blank



Cheltenham Borough Council Planning Committee Minutes

Meeting date: 14 December 2023

Meeting time: 4.00 pm - 5.30 pm

In attendance:

Councillors:

Paul Baker (Chair), Garth Barnes (Vice-Chair), Glenn Andrews, Adrian Bamford, Bernard Fisher, Paul McCloskey, Emma Nelson, Tony Oliver, Diggory Seacome and Simon Wheeler

Also in attendance:

Chris Gomm (Head of Development Management, Enforcement and Compliance), Ben Warren (Planning Officer) and Lucy White (Principal Planning Officer)

1 Apologies

Apologies were received from Councillor Clark.

2 Declarations of Interest

There were none.

3 Declarations of independent site visits

Councillor Fisher declared that he had visited Runnings Road. Members visited sites as part of Planning View.

4 Minutes of the last meeting

Minutes of the meeting held on 16th November were approved and signed as a true record.

5 Public Questions

There were none.

6 Planning Applications

7 23/01691/REM Oakley Farm, Priors Road, Cheltenham, GL52 5AQ

The planning officer introduced the updated report as published with the new recommendation to defer the application.

The planning officer provided the following reason for the application to be deferred:

- The road gradients did not conform with condition 13 and the consultation response from the highways authority.

The Highways officer provided the following points:

- Gloucestershire County Council (GCC) objected to the planning application due to road impact on the local road network, including Priors Road, Harp Hill at mini roundabout and Sainsbury traffic lights. The inspector disagreed and considered that the road impact was overstated and not proven.
- GCC were also concerned about the gradient of the site and gradients of the proposed roads within the site as it doesn't meet the condition and there is concern whether the site would be acceptable for wheelchair users.
- The two options for dealing with the gradient are to either lower the top part of the site or increase the lower end of the site or a combination of both. Both options have impacts on the site.

The matter then went to the vote on the new officer recommendation to defer:

Unanimous – deferred.

8 23/00625/FUL 456 High Street, Cheltenham, GL50 3JA - WITHDRAWN

9 23/01634/FUL 16 Priory Street, Cheltenham, GL52 6DG

The planning officer introduced the report as published.

The following responses were provided to member questions:

- It is proposed to reuse all existing bricks and stones. The condition is for any new bricks that are needed.
- The condition to require lime mortar to be used is due to it being an historic wall as this is what would have been used at the time.
- Trellis work not being replaced is a decision between the landowners. The new wall is acceptable there is no need for an additional trellis as the wall itself is 1.9m. The neighbour could install their own subject to any consent that may be required.

Councillor Andrews declared an interest as a non-executive director of Cheltenham Borough Homes and will abstain from the vote.

The matter went to the vote on the officers recommendation to permit:

For: 9

Abstain: 1

10 23/01669/ADV Unit 3, Runnings Road, Cheltenham, GL51 9NQ

The planning officer introduced the report as published.

The following response was provided to a member question:

- The matter of land ownership is not a material planning consideration. The application is seeking consent for advertisement and doesn't give consent for someone to put something on land that they don't control. The committee are only considering if the merits of the application for the advertisement are acceptable.

The legal officer provided the following response:

- It is the responsibility of the applicant to get the appropriate permission from the land owner to put the sign there. This would be a private matter. The committee can grant consent from a planning perspective if they consider the advertisement appropriate.

The matter then went to the vote on the officer recommendation to grant:

For: 9

Against: 1

11 23/01699/FUL Grosvenor House, 13-19 Evesham Road, Cheltenham, GL52 2AA

The planning officer introduced the report as published.

Councillor Tooke as Ward Councillor made the following points:

- Grosvenor house is not a listed building.
- The proposed changes are to the rear of the building not to the highly visible front of the building.
- The rear is accessed via a dead end road and also has a bin store it is not really used by the public only residents.
- There is precedence of the building already as there is double glazing for the patio and juliet balconies.
- Councillors should be mindful that we are experiencing a cost of living crisis and of the councils objective of achieving net zero as double glazing contributes to this.
- Changes to the historic buildings can be managed when retrofitting double glazing.

The Agent on behalf of the applicant made the following points:

- In 2019 the council declared a climate emergency a subsequent climate emergency action plan document states that the council will help home owners make their homes more energy efficient, the application before you will enable this.
- The works relate purely to the rear of the building and will be the responsibility of the property management company and not the individual flat owners.
- The intention is to install all windows and doors at the same time and not flat by flat. Should planning permission be granted it is anticipated that subject to costs and manufacturer timescales the works would commence next year.
- There are a wide variety of window styles and materials within this part of the conservation area. The new windows will be viewed alongside existing ones with UPVC and aluminium.

Member Debate

In debate, members made the following comments:

- The disrepair of the building and needs updating and it is the rear of the building which the public will not access.
- UPVC is now such quality they look as good as the original we have to do as much as we can for a sustainable future.
- The building was built 20 years ago and see no reason not to grant permission.
- Lack of insulation in homes is a significant cause to climate change and therefore makes sense to grant permission for double glazing.

The matter then went to vote on officers recommendation to refuse:

Against: Unanimous

The Head of Development, Management, Enforcement and Compliance advised members to impose a condition for a timescale for works so that all windows and doors are installed at the same time.

Members agreed to the condition.

The matter then went to vote on permit:

For: Unanimous

12 23/01754/FUL 61 Moorend Park Road, Cheltenham, Glos, GL53 0LG

The planning officer introduced the report as published.

The following responses were provided to member questions:

- The developer is only acting as planning agent on this application.
- The only change is from a pitched roof to flat roof.

The legal officer provided the following response:

- The council cannot impose a condition before a planning breach has been made, the council can only act after a breach has been made.

Member debate

In debate, members made the following points:

- The applicant is getting more light due to the change but the neighbour is not getting as much light even though it passes the light test.

The Head of Development, Management, Enforcement and Compliance provided the response:

- Planning fees are set nationally by regulations, the council does not have any authority to raise statutory fees, only discretionary fees for pre applications. The planning fees have recently increased last week for first time in several years. Also any second application from now on requires the applicant to pay the charge again.

The legal officer provided the following advice:

- The committee is considering this proposal against what is already permitted. With retrospective applications it should still be considered as a fresh application, without reference to the works having already been carried out.

The matter then went to the vote on the officer recommendation to permit:

For: 7

Against: 3

No absentions.

13 Appeal Update

These were noted for information.

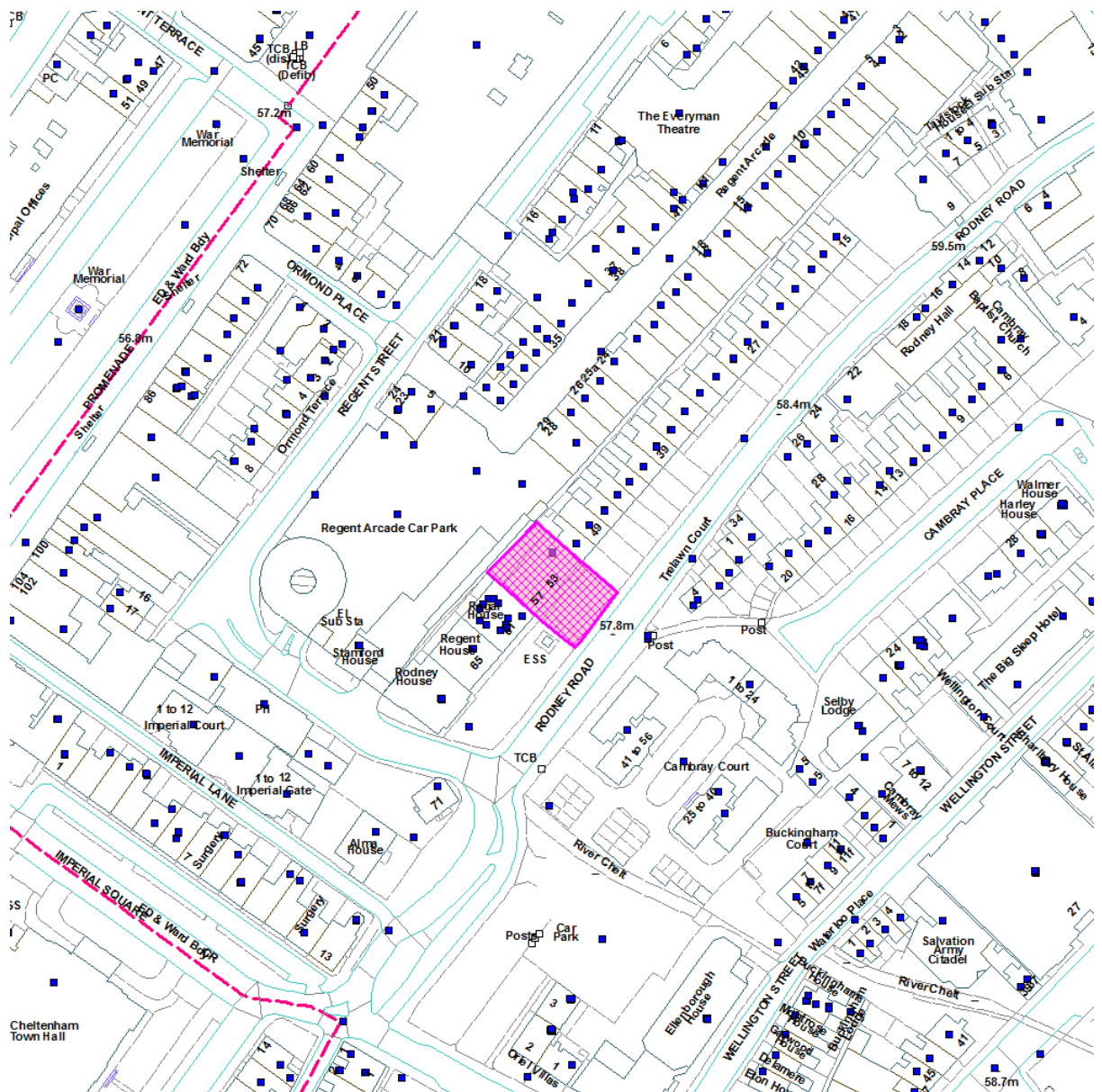
14 Any other items the Chairman determines urgent and requires a decision

There were none.

This page is intentionally left blank

APPLICATION NO: 23/01899/FUL	OFFICER: Mr Ben Warren
DATE REGISTERED: 22nd November 2023	DATE OF EXPIRY: 17th January 2024
DATE VALIDATED: 22nd November 2023	DATE OF SITE VISIT:
WARD: College	PARISH:
APPLICANT:	Cheltenham Borough Council
AGENT:	
LOCATION:	53 - 57 Rodney Road Cheltenham Gloucestershire
PROPOSAL:	Proposed Installation of a collapsible bollard at the entrance to the accessway serving 53-57 Rodney Road

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site relates to 53 – 57 Rodney Road, which are Grade II listed and located within Cheltenham Central Conservation area and Montpelier Character Area. The site is also within Cheltenham's Core Commercial Area.
- 1.2 The applicant is seeking planning permission for the installation of a collapsible bollard at the entrance to the access way serving 53 – 57 Rodney Road.
- 1.3 The application is at planning committee as Cheltenham Borough Council are the applicant and the landowner.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport Safeguarding over 45m
Business Improvement District
Conservation Area
Central Conservation Area
Core Commercial Area
Flood Zone 2
Flood Zone 3
Principal Urban Area
Smoke Control Order

Relevant Planning History:

91/00857/PF 26th September 1991 REF

Alterations To Existing Front Garden Area To Form 3 Car Parking Spaces And Retain A Large Proportion Of Garden

13/01491/CACN 3rd October 2013 NOOBJ

1) London plane at rear car park entrance - crown reduction and thinning. 2) 3 x Sycamores at rear of nos. 53-57 Rodney Road - fell. 3) Sycamore at rear of no. 19 Rodney Road - fell

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development
Section 4 Decision-making
Section 12 Achieving well-designed places
Section 16 Conserving and enhancing the historic environment

Adopted Cheltenham Plan Policies

D1 Design
SL1 Safe and sustainable living

Adopted Joint Core Strategy Policies

SD3 Sustainable Design and Construction
SD4 Design Requirements
SD8 Historic Environment
SD14 Health and Environmental Quality
INF1 Transport Network

Supplementary Planning Guidance/Documents

Central conservation area: Montpelier Character Area and Management Plan (Feb 2007)
Climate Change (2022)

4. CONSULTATIONS

GCC Highways Planning Liaison Officer - 12th December 2023

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection.

The justification for this decision is provided below.

The above application is for the Proposed Installation of a collapsible bollard at the entrance to the accessway serving 53-57 Rodney Road.

The placing of the bollard in the position proposed will result in a vehicle waiting on the highway whilst the bollard is lowered or raised. In some situations this would be considered to result in a highway danger particularly if the access is onto a quick road or with restricted visibility. In this case the access is immediately adjacent to an area where parked cars are frequently found and, with the number of accesses on this section of road manoeuvring vehicles would be expected by drivers including vehicles stopping in the carriageway to parallel park in the on street spaces.

It is therefore considered that the proposed development is unlikely to result in a reduction in highway safety and there are therefore no objections to the proposal on highway grounds.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. There are no justifiable grounds on which an objection could be maintained.

The Highway Authority therefore submits a response of no objection.

Building Control - 11th December 2023

No comment

Heritage And Conservation - 8th December 2023

Relevant legislation and policies

Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act).

The National Planning Policy Framework (DLUHC: 2023) (the framework).

Policy SD8 (Historic Environment) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2013 (adopted December 2017) (the JCS).

Consideration

The description of the scheme reads: Proposed Installation of a collapsible bollard at the entrance to the accessway serving 53-57 Rodney Road.

The consideration of the scheme is undertaken as a desk-based assessment.

In the appraisal of planning applications, the 1990 Act requires via S.66 (1) 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

S.72 (1) of the 1990 Act requires that in the exercise of planning functions 'with respect to any buildings or other land in a conservation area' special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'

These duties are reflected in section 16 (Conserving and enhancing the historic environment) of the framework.

The framework defines the setting of a heritage asset as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (Annex 2: Glossary).

No. 57 is included on the National Heritage List for England (the NHLE) at Grade II. First listed on 12 March 1955. List entry number: 1387778 (number 57 and attached area railings).

Nos. 15-55 Rodney Road are included on the NHLE at Grade II. First listed on 12 March 1955. List entry number: 1387776 (Rodney Terrace and attached area railings).

The significance of the subject buildings lies principally, though not entirely, in their architectural value as examples of domestic architecture from c. the first half of the nineteenth century.

The proposal site is located in the Central Conservation Area, a designated heritage asset (Cheltenham's Central Conservation Area was designated by Gloucestershire County Council on 28 May 1973 and its boundary was extended by Cheltenham Borough Council on 14 August 1987).

The proposed installation will not detract from the setting of the listed building(s) or the character and appearance of the conservation area. Given this, the proposed scheme is acceptable in terms of conservation.

5. PUBLICITY AND REPRESENTATIONS

- 5.1 The application was advertised by way of a site notice and an advert published in the Gloucestershire Echo. No letters of representation have been received in response to this notification process.

6. OFFICER COMMENTS

6.1 Determining Issues

- 6.2 The main considerations in relation to this application are the design, impact on the designated heritage assets, the impact of the proposal on neighbouring amenity and highway safety.

6.3 Design and impact on heritage assets

- 6.4 Policy SD8 of the JCS relates to the historic environment and states how 'Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance'. Section 16 of the NPPF also echoes the importance of conserving and enhancing heritage assets.

- 6.5 The application seeks consent for the installation of a collapsible bollard on the access way serving 53 – 57 Rodney Road. The application site is Grade II listed, as such, the council's conservation officer has been consulted on this application, and their detailed comments can be read in section 4 above.
- 6.6 The conservation officer raises no concerns with regards to the impact of the proposed work on the designated heritage assets, including the setting of the listed buildings and the wider conservation area. Officers consider the bollard to be a typical design and form for its intended purpose.
- 6.7 The works are considered to be acceptable in terms of design and the impact on the designated heritage assets, as such, the proposal is compliant with the requirements of the Adopted Cheltenham Plan (2020) policy D1 and adopted JCS policies SD4 and SD8.
- 6.8 **Impact on neighbouring property**
- 6.9 It is necessary to consider the impact of development on neighbouring amenity. JCS Policy SD14 and Cheltenham Plan Policy SL1 state how development should not cause unacceptable harm to the amenity of neighbouring properties. Matters such as a potential loss of light, loss of privacy, loss of outlook, noise disturbances and overbearing impact will therefore be considered.
- 6.10 The proposal raises no concerns with regards to impact on neighbouring amenity and no concerns have been raised in response to the neighbour consultation process. The development therefore accords with Adopted Cheltenham Plan (2020) policy SL1 and adopted JCS policy SD14.
- 6.11 **Highways safety**
- 6.12 Gloucestershire County Council as the local highway's authority has been consulted on this application, their detailed comments can be read in section 4 above. The highways officer concludes that there are no justifiable grounds to maintain an objection to the works in terms of highway safety. The proposal accords with JCS policy INF1.

Other considerations

- 6.13 *Climate change*
- 6.14 JCS policy SD3 requires new development to be designed and constructed to maximise the principles of sustainability. Development proposals are required to demonstrate how they contribute to the aims of sustainability and shall be adaptable to climate change in respect of the design, siting, orientation and function of buildings and outside space. The Cheltenham Climate Change SPD (adopted June 2022), sets out a strategy for decarbonising buildings over the next decade.

In this instance the application relates to the addition of a bollard within the highway, with no scope to include specific low carbon technologies or measures to combat climate change. Given the nature of the works, this is acceptable.

- 6.15 *Public Sector Equalities Duty (PSED)*

As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;

- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have “regard to” and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

In the context of the above PSED duties, this proposal is considered to be acceptable

7. CONCLUSION AND RECOMMENDATION

- 7.1 No objection or concerns are raised from a heritage perspective, the application is considered to be acceptable in terms of impact on neighbouring amenity and highway safety. As such, officer recommendation is to grant planning permission subject to the conditions set out below;

8. CONDITIONS / INFORMATIVES

- 1 The planning permission hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

APPLICATION NO: 21/02828/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 5th January 2022	DATE OF EXPIRY: 2nd March 2022/Agreed Ext of Time 20 th November 2023
DATE VALIDATED: 5th January 2022	DATE OF SITE VISIT:
WARD: St Marks	PARISH:
APPLICANT:	Cheshire West And Chester Council
AGENT:	SF Planning Limited
LOCATION:	Unit 22 Lansdown Industrial Estate Gloucester Road
PROPOSAL:	Outline application for mixed use redevelopment at Units 23 and 30 Lansdown Industrial Estate (residential and commercial) with all matters reserved apart from access, following demolition of existing buildings

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site comprises of 2no. industrial buildings (known as Units 23 and 30) located within the southern half of the Lansdown Industrial Estate (LIE). The larger of the two units, No 23, is two storeys in height, fronts Roman Road and is attached, on its north side, to a row of terraced residential properties. Unit 30 is single storey and detached and located to the rear of Unit 23. The section of Unit 23 fronting Roman Road has been vacant for some years; the remaining half accommodates the management offices for LIE. Unit 30 is also currently in commercial use.
- 1.2 The site is located within the Principal Urban Area and outside of the conservation area. Surrounding development is a mix of commercial and residential, with Gloucester Road and Cheltenham Spa train station to the south and west, the railway line to the east and the northern half of LIE and Rowanfield further north and west. The main pedestrian and vehicular access to the site is via Gloucester Road with a secondary pedestrian access to Unit 23 via Roman Road.
- 1.3 The southern half of LIE contains a range of industrial/commercial buildings of various sizes, architectural style and age and accommodates roughly 40% of the floor area of the entire estate. The majority of the buildings are or were last used for traditional employment purposes (Classes E (old B1), B2 and B8) but there are other commercial activities including a micro-brewery and food and drink businesses. Building occupancy rates are generally high within the southern half of the estate, with some tenants under long lease arrangements.
- 1.4 The application site also falls within the area covered by Policy MD1 of the Cheltenham Plan (CP), which is a site specific policy relating to Lansdown Industrial Estate. The site specific requirements of this policy are an employment led regeneration of LIE which may include an element of residential development, provided that existing provision is offset by a net gain in the quality and/or number of jobs provided on the site.
- 1.5 The application seeks outline planning permission for a mixed use redevelopment scheme at Units 23 and 30 Lansdown Industrial Estate (residential and commercial). All matters are reserved except for the proposed means of access to the site. Matters relating to appearance, scale, layout and landscaping are therefore reserved for future consideration.
- 1.6 Although matters relating to layout, design, appearance and landscaping are reserved, the applicant has provided a Parameters Plan which indicates the proposed location and mix of uses within the development, alongside access arrangements. In addition, the submitted Design and Access statement provides an illustrative layout and indicative images of the proposed building types. This shows the potential construction of 3no. attached buildings, of up to three storeys in height, accommodating 5no. apartments fronting Roman Road and 2no. commercial units to the rear. Parking for both the residential and commercial elements (including allocated parking for the proposed dwellings) is shown to the rear/side of the new commercial building(s). A new pedestrian and cycle path link between Roman Road and the industrial estate is also proposed.
- 1.7 An application seeking outline planning permission for the erection of up to 215 dwellings following the demolition of all existing buildings within the northern half of LIE is also being considered by the Council (ref 21/002832/OUT) and in conjunction with this application. Similarly, an application for the erection of a new artists studios building within the southern half of the estate is being considered alongside the larger residential scheme application (ref 23/00278/FUL).
- 1.8 This application has, in part, been submitted by the applicant to address the requirements of CP Policy MD1. Matters relating to Policy MD1 and the interrelationship with the larger residential scheme application are discussed later in the report.

- 1.9** Therefore, this application is before the Planning Committee because the proposals form part of the considerations of the larger residential scheme proposals, the reasons for which are set out within the officer report for application 21/02832/OUT.
- 1.10** Regardless of all three applications being considered together and their shared policy considerations, Members must determine this application on its individual merits and independently of any decision made in respect of application 21/02832/OUT. Any required implementation of the subject application would be dealt with by way of s106 obligations in respect of application 21/02832/OUT.
- 1.11** To assist Members, all consultee responses are reproduced in full at the end of the report and a summary is provided of the concerns raised by local residents. The key issues relating to this application are set out in section 6 of the report and each are discussed in broad terms, alongside the national and local planning policy context.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Land Allocated for Mixed Use
Airport safeguarding over 15m
Principal Urban Area

Relevant Planning History:

69/00192/PF 15th July 1969 PER

Block 22 Cheltenham Gloucestershire - Change Of Use Of Build. From Offices (Use Class li) To Use Of Part Premises As Light Indust. Build. (Use Class lii)(Electronic Instrum. Assem) and Use Of Part Prem. As Offices (Use Class li)

84/00037/PF 20th April 1984 PER

Block 22 Cheltenham Gloucestershire - Erection Of Emergency Generator And Compressor Housing

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development
Section 4 Decision-making
Section 5 Delivering a sufficient supply of homes
Section 8 Promoting healthy and safe communities
Section 9 Promoting sustainable transport
Section 11 Making effective use of land
Section 12 Achieving well-designed places
Section 14 Meeting the challenge of climate change, flooding and coastal change

Adopted Cheltenham Plan Policies

EM2 Safeguarding Non-Designated Existing Employment Land and Buildings
D1 Design
SL1 Safe and Sustainable Living
GI2 Protection and replacement of trees
GI3 Trees and Development
CI1 Securing community infrastructure benefits

Adopted Joint Core Strategy Policies

SP1 The Need for New Development
SP2 Distribution of New Development

- SD3 Sustainable Design and Construction
- SD4 Design Requirements
- SD9 Biodiversity and Geodiversity
- SD10 Residential Development
- SD11 Housing Mix and Standards
- SD12 Affordable Housing
- SD14 Health and Environmental Quality
- INF1 Transport Network
- INF2 Flood Risk Management
- INF3 Green Infrastructure
- INF4 Social and Community Infrastructure
- INF5 Renewable Energy/Low Carbon Energy Development
- INF6 Infrastructure Delivery
- INF7 Developer Contributions

Supplementary Planning Guidance/Documents

Development on garden land and infill sites in Cheltenham (2009)
Cheltenham Climate Change (2022)

4. CONSULTATIONS

See appendix at end of report

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	29
Total comments received	6
Number of objections	4
Number of supporting	1
General comment	1

5.1 The application was advertised by way of 29 letters sent to neighbouring properties and businesses. During the course of the application a total of 6 third party representations were received, the majority in objection to the proposed development.

5.2 All of the comments have been made available to Members separately but the main comments and concerns raised are summarised as follows:

- Existing building detract from the area and its replacement is therefore welcomed.
- Cycle parking must be designed into the scheme at an early stage
- Should planning permission be granted for the larger residential scheme in the northern part of the industrial estate, it should be tied by s106 Agreement to suitable commercial refurbishment/redevelopment in the southern half
- Proposed 3.5 metre wall at the rear of adjacent garden should be compared to what is normally found at the end of garden, namely a 2m fence.
- Roof form and height of the commercial building may need to be amended to prevent harm to the amenity of neighbouring dwellings
- Proposed commercial building would result in loss of light and obscure outlook from rear of adjacent dwelling which would be surrounded by high brick walls
- Cycle and pedestrian route is welcomed
- No detail of party wall removal provided
- Cycle and parking provision inadequate
- Proposed cycle/pedestrian path would result in loss of existing street parking and increase anti-social behaviours
- Potential for seagulls to nest of flat roof

6. OFFICER COMMENTS

6.1 Determining Issues

6.2 The key issues (in no particular order of importance) for consideration are:-

- The Policy Framework and Principle of Development/Loss of Employment Land
- Access, Parking and Highway Safety
- Design and Layout (indicative only)
- Impact on neighbouring amenity
- Sustainability and Climate Change
- Drainage and Flood Risk
- Ecology/Biodiversity and Green Infrastructure
- Links with application 21/02828/OUT and s106 Obligations

6.3 Policy Framework and Principle of Development

6.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. This is reiterated in NPPF paragraph 47.

6.5 The development plan comprises of the saved policies of the Cheltenham Borough Local Plan Second Review 2006 (CBLP), adopted policies of the Cheltenham Plan 2020 (CP) and the Tewkesbury, Gloucester and Cheltenham Joint Core Strategy 2017 (JCS). Other material considerations include the National Planning Policy Framework 2023 (NPPF), and Planning Practice Guidance (nPPG).

6.6 Policies EM1, EM2, H2, MD1, D1, SL1, CI1 and CI2 of the Cheltenham Plan and policies SP1, SP2, INF1, INF2, SD3, SD4, SD10 and SD14 of the JCS are most relevant.

6.7 JCS policy SD10 advises that housing development will be permitted at sites allocated for housing through the development plan, including Strategic Allocations and allocations in district and neighbourhood plans. On sites that are not allocated, housing development will be permitted on previously developed land within the Principal Urban Area of Cheltenham except where otherwise restricted by policies within the District Plans. The application site constitutes previously-developed land and is located within the PUA. Therefore, the general principle of residential development on this site must be considered acceptable. However, the extent of residential development on this site is restricted by CP Policy MD1, discussed below.

6.8 Paragraph 11 of the NPPF states '*Plans and decisions should apply a presumption in favour of sustainable development....and for decision making this means approving development proposals that accord with an up-to-date development plan*'. Where policies which are most important for determining the application are out-of-date, the NPPF at paragraph 11(d) advises that planning permission should be granted '*(i) unless the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*'. This is referred to as the 'tilted balance' and the government's approach to ensuring delivery of housing nationally.

6.9 Footnote 7 of paragraph 11 of the NPPF explains further that for applications involving the provision of housing, relevant policies must be considered out of date in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing.

- 6.10** Cheltenham Borough Council is currently unable to demonstrate a five-year supply of housing land. As such, the contribution of the proposed dwellings towards alleviating the housing land supply shortfall carries weight and is a material consideration in the determination of this planning application.
- 6.11** Notwithstanding the above, the objectives of CP Policy MD1 and the site specific issues and merits of the proposed development all require careful consideration in order to determine whether the proposals are acceptable overall. This will include consideration of the wider implications for the retained employment use at the industrial estate, the proposed (indicative) design, layout and scale of the proposed development and their impacts upon the character and appearance of the locality, highway safety and any potential impact upon the amenities of neighbouring land users.
- 6.12** Employment Land/Policy MD1
- 6.13** Lansdown Industrial Estate is not identified as key employment site within the Borough, therefore CP Policy EM1 is not relevant.
- 6.14** Policy H2 of the Cheltenham Plan allocates a number of sites for mixed-use development, including LIE. Each allocation is supported by a site-specific policy which provides further guidance and in this case CP Policy MD1 is relevant.
- 6.15** The application site falls within the area covered by CP Policy MD1. The site specific requirements of the policy are an employment led regeneration of LIE which may include an element of residential development, provided that existing provision is offset by a net gain in the quality and/or number of jobs provided on the site. The policy reads as follows:

POLICY MD1: LANSDOWN INDUSTRIAL ESTATE

Site description

The site is capable of redevelopment for mixed-use, including a continued element of employment in better-quality units together with some new residential development. There would be a net loss of employment land but this should be offset by an upgrade in the quality and density of premises.

Site area 5.5ha

Constraints • Contaminated land

• Highways access

Site specific requirements

- Employment led regeneration which may include an element of residential development provided that existing provision is offset by a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site*
- Measures to mitigate the impact of noise and vibration caused by railway line*
- Safe, easy and convenient pedestrian and cycle links within the site and to key centres*
- A layout and form that respects the existing urban characteristics of the vicinity*

- 6.16** The application proposes a mixed use redevelopment of the site to include both residential and commercial uses. The proposals form part of an applicant strategy to

identify areas for improvement within the industrial estate (applicant) ownership boundary. Given the indicative amount of residential use proposed the proposals are considered to adhere to the objectives of Policy MD1. Whilst MD1 does not preclude residential use and purposely, does not prescribe a quantum or percentage for the residential element, the clear objective of the policy is to retain substantive employment use at LIE. The proposed development achieves this when considering the retention of employment use across the southern half of the industrial estate and the potential for the existing provision to be offset by a net gain in the quality and/or jobs provided on site. In addition, the proposals include a new pedestrian and cycle link which would provide a better and safer connection between the industrial estate and the local area.

- 6.17** In addition to MD1, Policy EM2 of the Cheltenham Plan is also relevant in that it seeks to retain land and buildings currently or last in employment use across the Borough. It states that development proposals for a change of use of land and buildings currently or last in employment use will only be permitted where certain criteria are met.
- 6.18** In support of the proposals and seeking justification for the (partial) loss of employment land, the applicant appears to be relying on Criteria (b)(i) and (iii) of EM2 in that *'the loss of the site to other uses does not have a detrimental impact on the continuing operation of existing businesses within the vicinity and the proposed use is job-generating, with any loss offset by a net gain in the quality and/or number of jobs provided on site.* Furthermore the applicant claims that despite an active marketing campaign, there has been a sustained and long-term absence of economic activity on part of the application site (unit fronting Roman Road) and given its age, condition and layout there is little long term prospect of this building being used beneficially, for employment purposes.
- 6.19** In essence, the quality of the two purpose built commercial units proposed, would offset the loss of the existing poorer quality and vacant industrial buildings.

6.20 Design and layout/Neighbouring Amenity

- 6.21** Section 12 of the NPPF sets out that good design is a key aspect to achieving sustainable development and creating better places to in which to live. Similarly, Policy SD4 of the JCS require development to respond positively to and respect the character of the site and its surroundings. These objectives are reiterated in Policy D1 of the Cheltenham Plan which requires development to achieve a high standard of architectural design that complements neighbouring development.
- 6.22** Section 12 of the NPPF also requires development to create places with a high standard of amenity for existing and future users. Policy SL1 of the Cheltenham Plan advises that development will only be permitted where it will not cause unacceptable harm to the amenity of adjoining land users or the locality. In assessing impact on amenity, the Council will take account of matters including, but not limited to, loss of privacy, light and outlook. The policy is consistent with adopted JCS policy SD14.
- 6.23** As discussed in the introduction, the Parameter Plan and Design and Access Statement (DAS) provide some detail on the indicative layout, scale and massing of the proposed buildings, including the new pedestrian/cycle path.
- 6.24** Whilst recognising that the proposed development would reinstate a residential frontage to Roman Road, officers have concerns over the potential height and massing of the apartment and commercial buildings which are shown abutting the boundary and rear garden of No 7 Roman Road, which is considered to be the property most affected by the proposals. That said, all of the comments and concerns raised by local residents are noted and have been considered very carefully by officers in reaching their recommendation.

- 6.25** The Parameter Plan indicates a ridge height of up to 12 metres (11m eaves height) for the residential element and a 5m ridge height and 3.5m eaves height for the commercial building. Whilst it is acknowledged that No 7 has been extended at the rear in the form of two storey addition and the amenity of the occupiers of this neighbouring property is somewhat compromised currently by the height and bulk of the adjacent existing buildings, officers consider that there would be no compelling reason to allow a scheme that would perpetuate or worsen a harmful relationship between neighbouring properties.
- 6.26** There are also concerns about the location and accessibility of the proposed parking area for the flats. That said, this is an outline application with matters relating to design, scale, layout and appearance reserved. The scale, form, layout and massing of the buildings and their curtilages and impacts on amenity and access could therefore be considered appropriately at REM stage.
- 6.27** However, in light of the neighbour amenity concerns, a condition is suggested which restricts the height/storeys of both the residential and commercial elements; a limit of two storeys (or roof height no greater than that of the existing building fronting Roman Road) for the residential building and single storey (with 3m eaves height) for the commercial building(s) at the rear.
- 6.28** The side elevation treatment and scale of any building fronting Roman Road and how this might impact on users of the pedestrian/cycle path to the side would also be considered at REM stage. Similarly, there would be opportunities for the new commercial building(s) frontage and elevations to enhance the appearance of the main entrance area into the estate. Hard and soft landscaping opportunities and the requirement for the detailed scheme to achieve biodiversity net gain, would also be considered at a later stage and secured by planning condition.
- 6.29** For the above reasons, and subject to the inclusion of the above conditions, the proposals are considered to be in accordance with the objectives and policy guidance of sections 8 and 12 of the NPPF (2023), Policies D1 and SL1 of the Cheltenham Plan and policies SD4 and SD14 of the JCS.
- 6.30 Access and highway issues**
- 6.31** Paragraph 11 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Policy INF1 of the JCS reiterates the stance of the NPPF and states that proposals should ensure that safe and efficient access to the highway network is provided for all transport modes.
- 6.32** The proposed development would be accessed via Roman Road, Gloucester Road and the internal estate road. The indicative layout shows 5no. allocated parking area/spaces for the proposed residential use and 3no. parking spaces for the commercial use, located at the rear of the site and accessed from within the industrial estate.
- 6.33** The proposals also include a new pedestrian/cycle path link between Roman Road and the industrial estate. This path would connect with existing routes within the industrial estate and to new pathways proposed as part of the larger residential scheme for the northern half of the estate, application 21/02832/OUT. It would also improve access to Cheltenham Spa Station and the Honeybourne Line.
- 6.34** The Highway Authority (HA) has assessed the proposals based on the indicative layout and quantum of development/uses. In summary, the HA finds that the proposals would likely lead to a reduction in trip rates when compared to the existing commercial floor space and as such should not result in any safety or capacity concerns in respect of the local highway network. Similarly, the proposed pedestrian link to Roman Road is

considered a reasonable form of mitigation to address an otherwise lack of segregated pedestrian facilities along the main estate road.

6.35 In conclusion, the HA concludes that the proposals would not result in an unacceptable impact on highway safety or a severe impact on congestion and there are no justifiable grounds on which an objection could be maintained. The HA's suggested conditions have been added and further conditions relating to the implementation of the proposed access and pedestrian/cycle path, and parking and cycle storage provision are also included.

6.36 The HA's comments are set out in full at the end of the report.

6.37 Sustainability

6.38 Policy SD3 of the JCS requires all new development to be designed to contribute to the aims of sustainability by increasing energy efficiency and minimising waste and air pollution. Development proposals are also required to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings. Similarly, Policy INF5 of the JCS sets out that proposals for the generation of energy from renewable resources or low carbon energy development will be supported.

6.39 The Cheltenham Climate Change SPD (adopted June 2022), sets out a strategy for decarbonising buildings over the next decade. For all new development there is an opportunity to improve the environmental performance of buildings through the inclusion of technologies and features such as photovoltaics, heat recovery, permeable (or minimal) hard surfaces, fabric first design approach, insulation renewable and appropriately sourced materials and alternative heating systems.

6.40 The application was submitted prior to the SPD adoption in 2022 and therefore without a requirement for a Sustainability Statement. On submission, the application details lacked information on Climate Change and the incorporation of low carbon measures. The applicant was subsequently asked to provide a Sustainability Statement/Checklist to address the SPD. The submitted Strategy sets out the applicant's proposed approach to sustainable design and measures to reduce carbon emissions, as follows:-

- Passive design principles will be utilized to maximise solar gain, natural daylighting and ventilation and shading. Building orientation and footprint will be optimised accordingly.
- Use of renewable energy (likely ASHPs throughout), high levels of insulation and thermal bridge minimization
- Fossil fuel free development i.e. non-gas heating strategy with likely low carbon air source heat pumps (ASHPs) installed throughout
- Roof mounted solar PV panels
- Priority for water efficiency measures to be incorporated into building fixtures and fittings
- Interim Travel Plan submitted – encourages shared mobility and home office provision plus new cycle and pedestrian routes
- EV charging points provided for all new dwellings/commercial units

- Space allocated for waste, recycling and composting in accordance with the Gloucestershire Waste Core Strategy (GWCS) and SPD. The submitted Waste Minimisation Statement identifies specific measures to minimise consumption and waste generation during the construction and operational stages

- 6.41** Note that, this is an outline planning application and as such, the applicant comments that as the design progresses, further energy (SAP) modelling/calculations will help scale renewable systems to get as close to net zero as is feasible, taking into account the site location and planning considerations. For example, detailed roof designs, embodied carbon minimisation and renewables feasibility assessments have not yet been completed. Exact specifications on renewables, generation capacity and percentage of offsets of predicted total energy consumption have also not been finalised.
- 6.42** The proposed strategy is welcomed and overall, should reduce energy demand and CO2 emissions beyond Building Regulations Part L. In this respect, the applicant has utilised the SPD effectively at this early stage to seek enhancements to the sustainability and low carbon approach to this development.
- 6.43** In light of the above and given that this is an outline planning application, officers consider it reasonable to add a condition to ensure that the development is carried out in accordance with measures set out in an updated Sustainability and Energy Statement which shall be submitted to and agreed in writing by the local planning authority as part of the first reserved matters application. A condition requiring that there shall be no gas supply connection to any part of the proposed development is also included.

6.44 Other considerations

- 6.45** Habitats Regulations Assessment/Cotswold Beechwoods Special Area of Conservation (SAC)
- 6.46** Policy BG1 of the Cheltenham Plan states that development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the European Site network (alone or in combination), and the effects cannot be mitigated. Therefore, in order to retain the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) all development within the borough that leads to a net increase in dwellings will be required to mitigate any adverse effects.
- 6.47** This planning application was validated on 5th January 2022. Natural England has stated in its letter to Councils of 9 September 2022 that the Cotswolds Beechwoods SAC Mitigation Strategy of May 2022 should apply to relevant applications (constituting habitat development) submitted on or after the 1st November 2022. Accordingly, Members should note that SAC mitigation in the form of a financial contribution is not being sought for this development at either outline or REM stage.
- 6.48** Notwithstanding the above, alternative mitigation for recreational pressures on the Beechwoods SAC could be provided in the form of a homeowner pack/information leaflet issued to all first occupiers of the proposed dwellings. This would both educate and raise awareness of the SAC and list other recreation opportunities locally and further afield. A condition has been attached accordingly.
- 6.49** S106 Obligation/Planning Application 21/02832/OUT
- 6.50** As discussed in the report introduction, in order to address the requirements of Policy MD1, the s106 in respect of application 21/02832/OUT (should planning permission be granted), would need to include an obligation requiring the implementation and completion

of this mixed use development alongside the delivery of the larger residential scheme. The drafting of the s106 obligations is still in progress, but it is likely that various trigger points would be set for the commencement and completion of construction work on the mixed use scheme and associated completion/occupation of a certain number of new dwellings within the southern half of the estate.

6.51 Public Sector Equalities Duty (PSED)

6.52 As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have “due regard” to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

6.53 Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have “regard to” and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

6.54 In the context of the above PSED duties, this proposal is considered to be acceptable.

7. CONCLUSION AND RECOMMENDATION

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise.

7.2 The relevant policies of the development plan currently in force are out of date due to a shortfall in the five-year supply of housing land. The proposal has therefore been assessed against the guidance contained within the NPPF. Paragraph 11(d) of the NPPF applies a presumption in favour of sustainable development unless:-

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.

7.3 The application site is located within the PUA and within the site area covered by CP Policy MD1. As such, and notwithstanding the shortfall in the Council’s housing land supply (HLS), the principle of developing the site for residential purposes remains acceptable.

7.4 In carrying out an objective assessment of the proposals (in line with NPPF paragraph 11d), officers have had to balance any potential adverse impacts of the proposals on the character of the site and wider locality, any implications associated with conflicts with Policy MD1/loss of employment land, the amenities of neighbouring land users and highway safety implications, against the positive contribution the proposal would make towards HLS and any wider economic or social benefits that the scheme might bring. In this regard, the contribution of A small number of (indicatively 5no.) market dwellings towards meeting the Council’s identified housing needs weighs in favour of the proposals.

- 7.5** The proposals adhere broadly to the objectives of CP Policies MD1 and EM2. The loss of the existing industrial buildings to a mixed residential and commercial use would not have a detrimental impact on the continuing operation of existing businesses within the vicinity and the proposed use, in part, is job-generating. Furthermore, the employment loss is considered offset by a net gain in the quality and/or number of jobs that could be provided on the site.
- 7.6** The indicative layout also incorporates green infrastructure, improvements to the appearance of the industrial estate/public realm, and a new pedestrian and cycle route with connectivity to surrounding pathways and local areas.
- 7.7** The potential for harm to the amenities of neighbouring land users and those of future occupiers of the development would be considered further at the detailed, reserved matters stage. Nonetheless, conditions are added which restrict the height of any future buildings and require the submission of a noise impact assessment.
- 7.8** Similarly, there are no highway safety concerns associated with the proposed development.
- 7.9** Officers have taken account of the social, economic and environmental benefits of the proposals and having assessed the proposals in accordance with NPPF paragraph 11(d), the 'tilted balance' in favour of sustainable development is engaged in this case and there are no other adverse impacts arising from the proposals that would significantly outweigh the benefits of the scheme and substantiate a refusal.
- 7.10** The recommendation is therefore to grant outline planning permission, subject to the following conditions.
- 7.11** The applicant has agreed to the terms of the pre-commencement condition.

8. CONDITIONS / INFORMATIVES

- 1 The outline planning permission hereby granted shall be begun not later than the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason: To accord with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 Application(s) for approval of the reserved matters must be made not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 3 Applications for approval of reserved matters shall be in general accordance with the submitted Parameter Plan (drawing LDR-AHR-RO-XX-DR-A-93-000 P03).

Notwithstanding the submitted details, the proposed residential use/building(s) fronting Roman Road shall not exceed two storeys in height or the roof height of the existing two storey building on the site, whichever is the greater. Notwithstanding the submitted details, the proposed commercial use/building(s) shall not exceed one storey in height and shall have an eaves height of no more than 3 metres.

Reason: In the interests of the character and appearance of the area and amenities of neighbouring land users and to ensure the development accords with the required principles and standards of urban design, having regard to adopted policies D1 and SL1 of the Cheltenham Plan (2020) and adopted policies SD4 and SD14 of the Joint Core Strategy (2017).

- 4 The reserved matters required to be submitted and approved under Condition 1 shall include:

- (i) details of the design, form and architectural features of the buildings
- (ii) details (to include elevation drawings) of the position, design, materials and type of boundary walls, fences and any other means of boundary enclosure
- (iii) details of cycle storage facilities for each dwelling and commercial unit;
- (iv) details of refuse and recycling storage for each dwelling and commercial unit;
- (v) details of external lighting (including security lighting)
- (vi) details of the pedestrian and cycle link (including surfacing material and external lighting of this area)
- (vii) details for hard and soft landscaping (to include details of biodiversity net gain (BNG), in accordance with Natural England's Biodiversity Metric 3.0).

The development shall be carried out in accordance with the approved details.

Reason: In the interests of the character and appearance of the area, having regard to adopted policy D1 of the Cheltenham Plan (2020) and adopted policy SD4 of the Joint Core Strategy (2017).

- 5 No external facing or roofing materials shall be applied unless in accordance with:
- a) a written specification of the materials; and/or
 - b) physical sample(s) of the materials.
- The details of which shall have first been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the area, having regard to adopted policy D1 of the Cheltenham Plan (2020) and adopted policy SD4 of the Joint Core Strategy (2017).

- 6 Prior to the commencement of development, a surface water drainage scheme, which shall incorporate Sustainable Urban Drainage System (SUDS) principles, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include a programme for implementation of the works; and proposals for maintenance and management. The development shall not be carried out unless in accordance with the approved surface water drainage scheme.

Reason: To ensure sustainable drainage of the development, having regard to adopted policy INF2 of the Joint Core Strategy (2017). Approval is required upfront because the design of the drainage is an integral part of the development and its acceptability.

- 7 Prior to the commencement of development, a site investigation and risk assessment shall be carried out to assess the potential nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11 and shall include:
- a) a survey of the extent, scale and nature of contamination
 - b) an assessment of the potential risks to:
 - human health

- property (including buildings, crops, livestock, pets, woodland and service lines and pipes)
 - adjoining land
 - ecological systems
 - groundwaters and surface water
 - archaeological sites and ancient monuments
- c) an appraisal of remedial options to mitigate against any potentially significant risks identified from the risk assessment.

Where remediation is required, a detailed remediation scheme to bring the site to a condition suitable for the intended use shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme shall ensure that the site will not qualify as contaminated land under Part 2a of the Environmental Protection Act (1990) in relation to the intended use of the land after remediation.

The site investigation, risk assessment report, and proposed remediation scheme shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with adopted policy SD14 of the Joint Core Strategy (2017).

- 8 In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority and development shall be halted on that part of the site affected by the unexpected contamination. An investigation and risk assessment must then be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11 and a remediation scheme, where necessary, also submitted. Following completion of measures identified in the approved remediation scheme, a verification report shall be submitted to and approved in writing by the Local Planning Authority before development can recommence on the part of the site identified as having unexpected contamination.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with adopted policy SD14 of the Joint Core Strategy (2017).

- 9 Prior to the commencement of development an Environmental Noise Assessment shall be carried out and submitted to the local planning authority. The assessment shall consider the noise and environmental impacts of the proposed and nearby commercial and industrial uses on the proposed and adjacent, existing residential properties and shall include detailed façade/fenestration specifications for the proposed dwellings, where necessary.

Any approved noise mitigation measures shall be installed in full prior to first occupation of the proposed dwellings and retained thereafter for the lifetime of the development.

Reason: To safeguard the amenity of adjacent properties and the general locality, having regard to adopted policy SL1 of the Cheltenham Plan (2020) and adopted policy SD14 of the Joint Core Strategy (2017).

- 10 No piling activities shall be carried out at this site until a full pile method statement has been submitted to and approved in writing by the Local Planning Authority. The method statement must assess and include full details of the noise and vibration impact from the piling operations on the nearest residential property, dates and times of piling and details of monitoring measures. All piling activities shall be carried out in accordance with the approved details.

Reason: To safeguard the amenity of adjacent properties and the general locality, having regard to adopted policy SL1 of the Cheltenham Plan (2020) and adopted policy SD14 of the Joint Core Strategy (2017).

- 11 Prior to the commencement of development a Construction Traffic Environmental Management Plan (CTEMP) shall be submitted to and approved in writing by the Local Planning Authority. The approved CTEMP shall be adhered to throughout the site preparation, demolition and construction periods unless the Local Planning Authority gives prior written permission for any variation. The plans/statements shall include but shall not be restricted to:

- Parking of vehicles of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);
- Advisory routes for construction traffic;
- Types, size and numbers of construction related vehicles anticipated daily including arrangements to receive abnormal loads or unusually large vehicles;
- Any temporary access into the site;
- Locations for loading/unloading and storage of plant, waste and construction materials;
- Method of preventing mud and dust being carried onto the highway;
- Measures for the control of noise, dust and other air borne pollutants during works of demolition and construction;
- Wheel washing facilities;
- Arrangements for turning vehicles;
- Measures for the control of site lighting (required for safe working or for security purposes);
- Arrangements to receive abnormal loads or unusually large vehicles; and
- Methods of communicating the CTEMP to staff, visitors and neighbouring residents and businesses.

No construction works and/or ancillary operations which are audible at the site boundary shall be carried out on site outside the following hours:

Monday to Friday - 8am to 6pm

Saturday - 8am to 1pm

There shall be no working on Sundays or Public or Bank Holidays. Deliveries to, and removal of plant, equipment, machinery and waste from the site shall only take place within the permitted hours detailed above.

Reason: In the interests of highway safety and to safeguard the amenity of occupiers of neighbouring properties, having regard to adopted policies SL1 of the Cheltenham Plan and adopted policies SD14 and INF1 of the Joint Core Strategy (2017). Approval is required upfront because without proper mitigation the works could have an unacceptable highway and amenity impact during construction.

- 12 Prior to first occupation of the development, the proposed means of vehicular access shall be constructed in accordance with the approved plans and thereafter retained as such at all times.

Reason: To ensure a safe and suitable access to the development is provided and maintained in the interests of highway safety, having regard to adopted policy INF1 of the Joint Core Strategy (2017).

- 13 Prior to first occupation of the development, parking and turning facilities shall be provided in accordance with the approved plans. Such areas shall not be used for any purpose other than the parking and turning of vehicles and shall remain free of obstruction for such use at all times.

Reason: To ensure the adequate provision of car parking within the site in the interests of highway safety, having regard to adopted policy INF1 of the Joint Core Strategy (2017).

- 14 Each dwelling hereby approved shall be provided with an electric vehicle charging point (EVCP). Prior to the commencement of any above ground development, the details of the appearance, location and type of electric vehicle charging points shall be submitted to and approved in writing by the local planning authority. No dwellings shall be first occupied unless the associated charging points have been installed in strict accordance with approved details and are operational. The electric vehicle charging points shall thereafter be retained for the lifetime of the development unless they need to be replaced in which case the replacement charging points shall be of the same specification or a higher specification in terms of charging performance.

Reason: In the interests of sustainable development and the reduction of carbon emissions, having regard to Section 9 of the NPPF and the Council's Climate Change SPD (adopted 2022).

- 15 Prior to the first occupation of any commercial building hereby permitted, an electric vehicle infrastructure strategy and implementation plan for the proposed commercial units shall be submitted to and approved in writing by the local planning authority. The strategy/plan shall contain details of the number and location of all electric vehicle charging points which shall comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851, and Manual for Gloucestershire Streets. Buildings and parking spaces that are to be provided with charging points shall not be brought into use until associated charging points are installed in strict accordance with the approved details and are operational. The charging points installed shall be retained for the lifetime of the development unless they need to be replaced in which case the replacement charging points shall be of the same specification or a higher specification in terms of charging performance.

Reason: In the interests of sustainable development and the reduction of carbon emissions, having regard to Section 9 of the NPPF and the Council's Climate Change SPD (adopted 2022).

- 16 The details to be submitted for approval as part of the reserved matters application(s) for appearance, scale and layout pursuant to Condition 1 shall include an Energy and Sustainability Statement. The statement shall demonstrate an improvement on the energy efficiency of the scheme over and above the Building Regulations in place at the time of this decision and shall include, but not be limited to, the following information:

- a. details of the methods used to calculate predicted annual energy demand and associated carbon emissions;
- b. measures to reduce impact on climate change (including consideration of heat proofing, construction techniques, building fabric, solar gain, natural lighting, shading, orientation, water retention, flood mitigation and landscaping).

Reason: In the interests of reducing carbon emissions, having regard to adopted policies adopted policy SD3 of the Joint Core Strategy (2017) and guidance set out in Cheltenham Climate Change SPD (2022).

- 17 No building hereby permitted shall be connected to mains gas supplies for the purposes of hot water or space heating.

Reason: To ensure that the development contributes towards the mitigation of Climate Change, having regard to Strategic Objective 6, policies SD3 and INF5 of the Joint Core Strategy (2017) and the guidance set out in Cheltenham Climate SPD (adopted 2022).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

Consultations Appendix

Building Control

25th January 2022 - The application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

Contaminated Land Officer

31st January 2022 - Contaminated Land

This site includes existing commercial property that has a range of previous uses, the details of which are not fully available to this department. The site has not previously been investigated as potentially contaminated land, but includes part of an Industrial Estate. Therefore I must recommend that should a full application be made for this development the applicant is required to submit an assessment of previous uses of the site and any potential for residual effects of that use to cause harm to future users, in particular residents of the proposed domestic property.

GCC Highways Planning Liaison Officer

20th June 2022 - Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning Development Management Procedure)(England) Order, 2015 has no objection subject to conditions.

The justification for this decision is provided below.

The proposal seeks outline application for mixed use redevelopment at Units 22 and 23 Lansdown Industrial Estate (residential and commercial) with all matters reserved apart from access, following demolition of existing buildings at Unit 22 Lansdown Industrial Estate Gloucester Road Cheltenham Gloucestershire GL51 8PL.

Access In order to ascertain likely number of trips between the lawful use of the site and those proposed, the Highway Authority carried out a TRICS appraisal, an industry recognised form of assessment used to quantify average number of vehicle trips associated to different use classes. The outputs of the survey demonstrate the proposed uses (5 residential units + 290sqm of commercial space) will be likely to

generate a combined average of 3 two-way trips in the AM (0800 - 0900) and PM (1600-1700) peak times, which is perceived as a reduction when compared to the former 900sqm of commercial space likely to generate 5 and 4 two-way movements in the AM and PM peak times, respectively. The likely reduction in the number of vehicle trips between the lawful and proposed uses is perceived as an overall betterment of the site conditions, thus not perceived likely to result in any safety or capacity concerns on the highway network.

The proposed pedestrian link to Roman road is perceived as a reasonable form of mitigation to address the otherwise lack of segregated pedestrian facilities along the main site access.

Layout The internal highways and parking layouts are only suggested not confirmed. The response and recommendation can only cover those items submitted and does not include or imply no objection will come forward for items submitted at reserved matters, for example estate road layouts, parking design etc.

To confirm, consideration must be given to policy SD4 of the Joint Core Strategy, paragraph vii which states:

New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should:

o (...) Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

Parking should be provided in accordance with the guidance set in Manual for Gloucestershire Streets - Addendum October 2021. All parking should be designed to enable electric vehicle charging according with NPPF paragraph 112.

For cycle parking, a minimum of 1 space is needed per 1 bedroom units, 2 spaces there afterwards.

On this basis, the Highway Authority would not wish to object to the proposal subject to conditions for electric vehicle charging points in order to promote sustainable transport.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. There are no justifiable grounds on which an objection could be maintained.

Conditions

Electric Vehicle Charging Points (Residential)

Before first occupation, each dwelling hereby approved shall have been fitted with an Electric Vehicle Charging Point (EVCP) that complies with a technical charging performance specification, as agreed in writing by the local planning authority. Each EVCP shall be installed and available for use in accordance with the agreed specification unless replaced or upgraded to an equal or higher specification.

Reason: To promote sustainable travel and healthy communities.

Electric Vehicle Charging Points (Commercial)

An electric vehicle infrastructure strategy and implementation plan shall be submitted to and approved in writing by the Local Planning Authority prior to the first use of any building hereby permitted. The plan shall contain details of the number and location of all electric vehicle charging points shall comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851, and Manual for Gloucestershire Streets. Buildings and

parking spaces that are to be provided with charging points shall not be brought into use until associated charging points are installed in strict accordance with approved details and are operational. The charging point installed shall be retained thereafter unless replaced or upgraded to an equal or higher specification.

Reason: To promote sustainable travel and healthy communities.

Environmental Health

31st January 2022 - Noise and nuisance

As outlined above, the proposed site includes part of an existing industrial estate, and also includes development described as "commercial units", which covers a lot of scope. I would therefore request an assessment of noise levels affecting the proposed residential areas. It may also be necessary to agree some restrictions on the types of commercial operations permitted as part of this development, in order to safeguard the welfare of new and existing residents.

Severn Trent Water Ltd

2nd February 2022 - Re Application: P-220128-34844

Re Site: Unit 22 Lansdown Industrial Estate Gloucester Road

Thank you for the opportunity to comment on this planning application. Please find our response noted below:

With Reference to the above planning application the company's observations regarding sewerage are as follows.

I can confirm that we have no objections to the proposals subject to the inclusion of the following condition:

The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and

The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.

Severn Trent Water advise that there may be a public sewer located within the application site. Although our statutory sewer records do not show any public sewers within the area you have specified, there may be sewers that have been recently adopted under the Transfer Of Sewer Regulations 2011. Public sewers have statutory protection and may not be built close to, directly over or be diverted without consent and contact must be made with Severn Trent Water to discuss the proposals. Severn Trent will seek to assist in obtaining a solution which protects both the public sewer and the building.

Please note that there is no guarantee that you will be able to build over or close to any Severn Trent sewers, and where diversion is required there is no guarantee that you will be able to undertake those works on a self-lay basis. Every approach to build near to or divert our assets has to be assessed on its own merit and the decision of what is or isn't permissible is taken based on the risk to the asset and the wider catchment it serves. It is vital therefore that you contact us at the earliest opportunity to discuss the implications of our assets crossing your site. Failure to do so could significantly affect the costs and timescales of your project if it transpires diversionary works need to be carried out by Severn Trent.

Clean Water Comments

We have apparatus in the area of the planned development, the developer will need to contact Severn Trent Water, New Connections team as detailed below to assess their proposed plans for diversion requirements.

To request a water map please follow the link, <https://www.stwater.co.uk/building-and-developing/estimators-and-maps/request-a-water-sewer-map/> scroll down the page to view the link:

Please visit www.digdat.co.uk

You will need to register on the website and then you will be able to search for your chosen location and get an instant quote online. For more information you can view Digdat's user guide(opens in a new window).

Please look at the district area supply plan (PDF)(opens in a new window) to check that your site is within the Severn Trent boundary before requesting an underground asset map.

Any correspondence and diversion applications are to be submitted through New Connections the relevant form can be found on the Severn Trent website, please complete the form as fully as possible.

https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/Diversion-of-a-Severn-Trent-Water-main.pdf

Information on diversion application charges can be found at https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/new-connections/2020/new-connections-charging-arrangement-20-21.pdf Scroll down the "New

Connections Charging" document - 1 April 2020 to 31 March 2021 go to Page 24 Diversion of a Water Asset.

Clean Green Team

26th January 2022 - Comment available to view in documents tab.

Contaminated Land Officer

14th January 2022 - I have no objection to this application for outline permission in principal. However as the plan develops for this site, we are likely to need to see a contaminated land report for this location, and a report on noise levels affecting the residential part of the site.

GCC Highways Planning Liaison Officer

7th June 2023 - Letter available to view in documents tab.

Environmental Health

14th January 2022 - A report to the standard of BS4142:2014 will be required to ensure there is no loss of amenity caused to residents of existing nearby property, or residents of the proposed new residential units.

The site is situated on a location used for a variety of previous activities as part of an industrial estate. Therefore the applicant will be required to produce a report on conditions of the land to assess the suitability of the site for the proposed uses. Such a report is likely to include:

- i) Site characterisation
- ii) Submission of a suitable remediation scheme
- iii) Implementation of approved remediation scheme
- iv) Reporting of unexpected contamination

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Publica Drainage And Flooding

14th January 2022 - The proposal states a total area of just over 900m² which means that the LLFA would not form comments on the proposal. From the information submitted I can confirm that the site is not at risk of fluvial or surface water flooding.

The submitted information does not include any reference to the disposal of foul or surface water. I advise the applicant to consider those aspects sooner rather than later due to the amount of development proposed for the site.

CBC will expect SUDS to be used on the development. I suggest that any outline consent has a condition attached that any detailed application must be accompanied by a detailed surface water disposal design for approval by CBC, noting that soakaways must be at least 5mtrs away from structures and that CBC will not accept a connection to any existing surface water disposal network without prior attenuation being achieved.

Additionally, thought must be given to an exceedance pathway for excess storm water.

I would advise that thought should also be given to using permeable paving for walkways and car parking spaces.

Severn Trent Water Ltd

Page 38

18th January 2022 - Thank you for the opportunity to comment on this planning application. Please find our response noted below:

With Reference to the above planning application the company's observations regarding sewerage are as follows.

I can confirm that we have no objections to the proposals subject to the inclusion of the following condition:

The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and

The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.

Clean Water Comments

We have apparatus in the area of the planned development, the developer will need to contact Severn Trent Water, New Connections team as detailed below to assess their proposed plans for diversion requirements.

To request a water map please follow the link, <https://www.stwater.co.uk/building-and-developing/estimators-and-maps/request-a-water-sewer-map/> scroll down the page to view the link:

Please visit www.digdat.co.uk

You will need to register on the website and then you will be able to search for your chosen location and get an instant quote online. For more information you can view Digdat's user guide(opens in a new window).

Please look at the district area supply plan (PDF)(opens in a new window) to check that your site is within the Severn Trent boundary before requesting an underground asset map.

Any correspondence and diversion applications are to be submitted through New Connections the relevant form can be found on the Severn Trent website, please complete the form as fully as possible.

https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/Diversion-of-a-Severn-Trent-Water-main.pdf

Information on diversion application charges can be found at https://www.stwater.co.uk/content/dam/stw/stw_buildinganddeveloping/new-connections/2020/new-connections-charging-arrangement-20-21.pdf Scroll down the "New Connections Charging" document - 1 April 2020 to 31 March 2021 go to Page 24 Diversion of a Water Asset.

Contaminated Land Officer

8th September 2022 - 21/02832/OUT - Con Land comments:

I do not wish to raise any objection to this application from a contaminated land perspective although it is worth noting that there is the potential for considerable risk given the historical uses of the site. This is well documented in the desk study and numerous recommendations are made in section 10.2 of the report which I fully support. These recommendations can be picked up at a later stage in the planning process and so I can support the application with

the caveat of a further report being submitted at a later date with the findings of the proposed ground investigation.

Gloucestershire Centre For Environmental Records

24th January 2022 - Biodiversity report available to view in documents tab.

Building Control

13th January 2022 - The application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

Architects Panel

18th February 2022 - Design Concept Although only an Outline application with all matters reserved apart from

access, the submission includes initial proposals for new buildings and a site layout that the panel decided would be worth commenting on in the hope that these comments might assist the design process and result in a more appropriate design solution for this site.

The panel had no objection to the principle of demolishing the existing buildings to provide improved new residential and commercial buildings on the site. The existing buildings are an eyesore and are incongruous particularly along the Roman Road frontage. Concerns were nevertheless raised on the scale and character of the proposed buildings illustrated. The three-storey block shown is totally out of keeping with the adjacent terrace houses along Roman Road. It is too tall for its setting, several metres higher than the existing building, which is already considered too tall.

The proposed new access/cycle route link from Roman Road to the larger Lansdown Industrial Estate development is too narrow to be of any major public benefit and is likely to become an uninviting dark alleyway and an inappropriate access to the block of flats.

The site layout generally could be improved - having the residential parking separated from the apartments makes no sense. More amenity space could be provided with a better site layout, improving access to the apartments, and enhancing external spaces.

The scale of the building needs to be looked at carefully - reducing the height of the building fronting Roman Road is essential but there may be opportunities for denser development at the rear where a building of some prominence could front the main entrance leading to the estate.

Consideration needs to be given to hard and soft landscaping, public and private amenities. The narrow strip of private garden along Roman Road is not realistic or appropriate in this setting.

This page is intentionally left blank

APPLICATION NO: 21/02828/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 5th January 2022	DATE OF EXPIRY : 2nd March 2022
WARD: St Marks	PARISH:
APPLICANT:	Cheshire West And Chester Council
LOCATION:	Unit 22 Lansdown Industrial Estate Gloucester Road
PROPOSAL:	Outline application for mixed use redevelopment at Units 22 and 23 Lansdown Industrial Estate (residential and commercial) with all matters reserved apart from access, following demolition of existing buildings

REPRESENTATIONS

Number of contributors	6
Number of objections	4
Number of representations	1
Number of supporting	1

87 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AF

Comments: 16th February 2022

The existing building is an eyesore, so its replacement would be welcome, although there is a bees' nest under one of the windows, whose loss would be a pity.

I strongly support the proposed link for cyclists and pedestrians.

The details of the cycle storage must be designed into the scheme at the earliest stage; otherwise it will not be possible to make it comply with the standards stated.

In theory, the development is so well located for sustainable transport there should be little need for car parking.

The applicant seems strangely ignorant of bus services: both Routes D and E serve the railway station, and the Route N passes along Queen's Road. Route B does not seem relevant to the site, and by the time the resident has reached Route A they are almost at GCHQ. There are of course Marchant's private bus services to GCHQ. The 801 seems a strange choice for going to the hospital: Route F is much nearer, and so is Route 99, which serves GRH as well.

As far as community involvement is concerned, I was unable to download the documents, and phone calls to the published number were never answered or responded to.

7 Jacobs Close
Tetbury
GL8 8RE

Comments: 24th April 2022

The principle of the development is fine, as it sensibly has residential next to residential, then increases commercial behind.. Overall it therefore, accords with Policy for this site.

if the residential is to be permitted, at the other end of the Estate, this development here should be linked to it via S106 Agreement. As I said in the other application, if you do decide to permit the residential it should be tied by S106 Agreement for suitable commercial refurbishment/redevelopment of the other part of the site site. The current application, would be part of that.

The two applications should be considered on the same Committee, unless a S106 Agreement is framed, to require this development to be completed no later than one year, after any residential is permitted in at least outline on the any of the Estate covered in the area, included in the site area of the Estate covered under the site area, as defined in the 215 dwelling scheme on the other part of the Estate.

The only reason I have indicated neutral stance is that the development, will present a 3.5m wall at the end of the adjacent garden, This has to be compared to what would normally be at the end of a garden, namely a 2m fence, or wall.. I do not of course know how high it is there now.

Obviously, if the occupiers are fine with the 3.5m, that is fine, by me If they do object, that implies a need to alter something here. That could be via; stopping the commercial building, at the edge of the garden; having a flat roof beyond garden edge, thereby decreasing height by about 0.5m (the roof profile on the main roof could be changed to a hip at the same time; or incorporating a different roof form at the end of the garden; etc

If the occupiers do not object, i do not think this element would need altering. If they do object, then a negotiated solution should be sought, not a refusal.

The parking looks fine, and the cycle route is welcome.

7 Roman Road
Cheltenham
Gloucestershire
GL51 8AB

Comments: 30th January 2022

1. We are the home owners of 7 Roman rd which is next door to the proposed flats, and has a party wall with the commercial building that is proposed to be demolished, we would like some more information on how they are going to take down the party wall that is joined to our home and how it is going to affect our property.

2. The proposed parking for 5 flats is not going to be adequate as 3 of these flats will be 2 bedroom, 2 car spaces - 2bed = 6, and 1 car space - 1 bed = 2 total needed 8 parking spaces.

3. As for the proposed commercial building at the bottom of our garden, this is going to totally obscure the Outlook from our garden as we will almost be totally surrounded by high brick walls & blocking out light.

Also we have a tree in the bottom of our garden which could well be damaged by the foundations of this commercial building.

4. We also spoke to the developers about the constant problem we have with the seagulls nesting on the flat roof of the commercial building to be demolished. This is a ideal opportunity to address this problem by not putting a flat roof on the flats or some other measures to stop the seagulls nesting on the roof, with there constant screaming all night. This would be a big positive for all the residents in Roman road.

13 Roman Road
Cheltenham
Gloucestershire
GL51 8AB

Comments: 29th January 2022

There is does not seem to be enough parking for the size of the residences, which would lead to increase cars parking in the already busy areas.

18 Roman Road
Cheltenham
Gloucestershire
GL51 8AA

Comments: 14th February 2022

1. We are extremely concerned about the amount of parking spaces being allocated to these flats. Roman Road is already at capacity with parking and although the plans show five spaces at the rear of the properties we fear this will not be enough. The plans show an entrance to the flats from Roman Road so do the developers really think that no one will park on road? We already have a permit system (8-8 Mon-Fri) but experienced

Page 44

people parking for free for the weekend which is just simply annoying - a stricter permit system to the advantage of Roman Road residents would be far more beneficial.

2. Another contention is the proposed cycle path - the plans suggest that this will run along the houses at top of Roman Road - would this remove existing parking spaces? Although suggested that the cut through between the Midland Pub and the flats will be well lit, this could potentially encourage more anti-social behaviour. As the parents of two small children looking out to the development this is extremely concerning.

3. Should the development go ahead, can we get some assurance that workmen will not be parking on the road? When Gifford Court was developed we had a dozen contractors, sometimes more, parking on the road everyday and NO parking wardens patrolling. Why should we pay for permits when no penalties are given to those who do not?

27 Roman Road
Cheltenham
Gloucestershire
GL51 8AB

Comments: 7th February 2022

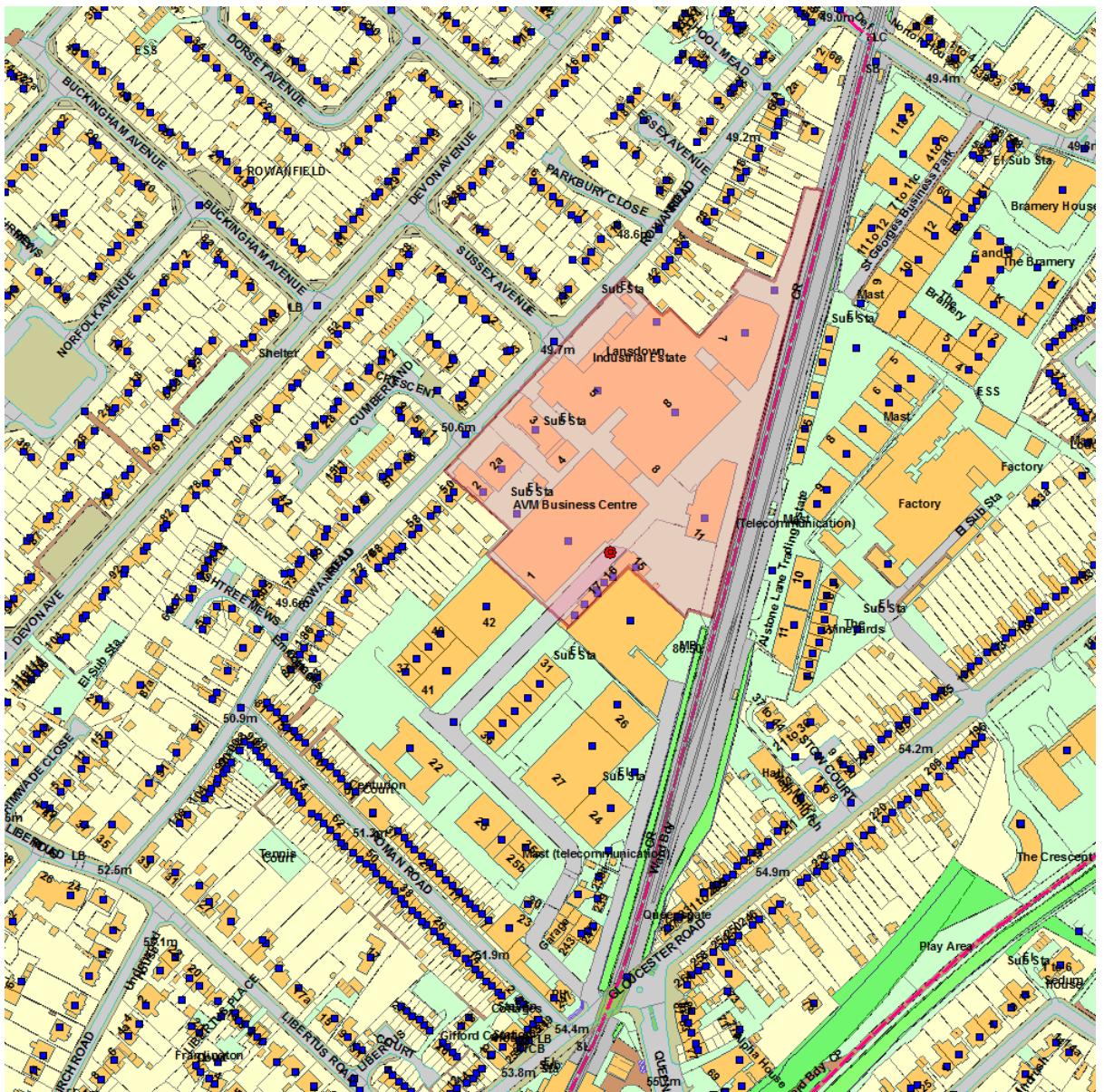
I am in objection of these plans as the developers have continually failed to address the parking situation on the street for these new homes.

The amount of spaces allocated at the back of the properties will not be enough to cater to the amount of bedrooms per flat. Ultimately I, and other residents feel and are afraid of losing more spaces on an already difficult road to find parking. What research has been done to justify minimal parking for these new flats?

If there is a guarantee no more permits will be issued for our street or for rowanfield - then I will consider changing my objection.

APPLICATION NO: 21/02832/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 15th January 2022	DATE OF EXPIRY: 16th April 2022/Agreed Ext of Time 20 th November 2023
DATE VALIDATED: 15th January 2022	DATE OF SITE VISIT:
WARD: St Marks	PARISH:
APPLICANT:	Chester West & Chester Borough Council
AGENT:	SF Planning Limited
LOCATION:	Lansdown Industrial Estate Gloucester Road Cheltenham
PROPOSAL:	Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site comprises of the (2.76 hectare) northern parcel of the Lansdown Industrial Estate (LIE). The site is located between Rowanfield Road to the north west, Gloucester Road and Cheltenham Spa train station to the south and west, the railway line to the east and the southern half of LIE and Roman Road to the west. Surrounding development is therefore a mix of commercial and residential. The main pedestrian and vehicular access to the site is via Gloucester Road with a secondary access off Rowanfield Road.
- 1.2 The northern half of LIE contains a range of industrial/commercial buildings of various sizes, architectural style and age and accommodates roughly 62% of the floor area of the entire estate. The majority of the buildings are or were last used for traditional employment purposes (Classes E (old B1), B2 and B8) but there are cafe outlets and the Cheltenham Artists' Studios has occupied one of the units for over 25 years. A number of units across the site are currently vacant and there is a higher percentage of vacant units and lower employment numbers generally within the northern half of the estate, compared to the more active employment use of the southern half.
- 1.3 The application seeks outline planning permission for development comprising of up to 215 residential dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters are reserved except for the proposed means of access to the site. Matters relating to appearance, scale, layout and landscaping are therefore reserved for future consideration.
- 1.4 Although matters relating to layout, design and appearance and landscaping are reserved, the applicant has provided an Illustrative Masterplan, including a broad landscape strategy, plus a Parameter Plan and Framework Strategy. The application otherwise includes various supporting documents including a Transport Assessment, Ecology Survey, Heritage Appraisal, Flood Risk and Drainage Strategy, Ground Investigation report, Building Condition surveys, Marketing report and various documents associated with current employment numbers and occupation of the site. A Capital Investment Strategy and Public Realm Enhancement Strategy were also provided during the latter stages of the application.
- 1.5 The application had been referred to the Planning Committee following requests from Councillors Baker and Wilkinson. The reasons for the referral are the level of public interest arising from the application, conflict with development plan policy, loss of historic industrial buildings and potential impact on heritage assets, loss/displacement of the Lansdown Artists' studios and the scale and significance of the proposals.
- 1.6 To assist Members, all consultee responses are reproduced in full at the end of the report and a summary is provided of the concerns raised by local residents. The key issues relating to this application are set out in section 6 of the report and each are discussed in broad terms, alongside the national and local planning policy context.
- 1.7 Policy MD1 of the Cheltenham Plan
- 1.8 The application site falls within the area covered by Policy MD1 of the Cheltenham Plan, which is a site specific policy relating to Lansdown Industrial Estate. The site specific requirements of this policy are an employment led regeneration of LIE which may include an element of residential development, provided that existing provision is offset by a net gain in the quality and/or number of jobs provided on the site.
- 1.9 The extent to which the proposed development conflicts with the requirements of MD1 (and adheres to other local and national planning policy and guidance) is discussed in detail at section 5 of the report.

1.10 Related Planning Applications

1.11 This application is being considered alongside planning applications 21/02828/OUT and 23/00728/FUL as they both, to varying degrees, relate directly to the larger residential scheme.

1.12 Application 21/02828/OUT proposes the mixed use (residential and commercial) redevelopment of Units 23 and 30, within the southern half of LIE. This is an outline application with all matters reserved apart from the means of access to the site. This application seeks, in part, to address the requirements of CP Policy MD1, in that it is a regeneration scheme, provides an element of residential plus the replacement of existing employment land/buildings with potentially better quality accommodation.

1.13 Application 23/00728/FUL proposes the erection of a single storey building to accommodate artists' studios. This would be a replacement building to accommodate the displaced Lansdown Artist studios at LIE, since the building they currently occupy would be demolished should planning permission be granted for the 215 residential scheme. Application 23/00728/FUL was submitted in response to officer and Member concerns over the potential permanent loss of a valuable, Borough wide cultural art facility. This matter is discussed in more detail later in the report.

1.14 Members are therefore being asked to determine all three applications separately and on their individual merits but to also consider the proposals as a whole package. For example, to adhere to the broad objectives of Policy MD1, the implementation/delivery of planning permissions 21/02828/OUT and 23/00728/FUL would need to be secured by way of s106 obligations i.e. restrictive trigger points imposed in relation to the completion and occupancy of the larger residential scheme alongside the construction of the artists' studios building and the smaller mixed use scheme in the southern half. The s106 Heads of Terms are discussed later in the report.

1.15 Environmental Impact Assessment

1.16 The proposed development constitutes Schedule 2 development under Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact assessment) Regulations 2017; exceeding the thresholds for numbers of dwellings. Upon receipt of such applications the LPA is required to produce a screening opinion as to whether an Environmental Impact Assessment (EIA) is required. Alternatively, the applicant may request a screening opinion from the Council. In this case, the applicant did not submit a written request to the Council for a screening opinion prior to submitting application 21/02832/OUT.

1.17 In accordance with the Regulations, the time period for the Council to issue a screening opinion has now passed. The applicant has therefore confirmed that they will request a screening opinion from the Secretary of State (SoS) following the Committee resolution. The LPA would not be able to issue any decision on this application prior to receipt of the SoS EIA screening opinion.

1.18 Members are therefore being asked to consider the officer recommendation with suggested conditions and resolve to either grant or refuse planning permission (subject to completion of the s106 Agreements). The decision notice for 21/02832/OUT would be issued upon conclusion of the EIA screening process.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Land Allocated for Mixed Use
Principal Urban Area

Relevant Planning History:

15/02265/PREAPP 2nd May 2017 CLO

Potential redevelopment of land

21/01218/PREAPP 27th January 2022 CLO

Redevelopment of northern parcel for residential purposes

18/00637/DEMCON 27TH April 2018 NPRIOR

Demolition of Units 11 and 12 and clearance of resultant debris.

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development

Section 4 Decision-making

Section 5 Delivering a sufficient supply of homes

Section 8 Promoting healthy and safe communities

Section 9 Promoting sustainable transport

Section 11 Making effective use of land

Section 12 Achieving well-designed places

Section 14 Meeting the challenge of climate change, flooding and coastal change

Adopted Cheltenham Plan Policies

EM2 Safeguarding Non-Designated Existing Employment Land and Buildings

D1 Design

SL1 Safe and Sustainable Living

GI2 Protection and replacement of trees

GI3 Trees and Development

CI1 Securing community infrastructure benefits

Adopted Joint Core Strategy Policies

SP1 The Need for New Development

SP2 Distribution of New Development

SD3 Sustainable Design and Construction

SD4 Design Requirements

SD9 Biodiversity and Geodiversity

SD10 Residential Development

SD11 Housing Mix and Standards

SD12 Affordable Housing

SD14 Health and Environmental Quality

INF1 Transport Network

INF2 Flood Risk Management

INF3 Green Infrastructure

INF4 Social and Community Infrastructure

INF5 Renewable Energy/Low Carbon Energy Development

INF6 Infrastructure Delivery

INF7 Developer Contributions

Supplementary Planning Guidance/Documents

Development on garden land and infill sites in Cheltenham (2009)

Cheltenham Climate Change (2022)

4. CONSULTATIONS

See appendix at end of report

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	57
Total comments received	54
Number of objections	49
Number of supporting	2
General comment	3

- 5.1** The application was advertised by way of 57 letters sent to neighbouring properties and businesses, site notices displayed at accessible locations within and adjacent to the site, and an advert placed in the Gloucestershire Echo.
- 5.2** During the course of the application a total of 54 third party representations were received, the majority in objection to the proposed development.
- 5.3** All of the comments have been made available to Members separately but the main comments and concerns raised are summarised as follows:
- Loss of valuable community art space/studios and resultant harm to the community, business and the culture of Cheltenham. No alternative accommodation for artist provided in proposed scheme.
 - Increase in traffic and congestion on Manor Road and other local roads and inadequate junction arrangements. Existing road network constraints exacerbated.
 - Proposals conflict with Policies M1 and EM2 of the Cheltenham Plan in that the proposed development is not job-generating and the loss of employment will not be offset by a net gain in the quality and/or number of jobs provided on the site; will not ensure the relocation of an existing firm to a more suitable location within the Borough; and there has not been a sustained and long-term absence of economic activity on the land with no reasonable prospect of the land being used for employment.
 - Loss of diverse employment opportunities and displacement of valuable local businesses
 - Applicant/owner failed to adequately maintain buildings in the northern half of the estate
 - Existing buildings should be refurbished and converted
 - Loss of historic buildings, harm to industrial heritage and conflict with Policy HE1 of Cheltenham plan
 - Parking overspill into adjacent industrial estate
 - Adjacent warehouse access obstruction
 - Increase in flood risk
 - Height of 4/5 storey apartment blocks and loss of amenity/light/privacy to neighbouring dwellings
 - Health and safety issues caused by increase in pedestrians and cyclists
 - Noise and odour impacts from neighbouring industrial units
 - Security of adjoining industrial units
 - Impact on existing schools and doctors surgeries
- 5.4** Representations have also been received from and on behalf of the Civic Society and others from Councillor Wilkinson. Their respective comments and documents are set out in full in the Consultations section of the report.

6. OFFICER COMMENTS

6.1 Determining Issues

6.2 The scale and nature of the proposals, the tie-in with other applications and potential conflict with development plan policy has resulted in wide ranging and complex issues for consideration. As such, negotiations since with the applicant since 2022 have been protracted and this has led to a series of reviews of the application and numerous requests for additional, supporting information from the applicant in respect of industrial heritage, existing employment numbers/occupancy rates, the extent to which the existing buildings could be re-used and evidence of continuing employment investment and public realm improvements within the southern half of the estate. There has also been a lengthy period of consideration of viability matters, as this has significant implications in terms of affordable housing and education and libraries provision.

6.3 In light of the above, discussions are ongoing in respect of the s106 obligations, but all parties are in broad agreement over the s106 Heads of Terms (HoTs). HoTs for the s106 are discussed further at paragraphs 6.35-57 and 6.153-6 of the report.

6.4 During the lifecycle of this application, the Council has adopted the Climate Change SPD that resulted in further engagement with the applicant on a range of matters. Similarly, the artists' studios application (23/00728/FUL) was submitted in response to concerns over the loss/displacement of the existing studios.

6.5 The key issues (in no particular order of importance) for consideration are therefore:-

- The Policy Framework and Principle of Development/Loss of Employment Land
- Policy MD1 of the Cheltenham Plan
- Affordable Housing
- Access, Parking and Highway Safety
- Design and Layout (indicative only)
- Impact on neighbouring amenity
- Sustainability and Climate Change
- Drainage and Flood Risk
- Ecology/Biodiversity and Green Infrastructure
- Trees and Landscaping
- Industrial Heritage, Conservation and Archaeology
- Community Infrastructure Provision - Education and Libraries
- Section 106 Obligations
- Links with applications 21/02828/OUT and 23/00728/FUL
- Other considerations – Waste Minimisation, Noise Impacts

6.6 Policy Framework and Principle of Development

6.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. This is reiterated in NPPF paragraph 47.

6.8 The development plan comprises of the saved policies of the Cheltenham Borough Local Plan Second Review 2006 (CBLP), adopted polices of the Cheltenham Plan 2020 (CP) and the Tewkesbury, Gloucester and Cheltenham Joint Core Strategy 2017 (JCS). Other

material considerations include the National Planning Policy Framework 2023 (NPPF), and Planning Practice Guidance (nPPG).

- 6.9** Policies MD1, EM1, EM2, H2, D1, SL1, CI1 and CI2 of the Cheltenham Plan and policies SP1, SP2, INF1, INF2, INF6, INF7, SD3, SD4, SD8, SD10, SD11, SD12 and SD14 of the JCS are most relevant.
- 6.10** JCS policy SD10 advises that housing development will be permitted at sites allocated for housing through the development plan, including Strategic Allocations and allocations in district and neighbourhood plans. On sites that are not allocated, *housing development will be permitted on previously developed land within the Principal Urban Area of Cheltenham except where otherwise restricted by policies within the District Plans*. The application site constitutes previously-developed land and is located within the PUA. Therefore, the general principle of residential development on this site must be acceptable. However, the extent of residential development on the application site is restricted by CP Policy MD1, discussed below.
- 6.11** Paragraph 11 of the NPPF states '*Plans and decisions should apply a presumption in favour of sustainable development....and for decision making this means approving development proposals that accord with an up-to-date development plan*'. Where policies which are most important for determining the application are out-of-date, the NPPF at paragraph 11(d) advises that planning permission should be granted '*(i) unless the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*'. This is referred to as the 'tilted balance' and the government's approach to ensuring delivery of housing nationally.
- 6.12** Footnote 7 of paragraph 11 of the NPPF explains further that for applications involving the provision of housing, relevant policies must be considered out of date in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing.
- 6.13** Cheltenham Borough Council is currently unable to demonstrate a five-year supply of housing land. As such, the contribution of up to 215 dwellings towards alleviating the housing land supply shortfall carries significant weight and is a material consideration in the determination of this planning application.
- 6.14** Notwithstanding the above, the objectives of CP Policy MD1, the site specific issues and merits of the proposed development all require careful consideration in order to determine whether the proposals are acceptable overall. This will include consideration of the wider implications for the retained employment use at the industrial estate, industrial heritage, the proposed (indicative) tenure mix, design, layout and scale of the proposed development and their impacts upon the character and appearance of the wider locality, highway safety and any potential impact upon the amenities of neighbouring land users.
- 6.15 Loss of Employment Land/Policy MD1**
- 6.16** Lansdown Industrial Estate is not identified as key employment site within the Borough, therefore Policy EM1 of the Cheltenham Plan (CP) is not relevant.
- 6.17** Policy H2 of the Cheltenham Plan allocates a number of sites for mixed-use development, including LIE. Each allocation is supported by a site-specific policy which provides further guidance and in this case CP Policy MD1 is relevant.
- 6.18** in addition to MD1, Policy EM2 of the Cheltenham Plan could also be considered relevant in that it seeks to safeguard non-designated existing employment land and buildings within the Borough. It states that development proposals for a change of use of land and

buildings currently or last in employment use will only be permitted where certain criteria are met. Proposal's for the re-development of non-designated employment sites will need to consider matters of viability when following a sequential approach to preferred alternative uses; traditional B (and new E) Class through to non-employment redevelopment, including residential uses.

- 6.19** In seeking justification for the loss of employment land, the application details appear to be relying on Criteria (b)(iii) of EM2. Given the age and condition of the majority of the existing industrial buildings, there has been a sustained and long term absence of beneficial economic activity within some of the buildings with little reasonable prospect of the buildings being used for employment use over the long term. Matters relating to marketing and the condition of the buildings are discussed later in the report.

6.20 Policy MD1

- 6.21** As set out in the introduction, the application site falls within the area covered by CP Policy MD1. The site specific requirements of the policy are an employment led regeneration of LIE which may include an element of residential development, provided that existing provision is offset by a net gain in the quality and/or number of jobs provided on the site. The policy reads as follows:

POLICY MD1: LANSDOWN INDUSTRIAL ESTATE

Site description

The site is capable of redevelopment for mixed-use, including a continued element of employment in better-quality units together with some new residential development. There would be a net loss of employment land but this should be offset by an upgrade in the quality and density of premises.

Site area 5.5ha

Constraints • Contaminated land

- Highways access*

Site specific requirements

- Employment led regeneration which may include an element of residential development provided that existing provision is offset by a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site*
- Measures to mitigate the impact of noise and vibration caused by railway line*
- Safe, easy and convenient pedestrian and cycle links within the site and to key centres*
- A layout and form that respects the existing urban characteristics of the vicinity*

- 6.22** Clearly, the application proposes a 100% residential scheme covering half of LIE and would result in the loss of all existing buildings in that northern half. It is reasonable to conclude therefore, that the proposals are in conflict with Policy MD1. Whilst the policy does not preclude residential use and purposely, does not prescribe a quantum or percentage for the residential element, the clear objective of the policy is to retain substantive employment use at LIE.

- 6.23** In seeking to address the policy requirements of MD1, officers had various discussions with the applicant, which included suggestions of including some commercial units within the proposed development (e.g. adjacent to the railway line and existing units within the

southern half). Unfortunately, the applicant was unwilling to amend the proposals and has sought to address MD1 in two ways. Firstly, the applicant has put forward two separate planning applications relating to land in the southern half of the estate; a mixed use (residential and commercial) redevelopment scheme for units 23 and 30 (21/02828/OUT) and a replacement building for the Lansdown Artists' Studios who currently occupy Unit 1A and therefore would be displaced upon implementation of the residential scheme (23/00728/FUL). The detail of these two applications and the overall merits of the proposals are discussed within their separate officer reports.

- 6.24** In brief, application 21/02828/OUT is an outline planning application and indicatively, comprises of a three storey apartment building fronting Roman Road with 2no. commercial units to the rear (potentially up to 3.100sqft), following demolition of all existing (900 sqm.) industrial buildings on the site. An Illustrative Masterplan within the Design and Access Statement (DAS) shows 5 apartments in a single building fronting Roman Road and 2no. new commercial units to the rear, accessed via LIE/Gloucester Road, plus a new pedestrian and cycle route to the side of the proposed buildings connecting Roman Road with the industrial estate.
- 6.25** The artists' studios application (23/00728/FUL) proposes a bespoke designed unit that would provide approximately 3,390sq ft. of commercial floor space. The submitted 'Investment Strategy' points out the physical enhancements that this new unit would bring to the estate but clarifies that the costs of delivering this unit would not come out of the capital expenditure and enhancement funds already identified within this document and made available by the landowner. The applicant has therefore confirmed that they would fund the delivery of the artists' studios separately but the artists would need to fund their future occupancy of the new building.
- 6.26** Should planning permission be granted for the smaller mixed use scheme at Units 23 and 30, officers consider it would go some way to address the requirements of MD1, in that the quality of the two purpose built commercial units proposed would offset the loss of the existing poorer quality and vacant industrial units 23 and 30. Similarly, the replacement artists' studios building would offer enhancement to the estate and better quality accommodation for the displaced studios. However, these proposed developments are located outside of the application site area for the larger residential scheme. The implementation and delivery of the smaller mixed use scheme (21/02828/OUT) alongside the delivery of larger residential scheme (21/02832/OUT) would need to be secured by s106 obligations. Various dwelling occupation trigger points would be imposed to prevent the completion of the 215 dwellings ahead of the mixed use scheme. Similarly, the timely delivery of the new artists' studios building would need to be agreed and secured by s106 obligations.
- 6.27** Secondly, the applicant has provided details of a 'Medium/Long Term Investment Strategy for Employment Space' at LIE. This document sets out the applicant's capital expenditure on enhancing the building stock across the estate (albeit the majority of the works are to the southern half) since their acquisition of the site in 2017. This has undoubtedly led to new lettings and the growth and expansion of some existing tenants, notably D'Arcy Wines, Deya Brewing, Ritual Coffee and Cleevly Motors, with estimated employment figures of 123. There have also been other improvements to signage, car parking areas and pavements.
- 6.28** The above 'Investment Strategy' also sets out future longer term investment plans, although points out that investment opportunities will depend on existing tenants vacating premises at the end of leases and whether the works are economically viable at that time. Nonetheless, short term investment projects include works to Sunningend/Maxet House and Units 25a and 25b. The long leases (ending 2029-31) of three major tenants units offers further evidence of continuing employment activity at LIE. An indicative timetable for works and capital expenditure (extending to 2031) is set out in the Strategy document.

- 6.29** In addition to the above capital expenditure, the applicant also puts forward a number of public realm enhancements in a separate document titled 'Lansdown Public Realm and Heritage Vision'. The document sets out public realm enhancements and heritage interpretation schemes within both the northern and southern halves of the estate. These would be undertaken on a rolling programme over the next 3-5 years, with a cost estimate of £250,000. In summary, the proposed enhancements include pavement improvements, formation of a dedicated cycle way through the estate, additional external seating and SuDS planting areas, sculpture, public art murals, temporary 'pop-up' events and heritage interpretation boards. At this stage, the proposals are largely visionary and subject to detailed design and the involvement of tenants/stakeholders. However, precedent images and potential areas within the estate for these heritage and public realm interventions are included with the document. Industrial heritage references could also be incorporated into the design of the proposed dwellings/apartment buildings.
- 6.30** As a package, the above proposed development within the retained southern half of the estate and the applicant's long term strategies towards capital investment and public realm/heritage enhancements, are considered to address some of the objectives of MD1. However, in order to satisfy these policy objectives, the implementation and timely delivery of the above proposed development (21/02828/OUT & 23/00728/FUL) and the public realm and heritage interventions would need to be secured appropriately by way of s106 obligations.
- 6.31** Marketing/Employment Numbers/Building Condition Surveys
- 6.32** Notwithstanding the above considerations and matters relating to conformity with Policy MD1, officers have also sought to better understand the feasibility and extent to which the existing buildings on site could be retained and adapted for either employment use or residential purposes. The applicant was therefore asked to provide a condition survey of the buildings and information on rental levels and occupancy rates within the northern half of the estate. This information was also considered alongside the heritage appraisal of the existing buildings, which is discussed from paragraph 6.97.
- 6.33** Various documents were subsequently provided by the applicant. The information submitted in July 2022 focussed on the refurbishment of Unit 1 for employment purposes; a building with some architectural historic interest and in 2020 (when the building was inspected) was being considered for part retention and refurbishment. The report concludes that both refurbishment and replacement would be feasible, the latter requiring a higher initial expenditure but achieving better rental levels.
- 6.34** A second survey report relates to a 2020/21 high-level feasibility study of the northern part of the estate which considered again the ability to refurbish and re-use the existing commercial buildings, together with areas of in-fill residential development. This study includes reference to a 2020 detailed building surveying study of Unit 1A. The refurbishment and redevelopment of sections of the (northern) estate generated marginal or negative land values and generally was not found to be economically viable. In May 2022 an updated assessment of the refurbishment costs for Unit 1A was also undertaken. The significant build cost inflation since 2020 is highlighted which would impact even the basic refurbishment costs of this unit, reducing rents capital values further.
- 6.35** The applicant has also submitted various supporting information setting out employment numbers and occupancy rates in the northern half of the estate and drawing comparisons with the southern half. This information was updated and consolidated on one document received in May 2023. In summary, as at May 2021 total employment numbers in the northern half amounted to approximately 57, which equates to 20% of the total employment numbers for the entire estate. These 57 employees occupied 62% of the floor area of the estate, albeit it is acknowledged that the existing buildings vary in age, form and floor space which reduces the capacity for employment in some buildings.

- 6.36** Some of the businesses present in 2021 have since vacated their premises. An updated survey of existing business was undertaken for June 2022. This amounted to an additional 25 full and part time employees. By April 2023, the situation had remained largely unchanged with the exception of one business relocating.
- 6.37** The application submission also includes a Marketing report dated October 2021. This refers to a sustained and comprehensive marketing campaign to relet empty units since 2018. Despite this there has been limited interest in vacant units due to their age, condition, obsolescence, poor access and the general appearance of the estate. The result of this has been the offer of flexible and cheap lease terms to existing and prospective tenants, but again with limited success.
- 6.38** Conclusion
- 6.39** The submitted information on refurbishment/re-use potential and employment numbers is, in officer opinion, limited in some areas and somewhat sketchy and disjointed. It is also evident that there has been little to no recent capital investment in the northern half of the estate with some units (notably units 1-17) falling into disrepair and now functionally obsolete. That said, what is clear is that the buildings within the northern half of the estate are generally older, harder to re-let, demand significantly lower rental levels and are in poorer condition with associated higher costs for repair and refurbishment. Occupancy rates and activity are also noticeably lower than in the southern half of the estate.
- 6.40** Whilst the retention/refurbishment of the existing buildings for employment purposes would be desirable, the long term feasibility of doing so (as demonstrated above) is highly doubtful, based on the evidence provided. These matters weigh in the planning balance and must therefore be considered in the context of the lack of a 5 year housing land supply.
- 6.41** Clearly, the objectives of Policy MD1 are not met in full, in that this policy seeks an employment led regeneration scheme with an 'element' of residential. However, officers consider that, on balance and given the characteristics of the northern half of the estate, the policy objectives have been addressed to a sufficient extent.
- 6.42** In reaching the above conclusions, officers have also taken into account the Council's housing land supply shortfall position, the contribution of 215 market and affordable dwellings in alleviating that shortfall and the 'tilted balance' in favour of permitting sustainable development.
- 6.43** **Design and layout**
- 6.44** Section 12 of the NPPF sets out that good design is a key aspect to achieving sustainable development and creating better places to in which to live. Similarly, Policy SD4 of the JCS require development to respond positively to and respect the character of the site and its surroundings. These objectives are reiterated in Policy D1 of the Cheltenham Plan which requires development to achieve a high standard of architectural design that complements neighbouring development.
- 6.45** The application site, although previously developed, could be considered, in parts of the site, an infill redevelopment plot and as such the guidance within Cheltenham's Supplementary Planning Document, 'Development on Garden Land and Infill Sites', may also be relevant. This document sets out various elements that are considered to create the character of an area and includes grain, type of building, location of buildings, plot widths and building lines.
- 6.46** An Illustrative Masterplan has been provided to demonstrate that the site could accommodate up to 215 dwellings with associated road infrastructure and suitable open space and landscaping. The dwellings are shown distributed across the site in the form of

3no. 5 storey apartment buildings and a linear layout of streets, fronted predominantly by rows of terraced houses, the majority with back-to-back gardens. The dwellings fronting Rowanfield Road are shown with direct vehicular access from Rowanfield Road. The main estate road is tree lined with several cul-de-sac spur roads leading off. Street planting is shown in other areas, with the exception of the areas to the front of the apartment buildings. The access road to the apartments runs alongside the railway line and some communal garden space is shown to the rear of the apartment block. In addition, an area of public open space sits in a roughly central position within the site, with various footpath linkages to other parts of the site and into the adjacent industrial estate.

- 6.47** There would be no vehicular access from within the site into the neighbouring southern half of the industrial estate. However, a cycle and pedestrian link into the industrial estate is shown on the Parameter Plan which provides a new route from neighbouring residential areas to the station and the town centre beyond. Although pedestrian access into the estate is not currently prohibited from Rowanfield Road, the environment and layout of the northern part of the estate renders this route an undesirable option.
- 6.48** The Parameter Plan corresponds with the illustrative layout and marks out indicative building frontages, street highway zones, single dwelling vehicular access points onto Rowanfield Road, building height zones, public open space, green buffer areas and cycle/pedestrian and vehicular access points. In terms of building heights across the site, two storey dwellings would front Rowanfield Road, with storey heights (up to 5 storeys) increasing southwards towards the railway line. The two green buffer areas would offer suitable separation distance and soft landscaping between the proposed development and neighbouring dwellings and the rear elevations of adjoining industrial buildings. An 8 metre wide railway line buffer is also proposed along the southern site boundary, extending into a narrowing strip of land at the rear of properties fronting Rowanfield Road.
- 6.49** Other than concerns raised over the potential proximity of some proposed dwellings to neighbouring industrial units and the proximity of the 4/5 storey apartment buildings to properties in Rowanfield Road, officers have no overriding concerns with the Parameter Plan details which broadly, offer a sensible indicative design and layout approach to the redevelopment of the site.
- 6.50** Any noise and amenity impacts affecting future occupiers of the proposed dwellings could be dealt with at REM stage. A condition is suggested requiring the submission and approval of a noise impact assessment and implementation of any resultant noise mitigation recommendations. Similarly, building heights in proximity to the rear gardens of properties in Rowanfield Road would be considered further at REM stage, alongside a shading analysis that would need to accompany reserved matters application(s). Building heights in the area adjacent to the railway line are currently shown as being up to 5 and 4 storeys. However, given the concerns over the height of some of the buildings in this location, the Parameter Plan related condition requires these building heights to be a minimum of 2.5 storeys and 8m in ridge height. Any proposed building height above this minimum could then be considered more carefully at REM stage. This does not mean that a 4 or 5 storey building would not be deemed acceptable in some locations adjacent to the railway, but it would allow the Council better control over the design and scale of buildings in close proximity to neighbouring residential properties.
- 6.51** The Framework Strategy Plan is similar to the Parameter Plan but includes pedestrian and cycle routes within the site and improvements to cycle and pedestrian paths within the adjacent southern half of the estate and beyond to Cheltenham Spa station and the Honeybourne Line. It also indicates the application site boundary for the smaller mixed use scheme (21/02828/OUT) and the applicant's ownership of adjoining land. The details and implementation of proposed off-site pedestrian and cycle paths could be adequately secured by a suitable worded condition, as suggested in the conditions list.

6.52 In light of the above, the proposed development adheres broadly to the objectives of Policy D1 of the Cheltenham Plan, Policy SD4 of the JCS, Section 12 of the NPPF and guidance set out in the relevant SPD.

6.53 Impact on neighbouring property

6.54 Section 12 of the NPPF requires development to create places with a high standard of amenity for existing and future users. Policy SL1 of the Cheltenham Plan advises that development will only be permitted where it will not cause unacceptable harm to the amenity of adjoining land users or the locality. In assessing impact on amenity, the Council will take account of matters including, but not limited to, loss of privacy, light and outlook. The policy is consistent with adopted JCS policy SD14.

6.55 The nearest residential properties are located to the north east of the site in Rowanfield Road. The majority of other surrounding development is in commercial use. All the concerns raised by local residents are duly noted. These concerns include the traffic and amenity impacts associated with the proposed development.

6.56 Matters relating to the proximity of 4/5 storey buildings to the rear of properties in Rowanfield Road are discussed in the preceding section of the report.

6.57 Properties located on the north side of Rowanfield Road would face new two storey dwellings. This would arguably offer a better visual outlook and compatible neighbour to existing dwellings and would remove any noise, disturbance and odour pollution impacts arising from the existing industrial use of the site.

6.58 At this stage, there are no other amenity concerns raised. Any adverse impacts on neighbouring land users in terms of noise and disturbance, overlooking, loss of privacy, light or outlook, shading or overbearing appearance, would be considered further at REM stage when the details of the design and layout of the scheme are known.

6.59 The living conditions of future occupiers of the proposed dwellings would also be considered at REM stage. The layout of the proposed development, plot and garden sizes, distances between property boundaries and facing windows and potential noise impact from adjacent industrial units would all be considered at a later stage.

6.60 For the above reasons, the proposals are considered to be in broad accordance with the objectives and policy guidance of section 8 of the NPPF (2023), Policy SL1 of the Cheltenham plan and Policy SD14 of the JCS.

6.61 Access and highway issues

6.62 Paragraph 11 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

6.63 Policy INF1 of the JCS reiterates the stance of the NPPF and states that proposals should ensure that safe and efficient access to the highway network is provided for all transport modes.

6.64 The application is accompanied by a comprehensive Transport Assessment. Gloucestershire County Council, acting as Local Highway Authority (HA), has reviewed the proposals alongside the submitted transport related documents. HA's (updated) comments are set out in full in the Consultations section of the report.

6.65 In terms of the potential highway impacts of the proposed development, the HA has carried out a TRICS assessment which estimates that the proposals would generate approximately 14 additional trips in the AM peak and 8 additional trips in the PM peak

when compared to the existing, applicant surveyed peak period traffic flows. The HA has taken into account that the lower than expected applicant surveyed traffic flows are a result of the under occupation of the northern part of the industrial estate and as such has also considered the considerably higher TRICS based trip rates for the existing commercial uses had the northern part of the estate been fully occupied.

6.66 In light of the above, the HA concludes that there would be no unacceptable impact on highway safety or severe impact on congestion. Furthermore, no concerns are raised in respect of the proposed vehicular access via Rowanfield Road, and the new pedestrian/cycle link to Gloucester Road through the southern part of the industrial estate.

6.67 The HA therefore has no objection to the proposals given that there are no justifiable grounds on which an objection could be maintained. A number of conditions are suggested relating to the proposed and existing access points, highways construction management plan, cycle storage, EV charging points and off-site works. These conditions will be added and re-worded where necessary.

6.68 Sustainability

6.69 NPPF paragraph 152 states that:

'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'

6.70 NPPF paragraph 154 b) goes on to state that new development should be planned for in ways that *'can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards'*.

6.71 Policy SD3 of the JCS requires all new development to be designed to contribute to the aims of sustainability by increasing energy efficiency and minimising waste and air pollution. Development proposals are also required to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings. Similarly, Policy INF5 of the JCS sets out that proposals for the generation of energy from renewable resources or low carbon energy development will be supported.

6.72 The Cheltenham Climate Change SPD (adopted June 2022), sets out a strategy for decarbonising buildings over the next decade. For residential development there is an opportunity to improve the environmental performance of buildings through the inclusion of technologies and features such as photovoltaics, heat recovery, permeable (or minimal) hard surfaces, fabric first design approach, insulation renewable and appropriately sourced materials, alternative heating systems (heat pump) and thoughtful kitchen design.

6.73 This application was submitted prior to the adoption of the SPD and therefore did not include a Sustainability Statement. The Design and access Statement included a short section on energy and sustainability matters but this was considered by officers an insufficient response to climate change and the SPD. At the request of officers the applicant has provided a separate Sustainability and Energy Statement/Strategy which sets out the applicant's proposed approach to sustainable design and measures to reduce carbon emissions, as follows:-

- Passive design principles will be utilized to maximise solar gain, natural daylighting and ventilation and shading. Building orientation and footprint will be optimised accordingly.

- Use of renewable energy (likely ASHPs throughout), high levels of insulation and thermal bridge minimization
- Fossil fuel free development i.e. non-gas heating strategy with likely low carbon air source heat pumps (ASHPs) installed throughout
- Roof mounted solar PV panels
- Priority for water efficiency measures to be incorporated into building fixtures and fittings
- Interim Travel Plan submitted – encourages shared mobility and home office provision plus new cycle and pedestrian routes
- EV charging points provided for all new dwellings
- Potential significant biodiversity net gains (BNG) for hedgerow and biodiversity
- Space allocated for waste, recycling and composting in accordance with the Gloucestershire Waste Core Strategy (GWCS) and SPD. The submitted Waste Minimisation Statement identifies specific measures to minimise consumption and waste generation during the construction and operational stages
- SAP calculations will be undertaken to establish energy demand of proposed dwellings

6.74 Note that, this is an outline planning application and as such, the applicant comments that as the design progresses, further energy (SAP) modelling/calculations will help scale renewable systems to get as close to net zero as is feasible, taking into account the site location and planning considerations. For example, detailed roof designs, embodied carbon minimisation and renewables feasibility assessments have not yet been completed. Exact specifications on renewables, generation capacity and percentage of offsets of predicted total energy consumption have also not been finalised.

6.75 The proposed strategy is welcomed and overall, should reduce energy demand and CO2 emissions beyond Building Regulations Part L. In this respect, officers have utilised the SPD effectively at this early stage to seek enhancements to the sustainability and low carbon approach to this development.

6.76 In light of the above and given that this is an outline planning application, officers consider it reasonable to add a condition to ensure that the development is carried out in accordance with measures set out in an updated Sustainability and Energy Statement which shall be submitted to and agreed in writing by the local planning authority as part of the first reserved matters application. A condition requiring that there shall be no gas supply connection to any part of the proposed development is also included.

6.77 Heritage and Conservation

6.78 The application site is not located within a Conservation Area and none of the existing buildings are statutorily listed or included in the Council's Index of Buildings of Local Interest. As such, it is important for Members to note that none of the existing buildings are afforded any protection when considering the proposed demolition works. With this in mind, in April 2018 the Council confirmed that prior approval for the demolition of units 11 and 12, which are the two oldest buildings on site, was not required (18/00637/DEMCON). Unit 12 has already been demolished.

- 6.79** Nonetheless, it is recognised that historically, the wider Lansdown Industrial Estate site has been in industrial use since the late 19th century. It began as an iron works in 1864 and later was known as Sunningend, which was the home of the Gloucester Aircraft Company owned by H H Martyn & Co who carried out engineering and craft trades, including aircraft manufacture.
- 6.80** Lansdown Industrial Estate is located strategically along the railway-line which allowed the site to trade outside of Cheltenham via the rail network. The form, architectural design and features of some of the older buildings on site, are evidence of the site's industrial past. Indeed, there are reported remains of historic steel beams in Unit 11 in addition to some surviving original, metal framed windows. Representations from third parties suggest that an existing building also shows evidence of an early example of block and beam and a pot concrete floor. That said, it is equally recognised that the majority of the older buildings within the northern half of the state have undergone significant alteration over the decades and the extent to which their internal and external architectural industrial references survive has been significantly affected by time and the evolution of the site as it has adapted to modern industrial uses.
- 6.81** In this regard, NPPF paragraph 203 states that in determining planning applications, local planning authorities should take account of:-
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness
- 6.82** Similarly, Policy SD8 of the JCS requires development to make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment.
- 6.83** Given the historic, industrial use of this site and concerns raised by the Civic Society and other third parties over demolition of potential heritage assets, the applicant was asked to carry out a Heritage Appraisal of the site; albeit it was agreed that this exercise could exclude a detailed assessment of the more modern additions to the industrial estate.
- 6.84** The submitted Heritage Appraisal provides an outline of the historical development of the whole industrial estate and considers the impact of the proposals on the significance of the site's industrial past. The appraisal identifies that the majority of the buildings were constructed in the early to mid 1900s (following extensive bombing of the site) and some as late as the 1990s, however the study does focus on Units 1 and 1A (originally an engine testing house) constructed c1883-1899, Unit 11 constructed c1907-21 and Units 15-17. These buildings have the most historic interest potential.
- 6.85** In summary, the appraisal concludes that, despite the early phases of the site's history being of some historic interest, there is hardly any surviving fabric to illustrate this. The only surviving element appears to be pitched roof sections of Units 15-17, which formed part of an ancillary building. However, the use of site during the H H Martyn & Co aircraft manufacturing phase is said to be of considerable historic interest. But again, the appraisal concludes that there are few surviving buildings from that period and those that remain are generic industrial structures that have since been significantly altered. Individually and collectively, the building designs do not reflect their role in the production processes that would have been undertaken at that time. Similarly, there is no surviving historic machinery. In conclusion, the appraisal author considers that the industrial works

as a whole is of some historic interest but the surviving buildings on the application site are, at best, of very limited historic or architectural interest.

- 6.86** The County Archaeologist and Council's Conservation officer (CO) have investigated the heritage significance of the site as a whole and that of individual buildings; the applicant's Heritage Appraisal and the representations made by the Civic Society and others assisting the CO's considerations. Officers have also considered the Civic Society's later, additional representations and those of other interested parties. The Civic Society's comments are set out in full at the end of the report.
- 6.87** The Civic Society and their appointed historian provide a critique of the Heritage Appraisal and offer their own assessment of the historical significance of the site, with alternative proposals for the site's redevelopment, including finding alternative, sustainable uses for some of the buildings. They conclude that the estate should be formally protected for its historical, evidential and architectural value and its specific contribution to Cheltenham's industrial heritage.
- 6.88** In reviewing the applicant's Heritage Appraisal the CO comments that although it provides some clarity to the previous concern over the weak understanding of the history of the site and the surviving historic industrial buildings and structures, the appraisal fails to provide a sufficiently thorough understanding of the historic significance of the buildings. It finds little to no value in the surviving buildings, appearing to primarily base this on their aesthetic appearance or value. The CO points out that industrial buildings by their nature do not necessarily have an aesthetic value. Industrial buildings can hold evidential, historical and communal value. In conclusion, the CO considers the development proposal, as submitted, a lost opportunity to acknowledge and celebrate an important period of Cheltenham's industrial and artistic heritage. The CO's comments are set out in full at the end of the report.
- 6.89** Subsequent to the above CO comments, further discussions took place regarding the potential for 'local listing' some of the existing buildings (i.e. including the buildings within the Council's Index of Buildings of Local importance). However, this process is no longer active and in any event, would offer limited protection against substantial demolition because the site is outside of a conservation area. Similarly, the CO has also considered requests for the 'spot listing' of some or all of the buildings (by way of a Building Preservation Notice (BPN) in liaison with Historic England). The CO considers that whilst the historic significance of the site is recognised, it would be difficult to identify individual buildings of significance because they have been heavily altered over time. As such, their eligibility for statutory listing is much in doubt and the strong advice of the CO is that a BPN is not pursued.
- 6.90** Furthermore, it is not apparent that the heritage significance of the site was raised as a concern following the various public consultation exercises associated with Policy MD1 and the Cheltenham Plan adoption. Equally, there is no reference to heritage matters/requirements within Policy MD1.
- 6.91** Notwithstanding the above, the application site and the wider Lansdown Industrial Estate MD1 allocation will be reviewed as part of the on-going Strategic Local Plan work.
- 6.92** Archaeology
- 6.93** The County Archaeologist (CA) has reviewed the proposed development and (applicant) submitted Heritage Appraisal (as the CA requested desk based environment assessment).
- 6.94** The CA considers that the Heritage Appraisal has addressed the previous request for an assessment of the heritage interest of the site, in particular any upstanding elements

which still hold industrial heritage value. The CA concludes that despite the heritage interest in the historical development of the site it is clear that due to much alteration during the post-war period very little of architectural or heritage interest is left in the upstanding fabric of the site and there is little surviving machinery left to document any important technological developments.

6.95 The CA does not consider therefore that building surveys are necessary and due to the extent of alteration and subsequent development within the site it is unlikely that any belowground archaeological remains of interest will be impacted by the proposals. The CA makes no recommendations for further investigation in relation to this application.

6.96 Conclusion

6.97 Officers have considered and taken into account all of the above concerns, including the robustness and highlighted inadequacies of the applicant's Heritage Appraisal. Firstly, the importance of the site's industrial past, the potential significance of the evidential historic value of surviving buildings and its overall contribution to Cheltenham's industrial heritage are not in dispute. However, these matters need to be weighed against other competing considerations; in particular, there are no designated heritage assets within or adjacent to the site (other than a nearby listed lamp post), CP Policy MD1, the Council's housing land supply position, the nature and condition of the buildings and their suitability for conversion to alternative uses and the other economic, environmental and social benefits associated with the proposals.

6.98 The heritage significance of the application site is therefore considered to carry limited weight in the overall planning balance.

6.99 **S106 Obligations/Heads of Terms**

6.100 Affordable Housing/Viability

6.101 Policy SD12 of the JCS seeks a minimum provision of 40% affordable housing for all non-strategic allocation sites. In addition, Policy SD11 requires housing development to provide an appropriate mix of dwelling sizes, types and tenures in order to contribute to mixed and balanced communities and a balanced market, having regard to local housing needs, as evidenced by the latest evidence bases on housing need.

6.102 The application as submitted, included no affordable housing provision (AH). The applicant was therefore asked to carry out a viability assessment to justify the lack of AH. The applicant's subsequent viability appraisal has been reviewed by the District Valuer Service (DVS), and their final report is available to view online.

6.103 In summary, a SD12 policy complaint scheme for the proposed 215 dwellings would deliver 50no. on-site affordable units, an off-site affordable housing commuted sum of £3,706,529.17, plus identified s106 contributions totalling £692,862, and a CIL charge of £1,140,205.50. The Council's Housing Enabling officer would expect the tenure mix of the 50 affordable dwellings to be 52% social rent and 48% First Homes. A further 36 affordable units would be secured by way of the off-site commuted sum of £3,706,529.17 and the tenure mix for these dwellings would be social rent.

6.104 However, the DVS conclude that the proposed development is unviable in terms of delivering the above policy complaint scheme (i.e. 40% AH provision), but through the gradual reduction of the above policy contributions, 40no. on-site affordable units (19%) could be delivered plus all s106 financial contributions (education and libraries provision totalling £692,862). There would be a zero off-site AH commuted sum. These conclusions are reached on the basis of Community Infrastructure Levy (CIL) relief (for existing/recent occupancy of buildings for a continuous period of 6 months within the past

3 years) not being applied at this outline planning stage and therefore the full CIL charge of £1,140,205.50 being utilised.

- 6.105** Dependent on the number of vacant units on site at the time of determining the reserved matters application(s), Vacant Building Credit (VBC) may also need to be taken into account as this may also affect the amount of AH that can be provided at REM stage. CIL contributions and any CIL relief would also need to be re-calculated at REM stage; based on the existing floor space at that time and any CIL relief afforded for social housing provision.
- 6.106** In light of the above possible scenarios at REM stage, and at the request of officers, the DVS carried out sensitivity testing to ascertain the possible effects on viability if the reliefs from CIL were available at REM stage. These reliefs would need to take account of the number of affordable units provided within the scheme and the existing accommodation on site, which at that time is either occupied or has been lawfully occupied for a continuous period of 6 months within the previous 3 years. This exercise confirms that with a reduced CIL charge of £201,997.20, the scheme remains unviable in terms of achieving a policy compliant scheme. However, the reduced CIL charge would enable an increased on-site AH provision of 48 units, and s106 financial contributions of £680,222. This is based on a slightly higher CIL charge of £231,759.87 which takes into account the larger number (48) of affordable units that could be delivered within this potential scheme.
- 6.107** Given that this is an outline planning application, the DVS has also advised that a viability review clause with the s106 Agreement is appropriate. The final layout, numbers of dwellings and the detailed design of those dwellings are currently unknown and reserved for future consideration. It is commonplace for the Council to secure a viability review mechanism through s106 obligations, particularly in circumstances where construction does not commence within a prescribed period of time. This would also enable any CIL relief or VBC to be applied correctly. Although Heads of Terms are generally agreed between the parties, discussions are on-going with the Council's legal team over the drafting and exact wording of the above s106 terms and obligations.
- 6.108** Regardless, the above scenarios and viability sensitivity testing provides Members with some understanding of other possible affordable housing provision outcomes at REM stage, when the full detail of the scheme is known.
- 6.109** In the light of the DVS report, the Council's Housing Enabling Officer (HEO) supports the applicant's commitment to delivering affordable housing on this site,. The proposed tenure mix, the categories, size and space standards of the dwellings are currently being discussed with the applicant and once agreed, will be set out within the s106. The distribution and clustering of affordable units across the site and the appearance, build quality and materials would be determined at REM stage and in accordance with an agreed Affordable Housing Statement.
- 6.110** The HEO's full comments are set out in full in the Consultations section of the report.
- 6.111** A draft s106 is in circulation and this will include the REM review mechanism clause and triggers for the phased delivery of affordable units; specifically requiring that the owner/developer shall not permit or cause the occupation of more than 50% of the open market homes before 50% of the affordable housing units have been made available for occupation and have been transferred to an Affordable Housing Provider (for the social rented and shared ownership homes).
- 6.112** Additionally, the s106 is likely to include a trigger which prevents the occupation of more than 90% of the open market homes until all (100%) of the affordable housing units have been completed and made available for occupation.
- 6.113** Community and Highways Infrastructure/s106 Obligations

- 6.114**JCS policy INF6 states that where site proposals generate infrastructure requirements, new development will be served and supported by adequate on and/or off-site infrastructure and services which are fairly and reasonably related to the scale and type of development proposed. Regard to the cumulative impacts on existing infrastructure and services must also be considered. Planning permission should only be granted where sufficient provision has been made to meet the needs of new development and/or which are required to mitigate the impact of the development upon existing communities.
- 6.115**JCS policy INF7 advises that financial contributions will be sought through the s106 and CIL mechanisms as appropriate; in this case, the s106 mechanism being used to secure site-specific obligations.
- 6.116**Having regard to the objectives of JCS policies INF1, INF6 and INF7 (and Cheltenham Plan policies D1 and C11), contributions towards the provision of education and library facilities are required as a consequence of the proposed development. In this case, financial contributions are sought through a s106 Agreement.
- 6.117**The County Council (GCC) has assessed the impact of the proposed development on various community infrastructure, in accordance with the Local Development Guide (LDG) and with regard to CIL regulations. GCC in its capacity as education and libraries authority, requests financial contributions towards (27.37no.) secondary school places provision at Bourneside School and/or in the Cheltenham school catchment area for pupils aged 11-16. GCC has concluded that there is sufficient capacity within the local primary schools and secondary schools (for pupils aged 16-18) to accommodate the expected increase in population arising from the proposed development.
- 6.118**The development would generate a need for additional library resources (through refurbishment of the building, stock and IT improvements) at Hesters Way Library. GCC therefore requests a libraries contribution; costed on the basis of the 215 proposed dwellings.
- 6.119**Conclusion
- 6.120**The applicant has agreed to enter into a s106 Agreement to secure the above education and libraries provision and affordable housing delivery. Additional obligations to be secured via the S106 agreement include the provision and future management/maintenance of the proposed public open space and LEAP/LAP and financial contributions towards potential off-site improvements to local recreational facilities.
- 6.121**Obligations are also included to secure the implementation and delivery of proposed development under applications 21/02828/OUT and 23/00728/FUL, alongside the construction of the subject larger residential scheme.
- 6.122****Other considerations**
- 6.123**Drainage/Flood Risk
- 6.124**The application has been assessed in accordance with JCS Policies INF2 and A4 and section 14 of the NPPF; paragraph 167 setting out that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 6.125**The application site is located in Flood Zone 1 (lowest flood risk) and is not affected by fluvial flooding from nearby watercourses. The application is accompanied by a Flood Risk Assessment and Drainage Strategy.

- 6.126** The Local Lead Flood Authority (LLFA) has reviewed the FRA and proposed drainage strategy. In summary, the LLFA considers the proposed drainage strategy lacks coherency and no discharge rates or storage calculations are provided. Therefore, a number of concerns/queries are raised, some of which should be addressed prior to the determination of the application.
- 6.127** The LLFA also identify a minor area of risk of surface water flooding but this could be dealt with by the on-site drainage methods. Infiltration testing would need to be carried out at the detailed design stage but, if infiltration is not possible, there are alternative discharge strategies proposed to the public sewer or to surface water sewers in the area. Estimates of the current and proposed discharge rates (at greenfield run-off rates) should be provided and agreed prior to determination to provide the basis for the detailed drainage strategy to follow at REM stage. Clarification was also sought on how climate change has been incorporated into the proposed drainage strategy.
- 6.128** Following further discussions with the applicant and LLFA and acknowledging that this is an outline planning application, as a minimum, the applicant was asked to confirm an appropriate discharge rate (e.g. greenfield runoff rate). This information was provided by way of an updated FRA and Drainage Strategy which the LLFA confirms is acceptable.
- 6.129** The LLFA comments are set out in full in the Consultations section below.
- 6.130** The Environment Agency were consulted and any response received will be provided by way of an update report.
- 6.131** Severn Trent (ST) were also consulted but have not commented on the application. ST would be re-consulted at REM stage.
- 6.132** In light of the above consultee responses, conditions are suggested which require the submission of a detailed drainage strategy for the disposal of foul and surface water flows and a drainage maintenance strategy.
- 6.133** Ecology/Biodiversity and Green Infrastructure
- 6.134** Policy SD9 of the JCS seeks the protection and enhancement of ecological networks and across the JCS area, improved community access and for new development to contribute positively to biodiversity and geodiversity whilst linking with wider networks of green infrastructure.
- 6.135** NPPF paragraph 180 seeks through development, the protection and enhancement of valued landscapes and sites of biodiversity value and the need to minimise and provide net gains for biodiversity and coherent and resilient ecological networks. Paragraph 181 sets out a mitigation hierarchy in terms of retained and enhanced environmental features that can be incorporated into a development proposal.
- 6.136** Landscaping would be dealt with at REM stage. However, the (revised) Illustrative Masterplan shows areas of public and semi-private open space within the scheme layout, including street trees and new hedgerow planting.
- 6.137** The site is currently almost entirely covered by buildings and hard surfacing. Therefore, the ability to improve on the biodiversity credentials of the site is not difficult. However, there is potential for protected species to be present on the land or within the buildings. The applicant was therefore asked to carry out an ecological site survey and to demonstrate that biodiversity net gain (BNG) could be achieved.
- 6.138** The subsequent submitted details included an Ecological Survey report and a shadow Habitats Regulations Assessment (sHRA). This information was reviewed by the Council's ecology advisor (EO) who requested further information including a desk study

for protected species records and sites of nature conservation, bat surveys for buildings 1 and a Biodiversity Net Gain (BNG) assessment to demonstrate a positive gain.

- 6.139** The applicant's BNG assessment was reviewed by the Council's ecology advisor who welcomed the (2000%) positive BNG for habitats but advised that the scheme would also need to demonstrate a positive BNG for hedgerows, ideally through on-site hedgerow creation. Accordingly, the revised Illustrative Site Layout plan shows an area of proposed native species-rich hedgerow planting (approximately 100 metres) to demonstrate that the scheme is capable of achieving a (100%) positive BNG for hedgerows but with an understanding that the exact location and precise positive BNG value for this element may change slightly upon submission of the detailed REM scheme.
- 6.140** The EO recommended pre-commencement bat surveys and protected species desk study can be dealt with by way of suitably worded conditions and the submission of further details at REM stage/prior to commencement of development.
- 6.141** All recommended mitigation and enhancement measures as outlined within the submitted ecology report and subsequent LPA reviewed bat reports will need to be expanded upon in the form of a Landscape Environmental Management Plan (LEMP) covering a 30 year period. The LEMP will also need to accord with the reported Biodiversity Net Gain (BNG) calculations, and include timescales for implementation, management and monitoring of the site. Implementation of the other various enhancement measures and mitigation for protected species can also be secured by way of planning conditions. Should roosting bats be present, then evidence of a Natural England bat licence should also be submitted to the local planning authority prior to commencement of development.
- 6.142** Details of the requested Home Owner Information Pack (HIP) to mitigate any adverse impacts on the Beechwoods SAC would also need to be submitted and approved prior to first occupation of any dwellings on site. Matters relating to the Beechwoods SAC are discussed further at paragraph 6.143 below.
- 6.143** The EO also recommends that conditions are attached to any planning permission, requiring approval of an external lighting design strategy for biodiversity for the boundary features and any native planting.
- 6.144** In addition, GCER records also show that important species or habitats have been sighted on or near the application site in the past. These have been considered as part of the supporting Ecological Appraisals discussed above.
- 6.145** Habitats Regulations Assessment/Cotswold Beechwoods Special Area of Conservation (SAC)
- 6.146** Policy BG1 of the Cheltenham Plan states that development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the European Site network (alone or in combination), and the effects cannot be mitigated.
- 6.147** Therefore, in order to retain the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) all development within the borough that leads to a net increase in dwellings will be required to mitigate any adverse effects.
- 6.148** Natural England were consulted on the proposals. HE advised that the application could, in combination with other new residential development in the authority area, have potential significant effects on the Cotswold Beechwoods SAC. An appropriate assessment in recognition of the application site's location relative to the SAC and the strategic status of the allocation should therefore be undertaken. The local planning authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the appropriate assessment stage where significant effects cannot be ruled out.

- 6.149** In response to NE's advice, the applicant subsequently provided a shadow Habitats Regulations Assessment of the site's location relative to the above SAC and Severn Estuary SPA/Ramsar in accordance with the Conservation of Habitats and Species Regulations 2017.
- 6.150** The sHRA concludes that, although no risk of adverse effects on the integrity of the Cotswold Beechwoods SAC is expected to arise as a result of the proposed development of the site in isolation. However, the risk of a potential cumulative effect as a result of increased recreational pressure has been identified and it is recommended that further mitigation is secured.
- 6.151** The proposed development does not include sufficient greenspace to provide opportunities for casual recreation/short walks, although could include a children's play area. Appropriate mitigation in this instance is therefore considered to be the identification of alternative greenspaces, located outside of the Cotswold Beechwoods SAC and closer to the proposed development, that would offer suitable alternative recreational opportunities for future residents.
- 6.152** The sHRA and its mitigation proposals have been reviewed by the Council's Ecology advisor who considers that suitable mitigation could be secured in the form of a homeowner pack/information leaflet issued to all first occupiers of the dwellings. This would both educate and raise awareness of the SAC and list other recreation opportunities locally and further afield; broadly as set out at paragraphs 5.4-8 of the sHRA. A condition has been attached accordingly.
- 6.153** As requested, Natural England were re-consulted upon receipt of the sHRA but did not provide any further comment.
- 6.154** The Shadow sHRA dated April 2023 is therefore considered acceptable and Cheltenham Borough Council as the Competent Authority has adopted the sHRA as the Council's Appropriate Assessment under the Habitats Regulations.
- 6.155** This planning application was validated on 15th January 2022. Natural England has stated in its letter to Councils of 9 September 2022 that the Cotswolds Beechwoods SAC Mitigation Strategy of May 2022 should apply to relevant applications (constituting habitat development) submitted on or after the 1st November 2022. Accordingly, Members should note that SAC mitigation in the form of a financial contribution is not being sought for this development at outline or REM stage.
- 6.156** Trees and Landscaping
- 6.157** The application site, including its boundaries, does not contain trees or hedgerow of any note. The Council's Trees Officer (TO) has not therefore been consulted at this outline stage.
- 6.158** Noise Impact
- 6.159** Large parts of the application site are located adjacent to or in close proximity to existing commercial and industrial units within the southern area of Lansdown Industrial Estate and/or a main railway line. As such, there is potential for noise to impact on the amenities of future occupiers of the proposed dwellings, particularly any dwellings/flats with windows facing the railway line.
- 6.160** The application does not include a noise impact assessment. The Council's Environmental Protection team raise no overall objection to the proposed development but request that a detailed noise report be submitted to understand the impact of the railway line and nearby commercial units on affected residential units. The submitted noise report and any required mitigation measures would need to include details of façade/fenestration

specifications and potentially, bespoke boundary treatment. A condition requiring the submission of a noise report is added accordingly.

6.161 Section 106 Obligations

6.162 During the course of the application and consideration in respect of the policy framework and material planning considerations, regard has been given to the consultation responses received and the likely impacts that would arise as a result of the development. The Community Infrastructure Levy Regulations (2010) came into effect in 2010 and Regulation 122 sets out limitations on the use of planning obligations. It sets out three tests that planning obligations need to meet. It states that planning obligations may only constitute a reason for granting planning permission if the obligation is:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related in scale and kind to the development.

6.163 Regard has been given to the CIL Regulations in making a recommendation and the following matters, which are considered in the above paragraphs, are considered to represent obligations that are necessary to make the development acceptable in planning terms, are directly related to the development and are fairly and reasonably related in scale and kind to the development.

1. Affordable Housing

The scheme needs to deliver Affordable Housing for Local Needs. It is therefore necessary to ensure the delivery of 40 affordable units dwellings with a tenure mix of social rented housing, First Homes and shared ownership houses. This should equate to a housing mix of 70% social rented and 30% affordable home ownership. Affordable housing will be delivered in an agreed phased programme of works. Delivery sought at various trigger points.

2. Education provision

The proposed development would generate demand for additional school places within the relevant school catchment area. Financial contributions are therefore sought towards secondary school education provisions for pupils aged 11-16. Payment sought at various trigger points.

3. Libraries provision

The proposed development would generate demand for additional library resource. Financial contributions towards improvements in library provision at Hesters Way library are therefore sought. Payment sought upon first occupation of development.

4. Public Open Space

Agreement of Green Infrastructure Management and Maintenance Plan for Public Open Space including details of BNG, outdoor play space and equipment for LAP/LEAPS(s). For example, no more than 95% of the dwellings to be occupied until all Green Infrastructure has been laid out in accordance with an approved Green Infrastructure Phasing Plan and Management and Maintenance Plan.

5. Potential Off-site Recreation Improvements/Contribution

Having applied the Council's 'Social, Sport and Open Spaces Study – Developer Contributions Toolkit' (2017), the proposed development demands additional, off-site amenity/recreation space. Discussions are on-going with the relevant Council department to identify whether there are any required improvements and enhancements to existing recreational facilities within the local area. This could potentially take the form of improvements to children's play areas, sports pitches and allotments. Should improvements/enhancements be identified, any (proportionate) financial contributions towards such works would be secured by s106 obligations.

6. Implementation of applications 21/02828/OUT and 23/00728/FUL

Obligations to secure the implementation and completion of the above proposed developments within the retained southern part of the industrial estate alongside the delivery of the larger (215) residential scheme of application 21/02832/OUT. Trigger points and/or an agreed phased programme for the commencement and completion/occupation of three proposed developments will be imposed.

Public Sector Equalities Duty (PSED)

As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have "regard to" and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

In the context of the above PSED duties, this proposal is considered to be acceptable.

7. CONCLUSION/PLANNING BALANCE AND RECOMMENDATION

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise.

7.2 The relevant policies of the development plan are the starting point when considering this application. However, the policies which are most important for determining this application are out of date due to a shortfall in the Council's five-year supply of housing land. The proposal has therefore been assessed against the guidance contained within the NPPF. Paragraph 11(d) of the NPPF applies a presumption in favour of sustainable development unless:-

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.

- 7.3** In carrying out an objective assessment of the proposals (in line with NPPF paragraph 11d), officers have had to balance any potential adverse impacts of the proposals on the character of the site and wider locality, any implications associated with conflicts with Policy MD1/loss of employment land, the amenities of neighbouring land users and highway safety implications, against the positive contribution the proposal would make towards the Council's 5 Year Housing Land Supply and any wider economic or social benefits that the scheme might bring. In this regard, the contribution of up to 215 market and affordable dwellings towards meeting the Council's identified housing needs weighs heavily in favour of the proposals.
- 7.4** Despite some reservations about the height of the apartment buildings closest to properties Rowanfield Road, the indicative layout demonstrates that the site could potentially accommodate up to 215 dwellings and is therefore considered broadly acceptable. The illustrative layout incorporates appropriate green infrastructure/public open space and suitable pedestrian and cycle routes with connectivity to surrounding areas would offer appropriate sustainable transport opportunities.
- 7.5** In seeking to address the policy requirements of MD1, the applicant has demonstrated their commitment to short and longer term capital investment and public realm enhancements within the southern half of the estate, the detail and implementation of the latter to be secured by way of s106 obligations. In this respect, the application has been considered alongside applications 21/02828/OUT and 23/00728/FUL which would provide additional investment and improvements to LIE in the form of a smaller mixed use residential and commercial development and the relocation of the existing artists' studios in a bespoke new building within the southern half of the estate. The two schemes would be implemented alongside the construction of the 215 dwellings and their delivery secured by s106 obligations.
- 7.6** Subject to a viability review exercise at REM stage, the proposed development has the potential to deliver a level of affordable housing, which would make a valuable contribution to meeting the identified local housing needs of the borough.
- 7.7** The loss of the older, historic buildings on site is regrettable. The historic significance of some of the buildings and their architectural features have been explored and considered thoroughly. However, these buildings are not designated heritage assets and are afforded no protection. As such, the proposals would not result in harm to the significance of designated heritage assets. The industrial heritage of the site would be acknowledged through the installation of interpretation boards and industrial design references (as indicated in the example montage images provided by the applicant) would be considered and incorporated into the design of the buildings at REM stage.
- 7.8** Similarly, the extent and feasibility of retaining and adapting some or all of the existing buildings on site for either commercial or residential purposes has been adequately explored.
- 7.9** In response to changes in Building Regulations and the adoption of the Council's Climate Change SPD, the proposed sustainability strategy is considered acceptable and proportionate to an outline development proposal. All new dwellings would be provided with ASHPs or another non-gas alternative and EV charging points. Overall, the proposed development should achieve a reduction in CO2 emissions over that required by Part L of current Building Regulations.
- 7.10** The proposed access arrangements and traffic impacts of the proposed development have been fully scrutinised by the Highway Authority and no objection is raised. Similarly, there are no overarching amenity concerns associated with the outline proposals, subject to consideration of the detailed layout and design of the development and a noise impact assessment at REM stage.

7.11 Officers have taken account of any other social, economic and environmental benefits of the proposals and having assessed the proposals in accordance with NPPF paragraph 11(d), the 'tilted balance' in favour of sustainable development is engaged in this case and there are no other adverse impacts arising from the proposals that would significantly outweigh the benefits of the scheme and substantiate a refusal.

7.12 Recommendation

7.13 Resolve to grant outline planning permission subject to the conditions and the applicant entering into a Section 106 Agreement to provide:

- Affordable Housing (40 on-site units), including a viability review mechanism
- Education (11-16) provision
- Libraries provision
- Public Open Space delivery, management and maintenance (including BNG)
- Potential off-site improvements to green space/recreational facilities
- Implementation of applications 21/02828/OUT and 23/00728/FUL

7.14 A full list of suggested planning conditions and informatives, including confirmation of the applicant's agreement to any pre-commencement conditions, will follow in an update report.

7.15 The parties are in general agreement over the above Heads of Terms for s106 obligations and, at the time of writing, an initial draft agreement has been prepared and is in circulation.

7.16 It should be noted that a decision will not be issued by the Council until conclusion of the SoS EIA Screening request, in addition to completion of the s106 Agreements.

7.17 The Planning Committee should therefore resolve to either grant or refuse planning permission.

Consultations Appendix

GCC Highways Planning Liaison Officer

1st November 2023-

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection subject to conditions.

The justification for this decision is provided below.

This representation has been produced further to the Highway Authority's recommendation dated 3rd February 2022. The proposal seeks Outline planning permission with all matters reserved except for access for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings.

Layout

The estate internal highways and parking layouts are only suggested not confirmed. The response and recommendation can only cover those items submitted and does not include or imply no objection will come forward for items submitted at reserved matters, for example estate road layouts, parking design etc. To confirm, consideration must be given to policy SD4 of the Joint Core Strategy, paragraph vii which states:

New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should:

- (...) Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

Parking should be provided in accordance with the guidance set in Manual for Gloucestershire Streets – Addendum October 2021. For cycle parking, a minimum of 1 space is needed per 1 bedroom units, 2 spaces there afterwards.

The applicant should consider the revised contents of the National Planning Policy Framework (NPPF), particularly paragraph 131 which emphasizes the need for trees.

Highway Impact

An Automated Traffic Counter (ATC) survey was conducted to ascertain the volume counts for the existing site uses. The outputs of the survey demonstrated 61 and 53 two-way movements during the AM and PM peak times, respectively. However, at the time of the survey the northern part of the Lansdown Industrial Estate that provides around 17,000 m² of floorspace across light industrial (B2), general industrial (B2) and storage and distribution (B8) land uses, was underutilised. To quantify the potential trip generation for those uses, a TRICS assessment has been carried, and the outputs shows 119 and 120 two-way trips in the AM and PM peak times, respectively.

TRICS has also been used to calculate the likely number of trips likely to be generated by the development proposal. Based on the residential split of 88 houses and 132 flats, the analysis indicates that the proposed development site would generate around 74 two-way trips in the

Page 74

AM peak hour and 70 two-way trips in the PM peak hour. This equates approximately to 14 additional trips in the morning peak and 8 additional trips in the PM peak when compared to the existing surveyed flows for the periods of peak traffic generation at the site.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. There are no justifiable grounds on which an objection could be maintained.

Conditions

Site access

Prior to occupation of the development hereby permitted, the vehicular access via Rowanfield Rd shall be laid out and constructed in accordance with details first submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the safe and free flow of traffic onto the highway.

Offsite works (Details Provided)

The Development hereby approved shall not be occupied until the offsite works comprising:

Active Travel Connection as shown on drawing 05400-SK-007-P2.

Have been constructed and completed.

Reason: To ensure the safe and free flow of traffic onto the highway.

Reinstatement of Redundant Accesses

The vehicular access hereby permitted shall not be brought into use until the existing vehicular accesses to the site (other than that intended to serve the development) have been permanently closed in accordance with details to be submitted to and agreed in writing beforehand by the Local Planning Authority.

Reason: In the interests of highway safety.

Electric Vehicle Charging Points (Residential)

Before first occupation, each dwelling hereby approved shall have been fitted with an Electric Vehicle Charging Point (EVCP) that complies with a technical charging performance specification, as agreed in writing by the local planning authority. Each EVCP shall be installed and available for use in accordance with the agreed specification unless replaced or upgraded to an equal or higher specification.

Reason: To promote sustainable travel and healthy communities.

Bicycle Parking

The Development hereby approved shall not be occupied until sheltered, secure and accessible bicycle parking has been provided in accordance with details which shall first be submitted to and approved in writing by the Local Planning Authority. The storage area shall be maintained for this purpose thereafter.

Reason: To promote sustainable travel and healthy communities.

Construction Management Plan

Prior to commencement of the development hereby permitted details of a construction management plan shall be submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the demolition/construction period. The plan/statement shall include but not be restricted to:

Parking of vehicle of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);

- Advisory routes for construction traffic;
- Any temporary access to the site;
- Locations for loading/unloading and storage of plant, waste and construction materials;
- Method of preventing mud and dust being carried onto the highway;
- Arrangements for turning vehicles;
- Arrangements to receive abnormal loads or unusually large vehicles;
- Highway Condition survey;
- Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.

Informatives

Works on the Public Highway

The development hereby approved includes the carrying out of work on the adopted highway. You are advised that before undertaking work on the adopted highway you must enter into a highway agreement under Section 278 of the Highways Act 1980 with the County Council, which would specify the works and the terms and conditions under which they are to be carried out.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk allowing sufficient time for the preparation and signing of the Agreement. You will be required to pay fees to cover the Councils costs in undertaking the following actions:

Drafting the Agreement

A Monitoring Fee

Approving the highway details

Inspecting the highway works

Planning permission is not permission to work in the highway. A Highway Agreement under Section 278 of the Highways Act 1980 must be completed, the bond secured and the Highway Authority's technical approval and inspection fees paid before any drawings will be considered and approved.

Street Trees

All new streets must be tree lines as required in the National Planning Policy Framework. All proposed street trees must be suitable for transport corridors as defined by Trees and Design Action Group (TDAG). Details should be provided of what management systems are to be included, this includes root protections, watering and ongoing management. Street trees are likely to be subject to a commuted sum.

Impact on the highway network during construction

The development hereby approved and any associated highway works required, is likely to impact on the operation of the highway network during its construction (and any demolition required). You are advised to contact the Highway Authorities Network Management Team at Network&TrafficManagement@gloucestershire.gov.uk before undertaking any work, to discuss any temporary traffic management measures required, such as footway, Public Right of Way, carriageway closures or temporary parking restrictions a minimum of eight weeks prior to any activity on site to enable Temporary Traffic Regulation Orders to be prepared and a programme of Temporary Traffic Management measures to be agreed.

No Drainage to Discharge to Highway

Drainage arrangements shall be provided to ensure that surface water from the driveway and/or vehicular turning area does not discharge onto the public highway. No drainage or effluent from the proposed development shall be allowed to discharge into any highway drain or over any part of the public highway.

Construction Management Plan (CMP)

It is expected that contractors are registered with the Considerate Constructors scheme and comply with the code of conduct in full, but particularly reference is made to “respecting the community” this says:

Constructors should give utmost consideration to their impact on neighbours and the public

- Informing, respecting and showing courtesy to those affected by the work;
- Minimising the impact of deliveries, parking and work on the public highway;
- Contributing to and supporting the local community and economy; and
- Working to create a positive and enduring impression, and promoting the Code.

The CEMP should clearly identify how the principal contractor will engage with the local community; this should be tailored to local circumstances. Contractors should also confirm how they will manage any local concerns and complaints and provide an agreed Service Level Agreement for responding to said issues. Contractors should ensure that courtesy boards are provided, and information shared with the local community relating to the timing of operations and contact details for the site coordinator in the event of any difficulties. This does not offer any relief to obligations under existing Legislation.

County Archaeology

26th January 2022 -

I have noticed this application on the planning list and have checked against the county Historic Environment Record. I can advise that the proposed development was the site of a World War One aircraft factory known as the Sunningend Factory and some of the buildings are still standing. Historic maps shows the industrial development of the site since the late 19th century. There has been no archaeological investigations close to the proposed development site however there may be potential for as yet unrecorded archaeological remains to be present within the site despite a high degree of development in the post-medieval period.

The site has the potential to contain upstanding remains of industrial interest, particularly relating to the World War One aircraft factory. Despite the post-medieval development of the site there is potential for archaeological remains to survive within the site. I therefore recommend that a Historic Environment Desk Based Assessment should be submitted with the application and I will be happy to advise further once this information is made available.

6th November 2023-

The Heritage Appraisal (June 2022) has been produced since my initial comments on the application. I consider this appraisal has addressed my request for an assessment on the heritage interest in the site, in particular any upstanding elements which still hold industrial heritage value. The appraisal has provided a useful summary of the history of the site which has established the heritage interest in the site's development in the 19th century as the Lansdown Iron Works/Trusty Engine Works and H.H. Martyn & Co.'s various manufacturing operations and important role as an aircraft factory during WWI and WWII.

Despite the heritage interest in the historical development of the site it is clear that due to much alteration during the post-war period very little of architectural or heritage interest is left in the upstanding fabric of the site (or those buildings which have been recently demolished).

The appraisal also states there is little surviving machinery left to document any important technological developments.

On the basis of Heritage Appraisal I therefore consider that no building surveys are necessary and due to the extent of alteration and subsequent development within the site I consider it unlikely that any belowground archaeological remains of interest will be impacted by the proposals. I therefore make no recommendations for further investigation in relation to this application. The Heritage Appraisal will be deposited with the Historic Environment Record as a useful account of the historic development of the site

Contaminated Land Officer

3rd August 2022 - 21/02832/OUT - Con Land comments:

I do not wish to raise any objection to this application from a contaminated land perspective although it is worth noting that there is the potential for considerable risk given the historical uses of the site. This is well documented in the desk study and numerous recommendations are made in section 10.2 of the report which I fully support. These recommendations can be picked up at a later stage in the planning process and so I can support the application with the caveat of a further report being submitted at a later date with the findings of the proposed ground investigation.

Environmental Health

24th June 2022 - 21/02832/OUT –

I have read through the design and access statement and I have been looking for a noise assessment but I can't seem to find one. Obviously building so close to a rail line is going to be tricky in terms of noise control but some of the design options do try to make use of orientation and screening which is going to be the only way to make this development possible. A detailed noise report is required to understand the impact of the railway on these residential units with detailed façade specifications. I would suggest designing the apartment blocks closest to the railway with kitchens, bathrooms and any staircases facing the rail line to help with noise control within more sensitive rooms. My preference is always to try and ensure that residential units can have openable windows rather than making use of mechanical ventilation.

Social Housing

28th November 2022 - Letter available to view in documents tab.

GCC Community Infrastructure Team

9th June 2022 - Comment available to view in documents tab.

Minerals And Waste Policy Gloucestershire

4th February 2022 - Comment available to view in documents tab.

Strategic Land Use Team

19th May 2022 –

The outline application is for the redevelopment of the northern part of Lansdown industrial estate (2.76ha) for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.

The application site forms part of the Cheltenham Plan allocation MD1 and Policy H2: Land allocation for mixed-use development. This aspect is the focus of the response.

Policy H2 states that

"Each allocation is supported by site-specific policies MD1-MD4 below, to provide further detailed guidance on the development of these sites. These site-specific policies also form part of this policy."

Policy MD1 has the following description:

"The site is capable of redevelopment for mixed-use, including a continued element of employment in better-quality units together with some new residential development. There would be a net loss of employment land but this should be offset by an upgrade in the quality and density of premises."

It also includes the following requirement:

"Employment led regeneration which may include an element of residential development provided that existing provision is offset by a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site"

The current application does not meet with the above requirements. It would result in the total loss of employment from the site to be replaced by housing. There would be no mixed-use redevelopment at all and nor would there be any upgrade to any employment premises.

The application does not conform to the letter or spirit of Policy MD1. This fact should be afforded significant weight in determining the application.

A separate application on a different part of the Lansdown Industrial Estate (21/02828/OUT) is also currently under consideration. The application seeks to redevelop two commercial units into a mix of residential units and commercial. Whether the impacts of the application can be taken into account when determining 21/02832/OUT is not clear and will require a legal agreement to link the two.

If we assume that both applications can be considered jointly then the proposals would still not meet with Policy MD1. The development would be some distance from being 'employment led regeneration'. There would be a loss of approximately 2.76ha of employment land compared to approximately 290sqm of renovated commercial floor space. There is no evidence to justify that this would result in 'a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site'.

GCC Local Flood Authority (LLFA) 1

18th February 2022 –

I refer to the notice received by the Lead Local Flood Authority (LLFA) requesting comments on the above proposal. The LLFA is a statutory consultee for surface water flood risk and management and has made the following observations and recommendation based on the Flood Risk Assessment and Drainage Strategy (August 2019).

Flood Risk

The site is in flood zone 1 and Risk of Flooding from Surface Water maps show just a minor area of risk that can likely be dealt with by the onsite drainage.

Surface water management

Discharge strategy

Page 79

No soakaway tests have been carried out so it is not known whether infiltration will be a suitable option (it is proposed that these will be done prior to detailed design). There are no watercourses in the vicinity, so the proposed discharge strategy is to a public sewer.

There are plenty of surface water sewers in the area that would be preferred to the combined sewer in Rowanfield Road identified in the drainage strategy. Ultimately this will be determined by the site's current drainage network and negotiations with Severn Trent Water but there are clearly options if infiltration is not possible.

Discharge rates

It is stated that restricting the discharge rate to the greenfield runoff rate for QBar is impractical. In this situation the development should seek to try and reduce the discharge rate by at least 40%, which is quoted in the drainage strategy document but not demonstrated has been met. This is especially important to understand if the development will discharge into a combined sewer.

It is proposed that some areas of the development will be restricted to 2 l/s, which will seemingly provide a reduction in the discharge rate, but the percentage reduction has not been calculated.

Some of the details in the drainage strategy appear to be inconsistent with other documents. For example, the drainage strategy states that Buildings 5, 6, 7 and 8 are remaining so won't be included in the alterations of the drainage strategy (see Appendix E), however, the Illustrative Masterplan shows that these buildings will be replaced by residential housing. It is also stated that the site area is 5.36 ha but the Application Boundary plan shows suggests it is more like 2.78 ha. This is important to get right because it will have implications on the appropriate discharge rate.

Estimates of the current discharge rate and proposed discharge rate should be provided and agreed prior to approval to provide a basis for a more detailed drainage strategy to be designed around.

Drainage strategy and indicative plan

Again, as described above, the layout of the site should be clarified, and the drainage strategy should reflect this. As for the method of storage, this appears to be based on underground storage crates that will provide sufficient control on water quantity but will not offer any management of water quality, amenity, or biodiversity aspects of Sustainable Drainage Systems (SuDS). The Illustrative Masterplan and Parameter Plan does show some green open spaces that could be utilised for above ground storage or filter strips to manage water quality, which should be explored.

Climate Change

It is stated that the drainage design has incorporated a value for climate change of 40%, however, it's not clear how this has been done.

Exceedance flow plan

An exceedance flow plan has not been provided; however, this will depend on the final topography of the site and can be supplied alongside a detailed drainage design.

LLFA Recommendation

The final discharge rate should be established and agreed prior to approval to ensure the detailed design has a basis to be designed around. Similarly, the layout should be clarified, and it should be demonstrated how climate change has been incorporated into the design.

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

GCC Local Flood Authority (LLFA) 2

9th January 2024 –

I refer to the notice received by the Lead Local Flood Authority (LLFA) requesting comments on the above proposal. The LLFA is a statutory consultee for surface water flood risk and management and has made the following observations and recommendation.

The latest Flood Risk Assessment and Drainage Strategy (Project Code: 04107) uploaded to the planning portal website on 22 December 2023, provides more assurances that the discharge rate will be limited to 18.2 l/s, which is approximately equal to the greenfield runoff rate for QBar. For this location and nature of development, the remaining drainage strategy can be provided through the following condition:

Condition: No development shall commence on site until a detailed Sustainable Drainage System (SuDS) Strategy document has been submitted to and approved in writing by the Local Planning Authority, this should be in accordance with the proposal set out in the approved submission (Flood Risk Assessment and Drainage Strategy; 22 December 2023). The SuDS Strategy must include a detailed design, a timetable for implementation, and a full risk assessment for flooding during the groundworks and building phases with mitigation measures specified for identified flood risks. The SuDS Strategy must also demonstrate the technical feasibility/viability of the drainage system through the use of SuDS to manage the flood risk to the site and elsewhere and the measures taken to manage the water quality for the lifetime of the development. The approved scheme for the surface water drainage shall be implemented in accordance with the approved details before the development is first put in to use/occupied.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage, flood risk and water quality in the locality.

Condition: No development shall be brought in to use/occupied until a SuDS management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime, has been submitted to and approved in writing by the Local Planning Authority. The approved SUDS maintenance plan shall be implemented in full in accordance with the agreed terms and conditions.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding.

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed

sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

Clean Green Team

21st January 2022 –

1 Pathway Pathways need to be of hard standing

2 Bins Locations If private dwellings residents would need to be informed that due to ownership they are required to present on the kerbside for 7am on the morning of collection. No receptacles are to be stored on the highway

3 Road Layout Ideally off road parking is advisable with a space for refuse and recycling trucks that is to be kept free on collection days. Ideally on the highway a turning circle is recommended. The road will need to withstand 26 tonnes and until the road is finished Ubico and CBC can not be held responsible for any damage. If access is not permitted whilst the road is still being finished then all properties would need to present at the nearest adopted highway on collection day

4 Presentation Points (if single dwellings) The properties would need a position near the kerbside to present bins, boxes, caddy's and blue bags that would avoid blocking access to the pathway or driveways.

5 Storage of bin and boxes for single dwellings Property's need adequate space to store bins and boxes off the public highway when not out for presentation

6 Communal If any of the property's are to be communal then a bin shed will need to be planned. The bin shed needs to be of adequate size to house all the receptacles needed for the occupancy. Ideally the bin shed should be no further than 30 metres away from the adopted highway as per the planning guidance document, and the pathway leading to the bin shed must be of hard standing

7 Entrance to estate Entrance to the estate needs to have parking control to prevent parking on the corners which prevents ingress and egress of refuse vehicles up to 26 tonnes

8 New residents information "We would advise that all residents are given the link below so they can see how and what can be recycled in Cheltenham
https://www.cheltenham.gov.uk/info/5/bins_and_recycling/924/kerbside_recycling_box_collection "

Heritage and Conservation

28th March 2022 –

Re: Heritage advice 21/02832/OUT - Lansdown Industrial Estate, Gloucester Road, Cheltenham

The site lies outside but adjacent to the Central Conservation Area and despite not having any designated heritage assets, the Lansdown Industrial Estate is notable as an historic industrial site, principally associated with the iron industry. A comparison of historic maps and a site visit indicates a number of surviving historic industrial buildings and structures that may be considered to have significance. Notably all buildings and structures on site are proposed for demolition.

The supporting information submitted within the outline application gives a weak understanding of the history of the site and the surviving historic industrial building and structures. It is desirable a more robust analysis of the history of the site and the existing buildings and structures, particularly those surviving from the c19th and early c20th, be undertaken. This would allow an informed decision to be made on their historic significance.

Without this understanding it is difficult to support the application in heritage terms. This lack of supporting information and therefore understanding of the potential for heritage assets on the site could be used as a reason for refusal of the outline application.

After an analysis of the site, should any of the surviving buildings and structures be considered to be significant, consideration will need to be given to the appropriateness of their retention, either wholly or partially, or whether the sites industrial heritage be better referenced in other ways, e.g. within the design of the new buildings and/or interpretation boards on the site. The development proposals response to the site will need to be proportionate to any significance and consideration will need to be given to chapter 16. Conservation and enhancing the historic environment, within the National Planning Policy Framework.

Cheltenham Civic Society

8th February 2022 - Comment available to view in documents tab.

RESPONSE TO HERITAGE AND BUILDING REPORTS

1. Cheltenham Civic Society wishes to lodge the following additional comments on the application. These are submitted with the benefit of deep local knowledge, primary research and a strong interest in the area. These same traits are, unfortunately, not demonstrated in the application.

Conservation Report.

2. Cheltenham Civic Society asked our historian, Jill Waller, to assess the applicant's updated heritage appraisal. Jill is probably the most authoritative local historian, having had numerous books and papers published on Cheltenham. She is also believed to be the only historian who has conducted primary research into the Lansdown Industrial Estate site, except for John Whitaker who wrote 'The Best' (Whitaker, 1985) about HH Martyn.

3. Jill could not believe how much the appraisers had got wrong about the site's history, right from the start, and how little they had actually researched and understood, apparently because they relied on outdated sources. Attached is her critique of the heritage appraisal, complete with highlighted heritage report. Her exceptional knowledge also satisfies NPPF para 194, which requires, as a minimum, the relevant historic environment record to have been consulted and the heritage assets assessed using appropriate expertise where necessary.

4. The bottom line is that the latest heritage appraisal is still far from satisfactory. As the Conservation Officer points out in his second submission, the assessment is very thin on detail and still fails to demonstrate a thorough understanding of the site, and thus the significance of it.

5. CBC's Conservation Officers rightly identify that industrial buildings, by their nature, do not necessarily have an aesthetic value but they can hold evidential, historical and communal value. The following detail is provided to assist CBC's Conservation Officers, Planning Officers and decision makers with understanding the specific significance of the site, and filling in the detail omitted by the applicants' heritage report.

6. Jill Waller's and Andrew Booton's assessment of the site's buildings, drawn from primary evidence including CBC's records, planning application dates, construction dates and uses, maps and plans and interviews with former employees. This should help CBC to assess the heritage significance of this site, which the applicant's heritage report fails to do. All these buildings can be identified in Historic England's aerial photos, which help to confirm their appearance and relative positions. The plan shows:

- A. Tramshed, c1890-1901. Trusty's foundry, survived fire in 1897. Sits on the site of Cornell's original 1864 foundry so may have been used by Vernon & Ewens before Trusty. Probably the oldest structure on the site and despite being excluded from this planning application, is important for understanding the setting and context.
- B. Tram Offices, 1901. Date stone identifies this. Again, outside the scope of this application but important for historical context.
- C. Block C, c1907-08. Probably one of the first things Martyn's built, for their very messy fibrous plasterwork as well as asbestos work and woodcarving. Bears legible 'ghost signs' from Martyn's activities on the railway track side. Of interest, this building also appears to have good examples of beam and pot concrete floors, which must be amongst the earliest in the country. This is all the more worrying as the building already has consent for demolition yet it is worthy of formal listing.
- D. Woodshop, c1908-16. The building with the largest footprint for creating and assembling large structures.
- E. Toilet Block, 1917. Arts and crafts brick building.
- F. Canteen Block, 1917. Underneath the roughcast exterior and modern inappropriate uPVC windows is a handsome arts and crafts brick building of domestic style and proportion.
- G. The Foundry, 1920. 'At its height from 1920 to around 1938, Martyn's foundry cast 75% of all art metal work required in the country.' The Best, p99, Whitaker, J. This was the actual building from which that output originated, purpose built for the task and largely unaltered.
- H. Pressed Steel Shop, 1942. Constructed on the footprint of a previous building after a direct hit at the southern end on 11 December 1940. Contemporary to the Martyn's new office block (planning permission granted December 1941) that was completed in the southern site as the previous office had been destroyed. Incidentally, this later office has been used to showcase the firm's range of plasterwork, carvings and fittings, most of which remain in place.
- I. Polishing shop, 1942. The end of the Woodshop was bomb damaged so was made good.

Building Report.

7. The building report by Bruton Knowles clearly shows that the buildings are capable of renovation and reuse. Indeed, their overall sizes, solidity and layouts lend themselves very well to reuse for a range of commercial and residential purposes. Dilapidation through neglect should not be an excuse for simply demolishing them without full and detailed consideration for renovation and reuse. NPPF para 196 states that 'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.'

Protection

8. The heritage report is sadly passive on the significance of heritage and the damaging impact of this proposal on Cheltenham's industrial heritage. NPPF para 190 states (with our emphasis in italics):

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

We do not believe that this application satisfies those considerations. Indeed, they deliberately contravene them. That is very disappointing and indicate underestimation of the importance of heritage, laissez faire approach to heritage management and consequent risks to the town's heritage. Cheltenham Borough Council has a duty to take a lead in setting out a positive strategy for the conservation and reuse of the site.

Alternative Proposals

9. Cheltenham Civic Society's letter and brief to all councillors of Cheshire West & Chester Council and Cheltenham Borough Council (attached) sets out the site's historical context. Importantly, it also sets out the Civic Society's proposal to retain buildings of historic interest but to demolish the poor quality buildings around them for enabling development. This satisfies NPPF para 197, which states that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Our letter and brief to councillors (attached) provides sufficient evidence to satisfy all 3 factors, unlike the applicant's submissions. Our proposals demonstrate not only the desirability to retain the historic fabric but the commercial, heritage and cultural rationale for doing so.

Conclusion

10. From the information we have provided, it should be evident that not only should the planning application be refused but Lansdown Industrial Estate should be formally protected for its historical, evidential and architectural value and its specific contribution to Cheltenham's industrial heritage. Long term protection would best be served by finding a sustainable use for the buildings, which Cheltenham Civic Society has proposed and demonstrated feasibility. We urge Cheltenham Borough Council to refuse the application and to take steps to protect this important site, which is likely to be the last industrial site in Cheltenham of significant heritage importance.

Ward Councillors

28th January 2022 –

I am concerned that the buildings that will be demolished to make way for the new housing include a fantastic community, and indeed our largest community of artists, in Lansdown Art Studios.

During your assessment can you consider which parts of the NPPF, JCS or Cheltenham Plan would support the provision of space for this community organisation in the new designs. We're looking for space for 21 artists with good light and a reasonable rent. Would it be possible for the developer to create an attic space on the blocks of flats to replace this fantastic resource?

250 years ago, Cheltenham was little more than a tiny village in Gloucestershire. Yet, within a few decades, it became a world-famous Regency spa town. A leading destination for art, literature, fashion, health and education. - David Chadwick (local resident)

At what point and how do we raise this with the developer? In your experience, what is the best approach to getting such a commitment?

Ecologist 1

12th June 2023 –

We have reviewed the Ecological report and shadow Habitats Regulations Assessment (SHRA) and our response with regards to Ecology is provided below.

Requirements prior to determination:

1. Desk study for protected species records and sites of nature conservation concern to be undertaken to inform the ecology/bat reports.
2. Bat emergence survey of buildings 1 and 2 with low bat roosting potential should be undertaken and a report submitted to the local planning authority for review. Should bats emerge then two further dusk or dawn surveys are required to characterise the roost and the results should be submitted to the local planning authority (LPA) for review. Should bats be present, the report should include a bat mitigation and enhancement plan.
3. A Biodiversity Net Gain (BNG) assessment using current version of DEFRA BNG metric to demonstrate positive net gain should be submitted to the LPA.
4. The shadow HRA concluded that the number of regular visitors traveling to Cotswold Beechwoods SAC from the proposed development would be minimal. However, this potential for a small number of visits from the new development in combination with other local developments was recognised. As mitigation a Homeowner Information Pack (HIP) was therefore proposed. The HIP will provide information on other areas of attractive and more convenient public open space and opportunities for informal recreation in the local area to direct new homeowners away from the Cotswold Beechwoods SAC. The HIP should also show footpaths/cycle paths and public transport routes to these other greenspaces to deter use of cars. The HIP must also give best practice guidance for members of the public to minimise their impact on local sites of nature conservation concern too. Following the production and dissemination of the HIP to new residents, the shadow HRA concluded that the proposed development of the site was unlikely to result in any significant adverse impacts on the Cotswold Beechwoods SAC, either alone or in combination.

Requirements prior to commencement/conditions to be attached to planning consent:

1. Mitigation measures for protected species are to be undertaken as outlined in the Ecology report and subsequent bat report, once the latter has been reviewed by the local planning authority.
2. Should roosting bats be present, then evidence of a Natural England bat licence should be submitted to the local planning authority prior to commencement on site.
3. Prior to commencement, a "lighting design strategy for biodiversity" for the boundary features and any native planting shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- Identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
 - Show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.
 - All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority
4. Enhancement measures are to be undertaken as outlined in the Ecology and LPA reviewed bat reports and should be expanded upon in the form of a Landscape and Ecological Management Plan (this will need to cover a 30 year period) to support the BNG assessment, thereby ensuring that the positive biodiversity net gain can be achieved. The landscape plan should also show the location of relevant wildlife features.
5. The HIP needs to be submitted to the LPA for review prior to distribution to new residents.

National Planning Policy Framework (NPPF) and Local Plan Policy (Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031) (adopted December 2017)) Context:

- NPPF Para 170 – 182 (Conserving and Enhancing the Natural Environment), National Planning Policy Framework¹

1 The National Planning Policy Framework (NPPF) Paragraph 179 states:

“To protect and enhance biodiversity and geodiversity plans should:

- SD9 Biodiversity and Geobiodiversity
- INF3 Green Infrastructure

The Environment Act 2021 contains provisions for the protection and improvement of the environment, including introducing biodiversity net gain (“BNG”).
Cheltenham Plan, Adopted 2020.

- Policy BG1: Cotswold Beechwoods Special Area of Conservation Recreation Pressure
- Policy BG2: Cotswold Beechwoods Special Area of Conservation Air Quality

Wildlife legislation context:

- Wildlife and Countryside Act 1981 (as amended)
- Conservation of Habitats and Species Regulations 2017
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992

We trust this information is helpful.

Ecologist 2

11th October 2023 -

I have reviewed the BNG metric and report, and welcome the positive BNG for habitats. I note the comments from the consultant in their email and the section in the BNG report (inserted FYI) explaining the negative value for hedgerows, which results in the BNG trading rules not being met:

The proposed development and associated landscaping will result in a significant habitat net percentage change of +2022.00%. The removal of a short section of ornamental hedgerow with no new hedgerow proposed results in a net percentage change of -100% (-0.04 units).

New hedgerow planting as part of the proposed development should be considered in order to achieve a net gain in the biodiversity value of hedgerows on the site. It is expected that the required specification and/or length of new hedge will be easy to incorporate into the development once a full landscape design has been produced.

However, it will be necessary for the development to demonstrate a positive BNG for hedgerows, ideally through on-site hedgerow creation, and thus meet the BNG trading rules for hedgerows to ensure a valid BNG assessment. I would therefore recommend that the outline landscape plan plots the outline positioning for native species-rich hedgerows within the development (with the understanding that precise locations/lengths may change), and thus ensures a positive BNG can be achieved for this habitat (with the understanding that the precise positive BNG value may change slightly at the detailed planning stage but not so much as to yield a negative BNG value).

Joint Committee Of National Amenity Societies

14th February 2022 –

The Association for Industrial Archaeology notes that this outline application is for the demolition of the existing buildings and the redevelopment of the northern part of the Lansdown Industrial Estate. The redevelopment proposal is for up to 215 dwellings with associated access roads, parking and public open space.

This site includes buildings which housed Cheltenham's industrial enterprises including HH Martyn. They had taken over the Vulcan Works before the First World War and which were renamed the Sunningend Engineering Works. From 1915 they were producing aircraft and subsequently worked under the name of the Gloucestershire Aircraft Co. An aerial photo taken in 1928 has the name Sunningend Engineering Works, and a building has the word "Aerodrome" on its south east facing elevation.

Today, a number of the buildings associated with these industrial enterprises appear to survive to at least a limited extent as indicated by a number brick walls, painted and unpainted, illustrated on pages 18 and 19 of the Design and Access Statement. Some of the red brick buildings may have been part of the engineering works. Also, it is possible that the two storey white painted building is not as modern as it appears and may be the one which had "Aerodrome" on it. Given the importance of all the works not only to Cheltenham's history but also in connections with the county's long standing connection with air craft production, it would have been useful if there had been a more detailed historic building/site assessment included with the papers. (The only details on the site's history are within the Design and Access Statement.) This lack of information could be addressed so that historically important buildings can be identified and their function understood. Overall, effort should be made to retain and reuse the relevant buildings. The reuse of buildings would also mitigate the carbon footprint which would result from complete new build. Therefore the Association for Industrial Archaeology objects to this application.

Building Control

21st January 2022 - The application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

GCC Community Infrastructure Team

14th December 2022 - Letter available to view in documents tab.

Gloucestershire Centre For Environmental Records

25th January 2022 - Biodiversity report available to view in documents tab.

Ward Councillors

6th December 2022 –

This site was a centre for significant innovation, and while many of our residents aren't aware of its history, there are still remarkable and irreplaceable heritage buildings on site that we lose with the proposed development. The area is also historically working-class, and Cheltenham still suffers from extreme inequality that's masked by our reputation as a spa town for wealthy people. It's vital to preserve the legacy of hard-working people who are otherwise invisible with their contributions and skills forgotten.

In addition, the most climate-friendly buildings are those already standing, and this is a resource that we can't really afford to lose. We will come to regret this in years to come if it goes ahead. If it must go ahead, a sensitive redevelopment should be at least attempted or examined, for the purpose of due diligence and municipal accountability.

Councillor St Pauls ward

Heritage and Conservation

8th September 2022 –

Re: Additional Heritage advice 21/02832/OUT - Lansdown Industrial Estate, Gloucester Road, Cheltenham

Further to the heritage advice given previously and the subsequently submitted Heritage Appraisal dated June 2022, by Built Heritage Consultancy, the following additional heritage advice is offered.

The submitted Heritage Appraisal has given some clarity to the previous concern over the weak understanding of the history of the site and the surviving historic industrial buildings and structures. The Heritage Appraisal discusses historical industrial and artistic development of the site and begins to give an understanding of the significance of the existing buildings within the application site. However, this, while informative, is not considered a sufficiently thorough understanding.

The Heritage Appraisal states many of the buildings on site are utilitarian and most have been extended, rebuilt and much altered. It finds little to no value in the surviving buildings, appearing to primarily base this on their aesthetic appearance or value. It is argued, this should be expected from an industrial site that has been active with varied uses for an extended period.

Historic England make it clear significance should be considered in a number of different ways. It should be noted industrial buildings by their nature do not necessarily have an aesthetic value. Industrial buildings can hold evidential, historical and communal value. The conclusions made within the Heritage Appraisal do not properly acknowledge these values. It is considered therefore the issue of understanding significance has not been soundly based on conservation principles, policies and guidance. More careful consideration needs to be given to identifying significance and how this could be better revealed within the development proposal.

It was previously stated and is reiterated here, should any of the surviving buildings and structures be significant consideration be given to their retention, in whole or in part, that industrial design be referenced in the appearance of new buildings and that interpretation boards and/or public art feature, to recognise the significance of the site. As submitted the development proposal is considered a lost opportunity to acknowledge and celebrate an important period of Cheltenham's industrial and artistic heritage.

Natural England

18th July 2022 –

Thank you for consulting NE. This proposal is in the 15.4km recreational Zone of Influence of the Cotswold Beechwoods SAC.

The consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. Natural England advises that a Habitat Regulations Assessment is required as the proposal has the potential to impact the SAC/SPA/RAMSAR.

It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

Please reconsult NE when the Habitat Regulations Assessment has been completed. We will respond to the consultation in full at this stage. NE will not be checking the LPA's website for updates. Re-consultation is therefore necessary to reactive this case with NE. Please note that our statutory response period for proposals effecting SSSI's (including European sites) is 28 days, therefore a 28 day deadline will apply on receipt of the consultation.

Architects Panel

18th February 2022 –

Design Concept

Although only an Outline application with all matters reserved apart from access, the submission includes proposals for new buildings and a site layout that the panel decided would be worth commenting on in the hope that these comments might assist the design process and result in a more appropriate design solution for this site.

The panel had no objection to the principle of demolishing a large section of the existing now redundant industrial buildings on Lansdown Industrial Estate to provide new residential buildings on this site. Thought has been given to alternative site layouts and the panel liked certain aspects of the design proposals which could be worked up to create an attractive relatively dense urban housing development. However, the panel concluded the design should be refined to address the following:

General Site Layout

The layout options considered are clearly looking to maximise building density which is understandable for such a large site close to the town centre. However, all the layouts considered give great emphasis on the car resulting in a series of terraces dominated by rows of car parking spaces. The layouts are unimaginative and spatially uninspiring, giving very little to public amenities or distinctive place-making opportunities.

The Cheltenham Plan

The Cheltenham Plan (adopted July 2020) Policy MD1 states that Lansdown Industrial Estate is for employment led regeneration which may include an element of residential development. This application doesn't look at the site as a whole but simply divides the site into two. No details are provided to demonstrate upgrading the quality of remaining industrial estate or how these buildings relate to the proposed housing scheme.

The site calls for a mixed use employment led development which means there needs to be shops and business use facilities incorporated in the overall master plan. This in turn will encourage a more urban design solution, more open spaces, public amenity gardens and

enclosures, variety of built form and densities. Facilities could include work-live units and a broader range of premises. Greater emphasis on place-making features will help raise the status of the site and provide a focus for people in the area to meet and enjoy public interactions.

Built Form

It may not be viable to repurpose the existing industrial buildings on the site but their built form could certainly influence the new development and provides the opportunity for large buildings along the railway line boundary. Rather than be exclusively for apartments these buildings could have other uses at ground floor level in addition to car parking. Such tall buildings need more space around them so as not to overshadow other buildings or gardens between, and taking out the central terrace would help open up the site. Increasing the density of buildings elsewhere on the site may also be possible and changing the house pattern at the end of the row, or at key vistas, would add more variety to what currently looks like a very monotonous row of identical houses leading to no-where.

The architectural precedents included in the Design and Access Statement are welcomed and should be studied in detail when developing the architectural language for the whole development. The saw-tooth roof profile of the existing industrial buildings are precedent for an exciting and varied roofscape and it would be good if this silhouette could be included on the apartment buildings with reference to historic built form on the site.

Rowanfield Road

The proposed three storey houses along Rowanfield Road all have parking in their front gardens which is not ideal in terms of safe vehicular access or for visual reasons. Alternative layouts need to be explored.

HERITAGE APPRAISAL – LANSDOWN NORTH, June 2022 COMMENTS, JILL WALLER, Local Historian

General Comments – The Appraisers have used out-of-date sources and a considerable amount of the history of the Lansdown Industrial Estate has since been uncovered, either published or soon to be published. As the only person to have fully researched the history, it is a shame that they did not contact me.

Recent Sources:

- *A Chronology of Trade & Industry in Cheltenham*, Jill Waller et. al., CLHS, May 2022
- *Cheltenham's Forgotten Heavy Industry – The Lansdown Industrial Estate*, Jill Waller, article to be published in *CLHS Journal*, 2023.

pp.4-5 – The overlay of Lansdown North has been drawn in the wrong position on the 1835 Inclosure map. The 'Rail Road' is the horse-drawn railroad, opened 1810, closed 1850s, which ran along **Gloucester Road**, joined by a branch from the Leckhampton Quarries, and ending at Gloucester Docks. It is NOT on the line of the Birmingham & Gloucester Railway. – The Appraisers have overlooked an important aspect of Cheltenham's history, and confused Gloucester Road and tramroad with the future steam railway line. The Lansdown North site is thus further west and at a different angle.

p.4 – There is no evidence that the Bristol to Birmingham main line (Midland Railway 1840s) was in any planning stage in 1835 that would warrant placing the route on the 1835 Inclosure Award map.

p.4 – BOTH the new Midland Railway line AND the horse-drawn tramroad are shown on the 1855-57 Cheltenham Old Town Survey, which should have alerted the Appraisers that their overlay on the 1835 map was incorrect.

p.4 – Rowanfield Road was already a well-established path, interspersed with market gardeners' cottages, just not shown on the 1855-57 Old Town Survey.

p.4 – 'Cheltonia' – The reference here should be *An Historical Gazetteer of Cheltenham*, James Hodsdon, BGAS, 1997. ('Cheltonia' does not carry out any original research herself, nor often acknowledge her sources. The website should not be relied on for any serious or original historical referencing.)

p.7 – The Appraisers have missed the point that the 'Lansdown' Iron Works and Station are actually over half a mile from the actual Lansdown district, and why Cormell named it the **Lansdown** Iron Works. (He took the name from his premises in Tivoli Place, Andover Road, when he moved out to Alstone. – See sources above.)

p.7 – Recent research shows that Letheren built his own ironworks in the mid-1860s, while still working as Cormell's foreman. By 1868 he had left Cormell's employ and named his works the Vulcan Ironworks. – see sources above.

p.7 – The fate of John Cormell IS known – see sources above. (He returned to Tivoli and resumed his ironmongery and manufactory there until his death in 1897.) The Appraisers could also have mentioned that Cormell produced the iron roof covering the Bristol Corn Exchange courtyard, to the designs of E.M. Barry, RA, in 1871-2.

p.7 – No mention of John Gibbs' occupation of the Lansdown Iron Works, 1872-75 – produced gasworks around UK; supplied the ornamental iron fencing for Temple Gardens London. – sources above.

p.7 – Vernon & Ewens did NOT produce the Hammersmith suspension bridge. The 2004 source for this claim only states that they 'won the contract' to build the bridge. (In fact they went into bankruptcy shortly before the work was to start, and it was ultimately built by Messrs Dixon, Appleby & Thorne.) – see sources above. (However, Vernon & Ewens did carry out many large, prestigious contracts around the UK, e.g. the roof of Bristol Temple Meads; the Great Eastern Railway goods depot at Bishopsgate which was one of the largest warehouses in London, a battery at Maker Heights, etc.)

Page 92

p.7 – The railway sidings were laid to the works from the adjoining Midland railway in **1879**.

p.7 – Might have been worth mentioning that the ‘two small cottages’ were built by Letheren.

p.7 – ‘Montpelier’ should be Montpelllier – careless!

p.9 – Perhaps could have mentioned that the Trusty engines were made to patents taken out by J.E. Weyman with John Henry Knight (the early motor car pioneer); the latter’s own vehicles included his patented 3-wheeled motor driven by a Trusty oil engine.

p.9 – ‘most of the Central Iron Works buildings were retained and extended’ – INCORRECT. The Trusty Works suffered a devastating fire in January 1897, and **only the foundry** remained. Almost all the buildings shown in the 1899 engraving were built between 1897 and 1899. (Only Letheren’s and the site of the future tram depot were pre-1899.) – The source of the engraving: advertisement in the *Penny Pictorial*, 1899.

p.13 – The Vulcan Ironworks was acquired 4 June 1908 – see sources above.

p.13 – H.H. Martyn & Co. was founded in 1888 at Sunningend (the house on High Street), which although formerly Holly Cottage, was always Sunningend in their time; *i.e.* no need to mention ‘Holly Cottage’ or ‘later named Sunningend’. They retained the High Street Sunningend into the 1920s, mainly as showrooms.

p.13 – Lansdown site actually acquired Nov 1907, Martyn’s moved in Feb 1908. More could be made of Martyn’s renaming the site **Sunningend**, having been at the former High Street site for nearly 20 years.

p.13 – The Appraisers have missed that Martyn’s initially used the former Vulcan Ironworks as their own art metalwork department for their first few years at Sunningend, Lansdown. The Cumberland Screen would have been worked on in this now-demolished building.

p.13 – Brockworth Aerodrome and Brockworth site, not Hucclecote at this time.

p.17 – It was definitely a water tower – see earlier aerial photographs; destroyed by bomb Dec 1940.

p.17 – ‘the same period’ is a bit vague. Canteen & toilet block 1917-18; foundry 1920. – above sources.

p.17 – Unit 11 (Block C) was built c.1908 for fibrous plasterwork. The role of this and Unit 12 (Vulcan Ironworks) IS known – see sources above. Unit 12 initially continued in use by Martyn’s for their art metalwork. (Once a new art metalwork department had been built, it was used to house A.W. Martyn’s Bentley when he was on site, until bought by the bus company for use as a garage.)

p.18 – These photographs are dated **1920** – copies given to me personally by John Whitaker, (who has since deposited his archives in Gloucestershire Archives).

p.21 – Brockworth, not Hucclecote.

p.21 – Prestigious works should include the 1921 Angel of Victoria, the revolving 16ft bronze statue atop the Queen Victoria Memorial, Kolkata (Calcutta).

p.21 – *re.* Maples takeover – Martyn’s undertook Maple’s architectural manufacture and a portion of their general manufacture.

p.21 – *re.* destruction of records – the 1888-1940 records were lost in the Dec 1940 air-raid; more records were lost in a fire in May 1947. Maple’s apparently did instigate the disposal of the remaining records.

p.21 – Unit 7 was originally built as a dope shop for Second World War aircraft work.

p.21 – The single-storey extension to Unit 11 was later used for asbestos work, in the 1960s.

p.24 – The air-raid bomb also gutted H.H. Martyn's 3-storey brick office building, so far not mentioned by the Appraisers although clear on the earlier aerial photographs; near the water tower under the site of Unit 8. Hence the building of the new offices and boardroom in 1942, now Maxet House – not clearly explained by the Appraisers.

p.24 – Unit 7 was the purpose-built Dope Shop during the Second World War.

p.24 – The Trusty Works testing shed was erected between **1897** and 1899.

p.24 – new office building – the Appraisers have still not emphasised that this was erected because the original 3-storey office building (site Unit 8) was destroyed in the Dec 1940 air-raid.

p.28 – decorative work on ships 1947-66 – Actually until 1967. No mention of the fittings for the *QE2*, 1967.

p.28 – pre-fabricated houses – This was a large, important, contract, 'temporary' timber buildings, to help meet the post-war housing crisis.

p.28 – the Appraisers have run out of dates? Speaker's Chair 1950, St. Paul's pulpit 1964.

p.28 – 'right into the 1960s', should be into the **1970s**.

p.28 – 'Macolland's wound up Martyn's in 1971' – H.H. Martyn & Co. was closed on 31 Jan 1972.

p.31 – Platt Schindler Lifts Ltd, as the company was called at the time, took over Sunningend in **Feb 1972**.

p.31 – the two cottages at the northern end of the site were built by Letheren in the late 1860s.

p.34 – the Trusty engine-testing house (site Unit 1) was erected between 1897 and 1899. It might have been worth mentioning that H.H. Martyn used the northern end of Unit 1 to make packing-cases and an adjoining Polishing Shop, hence its proximity to the water tower because of the explosive fire risk.

p.38 – Post-war, Unit 2 was used by H.H. Martyn's as a pattern store.

p.39 – A former Martyn's employee recalls that Unit 2A was a 'self-service shop' in the 1960s, possibly one of Cheltenham's first.

p.40 – Units 3 & 4, canteen and toilet block, were built 1917-18; the 'canteen' was so much more to Martyn's workers, putting on Whist drives, dances and entertainments for up to 250 people over decades. (Could have been said under Section 2.4, The Sunningend Works of H.H. Martyn & Co.)

p.42 – Unit 5 (foundry) under construction, or remodelling, in 1920.

p.44 – The modern Unit 6 replaced the metalwork Fettling & Finishing department of H.H. Martyn's, with the pattern maker housed in the southern quarter.

p.46 – Unit 7 was originally built as the Dope Shop for Second World War aircraft manufacture. (The oral history from a former Martyn's employee confirms this.)

p.47 – Unit 8 – after the wartime aircraft production ceased, Unit 8 became Martyn's Pressed Steel department. (oral history, as above.)

Page 94

p.49 – Unit 11 is almost certainly pre-First World War, as Martyn's had extensive fibrous plaster contracts at that time.

p.49 – The original role of Unit 11 is known – fibrous plasterwork – very wet and messy work, which may explain the underground reservoir beneath the building. – This water storage is not mentioned by the Appraisers.

The Appraisers are unaware that the single-storey extension to the N of Unit 11 was used for asbestos work (1960s, oral history).

Cabinet making was carried out in Units 37-32 (site of). Unit 11 was used for assembling aircraft components and instruments.

p.49 – ALL the lettering relates to H.H. Martyn & Co.

p.49 – Comment – I suspect that CBC did not know the history or importance of this building in Apr 2018.

p.49 – incorrect picture caption – careless!

p.55 – Vulcan Ironworks established mid-1860s. Closed **1906**, not 1907.

p.56 – Unit 1 etc, testing shed – erected 1897-1899, following fire.

p.56 – Unit 2A – no historical interest, other than being Cheltenham's first self-service shop.

p.56 – Units 3 & 4 – canteen & toilet block constructed 1917/18.

p.56 – Units 3 & 4 – I disagree that the buildings are of negligible architectural interest – Arts & Crafts feel, softer, more 'domestic' architecture to contrast with the more brutal industrial buildings. Surely the gently tapering buttresses of the toilet block make for a less common style of building?

p.57 – Unit 7 – the building's role – built as the dope shop for aircraft production.

p.57 – Unit 8 – It became the pressed steel department after the war.

p.57 – involvement in aircraft production – It was much more than just plane tails!

p.58 – Unit 11 – date erected, see above.

p.58 – the role of Unit 11 – no mention of the original fibrous plasterwork use! Or aircraft instrument assembly. It was not used for marblework or sculpture (although possibly stained glass work on the top floor under the northlights) – the painted lettering on the east elevation is merely there to advertise Martyn's diverse manufacture to the passing rail and road traffic!! It did not define the buildings.

p.58 – Units 15-17 – The possible Trusty building was Martyn's despatch department/office. (oral history)

General Comment on Section 3.0, Heritage Interest – The Appraisers suggest that the collection of buildings is not of any great national or local interest. I disagree:

- The diversity and lack of flow of the buildings reflects Martyn's diverse range of production and crafts at Sunningend.
- The buildings are of local interest, because they are so unexpected in Cheltenham, a town which has forgotten its industrial heritage, having promoted itself as a garden town.
- The historically important site deserves a mixed development, retaining at least some links to its past, rather than a bland sea of roofs and garden fences.

Lansdown Industrial
Estate (North)
Cheltenham
Heritage Appraisal

June 2022



Lansdown Industrial Estate (North) Cheltenham Heritage Appraisal

June 2022

Contents

1.0 Introduction	1
2.0 Understanding	2
3.0 Heritage Interest	55
4.0 Bibliography	59

© Built Heritage Consultancy 2022

This report is for the sole use of the person/organisation to whom it is addressed. It may not be used or referred to in whole or in part by anyone else without the express agreement of the Built Heritage Consultancy. The Built Heritage Consultancy does not accept liability for any loss or damage arising from any unauthorised use of this report.

Ordnance Survey mapping in this report is reproduced under licence no. 0100058173

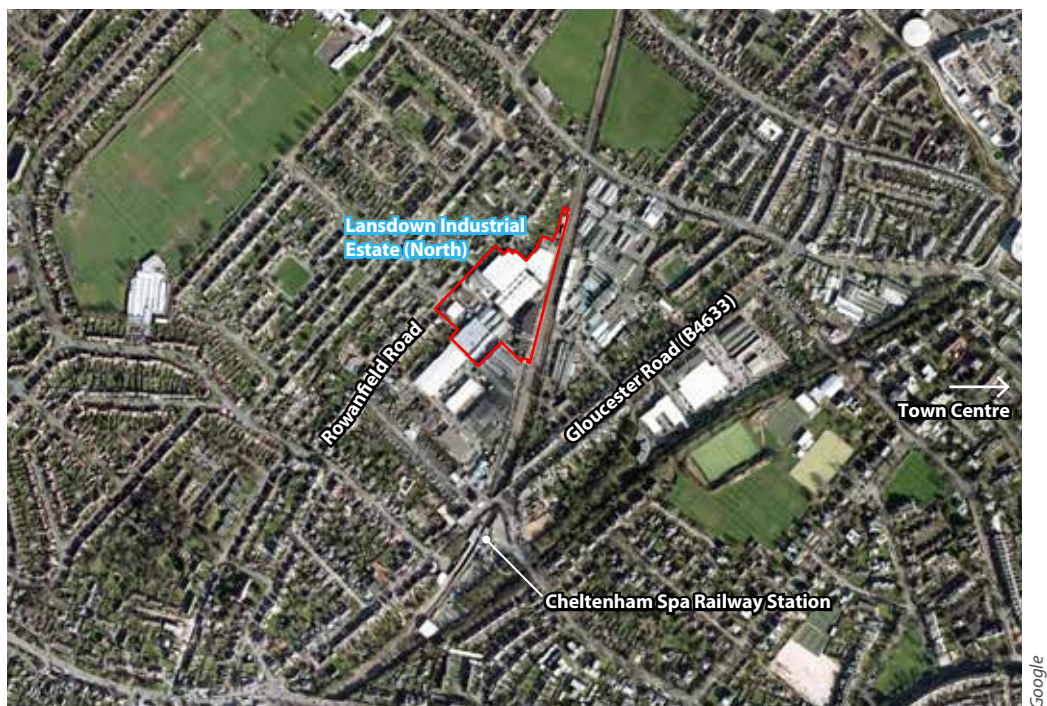
1.0 Introduction

This Heritage Appraisal of the northern half of the Lansdown Industrial Estate (the Site) has been prepared by the Built Heritage Consultancy on behalf of Cheshire West and Chester Council. Although the Site is not within a conservation area and contains no statutorily listed or 'locally indexed' buildings, the Heritage Appraisal has been prepared in response to a request from the planning officer following the submission of an outline planning application for the redevelopment of the Site with up to 215 dwellings and associated works (ref. 21/02832/OUT).

The Lansdown Industrial Estate lies on the western side of Cheltenham, just to the north of Cheltenham Spa railway station. It is bounded to the east by the Bristol to Birmingham railway line, and to the west by Rowanfield Road. The Site appears to have been in industrial use since the late 19th century, starting with the Lansdown Iron Works in 1864 and later becoming the Sunningend Works of H. H. Martyn & Co. Here, between 1908 and 1971, H. H. Martyn & Co. carried on a huge range of skilled engineering and craft trades, including architectural decoration and aircraft manufacture.

The Heritage Appraisal provides an outline of the historical development of the whole Lansdown Industrial Estate, together with discussion of the historical development and heritage interest of all the existing buildings within the boundary of the application Site.

The report has been prepared by Anthony Hoyte BA(Hons) MA(RCA) MSc IHBC and James Weeks MA, and is based on archival research and Site visits made in 2015, 2019 and 2022.



Site location

2.0 Understanding

The application Site comprises only the northern half of the present Lansdown Industrial Estate, but, to make sense of the existing buildings on it, it is necessary first to understand the historical development of the whole Estate. This report makes reference to the numbers by which the various business units of the Industrial Estate are identified (including those beyond the application Site boundary). These are marked on the adjacent aerial photograph.



Bing

Lansdown Industrial Estate: aerial view from the east with the Unit numbers marked (* Unit 12 was demolished in 2018)

2.1 Pre-development

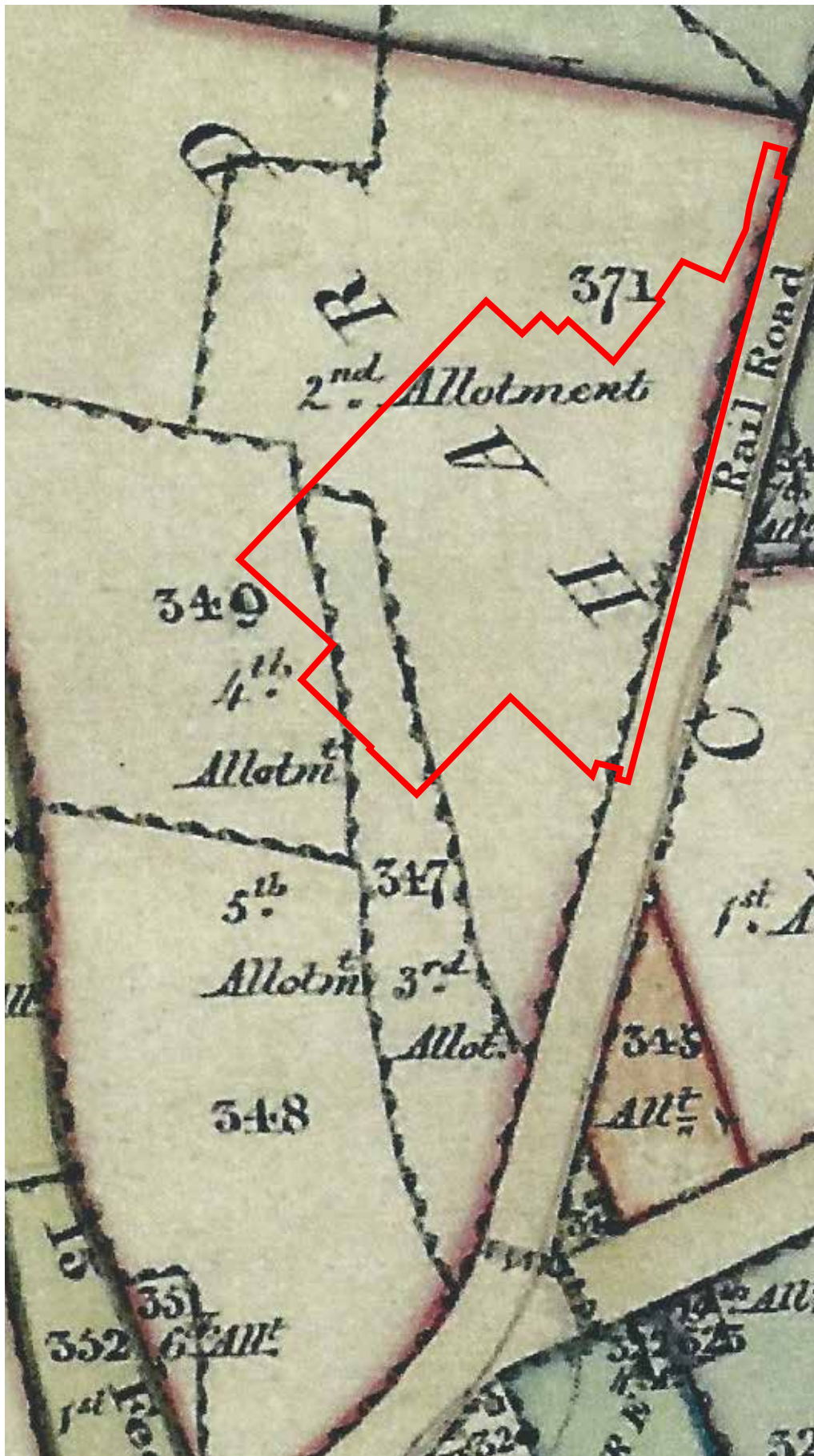
The area of the Site appears to have remained undeveloped until the late 19th century. The Alstone and Arle Inclosure map of 1835 shows it to have then comprised fields in the ownership of a Richard Roy Esq. Roy was a solicitor and property developer, who worked alongside the better known Pearson Thompson (1794-1872), who developed Cheltenham's Montpellier and Lansdown Estates, and who was described at the time of his death as the 'Maker of Cheltenham'. Roy and Thompson were both founder-directors of a local joint-stock bank, and together they went on to develop the western side of the Ladbrooke Estate in Notting Hill, London. The Ladbrooke Estate's Lansdowne Crescent, Gardens, Mews, Rise, Road and Walk all owe their name to the Lansdown Estate in Cheltenham.

The 1835 Inclosure map shows that the northern half site of the present Lansdown Industrial Estate then comprised parts of three of Roy's fields, known as Hazard's Field (plot 371), the Langett (347) and Free[?] Piece (349).

The 1835 Inclosure map shows the presence of a 'Rail Road' following the course of the present-day Bristol to Birmingham main line, which bounds the eastern side of the Site. This was the Birmingham & Gloucester Railway (B&GR), which wasn't actually authorised until 1836 and didn't open until 1840, but which was clearly then at the planning stage. What is now Cheltenham's principal railway station, a little to the south of the Site, was opened by the B&GR on 24 June 1840; it was originally named 'Lansdown', but was renamed 'Cheltenham Spa (Lansdown)' in 1925 and 'Cheltenham Spa' some time after 1948.

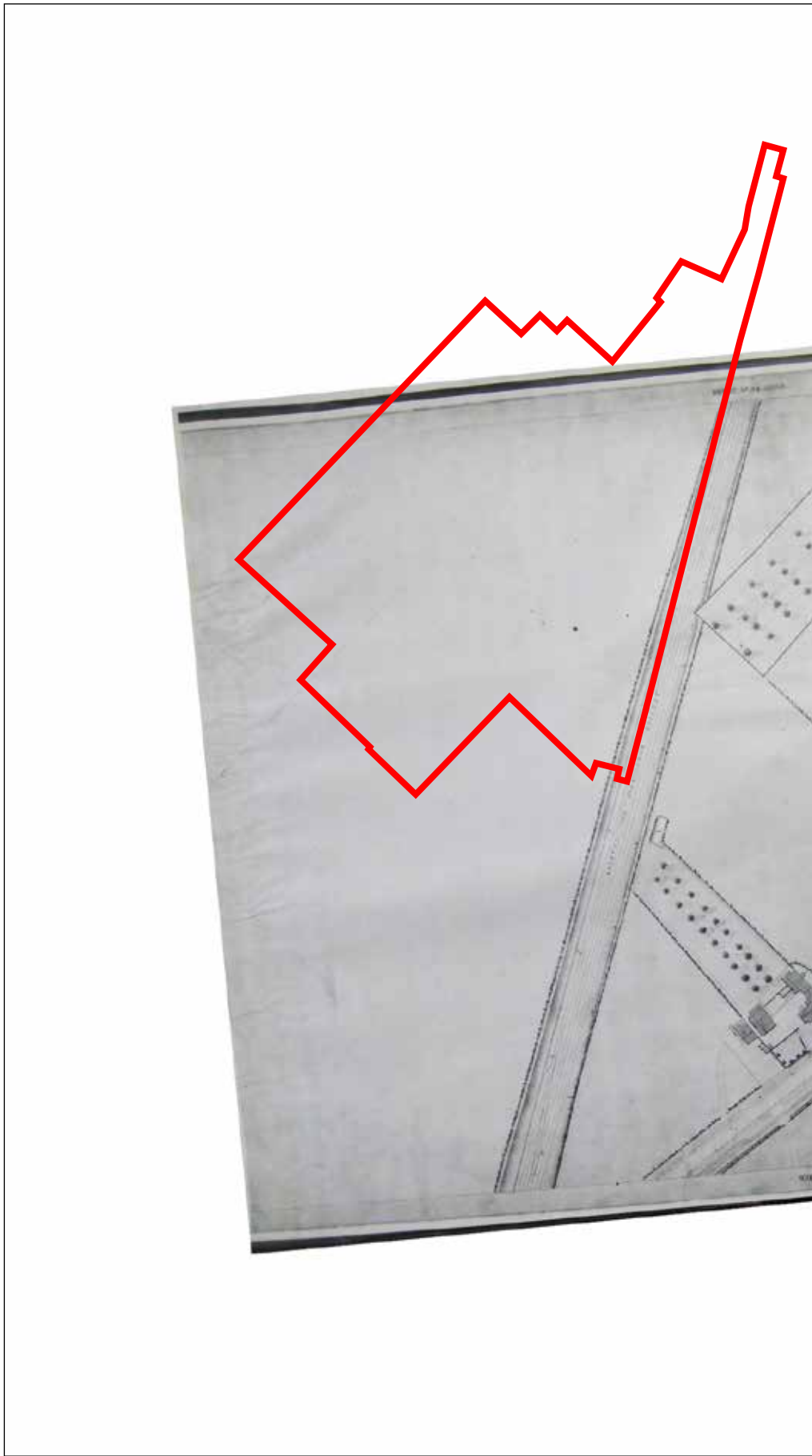
The railway line is shown on the 'Old Town Survey' of 1855-7, but the application Site itself was still undeveloped at this time. Rowanfield Road (and the streets further north west) had yet to appear, although there was a detached villa named 'Rowenfield House' present on Gloucester Road a little to the south (demolished between 1967 and 1999).

According to the Cheltonia website (<https://cheltonia.wordpress.com/>), Rowanfield Road was described as 'newly-formed' in 1869 and was referred to simply as 'the road between the Libertus estate and Westfield', getting its present name around 1872. The Libertus Estate – centred on the present-day Libertus Road to the south west of the Industrial Estate – was a residential development built in c.1850 by the Cheltenham & Gloucester Freehold Land Society. 'Westfield' is the detached villa at the corner of Rowanfield Road and Alstone Lane (now no. 66 Alstone Lane).



Alstone and Arle Inclosure Map, 1835

Gloucestershire Archives



Gloucestershire Archives

Cheltenham 'Old Town Survey', 1855-7

2.2 The Lansdown and Vulcan Iron Works

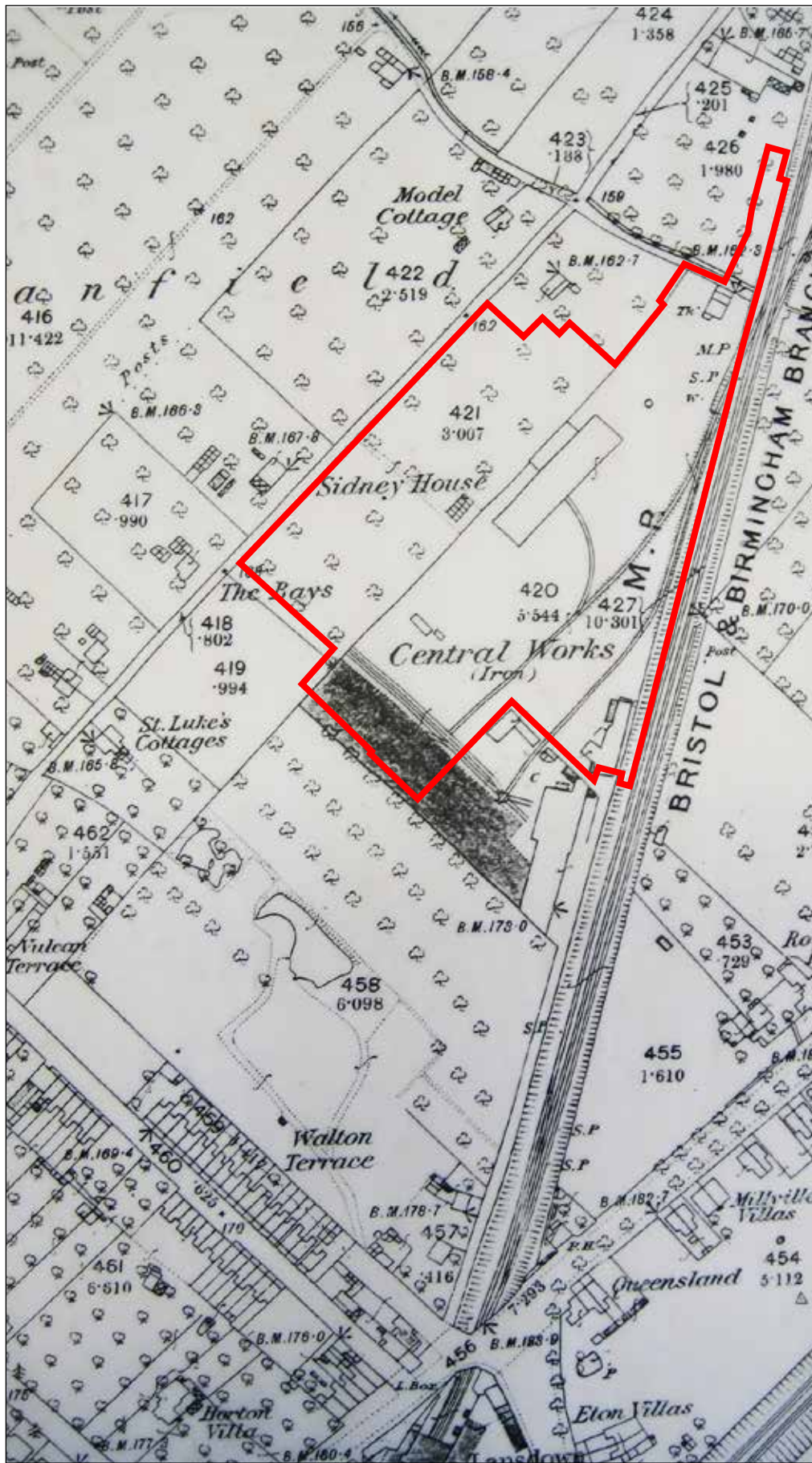
Green (1999) records that, in 1864, a John Cormell set up the Lansdown Iron Works near to the Lansdown Station. Cormell's works were managed by William Letheren (d. 1910), who was described in 1866 as 'the greatest art ironworker in England'. In 1872, according to Rowbotham & Waller (2004:109), Letheren set up his own business – the Vulcan Iron Works – next to Cormell's premises, to manufacture 'improved lifts and cranes, iron roofs, girders, gates, railings ... mediaeval and artistic work in iron and brass'.

The fate of John Cormell is not known, but by 1875 his ironworks had been taken over by Messrs. Vernon & Ewens, who produced the ironwork for the Winter Gardens in Imperial Square, as well as Hammersmith suspension bridge and numerous Great Western Railway (GWR) stations.

The 1:500 Ordnance Survey (OS) map of 1885 (surveyed in 1884) and the 1:2,500 OS map of 1887 (surveyed in 1883) both show the present Site to have then accommodated part of the 'Central Works (Iron)'. This was Cormell's and then Vernon & Ewens' Lansdown Iron Works, although later evidence (a sales plan of 1907, discussed below) confirms that a long range on the eastern side of the Site adjacent to the railway – subsequently much altered to become Unit 12 (demolished in 2018) – was Letheren's Vulcan Iron Works.

The 1885 and 1887 OS maps show the Site to have been connected directly to the railway, with tracks into several of the buildings. The principal structures were: a SW-NE aligned rectangular block on the site of the present Unit 8; a range adjacent to the railway along the south-eastern side of the site of the present Stagecoach bus depot; a range marking the then south-western boundary of the works, extending along the south-western side of the bus depot site and over the southern end of the site of the present Unit 1; and an L-shaped building at the northern corner of the bus depot site. As noted above, Letheren's Vulcan Works (Unit 12, demolished in 2018) was on the eastern side of the Site next to the railway. Two small cottages stood at the northern end of the Site.

Vernon & Ewens folded in 1890 and the Central Iron Works site was used briefly by Meats, Peake & Co. as their Central Engineering Works for agricultural machinery repairs, before the firm's removal to Montpelier.



Gloucestershire Archives

Ordnance Survey, 1887 (surveyed in 1883)

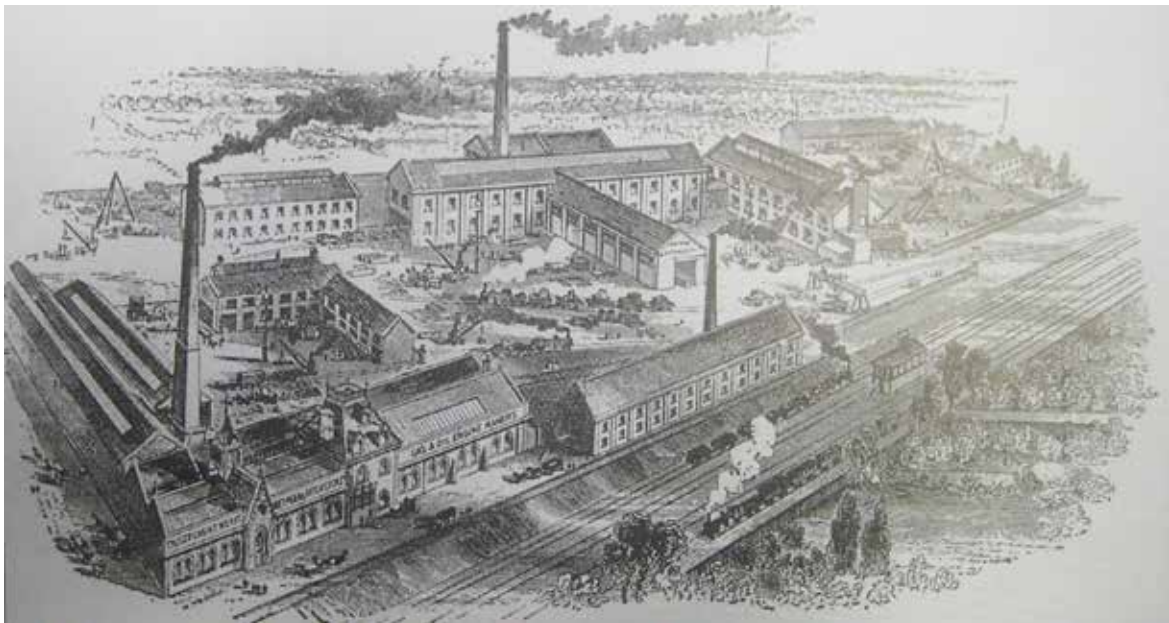
2.3 The Trusty Engine Works

In c.1895, the Central Ironworks site was acquired by Weyman & Hitchcock, a Guildford-based manufacturer of oil and gas engines, including the 'Trusty' oil engine. Production of the engines was moved to Cheltenham, and, in 1899, a new company was registered as the Trusty Engine Works, to acquire the business of Weyman & Hitchcock. An engraving of the Trusty Engine Works of c.1899 (and the 1:2,500 OS map of 1903, revised in 1901) suggest that most of the Central Iron Works buildings were retained and extended. The rectangular block on the site of the present Unit 8 had been extended to the south east with two further ranges, and to the north west with a boiler house with a tall chimney. A completely new building had been erected at the northern corner of the site of the present Unit 1.

The engraving of c.1899 shows Letheren's Vulcan Works on the eastern side of the Site to have comprised a long range of twelve bays arranged over two storeys and with a simple pitched roof, with a tall chimney close to its northern end. This building subsequently underwent much alteration before becoming Unit 12; it was demolished in 2018.

In 1907, the Trusty Works was put up for sale. By this time, the area now occupied by the Stagecoach bus depot had already been disposed of, and had become a tram depot; the range adjacent to the railway had been demolished, but part of the range extending north-westwards from it was retained and became the tram shed. The remaining parts of the Trusty Works site were divided into four lots, as shown on the plan accompanying the sales particulars.

Lot 1 comprised an area of 1 acre, 3 roods, 26 perches, and included the buildings on the site of the present Unit 8, comprising: machine shop; general offices; smith's shop and boiler & engine house; pattern makers' shop; general store; brass foundry and moulding shop; and iron foundry.



Rowbotham & Waller (2004: 11)

c.1899 engraving of the Trusty Engine Works from the south east; the long 12-bay range adjacent to the railway line was William Letheren's Vulcan Iron Works, which survived until 2018 as Unit 12

Page 108

Lot 2 comprised an area of 2 roods, 38 perches, and included the building at the northern corner of the site of Unit 1, identified as an engine-testing house. The sales particulars noted that:

This Lot would be highly suitable for Jam Factory, and as Cheltenham is the centre of a fruit growing district there is every need for such an industry in the locality.

Lot 3 comprised an area of 3 roods, 38 perches, and included a small building to the south east comprising brick-built offices or workshops. This building, erected between 1883 and c.1899, might conceivably survive as the present pitched-roofed element towards the northern end of the range of Units 15-17 – making it the oldest surviving building on the Site – although it has clearly been much altered.

Lot 4 comprised an area of 22 perches, and included the two cottages at the northern end of the site.

The sales particulars noted that the Trusty Works comprised:

a Total Area of about four acres, with sidings from the Midland Railway, and with very complete substantially built, well-lighted and ventilated brick buildings suitable for almost any manufacturing business, but especially for an Automobile Factory.



Ordnance Survey, 1903 (revised in 1901)

Gloucestershire Archives



Gloucestershire Archives

Trusty Works Sales Particulars, 1907

2.4 The Sunningend Works of H. H. Martyn & Co.

In the event, the whole Trusty Works site was purchased by H. H. Martyn & Co. and renamed the Sunningend Works, opening in July 1908. Letheren's Vulcan Works did not form part of the sale, but were at some point acquired by H. H. Martyn & Co.

H. H. Martyn & Co had begun in February 1888 as an association of Art Craftsmen founded by Herbert Henry Martyn (1842-1936) a stone, marble and wood carver who specialised in gravestones, memorials and ecclesiastical decoration. Martyn had come to Cheltenham in c.1866 to work for R. L. Boulton & Sons, and in 1874 he and another Boulton's stone carver, E. A. Emms, had established a partnership as monumental masons. An early example of Martyn's own carving work is the canopied stone reredos at the Church of St Philip and St James, Leckhampton (1889). In 1898, after ten years on his own, H. H. Martyn took two partners into the business, his son Alfred William Martyn (1870-1947) and Henry Arthur Dutton, all three being described at that time as sculptors. In 1900, the partnership of H. H. and A. W. Martyn and H. A. Dutton was reformed and incorporated as a limited company with premises at Holly Cottage (later named 'Sunningend'), Stirling Cottage and Stirling Lodge, all at the eastern end of the High Street.

Following its acquisition of the Sunningend Works in 1908, H. H. Martyn & Co. continued to concentrate on monumental masonry, but soon established a name for itself in the allied areas of woodwork, panelling, sculpture, fibrous plasterwork, stained glass, marble carving, bronze casting and ironwork.

In 1908, the firm was commissioned by the Government's Office of Works to make the Cumberland Screen to stand at the northern end of East Carriage Drive, Marble Arch, London. With such a substantial order in hand, Charles William Hancock, who had previously worked at the Vulcan Iron Works and subsequently produced ironwork for Martyn's on a sub-contract basis, was brought in to open and manage a full-time art ironwork department. According to Whitaker (1998:97), production of the gates, screen and lanterns took almost 80 men over three months. (The Cumberland Screen is no longer in situ having been removed for traffic 'improvements'; one set of gates reportedly now stands at the entrance to a park in Saskatchewan, Canada.)

Martyn's prestigious architectural projects in the pre-war period included decorative work for: the Shire Hall, Reading (1904-11); the Methodist Central Hall, Westminster (1905-11); the Adelphi Hotel, Liverpool (1911-14); Middlesex Guildhall (1912-13); and the Third Church of Christ Scientist, Liverpool (1914); as well as the renewal of historic plasterwork at Sledmore House, Yorkshire (1913). It was also at this time that H. H. Martyn & Co. began to establish an international reputation for making complete decorative interiors for ocean liners, beginning with the Orient Line's Orvieto (1909).

WW1 and the switch to aircraft production

During the First World War, demand for artistic and decorative work almost ceased. Martyn's was severely hit but in 1914 the firm won a contract from the War Office to manufacture ammunition boxes. Of far greater importance to the company's survival, however, was its switch to aircraft manufacture. In 1915, the firm was approached by Hugh Burroughes of the Aircraft Manufacturing Company (Airco) of Hendon. With the outbreak of war, Airco needed to subcontract some of its production, and, as aircraft at this time were made predominantly

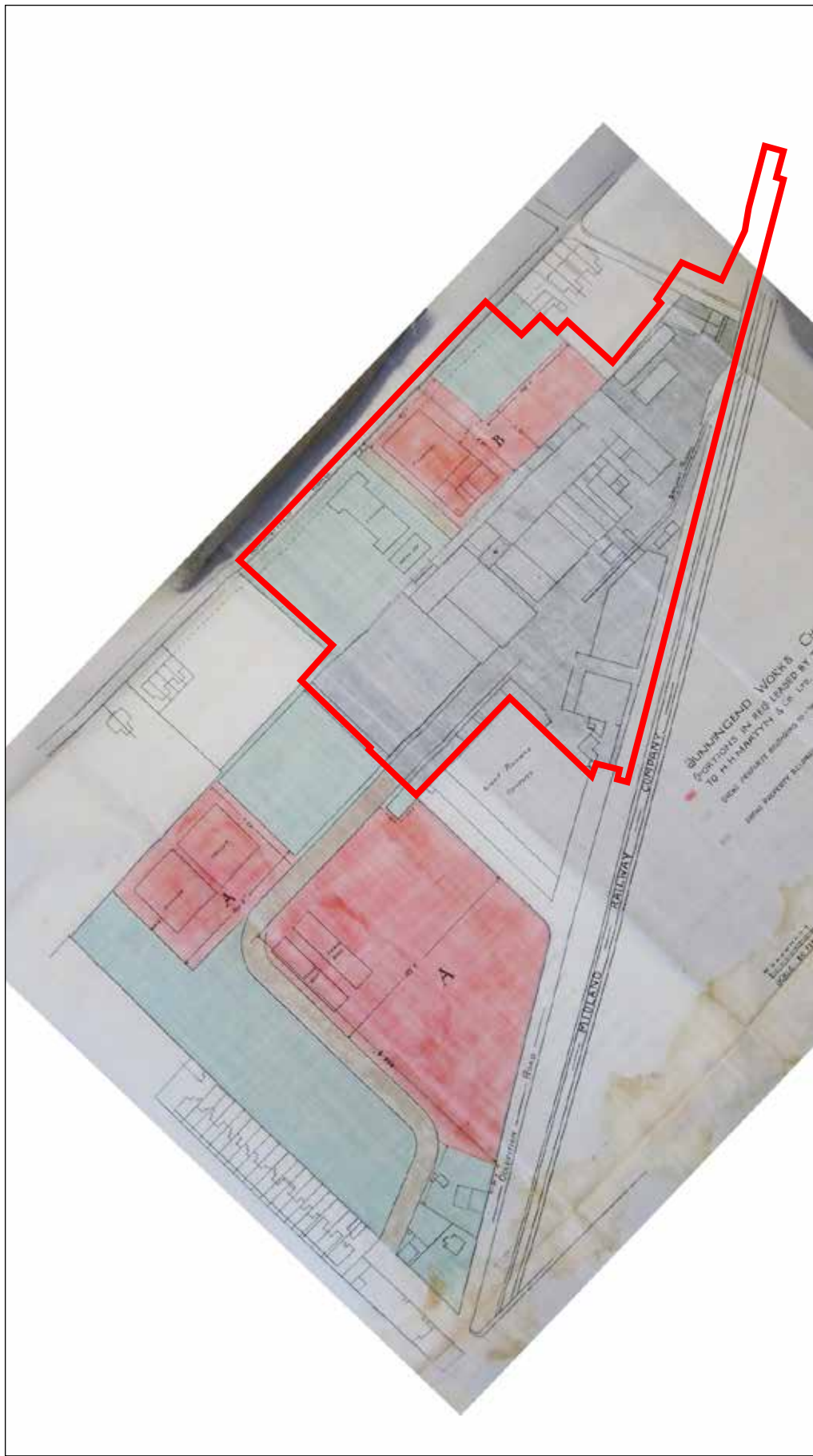
of wood, H. H. Martyn & Co. was recommended. Martyn's first aircraft contracts were for spares and components for the MF.7 Longhorn and MF.11 Shorthorn, the Airco DH.2 (designed by Geoffrey de Havilland) and the B.E.2c.

In 1917, the boards of H. H. Martyn and Airco formed the Gloucestershire Aircraft Company (from 1926 the 'Gloster' Aircraft Company or GAC) to take over Airco's sub-contract work. Orders continued to flow in; for DH.6 and DH.9 fuselages, then for complete Bristol F.2Bs and F.E.2bs and Nieuport Nighthawks. The company was apparently producing 45 aircraft per week by 1918, and, according to James (1971:4), the Sunningend Works was the most reliable source of DH.4 and DH.6 fuselages, and Bristol and Nieuport fighters during the latter half of the war. The ever-increasing quantities of airframes required for the war effort meant that additional space was required, and from 1916 until the end of the war, work was also carried out in the Winter Gardens in Imperial Square.

With the end of the war came the cessation of military contracts. Limited production of the Bristol F.2b and Nieuport Nighthawk continued for a time, but there was no design team to strike out on the creation of new types of aircraft. During the period 1918-1920, Martyn's main concern was how best to utilise the manufacturing resources of the Sunningend Works until such time as its traditional work of architectural decoration and ship interiors could resume. A number of contracts were obtained from Rover, Siddeley-Deasy and Wolseley for car components, and (reflecting the Trusty Works sales particulars of 1907) Wolseley cars were assembled at Sunningend in 1922/3. In addition, the firm designed and manufactured an innovative motor scooter named the Unibus (c.1920). However, this was ahead of its time and very expensive, and the project was abandoned with less than a hundred built.

Meanwhile, the company was determined to remain a part of the aircraft industry, despite the paucity of orders. In 1920, the Nieuport factory was wound up and the company acquired the design rights of the Nieuport Nighthawk fighter. Nieuport's chief designer, H. P. Folland, agreed to oversee the further development of the Nighthawk, later joining GAC as chief engineer and designer. The result was the Mars I, or Bamel, single-seat biplane racer, which went on to win the 1921 Aerial Derby and set a new British speed record. Further refinement of the Bamel enabled it to win the Aerial Derby again in 1922 and 1923. Folland designed numerous variants of the Mars, but only the Mars VI Nighthawk and the Mars X Nightjar went into production, and then only in small numbers. Folland's next innovation was the 'High Lift Biplane' (HLB), a combination of different aerofoil sections which produced in a biplane something approaching the wing efficiency of a monoplane, but with greater manoeuvrability. In 1923, the Air Ministry ordered three prototypes embodying the HLB wing combination, and thus was born the Grebe, the RAF's first post-WW1 fighter aircraft. Whilst its design was being refined, the Sunningend Works concentrated on building and reconditioning Panthers, DH.9as and Nightjars. From the Grebe was developed the Gamecock. Although 90 were built at Sunningend, the Gamecock's all wooden construction was a contributory factor to the company's long sojourn in the 'aviation wilderness' which began in the late 1920s.

GAC had made limited use of **Hucclecote Aerodrome** since it first became involved in aircraft manufacture, taking aircraft there from Sunningend by road for flight testing. By 1927, however, it had become clear that, because of the trend towards metal construction, the factory requirements of GAC were now very different from those of H. H. Martyn & Co. In 1928, arrangements were made to buy the entire 200 acre **Hucclecote site**, and by the end of 1929, **GAC's design and manufacturing facilities had been relocated there.**



Gloucestershire Archives

Site ownership plan, 1921; the grey areas belonged to H. H. Martyn & Co., and the green areas to the Gloucestershire Aircraft Company (GAC); the red areas were leased by GAC back to H. H. Martyn & Co., presumably following the cessation of military contracts at the end of WW1

Page 115

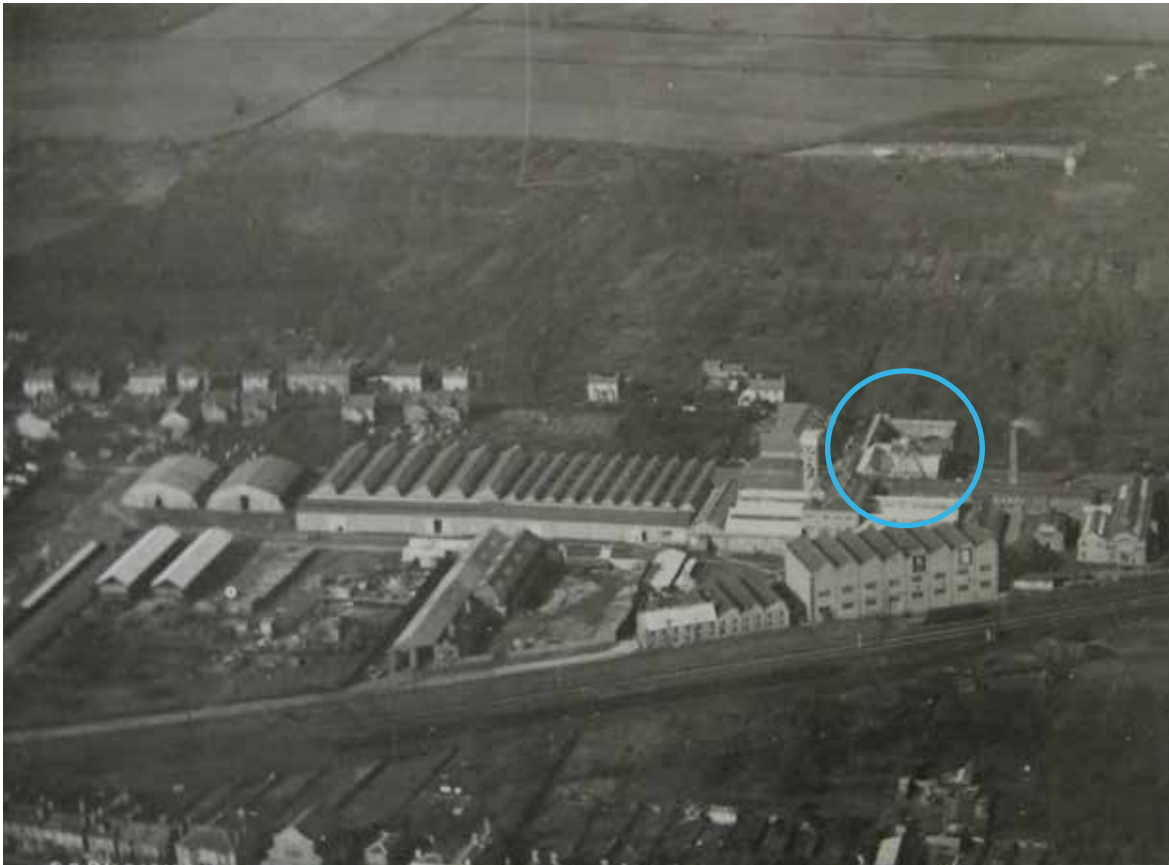
Martyn's diversification into aircraft manufacture had brought great changes to the Sunningend site. Between 1907 and 1921, several new buildings were erected.

The former Trusty engine-testing house of 1883-c.1899, which stood at the northern corner of the present Unit 1, was extended to the south east with a NW-SE aligned pitched-roofed element and two SW-NE aligned bays with bowstring truss roofs. Aerial photographs of the 1920s and '30s suggest that the south-eastern elevation of the latter volumes had large doors or shutters which allowed the whole side of the building to be opened up. What appears to have been a water tower stood immediately to the north. Extending south-westwards from this collection of buildings there was, first, a long shed with a 10-bay northlight roof (the south-western end of the present Unit 1), and then (over the site of the present Units 37-42) a further shed with a 6-bay northlight roof. A further pitched-roofed range ran along the south-eastern side of these two sheds, the northern end of which survives as Unit 1A. Aerial photographs of the 1920s and '30s show that the south-eastern side of the latter range was mostly solid, punctured only by a few large doorways, and that until at least 1928 the roof of its northern end was painted with the word 'AERODROME' (although there is nothing to suggest that there was ever a runway on the Site). Together, these buildings accommodated the erecting shop, dope shop ('dope' was a spirit-based varnish used to stretch and seal the aircrafts' canvas outer skin), pressing shop, and tail-plane shop.

The Trusty buildings on the site of the present Unit 8 remained in place but were greatly extended, the space between the present Units 1 and 8 being infilled with a brick-built range over three storeys and flanked to the north east by two further bowstring truss roofs mirroring those to the south west, together with several more brick buildings. Together these accommodated various offices, stores, plant and dumps.

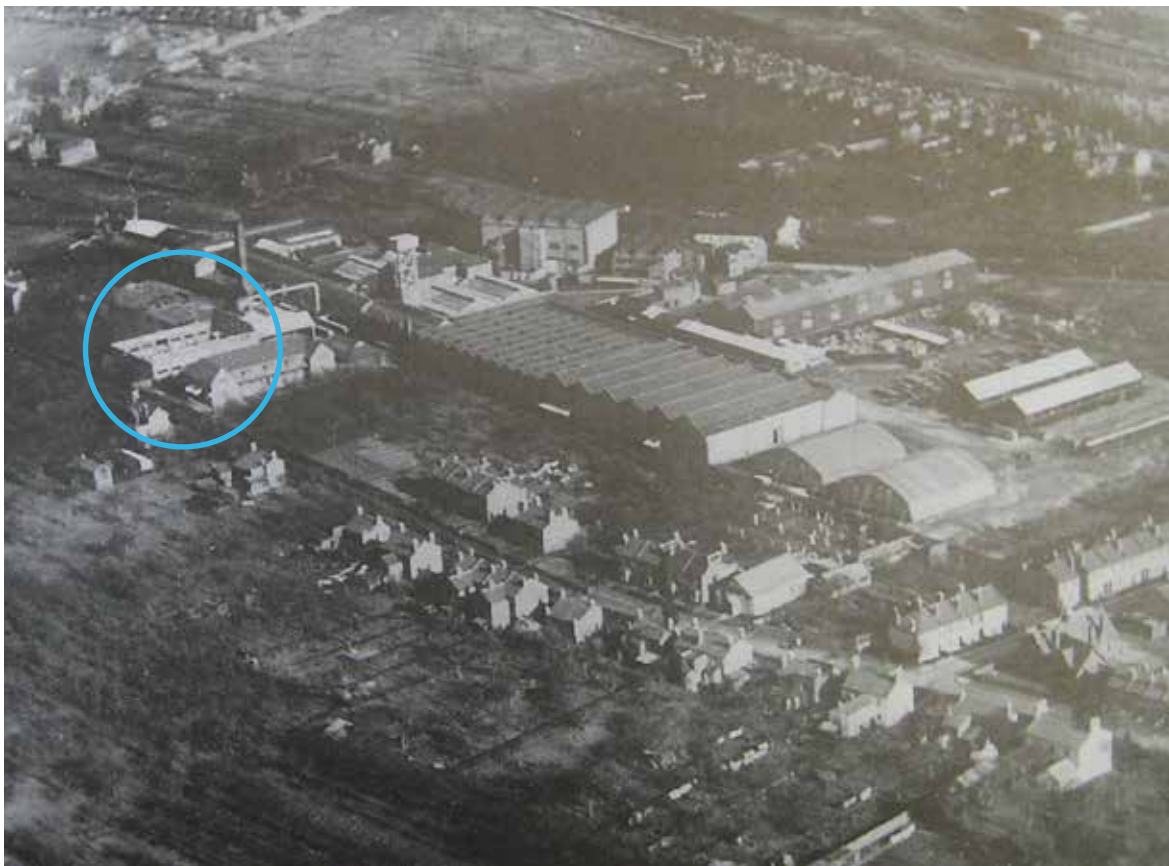
The same period also saw the construction of the present Unit 3 (the canteen), Unit 4 (toilet block) and Unit 5 (foundry). Aerial photographs show the foundry under construction in the early 1920s and completed by 1925. The present Unit 11 was also erected, and the former Vulcan Iron Works building (Unit 12, demolished in 2018) was much remodelled and extended, although the role of these two buildings during this period is not known. It is not known who designed any of the new buildings.

To the south west, beyond the present Site boundary, were two detached hangers (present in 1921 but gone by 1925), which stood on the south-western end of the site of the present Units 37-42 and on the adjacent land, now the car park to Unit 22 (Maxet House).



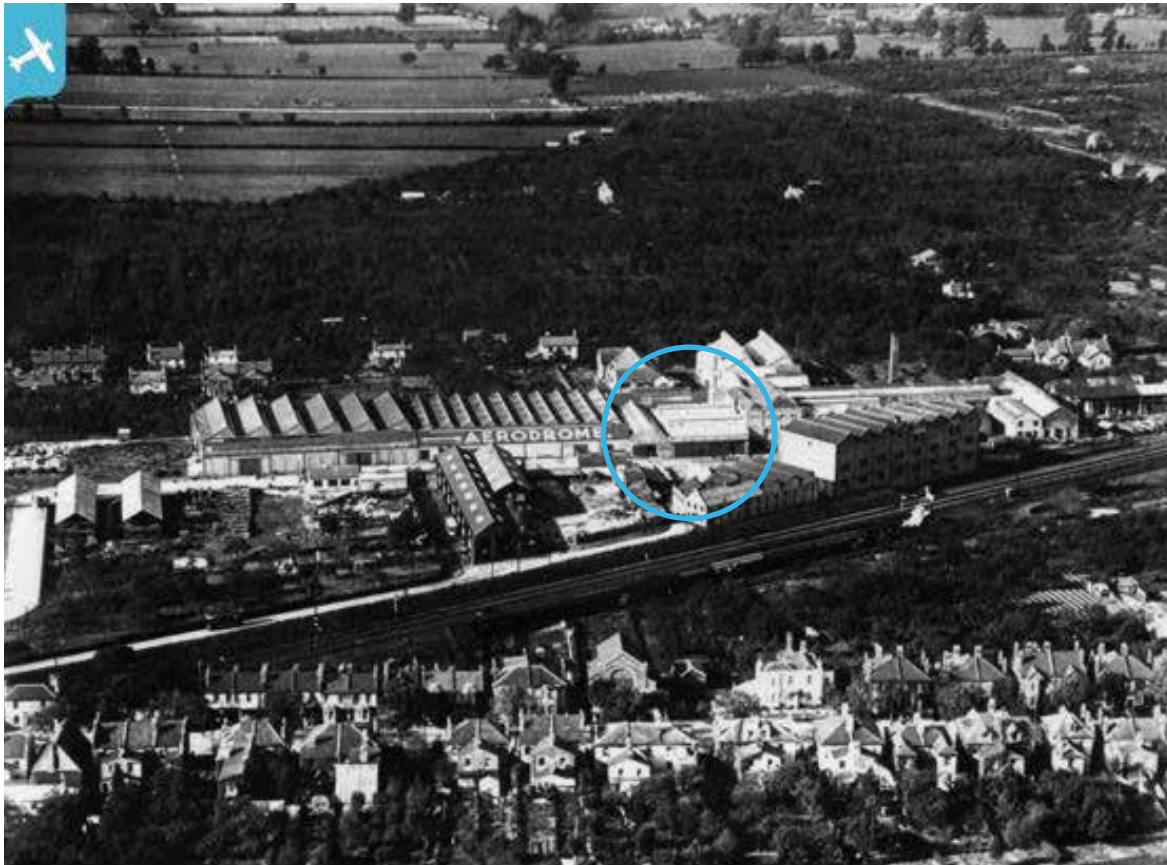
Gloucestershire Archives

Aerial view from the south east, dated to c.1920 by Gloucestershire Archives; the two hangers at the centre left of the photograph were present in 1921 but had gone by 1925; the foundry building (Unit 5, circled) is under construction



Rowbotham & Waller (2004:113)

Aerial view from the west, 1920s; the two hangers at the centre right of the photograph were present in 1921 but had gone by 1925; the foundry building (Unit 5, circled) is under construction



www.britainfromabove.org.uk

Aerial view from the south east, 1925; note that the south-eastern elevation of what is now part of Unit 1 (circled) appears open, suggesting that the apparently solid elevation visible in the earlier photograph above was actually large doors or shutters; the elevation is now infilled with brick; note the word 'AERODROME' on the roof of the range along the south-eastern side of the present Unit 1



www.britainfromabove.org.uk

Aerial view from the south east, 1928



www.britainfromabove.org.uk

Aerial view from the north east, 1931



www.britainfromabove.org.uk

Aerial view from the south east, 1931

The inter-war period

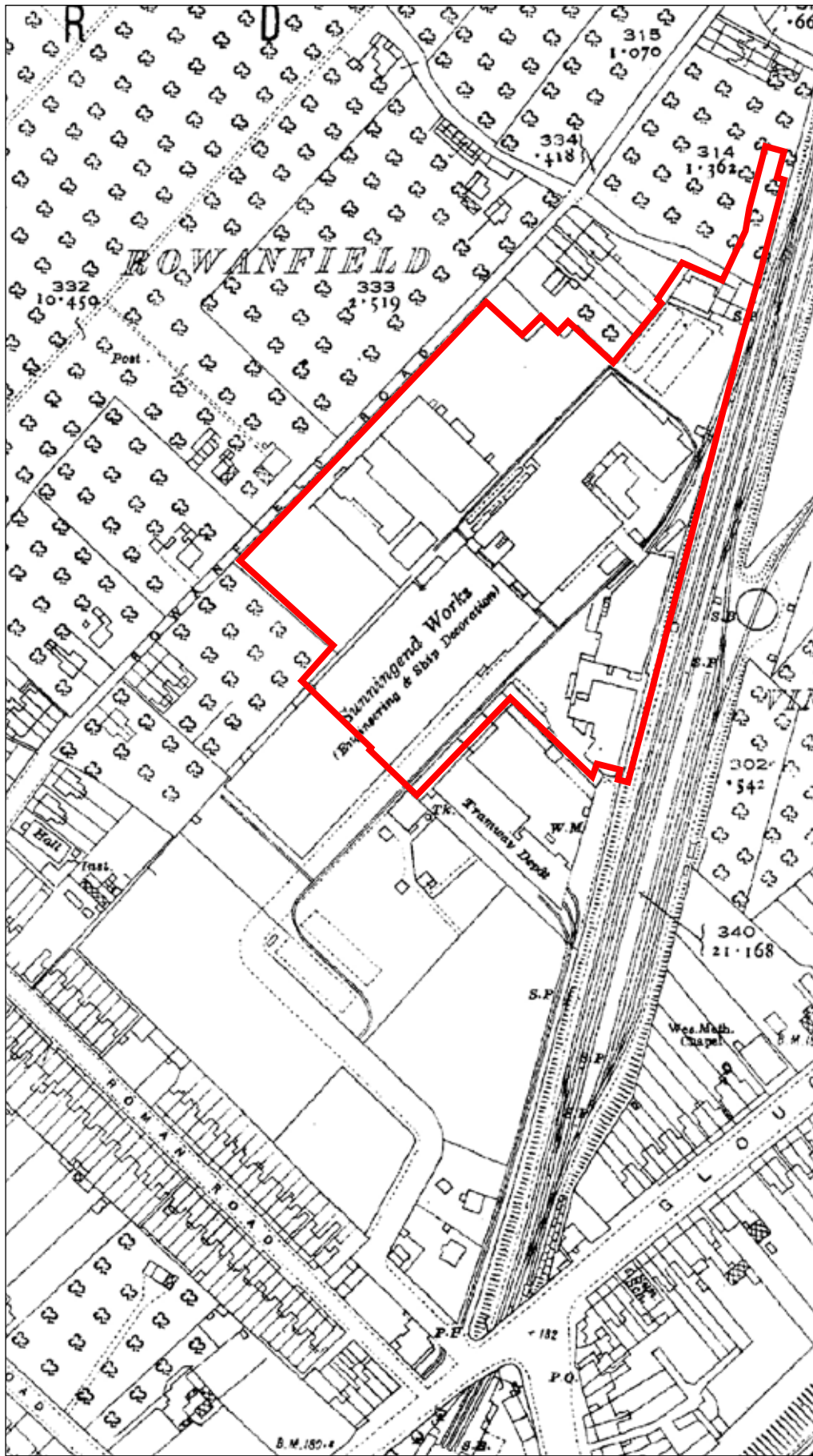
As GAC relocated to **Hucclecote**, so H. H. Martyn & Co. once again occupied the greater part of the Site, although some aircraft components were still manufactured here. A fire insurance plan of 1936 shows that the (since demolished) building on the site of the present Units 37-41, beyond the present Site boundary, was used for the assembly of aircraft wings. Elsewhere, however, the plan shows the resumption of 'normal service': the present Unit 11 (and the adjacent Unit 12, demolished in 2018) were used for plaster working and cabinet making; the buildings that then occupied the site of the present Unit 8 were given over to a sawmill and joiners' shops; the present Unit 3 was the canteen; and the present Unit 5 was the foundry. By this time, a general metal-working shop had been added to the north-eastern side of the foundry, on the site of the present Unit 6.

During the interwar period, Martyn's core activity was the production of architectural decoration for civic, ecclesiastical and commercial buildings, and furniture and fittings for ocean liners, and the 1:2,500 OS maps for both 1923 (revised in 1920-21) and 1932 indicate that that the Works was engaged in 'engineering and ship decoration'. **Prestigious architectural projects at this time included** decorative work and furniture for: the Lal Bagh Palace, Indore, India (c.1921); Bush House, London (1923-35); the headquarters of the Midland Bank, London (1924-39); the Park Lane Hotel, London (1927); the Freemasons' Hall, London (1927-33); Unilever House, London (1929-33); Barnsley Town Hall (1932-3); the headquarters of Martin's Bank, Liverpool (1932); Cambridge University Library (1931-4); many cinemas, including the Regal, Cheltenham (1939); and standard lamps for the Queensway Tunnel under the Mersey (1934). The firm's extensive portfolio also included complete interiors for a great number of world-class ocean liners, amongst them the Orion (1934), the Queen Mary (1934) and the Queen Elizabeth (1938).

In 1934, H. H. Martyn & Co. was taken over by the London-based furniture manufacturer, Maple & Co., **which saw the opportunity to establish a major foothold in the in the ocean-liner fit-out business.** (Most of the **records of H. H. Martyn were apparently destroyed at the instigation of Maple's management when it sold off the firm in 1971.**)

The present Unit 2 was erected between 1936 and 1940 as a surface shelter. The same period also saw the construction of **Unit 7, subsequently much altered and over-clad, identified as a woodworking mill.** To south west, beyond the present Site boundary, the industrial shed with a 6-bay northlight roof on the site of the present Units 37-42 was extended to the south west with a further three bays.

As early as 1921, there had been a covered way between the present Unit 11 and the buildings on the site of the present Unit 8. Between 1936 and 1940, this was added to with **a single-storey extension at the north-western corner of Unit 11.**



Ordnance Survey, 1932

www.old-maps.co.uk

WW2

With the outbreak of the Second World War, the production of aircraft components was resumed at Sunningend through an associated company, H. H. Martyn (Aircraft) Ltd. The firm is known to have been involved in the manufacture of tail units for the De Havilland DH.98 Mosquito, wings for the Armstrong Whitworth A.W.41 Albemarle, wings and rudder fins for the Miles M.14 Magister and M.9 Master training aircraft, bomb racks for the Vickers Wellington bomber, and cockpits for the Airspeed AS.51 Horsa glider. A plan of 1940 suggests that virtually the whole Site was given over to the war effort.

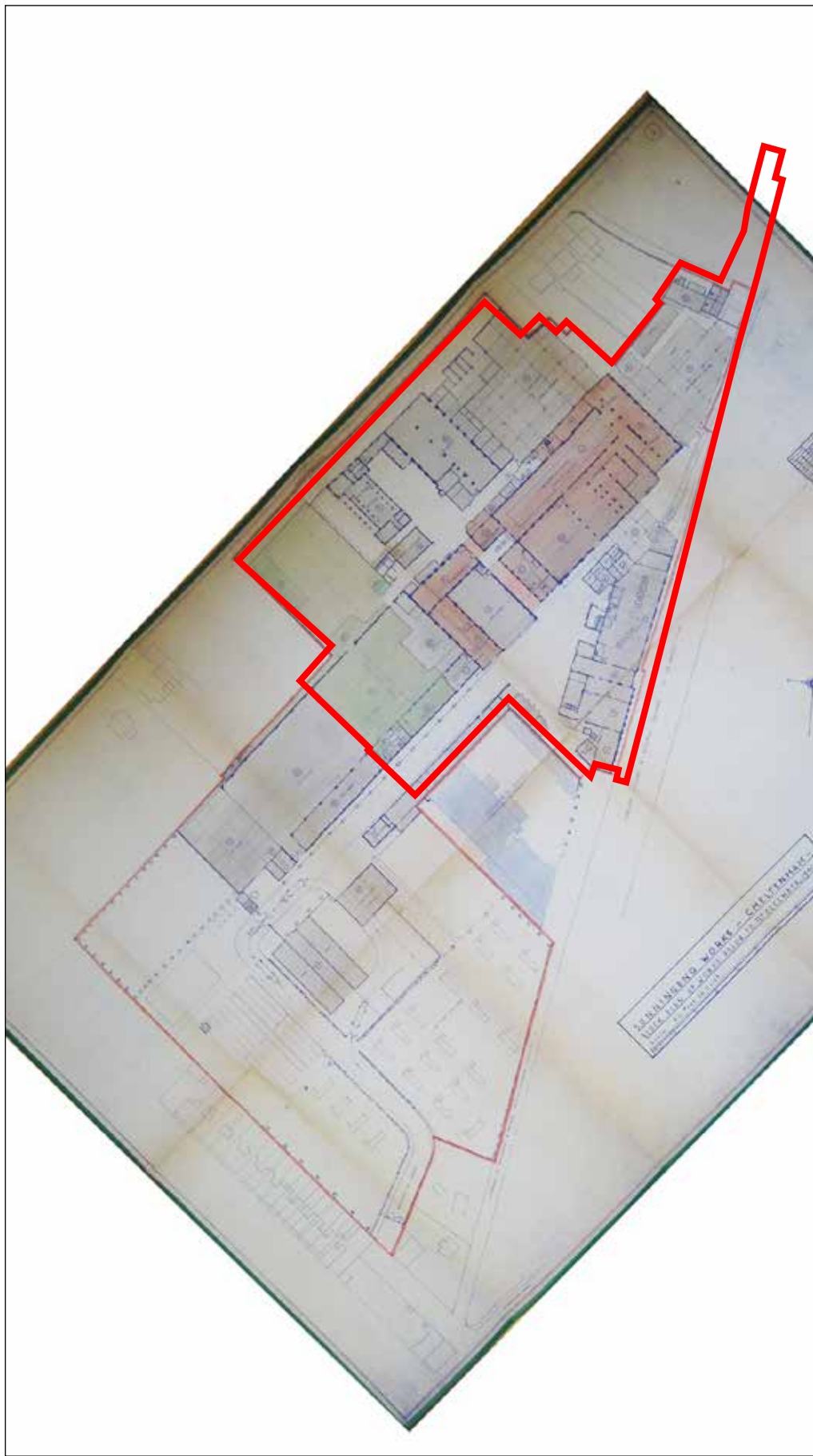
On 11 December 1940, Cheltenham experienced its worst night of bombing during WW2. Several buildings at Sunningend were destroyed, including the whole of the Lansdown Iron Works/Trusty Works building on the site of the present Unit 8 (identified as Lot 1 in 1907), and the former Trusty engine-testing house at the northern corner of the present Unit 1 (identified as Lot 2 in 1907).

Proposals were quickly brought forward for rebuilding on these sites, as well as for a new office building at the south-western end of the Works (beyond the present Site boundary). Drawings were prepared in 1941-2. All the new buildings were designed by Gordon & Fitch Architects of Jermyn Street, London, in association with H. Johnstone. Very little is known about Gordon & Fitch, save that they designed alterations to numerous shops, restaurants and public houses in Westminster and the City of London in the 1940s, '50s and '60s. H. Johnstone was perhaps a local executive architect.

The buildings making up the Lansdown Iron Works/Trusty Works building identified as Lot 1 in 1907 were completely destroyed, and the 1940s works resulted in the erection of the present Unit 8. This building retains its original roof form comprising a taller central section with clerestory windows, and with six northlights in the section of roof to the north west. The new building was connected to the range to the south west (now Unit 1) by a covered way, and the two were identified together on 1940s drawings as the tail plane shop. The new building was also connected by a covered way to the existing building to the north east (much altered and now Unit 7), which was identified as a woodworking mill, and which had been erected between 1936 and 1940. And, a new covered way was added between Unit 8 and the single-storey extension at the north-western corner of Unit 11.

The former Trusty engine-testing house at the northern corner of the present Unit 1 had been erected between 1883 and c.1899. By 1921, it had been extended with a NW-SE aligned pitched-roofed element extending to the south east from its southern end. In the area between the two had been erected two further SW-NE aligned sheds with bowstring truss roofs. Extending south-westwards from this collection of buildings was a long shed with a northlight roof. The 1940s works here involved rebuilding the north-western and north-eastern external walls and the roof of the former engine-testing house, and extending the bowstring truss roofs south-westwards over the space previously occupied by the pitched-roofed south-eastern projection.

A new office building – Maxet House (Unit 22) – was erected to the south west (beyond the present Site boundary).



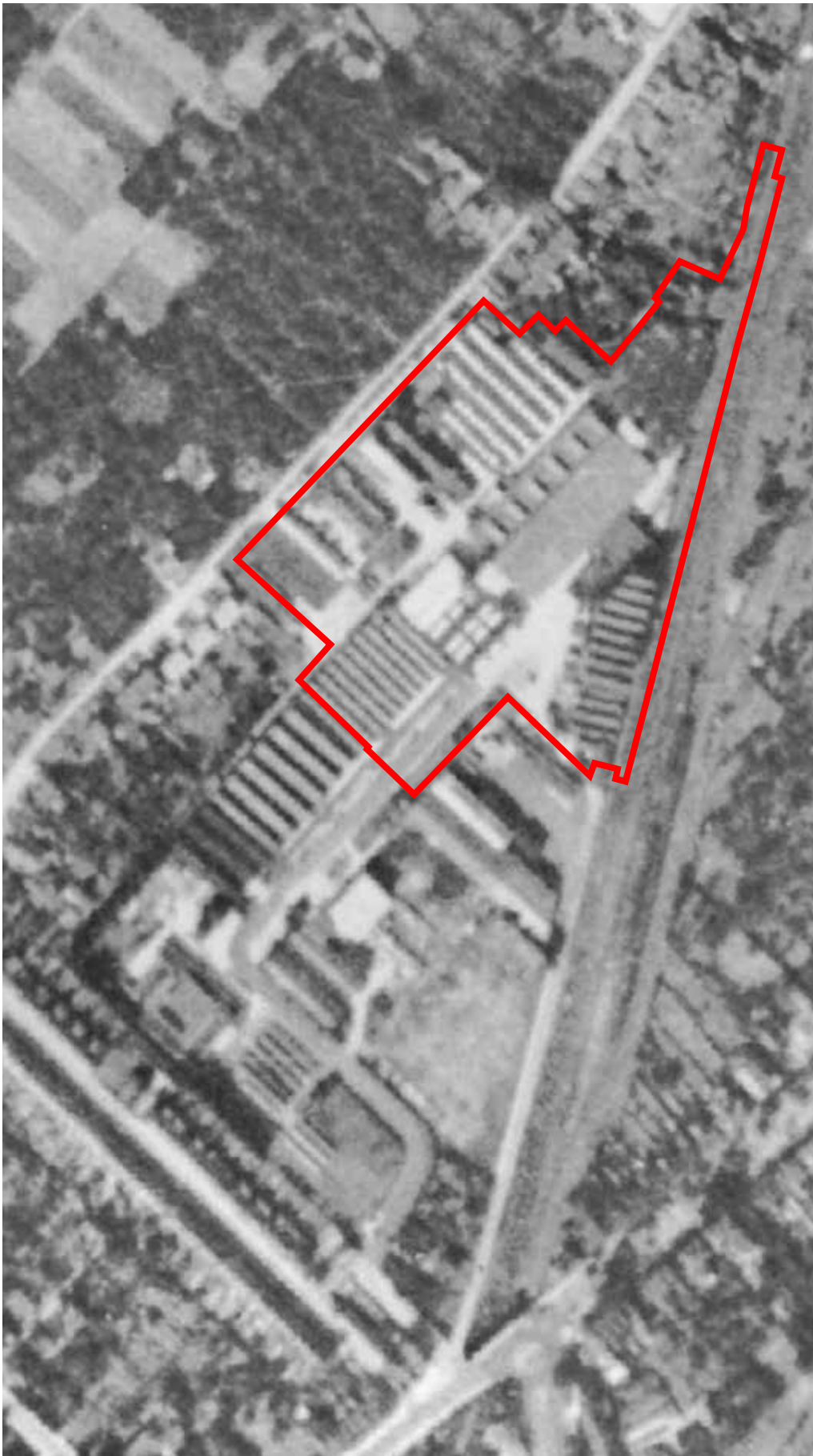
Gloucestershire Archives

Block plan of Sunningend Works prior to 11 December 1940; the buildings marked in red were destroyed by enemy bombing on 11 December 1940; the grey areas were occupied by H. H. Martyn (Aircraft) Ltd, the green areas by the Gloster Aircraft Company



Gloucestershire Archives

Block plan as proposed, 1942



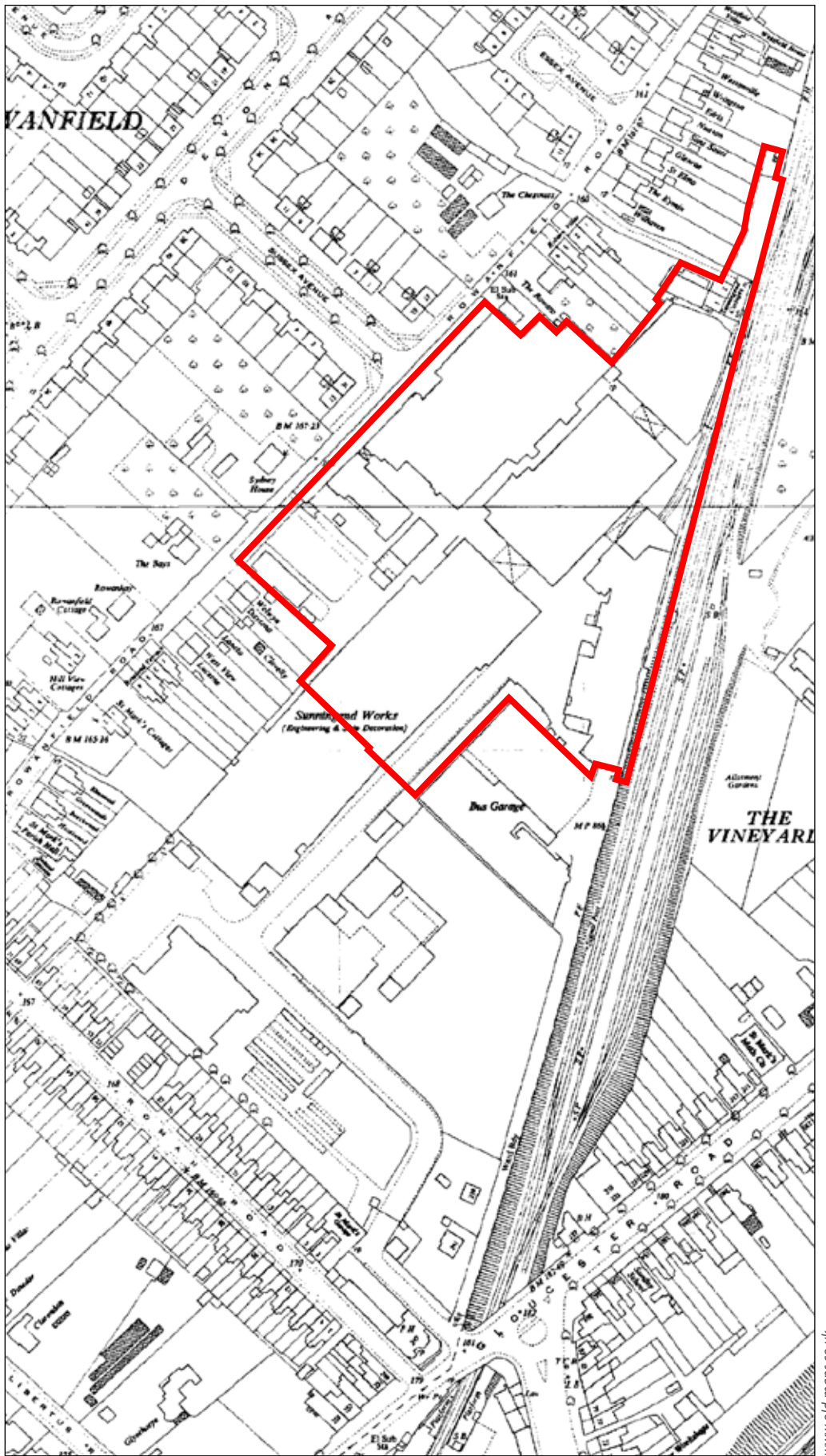
Google

Aerial photograph, 1945

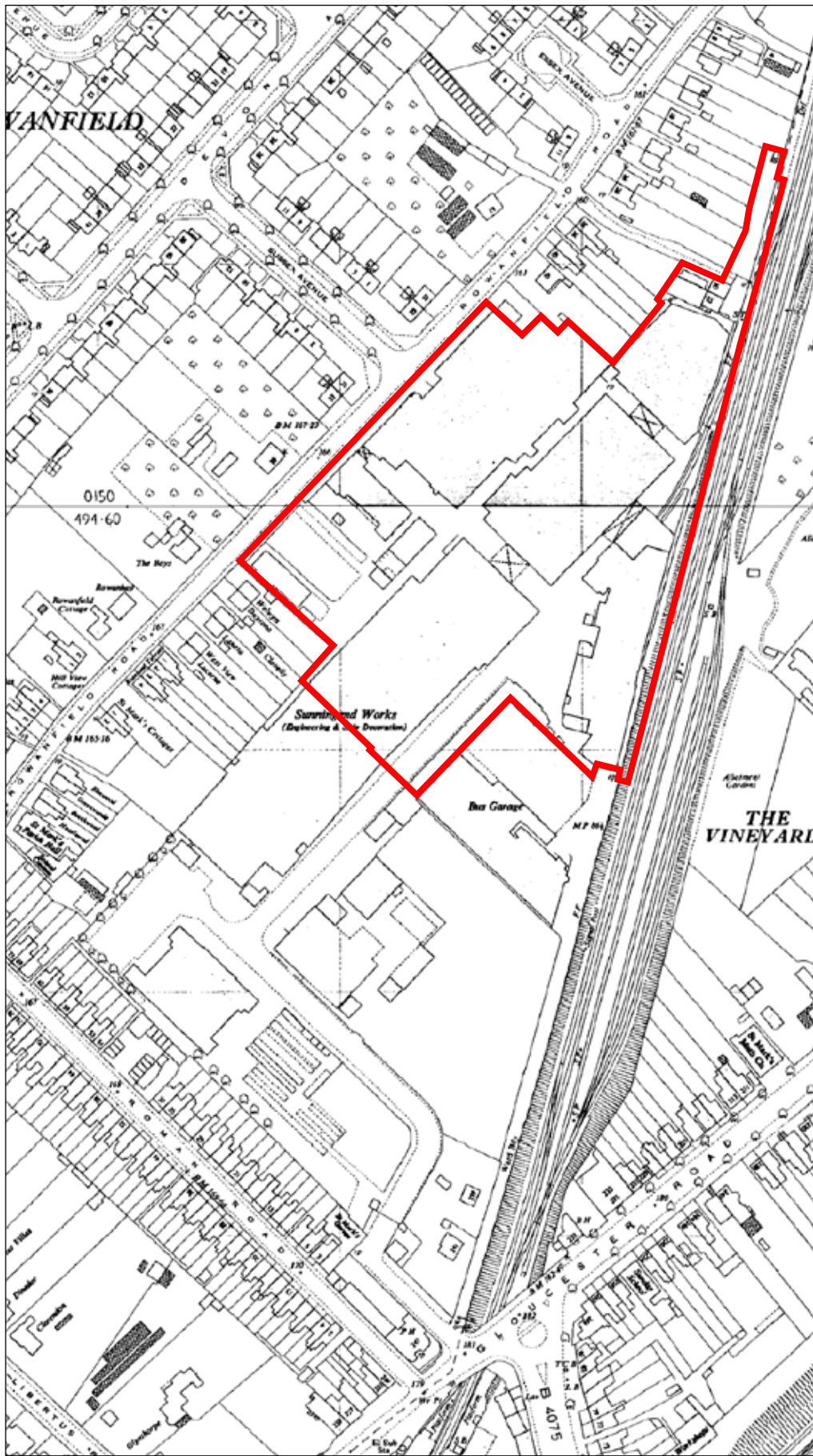
The post-war period

Following the Second World War, H. H. Martyn & Co. returned to its core business of ship decoration, undertaking decorative work on at least 57 ships between 1947 and 1966. The Sunningend Works also manufactured parts for 'Arcon' pre-fabricated houses. Other architectural contracts included a spire and cross for Debre Libanos monastery in Ethiopia (1962), and aluminium doors and windows for the Queen Elizabeth Hall and Purcell Room, London (1967), as well as extensive war damage restoration at the House of Commons, including the Speaker's Chair and Dispatch Boxes, and the pulpit at St Paul's Cathedral. Martyn's also continued to produce fine art and craft work right into the 1960s; the firm cast sculptures by Henry Moore, the Commando Memorial at Fort William (1952); the bronze statue of Winston Churchill in London's Guildhall (1955), and a statue of Robert the Bruce which was unveiled by the Queen at Bannockburn (1964).

As detailed by Whitaker (1998:212), Maple's sold H. H. Martyn to Macolland of South Wales, apparently for the value of its premises (which included a company sports field on the present site of Pate's Grammar School). Despite consistently having turned a profit, Macolland's wound up Martyn's in 1971.



Ordnance Survey, 1955-6



Ordnance Survey, 1967

2.5 The Site since 1971

Between 1971 and 1991, the Site was occupied by Schindler UK, a lift manufacturer. It was during this period that the present Unit 2A was erected, and the covered way between Units 8 and 11 was removed. It was also during this period that the two houses at the northern end of the present Site, in existence since at least 1883, were finally demolished.

Schindler UK was presumably also responsible for erecting the two office buildings with sheds behind, close to the southern corner of the present Lansdown Industrial Estate (Units 24, 26 and 27), as well as the shed opposite (Units 25, 25A and 25B) – all beyond the present Site boundary.

When Schindler UK left Cheltenham, the manufacturing business and assets at Sunningend were acquired by a group of private investors led by a former deputy managing director of Schindler UK. Around 60 Schindler employees remained with the new company, which had negotiated the rights to the name H. H. Martyn Ltd. For the first couple of years, the reborn H. H. Martyn was occupied with the completion of Schindler's order backlog, but it thereafter established itself as an independent supplier of lift cars. However, the firm went into administration in 2003 and the Sunningend Works became the Lansdown Industrial Estate.

Recent major developments have included the erection of Unit 6, which appears to have completely replaced the earlier general metal-working shop on the site. Probably at the same time Unit 7 was re-roofed, and all of its external walls with the exception of that to the south west were over-clad. The single-storey extension at the north-western corner of Unit 11 was removed between 2003 and 2007. Over the same period, the gap between Units 3 and 4 was infilled. Beyond the present Site boundary, Units 31-36 and Units 37-42 were erected in c.1999.

In April 2018, Cheltenham Borough Council confirmed that prior approval for the demolition of Units 11 and 12 was not required (ref. 18/00637/DEMCON). Unit 12 – originally Letheren's Vulcan Iron Works – has since been demolished.



Aerial photograph, 1999



Aerial photograph, 2007

2.6 Summary of existing buildings

2.6.1 Units 1 & 1A

The first building on the site of the present Unit 1 was the Trusty engine-testing house, which stood at its northern corner, and which was erected between 1883 and c.1899. Between 1907 and 1921, this was extended to the south east with a NW-SE aligned pitched-roofed element and two SW-NE aligned bays with bowstring truss roofs. Aerial photographs of the 1920s and '30s suggest that the south-eastern elevation of the latter volumes had large doors or shutters which allowed the whole side of the building to be opened up. Extending south-westwards from this collection of buildings there was, first, a long shed with a 10-bay northlight roof (the southern end of the present Unit 1), and then (over the site of the present Units 37-42) a further shed with a 6-bay northlight roof. A further pitched-roofed range abutted the south-eastern side of these two sheds; the north-eastern end of this survives as the present Unit 1A. Aerial photographs of the 1920s and '30s show that the south-eastern side of the latter range was mostly solid, punctured only by a few large doorways.

The original engine-testing house and pitched-roofed element were destroyed by enemy bombing in 1940. In c.1942, the destroyed north-western, north-eastern and south eastern external walls of both structures, and the roof of the former engine-testing house, were rebuilt, and the bowstring truss roofs were extended south-westwards over the space previously occupied by the pitched-roofed element. The south-eastern elevation was still openable at that time, but it has subsequently been infilled with brick. The fenestration in the (previously largely solid) south-eastern side of the range along the side of the 10-bay northlight structure (Unit 1A) clearly dates from the late 20th century. Unit 1 is connected to Unit 8 to the north east by a covered way.



Units 1 and 1A viewed from the south west

Page 133

Internally, the range along the side of the 10-bay northlight structure (Unit 1A) has undergone much modern subdivision, whilst both the 10-bay northlight structure itself and the volumes at the northern end of the building have seen the introduction of discrete storage units and makeshift lock-ups.



View south-westwards along the north-western elevation of Unit 1



View inside the northlight building over the tops of the inserted storage units and lock-ups



View south-westwards along the south-eastern elevation of Unit 1; the space between the two dark brick piers (marked) was historically openable, but has been infilled with brick



One of the bowstring truss roofs with inserted storage units and offices beneath



The south-western side of Unit A1 looking north; the present fenestration is modern



View of the pitched-roofed range (Unit 1A) abutting the south-eastern side of the northlight building (Unit 1)

2.6.2 Unit 2

Unit 2 was built between 1936 and 1940, at which time it was identified as a surface shelter. It comprises a single-storey, corrugated iron clad structure with timber casement windows. The roof is modern.



Unit 2 viewed from the north east



Unit 2 viewed from the south east

2.6.3 Unit 2A

Unit 2A was built between 1967 and 1999, almost certainly after the closure of H. H. Martyn & Co. in 1971, and comprises a single-storey, open-span structure with a shallow pitched roof. The building is clad in corrugated metal apart from its front (facing Rowanfield Road to the north west), which is of brick.



Unit 2A viewed from Rowanfield Road



Unit 2A viewed from the south east

2.6.4 Units 3 & 4

Units 3 and 4 were constructed between 1907 and 1921 as a canteen and a toilet block respectively. Arranged over two storeys and finished in roughcast, Unit 3 comprises a rectangular volume with a hipped roof with two gabled projections (with first-floor accommodation over an open 'loggia' between) to the south west, as well as a flat-roofed projection to the north east at its northern end. There has been some infilling of the 'loggia', and the present roof tiles and all the windows are modern. Unit 4 comprises a single-storey rectangular volume finished in roughcast and with a hipped roof. All the windows are modern. The gap between Units 3 and 4 was infilled between 1999 and 2007.



Units 3 (left) and 4 (right) viewed from the south



Unit 3 viewed from the south east



Unit 4 viewed from the south west



View of the ground floor of Unit 3

2.6.5 Unit 5

Historic aerial photographs show Unit 5 (erected as the foundry) **under construction in the early 1920s** and completed by 1925. As built, as evidenced by aerial photographs of 1931, the foundry comprised a roughly-square volume to the north west roofed with two tall northlights running NW-SE, together with two elements with pitched roofs arranged SW-NE to the south east. The latter elements have been altered and re-orientated such that their northern ends now feature a continuation of the northern northlight of the principal volume, whilst their southern ends are roofed with a pitched roof running NW-SE. The single-story element against the building's south-western side was added between 1932 and 1936.



Unit 5 viewed from Rowanfield Road



View of the south-western side of Unit 5



The remodelled south-eastern end of Unit 5

2.6.6 Unit 6

Unit 6 appears to be entirely modern, and replaced a general metal-working shop erected between 1932 and 1936. Map evidence suggests that the present building dates from between 1967 and 1999 – probably on the basis of its architectural treatment from the 1990s, and thus long after the closure of H. H. Martyn & Co. in 1971.



Unit 6 viewed from Rowanfield Road



The northern end of Unit 6 viewed from Rowanfield Road; the building in the foreground is an electrical substation



Unit 6 viewed from the southwest between Unit 5 (left) and Unit 8 (right)



View of the covered way between Unit 8 (left) and Unit 7 (right) towards the rear of Unit 6

2.6.7 Unit 7

Unit 7 appears to have been erected between 1936 and 1940 as a woodworking mill, although all of its external walls with the exception of that to the south west have been over-clad, and its roof has been replaced. Unit 7 is connected to Unit 8 to the south west by a covered way, and the building is interlinked to Unit 6.



Unit 7 viewed from the north east



Unit 7 viewed from the south

2.6.8 Unit 8

The present Unit 8 was erected in c.1942, following the destruction of the earlier buildings on this site by enemy bombing. The building was designed by Gordon & Fitch in association with H. Johnstone, and was identified on 1940s drawings as the tail plane shop. It is constructed of brick, now painted, and it retains most of its original steel-framed windows, although some have seen the insertion of modern plant. The building retains its original roof form comprising a taller central section with clerestory windows, and with six northlights in the section of roof to the north west. Unit 8 is connected to Unit 1 to the south west and Unit 7 to the north east by covered ways. The present Unit 6 was erected against the building's north-western elevation between 1967 and 1999.



Unit 8 viewed from the south



The south-eastern elevation of Unit 8



Unit 8 viewed from the first floor of Unit 11



Internal view of Unit 8

2.6.9 Unit 11

Unit 11 was erected between 1907 and 1921. Constructed of brick, much of it now painted, with an internal steel frame, the building is arranged over three storeys and has an 8-bay northlight roof. Some original metal-framed windows survive. As early as 1921, there had been a covered way between the present Unit 11 and the buildings on the site of the present Unit 8. Between 1936 and 1940, this was added to with a single-storey extension at the north-western corner of Unit 11. This extension was removed between 1999 and 2007. The building's original role is not known, but in the inter-war period it was used for cabinet making. Painted lettering on the building's eastern elevation includes the words 'Marblework', 'Glasswork' and 'Sculpture', which must relate to H. H. Martyn's activities, as well as the later 'Lansdown Industrial Estate'. Internally, the very deep steel beams suggest that the whole building originally comprised largely open floor plates. The ground- and first-floor levels have undergone a little subdivision; the second floor by contrast has undergone very considerable subdivision.

In April 2018, Cheltenham Borough Council confirmed that prior approval for the demolition of Unit 11 (and Unit 12, since demolished) was not required (ref. 18/00637/DEMCON).



Unit 2 viewed from Rowanfield Road



The single-storey extension at the northern end of Unit 11, photographed in 2003



The northern end of Unit 11



View of the northern end of the first floor of Unit 11



The eastern side of Unit 11 viewed from the south



Detail of some of the lettering on the eastern side of the building: 'Marblework' and 'Glasswork'

2.6.10 Units 15-17

Units 15-17 comprise an assortment of contiguous structures arranged along the north-western side of the adjacent Stagecoach bus depot.

The pitched-roofed volume towards the northern end of the range could conceivably be the 'brick-built offices or workshops' which formed part of Lot 3 in the Trusty Works sales particulars of 1907, and which appear to have been built between 1883 and 1901. The building may be that shown on the c.1899 engraving of the Trusty Engine Works. **Whist** this would make it the oldest building on the Site, it has clearly undergone much 20th century alteration.

In 1907, the site of the flat-roofed volume to the north east of the pitched-roofed volume (which wraps around the north-eastern corner of the present bus depot) was a 'party road', running between the tram depot and Letheren's Vulcan Works. The extant volume here probably has its origins in a structure built between 1907 and 1921, although if that is the case it has clearly undergone much alteration. All of its windows are late 20th century replacements.

The range to the south west of the pitched-roofed volume may have its origins in a further range built between 1907 and 1921, but it has also undergone much change, its north-eastern end having been extended upwards to accommodate a first floor. All of its windows are modern.



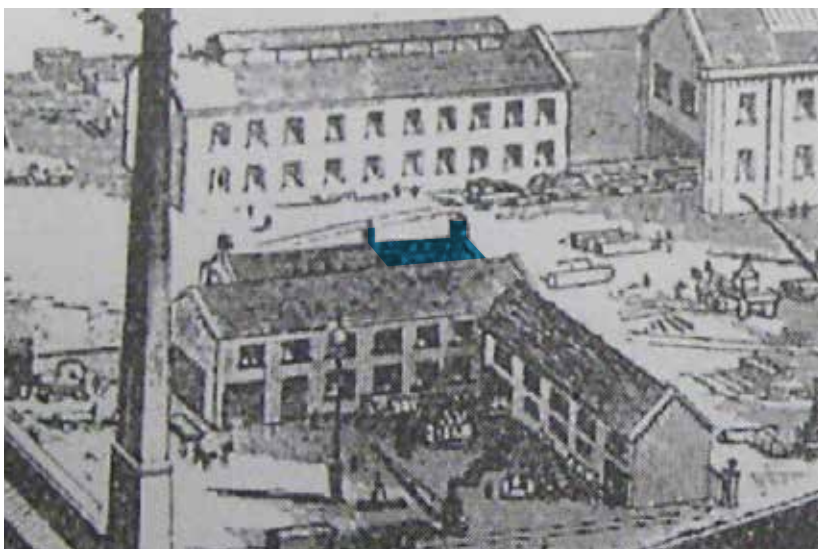
Units 15-17 viewed from the north east



The pitched roofed volume is thought to correspond with the the 'brick-built offices or workshops' identified in the Trusty Engine Works sale of 1907



The 'brick-built offices or workshops' as shown in the Trusty Works Sales Particulars of 1907



c.1899 engraving of the Trusty Engine Works, with what is thought to be the sole surviving element marked in blue



The flat-roofed volume which wraps around the north-eastern corner of the present bus depot has its origins in a structure built between 1907 and 1921 on the site of a 'party road'



The range to the south west has its origins in a further range built between 1907 and 1921

3.0 Heritage Interest

The northern half of the Lansdown Industrial Estate (the Site) is not within a conservation area and contains no designated heritage assets (statutorily-listed buildings) or non-designated heritage assets ('locally indexed' buildings). Nonetheless, this Heritage Appraisal has been prepared – following a request from the planning officer – to assess whether any of the buildings on the Site might be considered to possess a degree of heritage interest.

3.1 Site overview

As detailed in Chapter 2.0, the Lansdown Industrial Estate has been in industrial use since the late 19th century, starting with the Lansdown Iron Works in 1864. In 1872, William Letheren established the adjacent Vulcan Iron Works. The latter remained in this use until at least 1907, but by c.1895 the Lansdown Iron Works was in use as the Trusty Engine Works.

Whilst these early phases of the Site's history are of some historic interest, there is practically no surviving fabric to illustrate them. The only building on the application Site that might survive from these early phases of its history appears to be the pitched-roofed element towards the northern end of the range of Units 15-17, erected between 1883 and c.1899, which has been much altered, and was in any case an ancillary building of very secondary interest. The original Vulcan Iron Works – which later became Unit 12 – was demolished in 2018.

In 1907/8, the Site was acquired by H. H. Martyn & Co. and for the next 63 years it accommodated a huge range of skilled engineering and craft trades.

H. H. Martyn & Co.'s involvement in aircraft manufacture in both wars, and its role in providing architectural decoration for numerous important buildings and ocean liners, is clearly of considerable historic interest. However, it does not follow that this interest extends to the surviving Martyn buildings on the application Site. As discussed further below, Units 1, 1A, 2, 3, 4, 5, 7, 8, 11, 15 and 17 were all erected during H. H. Martyn & Co.'s tenure of the Site. Units 1, 1A, 5, 7, 8 and 11 were all manufacturing buildings. All of them are fairly generic industrial structures for their date, and all of them have undergone alteration, in some cases very considerable alteration. The buildings' designs do not, individually or collectively (even when considered alongside the other works buildings beyond the application Site boundary), reflect (in their plan forms or appearance) their role in the production processes that the Site accommodated, and there is no surviving historic machinery present. H. H. Martyn's field of activities was so diverse that the Site's capacity to accommodate different processes was continually tested. However, surviving evidence of the physical changes made to the Site over time cannot be held to be illustrative of the firm's changing output, or to provide evidence of particular technological developments. It is not known who designed most of the Martyn buildings. Where the architects are known – in the case of Unit 8 and part of Unit 1 (Gordon & Fitch in association with H. Johnstone) – those architects could not be described as architects of national or local note. In summary, whilst the works as a whole is of some historic interest, the surviving buildings on the application Site are at best of very limited historic and architectural interest.

The two buildings on the application Site that post-date H. H. Martyn & Co.'s tenure – 2A and 6 – are clearly of no heritage interest.

3.2 Summary of existing buildings

3.2.1 Units 1 & 1A

As detailed in Chapter 2.0, the present Units 1 and 1A have a complex history. The first phase of their development, at the northern corner of the present Unit 1, was erected between 1883 and c.1899, and for a while served as the Trusty engine-testing house. Following H. H. Martyn & Co.'s acquisition of the site in 1907/8, this building was much extended to the south east and south west. In 1936, the buildings accommodated wing assembly, pressed steel, doping, painting and polishing operations, as well as storage. In 1940, the original engine-testing house and some of the added structure to the south east were destroyed by enemy bombing, and much rebuilding and reconfiguration ensued. Further major alterations were made in the second half of the 20th century.

Whilst the use of this part of the Site as part of the Trusty Engine Works is of some historic interest, nothing is thought to survive of the original Trusty engine-testing house. The subsequent use of the extended, rebuilt and much altered buildings is also of some historic interest in the context of H. H. Martyn & Co.'s ever-changing manufacturing operations. However, there is nothing in the surviving fabric that is illustrative of the buildings' roles, or their place in the wider manufacturing process flow. Architecturally, what survives comprise unremarkable and much altered utilitarian structures of only very limited heritage interest.

3.2.2 Unit 2

As detailed in Chapter 2.0, Unit 2 was built between 1936 and 1940, at which time it was identified as a surface shelter. Although erected during H. H. Martyn & Co.'s tenure of the site, and illustrative of the site's wartime activity, the building appears never to have played an important manufacturing role. It is thus of negligible historic interest in the context of the wider site. Architecturally, it is an unremarkable, much altered utilitarian structure of no heritage interest.

3.2.3 Unit 2A

As detailed in Chapter 2.0, Unit 2A was built between 1967 and 1999, almost certainly after the closure of H. H. Martyn & Co. in 1971. It is an unremarkable utilitarian building of no architectural or historic interest.

3.2.4 Units 3 & 4

As detailed in Chapter 2.0, Units 3 and 4 were originally constructed between 1907 and 1921 as a canteen and a toilet block respectively, and thus were not historically used for manufacturing. The buildings have been much altered, most notably through the infilling of the space between them, but also through the partial infilling of the 'loggia' to Unit 3. The present roof tiles and all the windows are modern. Although erected during H. H. Martyn & Co.'s tenure of the site, the buildings are unremarkable structures of negligible architectural interest.

3.2.5 Unit 5

As detailed in Chapter 2.0, Unit 5 was erected as the foundry in the early 1920s. Although this role is undoubtedly of some historic interest in the context of the Sunningend Works as a whole, there appears to be nothing in the building's fabric that is illustrative of this specific function, or its place in the wider manufacturing process flow. The north-western end of the building, adjacent to Rowanfield Road, retains its original distinctive form with two tall northlights running NW-SE, and might be considered to have a degree of architectural interest. The south-eastern end of the building has been so altered that any architectural interest it might once have possessed has been effectively obviated.

3.2.6 Unit 6

As detailed in Chapter 2.0, Unit 6 appears to date from between 1967 and 1999 – probably on the basis of its architectural treatment from the 1990s, and thus long after the closure of H. H. Martyn & Co. in 1971. On this basis, it is of no historic interest. Architecturally, Unit 6 is an unremarkable building of its time, and of no heritage interest.

3.2.7 Unit 7

As detailed in Chapter 2.0, Unit 7 appears to have been erected between 1936 and 1940 as a woodworking mill, although all of its external walls with the exception of that to the south west have been over-clad, and its roof has been replaced. Although the building's role as the woodworking mill is of some historic interest in the context of the Sunningend Works as a whole, there is nothing in its fabric that is illustrative of that role, or its place in the wider manufacturing process flow. Any architectural interest the building might once have possessed has been effectively obviated by the extensive changes made to its external envelope.

3.2.8 Unit 8

As detailed in Chapter 2.0, The present Unit 8 was erected in c.1942, following the destruction of the earlier buildings on this site by enemy bombing. The present building was designed by Gordon & Fitch in association with H. Johnstone, and was identified on 1940s drawings as the tail plane shop. It is constructed of brick, now painted, and it retains some of its original steel-framed windows, although some have seen the insertion of modern plant. The building retains its original roof form comprising a taller central section with clerestory windows, and with six northlights in the section of roof to the north west.

H. H. Martyn's involvement in aircraft production in the Second World War is undoubtedly of some historic interest. However, that this involvement was limited to the manufacture of components (in this case plane tails) rather than the production or assembly of complete aircraft renders this interest less significant. The parts were almost certainly designed elsewhere, and the Sunningend Works must have been just one of many factories engaged in such wartime activity. Furthermore, there is nothing in the building's fabric that is illustrative of its original role as the tail plane shop, or its place in the wider manufacturing process flow.

Architecturally, the building is a fairly generic industrial structure for its date, and is of only very limited heritage interest. Neither Gordon & Fitch nor H. Johnstone could be described as architects of national or local note.

3.2.9 Unit 11

As detailed in Chapter 2.0, Unit 11 was erected between 1907 and 1921, although it has been subjected to very considerable alteration. In April 2018, Cheltenham Borough Council confirmed that prior approval for the demolition of Units 11 and 12 was not required (ref. 18/00637/DEMCON). The Council's Delegated Officer Report noted that:

The site is a large, detached commercial building approximately 90 years old. The site is not listed, not within a conservation area nor is it a community asset.

Unit 12 was demolished soon after the consent to do so was issued, and this means that Unit 11 can also be demolished at any stage without the need for further permissions in planning terms.

Although Unit 11's probable role in aircraft component manufacture is of some historic interest in the context of the works as a whole, there is nothing in its fabric that is illustrative of this role. That the building was also put to use for cabinet making (and marblework, glasswork and sculpture) is also of some historic interest, although only the painted lettering on the eastern elevation is actually reflective of this function. The building's changing role is illustrative of the fact that it was an adaptable utilitarian building, probably conceived to accommodate different processes from the outset. Architecturally, the building is a fairly generic industrial structure for its date, and is of only very limited heritage interest.

3.2.10 Units 15–17

Units 15-17 comprise an assortment of contiguous structures arranged along the north-western side of the adjacent Stagecoach bus depot.

As detailed in Chapter 2.0, the pitched-roofed volume towards the northern end, could conceivably be the 'brick-built offices or workshops' which formed part of Lot 3 in the Trusty Works sales particulars of 1907, and which appear to have been built between 1883 and 1901. The existing building may be that shown on the c.1899 engraving of the Trusty Engine Works. Whilst this would make it the oldest surviving building on the Site, and therefore give it a degree of historic interest, it appears always to have been somewhat ancillary to the site's principal manufacturing function. Furthermore, the building has clearly been much altered, and any architectural interest it once possessed has arguably been lost.

The elements to either side of the pitched-roofed volume probably have their origins in structures erected between 1907 and 1921. Whilst this places them during H. H. Martyn & Co.'s tenure of the site, which is of some inherent historic interest, there is nothing in their fabric that explains their role in the wider complex. They are unremarkable and much altered, and of no architectural interest.

4.0 Bibliography

4.1 Primary Sources

Aerial view of Sunningend Works, c.1920 [Gloucestershire Archives: D5922/4/1]

Alstone and Arle Inclosure Map, 1835 [Gloucestershire Archives]

Ashwell & Nesbitt Heating Engineers: H. H. Martyn & Co., Sunningend Works; plans and drawings [Gloucestershire Archives: D3944/9]

Cheltenham 'Old Town Survey', 1855-7 [Gloucestershire Archives]

Ordnance Survey Maps: 1885, 1887, 1903, 1923, 1932, 1955-6, 1967

Plans of new buildings for H. H. Martyn (Aircraft) Ltd, 1941-2 [Gloucestershire Archives: CBR/C5/6/3/11]

Sunningend Works: lease of part of works, 1921 [Gloucestershire Archives: D5922/2/2]

Sunningend Works: fire insurance plan, 1936 [Gloucestershire Archives: D5922/2/7]

Sunningend Works: plans and elevations relating to parts destroyed by bombing, 1940-41 [Gloucestershire Archives: D5922/2/11-14]

Young & Gilling (1907): *Particulars and Plan of the Freehold Factory Premises known as The Trusty Works situate at Cheltenham, adjoining the Midland Railway Station* [Gloucestershire Archives: D4858/2/3/1907/4]

4.2 Secondary Sources

Ambiente International LLP (June 2017): *Lansdown Industrial Estate: Environmental Review*

Brooks, Robin (2003): *The Story of Cheltenham*, Stroud: Sutton Publishing

Brooks, Robin (2003): *A Century of Cheltenham: Events, People and Places over the 20th Century*, Stroud: The History Press

Edgar, David (updated 2015): *A Geographical History of Hester's Way*, available at www.historyofhestersway.co.uk/geographical_history.pdf

Green, Chris [ed.] (1999-2013): *The History of Hesters Way, Vols. 1-5*, available at www.historyofhestersway.co.uk

James, Derek (1971): *Gloster Aircraft Since 1917*, London: Putnam & Company

James, Derek (1994): *Gloster Aircraft Company*, Bath: Alan Sutton

Jones, Anthea (2010): *Cheltenham: A New History*, Lancaster: Carnegie Publishing

Page 158

Little, Bryan (1952): *Cheltenham*, London & New York: B. T. Batsford

Rowbotham, Sue & Waller, Jill (2004): *Cheltenham: A History*, Chichester: Phillimore & Co.

Sheppard F. H. W. [ed.] (1973): *Survey of London: Volume 37, Northern Kensington*, London: London County Council

Verey, David & Brooks, Alan (2002): *Gloucestershire 2: The Vale and the Forest of Dean* [The Buildings of England], New Haven & London: Yale University Press

Whitaker, John (1998): *The Best: A History of H. H. Martyn & Co. also including the founding of the Gloster Aircraft Co.*, Cheltenham: Promenade Publications

<https://cheltonia.wordpress.com/>

www.britainfromabove.org.uk

www.gracesguide.co.uk

73 Great Titchfield Street
London
W1W 6RD
office@builtheritage.com
020 7636 9240

Built Heritage
Consultancy



Cheltenham
Civic Society

Lansdown Industrial Estate

This brief sets out:

- The history of the Lansdown Industrial Estate and its heritage significance.
- Current outline planning proposals for the site.
- An alternative proposal for the site.

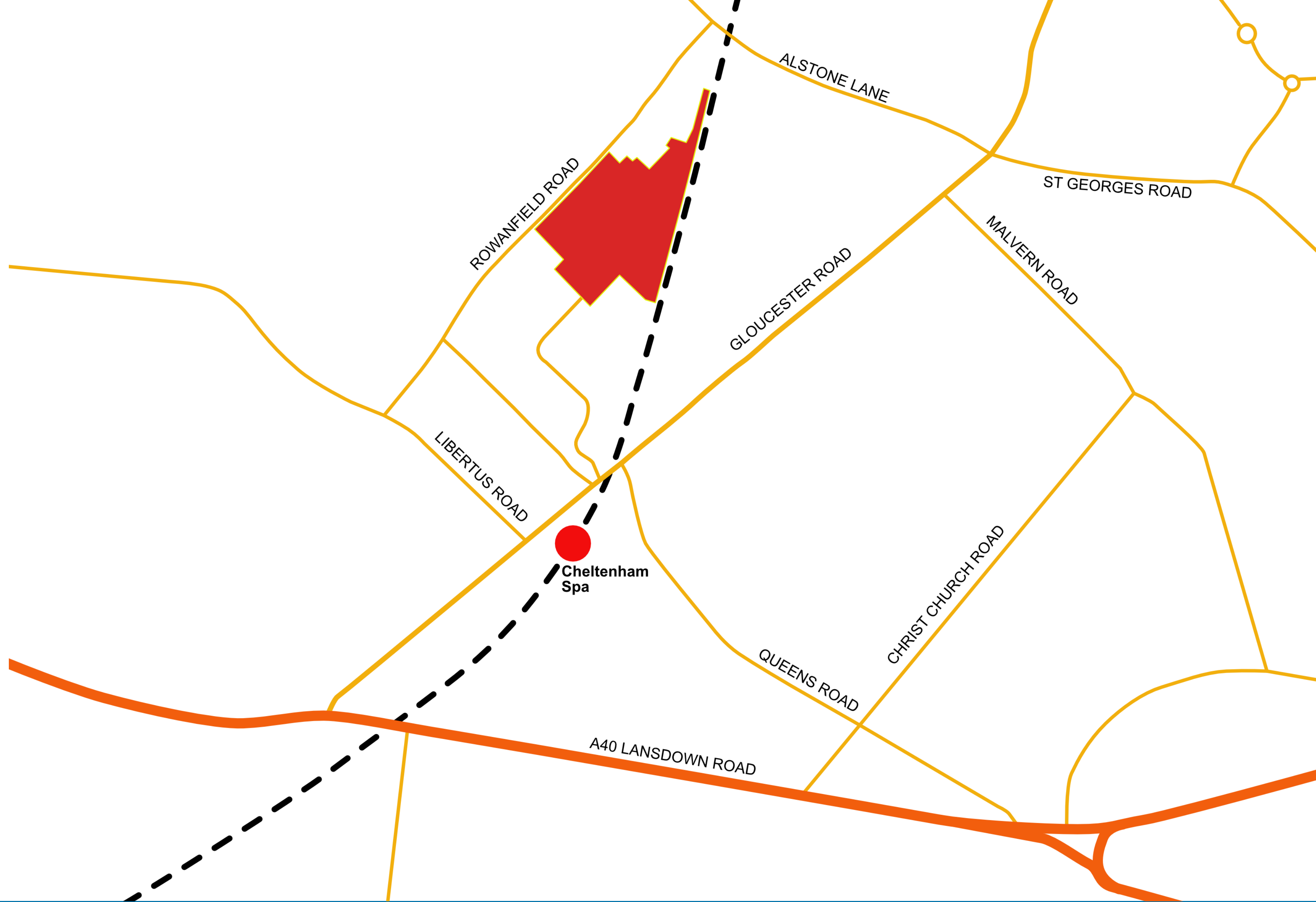


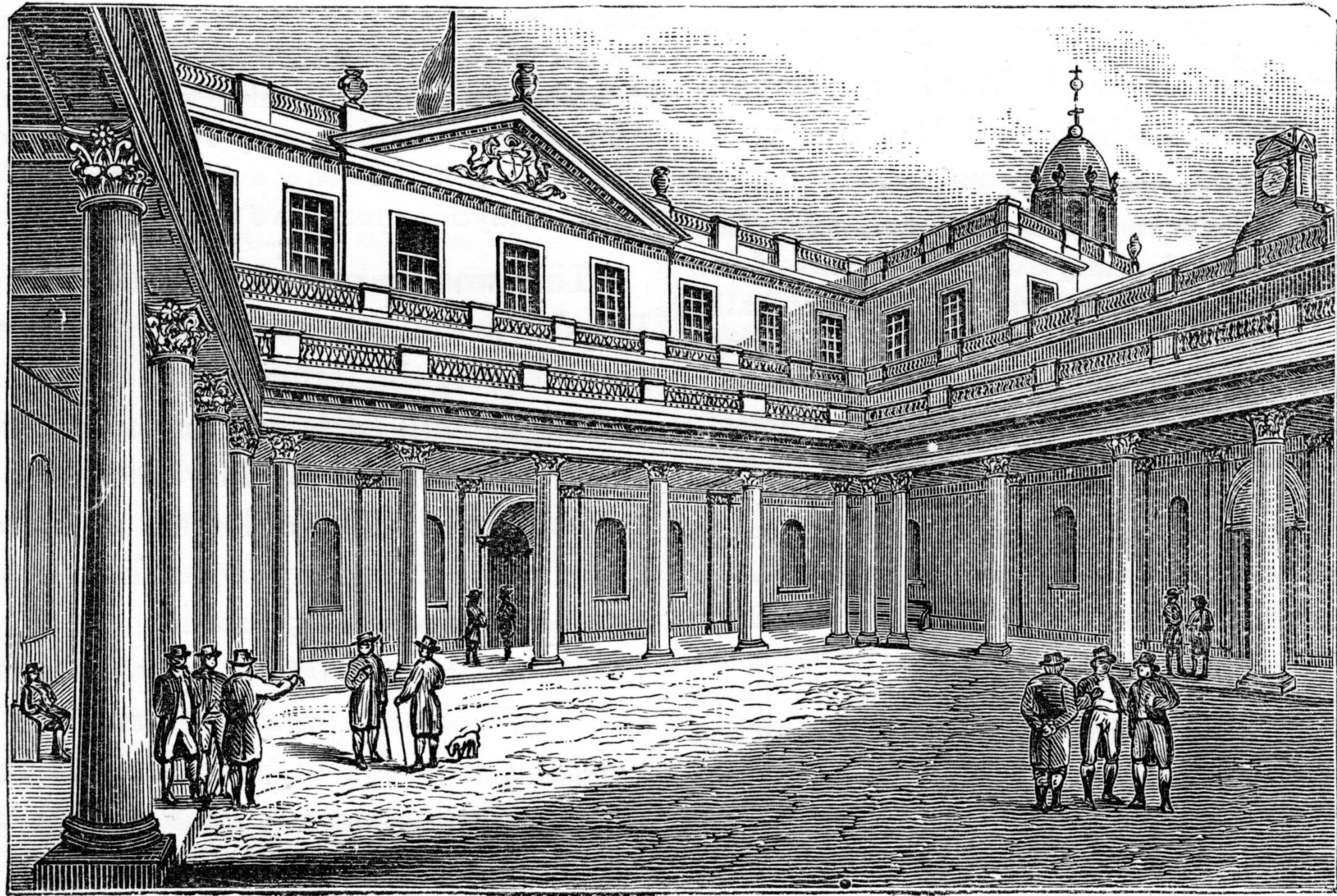
- The 160-year heritage of Lansdown Industrial Estate is significant locally, nationally and internationally, and not just for its Martyn's / Gloster Aircraft links.
- The site and its buildings are identifiable and readable.
- The surviving buildings deserve protection by formal listing and by finding sustainable reuse rather than wholesale demolition.
- Enabling development around those buildings would fund works and facilitate reinvestment and withdrawal of some capital.



Site History and Examples of Work







The Exchange, Bristol. Courtyard Roof 1872. (Grade I)



Chesterton Cemetery Gates and Railings, Cirencester 1871. (Grade II)

John Cormell, born 1833, outgrew his builder's yard in Tivoli Place. He moved his forge to the semi-rural site in 1864 where neighbourly complaints were unlikely, and gave it the Lansdown name.

1864-1872 – Cormell's Lansdown Ironworks





College of Arms Railings and Gates, London.
Originally at Goodrich Court (Grade I)



Overbury Court Gates, Kemerton.
(Grade II)



Guildhall Gates and Railings, Worcester (Grade I)

William Letheren worked for Cormell but acquired his adjoining site at same time and soon went alone. He was huge in his day, described as the 'greatest art iron-worker in England', winning awards with international acclaim and working with the country's foremost architects including EM Barry and George Gilbert Scott.





Temple Gardens Railings and Gates, London (Grade II)

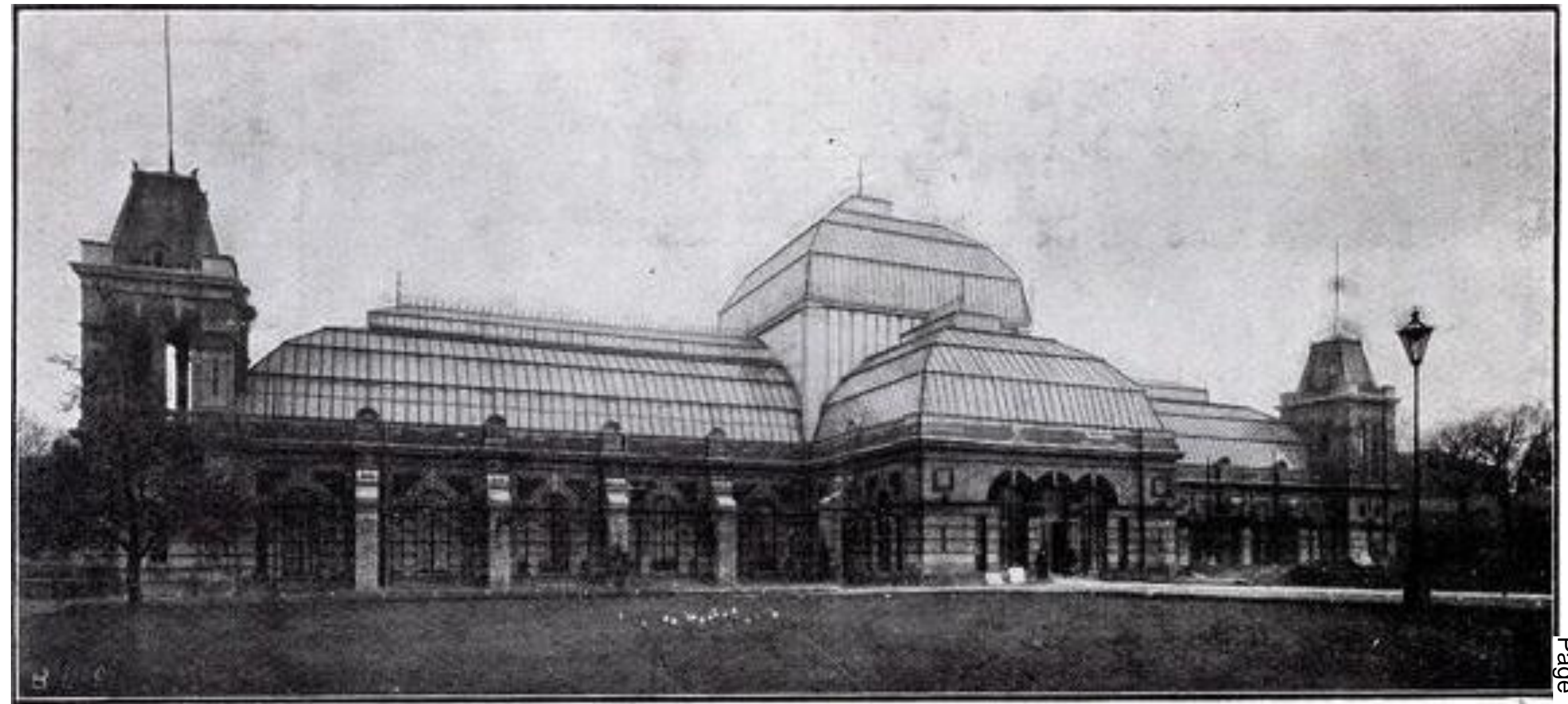
John Gibbs was Cheltenham-born and bought Cornell's works in 1873 but by 1875 was experiencing financial difficulties and the site was sold at auction. The 1881 Census shows that Gibbs returned to Staffordshire to work as a furnace man, his business career at an end.

1872-1875 – Gibbs' Ironworks





Temple Meads Roof, Bristol. 125 feet clear span 1876. (Grade I)



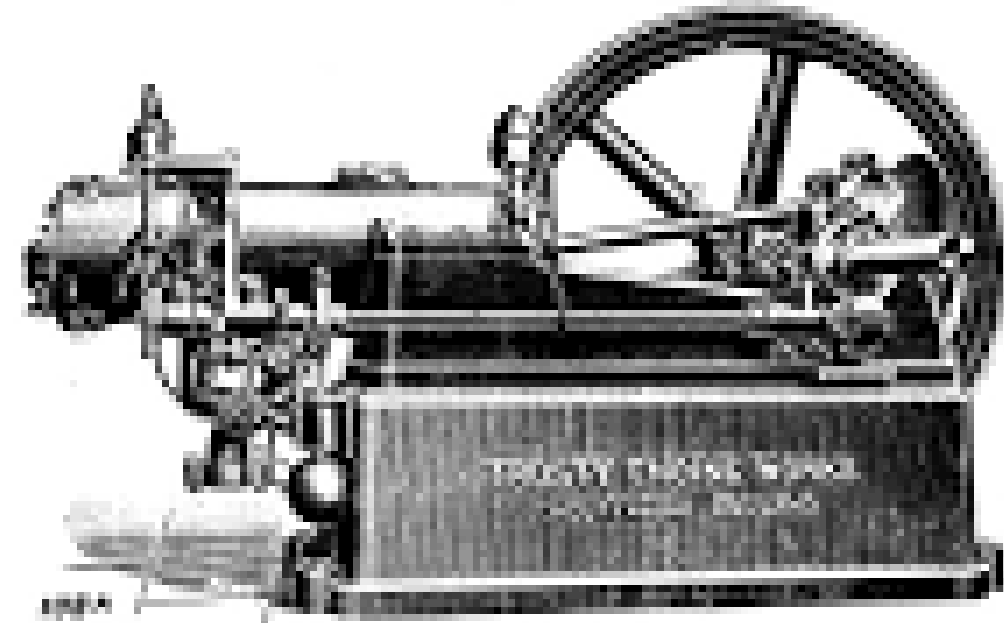
Winter Gardens Roof, Cheltenham 1876-78

Thomas Vernon and Paul Ewens closed their Liverpool office and brought the first heavy industry to Cheltenham, continuing the reputation for highly-skilled metal manufacturing and then carpentry. Amongst many notable projects, they constructed iron roofs over Cheltenham Winter Gardens and the railway stations at Swansea, Walworth and Brixton, and warehouses at Charlton in Kent and Plymouth Docks and Mount Edgcumbe Battery.

1875-1891 – Vernon & Ewens Central Ironworks



THE TRUSTY ENGINES. GAS, OIL, AND STEAM.



SPECIALLY ADAPTED FOR
ELECTRIC LIGHTING,
AND FOR FARM AND
ESTATE WORK.

LOW CONSUMPTION, RELIABILITY,
AND SIMPLICITY
GUARANTEED.

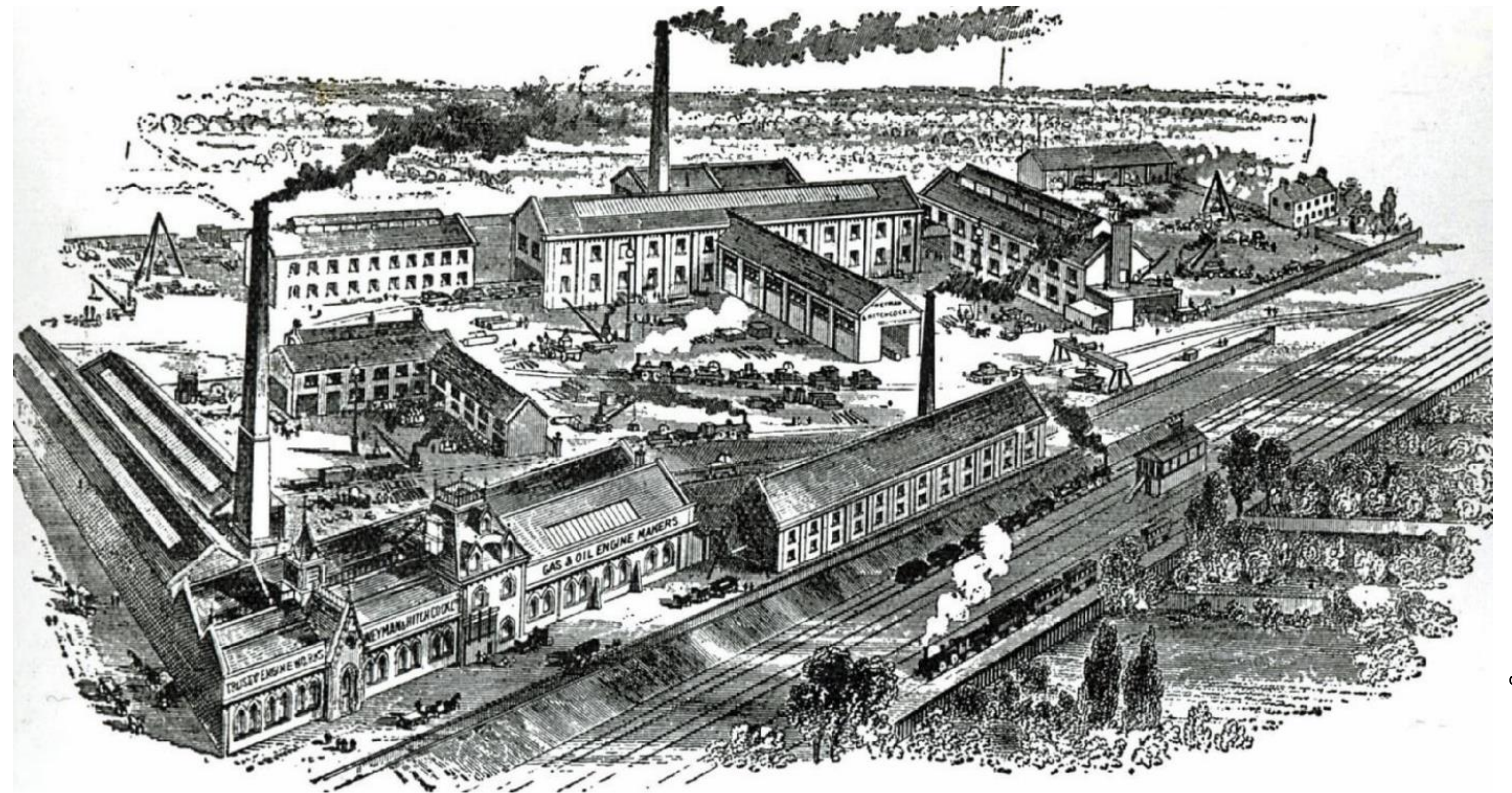
Catalogues, Testimonials, and
Reduced Price List on application.

W. WEYMAN & CO. ENGINEERS

THE SHILLINGFORD ENGINEERING CO., LTD.,

TRUSTY ENGINE WORKS, CHELTENHAM.

London Agents: FIELD, MALLETT & CO., Limited, 33 Abchurch Lane, E.C.



Established by Weyman & Hitchcock. Later became Shillingford Engineering Co Ltd.

- **First** successful application of tractive power on tram and railways.
- **First** permanent electric lighting in Cheltenham.
- **First** petrol driven vehicle ever to be driven on British roads was developed by Weyman and John Henry Knight.

1894-1904 – Trusty Engine Works





Based in Trusty's former foundry buildings that date from c1870, the bus station occupies the oldest surviving building on site. Second shed with CDLR stone plaque of 1901.



The Cenotaph, Whitehall, 1919-20.
(Grade I)



The Commando Memorial,
Spean Bridge 1951 (Category A)



The Speaker's Chair,
House of Commons, 1950

Exemplary wood, stone and plaster carvers, metal and glass workers, plus a wide range of activities that were unique for its time. The factory cast 75% of the UK's art metalwork 1920-38, employing 1,000 men by 1920. Gloster Aircraft Company formed on site and George Dowty worked here before founding Dowty Engineering with a loan from Martyn's.



Current Planning Situation



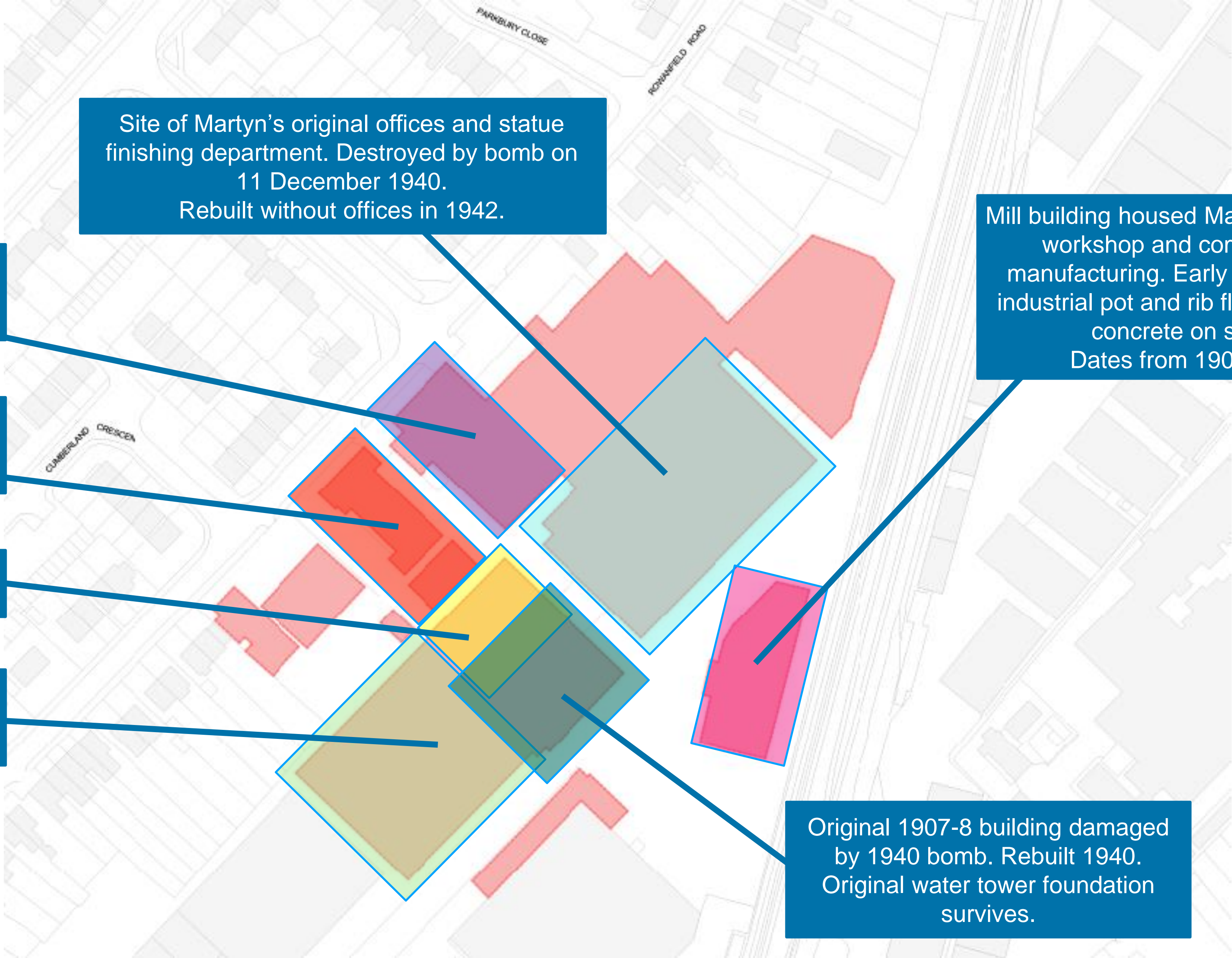
- 21/02832/OUT – Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.
- Cheshire West and Chester Council proposes to replace these historic buildings with a cramped, low-quality residential scheme.
- The proposal does not consider the site's rich heritage and would destroy all signs and links to it.
- As at 23 Feb 22, 48 objections have been lodged from 51 public comments.



- An unimaginative scheme that is dominated by car parking provision and a sea of 2m timber fences between gardens.
- Little account is taken of the character or spacing of existing residential patterns.
- The demolition and clearance of the whole site will release sequestered carbon, contrary to Cheltenham Borough Council's environmental aspirations.

Image: CBC Planning Portal





Site of Martyn's original offices and statue finishing department. Destroyed by bomb on 11 December 1940. Rebuilt without offices in 1942.

Mill building housed Martyn's plaster workshop and component manufacturing. Early example of industrial pot and rib floors, cast in concrete on site. Dates from 1907-10.

Martyn's foundry, where so many statues were cast. Dates from 1917-20

Martyn's employees' canteen and lavatory block. Arts & Craft style. Date from 1917

Original foundation of Trusty's 'Testing Shed'. Dates from 1887-99.

Martyn's stone carving, wood carving and clay modelling workshops. Dates from 1907-08.

Original 1907-8 building damaged by 1940 bomb. Rebuilt 1940. Original water tower foundation survives.

Image: CBC Planning Portal

Outline Demolition Proposal Shows the Potential Damage



Cheltenham Civic Society's Proposal



Enabling Development

This space could be developed with residential or mixed use spaces. Covering some 10,400 sqm, it could have a GDV of up to £12m and a resale value with planning consent of up to £5m.

Land Assembly

This land is outside the ownership of the applicant but lends itself to simultaneous redevelopment, especially as the neighbouring enabling development is presently leased to the owner. The owner operates buses from the site, which is awkward to enter and exit safely at the Gloucester Road junction. Time to relocate?

Image: CBC Planning Portal



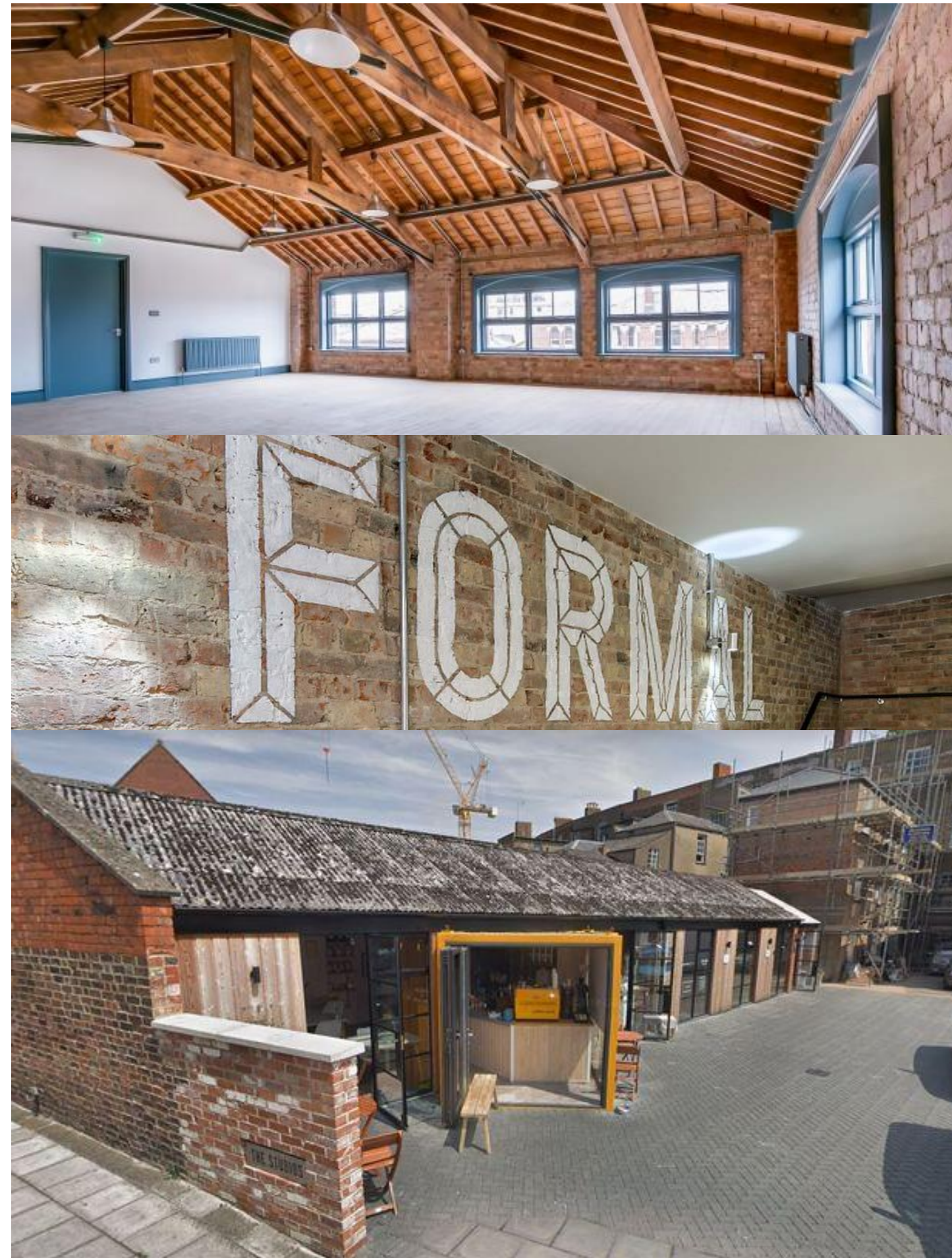
Commercial

Much of the site would be retained as commercial space, making the most of its Industrial style to create a stylish, high quality working environment with cafes, events and soft landscaping. Cheltenham has strong demand for high quality commercial space, complementing its strong retail market and high status lifestyle offer.

Flexible Redevelopment

These buildings lends themselves to reuse. They could be redeveloped to reinforce their Arts & Crafts and Industrial style and could provide up to 59 residential flats (GDV £10.3m) or live/work units or commercial units. Their distinct style lend themselves to high end, top rent units.





Cheltenham



Bristol Paintworks



Bicester Village

Similar Development Models



- The current application has paid no attention to the rich industrial heritage of the site and its surviving historic buildings.
- Cheltenham Civic Society's proposal would pragmatically preserve the historic buildings and clear away less important buildings to provide sites for enabling and flexible developments.
- This would play to Cheltenham's market strengths, where top end commercial space rents for £30psf, while a high quality development would ensure low churn, high occupancy and a highly desirable lifestyle vibe.

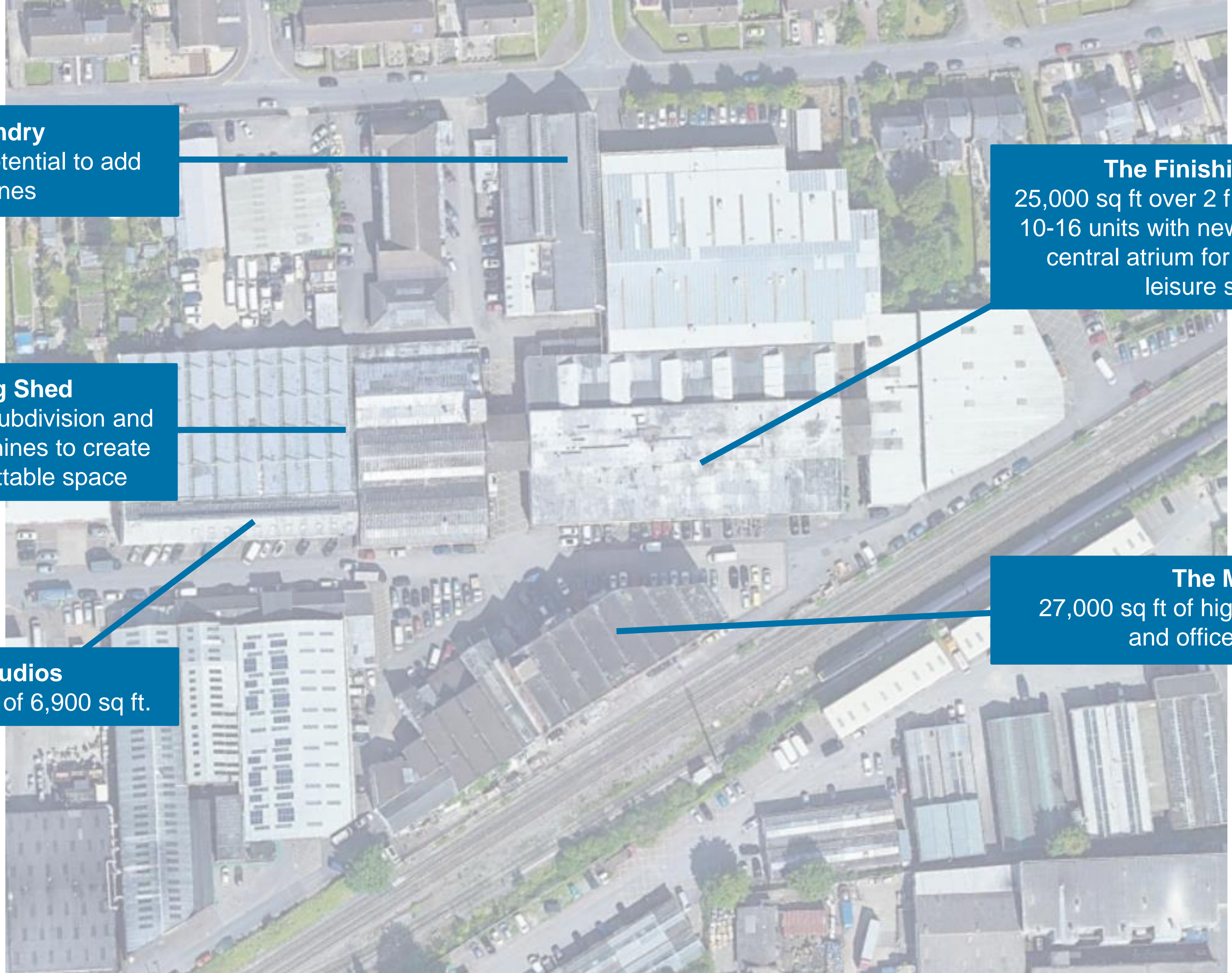


The 4 enabling development sites could generate a Gross Development Value (GDV) of £24.9m.

As a bare site with planning permission they would be worth £8.7m, viz:

Site	Type	GDV	Bare Value
A	7 x houses to maintain street rhythm and spacing	£2.45m	£825k
B	7 x houses to maintain street rhythm and spacing	£2.45m	£825k
C	Three storey apartment block as proposed	£10m	£3.5m
D	Three storey apartment block as proposed	£10m	£3.5m

In addition, the flexible redevelopment sites and the land assembly option could generate additional capital release and/or premium rental opportunities.



The Foundry
9,500 sq ft plus potential to add mezzanines

The Finishing Shop
25,000 sq ft over 2 floors and forming 10-16 units with new mezzanine and central atrium for exhibition and leisure space

The Testing Shed
Sheds capable of subdivision and insertion of mezzanines to create 46,000 sq ft of lettable space

The Mill
27,000 sq ft of high quality studio and office space

Artists' Studios
2 storeys with total of 6,900 sq ft.

Image Source: Google Earth

Proposed Commercial Space



- The remaining commercial buildings could be renovated with capital released from the sale of the enabling development land.
- This could create over 110,000 sq ft of high quality lettable space.
- Current commercial letting rates for Cheltenham are:

Type	Rate psf	Value to Lansdown
Basic Industrial Unit	£8-10	£880,000pa
Commercial Units	£11-16	£1,210,000pa
Office Units	£20-30	£2,200,000pa



Summary



- The current application falls well below the planning and architectural standards we would expect. It has paid no attention to the rich industrial heritage of the site and its surviving historic buildings.
- Cheltenham Civic Society's proposal would pragmatically conserve the historic buildings and clear away less important buildings to provide sites for enabling development.
- Our proposal respects the site's heritage, facilitates the owners' desire for capital and rental returns and helps to address local housing needs through sustainable development. We believe this creates a viable 'win' for all main parties.
- We want to work with the Applicants and Cheltenham Borough Council to deliver a pragmatic, sustainable and high-quality redevelopment.







21/02832/OUT LANSDOWN INDUSTRIAL ESTATE

RESPONSE TO HERITAGE AND BUILDING REPORTS

1. Cheltenham Civic Society wishes to lodge the following additional comments on the application. These are submitted with the benefit of deep local knowledge, primary research and a strong interest in the area. These same traits are, unfortunately, not demonstrated in the application.

Conservation Report.

2. Cheltenham Civic Society asked our historian, Jill Waller, to assess the applicant's updated heritage appraisal. Jill is probably the most authoritative local historian, having had numerous books and papers published on Cheltenham. She is also believed to be the only historian who has conducted primary research into the Lansdown Industrial Estate site, except for John Whitaker who wrote 'The Best' (Whitaker, 1985) about HH Martyn.

3. Jill could not believe how much the appraisers had got wrong about the site's history, right from the start, and how little they had actually researched and understood, apparently because they relied on outdated sources. Attached is her critique of the heritage appraisal, complete with highlighted heritage report. Her exceptional knowledge also satisfies NPPF para 194, which requires, as a minimum, the relevant historic environment record to have been consulted and the heritage assets assessed using appropriate expertise where necessary.

4. The bottom line is that the latest heritage appraisal is still far from satisfactory. As the Conservation Officer points out in his second submission, the assessment is very thin on detail and still fails to demonstrate a thorough understanding of the site, and thus the significance of it.

5. CBC's Conservation Officers rightly identify that industrial buildings, by their nature, do not necessarily have an aesthetic value but they can hold evidential, historical and communal value. The following detail is provided to assist CBC's Conservation Officers, Planning Officers and decision makers with understanding the specific significance of the site, and filling in the detail omitted by the applicants' heritage report.

6. Jill Waller's and Andrew Booton's assessment of the site's buildings, drawn from primary evidence including CBC's records, planning application dates, construction dates and uses, maps and plans and interviews with former employees. This should help CBC to assess the heritage significance of this site, which the applicant's heritage report fails to do. All these buildings can be identified in Historic England's aerial photos, which help to confirm their appearance and relative positions. The plan shows:

A. **Tramshed, c1890-1901.** Trusty's foundry, survived fire in 1897. Sits on the site of Cornell's original 1864 foundry so may have been used by Vernon & Ewens before Trusty. Probably the oldest structure on the site and despite being excluded from this planning application, is important for understanding the setting and context.

- B. **Tram Offices, 1901.** Date stone identifies this. Again, outside the scope of this application but important for historical context.
- C. **Block C, c1907-08.** Probably one of the first things Martyn's built, for their very messy fibrous plasterwork as well as asbestos work and woodcarving. Bears legible 'ghost signs' from Martyn's activities on the railway track side. Of interest, this building also appears to have good examples of beam and pot concrete floors, which must be amongst the earliest in the country. This is all the more worrying as the building already has consent for demolition yet it is worthy of formal listing.
- D. **Woodshop, c1908-16.** The building with the largest footprint for creating and assembling large structures.
- E. **Toilet Block, 1917.** Arts and crafts brick building.
- F. **Canteen Block, 1917.** Underneath the roughcast exterior and modern inappropriate uPVC windows is a handsome arts and crafts brick building of domestic style and proportion.
- G. **The Foundry, 1920.** 'At its height from 1920 to around 1938, Martyn's foundry cast 75% of all art metal work required in the country.' The Best, p99, Whitaker, J. This was the actual building from which that output originated, purpose built for the task and largely unaltered.
- H. **Pressed Steel Shop, 1942.** Constructed on the footprint of a previous building after a direct hit at the southern end on 11 December 1940. Contemporary to the Martyn's new office block (planning permission granted December 1941) that was completed in the southern site as the previous office had been destroyed. Incidentally, this later office has been used to showcase the firm's range of plasterwork, carvings and fittings, most of which remain in place.
- I. **Polishing shop, 1942.** The end of the Woodshop was bomb damaged so was made good.

Building Report.

7. The building report by Bruton Knowles clearly shows that the buildings are capable of renovation and reuse. Indeed, their overall sizes, solidity and layouts lend themselves very well to reuse for a range of commercial and residential purposes. Dilapidation through neglect should not be an excuse for simply demolishing them without full and detailed consideration for renovation and reuse. NPPF para 196 states that 'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.'

Protection

8. The heritage report is sadly passive on the significance of heritage and the damaging impact of this proposal on Cheltenham's industrial heritage. NPPF para 190 states (with our emphasis in italics):

Plans should set out a *positive strategy for the conservation and enjoyment of the historic environment*, including *heritage assets most at risk through neglect, decay or other threats*. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and *putting them to viable uses consistent with their conservation*;
- b) the *wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring*;
- c) the desirability of new development making a positive contribution to *local character and distinctiveness*; and
- d) *opportunities to draw on the contribution made by the historic environment to the character of a place*.

We do not believe that this application satisfies those considerations. Indeed, they deliberately contravene them. That is very disappointing and indicate underestimation of the importance of heritage, *laissez faire* approach to heritage management and consequent risks to the town's heritage. Cheltenham Borough Council has a duty to take a lead in setting out a positive strategy for the conservation and reuse of the site.

Alternative Proposals

9. Cheltenham Civic Society's letter and brief to all councillors of Cheshire West & Chester Council and Cheltenham Borough Council (attached) sets out the site's historical context. Importantly, it also sets out the Civic Society's proposal to retain buildings of historic interest but to demolish the poor quality buildings around them for enabling development. This satisfies NPPF para 197, which states that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Our letter and brief to councillors (attached) provides sufficient evidence to satisfy all 3 factors, unlike the applicant's submissions. Our proposals demonstrate not only the desirability to retain the historic fabric but the commercial, heritage and cultural rationale for doing so.

Conclusion

10. From the information we have provided, it should be evident that not only should the planning application be refused but Lansdown Industrial Estate should be formally protected for its historical, evidential and architectural value and its specific contribution to Cheltenham's industrial heritage. Long term protection would best be served by finding a sustainable use for the buildings, which Cheltenham Civic Society has proposed and demonstrated feasibility. We urge Cheltenham Borough Council to refuse the application and to take steps to protect this important site, which is likely to be the last industrial site in Cheltenham of significant heritage importance.

Cheltenham Civic Society Planning Forum comments on planning application 21/02832/OUT

Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access. | Lansdown Industrial Estate Gloucester Road Cheltenham Gloucestershire <https://publicaccess.cheltenham.gov.uk/online-applications/applicationDetails.do?activeTab=dates&keyVal=R4YXCEELJ6600>

OBJECT

The Cheltenham Plan (adopted July 2020) Policy MD1 states that Lansdown Industrial Estate is for employment led regeneration which may include an element of residential development.

POLICY MD1: LANSDOWN INDUSTRIAL ESTATE	
Site description	The site is capable of redevelopment for mixed-use, including a continued element of employment in better-quality units together with some new residential development. There would be a net loss of employment land but this should be offset by an upgrade in the quality and density of premises.
Site area	5.5ha
Constraints	<ul style="list-style-type: none">• Contaminated land• Highways access
Site specific requirements	<ul style="list-style-type: none">• Employment led regeneration which may include an element of residential development provided that existing provision is offset by a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site• Measures to mitigate the impact of noise and vibration caused by railway line• Safe, easy and convenient pedestrian and cycle links within the site and to key centres• A layout and form that respects the existing urban characteristics of the vicinity

The intent therein is clear: Mixed use (that doesn't seem to mean just splitting the site and piling in the houses) with *some* new residential offset by an upgrade in quality and density. It could also mean work-live units and a better range of premises.

This scheme is not compliant with the policy. The applicant's other application at the southern end of the industrial estate 21/02828/OUT is much more suitable for the site, and perhaps some residential development on the Rowanfield Road periphery of the site could also be considered - if it does not constrain the current uses of the industrial estate.

There is also the aspiration for a net gain in the number and quality of jobs. Regarding the housing, the policy requires a layout and form that respects the surroundings, which this proposal fails to do.

Statement of Community Involvement

- Cheltenham Civic Society was not consulted or involved in this exercise.
- The site is being portrayed and referred to as PDL/Brownfield yet is occupied at a high rate, sustaining jobs and economic vitality through supply chains and customers.

- The generalised and anonymised list of comments from the consultation actually emphasises the negative effects of this proposal rather than the positive opportunities and effects, showing that there are significant risks and adverse elements that must be addressed.
- The Localism Act 2011 s110 (1) and (3) set out the duty to cooperate between authorities, even if they are not direct neighbours.

Illustrative Masterplan

- Notwithstanding the dominance of residential use, contrary to policy, the plan shows a distinct lack of imagination. The layout is antisocial and in lines yet without the benefit of lessons learned from terraced housing, such as gentle density, street trees, enclosure.
- Car parking is particularly badly handled, with a sea of end-on parking in front of every unit, poor provision for the number of units and with poor layouts that will encourage kerbside parking with the risks to access for emergency and refuse vehicles.
- The enclosure pattern will create a dense framework of 6' fences that is damaging to urban wildlife, destructive of sightlines and, ironically, no contributor to privacy.
- The scheme does not follow the area's pattern of housing so it disrupts the streetscape instead of enhancing and contributing positively to it.
- The scheme fails to NPPF paragraph 126 says, 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.' This proposal fails to meet this requirement or the additional detail set out in NPPF paragraph 130.

Environmental Sustainability

- The Localism Act 2011 s110 (3) and (4) are directly relevant in assessing this proposal's strategic development and its sustainable development. This is not evident in this proposal.
- Best practice from Create Streets and others show the need for mixed use developments, including social activities such as pubs and shops. These features are missing from a development of this size in this location.
- The 15/20-minute development concept is specifically covered by the proposal yet it fails to deliver on any of the essential components, such as shops. The closest store is a small Tesco Metro near the railway station.
- The principal desire line for those wishing to access or leave this new housing area on foot or bicycle will probably be to the station (trains, taxis and buses) and the small group of shops nearby (inc. Tesco). The plan proposes they do this by passing through the remaining part of the industrial estate. This could be hazardous (heavy lorries, parking all over the place) and unpleasant. Yet there is a back road running alongside the railway, part of which could be used as a safe pedestrian and cycle route while the rest of the road could continue to provide access to some of the industrial properties beside it. That could be achieved by the removal of the parking in this road.
- The scheme should include a walking/cycle route to the station alongside the railway line rather than via a dreary and potentially hazardous route through the industrial estate.
- This application highlights the problems of parking within the curtilage of terraced properties. The consultation acknowledges that Building Regulations will be introduced this year to ensure that electric vehicles can be charged from the new properties' electricity supply.
- The proposals show all the properties on the Rowanfield Road frontage will have parking in their front gardens. As a result, there will be a continuous dropped kerb giving pedestrians no protection from vehicles on this busy road. This is in addition to the multiple parking manoeuvres reversing in or out of these spaces.

- All the other properties within the site do not have parking within the curtilage, which will not comply with the proposed Building Reg requirement. Parking allocation is less than one space per unit. Inevitably these issues reinforce the concern that too many units are proposed for this site.
- The consultation response regarding short lived tree species, relates to colder climates than ours. Wikipedia extract below confirms this
"Paper birch is a typically short-lived species. It handles heat and humidity poorly and may live only 30 years in zones six and up, while trees in colder-climate regions can grow for more than 100 years. Owing to the moderating effect of the North Atlantic Current on the Irish and British temperate maritime climate, Britain, and Ireland even more so, have milder winters than their northerly position would otherwise afford. This means that the USDA hardiness zones relevant to Britain and Ireland are quite high, from 7 to 10"
Our climate zone is 7 and may go higher as a result of Climate Change. If they are proposing longer lived street trees, there needs to be larger spaces for them to grow properly and provide the necessary shading. Again, there are too many units proposed for this site to achieve the suggested tree planting
- A new development presents an opportunity for a community power scheme rather than bolt on inefficient micro generation units to each unit.

Economic Sustainability

- The application creates an image of a run down, low occupancy industrial site but that is a situation that has been engineered by the landlord to enable this proposal.
- The proposal seeks to remove and displace a significant number of businesses with high employment and occupancy.
- The 'Elms Park' proposal to surround Kingsditch commercial area with housing will stifle that area's economic growth potential. Alongside that, this proposal also risks stunting the town's commercial and employment vitality and indeed viability. CBC cannot claim to want to provide economic sustainability and youth retention and skills growth and all the other economic benefits if it keeps damaging the commercial footprint and sustainability of the town as a whole with piecemeal proposals such as this.
- This proposal is not employment led regeneration. It is the wholesale demolition of a large proportion of the industrial estate, including workplaces which currently employ an estimated 75 employees.
- It also includes the demolition of the Lansdown Art Studios, studio space for 21 artists. There is a desperate shortage of studio space in Cheltenham (as demonstrated by Lansdown Art Studios' long waiting list). Affordable studio space with natural light, 24 hour access, a community of artists and good pedestrian and cycle access should be valued and retained.
- People living in Cheltenham do not just need homes. They also need somewhere to work, to build and grow businesses and to create.
- Cheltenham has already lost significant amounts of employment land to residential developments - especially housing for older people. A further loss of employment land will lead to an increase in commuter journeys to larger employment centres such as Bristol or Birmingham, with all the costs of commuting (time and money) and the negative effects on work/ life balance. Moving employment land to out of town sites will increase reliance on private motor vehicles, and the increased pressures on the climate, congestion and parking that they bring.

Heritage

- NPPF para 130 states, inter alia, that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- This site was once HH Martyn's Sunningend Works and was the largest employer in the Cheltenham area for many years, with over a thousand men on the roll building high quality castings in metal, plaster and bronze. The site was also the original site of the Gloster Aircraft Company, which was a subsidiary of HH Martyn & Co and later a spin off.
- The buildings the developer proposes to demolish are the oldest and most significant on the site. The demolition will eradicate any trace of HH Martyn's contributions to Cheltenham or the world.
- The heritage of this site is far too important to treat in this way. The scheme needs a complete rethink to make the most of the heritage, the buildings and the site for the benefit of the town and the developer.

Summary

The developer has picked the wrong architects and delivery partners and haven't understood either the site's potential or Cheltenham's strengths and markets.

The applicant is a local authority, which should know better than to produce such a cynical and poorly considered scheme. This proposal should be exemplary but falls far short of best practice. There is no way that Chester would approve of such a low quality scheme and we would expect them to do better in a town such as Cheltenham too.

Local Planning Authority
Add 1
Add 2
Add 3
Add 4
Add 5
Post Code

Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

Date 03/02/2022
Your ref: 21/02832/OUT

Ask for: Christian Loveday

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings.
LOCATION: Lansdown Industrial Estate Gloucester Road Cheltenham

Description of proposal

The proposed development comprises the redevelopment of the northern half of Lansdown Industrial Estate to provide approximately 220 dwellings with associated car and cycle parking. It is proposed that the dwellings would be a mixture of houses and flats with a 40/60 split respectively

Existing site conditions/site context

The site currently operates as an industrial estate.

The site is located to the west of Cheltenham town centre. The current development has an access from both the B4633 Gloucester Road to the south and Rowanfield Road to the north.

Lay out

No indicative street typography has been submitted at this stage however the developments lay out shows that a high level of cycle and pedestrian movement around and through out the site can be achieved safely.

The site has cycle and pedestrian permeability to the north and south through the site.

The level of permeability through the site is welcomed and will provide a vital connectivity between residential areas to the south and north. Previously the site in its

Email: Christian.loveday@gloucestershire.gov.uk



www.gloucestershire.gov.uk

current use has been a barrier to this type of movement. Other directions of permeability (east) are locked by the railway line .

Given the likely demand for travel by sustainable modes, a high quality of pedestrian and cycle infrastructure should be provided within the site. This can take the form of material and design. It is thought that as shown the proposed site plan/ Lay out there is the physical ability to provide the high quality of sustainable travel infrastructure expected.

As mentioned above there will be possibly high demand for movement through the site, there for above minimum widths of footway and cycle way should be provided.

At reserved matters stage the development will need to provide cycle infrastructure which meets LCn1/20 standards. We urge designers to interact with the highway agreement team as early as possible to ensure these standards are met and designs are safe, implementable and will be used.

Level surfaces are permitted and welcomed, however there should be some form of separation between pedestrian and vehicular areas. This can be achieved via subtle placement of a range of street furniture. The over arching design of the level surface should be to make a drive feel like they are in a pedestrian area to ensure speeds are kept low.

As stated previously an indicative street typography has not been shown but will need to be addressed in detail with in reserved matters applications. The current lay out of the site, expected vehicle movement and scale/intensity of use of the site would lend its self to the use of level surfaces through out the site. in the more internal residential areas, however the very western section of the spine should be segregated due to its interaction with the surrounding highway network. Further east the spine can transition to a level surface to inform drivers that they are entering a residential area and to reduce

Car and Cycle parking

Cycle parking will be required to be shown with secure convenient and weather proof cycle parking provided for all types of residential units. Cycle parking should be in line with MFGS standards

The proposed quantum of off street car parking should be provided in line with MfGS minimum standards.

The current lay out shows that plot sizes and the indicative lay out of the highway will be able to physically provide for the estimated quantum of car and cycle parking.

The submitted transport assessment has looked at car ownership in this ward for flats and house and proposes the following:

"..apartments would be provided with between 0.5 (1 bed) and 0.7 (2 bed) spaces per dwelling, and houses would be provided with 1 spaces per dwelling (2 bed) and 2 spaces per dwelling (3 bed). An additional provision for visitor parking would be made at 0.2 spaces per dwelling / one parking space per five dwellings in accordance with GMfS."

Given the developments location and interrogation of car ownership data the slight reduction in parking for apartments is accepted.

The development will not look to alter the existing CPZ to the south of the site as such future residents of the development will not be eligible for permits.

Visitor parking can be provided in off street locations but should be located as to not obstruct the flow of traffic, cycle infrastructure or the path of larger vehicles.

Electric vehicle charging should be provided in line with the specification made in the 2021 revision of the MfGS. The current proposed lay out highlights no barriers as to why this can not be achieved at present.

The submitted TA states that the development will look to provide and implement MfGS suggested EV charging specification.

Servicing, deliveries and refuse collection

Swept paths have not been provided to show that vehicles can turn within the internal sections of the site. Neither have any specific loading areas been provided.

Swept paths have been shown for a larger vehicle to enter and exit the site using the proposed access alignment. Which is suitable.

It is thought that there is the ability within the proposed lay out to provide turning heads and other facilities internally which can accommodate service/ emergency and refuse vehicles.

on/off street loading areas should be provided in front of communal bin stores. Looking at the lay out plan it is expected that this would relate to the flats/ apartments, but would also be suitable for collections of single family dwellings if required.

Access

Design

The proposed development access broadly aligns with the sites existing access.

The proposed access has suitable visibility, meeting manual for streets requirements at 30mph and above.

Swept paths have been shown for a worst case scenario vehicle, and for the worst case scenario vehicle meeting an oncoming vehicle, while this has been accepted that this occurrence will be unlikely given the scale of the development, this information shows that the design of the access is robust.

Public Realm / Highway's Impact

The transport statement has provided details of the developments impact during AM and PM peaks the development will contribute a maximum of 14 further trips to the surrounding highway network. This equates to an extra vehicle every 4 minutes. This level of impact will not be perceivable.

It should be noted that when the proposed level of trip generation is compared to the level of vehicular movement associated with the existing extant industrial use on the site.

The comparison between existing extant permission and proposed uses represents a significant reduction in vehicle trips associated with the proposed development, both in number and size.

Due to the above no junction assessments have been undertaken.

Mitigating measures

The submitted TA states that the following will be delivered off street on Roman road

- a build-out with dropped kerbs along Roman Road at the access to Lansdown Industrial Estate would be introduced to protect right-turning cyclists and to

improve visibility for pedestrians crossing at this point. (drawing- 05400-SK-007-P2)

The above is welcomed and will aid sustainable travel in this area. It is thought that the above proposals will be able to be implemented and provided the desired level of mitigation for the development

Summary/recommendation

Given the comparison between the extant permission and the proposed development the level of useage on the site is considered a de intensification and the impact on the surrounding highway would be minimal. Trip generation information has been provided to show that the impact of trips generated by the development would not be perceivable even when compared to the actual operation on the site.

The proposed access has shown to be safe and fit for purpose with no impact on the operation of the surrounding highway network.

Given the above a recommendation for outline approval is supported as the development will not generate a significant negative impact on the performance and safety of the surrounding highway network or its users.

Conditions

Conformity with Submitted Details (Multiple Buildings)

The Development hereby approved shall not [be occupied/be brought into use] until the access, parking and turning facilities that that individual building to the nearest public highway has been provided.

Reason: To ensure conformity with submitted details.

Provision of Vehicular Visibility Splays

The development hereby approved shall not be [occupied/brought into use] until visibility splays are provided from a point 0.6m above carriageway level at the centre of the access to the application site and 2.4 meters back from the near side edge of the adjoining carriageway, (measured perpendicularly), for a distance of [Insert] meters in each direction measured along the nearside edge of the adjoining carriageway and offset a distance of 0.6 meters from the edge of the carriageway. These splays shall thereafter be permanently kept free of all obstructions to visibility over 0.6m in height above carriageway level.

Reason: In the interests of highway safety.

Highway improvements / offsite works / site access (Details Provided)

The Development hereby approved shall not be occupied until the highway improvements/offsite works/Site acces works comprising:

Email: Christian.loveday@[gloucestershire.gov.uk](mailto:christian.loveday@gloucestershire.gov.uk)

Works A as shown on drawing 05400-SK-007-P2

Have been constructed and completed and signed off.

REASON: To ensure the safe and free flow of traffic onto the highway.

Completion of Vehicular Access

The development hereby approved shall not be occupied until the means of access for vehicles, pedestrians and cyclists have been constructed and completed.

Reason: In the interest of highway safety

Combined Parking Details

Vehicle and cycle parking shall be provided prior to first occupation of each dwelling in accordance with details to be contained within the approval of any reserved matters permission. Such details shall include a scheme for enabling charging of electric plug-in and other ultra-low emission vehicles. Parking and charging points shall be maintained for this purpose thereafter.

REASON: To promote sustainable travel and healthy communities

Residential Travel Plan

The Residential Travel Plan hereby submitted shall be implemented and monitored in accordance with the regime contained within the Plan. In the event of failing to meet the targets within the Plan a revised Plan shall be submitted to and approved in writing by the Local Planning Authority to address any shortfalls, and where necessary make provision for and promote improved sustainable forms of access to and from the site. The Plan thereafter shall be implemented and updated in agreement with the Local Planning Authority and thereafter implemented as amended.

REASON: To reduce vehicle movements and promote sustainable access.

Construction Management Plan

Prior to commencement of the development hereby permitted details of a construction management plan shall be submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the

Email: Christian.loveday@gloucestershire.gov.uk

demolition/construction period. The plan/statement shall include but not be restricted to:

- Parking of vehicle of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);
- Advisory routes for construction traffic;
- Any temporary access to the site;
- Locations for loading/unloading and storage of plant, waste and construction materials;
- Method of preventing mud and dust being carried onto the highway;
- Arrangements for turning vehicles;
- Arrangements to receive abnormal loads or unusually large vehicles;
- Highway Condition survey;
- Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.

Informatives

Works on the Public Highway

The development hereby approved includes the carrying out of work on the adopted highway. You are advised that before undertaking work on the adopted highway you must enter into a highway agreement under Section 278 of the Highways Act 1980 with the County Council, which would specify the works and the terms and conditions under which they are to be carried out.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk allowing sufficient time for the preparation and signing of the Agreement. You will be required to pay fees to cover the Councils costs in undertaking the following actions:

Drafting the Agreement

A Monitoring Fee

Approving the highway details

Inspecting the highway works

Email: Christian.loveday@gloucestershire.gov.uk

Planning permission is not permission to work in the highway. A Highway Agreement under Section 278 of the Highways Act 1980 must be completed, the bond secured and the

Highway Authority's technical approval and inspection fees paid before any drawings will be considered and approved.

Highway to be adopted

The development hereby approved includes the construction of new highway. To be considered for adoption and ongoing maintenance at the public expense it must be constructed to the Highway Authority's standards and terms for the phasing of the development. You are advised that you must enter into a highway agreement under Section 38 of the Highways Act 1980. The development will be bound by Sections 219 to 225 (the Advance Payments Code) of the Highways Act 1980.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk. You will be required to pay fees to cover the Councils cost's in undertaking the following actions:

- Drafting the Agreement
- Set up costs
- Approving the highway details
- Inspecting the highway works

You should enter into discussions with statutory undertakers as soon as possible to co-ordinate the laying of services under any new highways to be adopted by the Highway Authority.

The Highway Authority's technical approval inspection fees must be paid before any drawings will be considered and approved. Once technical approval has been granted a Highway Agreement under Section 38 of the Highways Act 1980 must be completed and the bond secured.

Impact on the highway network during construction

The development hereby approved and any associated highway works required, is likely to impact on the operation of the highway network during its construction (and any demolition required). You are advised to contact the Highway Authorities Network Management Team at Network&TrafficManagement@gloucestershire.gov.uk before undertaking any work, to discuss any temporary traffic management measures required, such as footway, Public Right of Way, carriageway closures or temporary parking restrictions a minimum of eight weeks prior to any activity on site to enable Temporary Traffic Regulation Orders to be prepared and a programme of Temporary Traffic Management measures to be agreed.

Protection of Visibility Splays

The applicant's attention is drawn to the need to ensure that the provision of the visibility splay(s) required by this consent is safeguarded in any sale of the application site or part(s) thereof.

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be approved subject to the above conditions.

Yours Sincerely

**Christian Loveday
Principle Development Co-ordinator**

Gloucestershire County Council Community Infrastructure Planning Application Representations

Date: 14 th December 2022
To Lucy White
From: GCC Developer Contributions Investment Team
Application Ref: 21/02832/OUT
Proposal: Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.
Site: Lansdown Industrial Estate
Summary: Contributions will be required to make the development acceptable in planning terms

SECTION 1 – General Information

This application has been assessed for impact on various GCC community infrastructure in accordance with the “Local Development Guide” (LDG). The LDG was updated in March 2021 (following a targeted consultation which took place in Spring 2020). The LDG is considered a material consideration in the determination of the impact of proposed development on infrastructure.

<https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-local-development-guide/>

The assessment also takes account of CIL Regulations 2010 (as amended)

In support of the data provided please note the following: -

Education

Gloucestershire County Council (GCC) has undertaken to review its Pupil Product Ratios (PPRs) which are used to calculate the impact of new development on school capacity and in turn justify the developer contributions being sought towards the provision of additional education infrastructure. In the meantime, GCC is using Pupil Yields in line with the Interim Position Statement dated June 2021. The updated pupil product ratios (PPR) in line with the Interim Position Statement can be found at the below link

The latest School Places Strategy 2021 – 2026 is also available from the same web page at the link below. The School Place Strategy (SPS) is a document that sets out the pupil place needs in mainstream schools in Gloucestershire between 2021-2026. The SPS examines the duties placed upon GCC by the Department for Education (DfE) and it explains how school places are planned and developed. The 2021-2026 update was approved by Cabinet on 24 March 2021 and came into effect on 1 April 2021.

<https://www.gloucestershire.gov.uk/education-and-learning/school-planning-and-projects/gloucestershire-school-places-strategy-and-projects/>

Cost Multipliers - The DfE has not produced cost multipliers since 2008/09, so in the subsequent years we have applied the annual percentage increase or decrease in the BCIS Public Sector Tender Price Index (BCIS All-In TPI from 2019/20). GCC calculates the percentage increase using the BCIS indices published at the start of the financial year and uses this for all indexation calculations during the year for consistency and transparency.

This assessment is valid for 1 year, except in cases where a contribution was not previously sought because there were surplus school places and where subsequent additional development has affected schools in the same area, GCC will reassess the Education requirement.

Any contributions agreed in a S106 Agreement will be subject to the appropriate indices.

Libraries:

- Under the provisions of the Public Libraries and Museums Act 1964, Gloucestershire County Council is a Library Authority and has a statutory duty to provide a comprehensive and efficient library service for all persons desiring to make use of it. This duty applies not only to the existing population of the County, but also to new residents generated through new development which add to the demand on a specific library which those new residents can be expected to use.
- New development will be assessed by the County Council to determine its likely impact on existing local library services and the scope of resultant mitigation works that are required.
- Consideration will be given to the existing capacity of the library using the national recommended floorspace benchmark of 30 sq metres per 1,000 population (as set out in the *Public Libraries, Archives and new development: A Standard Charge Approach, 2010*).
- Planning obligations required towards improving customer access to services within the footprint of an existing library will be in the form of a financial contribution, and calculated using the County Council's established per dwelling charge of £196.00.
- Planning obligations required towards new library floorspace and fit out (i.e. extension to an existing building or construction of a new library building) will be considered by the County Council on a case-by-case basis.

SECTION 2 – Education and Library Impact - Site Specific Assessment

SUMMARY: Developer Contributions for: 21/02832/OUT and Lansdown Industrial Estate

A summary of the likely contributions (note these figures can be subject to change over time because of for example; updated multipliers and education forecasts) are found below.

Education summary:

Phase of Education	Name of closest non-selective school and/or the education planning area.	No of qualifying dwellings (QD)	Multiplier	Total Pupil Yield from QD	Contribution Requested (£)	Number of places requested
Primary	Hesters Way Primary Planning Area and/or other primary schools as listed <=2 miles walking distance	161	18,133	61.99	£0.00	0 Places
Secondary - 11-16	Cheltenham Bournside School and/or Cheltenham Secondary Planning Area	161	23,775	27.37	£650,721.75	27.37 Places
Secondary - 16-18	Cheltenham Secondary Planning Area	161	23,775	9.66	£0.00	0 Places

Calculation: Multiplier x Pupil Yield = Maximum Contribution

GCC has included the planning area for each of the phases of education as without further investigation of the schools; an appropriate project may not be achievable on a particular site.

Please see further clarification of this education summary below.

Clarification in relation to education summary on previous page regarding 21/02832/OUT and Lansdown Industrial Estate

This analysis refers to an outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access at Lansdown Industrial Estate, Gloucester Road, Cheltenham.

This application will impact on schools in the following education planning areas: -

- **9161820 Hester's Way Primary Planning Area, and**
 - 9161800 Swindon Road Primary Planning Area
 - 9161840 Hatherley-Leckhampton Primary Planning Area
 - 9161810 Whaddon Primary Planning Area
- **9162500 Cheltenham Secondary Planning Area**

The schools factored into the review are determined by identifying the site from the LPA planning portal and then identifying the closest schools using the following publically available tools to provide straight line distance, before calculating travel distances (if further information is required, please refer to tab 2 of the corresponding education data sheet)

- <https://www.gloucestershire.gov.uk/education-and-learning/find-a-school/>
- <https://get-information-schools.service.gov.uk/>

*Cost multipliers updated and applied from DfE Scorecard figures, these are 2019 (pre-pandemic).
<https://www.gov.uk/government/collections/school-places-scorecards>

Primary Places Impact

The proposal is for 215 dwellings, including 54 x 1-bed dwellings, therefore the net number of qualifying dwellings for education (i.e. 2 beds or more) will be 161 qualifying dwellings. This number of qualifying dwellings for education would be expected to generate an additional demand for 61.99 primary places which based on current forecast data can be accommodated in local schools within statutory walking distance. Therefore, Gloucestershire County Council is not seeking a contribution towards primary places for this development at this time (if further information is required, please refer to tab 3 of the corresponding education data sheet).

- The closest schools to this site are Rowanfield Infants (0.4 miles) and Junior (0.5 miles) Schools in the 9161820 Hester's Way Primary Planning Area (PPA). There are a further 4 schools in this PPA.
- In total there are 19 schools which are <=2 miles from the proposed development across 4 different PPAs
- The data for all schools has been provided in the embedded development data assessment. (Tabs 2 & 3)

- Schools should be considered to be full at 95% capacity to allow for some flexibility for in-year admissions; see Local Development Guide <https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-local-development-guide//> page 14, pt. 56.
- When assessing forecast surplus or shortfall we look to the penultimate year of forecasts as they are calculated using NHS GP data, therefore the final year of forecasts will not include all births for that forecast year.
- When considering forecast data and the schools within the scope for a development we can determine 95% of the relevant forecast year to ascertain the level of surplus/deficit of places in order to calculate whether there are places to credit to a development.

	All Schools ≤2miles
Total Capacity	6083.00
95%	5778.85
Forecast year 2024/25 for school(s)	5267.00
Surplus places available to credit to development	511.85
Cumulative yield from permitted development	206.75
Surplus places available to credit to development	305.10
Primary Yield from proposed development	61.99
Number of places requested	0.00

- It should be noted that there is a significant cumulative yield from applications already further along in the planning process which are currently 'Awaiting Decision'; timings of permissions being granted by the LPA and subsequent work commencing could have an impact on the need for contribution requests for this development if this is delayed beyond the 12 months that this assessment is valid.

Secondary (age 11-16) Places Impact

The proposal is for a total of 215 dwellings, including 54 x 1-bed dwellings, therefore the net number of qualifying dwellings for education will be 161 dwellings. This number of qualifying dwellings for education would be expected to generate an additional demand for 27.37 secondary (age 11-16) places; schools are forecast to be full, therefore Gloucestershire County Council is seeking a secondary (age 11-16) contribution of £650,721.75 towards the provision of those places (if further information is required, please refer to tab 5 of the corresponding education data sheet).

- This proposed development falls in Cheltenham Bournside School's catchment area in the 9162500 Cheltenham Secondary Planning Area. This school is also the closest secondary school at 1.2 miles.
- There are a 6 schools in total in the Cheltenham SPA, including a grammar school, the data for all schools has been provided in the embedded workbook.
- As with primary, we review based on 95% capacity being considered to be full to allow for some flexibility.

	Catchment School #	All Schools Total
Total Final Capacity	1959.00	7337.00
95%	1861.05	6970.15
Forecast year 2028/29 for school(s)	1779.00	7110.00
Surplus places available to credit to development	82.05	-139.85
Cumulative yield from permitted development in SPA	91.29	91.29
Surplus places available to credit to development	-9.24	-231.14
Secondary Yield from proposed development	27.37	27.37
Number of places requested	27.37	27.37

Post 16 Places Impact:

The proposal is for 215 dwellings, including 54 x 1-bed dwellings, therefore the net number of qualifying dwellings for education (i.e. 2 beds or more) will be 161 qualifying dwellings. This number of qualifying dwellings for education would be expected to generate an additional demand for 9.66 secondary (age 16-18) places which can currently be accommodated, therefore Gloucestershire County Council is not seeking a secondary (age 16-18) contribution of towards provision at this time (if further information is required, please refer to tab 5 of the corresponding education data sheet).

6th Form Data		Current May 2022		6th Form Forecast 2022						
Secondary School	6th form capacity	Y12	Y13	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
All Saints' Academy	250	104	69	169	166	205	235	242	234	213
Cheltenham Bournside School	460	125	155	289	345	366	372	363	347	333
Balcarras School	361	172	193	364	378	393	391	368	365	367
Pate's Grammar School	450	242	229	487	514	524	519	519	525	536
Total for Y12 and Y13		643	646							
Combined Totals		1289		1309	1403	1488	1517	1492	1471	1449
Total 6th Form Capacity	1521									

- There is currently a surplus of 72 places, with a yield of 32.22 places from already permitted development to apply, therefore adequate places remain to accommodate need arising from this development; however, it should be noted that there is potentially a significant yield to come from applications currently 'awaiting decisions'.

Section 2: Library Impact - Site Specific Assessment

Libraries:

The nearest library to the application site, and the library most likely to be used by residents of the new development, is Hesters Way Library.

The new development will generate a need for additional resources at this library, and this is costed on the basis of £196.00 per dwelling. A financial contribution of £42,140 is therefore required to make this application acceptable in planning terms.

The financial contribution will be put towards improving customer access to services through refurbishment and upgrades to the library building, improvements to stock, IT and digital technology, and increased services.

SECTION 3 – Compliance with CIL Regulation 122 and paragraphs 54 and 56 of the NPPF (2021)

Regulation 122(2) of the Community Infrastructure Levy Regulations, 2010 provides that a planning obligation may only be taken into account as a reason for granting planning permission where it meets the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

As a result of these regulations, Local Authorities and applicants need to ensure that planning obligations are genuinely 'necessary' and 'directly' related to the development'. As such, the regulations restrict Local Authorities ability to use Section 106 Agreements to fund generic infrastructure projects, unless the above tests are met. Where planning obligations do not meet the above tests, it is 'unlawful' for those obligations to be taken into account when determining an application.

Amendments to the Community Infrastructure Levy Regulations 2010 were introduced on 1 September 2019. The most noticeable change of the amendment is the 'lifting' of the 'pooling restriction' and the 'lifting' of the prohibition on section 106 obligations in respect of the provision of the funding or provisions of infrastructure listed on an authority's published 'regulation 123 list' as infrastructure that it intends will be, or may be, wholly or partly funded by CIL (as a result of the deletion of Regulation 123).

Any development granted planning permission on or after 1 September 2019 may now be subject to section 106 obligations contributing to infrastructure that has already benefited from contributions from five or more planning obligations since 6 April 2010 and authorities are allowed to use funds from both section 106 contributions and CIL for the same infrastructure. However, the tests in Regulation 122 continue to apply.

The Department for Education has updated its guidance in the form of a document entitled "Securing developer contributions for education (November 2019), paragraph 4 (page 6) states:

“In two-tier areas where education and planning responsibility are not held within the same local authority, planning obligations may be the most effective mechanism for securing developer contributions for education, subject to the tests outlined in paragraph 1 [the 3 statutory tests set out in 1.3 above]. The use of planning obligations where there is a demonstrable link between the development and its education requirements can provide certainty over the amount and timing of the funding you need to deliver sufficient school places. We recommend that planning obligations allow enough time for developer contributions to be spent (often this is 10 years, or no time limit is specified)”

Regulation 122 test in relation to education contributions required for 21/02832/OUT Lansdown Industrial Estate

The education contribution that is required for this proposed development is based on up to date pupil yield data and the Interim Position Statement is necessary to fund the provision of the additional primary places generated by this development. The proposal is for 215 dwellings of which 161 are qualifying dwellings for education.

This number of qualifying dwellings would be expected to generate an additional demand for 27.27 secondary (age 11-16) places . Gloucestershire County Council is seeking a secondary (age 11-16) contribution of £650,721.75 towards the provision of those places. The secondary age 11-16 contribution will be allocated and spent towards Cheltenham Bournside School and/or Cheltenham Secondary Planning Area

The secondary age 11-16 contribution that is required for this proposed development is directly related to the proposed development in that the contribution has been calculated based on specific formulas relative to the numbers of children generated by this development.

This developer contribution is fairly and reasonably related in scale and kind to the development. The contribution requirement has been calculated using an up to date formula related to pupil yields data and the scale of growth and based only on the numbers of additional pupils arising from the proposed qualified dwellings.

Regulation 122 test in relation to the library contributions required for 21/02832/OUT Lansdown Industrial Estate

The contribution is **necessary** to make the development acceptable in planning terms as it will be used on improvements to existing library provision to mitigate the impact of increasing numbers of library users arising from this development.

The contribution is **directly related to the development** as it is to be used at the library nearest to the application site which is Hesters Way Library and is based on the total number of new dwellings generated by the development (a total of 215 dwellings)

The contribution is **fairly and reasonably related in scale and kind** to the development as it is calculated using GCC's established per dwelling tariff (£196). The calculation for library contributions is £196 multiplied by the total number of proposed dwellings (in this case 215 dwellings x £196 = £42,140).

SECTION 4 – CIL/S106 Funding Position

There are currently no mechanisms or mutually agreed financial arrangements in place between the LPA as CIL Charging Authority and GCC to fund GCC strategic infrastructure from the CIL regime to mitigate the impact of development as it occurs.

The level of CIL charged on a development does not cover the amount of developer contributions that would be required to contribute towards the strategic infrastructure necessary to mitigate the impact of that development.

Housing Enabling Comments- Lansdown Industrial Estate, 21/02832/OUT, 28.11.22

Housing Enabling Comments Summary:

In essence, further clarity is needed regarding the applicants approach to implementing Vacant Building Credit (VBC) on this site before this officer can make more definitive comments. This officer’s mix and commuted sum request has been based on the assumption that the policy compliant affordable housing requirement (40%, 86 units) can be secured on this site (with an element secured as a commuted sum, on the basis of the apartment-heavy layout), as no detailed VBC evidence has been submitted to prove otherwise. Clearly, presuming that affordable housing provision on site can be secured, further detailed plans detailing the location, tenures, sizes, accessibility and occupation levels of the affordable homes must be submitted before any conclusion can be drawn regarding the merits or otherwise of the affordable housing proposals. These plans should be accompanied by a detailed affordable housing statement setting out the rationale for the proposed affordable housing mix. Once further information has been received regarding the applicant’s VBC intentions, this officer will issue revised comments to address any changes to the affordable housing requirement.

Level of Affordable Housing Provision:

The Joint Core Strategy Policy SD12: Affordable Housing states that “on sites of 11 dwellings or more... a minimum of 40% affordable housing will be sought within the Borough of Cheltenham”. This has recently been superseded by the latest National Planning Policy Framework (NPPF), which classifies sites that deliver 10 dwellings or more to be major development with an obligation to deliver affordable housing.

This application will comprise of approximately 215 residential units. Therefore at 40% provision in line with JCS Policy SD12: Affordable Housing the Council will be seeking 86 affordable homes on this scheme.

As captured below, owing to community cohesion concerns and well established difficulties reported by RP’s managing large/mixed tenure blocks of flats, this officer will seek 60% of the overall affordable housing provision (50 dwellings) on-site, with the remaining 40% affordable housing provision (36 dwellings) secured as a commuted sum of **£3,706,529.17** through a Section 106 agreement (or any subsequent replacement) in lieu of on-site affordable housing.

As discussed in further detail below, this officer is aware of the applicant’s intention to implement Vacant Building Credit (hereafter VBC) on this scheme. In the absence of further detailed information as requested by this officer, the impact of VBC upon the provision of affordable housing cannot be established. Moving forwards, if the applicant provides details surrounding their VBC position, this officer will submit revised comments to account for any changes.

Affordable Housing Mix:

Having regard to local needs, affordability and community cohesion, this officer will seek the following mix of on-site affordable dwellings on a policy compliant site:

50- 60% (of total AH provision);	Social Rent	First Homes (30% discount)	Total	%

1b2p Flats, 50m2, M4(2) Cat 2	0	4	4	8%
1b2p House, 50m2	0	2	2	4%
2b4p Flats, 70m2, M4(2) Cat 2	0	10	10	20%
2b4p House, 85m2, M4(2) Cat 2	12	4	16	32%
3b5p House, M4(2) Cat 2, 93m2	8	4	12	24%
3b6p House, 96m2	4	0	4	8%
4b7p House 108m2	2	0	2	4%
Totals:	26	24	50	100%
%	52%	48%	100%	

Vacant Building Credit:

As a starting point for all new development with an affordable housing requirement, a minimum of 40% on-site affordable housing will be sought in Cheltenham Borough in accordance with JCS Policy SD12: Affordable Housing.

Notwithstanding these policy considerations, and considering the context of the scheme proposal, the applicant’s submitted Planning Statement (Dated 14.01.22) notes that: “Vacant Building Credit (VBC) will need to be taken into account and may affect the proportion of affordable housing that can be provided”.

If the applicant applies VBC on this scheme, figures should be provided to enable officers to calculate and validate the required affordable housing provision. These figures should confirm both the existing Gross Internal Area (GIA) of the vacant buildings on-site and the proposed GIA for the submitted development scheme. Whilst the pre-application response gave an indication of VBC approach that could be applied, this needs to be formally confirmed in writing as part of a revised Planning Statement before further comments can be provided by this officer.

Commuted Sum Provision:

Subject to full, policy compliant affordable housing provision being provided by the applicant as required by JCS Policy SD12: Affordable Housing, this officer will seek a commuted sum of **£3,706,529.17** in lieu of 36 on site affordable homes (40% of overall affordable housing provision). The breakdown of the housing mix used to inform this commuted sum can be found below.

36 (40% of total AH provision).	Social Rent	Totals:
1b2p M4(2) Cat 2 Bungalow, 50m2	3	3
1b2p M4(2) Cat 2 Flats, 50m2	12	12
2b4p House, 85m2	10	10
3b5p House, 93m2	6	6
3b6p House, 96m2	4	4
4b7p House, 108m2	1	1
Totals:	36	36
%	100%	100%

Further details regarding the methodology used to calculate this commuted sum requirement can be provided to the applicant upon request. Any disputes regarding the process for calculating commuted sums and/or the final commuted sum requirement will be referred to the Independent Valuer for final determination via an open-book viability assessment, paid for in full by the applicant, to determine the applicable commuted sum requirement.

To justify taking a significant proportion (40%, 36 homes) of the affordable housing provision as a commuted sum, discussions with our RP partners (informed by the experiences of RP's) has indicated that delivering affordable housing in mixed tenure blocks (as seen on the planning layout, which indicates the applicant's intention to deliver 3 x 40~ unit apartment blocks) is not conducive to long-term community cohesion.

Equally, discussions with RP's have clearly shown that the long-term management and maintenance of mixed tenure blocks are disproportionately costly to repair and maintain. On this basis, the Council will seek a commuted sum in lieu of policy compliant on-site affordable housing.

This officer Council would expect that any commuted sum secured should be index-linked and provide the Council with a minimum of 25 years to spend or commit the commuted sum monies (owing to the sizeable value of the proposed commuted sum). The exact requirements of any commuted sum will be captured within a S.106 obligation to provide the Council with legal reassurance about the delivery of any monies owed.

Spending Commuted Sums:

This officer will seek the following wording within a Section 106 agreement to provide the Council with reasonable flexibility to spend or commit any agreed commuted sums to support the holistic improvement of affordable housing/other housing related matters within the local authority area, as captured below:

The Council covenants with the owner to use the affordable housing contribution (i.e. affordable housing commuted sum)

"Towards the refurbishment or development of affordable housing stock, purchase of land and/or dwellings or any such housing related services as the Council (acting reasonably) may wish within the Council's administrative area".

Viability:

JCS Policy SD12 states that where the viability of development impacts upon delivery of the full (i.e. 40% on-site affordable housing) requirement, developers should consider:

- Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan... and the objective of creating a balanced housing market.
- Securing public subsidy or other commuted sums to assist delivery of affordable housing.

If a development cannot deliver the full affordable housing requirement, a viability assessment conforming to an agreed methodology, in accordance with Policy INF7 will be required. Viability assessments will be independently appraised at the expense of the applicant. It is expected that any such assessment will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances.

The council considers that information submitted as a part of, and in support of a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should be aware that this will be made publicly available. Further clarification around the viability process that Cheltenham Borough Council will follow in exceptional circumstances can be found in JCS Policy SD12.

In exceptional circumstances, where it is agreed that it is not possible to deliver 40% affordable housing on site due to viability issues, the council will build a viability review mechanism into the Section 106 agreement. This would likely take place within 2 years of the date of the last viability review.

Dwelling Mix and Tenure:

Our adopted policy JCS Policy SD11: Housing Mix and Standards states that: - "Housing development will be required to provide an appropriate mix of dwelling sizes types and tenures in order to contribute to mixed and balanced communities", before continuing to require that new development should: "address the needs of the local area...as set out in the local housing evidence base, including the most up-to-date SHMA".

In normal circumstances, the Council would seek full policy compliant affordable housing provision (86 units, 40% affordable housing) on this site in accordance with JCS Policy SD12: Affordable Housing.¹ However, upon reviewing the applicant's proposed planning layout (which includes 3 x large apartment blocks, totalling 126 dwellings, and comprised of 42~ dwellings per block), this officers' preferred approach will be to deliver a proportion of the affordable housing on-site, with the remaining affordable housing contribution secured via a commuted sum payment in lieu of on-site delivery.² More specifically, the Council will seek the delivery of 40% of the proposed affordable housing requirement (i.e. 36 dwellings) on-site, with the remaining 60% (equalling 50 affordable homes) being delivered through a commuted sum in lieu of on-site affordable housing. This approach is consistent with creating mixed and balanced communities as per the NPPF.

The Councils' proposed on-site affordable housing provision seeks to deliver a mix of Social Rented and First Homes (with First Homes comprising 25% of total S.106 affordable housing delivery).

¹ Subject to further details being provided surrounding the applicant's approach to implementing Vacant Building Credit on this site.

² The applicant's proposed planning layout can be found on page 48 of the Design & Access Statement, dated 14.01.2022.

This approach has been informed by numerous discussions with RP partners, who have overwhelmingly indicated that the management and community cohesion of mixed tenure blocks (i.e. apartment blocks that include both affordable and market homes within the same block) would prove both difficult and resource-intensive.

Rents:

The Council's adopted policy position, found within JCS Policy SD11: Housing Mix and Standards, states that new developments must: "address the needs of the local area... as set out in the local housing evidence base including the most up-to-date SHMA". Additionally, JCS Policy SD12: Affordable Housing states that "provision should be made... to ensure that housing will remain at an affordable price for future eligible households".

In specific terms, the 2020 Gloucestershire LHNA identifies that a minimum of 1,325 social rented homes are required between 2021-2041 to meet Cheltenham's affordable housing needs. By comparison, only 186 affordable rented homes are required between 2021-2041. Given the significant identified need for social rented homes, this officer is seeking to deliver the on-site rented contingent at social rented levels.

It is also notable that Homes England has also designated Cheltenham Borough as an area of high affordability pressure, meaning that the difference between the average social rents and private rents is £50 per week or more, further underlining the importance of delivering social rented homes to address acute affordability issues within the Borough. The ongoing cost of living crisis, which (following on the heels of the COVID-19 pandemic) has left a significant number of affordable housing tenants without protection against rising energy and living costs. Clearly, setting rents at the most affordable level possible will help to mitigate vulnerable tenants from these unprecedented cost-pressures. Further details regarding the impact that the cost of living crisis is having upon affordable tenants can be found [here](#):

The delivery and rent-setting of Social Rented homes should comply with the Government's April [February 2019 Policy statement on rents for social housing](#), in addition to the [Government's April 2020 Rent Standard, as updated from time-to-time](#).

First Homes:

In line with the First Homes Planning Practice Guidance, the Council is seeking to deliver policy compliant First Homes provision (25% of Section 106), with the entirety of this provision (24 x First Homes) being delivered on-site to give Cheltenham's residents the best opportunity to secure a new First Home.

First Homes in Cheltenham Borough will be sold at a minimum 30% discount, as per national Government policy. Additionally, eligible households (who must be first-time buyers earning less than £80,000 per household) will need a local connection to the Cheltenham Borough administrative area (as specified by [Homeseeker Plus](#)) in order to secure new First Homes.

First Homes should comply with the Council's clustering requirements, as specified within JCS Policy SD12: Affordable Housing, namely that affordable housing (of all tenures) should be evenly distributed across and throughout the development scheme.

Further details regarding how the Council intends to implement the delivery of new First Homes in Cheltenham Borough will be released by the Council in the form of a First Homes SPD in due course.

Accessible and Adaptable Homes:

Service Charges:

Any service charges on the affordable dwellings should be eligible for and fully covered by Housing Benefit.

The Council recognises that, social rented charges are set through the national rent regime, with rents being exclusive of any service charges.

It is crucial, therefore, that service charges should be kept to a minimum. This can be achieved through the scheme design, and we would be happy to refer you to Registered Provider partners for further input if necessary.

Clustering and Distribution:

JCS Policy SD12: Affordable Housing clarifies that new development should ensure that affordable housing is “seamlessly integrated and distributed throughout the development scheme”. The submitted plans, namely the Illustrative Masterplan, (dated 14/01/2022) does not distinguish the affordable homes on the plan.

Moving forwards, this officer will require a detailed affordable housing plan to be submitted by the applicant, which, for ease of reference, should:

- Clearly identify the affordable housing contingent within a Planning Layout and/or a separate Affordable Housing Plan (preferably in a different colour to the market units) as well as indicating the location of the affordable homes in relation to the market homes.
- Provide a detailed affordable housing schedule within the Planning Layout/Affordable Housing Plan which clearly specifies the affordable house types (i.e. 2 bedroom house), affordable housing tenures (First Homes, Social Rent etc), sizes (95m², occupancy levels (i.e. 3 bed 6 person) and accessibility standards (either M4(2) Category 2 or M4(3)(2)(b) for the proposed affordable housing).

To be clear, the details specified above should also be explicitly addressed within a separate supporting Affordable Housing Statement, which will outline the applicant’s justification and evidence supporting the proposed affordable housing mix.

Visual Appearance:

As of writing, no detailed external visual plans for the affordable housing units have been provided by the applicant on this scheme. This officer formally request that the applicant provides clearly identified external and internal plans and drawings for the affordable and market homes, to allow this officer to determine whether the proposed scheme is policy compliant in accordance with JCS Policy SD12: Affordable Housing.

Affordable Housing Standards/Occupancy Rates:

JCS Policy SD4: Design Requirements outlines that new development should be designed to be adaptable to changing economic, social and environmental requirements, including ensuring that new buildings are ‘fit for purpose’. Additionally, JCS Policy SD11: Housing Mix and Standards sets out that new housing should meet, and where possible exceed appropriate minimum space standards.

As the applicant has not confirmed the nature of the proposals regarding affordable housing on this scheme (beyond stating that vacant building credit will be explored) this officer cannot comment on whether this scheme is policy compliant in line with JCS Policy SD11 and JCS Policy SD4.

Provision of Accessible and Adaptable Homes:

JCS Policy SD11: Housing Mix and Standards states that: “housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies, including Policy SD8”. Additionally, JCS Policy SD11 requires that development should address the needs of the local area... as set out in the local housing evidence base including the most up to date SHMA”.

The 2020 Gloucestershire LHNA identifies that Cheltenham Borough requires 7,215 new M4(2) Category 2 homes for both market and affordable tenures by 2041 to meet housing needs. Moreover, 213 M4(3) new Wheelchair Accessible affordable homes are required between 2021- 2041 to meet housing needs of those households with disabilities.

Examining our Housing Register, 18 households are currently in need of a wheelchair accessible home, compared to 289 households in need of a level access affordable home.

The applicant is yet to provide any clarity regarding the affordable housing proposals, and, as such, this officer cannot comment further regarding the provision of accessible and adaptable homes without first receiving confirmation of the proposed affordable housing mix from the applicant.

Parking:

In terms of parking arrangements, this officer’s preference, (which has been informed by our registered provider partners’ experience) is to avoid bay parking and large car parking areas, which have the potential to become hotspots for anti-social behaviour. More specifically, this officer would seek for equivalent parking arrangements to be provided for the affordable homes compared to their market counterparts.

Section 106 Agreement:

The Council will expect the owner to enter into a Section 106 agreement to deliver the affordable homes, using the Council’s latest Precedent S.106 agreement as a template. This agreement will specify the affordable housing schedule, affordable housing plan, requirement to transfer the affordable homes to a Registered Provider amongst other matters.

Additionally, in order to secure any agreed commuted sum monies in perpetuity, the Council will require the applicant to enter into a Section 106 agreement, using the Council’s precedent S.106 agreement as a template. This S.106 agreement will clearly stipulate the following points:

- Commuted Sum amount (in £)
- How the Council intends to spend any commuted sum monies provided
- Timelines for spending or committing the commuted sum monies
- Required payment schedules to ensure that commuted sums are received by the Council in a timely manner (prior to first occupation).
- Reasonable monitoring fees

- Clauses to enable a viability appraisal (provided that development does not commence development within 18 months following the determination of a planning permission).

Nominations Agreement:

All on-site affordable housing (with the exception of First Homes) should be provided by a Registered Provider (RP) who will be expected to enter into a nominations agreement with the Local Authority, providing the Council with 100% nominations on first lettings on the rented housing and 75% nominations upon all subsequent rented affordable housing lettings thereafter, (save for any units built to M4(2) or M4(3) accessible standards where the Council shall at all times be entitled to nominate the Eligible Person for one hundred percent (100%) of these units), unless otherwise agreed in writing between the Council and the Affordable Housing Provider. This will assist the Council in meeting its statutory housing duties under the Housing and Homelessness legislation.

Ewan Wright

Housing Strategy and Enabling Officer

28th November 2022

Housing Enabling Comments- Lansdown Industrial Estate, 21/02832/OUT, 01.12.22

Housing Enabling Comments Summary:

In essence, further clarity is needed regarding the applicants approach to implementing Vacant Building Credit (VBC) on this site before this officer can make more definitive comments. This officer’s mix and commuted sum request has been based on the assumption that the policy compliant affordable housing requirement (40%, 86 units) can be secured on this site (with an element secured as a commuted sum, on the basis of the apartment-heavy layout), as no detailed VBC evidence has been submitted to prove otherwise. Clearly, presuming that affordable housing provision on site can be secured, further detailed plans detailing the location, tenures, sizes, accessibility and occupation levels of the affordable homes must be submitted before any conclusion can be drawn regarding the merits or otherwise of the affordable housing proposals. These plans should be accompanied by a detailed affordable housing statement setting out the rationale for the proposed affordable housing mix. Once further information has been received regarding the applicant’s VBC intentions, this officer will issue revised comments to address any changes to the affordable housing requirement.

Level of Affordable Housing Provision:

The Joint Core Strategy Policy SD12: Affordable Housing states that “on sites of 11 dwellings or more... a minimum of 40% affordable housing will be sought within the Borough of Cheltenham”. This has recently been superseded by the latest National Planning Policy Framework (NPPF), which classifies sites that deliver 10 dwellings or more to be major development with an obligation to deliver affordable housing.

This application will comprise of approximately 215 residential units. Therefore at 40% provision in line with JCS Policy SD12: Affordable Housing the Council will be seeking 86 affordable homes on this scheme.

As captured below, owing to community cohesion concerns and well established difficulties reported by RP’s managing large/mixed tenure blocks of flats, this officer will seek 60% of the overall affordable housing provision (50 dwellings) on-site, with the remaining 40% affordable housing provision (36 dwellings) secured as a commuted sum of **£3,706,529.17** through a Section 106 agreement (or any subsequent replacement) in lieu of on-site affordable housing.

As discussed in further detail below, this officer is aware of the applicant’s intention to implement Vacant Building Credit (hereafter VBC) on this scheme. In the absence of further detailed information as requested by this officer, the impact of VBC upon the provision of affordable housing cannot be established. Moving forwards, if the applicant provides details surrounding their VBC position, this officer will submit revised comments to account for any changes.

Affordable Housing Mix:

Having regard to local needs, affordability and community cohesion, this officer will seek the following mix of on-site affordable dwellings on a policy compliant site:

50- 60% (of total AH provision);	Social Rent	First Homes (30% discount)	Total	%

1b2p Flats, 50m2, M4(2) Cat 2	0	4	4	8%
1b2p House, 50m2	0	2	2	4%
2b4p Flats, 70m2, M4(2) Cat 2	0	10	10	20%
2b4p House, 85m2, M4(2) Cat 2	12	4	16	32%
3b5p House, M4(2) Cat 2, 93m2	8	4	12	24%
3b6p House, 96m2	4	0	4	8%
4b7p House 108m2	2	0	2	4%
Totals:	26	24	50	100%
%	52%	48%	100%	

Vacant Building Credit:

As a starting point for all new development with an affordable housing requirement, a minimum of 40% on-site affordable housing will be sought in Cheltenham Borough in accordance with JCS Policy SD12: Affordable Housing.

Notwithstanding these policy considerations, and considering the context of the scheme proposal, the applicant's submitted Planning Statement (Dated 14.01.22) notes that: "Vacant Building Credit (VBC) will need to be taken into account and may affect the proportion of affordable housing that can be provided".

If the applicant applies VBC on this scheme, figures should be provided to enable officers to calculate and validate the required affordable housing provision. These figures should confirm both the existing Gross Internal Area (GIA) of the vacant buildings on-site and the proposed GIA for the submitted development scheme. Whilst the pre-application response gave an indication of VBC approach that could be applied, this needs to be formally confirmed in writing as part of a revised Planning Statement before further comments can be provided by this officer.

Commuted Sum Provision:

Subject to full, policy compliant affordable housing provision being provided by the applicant as required by JCS Policy SD12: Affordable Housing, this officer will seek a commuted sum of **£3,706,529.17** in lieu of 36 on site affordable homes (40% of overall affordable housing provision). The breakdown of the housing mix used to inform this commuted sum can be found below.

36 (40% of total AH provision).	Social Rent	Totals:
1b2p M4(2) Cat 2 Bungalow, 50m2	3	3
1b2p M4(2) Cat 2 Flats, 50m2	12	12
2b4p House, 85m2	10	10
3b5p House, 93m2	6	6
3b6p House, 96m2	4	4
4b7p House, 108m2	1	1
Totals:	36	36
%	100%	100%

Further details regarding the methodology used to calculate this commuted sum requirement can be provided to the applicant upon request. Any disputes regarding the process for calculating commuted sums and/or the final commuted sum requirement will be referred to the Independent Valuer for final determination via an open-book viability assessment, paid for in full by the applicant, to determine the applicable commuted sum requirement.

To justify taking a significant proportion (40%, 36 homes) of the affordable housing provision as a commuted sum, discussions with our RP partners (informed by the experiences of RP's) has indicated that delivering affordable housing in mixed tenure blocks (as seen on the planning layout, which indicates the applicant's intention to deliver 3 x 40~ unit apartment blocks) is not conducive to long-term community cohesion.

Equally, discussions with RP's have clearly shown that the long-term management and maintenance of mixed tenure blocks are disproportionately costly to repair and maintain. On this basis, the Council will seek a commuted sum in lieu of policy compliant on-site affordable housing.

This officer Council would expect that any commuted sum secured should be index-linked and provide the Council with a minimum of 25 years to spend or commit the commuted sum monies (owing to the sizeable value of the proposed commuted sum). The exact requirements of any commuted sum will be captured within a S.106 obligation to provide the Council with legal reassurance about the delivery of any monies owed.

Spending Commuted Sums:

This officer will seek the following wording within a Section 106 agreement to provide the Council with reasonable flexibility to spend or commit any agreed commuted sums to support the holistic improvement of affordable housing/other housing related matters within the local authority area, as captured below:

The Council covenants with the owner to use the affordable housing contribution (i.e. affordable housing commuted sum)

"Towards the refurbishment or development of affordable housing stock, purchase of land and/or dwellings or any such housing related services as the Council (acting reasonably) may wish within the Council's administrative area".

Viability:

JCS Policy SD12 states that where the viability of development impacts upon delivery of the full (i.e. 40% on-site affordable housing) requirement, developers should consider:

- Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan... and the objective of creating a balanced housing market.
- Securing public subsidy or other commuted sums to assist delivery of affordable housing.

If a development cannot deliver the full affordable housing requirement, a viability assessment conforming to an agreed methodology, in accordance with Policy INF7 will be required. Viability assessments will be independently appraised at the expense of the applicant. It is expected that any such assessment will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances.

The council considers that information submitted as a part of, and in support of a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should be aware that this will be made publicly available. Further clarification around the viability process that Cheltenham Borough Council will follow in exceptional circumstances can be found in JCS Policy SD12.

In exceptional circumstances, where it is agreed that it is not possible to deliver 40% affordable housing on site due to viability issues, the council will build a viability review mechanism into the Section 106 agreement. This would likely take place within 2 years of the date of the last viability review.

Dwelling Mix and Tenure:

Our adopted policy JCS Policy SD11: Housing Mix and Standards states that: - "Housing development will be required to provide an appropriate mix of dwelling sizes types and tenures in order to contribute to mixed and balanced communities", before continuing to require that new development should: "address the needs of the local area...as set out in the local housing evidence base, including the most up-to-date SHMA".

In normal circumstances, the Council would seek full policy compliant affordable housing provision (86 units, 40% affordable housing) on this site in accordance with JCS Policy SD12: Affordable Housing.¹ However, upon reviewing the applicant's proposed planning layout (which includes 3 x large apartment blocks, totalling 126 dwellings, and comprised of 42~ dwellings per block), this officers' preferred approach will be to deliver a proportion of the affordable housing on-site, with the remaining affordable housing contribution secured via a commuted sum payment in lieu of on-site delivery.² More specifically, the Council will seek the delivery of 60% of the proposed affordable housing requirement (i.e. 50 dwellings) on-site, with the remaining 40% (equalling 36 affordable homes) being delivered through a commuted sum in lieu of on-site affordable housing. This approach is consistent with creating mixed and balanced communities as per the NPPF.

The Councils' proposed on-site affordable housing provision seeks to deliver a mix of Social Rented and First Homes (with First Homes comprising 25% of total S.106 affordable housing delivery).

¹ Subject to further details being provided surrounding the applicant's approach to implementing Vacant Building Credit on this site.

² The applicant's proposed planning layout can be found on page 48 of the Design & Access Statement, dated 14.01.2022.

This approach has been informed by numerous discussions with RP partners, who have overwhelmingly indicated that the management and community cohesion of mixed tenure blocks (i.e. apartment blocks that include both affordable and market homes within the same block) would prove both difficult and resource-intensive.

Rents:

The Council's adopted policy position, found within JCS Policy SD11: Housing Mix and Standards, states that new developments must: "address the needs of the local area... as set out in the local housing evidence base including the most up-to-date SHMA". Additionally, JCS Policy SD12: Affordable Housing states that "provision should be made... to ensure that housing will remain at an affordable price for future eligible households".

In specific terms, the 2020 Gloucestershire LHNA identifies that a minimum of 1,325 social rented homes are required between 2021-2041 to meet Cheltenham's affordable housing needs. By comparison, only 186 affordable rented homes are required between 2021-2041. Given the significant identified need for social rented homes, this officer is seeking to deliver the on-site rented contingent at social rented levels.

It is also notable that Homes England has also designated Cheltenham Borough as an area of high affordability pressure, meaning that the difference between the average social rents and private rents is £50 per week or more, further underlining the importance of delivering social rented homes to address acute affordability issues within the Borough. The ongoing cost of living crisis, which (following on the heels of the COVID-19 pandemic) has left a significant number of affordable housing tenants without protection against rising energy and living costs. Clearly, setting rents at the most affordable level possible will help to mitigate vulnerable tenants from these unprecedented cost-pressures. Further details regarding the impact that the cost of living crisis is having upon affordable tenants can be found [here](#):

The delivery and rent-setting of Social Rented homes should comply with the Government's April [February 2019 Policy statement on rents for social housing](#), in addition to the [Government's April 2020 Rent Standard, as updated from time-to-time](#).

First Homes:

In line with the First Homes Planning Practice Guidance, the Council is seeking to deliver policy compliant First Homes provision (25% of Section 106), with the entirety of this provision (24 x First Homes) being delivered on-site to give Cheltenham's residents the best opportunity to secure a new First Home.

First Homes in Cheltenham Borough will be sold at a minimum 30% discount, as per national Government policy. Additionally, eligible households (who must be first-time buyers earning less than £80,000 per household) will need a local connection to the Cheltenham Borough administrative area (as specified by [Homeseeker Plus](#)) in order to secure new First Homes.

First Homes should comply with the Council's clustering requirements, as specified within JCS Policy SD12: Affordable Housing, namely that affordable housing (of all tenures) should be evenly distributed across and throughout the development scheme.

Further details regarding how the Council intends to implement the delivery of new First Homes in Cheltenham Borough will be released by the Council in the form of a First Homes SPD in due course.

Accessible and Adaptable Homes:

Service Charges:

Any service charges on the affordable dwellings should be eligible for and fully covered by Housing Benefit.

The Council recognises that, social rented charges are set through the national rent regime, with rents being exclusive of any service charges.

It is crucial, therefore, that service charges should be kept to a minimum. This can be achieved through the scheme design, and we would be happy to refer you to Registered Provider partners for further input if necessary.

Clustering and Distribution:

JCS Policy SD12: Affordable Housing clarifies that new development should ensure that affordable housing is “seamlessly integrated and distributed throughout the development scheme”. The submitted plans, namely the Illustrative Masterplan, (dated 14/01/2022) does not distinguish the affordable homes on the plan.

Moving forwards, this officer will require a detailed affordable housing plan to be submitted by the applicant, which, for ease of reference, should:

- Clearly identify the affordable housing contingent within a Planning Layout and/or a separate Affordable Housing Plan (preferably in a different colour to the market units) as well as indicating the location of the affordable homes in relation to the market homes.
- Provide a detailed affordable housing schedule within the Planning Layout/Affordable Housing Plan which clearly specifies the affordable house types (i.e. 2 bedroom house), affordable housing tenures (First Homes, Social Rent etc), sizes (95m², occupancy levels (i.e. 3 bed 6 person) and accessibility standards (either M4(2) Category 2 or M4(3)(2)(b) for the proposed affordable housing).

To be clear, the details specified above should also be explicitly addressed within a separate supporting Affordable Housing Statement, which will outline the applicant’s justification and evidence supporting the proposed affordable housing mix.

Visual Appearance:

As of writing, no detailed external visual plans for the affordable housing units have been provided by the applicant on this scheme. This officer formally request that the applicant provides clearly identified external and internal plans and drawings for the affordable and market homes, to allow this officer to determine whether the proposed scheme is policy compliant in accordance with JCS Policy SD12: Affordable Housing.

Affordable Housing Standards/Occupancy Rates:

JCS Policy SD4: Design Requirements outlines that new development should be designed to be adaptable to changing economic, social and environmental requirements, including ensuring that new buildings are ‘fit for purpose’. Additionally, JCS Policy SD11: Housing Mix and Standards sets out that new housing should meet, and where possible exceed appropriate minimum space standards.

As the applicant has not confirmed the nature of the proposals regarding affordable housing on this scheme (beyond stating that vacant building credit will be explored) this officer cannot comment on whether this scheme is policy compliant in line with JCS Policy SD11 and JCS Policy SD4.

Provision of Accessible and Adaptable Homes:

JCS Policy SD11: Housing Mix and Standards states that: “housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies, including Policy SD8”. Additionally, JCS Policy SD11 requires that development should address the needs of the local area... as set out in the local housing evidence base including the most up to date SHMA”.

The 2020 Gloucestershire LHNA identifies that Cheltenham Borough requires 7,215 new M4(2) Category 2 homes for both market and affordable tenures by 2041 to meet housing needs. Moreover, 213 M4(3) new Wheelchair Accessible affordable homes are required between 2021- 2041 to meet housing needs of those households with disabilities.

Examining our Housing Register, 18 households are currently in need of a wheelchair accessible home, compared to 289 households in need of a level access affordable home.

The applicant is yet to provide any clarity regarding the affordable housing proposals, and, as such, this officer cannot comment further regarding the provision of accessible and adaptable homes without first receiving confirmation of the proposed affordable housing mix from the applicant.

Parking:

In terms of parking arrangements, this officer’s preference, (which has been informed by our registered provider partners’ experience) is to avoid bay parking and large car parking areas, which have the potential to become hotspots for anti-social behaviour. More specifically, this officer would seek for equivalent parking arrangements to be provided for the affordable homes compared to their market counterparts.

Section 106 Agreement:

The Council will expect the owner to enter into a Section 106 agreement to deliver the affordable homes, using the Council’s latest Precedent S.106 agreement as a template. This agreement will specify the affordable housing schedule, affordable housing plan, requirement to transfer the affordable homes to a Registered Provider amongst other matters.

Additionally, in order to secure any agreed commuted sum monies in perpetuity, the Council will require the applicant to enter into a Section 106 agreement, using the Council’s precedent S.106 agreement as a template. This S.106 agreement will clearly stipulate the following points:

- Commuted Sum amount (in £)
- How the Council intends to spend any commuted sum monies provided
- Timelines for spending or committing the commuted sum monies
- Required payment schedules to ensure that commuted sums are received by the Council in a timely manner (prior to first occupation).
- Reasonable monitoring fees

- Clauses to enable a viability appraisal (provided that development does not commence development within 18 months following the determination of a planning permission).

Nominations Agreement:

All on-site affordable housing (with the exception of First Homes) should be provided by a Registered Provider (RP) who will be expected to enter into a nominations agreement with the Local Authority, providing the Council with 100% nominations on first lettings on the rented housing and 75% nominations upon all subsequent rented affordable housing lettings thereafter, (save for any units built to M4(2) or M4(3) accessible standards where the Council shall at all times be entitled to nominate the Eligible Person for one hundred percent (100%) of these units), unless otherwise agreed in writing between the Council and the Affordable Housing Provider. This will assist the Council in meeting its statutory housing duties under the Housing and Homelessness legislation.

Ewan Wright

Housing Strategy and Enabling Officer

1st December 2022

The advice contained in this response is provided by officers of the County Council acting only in its capacity as the Minerals and Waste Planning Authority for Gloucestershire. Further notifications to Gloucestershire County Council in respect of its other regulatory responsibilities may still be necessary.

GCC M&W Reference:	PR2022/0013/1/DPAP	Planning Application Reference:	21/02832/OUT	Linked Application Reference(s) (if relevant):	
Application Site Address:	Lansdown Industrial Estate, Gloucester Rd, Cheltenham				
GCC M&W Responding Officer:	Lindsay Wood	Date of GCC M&W Response:	27/01/2022	Determining Authority:	Cheltenham Borough
Determining Case Officer:	Lucy White	Proposed Development Type:	Housing	Type of Application:	Outline application

Assessment of waste minimisation matters | compliance with adopted Gloucestershire Waste Core Strategy Core Policy WCS2

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

'X' in a box represents the officer-level response given at this time

For applications to discharge a condition(s):

The submitted information is sufficient to recommend the approval of details for discharging the planning condition(s) relating to waste minimisation. NO FURTHER ACTION IS RECOMMENDED AT THIS TIME	Page 227
The submitted information is insufficient to recommend the approval of details for discharging the planning condition(s) relating to waste minimisation. IT IS RECCOMENDED THAT FURTHER INFORMATION IS SOUGHT BEFORE APPROVING WASTE MINIMSATION CONDITION DETAILS – see 'other officer-level observations' below for more details	

For all other types of applications:

The application has demonstrated sufficient consideration has been given to waste minimisation matters including measures to achieve effective implementation with the development. NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME	<input type="checkbox"/>
The application has demonstrated waste minimisation matters have been considered. However, further details to achieve effective implementation with the development will be necessary. NO OBJECTION SUBJECT TO THE USE OF RECOMMENDED CONDITIONS (SEE OVER PAGE FOR MORE DETAILS)	<input checked="" type="checkbox"/>
The application has demonstrated some waste minimisation matters have been considered. However, specific details relating to 'build' phase have not been provided. FURTHER INFORMATION IS RECOMMENDED RELATING TO WASTE MINIMISATION AND THE DEVELOPMENT'S 'BUILD' PHASE – see advice GCC Waste Minimisation SPD	<input type="checkbox"/>

CONTINUED OVER PAGE >>

IF YOU HAVE ANY QUERIES REGARDING THIS CONSULTATION RESPONSE PROVIDED BY THE MINERAL & WASTE PLANNING AUTHORITY PLEASE CONTACT:
m-wplans@gloucestershire.gov.uk A MEMBER OF THE TEAM WILL GET BACK TO YOU AS SOON AS THEY ARE AVAILABLE TO DO SO.

The application has demonstrated some waste minimisation matters have been considered. However, specific details relating to the occupation phase has not been provided.
FURTHER INFORMATION IS RECOMMENDED RELATING TO WASTE MINIMISATION AND THE DEVELOPMENT'S OCCUPATION PHASE – see advice | [GCC Waste Minimisation SPD](#)



The application has not demonstrated that waste minimisation matters have been considered.

IT IS STRONGLY RECOMMENDED THAT A WASTE MINIMISATION STATEMENT IS REQUESTED PRIOR TO DETERMINATION– see local advice | [GCC Waste Minimisation SPD](#)



Recommended planning conditions:

Standard condition for waste minimisation during site preparation, design and construction



CONDITION –

No below or above ground development shall commence until a detailed site waste management plan or equivalent has been submitted to and approved in writing by the local planning authority. The detailed site waste management plan must identify: - the specific types and amount of waste materials forecast to be generated from the development during site preparation & demolition and construction phases; and the specific measures will be employed for dealing with this material so as to: - minimise its creation, maximise the amount of re-use and recycling on-site; maximise the amount of off-site recycling of any wastes that are unusable on-site; and reduce the overall amount of waste sent to landfill. In addition, the detailed site waste management plan must also set out the proposed proportions of recycled content that will be used in construction materials. The detailed site waste management plan shall be fully implemented as approved unless the local planning authority gives prior written permission for any variation.

REASON –

To ensure the effective implementation of waste minimisation and resource efficiency measures in accordance with adopted Gloucestershire Waste Core Strategy: Core Policy WCS2 – Waste Reduction and adopted Minerals Local Plan for Gloucestershire Policy SR01.

Standard condition for waste minimisation during occupation



CONDITION –

No above-ground development shall commence until full details of the provision made for facilitating the management and recycling of waste generated during occupation have been submitted to and approved in writing by the local planning authority. This must include details of the appropriate and adequate space and infrastructure to allow for the separate storage of recyclable waste materials. The management of waste during occupation must be aligned with the principles of the waste hierarchy and not prejudice the local collection authority's ability to meet its waste management targets. All details shall be fully implemented as approved unless the local planning authority gives prior written permission for any variation.

REASON –

To ensure the effective implementation of waste minimisation and resource efficiency measures in accordance with adopted Gloucestershire Waste Core Strategy: Core Policy WCS2 – Waste Reduction

CONTINUED OVER PAGE >>

IF YOU HAVE ANY QUERIES REGARDING THIS CONSULTATION RESPONSE PROVIDED BY THE MINERAL & WASTE PLANNING AUTHORITY PLEASE CONTACT:
m-wplans@gloucestershire.gov.uk A MEMBER OF THE TEAM WILL GET BACK TO YOU AS SOON AS THEY ARE AVAILABLE TO DO SO.

Assessment of resource efficiency in construction matters | compliance with adopted Minerals Local Plan for Gloucestershire Policy SR01

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

'X' in a box represents the officer-level response given at this time

The application has demonstrated that consideration has been given to the use of secondary and / or recycled aggregate in the proposed development's design and construction NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME	X
The application has not demonstrated that consideration has been given to alternative secondary and / or recycled aggregate use in the proposed development's construction STRONGLY RECOMMENDED THAT FURTHER SUPPORTING INFORMATION IS PROVIDED PRIOR TO DETERMINATION – see advice pages 32 and 33 of the Minerals Local Plan for Glos.	

Assessment of waste management infrastructure safeguarding | compliance with adopted Gloucestershire Waste Core Strategy Core Policy WCS 11

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

'X' in a box represents the officer-level response given at this time

The application site is not within close proximity to / or contain existing safeguarded waste management infrastructure and / or land allocated for this purpose NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME	X
Waste management infrastructure safeguarding is a local policy matter that requires consideration with this application. There is a risk of incompatible and conflicting land uses. The named permitted and / or allocated waste management facility is within close proximity or is contained within the application site. The waste management land use is safeguarded under the local development plan policy WCS 11	NAMED LOCATION / FACILITY:
The application has demonstrated that the risk of land use incompatibility and conflict is sufficiently low that the matter is materially insignificant to the proposed development NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME	
The application has not sufficiently considered the risk of land use incompatibility and conflict or demonstrated that the matter is not materially significant to the proposed development HOLDING OBJECTION – IT IS RECOMMENDED SPECIFIC ADVICE IS SOUGHT FROM ENVIRONMENTAL HEALTH PROFESSIONALS ABOUT THE NEED FOR / AND ACHIEVEABILITY OF ANY MITIGATION	

CONTINUED OVER PAGE >>

IF YOU HAVE ANY QUERIES REGARDING THIS CONSULTATION RESPONSE PROVIDED BY THE MINERAL & WASTE PLANNING AUTHORITY PLEASE CONTACT:
m-wplans@gloucestershire.gov.uk A MEMBER OF THE TEAM WILL GET BACK TO YOU AS SOON AS THEY ARE AVAILABLE TO DO SO.

Assessment of mineral infrastructure safeguarding | compliance with adopted Minerals Local Plan for Gloucestershire Policy MS02

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

'X' in a box represents the officer-level response given at this time

The application site does not adjoin or contain within it existing safeguarded mineral infrastructure
NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME

Mineral infrastructure safeguarding is a local policy matter that requires consideration with this application. There is a risk of incompatible and conflicting land uses. The named permitted mineral infrastructure facility is located within or adjoining the application site. The mineral infrastructure land use is safeguarded under the local development plan policy MS02
NAMED LOCATION / FACILITY:

The application has demonstrated that the risk of land use incompatibility and conflict is sufficiently low that the matter is not materially significant to the proposed development
NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME

The application has not sufficiently considered the risk of land use incompatibility and conflict or demonstrated that the matter is not materially significant to the proposed development
HOLDING OBJECTION – IT IS RECOMMENDED SPECIFIC ADVICE IS SOUGHT FROM ENVIRONMENTAL HEALTH PROFESSIONALS ABOUT THE NEED FOR AND ACHIEVABILITY OF ANY MITIGATION

Assessment of mineral resource safeguarding | compliance with adopted Minerals Local Plan for Gloucestershire Policy MS01

Page 230

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

'X' in a box represents the officer-level response given at this time

The application site is not located within a local Mineral Safeguarding Area (MSA) or is exempt from safeguarding requirements as set out under Table 2 of the Minerals Local Plan for Glos.
NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME

Mineral resource safeguarding is a local planning policy matter that requires consideration with this application. There is a risk of needless mineral sterilisation by proposed surface development. The named mineral resources are of potential economic importance and are safeguarded under the local development plan policy MS01
NAMED MINERAL RESOURCES:

The application is supported by a Mineral Resource Assessment or other sufficient evidence that shows needless mineral sterilisation will not occur with the proposed development
NO OBJECTION RAISED and NO FURTHER ACTION IS RECOMMENDED AT THIS TIME

The application has not considered or has not fully assessed the potential risk of needless mineral sterilisation with the proposed development
IT IS STRONGLY RECOMMENDED THAT A FULL MINERAL RESOURCE ASSESSMENT IS REQUESTED PRIOR TO DETERMINATION– see advice | pages 39 and 40 of the Minerals Local Plan for Glos.

CONTINUED OVER PAGE >>

IF YOU HAVE ANY QUERIES REGARDING THIS CONSULTATION RESPONSE PROVIDED BY THE MINERAL & WASTE PLANNING AUTHORITY PLEASE CONTACT: m-wplans@gloucestershire.gov.uk A MEMBER OF THE TEAM WILL GET BACK TO YOU AS SOON AS THEY ARE AVAILABLE TO DO SO.

MATTERS FOR THE CASE OFFICER and APPLICANT TO CONSIDER: -

...any other matters that M&W policy officers consider relevant to provide advise on at this time.

Officers strongly encourage the case officer to highlight the following advice to the applicant should it be decided that the outline application is to recommended for approval. At the detailed reserve matters stage, the applicant should give careful consideration and provide sufficiently detailed evidence of: -

- How consideration will be given to the use of construction materials that incorporate recycled materials, including the use of secondary and / or recycled aggregate as an alternative to conventional primary aggregates;
- The tonnages of waste associated with the site preparation (including demolition) and construction of the development; and
- How effective and efficient waste management will be achieved at the occupation stage.

This page is intentionally left blank

APPLICATION NO: 21/02832/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 15th January 2022	DATE OF EXPIRY : 16th April 2022
WARD: St Marks	PARISH:
APPLICANT:	Chester West & Chester Borough Council
LOCATION:	Lansdown Industrial Estate Gloucester Road Cheltenham
PROPOSAL:	Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.

REPRESENTATIONS

Number of contributors	54
Number of objections	49
Number of representations	3
Number of supporting	2

23 Brookway Drive
 Charlton Kings
 Cheltenham
 Gloucestershire
 GL53 8AJ

Comments: 9th February 2022

To whom it may concern;

I have family in Cheltenham and have been visiting since I was 16, now 41. I'm related to by marriage and I have visited her art studio many times. I was there just this past September and was very happy to see her and fellow artists still creating beautiful objects - I was also surprised to still see the little local business nearby had also survived covid. Now come to find out - the entire building is going to be scrapped for housing...bordering train tracks?

I live in the heart of Washington DC and I have seen my fair share clashes between private landlord developers vs community members. I understand developers put fourth their most lucrative proposal first for initial review knowing there may be concessions. So it's my hope that the development either incorporates the existing building into the design or at least provides an alternative space on the premises or offers a generous buyout to each tenant.

Tearing down a community arts space for profit... sounds American quite frankly. And what does that mean for the broader arts community? I would have thought you refined Cheltenham cats would put more value on protecting what makes your beautiful city so special in the first place. So please shift gears and try to make this work for everyone. Do the right thing.

Just my two cents - good luck to the developers but more luck the community.

Hardwick Campus
St Pauls Road
Cheltenham
Gloucestershire
GL50 4BS

Comments: 13th February 2022

The redevelopment of Lansdown Industrial Estate will be catastrophic for visual artists in Cheltenham, already and underserved and precarious community. Lansdown Art Studios provide studio space to 21 artists and has a waiting list of 30 more. There is a desperate shortage of studio space in Cheltenham and the developers are making no offer of replacement space. Affordable studio space with natural light, 24 hour access, a community of artists and good pedestrian and cycle access should be valued and retained. The loss of the Lansdown Art Studios will lead to young people moving out of Cheltenham and closer to employment opportunities. If art graduates are going to stay in the area and continue their creative practice and support the development of a thriving and diverse cultural ecology in Cheltenham, they need space to work.

36 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DA

Comments: 8th February 2022

I moved to Cheltenham from London when the town had a vibrant practising arts culture. It drew many of my friends from home to settle here and we enjoyed the classes and workshops at the Axiom and the work in progress and stunning student exhibitions at the Pittville Art School, taught by renowned artists of the day. The Lansdown Art Space gives working artists a communal space that Stroud seems to be able to manage so well but that Cheltenham has lost all too easily. The place is loved and well cared for by the artists. Don't sell out on working artists again please.

Zed House
Malvern Road
Cheltenham
Gloucestershire
GL50 2JH

Comments: 9th February 2022

In support of our OBJECTION to this application and as Chair of the Lansdown Art Studios Association, I wish to stress the importance of the Art Studios and the benefits it brings to Cheltenham's residents, its local businesses and cultural life.

LANSDOWN ART STUDIOS

Building

Lansdown Art Studios occupies what was formerly a drawing office on the first floor of Unit 1A on the Lansdown Industrial Estate. It provides 4,000 sq ft of affordable space divided into 21 mainly open-plan studios. The many benefits of the building include:-

- high ceiling and ample rooflights providing ideal natural light conditions for art
- a variety of studios ranging in size from 50 sq ft to 200 sq ft
- robust wall and floor finishes
- 24 hour access
- central location allowing access on foot or bicycle using the Honeybourne foot/cycle-path
- parking for visitors and space for delivery and collection of art and materials

Association

The art studios are run as a 'not for profit' self-funded unincorporated association, Lansdown Art Studios Association (LASA). All artists are members of the association, which is managed under a constitution and a set of studio rules. As a community association the studios provide:-

- a safe, inclusive and supportive environment for all artist members
- the opportunity to collaborate and share creatively
- space to hold group exhibitions and events
- group membership of Cheltenham Open Studios
- studios for University of Gloucestershire arts graduates

Art Community

As the largest arts group in Cheltenham, Lansdown Art Studios makes a considerable contribution to the local art community. Its artists work with and support many galleries and exhibitions, including:-

- Cheltenham Open Studios
- Fresh Art Fair
- Broadway Arts Festival
- Montpellier Gardens Gallery
- Hadfield Fine Art, Sevenhampton
- Little Buckland Gallery, Broadway
- 16 Gallery, Montpellier
- Spring Gallery, Montpellier
- Paragon Gallery, Montpellier
- Chapel Arts
- Dove Gallery, Winchcombe
- Burford Garden Centre Gallery

- Royal West Academy, Bristol

Business

The majority of the artists are self-employed with professional art qualifications. Many have worked in arts-based organisations such as architecture, graphic design, art teaching, etc and some have gained their art degrees at the Cheltenham campus of the University of Gloucestershire. Much artwork is sold by the artists through local galleries and online, to buyers locally, nationally and internationally. The studios generate much support for local businesses, including: -

- Cotswold Framing Co
- Jacksons Art
- Hobbycraft
- The Range
- Pegasus Art Supplies
- local commissions for cafés, bars and restaurants
- private commissions
- providing art training courses

Comments: 27th January 2022

These comments are made as Chair of Lansdown Art Studios Association, who occupy Unit 1A on the Lansdown Industrial Estate.

We OBJECT to the application for the following reasons:-

1. The proposed change of use from the existing employment uses to 100% residential use does not comply with the adopted Cheltenham Local Plan 2020.

2. In Policy MD1 Lansdown Industrial Estate is designated for Mixed-Use Development described as "Employment led regeneration which may include an element of residential development." Redeveloping more than 50% of the industrial estate for residential use goes against the principle of this policy. A limited amount of residential development could be sited along the Rowanfield Road frontage.

3. The application fails to satisfy the requirements of Policy EM2, in particular:

1(b) i The proposed use is (not) job-generating and the loss of employment will (not) be offset by a net gain in the quality and/or number of jobs provided on the site;

The southern part of the site is fully occupied, so no other space will be available for new jobs.

1(b) ii Development of the site will (not) ensure the relocation of an existing firm to a more suitable location within the Borough;

No proposals have been made to relocate the Art Studios or other businesses on the site.

1(b)iii There has (not) been a sustained and long-term absence of economic activity on the land with no reasonable prospect of the land being used for employment.

There are many small and medium sized active businesses on the application site, some of which are longstanding tenants. With approximately 65 number of employees in total, the current occupants are:-

Unit 1 Vacant

Unit 1A Lansdown Art Studios
Bella Interiors
GM Harper
PC & Mac Repairs
Company Vehicle Buyer

Unit 2 Rhoda Precision Tools

Unit 2A Vacant
Unit 3 Quorum Print Services
Phase 5 Design
Frontier Print & Design
Unit 4 Quorum Print Services
Frontier Print & Design
Unit 5 PDR Car Repairs
NW Body Repairs
Unit 6 Juliana Group
Unit 7 Squid Soup
Unit 8 EPC
Unit 11G MS Motor Services
Unit 15 C & G Omnibus Co
Unit 16 Spa Vapes
Unit 16A Spa Vapes
Unit 17 Vacant
Unit 17A Noble Furnishing

4. Many of the buildings on the southern part of the site have recently been refurbished. Although some of the buildings on the application site are in poor condition, most are of sound construction and equally capable of upgrading or repurposing for a variety of mixed uses. This would be a more sustainable approach to redevelopment than wholesale demolition.

5. The art studios have been in occupation for 25 years and provide studio accommodation for 21 artists. No alternative premises have been offered and the demolition of the studios will be a great loss to the artists and to the wider Cheltenham arts community.

6. Policy HE1 seeks to protect historic buildings. The art studios occupy what was once the drawing office of H H Martyn, the historic Cheltenham company famous for manufacturing the Titanic staircase and Spitfire propellers during WWII. This building should be retained for its importance to the industrial archaeology of Cheltenham.

Comments: 25th May 2023

As Chair of the Lansdown Art Studios Association, on behalf of all our current artist members, previous members and artist colleagues, we are pleased that as a result of beneficial negotiations with the applicant, planning application no. 23/00728/FUL is submitted for replacement art studios in another location on the Lansdown Industrial Estate. This will provide sustainable art studios that will benefit the arts culture of Cheltenham and provide a long-term home for our large group of artists.

If application no. 23/00728/FUL is approved, then all our previously recorded objections to this application are unreservedly withdrawn.

61 Bath Road
Cheltenham
Gloucestershire
GL53 7LH

Comments: 28th January 2022

I object to this application for planning permission for a number of reasons:

I moved to Cheltenham from London in autumn 2021 as my job became permanent in Cheltenham and my hours increased so I could not continue to commute. Since graduating from the Royal College of Art in 2019 I have worked as a lecturer in Fine Art at the University of Gloucestershire. I am also embarking on a practice-based PhD at the University of Gloucestershire. This part-time PhD will be 6 years and I fully intended to remain at the studios in Landsdown for the duration and beyond.

I struggled to find studio spaces locally- it seems the provision of spaces is very minimal in Cheltenham. This as a result means that graduates often move away instead of bringing their skills, knowledge and monetary value to the town. I was fortunate to eventually find a space at Landsdown with a great community of artists. The space is a significant part of the creative scene in Cheltenham and offers studio spaces to a significant number of artists. The artists have a public facing approach to their work and hold events to engage the public a number of times a year. This brings in a large crowd of people and has value financially. The studio spaces are critical to the wellbeing of and financial security of a number of professional practitioners and has a significant impact on the public through engagement.

Having moved from London where sadly artists who come in and make areas more interesting are continually pushed out often to make way for new "affordable" developments that are unaffordable to the vast majority of hardworking people, it saddens me to see that this is also happening here.

Often the development stays empty for a long time after creatives are evicted which causes security issues and antisocial behaviour increases. This gentrification at the cost of established industries must be avoided. The housing required often doesn't reach those who are from the area and who actually need somewhere to live, with houses being sold as second home pied a terre's or to rent on the air b and b market.

Finally as a person who is new to Cheltenham and who has also been struggling to find somewhere to live in this town. Although the housing market and rental market is limited right now and it is difficult to find secure housing I would not live on this industrial estate for the following reasons; It would not feel safe returning here at night, the roads around are unlit and it is often empty in the estate after working hours. Further to this, living next to industry is unhealthy and it would not be a peaceful place to live with lorries arriving throughout the day and night to unload and load goods.

I urge the developers and all those involved to reconsider the impact that evicting such a number of working artists will have on the fabric of the town and to reconsider this plan

unless there is a firm plan in place to rehouse all the artists currently renting Lansdown Art Studios.

St Raphaels
Douro Road
Cheltenham
Gloucestershire
GL50 2PF

Comments: 7th February 2022

I object to this planning proposal. I am an artist resident in Lansdown Art Studios and am devastated to find that the proposal intends to demolish our studios. This comment comes very much from the heart:

There are 21 artists working in our thriving self-managed community. Over the last five years we have worked so hard to promote the studios, 'opening up' several times each year to allow the public to visit and purchase works direct from the artist. There is little profit for individuals but it does contribute to our rental costs, allowing for a viable artist life. We simply wouldn't be what we've become today without this space in which to come together and work.

We have consistently worried about something like this happening to the building. We have tried to source a permanent home for ourselves over the last few years. There has never been an affordable alternative on the market for us to collectively buy or rent. Large buildings are consistently sold off to developers for demolition for housing or flats. Cheltenham real estate continues to rise and we are simply priced out of the market. We are aware of the need for affordable housing but surely that should be balanced with affordable workspaces for artists and small business. Working individually from home is not a viable option for most of us and it's certainly not how a creative community thrives.

We don't ask for much. The roof leaks when it rains heavily, there is no hot water, toilets are often without basic supplies and we can no longer afford WIFI. But we don't complain. The light that streams through those leaky roof lights is wonderful and we are all so very grateful.

Please consider this proposal with the care it deserves as demolishing this building will crush 21 creative spirits (and the other small businesses on the ground floor of the building)

28 Brymore Close
Prestbury
Cheltenham
Gloucestershire
GL52 3DY

Comments: 2nd February 2022

Art is fundamental to our society and Cheltenham has vast support for its festivals, but the visual arts needs the same level of support. With the possible demolition of Lansdown Art Studios this would be a massive blow to the arts, artists and the general public.

Unit 27
Lansdown Industrial Estate
Gloucester Road Cheltenham
Gloucestershire
GL51 8PL

Comments: 3rd February 2022

DEYA Brewing Co supports the application but would like to point out some concerns:

- 1) Parking: DEYA are concerned that there is insufficient parking designated per household in the development which could/will result in a spill over into the industrial units.
- 2) Goods Vehicles Access: DEYA are concerned that the access into our warehouse U26 is limited in respect to the boundary of the development
- 3) Flooding is a real issue with the existing site -provision in the application to solve the problem needs to be more detailed.

128 Brooklyn Gardens
Cheltenham
Gloucestershire
GL51 8LW

Comments: 8th February 2022

I object to the demolition and development of unit1A Lansdown Art Studios as it appears to be inconsistent with the council's policies and viewpoints. I am not an artist but my visits to the gallery showings at these studios has demonstrated the creativity and ability of local artists and has illustrated what a hub this centre forms within the artistic community in Cheltenham.

This thriving art community is run as a non-profit association and can only be viewed as a creative enrichment of our community yet you serve to remove this in favour of affordable housing. This is something which I find surprising for a council which prides itself on its art and cultural support and festivals.

The loss of this vibrant art community is not only a tragedy for the promotion of arts in Cheltenham but affects the livelihoods of many of the artists and this plan will also impact many other small business and their employees in the local vicinity. Please reconsider.

Little Buckland House
Little Buckland
Broadway
WR12 7JH

Comments: 31st January 2022

Lansdown Studios has provided a wonderful community for Cheltenham based artists for many years. Particularly vital as creating art on your own is very challenging.

As a previous chairperson of Cheltenham Open Studios it has always surprised me how little Cheltenham Borough Council does to support local artists in comparison with other forms of the arts via the festivals.

It would be disastrous if so many talented artists lost their studios.

8 St Georges Terrace
St James Square
Cheltenham
Gloucestershire
GL50 3PT

Comments: 2nd February 2022

I would like to express my objection to this application.

I am a TENANT within the Lansdown Art Studios, located on the area of the site planned to be demolished.

Points worth considering:

There are very few studio spaces available in Cheltenham for artists. There is far more demand than provision; there are many artists who would like to rent a studio and cannot for lack of availability. ...And this in a town such as Cheltenham where culture and leisure and quality of life play such an important part.

No alternative studio accommodation has been offered by the developers.

The presence of artist studios is of great benefit to Cheltenham but for many may go unnoticed. Artists are, in a sense, the start of a 'commercial food chain'. The artist makes work and galleries and exhibition spaces display it and sell it. Galleries and visitor attractions play a key role in the way Cheltenham presents itself among other potential destinations for visitors both domestic and overseas. It builds the cultural backdrop to the town, and as visitors come to enjoy Cheltenham's ambience of quality and variety and

sophistication (if I may put it like that) all elements in the visitor-leisure industry benefit from hotels to restaurants to cafes and other commercial outlets in town.

I wouldn't seek to present artists and artist studios as THE starting point in this chain but it is an important component and without studio spaces the town is diminished. Cheltenham is nationally known as a cultural hub; the preservation of work spaces for those working in the arts is so very important.

Chosen View
Southam
GL523PB

Comments: 6th February 2022

The Lansdown Estate has become a thriving area for the community, supporting many small businesses and bringing a great range of food and drink businesses to this area. The art studios are so important, they offer affordable spaces to the artists and the opportunity for the public to visit this wonderful space. I think it would be a real loss to the community if any of these spaces were lost.

30 Willowherb Close
Cheltenham
Gloucestershire
GL52 5LP

Comments: 9th February 2022

Lansdown Art Studios currently have a petition running on <https://www.change.org/p/cheltenham-borough-council-save-our-studios-lansdown-studios-cheltenham/c>

At the time of writing after only 2 weeks we have 405 supporters with the numbers growing daily.

Detailed below is a small representative sample of 6 comments

I'm signing this petition because there is a lack of studio space as it is. There are hardly no community buildings left for people to have a recreation time out. So find somewhere else and keep your hands off studio spaces.

It is such a shame to see a creative space that provides benefit to so many under threat. These places are very scarce as it is and so important for people of all ages to be able to get together today learn, share knowledge and develop their talents.

Art is fundamental to our society and Cheltenham has vast support for its festivals, but the visual arts needs the same level of support. With the possible demolition of Lansdown Art Studios this is a massive blow to the arts, artists and the general public.

Art is really important to everyone it's enjoyable relaxing and creativity is good for mental health. Studios must be preserved to help maintain the practice and growth of artists.

I feel it would be a great loss to the artistic community in Cheltenham. We don't need more houses we need more space for small business to create jobs and diversify in the town.

The Arts are always under threat, yet Art contributes so much to our wellbeing and to our economy. What problems will society face in future years when there is housing everywhere and no facilities or creative outlets for people? These studios are more than just a hard-earned workspace for 21 people. Cultural values are also at stake.

It is a rare venue where artists can create and inspire each other . Not only that but public also get to view their work at social open gallery exhibitions. This is a real pleasure to see art in situ enjoyed by many I know . We have nothing like this in Cheltenham. Please keep these studios going!

Comments: 28th January 2022

Cheltenham's -2019 -2023 Corporate Plan

"The starting point for our new plan is Cheltenham's place vision. This is the collective commitment to ensure that Cheltenham is a place where everyone thrives supported by a thriving economy, a thriving cultural offering and thriving communities. We have made sure that the commitments in this plan support this vision".

I object to this planning application as I do not feel that it complies with the 2019 -2023 Corporate Plan.

The opening statement is above. As is clear from the above, the demolition of Cheltenham's largest art studios does not support 'a thriving cultural offering and 'thriving communities'.

Lansdown Art Studios is a "thriving" artistic community and run as a non-profit association. It plays a significant part in the art culture of Cheltenham and supports many of the galleries in Cheltenham.

On a personal basis the art studios have given me an artistic community to thrive in and has allowed me to develop as an artist.

Five years ago, I was made redundant and decided to move into the creative community. It took me over six months to find a studio as there is such a dire shortage of studio space in Cheltenham at an affordable price. Lansdown Industrial Estate is the only place in Cheltenham that still offers creative space at a sensible price and should be valued as part of Cheltenham's vision statement where everybody thrives.

If the building is demolished, not only, will Cheltenham's largest artistic community be dismantled, it will mean that I and many others will have to search for a studio in either Stroud or Gloucester with the environmental consequences of having to travel. I appreciate the need for housing but not if it means that Cheltenham exports jobs to our neighbouring towns. If the building is demolished, the landlord should make provision for the artistic community elsewhere within the site. The pension fund (Cheshire West & Chester Council) which owns the site has no loyalty to Cheltenham and is purely driven

by the profit motive without any real regard for the artistic community. Cheltenham has, for a long time, recognised the importance of arts within the town and, if this planning application is to go forward, it would be a major step backwards. I would ask that the planning committee really think about the unintended consequences of this application. Thank you for taking the time to read my comments

The Dairy
The Leigh
Gloucester
GL19 4AG

Comments: 2nd February 2022

I object to the demolition and development of unit1A Lansdown Art Studios
I am an artist who has rented the studios for a number of years.
Art studio space is very limited in Cheltenham as can be seen from the long waiting list for a space in the studios.
My work has benefited from having a dedicated space to work in and also from belonging to a creative hub of like minded people.
We are 21 artists, a thriving artistic community. We contribute to the cultural life of the town through workshops, open days in the studios and exhibitions in different art galleries in the town and around Gloucestershire.
Thank you for considering my objection

79 Marsh Lane
Cheltenham
Gloucestershire
GL51 9JE

Comments: 4th February 2022

Cheltenham has a terrible lack of affordable premises for small businesses and this excellent space for the artists studios is hugely valued by the community. To lose it would be a disaster for many self employed artists

9 Clarence Square
Cheltenham
GL50 4jn

Comments: 13th October 2022

The proposal is wrong on so many levels. Once buildings like this are gone they are gone forever - cheltenham has little of its important industrial heritage left so please do not approve this awful proposal.

Don't also forget the environmental damage which will be caused by knocking down and building new - it is far a better to reuse/repurpose what is there.

The Brambles
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 6th February 2022

The proposed development appears not to comply with the local plan. It does seem strange that other developments in the greenbelt are allowed because there is a shortage of employment land, yet there is a risk here that employment land is developed for housing, despite the huge housing developments being planned for West and North West Cheltenham.

2 Northwick Close
Cheltenham
Gloucestershire
GL50 2RJ

Comments: 9th February 2022

I think it would be detrimental to the area to lose this wonderful amenity, Cheltenham would be worse off if the studio's were lost.

1 Coronation Road
Prestbury
Cheltenham
Gloucestershire
GL52 3DA

Comments: 8th February 2022

I am writing this complaint as chair of Cheltenham Open Studios (COS), representing well over a hundred amateur and professional artists. This representation include the artists based at Lansdown Art Studios who are active and enthusiastic members of COS.

COS members whole heartedly support 'Save our Studios' document which outlines our shared concerns.

There is a desperate shortage of studio space in Cheltenham (as demonstrated by Lansdown Art Studios' long waiting list). Affordable studio space with natural light, 24 hour access, a community of artists and good pedestrian and cycle access should be valued and retained.

It appears that the plans make no reference to replacing the studio accommodation, and COS members and the wider community are concerned that many local artists will be unable to practise their skilled and much valued profession.

If artists are going to stay in the area and continue their creative practice, they need a thriving artist community, and space to work and share ideas.

Unit 16
Griffin Mill, Thrupp
Stroud
GL5 2AZ

Comments: 6th February 2022

I was lucky enough to have one of the studios a few years ago. Studios like these are becoming increasingly rare these days and artists find themselves continually marginalised by the ongoing redevelopment plans of towns and cities such as Cheltenham. Far from being 'hobby' artists, the artists in these studios work tirelessly and often in less than ideal conditions. They cannot afford "commercial" rents and are often just 'getting by' financially. Places like this deserve the council's protection from over-enthusiastic developers who are only interested in making money. After all there is much more to life than money as the work artists produce continually reminds us.

204 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AQ

Comments: 13th February 2022

What a sad loss this would be when we in fact need more artistic spaces like this interwoven in our streets, not less.

Rissington House
Croft Street
Cheltenham
Gloucestershire
GL53 0ED

Comments: 7th February 2022

I object to the proposed demolition of Lansdown art studios. I have been a fairly regular visitor and know one of the artists well. The studios have been a life saver for artists who need space for their work and breathing space to be productive. The demolition will mean the loss of 21 studios. Where will these artists go? Cheltenham needs more artist space not less to retain a vibrant hub which is essential for the cultural life of the town.

45 Surrey Avenue
Cheltenham
Gloucestershire
GL51 8DF

Comments: 29th January 2022

As a local resident, I am totally against this. Cheltenham doesn't need more houses.

It needs more hospitals, schools, better roads, culture, better roads.

The Lansdown industrial estate provides vital services and acts as employer for multiple businesses. It provides diverse job opportunities for a local community, from art, to mechanical, to food and drink. It's draws tourism to Cheltenham.

Building houses on this site will take this away.

I fully object to the proposed plans. I would like to be part of any discussion to develop housing in this area.

5 New Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8JJ

Comments: 6th February 2022

I am objecting to this application. The entire application appears to hinge on the assumption that the north part of the estate has no intrinsic value apart from its land value. Financial valuations are only being considered based on the quality of the existing buildings (I also note that there is no mention of the existing owners making a concerted contribution to the upkeep of the north but there is comment that they are committed to the south - thus making the decline of the north section almost a foregone conclusion] no account has been taken of the quality of the inhabitants and their contribution to the community. Surely financial measures are not the only ones that should be taken into account especially when the buildings house a vibrant artist community which In turn facilitates material contributions to the local cultural landscape.

The value of the cultural community is across the board when it comes to audiences. This is not an offering limited to only one class of cheltenham citizen. It appears to me that the housing Proposal will only benefit a few members of society. Acknowledging the contribution of the artist Studios to the creative landscape of Cheltenham must in some way redress the imbalance in the current proposal and should be considered. As indeed should the impacts on all of those artists livelihoods if the proposal goes ahead. They appear to have been ignored completely. finally, how does this fit with the current cheltenham public art strategy And our image as a festival town?

13 Wakes Meadow
Bunbury
CHESHIRE
CW6 9SH

Comments: 9th February 2022

The Lansdown estate is in need of renovation to bring it up to the standard that will attract the flourishing businesses and other facilities that Cheltenham needs to thrive both economically and as a vibrant community. To demolish rather than restore business premises for the sake of housing seems extremely short sighted and goes against the vision of the 2020 Cheltenham plan. I am particularly concerned about the art studios which have been a self run hub of creativity for 25 years with 21 artist forming a strong supportive community through thick and thin. It is a tremendous asset to Cheltenham, including being a major contributor to the biennial Open Studios event . It is also a lifeline for members of this productive group. I have recently moved just outside Cheshire West and, as a strong supporter of the council, I understand the need to maximize income in these straightened times, but not at the expense of the interests of another local council and its community.

63 Westward Road
Stroud
GL5 4JA

Comments: 9th February 2022

Affordable artist studios are essential for work of the local artists as well the work they complete in and with the local community. Artists add value to Cheltenham.

31 Princes Road
Cheltenham
Gloucestershire
GL50 2TX

Comments: 8th February 2022

I am sorry to see that, yet again, it seems to be all or nothing in terms of housing and employment opportunities on the outskirts of town, while areas such as St Paul's and Tivoli and places such as Gloucester appear to be able to blend the two. The artists' studios (which received enhancement grants not long ago) support employment in a town known for its festivals and other culture, while businesses near them - are within walking distance of residential areas of town. Mixed use in the area would also be better for traffic considerations with counter-cyclical coming and going, rather than up to 215 cars (or more) heading out/back from to school/work. I also wonder whether the landowners, linked with a city council, would make a comparable application in Chester and destroy employment opportunities? Thank you for considering my comment.

42 King Arthur Close
Cheltenham
Gloucestershire
GL53 7EX

Comments: 31st January 2022

I object to the demolition and development of unit 1A Lansdown art studios.

1. the studios offer affordable spaces for a diverse group of artists of all ages from young graduates who wish to develop their practice and as a stepping stone to future careers, to older artists often retirees from a variety of other professions eager to develop artistically and creatively and share their valuable expertise.

2 I am a retired teacher and have been a tenant at the studios since 2006. During this time it has been a valuable space for me initially as a peripatetic tutor to adults in rural communities . My studio was invaluable for me to prepare my classes and keep materials I needed for my students as sessions took place in community venues like village halls. Sadly I had to give up teaching to become a carer for my late mother. The studios offered me respite and support from the artistic community where I could develop my work and take part in Open studios and other exhibitions.

3. The closure of the studios will have a detrimental effect on other businesses in the area i.e picture framers, local galleries and art suppliers where we are all customers.

4. Closure will mean a devastating loss both to the individual artists and the cultural life of Cheltenham. Our last Cheltenham Open Studios was enjoyable both for the artists and the public who visited, a much needed optimistic event after the isolation of the past two years.

Thank you for taking the time to read this.

Belmont, New Road
Woodmancote
Cheltenham
GL52 9PX

Comments: 29th January 2022

I object to the planning permission 21/02832/OUT for the following reasons:

1. The building of 215 homes would mean uprooting several long-established businesses who have made a significant contribution to the local economy, provided a quality professional service, and contributed to the area through employment opportunities. Some of these businesses have been on these premises for over twenty years and the tax revenues they have contributed along with helping to provide service and value to the local economy has been significant.

2. The Lansdown art studios provides high quality studio space for 21 professional artists. Those who pay for the studio's services are making a significant contribution to the creative economy. The UK economy contributed £115.9billion to the economy in 2019. This accounts for 5.9% of the UK economy as a whole.

3. The Lansdown art studios provide not only premises from which professional artists produce work which generates tax revenue but also provides a centre for the community in Cheltenham. Workshops, live events and Cheltenham Open Studios all help build relationships within the community, provide opportunities for businesses to collaborate and network.

4. Businesses, through no fault of their own be forced to find new premises. There are no guarantees that these locations will be favourable to target a buying market and may see many of those businesses see a downturn in revenue.

Likewise, all twenty-one artists working at Lansdown Art Studios will be forced to find new studio space of which there is very little in Cheltenham. This will mean many having to give up their livelihoods altogether or drastically change their artistic practice. This would have a detrimental impact on galleries in Cheltenham such as Sixteen and Spring which have been helping to build a vibrant art scene in the town.

5. Long term commitment to operation of businesses on these premises should be rewarded. If these tenants are evicted then the landlords surely have a duty of care to offer suggestions of replacement premises which are not detrimental to their business.

Flat 6, Match Court
5 Blondin Street
London
E3 2UU

Comments: 3rd February 2022

My mother is a member of the studios at Lansdown. Having visited many of the open studios and shows associated with this space, I have witnessed what a thriving vibrant community it is at the studios - serving as a precious, and crucial hub for Cheltenham's artistic community - a community whose contributions to the rich creative flavour of Cheltenham Spa should be protected and nourished, not swept aside.

6 Chadbournes
Churchdown
GLOUCESTER
GL3 2AE

Comments: 9th February 2022

I wish to object to the demolition of Unit 1A, which is home to Lansdown Art Studios Association.

My objections are based on the need for Cheltenham to balance the provision of new homes with the availability of smaller commercial premises. It is vital that if the town is to remain a vibrant place to live, work and play that spaces such as Unit 1A are not lost to the community.

Page 251

Unit 1A, with its glazed skylights, is a facility that Cheltenham can ill afford to lose. There is very little smaller commercial property suitable for the creative arts, and demolishing this building would drive this activity out of Cheltenham.

The removal of this facility would be detrimental to the arts in Cheltenham and to the artists who use the building.

- It is essential that new and emerging artists are able to rent a space to develop their craft so they can contribute to the arts in Cheltenham.

- The well-being of local artists is best served by having a space for collaboration and friendship.

- It is important to understand that for many artists, this is a place of work. More and more people wish to have a portfolio career that includes creating art. Like many older artists, I wish to remain economically active past retirement age, which these facilities make possible.

- The work created in this building contributes to the arts in Cheltenham through exhibitions around the town and beyond.

In summary, the demolition of Unit 1A without a requirement to provide alternative affordable accommodation would result in artists not working, creating, or socialising in the town. This would significantly reduce local artists' contributions to ensuring Cheltenham is a lively centre for the creative arts.

53 Cecil Road
Gloucester
GL1 5HG

Comments: 3rd February 2022

I object to the demolition and development of unit 1A Lansdown art studios.

I have always enjoyed the Open studio events and amazed at the variety of Art produced by the artists.

The loss of the studios will be disastrous not only for the 21 individual artists but for Cheltenham's cultural life.

17 Bush Court
Priors Road
Cheltenham
Gloucestershire
GL52 5JL

Comments: 1st February 2022

Lansdown art studios are a core of the artistic community in Cheltenham. They provide affordable artists studios, supporting the livelihoods of the artists that work there.

Cheltenham borough council has sold off so many of our community assets, we cannot afford to lose this one too.

Art inspires us all to be creative in our lives, it gives us hope, it stimulates and connects us to our felt senses and emotions. We as a Cheltenham borough community should be doing ALL we can to support artists. Not only for the creative enrichment of our community, but for the financial benefit that art brings. The Cheltenham open studios event for example brings visitors to our borough to spend money here.

I want my council to support life in FULL COLOUR, not shades of grey. We should offer our respect and gratitude to the artists of Cheltenham for supporting creativity, uplifting the lives of people in our community, for being brave enough to walk a road less travelled. Artists work from their heart and souls as well as their logical minds. This is what the spirit of life can offer.. Colour, beauty, interest, the sharing of creative ideas, collaboration and community. This is what new earth is calling for.

Thankyou for listening to the stirring in your creative soul.. Let us celebrate our creative nature instead of demolishing it.

16 Hopwood Grove
Cheltenham
Gloucestershire
GL52 6BX

Comments: 9th February 2022

This area is full of incredible spaces that many individuals are culturally & artistically thriving in. Businesses are growing and skills are being taught in many creative forms.

If we lose this growing hub of an industrial estate, we risk becoming a mass of dull repetitive housing. Instead we need to invest, grow and encourage the use of the industrial estate for all forms from music, art, hospitality and trade skills.

Some of our neighbouring cities have these very hubs that thrive and bring tourism, with the train station & popular bus route right on this industrial estate it would be such a shame and a waste to demolish this area and build more boring houses.

Unit 42
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

Comments: 7th February 2022

Letter attached.

Comments: 7th February 2022

Firstly, I would like to reiterate the general disappointment that we expressed as part of the consultation process with the Landlords representatives in August 2021 (copy attached), that the plans are under consideration for a scheme that will result in the reduction of industrial space in favour of residential on this site. Commercial space in Cheltenham is already at a premium with high demand, and this will be detrimental to the protection of employment in the local area.

Having now studied in detail the various documents submitted in relation to the application, please find set out below, a number of specific points of concern we would ask to be addressed as part of the planning process.

Access and Public Safety

- Have the Public Protection Team been consulted on this scheme ?
- Specifically has a health and safety assessment been undertaken of the risks presented by an increased volume in pedestrians and cyclists ? The proposed pedestrian and cyclist access route is through an area of high industrial traffic, including heavy goods vehicles and fork lift trucks as well as busses in the main entrance area from the Gloucester Road. This is particularly concerning bearing in mind a high number of these pedestrians and cyclists are likely to be children who will be tempted to use the area as an extended playground and bike park ?
- What improvements to the Gloucester Road access and additional provision for HGV turning points are being considered, if vehicular access to the remaining industrial units is reduced through the removal of access from Rowanfield Road ? We raise this particularly as it is our understanding that this entrance is owned by ABC Motors with a legal easement / automatic statutory declaration attached to it.
- Please find attached a number of photographs demonstrating the already congested nature of heavy goods vehicles, fork lift trucks and general site traffic in this area. This will be further exacerbated if space is lost for vehicular access in the provision of additional pedestrian walkways and cycle paths.

Noise & Odours

- Has a noise impact assessment been undertaken ?
- The V3 unit has a compressor sited 1 metre from proposed garden boundaries. This compressor can operate 24/7 during peak production periods. Due to the intermittent nature of demand it will be also be more noticeable than something with a constant background noise.
- What provisions is it proposed will be put in place around screening and noise insulation to ensure that industrial tenants do not face a continual barrage of residents' complaints on noise, odours and impact on their outlook that there will practically be very little they can do to improve, and actually shouldn't have to do, when occupying an industrial unit that permits B1, B2 and B8 use ?
- We have created more than 25 new jobs on our site over the last year, and demand for our products from this site is high. We need to be able to continue for the purpose we entered into a lease on, and without risk of restrictions on our operating hours and processes being imposed in the future.

Parking

- Have the Council Highways Team been consulted on the proposals ?
- The Travel Plan included in the application documents implies that there is a proposal to reduce from the standard CBC recommendations, the ratio of parking for each size of dwelling. If this is accepted, how is it proposed to manage and police the excess cars in the vicinity and ensure that they do not overspill onto the remaining industrial area of the estate further exacerbating the already challenging parking, access, safety and security issues referenced above ?

Site Security

- How is it proposed that security will be maintained in the remaining industrial area which is currently managed through gates at the main access points that are locked to the general public between 21/2200 hrs and 0600 hrs daily ?

Flood Risk

- The planning documents include a report on the flood risks for the new development area that has identified a risk of ground and surface water flooding for which there appear to be plans to mitigate and manage. Please advise what mitigation measures will be undertaken to manage ground and surface water in the remaining industrial units area due to the reduction of impermeable surfaces from the new development, and the risk of excess water seeping into the neighbouring area ?

Images demonstrating Congestion forwarded to Planning Officer and Ward Councillors

22 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 8th February 2022

- 1) The traffic survey was obviously manipulated to give the results required by the developers. With far less traffic going onto the existing estate and there will be considerably more going onto the new development.
- 2) Not only is the parking data 10 years out of date, it has been manipulated down to suit the small space available , it doesn't meet the needs of the area.
Also there is no mention of the removal of existing parking spaces due to the new houses with drop kerbs on Rowanfield Road.
- 3) There has been no implication of the impact the dwellings will have on local resources e.g. schools, Dr's & dentists (the NHS dentist shortage reported in a recent local councillor's publication)

34 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 8th February 2022

I am writing to object to the above Application. This is not an objection to the entire development; we are asking for consideration for part of the proposal, in particular the five-storey apartment block that would potentially be built at the bottom of our garden; ours being 34 Rowanfield Road but would also affect, to the same extent, the gardens of 36 and 38 Rowanfield Road.

There were five possible scenarios for the above development, two of which we support, two which would mean a five-storey building at the bottom of our garden, to which we object, and one that we would consider acceptable.

We submitted questions surrounding this to the public consultation held online on 28th July concerning the height of the proposed building and the fact that this would be overlooking our garden. This was met with a disappointing and concerning response from Simon Furkins of SF Planning -

"..mindful while exploring various options. Might be a bit of transition but they are roughly the same as the existing buildings that sit there at the moment".

After calculating the height of the existing building and looking at the proposal, the height difference is almost double. This is a misleading statement to the residents and also to the Council. The interest of existing residents has not been taken into consideration and it is a concern that if this element of the development has been fabricated, it questions the integrity of the rest of the development. This is a significant change to the current views of our garden. To have such a huge building at the end will drastically alter the garden which has been in its current condition and surroundings for 110 years.

There are currently buildings of the proposed height in situ on the Lansdown Industrial site. If they require apartment blocks of significant height, it makes more sense to put them where there are already tall buildings in place. The site is vast, and it seems impractical to try and place a huge apartment block into such a small area which could create many issues when there are sensible alternatives.

Lastly and perhaps the most important feature is the fact that there is no doubt that the current layout proposal would severely affect the Protected View of St Mark's Church which is visible from our garden and every window facing the church from our home and is incredibly important to us. This will also apply to numbers 36-40 to a similar extent.

The height would not only alter the natural light into our garden which enjoys a wide variety of plants and a vegetable patch which would be affected by the five storey flats, but it would also take away the privacy that we value. We have a young child and there are families with young children all along Rowanfield Road that enjoy the privacy and safety of the gardens. The fact that these would now be overlooked is a huge concern. This will take away our privacy, sunlight and views.

Page 256

Regarding the angled windows, although they mention that the windows will be of this design, in effect you could still look into the garden if you wanted to and we do not deem this a suitable mitigation.

They also mention that they have complied with Separation Distances. This may be the case, but they have stretched this to the absolute limit, meaning there will hardly be any space between the end of the garden and the proposed flats. This also poses a security risk.

To conclude, we strongly object to the current Application: Layout Proposals 1 and 3 as shown in the Pre-Application. Layout 2 does not present as many issues and Layout options 2 and 4 have our full support.

Comments: 8th February 2022

Amendment to previous comment - The Church view that would be obstructed from 34 Rowanfield Road would be the view of Christ Church and not St Mark's.

28 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 8th February 2022

We strongly object to this development on many grounds.

1 Loss of privacy from the 4 storey flats to be built next to our garden and increased light pollution .

2 Concern over people climbing over the wall onto our property and down our lane as a short cut to Rowanfield Road. Antisocial behaviour from the carpark at the end of our garden.

3 Insufficient thought has been given to surface water flooding. As we are lower than the site after rainfall water run off from the estate flows through the top of our garden.

4 We feel there is not enough parking for the amount of vehicles expected, so will increase the amount of traffic and parking on Rowanfield Road, making the road even more dangerous .

5 There are bats in the area and we think they may be roosting in the historic buildings on the estate .

6 The existing sewers on the estate are old and will not cope with the increase in volume of people.

7 After the development this area will go from highly populated to over populated.

38 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 9th February 2022

I support the use of brownfield sites but only with the necessary infrastructure being in place.

I live on Rowanfield Road which is already unable to cope with the amount of traffic which uses it. The condition of the road is dangerous, particularly for bicycle riders. People drive much too fast because it is one of the few roads in the area without speedbumps and it also acts as a rat-run when the level crossing is closed. With an extra 215 dwellings using the road - and they will - there needs to be serious consideration of its condition and renovation. The terrible condition of the road will be exacerbated by the demolishing and building process, as well as it already being used for HGV lorries for which it is completely unsuitable.

My garden backs on to Lansdown Estate at the narrow end. At the moment there is a large warehouse close to my fence. The proposed block of flats needs not to be so close it overlooks the gardens or blocks the light and view of Christ Church - the plans make much of the importance of the view of the church, as they do of the view to St. Marks from another direction. I have no assurance that the view from my house across to Christ Church will not be blocked. I hope this is the case and would like assurance that the row of houses at this end will not be closely overlooked and our light and view not blocked.

4 Queensholme
Pittville Circus Road
Cheltenham
Gloucestershire
GL52 2QE

Comments: 7th February 2022

The art studios are a unique facility for art in Cheltenham. They offer a relatively low cost space for practicing artists who enrich this town through open days and exhibitions. It seems dreadful that the council would support the demolition of the site without stipulating that a developer provides what is essentially a small area for art to flourish. Is it not possible to incorporate at little expense an art space within this development which would benefit the immediate area and the town as a whole?

5 Millway
Wellington
Hereford
HR4 8AS

Comments: 1st February 2022

I have a studio in a similar complex in Hereford and know first hand how vital these studio complexes are to enable artists to keep going. It is almost impossible to find affordable places to rent as studios on the open market, but there is also huge benefit to individual artists at different stages in their career and development to be part of a mutually supportive community.

Lansdown Art Studios also bring much to the wider community through Open Studio events and similar. People love to visit studios and engage with artists this way, it deepens their appreciation of art and contributes significantly to the cultural life of Cheltenham.

23 Keynshambury Road
Cheltenham
Gloucestershire
GL52 6HB

Comments: 27th January 2022

I wish to object to the plans with particular attention to the following point
1(b) ii Development of the site will ensure the relocation of an existing firm to a more suitable location within the Borough;¿

I waited several years before being offered a studio at The Lansdown art community nearly a year ago. There is a huge demand for such spaces and is particularly important, not just for Cheltenham Artistic community as a whole, but for those who like to visit and appreciate our work. Community Studios are affordable, encourage creative collaborative work and increase the wellbeing of artists in a profession that is relatively low paid and could otherwise be solitary.

It appears that no proposals have been made to relocate the Art Studios or other businesses on the site. It can only be detrimental to Cheltenham if these spaces disappear.

31A Upper Park Street
Cheltenham
Gloucestershire
GL52 6SB

Comments: 2nd February 2022

We need the arts more than ever, for our mental and emotional health. This studio must not be destroyed.

Beech House, Parkend Road
Coalway
Coleford
GL16 7HX

Comments: 2nd February 2022

We are writing to express our dismay at the plans to demolish the Lansdown Art Studios to make way for a housing development. These studios have been established for many years and support 21 artists who frequently conduct open studios, which we regularly enjoyed visiting, and have often bought paintings there. It is always an interesting experience and greatly adds to Cheltenham's cultural life. It is very common for artists studios to bring vibrancy and life to an area, which also encourages other businesses, to find they have then to move out to make way for developers. It would be wonderful to think that Cheltenham is ready to buck that depressing trend, and support the talented and professional artists that create their artworks in Lansdown Art Studios, by rejecting planning permission for the housing development. We and friends in our area are happy

to travel into Cheltenham to see the exhibitions that the artists put on there, and other venues in Cheltenham, and then go for a meal afterwards in town - these are trips we will not be making if the studios no longer exist.

42 Rivelands Road
Cheltenham
Gloucestershire
GL51 9RF

Comments: 31st January 2022

I have been renting a studio space at Lansdown Art Studios (LAS) on the Lansdown Industrial Estate since 2007 and I was distressed to discover that our wonderful studios and the other historic buildings which house many small businesses are being threatened with demolition to make way for over 200 so called 'affordable' houses.

I feel that the lives of all 21 of the artists at LAS are greatly enhanced by being in our artistic community. Given the dearth of other suitable premises in and around Cheltenham, this would seem like a very shortsighted act that is based solely on financial gain.

Whilst I appreciate there may be a need for affordable housing in the area I think this would be a disastrous choice of site located as it is directly adjacent to the main Cheltenham Spa railway tracks and with a very limited road access. There are surely more accessible brownfield sites in and around Cheltenham. Living as I do in Swindon Village, I have been watching the growth of the vast warehouse complex on the old Vibixa site and will be interested to see if this proves to be necessary or could this not have been considered as a suitable area for new housing.

14 Great Western Road
Cheltenham
Gloucestershire
GL50 3QN

Comments: 27th January 2022

I object to the plans as they do not conform with current planning policy for the Lansdown Industrial Estate as set out in the adopted 2020 Cheltenham Plan.

Policy MDI: Lansdown Industrial Estate states that the site is suitable for "Employment led regeneration which may include an element of residential development"

215 dwellings will cover more than half the site, and lose the art studios with 21 artists and numerous other small and medium sized businesses and their employees.

I am one of those artists and have been at the studios for over 3 years now. There is little if not any other affordable, suitable premises for our community to relocate to. We have not been offered any alternative premises on site.

Page 260

We feel that the building is solid and fit for purpose, while it does need reparative work on the roof to stop leaking when it rains. It is still serviceable and ideal for our needs. It would be more economical to make it good rather than demolished.

The building also has historical importance as it was H H Martyns who made historical furniture and metal works for the Titanic, the Houses of Parliament, the Marble Arch gates, and Spitfire parts as a precursor to Dowty's / GE Aviation.

Other buildings in use are also perfectly serviceable even if they may need some renovation works, this is preferable to demolition.

With good design and foresight there could be a mix of residential dwellings and small businesses, such as those in Gloucester Docks, a historically industrial site which combines both to create a mixed community of apartments and businesses in the same buildings. The balance of business and dwellings should conform to the 2020 plan, with employment led regeneration at the heart. .

We feel that to retain an art community on the site is essential to the culture and well being of our town. We are the biggest art community in the area. Cheltenham does not have a thriving arts centre, for a festival town of culture this is shocking and short-sighted.

We hope that the planning committee will insist on inclusion of affordable premises suitable for us to continue our work. As well as the 21 artists currently working at the studios, we also have over 30 artists on the waiting list. It is imperative that we continue to support the artistic community in our town.

Our Open Studios exhibitions and Christmas exhibitions draw the public in to the site which in turn supports other businesses on site. Many of our visitors had no idea that we and other businesses were there, and have since returned.

In the words of Carl Jung -

"The artist lives on the border between chaos and order. The artist chooses to live farther into chaos than the good citizen, and tames that chaos, by dreaming, so that the good citizen can start to feel comfortable there, in the bright daylight hours.

This process occurs in a microcosmic manner when the artists and the galleries and the coffee shops move into chaotic urban areas, and transform them, and render them habitable, through their creative and ill-paid work. What the artist does in decades in the city, art does over the millennia for civilization."

South Paddock
Sevenhampton, Cheltenham
GL54 5SW

Comments: 31st January 2022

I am writing to object to the plans to demolish Lansdown Studios.

As a gallery owner I have been visiting the thriving art studios for nearly 15 years. Work from these studios is sold locally, throughout the UK and internationally. It is sold at exhibitions and art fairs and by post. According to www.payingartists.org.uk, the visual arts contribute 1.9 billion pounds/year to the UK economy.

The building, despite its age, provides much needed affordable space and is an engine room of creativity. As a testament to how studio space is such short supply, occupancy is nearly always 100%.

Artist's cannot simply work from home, they need a dedicated space to paint and print. They benefit from working alongside other creatives and bouncing ideas off each other.

Cheltenham, as a town, is well known for its festivals in science, music and literature but its visual art scene has, in the past, lagged behind and has enormous potential to grow. Lansdown Studios is now very well established as a hub of creativity and destination for visual arts and has developed a culture of sharing, networking and employment for the 21 artists who work there. It would be a disaster and a tragedy to break up this valuable community which has collectively made so many creative, economic and social contributions to the town, through 'Cheltenham Open Studios' event for example.

It is proven that artist studio's in other cities in the UK are highly valued by their local authorities who recognise the need to be proactive in working in partnership with them. They are known to enrich their environment and attract other businesses such as cafe's and breweries and this is indeed the case in Lansdown. Would these other businesses be de-valued if Lansdown was demolished and have to re-locate as well?

I think the applicant is missing a huge opportunity for brand value by demolishing what is not simply an old building but a thriving community. Leave the building where it is and keep a valuable cultural resource. There are so many opportunities for growth and partnership which could be missed if you allow this application to go through.

7 Jacobs Close
Tetbury
GL8 8RE

Comments: 24th April 2022

It is clear to me that the designation of the Estate, as a whole is for industrial led redevelopment, with some housing. That to me implies that there, is not so much as any industrial part of the site to which the application refer, so there is conflict with the designation.

Also there is no suggestion of any S106 being put forward that could link, the development of the remaining part of the site in an agreed timescale, and quality for new/refurbished industrial, that could make it to be regarded, as an industrial led proposal, that would also see some industrial being retained on the part of of the Estate, now being proposed for development.

I do have my doubts regarding the indicative plans submitted, and and am not convinced that number of units, could be satisfactorily fitted onto the site.

Finally, I cannot recall seeing reference to Affordable Housing, but may have missed it. I do however note, that with the normal 'discount', and potential contamination land, the number of Affordable Housing, will be limited.

Comments: 4th April 2022

I view large applications. On a few occasions, I do make comments, if I feel there is something I want to be considered.

I have read the Planning Statement, and have viewed the key plans, that I realise are indicative only.

I acknowledge the allocation for employment led redevelopment/refurbishment reference, with some residential.

I note what is said about the vacancy level, on the northern part of the site. Overall, I do not consider that this development can be said to be employment led, with some residential. To me that would mean the northern part of the site, would also include some a significant level of employment. Therefore, I do see a conflict with policy.

If you disagree with me, and conclude on balance that the overall need for more housing supply, including affordable, does warrant approval of the split. Then I would suggest that you do the following:

1. Enter a S106 agreement committing the owners, of the remaining part of the site to commit to refurbishment, plus any redevelopment over an agreed period. If you feel the best option, is also specify a set monetary minimum amount, that would make sense..
2. Any sum set aside, is not included in the viability appraisal for the Market and Affordable Housing..
3. You look again at the number of units, and open space provision. To me the number of units does look high, and shared open space low.
4. I note what is said about parking provision, please check notional provision, that I realise will be a reserved matter.
5. The Section 106 agreement, should also include, Affordable Housing provision, Education and Library contributions, and any traffic related matters, external to the site.

97 Naunton Crescent
Cheltenham
Gloucestershire
GL53 7BE

Comments: 31st January 2022

Re planning submission 21/02832/OUT.

I do not have a studio at the Lansdown Art Centre so from that point of view I am a neutral observer.

However, as chair of the Gardens Gallery, a community based art gallery where local artists can exhibit their work, I do object to the whole proposal.

The arts scene in Cheltenham is hanging by its fingertips. The facilities for artists are extremely limited, and to lose the largest facility for locals would be a very detrimental step.

Cheltenham is rightly known for its festivals, Literature, music, food etc. but these are short term intense (and in tents) events. They bring in outside contributors and outside audiences but those people are not here 52 weeks a year.

This community of artists are here the whole time in the cold and the heat, producing work for themselves and to be exhibited to the wider community. To lose this facility will make Cheltenham a poorer place. A town without a full-time cultural heart becomes a wasteland. You might as well demolish the beautiful Georgian houses that grace this town and replace them with multi-storey concrete boxes.

Thank you for considering my objection

1 Compton Farm Cottages
Compton Abdale
Cheltenham
GL54 4DL

Comments: 28th January 2022

I moved to the area in early 2021. The main reason I chose to live here was the thriving creative and art culture. To me it showed a council and community who saw the need for investment and support in all the arts.

The independent businesses in Cheltenham; the shops, the galleries and the artistic community show a town diverse and proud of its festivals and cultural events.

So after moving here I was not surprised to discover Lansdown Art Studios in the Lansdown Industrial Estate.

My small studio in Lansdown is invaluable to me as I can't work from home.

I'm extremely disappointed to hear this Cheltenham asset could be lost. There is nothing like it nearby and it should be championed not removed.

10 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 31st January 2022

I object to planning application 21/02832/OUT for a number of reasons.

The proposed change of use from existing employment on part of the Lansdown Industrial site to 100% residential does not comply with the Cheltenham Local Plan 2020 and, in particular, fails to satisfy the requirements of Policy EM2, notably:

1. the proposed use of 215 dwellings is not job generating and the loss of employment will not be offset by a net gain in the quality and/ or number of jobs provided on the site as the southern end of the Lansdown site is already fully populated with active businesses.
2. There is no evidence of a sustained and long-term absence of economic activity. There are at least 15+ small and medium-sized business which will be affected by loss of premises and potential loss of employment if this application goes ahead.
3. There is also a thriving Lansdown Art Studios complex in which 21 artists work and for many their livelihood will be impacted if they are unable to carry on with their creative endeavours.
4. The proposed development of the site does not make provision for relocation of an existing business to another suitable location within the Borough. No proposals have been made to relocate the Art Studios or other businesses which will potentially be affected.

I am one of the artists working at the Lansdown Art Studios. This is the largest artistic community in Cheltenham. I value greatly this community, one which is inspiring and supportive, and also the space itself as I do not have room at home in which to work. There is a shortage of suitable art spaces in Cheltenham, not just affordable spaces but any spaces at all. The long waiting list for vacancies at the Lansdown Art Studios is testament to this.

Lansdown Art Studios add to the rich variety of creativity and culture within Cheltenham and should be protected and not destroyed. The Studios were recently awarded a Borough Council Community Pride grant of £1,250, supported by Councillor Flo Clucas and the Mayor of Cheltenham, towards the creation of a mural on the outside of the building, a sign of confidence in the Studios' active contribution to the community.

The Studios also hold exhibitions, offering visitors an insight into working art studios as well as generating revenue for the community, and additionally support the revenue of other galleries in the area by exhibiting the work of the artists at those venues.

There may be some scope for some limited residential development on the edge of the site; however, redeveloping half of the existing commercial site for residential use only does not meet the conditions set out in the 2020 Local Plan and serves only to satisfy the profit objectives of the current landlord, Cheshire West & Chester Council, with no allegiance to Cheltenham, its' communities or Cheltenham's support of its' Arts.

I trust that this application is considered with care given to the interests of the occupants of both the Lansdown Art Studios as well as all the businesses potentially affected in remaining on this site, and that any future redevelopment plan makes provision for affordable alternative premises.

3 The Wharf
Coombe hill
Gloucester
GL19 4BB

Comments: 3rd February 2022

The Art studio is where I spend many hours, creating my art work and making stock for my small business. Without it I have no work-space. It is the perfect place to work and be a part of something larger than myself. It is a hub of communication and a part of a very exciting and productive group of small businesses, working together and providing various services for this area of Cheltenham.

The Art studios are a one-off in Cheltenham and to lose this would be sad for me personally and our close group of supportive artists, but also for the wider community of which I feel we are an important part.

Association for Industrial
Archaeology
The Ironbridge Institute,
Ironbridge Gorge Museum
Coalbrookdale, Telford
TF8 7DX

Comments: 30th September 2022

The Association for Industrial Archaeology notes that this outline application is for the demolition of the existing buildings and the redevelopment of the northern part of the Lansdown Industrial Estate. The redevelopment proposal is for up to 215 dwellings with associated access roads, parking and public open space. Further to the Association's initial comments, it is has been brought to their attention that Building 11 (also referred to as block C) appears to have a very early block and beam/beam and pot concrete floor. In the Heritage Appraisal Building 11 is dealt with on pages 49 to 51, and although there is reference to a steel frame and internally very deep steel beams, there appears to have been no further investigation of the construction. If it is of this construction, then it would appear to be an early example if the building was constructed at the earlier end of the suggested date range (1907-1921). Perhaps this could be clarified.

Planning Casework Officer,
Association for Industrial Archaeology

Laburnum Cottage, Parkend
Walk,
Coalway
Coleford
GL16 7JR

Comments: 31st January 2022

Although not a resident of Cheltenham, I frequently visit the town to enjoy the cultural activities and events on offer. I was dismayed, therefore, to hear that the proposed redevelopment of the Lansdown industrial estate would involve the demolition of the Lansdown Art Studios, and with it the destruction of a thriving community of 21 artists who contribute enormously to the cultural richness of the town.

I also understand that the redevelopment will mean not only the loss of the art studios but also many other small and medium sized businesses on the site.

I wish to strongly object to the proposal.



7th February 2022

For the attention of Ms Lucy White
Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucester
GL50 1PP

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720

enquiries@v3manufacturing.com

Dear Sirs

Reference: 21/02832/OUT - Outline application for the redevelopment of the northern part of Lansdown Industrial Estate

I write in connection with the above as set out in your letter of 19th January 2022.

Firstly, I would like to reiterate the general disappointment that we expressed as part of the consultation process with the Landlords representatives in August 2021 (copy attached), that the plans are under consideration for a scheme that will result in the reduction of industrial space in favour of residential on this site. Commercial space in Cheltenham is already at a premium with high demand, and this will be detrimental to the protection of employment in the local area.

Having now studied in detail the various documents submitted in relation to the application, please find set out below, a number of specific points of concern we would ask to be addressed as part of the planning process.

Access and Public Safety

Have the Public Protection Team been consulted on this scheme ?

Specifically has a health and safety assessment been undertaken of the risks presented by an increased volume in pedestrians and cyclists ? The proposed pedestrian and cyclist access route is through an area of high industrial traffic, including heavy goods vehicles and fork lift trucks as well as busses in the main entrance area from the Gloucester Road. This is particularly concerning bearing in mind a high number of these pedestrians and cyclists are likely to be children who will be tempted to use the area as an extended playground and bike park ? What improvements to the Gloucester Road access and additional provision for HGV turning points are being considered, if vehicular access to the remaining industrial units is reduced through the removal of access from Rowanfield Road ? We raise this particularly as it is our understanding that this entrance is owned by ABC Motors with a legal easement / automatic statutory declaration attached to it.

Please find attached a number of photographs demonstrating the already congested nature of heavy goods vehicles, fork lift trucks and general site traffic in this area. This will be further exacerbated if space is lost for vehicular access in the provision of additional pedestrian walkways and cycle paths.

Noise & Odors

Has a noise impact assessment been undertaken ?

The V3 unit has a compressor sited 1 metre from proposed garden boundaries. This compressor can operate 24/7 during peak production periods. Due to the intermittent nature of demand it will be also be more noticeable than something with a constant background noise.



- What provisions is it proposed will be put in place around screening and noise insulation to ensure that industrial tenants do not face a continual barrage of residents' complaints on noise, odours and impact on their outlook that there will practically be very little they can do to improve, and actually shouldn't have to do, when occupying an industrial unit that permits B1, B2 and B8 use ?
- We have created more than 25 new jobs on our site over the last year, and demand for our products from this site is high. We need to be able to continue for the purpose we entered into a lease on, and without risk of restrictions on our operating hours and processes being imposed in the future.

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720
enquiries@v3manufacturing.com

Parking

- Have the Council Highways Team been consulted on the proposals ?
- The Travel Plan included in the application documents implies that there is a proposal to reduce from the standard CBC recommendations, the ratio of parking for each size of dwelling. If this is accepted, how is it proposed to manage and police the excess cars in the vicinity and ensure that they do not overspill onto the remaining industrial area of the estate further exacerbating the already challenging parking, access, safety and security issues referenced above ?

Site Security

- How is it proposed that security will be maintained in the remaining industrial area which is currently managed through gates at the main access points that are locked to the general public between 21/2200 hrs and 0600 hrs daily ?

Flood Risk

- The planning documents include a report on the flood risks for the new development area that has identified a risk of ground and surface water flooding for which there appear to be plans to mitigate and manage. Please advise what mitigation measures will be undertaken to manage ground and surface water in the remaining industrial units area due to the reduction of impermeable surfaces from the new development, and the risk of excess water seeping into the neighbouring area ?

If you would like to discuss or require further information on any of the points raised above, we are very much available to speak or to meet in person on site.

Yours faithfully



Director

CC: ccl.sandra.holiday@cheltenham.gov.uk & cll.richard.pineger@cheltenham.gov.uk

Attachments:

- Schedule 1: Copy of Letter submitted to L/L Consultation Process
- Schedule 2: Photographs Demonstrated Parking and HGV Congestion



19/08/2021

Lansdown North Consultation Team
Camargue
Eagle Tower
Cheltenham
GL50 1TA

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720

enquiries@v3manufacturing.com

Dear Sirs

Ref : Lansdown Industrial Estate Northern Development Proposal

I write on behalf of a group of commercial and industrial tenants on the Lansdown Industrial Estate, who have recently been made aware of the proposals for the redevelopment to residential housing of the northern part of the estate.

Firstly, I would like to express our general disappointment that the plans are under consideration for a scheme that will result in the reduction of industrial space in favour of residential on this site, and how this may impact on the protection of employment in the local area.

Having now had an opportunity to study in detail the outline plans, I set out below a number of specific points and concerns that we would like be taken into account as part of the consultation process, which is due to conclude on 23rd August:

Access to and from the estate is already severely limited and the proposals to reduce further will have a severe impact on businesses operating, and access for emergency services

Parking on the estate is already at a premium with the cars of staff already employed by existing tenants having to park on areas outside of allocated and communal parking zones during the normal working week. With 218 new homes added to the site, even with resident parking bays included within the plans, this will almost certainly result in a significant increase in the number of additional cars in the area and will become untenable for industrial tenants.

Industrial units on the estate currently have permission for various uses, but are predominantly B1, B2 and B8 use which include light and general industrial and warehousing. Our understanding is that nothing in the outline plans can dilute the permissions that ourselves and neighbouring tenants have already been granted to continue to run our operations which may on occasions result in 24 hour and 7 day working.

Industrial and such close residential occupants are never going to make particularly harmonious neighbours due to noise, odours, less than aesthetically pleasing views and unsociable operating hours. In respect of V3's own leased area, the current plans show our compressor house and smoking area 1 metre from proposed garden boundaries. All of this can cause friction between individuals, and we do not want to be faced with the prospect of responding to a continual barrage of residents' complaints that there will practically be very little we can do to improve, and actually shouldn't have to do, having entered into a lease that permits us B1, B2 and B8 use.



- Increased pedestrian activity, much of which is likely to be children, will create major health and safety issues for traffic visiting the industrial units, much of which is heavy goods vehicles and who on occasions operate 24/7. There is no space available to increase pedestrian/cycling thoroughfares
- Increased on street parking and in unauthorised areas in the vicinity of the industrial units will present an additional access risk for emergency vehicles.
- A significant increase in pedestrian activity is also likely to result in increased crime levels and present a much higher security risk for individual industrial tenants.

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720
enquiries@v3manufacturing.com

We are more than happy to meet to learn how these significant concerns will be addressed and look forward to hearing from you shortly.

Yours sincerely

[Redacted signature]

[Redacted name]
Director
V3 Manufacturing Limited

Cc D [Redacted]















Name	City	State	Postal Code	Country	Date	Comment
	Woodman	England	GL52 9qw	UK	#####	"It is a rare venue where artists can create and inspire each other . Not only that but public also get to view their work at social open gallery exhibitions. This is a real pleasure"
	Cheltenham	England	GL503QN	UK	#####	"As an artist in Cheltenham, the Lansdown Art Studios offers a serviceable, affordable and suitable space for a community of 21 artists.Affordable rent for working artists is 1
	Cheltenham	England	GL503QN	UK	#####	"As an artist in Cheltenham, the Lansdown Art Studios offers a serviceable, affordable and suitable space for a community of 21 artists.Affordable rent for working artists is 1
	Cardiff	Wales; Cyn	Cf14 1hl	UK	#####	"It provides a rare opportunity for artists to work together"
	CHELTEHNH	England	GL52 5AA	UK	#####	"There are so few studios of this caliber and space to develop creativity."
	Bristol	England	Bs16 9ey	UK	#####	"Working towards a community of artists will support a diverse and inclusive community forevermore."
	Wells	England	BA4 4RH	UK	#####	"Art is at the heart of a healthy future"
	Cheltenham	England	GL51 9JB	UK	#####	"We need more space where artists of all genres can display their work. Cheltenham is a hot spot for art and artists, we should be encouraging more. Making more space"
	Birmingham	England	b356pb	UK	#####	"It is important"
	Devizes	England	SN10	UK	#####	"These studios are housing businesses and employing people who need work premises"
	Beckton		E6	UK	#####	"Please help me. Please sign and share my petition.https://www.change.org/InvestmentScams"
	Bushley Gr	England	GL20 6JB	UK	#####	"A friend who is a professional arts has recommended that they be saved"
	Cheltenham	England	GL51	UK	#####	"Katie Radcliffe"
	Cheltenham	England	GL537be	UK	#####	"Although I dont have a studio at Lansdown I recognise the vital importance that Art and Creativity has in todays society"
	Charlton Ki	England	GL53 8BS	UK	#####	"Artists have been renting the space for years and offering much to Cheltenham's artistic community...to find an equivalent building will be very difficult"
	Stonehouse	England	GL10 3QH	UK	#####	"It's vital that artists have a collective space to work and share ideas.Cheltenham Art Studios enrich the cultural life of Cheltenham."
	Withington	England	GL54	UK	#####	"This is a thriving community of high quality and emerging artists who would otherwise struggle to afford suitable spaces. Leave the studios alone!"
	Cheltenham	England	gl51 6ue	UK	#####	"These studios are a vital space for artists and the arts are vital for a fully-formed, functional society."
	Gloucester	England	GL4 8HR	UK	#####	"The Arts are always under threat, yet Art contributes so much to our wellbeing and to our economy. What problems will society face in future years when there is housing i
	Liskeard	England	PL14	UK	#####	"I feel it would be a great loss to the artistic community in Cheltenham. We don't need more houses we need more space for small business to create jobs and diversify in t
	Penarth	Wales; Cyn	CF64	UK	#####	"The studios are an artistic heartbeat."
	Penarth	Wales; Cyn	CF642TG	UK	#####	"Art is really important to everyone it's enjoyable relaxing and creativity is good for mental health. Studios must be preserved to help maintain the practice and growth of ar
	Cheltenham	England	GL51 8ND	UK	#####	"I love art. Simple."
	Stockport	England	Sk3 8hs	UK	#####	"Community projects are essential. Why take that away?"
	Cheltenham	England	gl53 7ex	UK	#####	"I've attended classes there, and it's a diverse and thriving artists community."
	Haslemere	England	GU27	UK	#####	"Art is fundamental to our society and Cheltenham has vast support for its festivals, but the visual arts needs the same level of support. With the possible demolition of Lanc
	Haslemere	England	GU27	UK	#####	"Art is fundamental to our society and Cheltenham has vast support for its festivals, but the visual arts needs the same level of support. With the possible demolition of Lanc
	Bristol	England	Bs4 4rn	UK	#####	"We should be enabling artists to be part of a community not excluding them"
	Bourton-or	England	GL542LB	UK	#####	"Art spaces are the mark of civilisation."
	Cheltenham	England	GL51	UK	#####	"Economic studio space is needed in Cheltenham if it is to be seen as an artistic , cultured town."
	Cheltenham	England	GL52 6TQ	UK	#####	"The arts are important to our town."
	Cheltenham	England	GI50 2LT	UK	#####	"It is such a shame to see a creative space that provides benefit to so many under threat. These places are very scarce as it is and so important for people of all ages to be at
	Hartpury	England	GL19	UK	#####	"I am an art lover and our local artists deserve our support."
	ak			UK	#####	"Optional"
	gloucesters	England	gl503bl	UK	#####	"Everywhere needs artists to survive and flourish regardless of their finances."
	Gloucester	England	GL4 6UB	UK	#####	"Our community needs this"
	CHELTEHNH	England	GL52 3LW	UK	#####	"Art is vital to any community - now, more than ever, we need to support our artists."
	Cheltenham	England	GL504JN	UK	#####	"We need to keep this studio in oir community."
	Wrocław			Poland	#####	"I'm signing because it's important"
	Oxford	England	ox4 1nl	UK	#####	"Many talented artists use the studio and would find it difficult to work and promote their art elsewhere."
	Amersham		HP6	UK	#####	"I'm signing this petition because there is a lack of studio space as it is. There are hardly no community buildings left for people to have a recreation time out. So find some
	Bath	England	BA1 3RR	UK	#####	"Any art working space is so valuable and contribute so much to mental health."
	Cheltenham	England	GL53	UK	#####	"A wonderful inspirational place that should definitely continue to thrive right here in Cheltenham"
	Gloucester	England	GL2 4UD	UK	#####	"The Arts need all the help they can muster, Glad to help in any way."
	Norwich	England	NR95RT	UK	#####	"It sounds like a wonderful place to be creativew with like minded people which is so important especially right now"

e success of the redeveloped south side of the estate is testimonial to what could be achieved on the north side. However in paragraph 2.3 the proposal dismisses this as unachievable for the North side which is not true. With mixed sized and success of the redeveloped south side of the estate is testimonial to what could be achieved on the north side. However in paragraph 2.3 the proposal dismisses this as unachievable for the North side which is not true. With mixed sized and st

suitably considered designs and redevelopment, the North side of the estate can achieve as much success as the already d
sitably considered designs and redevelopment, the North side of the estate can achieve as much success as the already deve

Name	City	State	Postal Code	Country	Signed On
				UK	#####
	Cheltenham	England	GL52	UK	#####
	Gloucester		GL3	UK	#####
	Woodmanco	England	GL52 9qw	UK	#####
	Birmingham	England	B24	UK	#####
	Stroud		GL6	UK	#####
	Cheltenham	England	GL503QN	UK	#####
	Cheltenham	England	GL51	UK	#####
	g Finchley	England	N209AR	UK	#####
	Exeter		EX2	UK	#####
	Cheltenham	England	GL50	UK	#####
	r Bristol	England	BS36	UK	#####
	Gloucester		GL1	UK	#####
	Cheltenham	England	GL503ED	UK	#####
	Cheltenham	England	GL52 6YR	UK	#####
	Leeds	England	LS11	UK	#####
	STROUD	England	GL5 4EJ	UK	#####
	Cheltenham	England	GL50 3HW	UK	#####
	r Gloucester		GL4	UK	#####
	Cheltenham	England	GL52	UK	#####
	Cheltenham	England	GL50	UK	#####
	e Bristol	England	BS15	UK	#####
	s Cardiff	Wales; Cym	Cf14 1hl	UK	#####
	er Cheltenham	England	GL50	UK	#####
	Cheltenham	England	GL51 6LG	UK	#####
	Cheltenham	England	GL52 5NE	UK	#####
	CHELTENHAM	England	GL52 5AA	UK	#####
	o Cheltenham		GI54 eqq	UK	#####
	er St Albans	England	AI23sr	UK	#####
	Cheltenham	England	GL51	UK	#####
	Cheltenham	England	GL50	UK	#####
	Gloucester		GL4	UK	#####
	Cheltenham	England	GL50	UK	#####
	Gloucester		GI4	UK	#####
	Cheltenham	England	GL53	UK	#####
	Cheltenham	England	GL52	UK	#####
	Saffron Walc	England	Cb101by	UK	#####
	Cambridge		CB3	UK	#####
	Tiverton	England	EX16	UK	#####
	Bristol	England	Bs16 9ey	UK	#####
	a Christchurch	England	BH23	UK	#####
	Haverfordwe	Wales; Cym	SA62 5SS	UK	#####
	Wareham	England	BH20 7NH	UK	#####
	Cheltenham	England	GL50 4SA	UK	#####
	n London	England	SE1 7RB	UK	#####
	Cheltenham	England	GL53 9JN	UK	#####
	Wells	England	BA4 4RH	UK	#####
	Cheltenham	England	GL51 9JB	UK	#####
	Birmingham	England	b356pb	UK	#####

Chippenham	England	SN15	UK	#####
Balham	England	SW12	UK	#####
Cheltenham	England	GL52 8HP	UK	#####
Cannock	England	WS12	UK	#####
London	England	Se5 7Is	UK	#####
Neyland	Wales; Cym	SA73	UK	#####
Cheltenham	England	GL51	UK	#####
Bristol		BS6	UK	#####
Tewkesbury	England	GL20	UK	#####
Cheltenham	England	GL53 0PU	UK	#####
Devizes	England	SN10	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL53	UK	#####
Beckton		E6	UK	#####
Saint Neots	England	PE19	UK	#####
Cheltenham	England	GL52 6YJ	UK	#####
Kettering	England	NN15	UK	#####
London	England	e2 6jl	UK	#####
Cheltenham	England	GL53 8NQ	UK	#####
Hackney		E2	UK	#####
Hornsey		N8	UK	#####
Leicester		LE8	UK	#####
Cheltenham	England	GI53 7BE	UK	#####
Stroud		GL5	UK	#####
Cheltenham	England	GL51	UK	#####
CHELTENHAM	England	GL50 2NG	UK	#####
Bodenham		HR1	UK	#####
Gloucester		GL4	UK	#####
London		EC4N	UK	#####
Cheltenham	England	GL53	UK	#####
Bushley Green	England	GL20 6JB	UK	#####
Alderton	England	GL20	UK	#####
Cheltenham	England	GL51 9LL	UK	#####
Cheltenham	England	GL51	UK	#####
Cheltenham	England	GL537be	UK	#####
Trowbridge	England	BA14	UK	#####
Worcester	England	WR6 5PP	UK	#####
Cheltenham	England	GL53 7LS	UK	#####
Cheltenham	England	GL53	UK	#####
Barnsley	England	S70	UK	#####
Charlton Kings	England	GL53 8BS	UK	#####
Cheltenham	England	GL54	UK	#####
Worcester		WR5	UK	#####
Bordon	England	GU35	UK	#####
Worcester		WR3	UK	#####
London	England	Sw12 9Is	UK	#####
Stonehouse	England	GL10 3QH	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL53	UK	#####

us Hayle	England	TR27 4PX	UK	#####
Worcester	England	WR1 1UA	UK	#####
Cheltenham	England	GL52	UK	#####
GLOUCESTER	England	GL4 6QL	UK	#####
Withington	England	GL54	UK	#####
Cheltenham	England	gl51 6ue	UK	#####
Gloucester		GL4	UK	#####
London	England	SE17	UK	#####
		pr44gr	UK	#####
Cheltenham	England	GL52	UK	#####
Cheltenham	England	GL53	UK	#####
Glis	England	GI569AD	UK	#####
k Bredon	England	GL207NJ	UK	#####
Bourton On	England	GL54	UK	#####
Tewkesbury	England	GL20	UK	#####
Gloucester	England	GL4 8HR	UK	#####
Edinburgh		Eh11 2rz	UK	#####
Gloucester		GL4	UK	#####
Gloucester	England	GL2 0SA	UK	#####
Brighton		BN3	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL51	UK	#####
Cheltenham		GL50 4RJ	St. Lucia	#####
Cheltenham	England	GL51	UK	#####
t Gloucester	England	GL4 8HB	UK	#####
Cheltenham	England	GL52	UK	#####
Stroud		GL5	UK	#####
CHELTENHAM	England	GL51 6LN	UK	#####
Gloucester		GL4	UK	#####
Stanmore		HA7	UK	#####
Evesham	England	WR11 8RX	UK	#####
te Cheltenham	England	GL52	UK	#####
g Cheltenham	England	GL52	UK	#####
Cheltenham	England	GL53	UK	#####
g Gloucester	England	GL1 5EB	UK	#####
Liskeard	England	PL14	UK	#####
Bristol		BS6	UK	#####
Cheltenham	England	GL50	UK	#####
Bristol	England	BS35	UK	#####
Stanmore		HA7	UK	#####
Yate	England	BS37	UK	#####
Gloucester	England	GL4 3AN	UK	#####
Cheltenham	England	GI503lu	UK	#####
gloucester		gl4	UK	#####
a Cheltenham	England	GL53	UK	#####
Cheltenham	England	gl52 6px	UK	#####
Cheltenham	England	GL50	UK	#####
r Cheltenham	England	GL52 2px	UK	#####
Winchmore	England	N21	UK	#####
ll Malvern	England	WR14 4BB	UK	#####

on			UK	#####
Cheltenham	England	GL51 7JR	UK	#####
Gateshead		NE9	UK	#####
Addlestone	England	KT15	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL50	UK	#####
Penarth	Wales; Cym	CF64	UK	#####
Milhac de Nontron		24470	France	#####
Penarth	Wales; Cym	CF642TG	UK	#####
Cheltenham	England	GL50	UK	#####
Cardiff	Wales; Cym	CF14	UK	#####
West Bromw	England	B70	UK	#####
Evesham	England	WR11	UK	#####
Devizes	England	SN10 1QA	UK	#####
Dundry	England	BS41 8LP	UK	#####
Edgware		HA8	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL51	UK	#####
Bristol		BS9	UK	#####
Gloucester		GL4	UK	#####
Lewes	England	BN7 1BD	UK	#####
Gloucesters	England	gl50 4gg	UK	#####
Coleford	England	GL16	UK	#####
Wisbech	England	PE13	UK	#####
Cheltenham	England	GL51 8ND	UK	#####
Aberdare	Wales; Cym	CF44 0NH	UK	#####
Colchester		CO2	UK	#####
Cheltenham	England	GL54	UK	#####
Dyffryn Ardu	Wales; Cym	LL44	UK	#####
Cheltenham	England	GL51	UK	#####
n Cheltenham	England	GL51	UK	#####
s Cheltenham	England	GL53	UK	#####
Wells	England	BA5 2QF	UK	#####
Clavering	England	CB11	UK	#####
Cheltenham	England	GL52	UK	#####
a Cheltenham	England	GL51	UK	#####
Oxford		OX3	UK	#####
Maghera	Northern Ire	BT46 5BP	UK	#####
Stockport	England	Sk3 8hs	UK	#####
gloucestersh	England	gl545qt	UK	#####
Salisbury		SP1	UK	#####
Cheltenham	England	GL52	UK	#####
c Bristol	England	BS15	UK	#####
Cheltenham	England	GL51	UK	#####
NA		GL5	UK	#####
Gloucester		GL4	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL52	UK	#####
cheltenham	England	gl53 7ex	UK	#####

Saffron Walc	England	CB10	UK	#####
Cirencester	England	gl7 2hn	UK	#####
Cheltenham	England	GL52 9PX	UK	#####
Tewkesbury	England	GL20	UK	#####
Fairford		GL7	UK	#####
Bishops Clee	England	GL528BS	UK	#####
Bristol		BS5	UK	#####
Cheltenham	England	GL53	UK	#####
Gloucester		GL3	UK	#####
Gloucester		GL4	UK	#####
Tewkesbury	England	GL20	UK	#####
Weston-sup	England	BS22	UK	#####
Malvern	England	Wr144al	UK	#####
Glouc	England	GI53	UK	#####
Cheltenham	England	GL50 2UG	UK	#####
Bridport	England	DT6 3JH	UK	#####
y Haslemere	England	GU27	UK	#####
m Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL52	UK	#####
Cheltenham	England	SN15	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL50 2QH	UK	#####
Cheltenham	England	GL52	UK	#####
n Stockport		SK1	UK	#####
Cheltenham	England	GL51	UK	#####
Perth		6000	Australia	#####
London	England	E14	UK	#####
Bristol	England	Bs4 4rn	UK	#####
Cheltenham	England	gl53 7hj	UK	#####
Cheltenham	England	GL52	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL52 8EW	UK	#####
Cheltenham	England	gl50 4hg	UK	#####
Gloucester		GL4	UK	#####
Cheltenham	England	GL52	UK	#####
Bourton on t	England	GL54	UK	#####
Cheltenham	England	GL50	UK	#####
Bourton-on-i	England	GL542LB	UK	#####
Cricklade		SN6	UK	#####
Cheltenham	England	GL53	UK	#####
Cheltenham	England	GL50 2JT	UK	#####
Swindon		SN2	UK	#####
Croydon	England	Cr81an	UK	#####
Ackworth	England	WF7 7AF	UK	#####
n Tewkesbury	England	GL20	UK	#####
Victoria		V9A	Canada	#####
Stroud		GL5	UK	#####
Gloucester		GL2	UK	#####
Gloucester		GL4	UK	#####
Tewkesbury	England	GL20	UK	#####

Cheltenham	England	GI526TS	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL52	UK	#####
Gloucester		GL4	UK	#####
Cricklade		SN6	UK	#####
ir Glos	England	GL6 6DA	UK	#####
Swindon		SN2	UK	#####
Worcester		WR4	UK	#####
Clapham		SW4	UK	#####
Cheltenham	England	GL50	UK	#####
Norton		GL2	UK	#####
Cheltenham	England	GL545TH	UK	#####
Cheltenham	England	GL50 4JN	UK	#####
Cheltenham	England	GL502SD	UK	#####
Cheltenham	England	GL51	UK	#####
Cheltenham	England	GL53	UK	#####
Edinburgh		EH1	Iran	#####
Cheltenham	England	GL53	UK	#####
		5107	Australia	#####
Monmouth	Wales; Cym	NP25	UK	#####
Cheltenham	England	GL52 6TQ	UK	#####
c Johannesburg		5070	South Afric	#####
Cheltenham	England	GL50 4JP	UK	#####
Gloucester		GL2	UK	#####
Faringdon	England	SN7 7FZ	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GI50 2LT	UK	#####
n Cheltenham	England	GL50 4 JP	UK	#####
r Cheltenham	England	GL51	UK	#####
Stroud		GL5	UK	#####
Gloucester		GL3	UK	#####
Cirencester	England	SN16	UK	#####
Cheltenham	England	GL50	UK	#####
Chelt	England	GI526qe	UK	#####
y Bourton on t	England	GL54	UK	#####
West Ilsley	England	RG20 7AJ	UK	#####
Alnwick	England	NE66	UK	#####
s Gloucester		GL2	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL52	UK	#####
g: Cheltenham	England	GL53	UK	#####
Gloucester		GL1	UK	#####
Tewkesbury	England	GL20	UK	#####
Stratford-up	England	CV37	UK	#####
t Putney		2112	Australia	#####
Manchester	England	M27	UK	#####
c London	England	W14	UK	#####
London		NW1 9YA	UK	#####
			UK	#####
gloucestersh	England	gl503bl	UK	#####

Chiswick	W4	UK	#####
Cheltenham England	GL50	UK	#####
London SE	SE	UK	#####
Gloucester England	GL4 6UB	UK	#####
Colombo	100	Sri Lanka	#####
Cheltenham England	GL50	UK	#####
Cheltenham England	RH9AJ	UK	#####
Cheltenham England	GL51	UK	#####
Cheltenham England	gl50 2nt	UK	#####
Royal Leamir England	CV31	UK	#####
Cheltenham England	GL52	UK	#####
Sutton	SM1	UK	#####
gloucester	GL2	UK	#####
CHELTENHAM England	GL502NU	UK	#####
Birmingham	B43	UK	#####
Cheltenham England	GL50 4DD	UK	#####
CHELTENHAM England	GL52 3LW	UK	#####
Scarborough England	YO14	UK	#####
Gloucester	GL3	UK	#####
Cheltenham England	GL50	UK	#####
Cheltenham England	GL53	UK	#####
Gloucester	GL2	UK	#####
Woking England	GU22	UK	#####
Wincanton	BA9	UK	#####
Cheltenham England	GL504JN	UK	#####
Cheltenham England	GL50	UK	#####
Cheltenham England	GL50	UK	#####
Wrocław		Poland	#####
Birmingham England	B15	UK	#####
Oxford England	ox4 1nl	UK	#####
		New Zealand	#####
Hull	HU5	UK	#####
Stoke-on-trent	ST7	UK	#####
Paisley	PA2	UK	#####
Cheltenham England	GL52	UK	#####
Liverpool	L15	UK	#####
Amersham	HP6	UK	#####
Castle Cary	BA7	UK	#####
Cheltenham England	GL51	UK	#####
Newport	NP19	UK	#####
BELFAST	BT6 9BJ	UK	#####
Christchurch		New Zealand	#####
Gloucester	GL4	UK	#####
Cheltenham England	GL54 5EY	UK	#####
Stroud	GL5	UK	#####
london	e5	UK	#####
Cleveleys	FY5	UK	#####
Cheltenham England	GL53	UK	#####
Kensington	SW7	UK	#####
Swindon	SN2	UK	#####

	Cheltenham England	GL50	UK	#####
	Gloucester	GL4	UK	#####
	Islington	EC1P	UK	#####
	Cheltenham England	GL50	UK	#####
ki	Cheltenham England	GL54	UK	#####
	Cheltenham England	GL52	UK	#####
	Cheltenham England	GL50	UK	#####
	Tewkesbury England	GL20	UK	#####
	Cheltenham England	GL52	UK	#####
lle	Birmingham England	B25	UK	#####
	Twickenham	TW2	UK	#####
	Taipei		UK	#####
	Cheltenham England	GL51	UK	#####
a	Oxford	OX4	UK	#####
	Bicester England	OX7 7Bs	UK	#####
	Cheltenham England	GL53	UK	#####
	London	N4	UK	#####
	Coventry	CV1	UK	#####
	Cheltenham England	GL50 2LT	UK	#####
ns	Biggin Hill	Tn16 3xt	UK	#####
	Norwood	SE19	UK	#####
elc	Wigan	WN1	UK	#####
	London	EC4N	UK	#####
	Brooklyn New York		US	#####
	Hornsey	N8	UK	#####
	Cheltenham England	GL51 7DJ	UK	#####
	Lincoln		UK	#####
	Droitwich Sp England	WR9 7BW	UK	#####
	Bristol	BS6	UK	#####
	Birmingham England	B12	UK	#####
	Cheltenham England	GL53	UK	#####
n		2995VH	Netherland	#####
	Rhoon	3162 TC	Netherland	#####
	Brighton	BN3	UK	#####
	Hornsey England	N15	UK	#####
s	Stoke-on-trent	ST4	UK	#####
	Gloucester	GL2	UK	#####
e	Gloucester	GL4	UK	#####
or	Stroud	GL5	UK	#####
	Ilkeston	DE7	UK	#####
so	Bridgend	CF31	UK	#####
	Cheltenham England	GL53	UK	#####
	Lincoln	LN4	UK	#####
	London England	W14	UK	#####
y	Peterborough	PE7	UK	#####
	Coventry	CV6	UK	#####
	Liverpool	L22	UK	#####
e	Dagenham	rm10 7tl	UK	#####
k	Pontypridd Wales; Cym	CF38	UK	#####
y	Birmingham	B23	UK	#####

Edinburgh	EH1	UK	#####
n London	OL11	UK	#####
Stroud	GL5	UK	#####
Islington	EC1P	UK	#####
Kent	TN29 ODA	UK	#####
Cheltenham England	GL54 2ND	UK	#####
s Morganstown	Cf158lp	UK	#####
telford shropshire	TF7 5na	UK	#####
Accrington	BB5	UK	#####
Bristol	BS40	UK	#####
n Southport	PR9	UK	#####
Bristol England	BS13	UK	#####
Acton	W3	UK	#####
Chippenham	Sn15 1QS	UK	#####
e Winchcombe England	GL54	UK	#####
Kenley	CR8	UK	#####
hednesford	ws12 1ap	UK	#####
Grays	RM17	UK	#####
		UK	#####
Newmarket	CB8 8RX	UK	#####
Gloucester	GL2	UK	#####
Cheltenham England	GL53	UK	#####
Maidenhead England	SL2 3BR	UK	#####
Manchester	M15 5GL	UK	#####
Cardiff Wales; Cym	CF23	UK	#####
Kidderminster England	DY14 8LT	UK	#####
Cardiff	CF15 8EZ	UK	#####
to Liverpool	L240TE	UK	#####
Glasgow	G11	UK	#####
Middlesbrough	TS3	UK	#####
di Falmouth England	TR11	UK	#####
Gloucester	GL4	UK	#####
Gloucester	GL4	UK	#####
Cardiff	CF5	UK	#####
e Cheltenham England	GI503py	UK	#####
Gloucester	GL4	UK	#####
an Maidstone England	ME15	UK	#####
w Cheltenham England	GL53	UK	#####
Cheltenham England	GL51	UK	#####
Bristol England	BS16	UK	#####
Cheltenham England	GL50	UK	#####
Walthamsto England	E17	UK	#####
Skelmersdale	WN8	UK	#####
Cirencester	GL7	UK	#####
Stroud	GL5	UK	#####
er Ramsgate England	CT11	UK	#####
Gloucester	GL4	UK	#####
Stroud	GL5	UK	#####
t Cheltenham England	GL52	UK	#####
Hythe England	CT21	UK	#####

Cheltenham	England	GL50	UK	#####
Abingdon	England	OX14	UK	#####
Gloucester		GL4	UK	#####
bedfordshire	England	lu7 4sg	UK	#####
Cheltenham	England	GL51	UK	#####
Maidstone	England	ME15	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL52	UK	#####
Alcester	England	B50	UK	#####
Cannock		WS12	UK	#####
Birmingham	England	B19	UK	#####
Cornwall	England	pl33 9dl	UK	#####
Gloucester	England	GL5 1Lw	UK	#####
Gloucester		GL4	UK	#####
Belsize Park		NW3	UK	#####
Coalway	England	GL16 7JZ	UK	#####
Cinderford	England	GL14	UK	#####
Cheltenham	England	GL50	UK	#####
Twickenham		TW2	UK	#####
Cheltenham	England	GL52	UK	#####
Cheltenham	England	GL50	UK	#####
Cheltenham	England	GL53	UK	#####
Barnstaple	England	EX31	UK	#####
Stroud	England	GL5 5Es	UK	#####
Stroud		GL5	UK	#####
Cheltenham	England	GL50 4PS	UK	#####
Gloucester		GL4	UK	#####
Bath	England	BA1 3RR	UK	#####
Cheltenham	England	GL50	UK	#####
Gloucester		GL4	UK	#####
Gloucester		GL1	UK	#####
Cheltenham	England	GL53	UK	#####
Gloucester		GL4	UK	#####
London		E1	UK	#####
Gloucester		GL4	UK	#####
Toronto		2283	Australia	#####
Ross		HR9	UK	#####
Swindon	England	SN25	UK	#####
Stroud		GL5	UK	#####
London			UK	#####
Cheltenham	England	GL53	UK	#####
Gloucester		GL3	UK	#####
Castle Cary		BA7	UK	#####
Stroud		GL5	UK	#####
Catanzaro		88100	Italy	#####
High Wycom	England	Hp157he	UK	#####
Forfar		DD8	UK	#####
Edinburgh	Scotland	EH166eg	UK	#####
Aberdeen		AB22	UK	#####
Rugby		CV23 8DX	UK	#####

Gloucester	England	GL3 1AD	UK	#####
Wisbech		PE13	UK	#####
s Newport		NP19	UK	#####
Gloucester	England	GL2 4UD	UK	#####
Gloucester	England	WF12	UK	#####
r Gloucester	England	GL54 5NQ	UK	#####
Ramsgate	England	ct11 8dd	UK	#####
			UK	#####
Cheltenham	England	GL51 9LF	UK	#####
Gloucester	England	GI50	UK	#####
Milton Keynes	England	MK10	UK	#####
Nailsworth		GL6	UK	#####
Lydney	England	GL15 5GB	UK	#####
Cheltenham	England	GL51 7TB	UK	#####
r Barnsley		S70	UK	#####
Gloucester		GL4	UK	#####
Cheltenham	England	GL52	UK	#####
Gloucester	England	GL1 3HZ	UK	#####
Coventry		CV1	UK	#####
Cheltenham	England	GL52	UK	#####
la Wallingford	England	OX10 9EY	UK	#####
Cheltenham	England	GL52 5GD	UK	#####
Torquay		TQ2	UK	#####
Bethnal Green		E2	UK	#####
nt London		SW16	UK	#####
Cheltenham	England	GL52	UK	#####
Newbridge		NP11	UK	#####
Rotherham	England	S63	UK	#####
Caerphilly	Wales; Cym	CF83	UK	#####
Bangor		BT20	UK	#####
Swindon		SN1	UK	#####
Birmingham	England	B34	UK	#####
Abergavenny		NP7	Sri Lanka	#####
Bishops Clee	England	GL52 8XS	UK	#####
s Gloucester		GL2	UK	#####
Cheltenham	England	GL52	UK	#####
Cheltenham	England	GL52	UK	#####
lla Milton Keynes		MK2	UK	#####
Cheltenham	England	GL51	UK	#####
n Bristol		BS9	UK	#####
-N Stroud		GL5	UK	#####
l Cheltenham	England	GL50 4JP	UK	#####
ll- Bath		BA2	UK	#####
Cheltenham	England	GL526XY	UK	#####
Wembley		HA9	UK	#####
London		EC4N	UK	#####
so East Kilbride		G74 2AZ	UK	#####
London		Se5 9dj	UK	#####
London		HA0	UK	#####
Gloucester		GL3	UK	#####



Cheltenham England	GL52	UK	#####
Norwich England	NR95RT	UK	#####
Cheltenham England	GL51	UK	#####
Cheltenham England	GL51	UK	#####

APPLICATION NO: 23/00728/FUL	OFFICER: Mrs Lucy White
DATE REGISTERED: 29th April 2023	DATE OF EXPIRY: 24th June 2023/Agreed Ext of Time 20 th November 2023
DATE VALIDATED: 29th April 2023	DATE OF SITE VISIT:
WARD: St Marks	PARISH:
APPLICANT:	Cheshire West And Chester Council
AGENT:	SF Planning Limited
LOCATION:	Lansdown Industrial Estate Gloucester Road Cheltenham
PROPOSAL:	Erection of single storey building to accommodate artists' studios (replacement of the existing artists' studios at Lansdown Industrial Estate).

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site is located within the far north-west corner of the Lansdown Industrial Estate (LIE) and forms part of a private car parking area that serves nearby industrial units. The site is therefore hard surfaced and marked out with parking spaces. The rear gardens of properties in Rowanfield Road and Roman Road form the north and west site boundaries with Unit 41a (Cleevley Motors) to the east and Sunningend Business Centre/Maxet House located further south. Access to the site is via Gloucester Road and the internal, main estate road running through LIE.
- 1.2 The application proposes the erection of a single storey, pitched roof building with associated parking and landscaping. The building is intended to accommodate artists' studios and has been submitted concurrently with an application that relates to the northern half of LIE.
- 1.3 The Cheltenham Artists' Studios currently occupy Unit 1A of LIE. This building and others is proposed to be demolished to facilitate the redevelopment of the northern half of the estate for residential purposes. An application seeking outline planning permission for the erection of up to 215 dwellings following the demolition of all existing buildings is, at the time of writing, also being considered by the Council (ref 21/002832/OUT). The proposed artists' studios building would offer suitable replacement accommodation upon their displacement following the implementation of the aforementioned proposed residential scheme, should it receive planning permission.
- 1.4 The applicant for 21/02832/OUT has confirmed that it would facilitate the construction of the new building as proposed, but the Lansdown Art Studios would need to fund their occupation of the building.
- 1.5 This report should therefore be read alongside the officer report for 21/02832/OUT which also discusses the public realm enhancements that the proposed artists' studios building could bring to the wider estate and the s106 obligations required to ensure the delivery of the artists' studios alongside the implementation and construction of the above proposed residential scheme for the northern half of the estate.
- 1.6 This application is before the Planning Committee because of its direct link to the above planning application (21/02832/OUT) for the northern part of Lansdown Industrial Estate. As such, both applications are being considered concurrently. Regardless, this application must be determined separately and on its individual merits. Any decision made on the larger residential application (21/02832/OUT) is not a determining factor when considering the artists studios application.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Land Allocated for Mixed Use
Airport safeguarding over 15m
Principal Urban Area

Relevant Planning History:

21/02828/OUT PCO

Outline application for mixed use redevelopment at Units 22 and 23 Lansdown Industrial Estate (residential and commercial) with all matters reserved apart from access, following demolition of existing buildings

21/02832/OUT PDE

Outline application for the redevelopment of the northern part of Lansdown industrial estate for up to 215 dwellings with associated access roads, parking and public open space following the demolition of the existing buildings. All matters reserved except for access.

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development
 Section 4 Decision-making
 Section 8 Promoting healthy and safe communities
 Section 9 Promoting sustainable transport
 Section 12 Achieving well-designed places
 Section 14 Meeting the challenge of climate change, flooding and coastal change

Adopted Cheltenham Plan Policies

EM1 Employment Land and Buildings
 EM2 Safeguarding Non-Designated Existing Employment Land and Buildings
 D1 Design
 SL1 Safe and Sustainable Living
 GI2 Protection and replacement of trees
 GI3 Trees and Development
 CI1 Securing community infrastructure benefits

Adopted Joint Core Strategy Policies

SD1 Employment - Except Retail Development
 SD3 Sustainable Design and Construction
 SD4 Design Requirements
 SD9 Biodiversity and Geodiversity
 SD14 Health and Environmental Quality
 INF1 Transport Network
 INF2 Flood Risk Management
 INF4 Social and Community Infrastructure
 INF5 Renewable Energy/Low Carbon Energy Development

Supplementary Planning Guidance/Documents

Cheltenham Climate Change (2022)

4. CONSULTATIONS

See appendix at end of report

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	71
Total comments received	8
Number of objections	1
Number of supporting	6
General comment	1

5.1 The application was advertised by way of 71 letters sent to neighbouring properties and businesses and site notices displayed at accessible locations within and adjacent to the site. A total of 8 third party representations were received, the majority in support of the proposed development. The comments/concerns raised, in summary, are as follows:

- Proposals will provide much needed affordable studio space for the local artists, securing their future within Cheltenham and enhancing cultural art within the Borough and the Council's Public Arts Strategy

- Proposed artists' studios would be a good neighbour to adjacent residential properties, with minimal noise and non-toxic waste generation.
- What screening will be provided to hide the ground floor level from houses in Rowanfield Road. The pitched roof would be visible and existing boundary trees were removed by the owners of the industrial estate.
- Odour from proposed refuse store

6. OFFICER COMMENTS

6.1 Determining Issues

6.2 The key issues for consideration are the design, scale and layout of the proposed development and their impacts on the character and function of the industrial estate and the amenities of neighbouring land users. Highway safety and the potential impacts arising from displacement parking within the industrial estate will also need to be considered.

6.3 As discussed in the introduction, this application has been submitted concurrently with a proposed scheme to redevelop the northern half of the estate for residential purposes. As such, the implementation and delivery of the artists' studios building alongside the construction of the proposed residential scheme will also need to be considered very carefully and by way of a s106 obligation.

6.4 Design and layout

6.5 Section 12 of the NPPF sets out that good design is a key aspect to achieving sustainable development and creating better places to in which to live. Similarly, Policy SD4 of the JCS require development to respond positively to and respect the character of the site and its surroundings. These objectives are reiterated in Policy D1 of the Cheltenham Plan which requires development to achieve a high standard of architectural design that complements neighbouring development.

6.6 The proposed new building would be single storey, rectangular in form and with a pitched roof. The materials palette consists of external red brick facing walls incorporating architectural feature blockwork and areas to apply art murals. The proposed roof covering is light grey metal cladding. A series of roof lights has been oriented to meet the (optimum light) requirements of the end user. Other ground floor fenestration consists of dark grey PVC or aluminium framed windows within each elevation. An array of photovoltaic (PV) panels is shown on the south facing roof slope and 3no. air source heat pumps (ASHPs) would be provided to the rear (west) side of the building.

6.7 Refuse and cycle storage facilities and dedicated parking for 3no. vehicles to the front of the building are also provided. The applicant has indicated that the adjacent remaining parking area (48 spaces) would also be made available to the artists' studios.

6.8 The proposed refuse store is separated from the main entrance by a screen/feature wall and would be further obscured by a timber fence surround. The feature screen wall and the front elevation have been designed to allow space for the artists to apply art work, murals and signage. The applicant has provided additional information on how this art work would be applied to the face of the building. If required, advertisement consent would be sought at later date. A soft landscaping scheme consisting of low maintenance shrubs and grass/wildflowers along the north west side of the building is also proposed.

- 6.9** The design approach is fairly simple but has a contemporary feel. The architectural features of the building clearly correspond with the intended use of the building as artists' studios, which internally would be sub-divided into studio spaces to suit the needs of the occupier.
- 6.10** The design, scale and layout aspects of the proposals are considered acceptable. As such, the proposals adhere to the objectives of Policy D1 of the Cheltenham Plan, SD4 of the JCS and section 12 of the NPPF (2023).
- 6.11** Employment Use
- 6.12** Lansdown Industrial Estate is not identified as a key employment site within the Borough, therefore Policy EM1 of the Cheltenham Plan (CP) is not relevant.
- 6.13** Policy H2 of the CP allocates a number of sites for mixed-use development, including LIE. Each allocation is supported by a site-specific policy which provides further guidance and in this case Policy MD1 of the CP is relevant.
- 6.14** Policy MD1 relates specifically to LIE. The site specific requirements of the policy are an employment led regeneration of LIE which may include an element of residential development, provided that existing provision is offset by a net gain in the quality and/or number of jobs provided on the site. It also states that *'The site is capable of redevelopment for mixed-uses, including a continued element of employment in better-quality units with some new residential development. There would be a net loss of employment land but this should be offset by an upgrade in the quality and density of premises'*.
- 6.15** In addition to MD1, CP Policy EM2 could also be considered relevant to the proposals in that it seeks to safeguard non-designated existing employment land and buildings within the Borough. It states that development proposals for a change of use of land and buildings currently or last in employment use will only be permitted where certain criteria are met.
- 6.16** Although there may some conflict with this policy in that the proposals are not employment generating in the traditional sense, there are no industrial buildings on the application site, which is currently used as a car park serving the wider estate. As such, the proposals would not result in the loss or displacement of employment.
- 6.17** An artist's studio falls within Use Class E (commercial, business and services) and there is currently a range of uses across LIE which includes those falling within Class E. The proposals also seek to secure the long term future of the Lansdown Art Studios who have been present at LIE for some 25 years and provide valuable and much sought after studio space for local artists, which contributes significantly to Cheltenham's arts culture and emerging Culture Strategy. This, and the enhancements the proposed development would bring generally to the southern half of the estate, are material considerations in the determination of this application and are considered to weigh heavily in the balance.
- 6.18** With the above in mind, Paragraph 97 of the NPPF, in supporting the provision of social, recreational and cultural facilities and services to meet community needs, states that planning policies and decisions should *'plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places for worship) and other local services to enhance the sustainability of communities and residential environments.'*
- 6.19** In light of the above considerations, the proposed development adheres broadly to the objectives of Policies MD1, EM2, H2 and D1 of the Cheltenham Plan, Policies SD3, SD4 and INF4 of the JCS.

6.20 Impact on neighbouring property

- 6.21** Section 12 of the NPPF requires development to create places with a high standard of amenity for existing and future users. Policy SL1 of the Cheltenham Plan advises that development will only be permitted where it will not cause unacceptable harm to the amenity of adjoining land users or the locality. In assessing impact on amenity, the Council will take account of matters including, but not limited to, loss of privacy, light and outlook. The policy is consistent with adopted JCS policy SD14.
- 6.22** The nearest residential properties are located to the north east of the site in Rowanfield Road. All other surrounding development is in commercial use. All the concerns raised by local residents are duly noted. These concerns relate primarily to the location of the proposed refuse store and the height of the roof.
- 6.23** The proposed refuse store would be screened by timber fencing and located some 12.8 metres from the rear elevation of No 84 Rowanfield Road. Although located adjacent to the boundary with No 84, the intended user of the building is unlikely to generate waste (odour/pollutants) that would cause significant harm to the occupiers of neighbouring properties.
- 6.24** The nearest affected dwelling is 3 Emanuel Cottages. The ridge height of the proposed building is approximately 4.4 metres, the side elevation of which would be located approximately 2.5 metres from the shared boundary with this neighbouring property. The eaves height of the new building is 3 metres and the shallow pitched roof would slope away from the north site boundary. The side elevation of 3 Emanuel Cottages faces the shared, timber fenced boundary and there is one small ground floor window in this side elevation. Therefore, despite the proximity of the new building, the potential impact on the amenities of the occupiers of 3 Emanuel Cottages and those of the closest Rowanfield Road properties, would not be significantly harmed. Officers are also mindful of the scale of building that could be erected adjacent to a property boundary within the curtilage of a dwelling house under permitted development.
- 6.25** The Council's Environmental Health team (EHO) has reviewed the scheme and has no overriding concerns subject to approval of the details of the proposed ASHPs, given their number and proximity to neighbouring property boundaries. A condition has been added accordingly.
- 6.26** There are no other concerns arising from the proposals in respect of loss of light, privacy/overlooking, outlook, overbearing appearance or noise and disturbance.
- 6.27** For the above reasons, the proposals are considered to be in accordance with the objectives and policy guidance of section 8 of the NPPF (2023), Policy SL1 of the Cheltenham plan and Policy SD14 of the JCS.

6.28 Access and highway issues

- 6.29** Paragraph 11 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Policy INF1 of the JCS reiterates the stance of the NPPF and states that proposals should ensure that safe and efficient access to the highway network is provided for all transport modes.
- 6.30** The proposed development would be accessed via Gloucester Road and the internal estate road and would provide 3no. dedicated spaces (including 1no. disabled space) for the artists' studios; which in their current location have no formal allocated parking.

- 6.31** However, it is acknowledged that the proposals would result in the loss of existing parking provision for the wider industrial estate (20 spaces), which has the potential to displace car parking onto the local road network (as well as into other areas of LIE). The Highway Authority (HA) therefore requested that a parking survey be undertaken to assess existing parking demand for this part of LIE in addition to an assessment of the likely number of vehicular trips resulting from the proposals and an accumulation assessment to determine the likely resulting parking demand.
- 6.32** The applicant's subsequent Technical Note and parking survey conclude that there would be no adverse parking impact as a result of the development. The remaining parking spaces would be able to accommodate the demand within LIE without displacement onto the local road network. The applicant also points out the introduction in June 2023 of number plate recognition cameras and signage; sought to address previous fly-parking by non-estate users. In addition to the existing 68 spaces on the application site, the majority of the units across the estate have allocated parking within front forecourt areas. Thereby, a total of 212 formal car spaces are currently available within the southern part of the estate. The proposals would therefore result in a 10% loss of overall parking spaces. The parking accumulation assessment found that on average there would be 57 available parking spaces at any one time within the southern half.
- 6.33** The HA has reviewed the above documents and concludes that the proposal should not result in an adverse impact on highway safety or congestion. However, a condition requiring the subsequent approval of a construction management plan is recommended. This would ensure pedestrian and motorist safety and that the highway network is not adversely impacted during the construction phase. This condition has been added accordingly.
- 6.34 Sustainability**
- 6.35** Policy SD3 of the JCS requires all new development to be designed to contribute to the aims of sustainability by increasing energy efficiency and minimising waste and air pollution. Development proposals are also required to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings. Similarly, Policy INF5 of the JCS sets out that proposals for the generation of energy from renewable resources or low carbon energy development will be supported.
- 6.36** The Cheltenham Climate Change SPD (adopted June 2022), sets out a strategy for decarbonising buildings over the next decade. For all new development there is an opportunity to improve the environmental performance of buildings through the inclusion of technologies and features such as photovoltaics, heat recovery, permeable (or minimal) hard surfaces, fabric first design approach, insulation renewable and appropriately sourced materials and alternative heating systems.
- 6.37** The application is not accompanied by a Sustainability Statement. However, the applicant's covering letter sets out the proposed sustainability features of the development which include high performance insulation, solar panels, air source heat pumps, efficient heat and light systems and the use of fabric first construction methods.
- 6.38** The above measures are considered acceptable and proportionate to the nature and scale of the development proposed.
- 6.39** Conditions are suggested to secure the implementation of the ASHPs and solar panels.

6.40 Other considerations

- 6.41** S106 Obligation/Planning Application 21/02832/OUT

- 6.42** As discussed in the report introduction, the s106 in respect of application 21/02832/OUT (should planning permission be granted), would need to include an obligation requiring the implementation/construction of the new artists' studios building alongside the delivery of the residential scheme. The drafting of the s106 obligations is still in progress, but it is likely that various trigger points would be set for the commencement and completion of construction work on the artists' studios and associated completion/occupation of a certain number of new dwellings within the southern half of the estate. There is also likely to be a period of displacement for the artists following the demolition of their current building, the implications of which will form part of the s106 negotiations and drafting.
- 6.43** Planning permission is typically granted subject to a condition requiring its implementation within a three year period. Should outline planning permission be granted for application 21/02832/OUT, the implementation/commencement of this planning permission and approval of subsequent reserved matters applications are likely to occur beyond the three year time period that would normally be imposed by condition on the artists' studios planning permission. Given the very special circumstances of this case, officers are suggesting therefore, that the time period for implementation of the artists' studios planning permission be extended to 5 years.
- 6.44** Public Sector Equalities Duty (PSED)
- 6.45** As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are three main aims:
- Removing or minimising disadvantages suffered by people due to their protected characteristics
 - Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
 - Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.
- 6.46** Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have "regard to" and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.
- 6.47** In the context of the above PSED duties, this proposal is considered to be acceptable.

7. CONCLUSION AND RECOMMENDATION

- 7.1** For the reasons set out above, the recommendation is therefore the grant planning permission subject to the following conditions. The applicant has agreed to the pre-commencement conditions.

8. CONDITIONS / INFORMATIVES

- 1 The planning permission hereby granted shall be begun not later than the expiration of five years from the date of this decision.

Reason: To accord with the provisions of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 Prior to first occupation of the building hereby approved, the proposed solar PV panels shall be installed in accordance with the approved drawings and details (to include their operation, design, appearance and positioning on the roof) which shall have been submitted to and approved in writing by the local planning authority.

Reason: In the interests of the character, appearance and amenities of the area and reducing carbon emissions, having regard to adopted policies D1 and SL1 of the Cheltenham Plan (2020), adopted policies SD3, SD4 and SD14 of the Joint Core Strategy (2017) and guidance set out in Cheltenham Climate Change SPD (2022).

- 4 Prior to first occupation of the development, refuse and recycling storage facilities shall be provided in accordance with the approved plans and shall be retained as such thereafter.

Reason: In the interests of sustainable waste management and recycling, having regard to Policy W36 of the Gloucestershire Waste Local Plan.

- 5 Prior to first occupation of the development, parking and turning facilities shall be provided in accordance with the approved plans. Such areas shall not be used for any purpose other than the parking and turning of vehicles and shall remain free of obstruction for such use at all times.

Reason: To ensure the adequate provision of car parking within the site in the interests of highway safety, having regard to adopted policy INF1 of the Joint Core Strategy (2017).

- 6 Prior to first occupation of the development, secure covered cycle storage shall be provided in accordance with the approved plans. The cycle storage shall thereafter be retained available for such use in accordance with the approved plans at all times.

Reason: To ensure the adequate provision and availability of cycle parking, so as to ensure that opportunities for sustainable transport modes have been taken up, having regard adopted policy INF1 of the Joint Core Strategy (2017).

- 7 Prior to the commencement of development, including any works of demolition or site clearance, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

The approved method statement shall be adhered to throughout the development process and shall, where necessary:

- i) specify the type and number of vehicles expected during the construction of the development;
- ii) allocate space for the parking of vehicles for site operatives and visitors;
- iii) allocate space for the loading and unloading of plant and materials;
- iv) allocate space for the storage of plant and materials used in constructing the development;
- v) specify the intended hours of construction;
- vi) specify measures to control the emission of noise, dust and dirt during construction;
- vii) provide for wheel washing facilities; and
- viii) specify the access points to be used and maintained during the construction phase.

Reason: To minimise disruption on the public highway and to adjacent land users, and accommodate the efficient delivery of goods and supplies during the course of the construction works, having regard to adopted policy INF1 of the Joint Core Strategy (2017). Approval is required upfront because without proper mitigation the works could have an unacceptable highway impact during construction.

- 8 Details of the type/model, operation and predicted noise levels of the proposed air source heat pumps (ASHPs) shall be submitted to and approved in writing by the local Planning authority. The ASHPs shall be installed prior to first occupation of the building hereby approved and in accordance with the details approved. The ASHPs shall be retained as such thereafter unless otherwise first agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of future occupiers and neighbouring properties and to reduce carbon emissions, having regard to adopted policies D1 and SL1 of the Cheltenham Plan (2020), adopted policies SD3, SD4 and SD14 of the Joint Core Strategy (2017) and guidance set out in Cheltenham Climate Change SPD.

- 9 Prior to the commencement of development, a surface water drainage scheme, which shall incorporate Sustainable Urban Drainage System (SUDS) principles, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include a programme for implementation of the works; and proposals for maintenance and management. The development shall not be carried out unless in accordance with the approved surface water drainage scheme.

Reason: To ensure sustainable drainage of the development, having regard to adopted policy INF2 of the Joint Core Strategy (2017). Approval is required upfront because the design of the drainage is an integral part of the development and its acceptability.

- 10 Prior to the commencement of development, a site investigation and risk assessment shall be carried out to assess the potential nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11 and shall include:

- a) a survey of the extent, scale and nature of contamination
- b) an assessment of the potential risks to:
 - human health
 - property (including buildings, crops, livestock, pets, woodland and service lines and pipes)
 - adjoining land
 - ecological systems
 - groundwaters and surface water
 - archaeological sites and ancient monuments
- c) an appraisal of remedial options to mitigate against any potentially significant risks identified from the risk assessment.

Where remediation is required, a detailed remediation scheme to bring the site to a condition suitable for the intended use shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme shall ensure that the site will not qualify as contaminated land under Part 2a of the Environmental Protection Act (1990) in relation to the intended use of the land after remediation.

The site investigation, risk assessment report, and proposed remediation scheme shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with adopted policy SD14 of the Joint Core Strategy (2017).

- 11 In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority and development shall be halted on that part of the site affected by the unexpected contamination. An investigation and risk assessment must then be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11 and a remediation scheme, where necessary, also submitted. Following completion of measures identified in the approved remediation scheme, a verification report shall be submitted to and approved in writing by the Local Planning Authority before development can recommence on the part of the site identified as having unexpected contamination.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with adopted policy SD14 of the Joint Core Strategy (2017).

- 12 No external facing or roofing materials shall be applied unless in accordance with:
a) a written specification of the materials; and/or
b) physical sample(s) of the materials.
The details of which shall have first been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the area, having regard to adopted policy D1 of the Cheltenham Plan (2020) and adopted policy SD4 of the Joint Core Strategy (2017).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, the authority sought minor revisions to the design and layout of the proposals in the interests of the amenities of the locality.

Following these negotiations, the application now constitutes sustainable development and has therefore been approved in a timely manner.

Consultations Appendix

Building Control

12th May 2023 - This application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

Publica Drainage And Flooding

15th May 2023 - There are no objections on flood risk and drainage matters provided that a sustainable surface water drainage plan is submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. The finished floor levels of the proposed building should be set appropriately based on surface water flood risk to reduce the risk of damages within the building.

The drainage plan should detail how surface water on the site will be disposed with flood risk mitigated to both the proposed site and any neighbouring/downstream properties. Rainwater collection/re-use and the use of permeable surfaces are recommended, as per the Cheltenham Climate Change SPD. As per the Sustainable Drainage System (SUDS) hierarchy, infiltration should be initially considered and BRE 365 infiltration testing should be undertaken to test for feasibility and to establish a site specific infiltration rate for drainage system design. If infiltration is proven not to be viable due to poor infiltration rates, onsite attenuation (flood storage) will be required prior to controlled discharge off the site. The maximum allowable discharge rate needs to be controlled as per the Lead Local Flood Authority (LLFA) requirements for a brownfield development. These requirements state that the peak discharge in the 1 in 100 year rainfall event (plus 40% allowance for climate change) should be as close as is reasonably practicable to the greenfield runoff rate for the same event. If this is proven to not be feasible then a 40% reduction over the pre development discharge rate is acceptable. An exceedance surface water route plan for flows greater than the 1 in 100 year rainfall event should also be submitted, identifying the surface water flow routes through the site should the capacity of the drainage system be exceeded.

GCC Highways Planning Liaison Officer 1

16th June 2023 –

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be deferred.

The justification for this decision is provided below.

The proposal intends to remove some 20no. parking spaces which currently appear to serve the entire estate, and it is not clear from the information submitted, whether the removal of these many spaces is likely to result in displacement of vehicles onto the adjacent local road network. As such, the applicant is requested to carry out parking surveys to ascertain the existing demands of the car park, as well as an assessment to determine the likely number of vehicle trips resulting from the development proposal with an accumulation assessment to determine the likely resulting parking demands.

The Highway Authority therefore submits a response of deferral until the required information has been provided and considered.

GCC Highways Planning Liaison Officer 2

12th October 2023 –

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection subject to conditions.

The justification for this decision is provided below.

The application site is located within the Lansdown Industrial Estate, Cheltenham, approximately 2km west of Cheltenham town centre. The application seeks permission for the erection of a single storey building to accommodate artists studios (replacement of the existing artist studios at Lansdown Industrial Estate) at Lansdown Industrial Estate.

The site is accessed via B4633 Gloucester Road, a two-way single carriageway road subject to a posted speed limit of 30mph. The site is a typical industrial estate complex, where the carriageway is bordered by paved areas, a cycle lane and typical street furniture including bollards and street trees. Regarding highway safety, there are no recorded instances of a personal injury collisions within 50m of the application site within the most recent 5-years.

Following receipt of the Car Parking Assessment (05400-T-01-B), the Highway Authority can conclude that the proposal is not perceived to result in an adverse impact of highway safety or congestion. The report demonstrates that the loss of 20 car parking spaces will not result in an adverse impact on the local highway network, as of the approx. 212 formal car parking spaces on the southern side of the industrial estate will be reduced to 192. Where a parking accumulation assessment using ATC data from September/October 2021 demonstrates that the average maximum weekday parking accumulation is 135 cars parked, and therefore there would be an average of 57 car parking spaces available within the development in place.

However, the application site is anticipated to receive a high number of vehicle movements, it is therefore necessary to condition for a construction management plan to ensure pedestrian and motorist safety and that the highway network is not adversely impacted during the construction phase.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. There are no justifiable grounds on which an objection could be maintained.

Conditions

Construction Management Plan

Prior to commencement of the development hereby permitted details of a construction management plan shall be submitted to and approved in writing by the Local Planning

Authority. The approved plan shall be adhered to throughout the demolition/construction period. The plan/statement shall include but not be restricted to:

Parking of vehicle of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);

Advisory routes for construction traffic;

Any temporary access to the site;

Locations for loading/unloading and storage of plant, waste and construction materials;

Method of preventing mud and dust being carried onto the highway;

Arrangements for turning vehicles;

Arrangements to receive abnormal loads or unusually large vehicles;

Highway Condition survey;

Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.

Environmental Health

3rd August 2023 -

We will need to see a noise assessment for the impact of these on nearby residential properties. As there are more than one external unit, this will need to be the standard of BS4142:2014 A1 2019. I am happy for this to be required by condition for approval before first use.

Cheltenham Civic Society

24th May 2023 - OBJECT

We strongly support the proposed use, but this is an uninspired design. There is no information about how this will fit into the masterplan/ wider context of the site.

APPLICATION NO: 23/00728/FUL	OFFICER: Mrs Lucy White
DATE REGISTERED: 29th April 2023	DATE OF EXPIRY : 24th June 2023
WARD: St Marks	PARISH:
APPLICANT:	Cheshire West And Chester Council
LOCATION:	Lansdown Industrial Estate Gloucester Road Cheltenham
PROPOSAL:	Erection of single storey building to accommodate artists studios (replacement of the existing artist studios at Lansdown Industrial Estate).

REPRESENTATIONS

Number of contributors	8
Number of objections	1
Number of representations	1
Number of supporting	6

14 Great Western Road
Cheltenham
Gloucestershire
GL50 3QN

Comments: 17th May 2023

The new art studios will provide much needed affordable studio space for local artists to work, replacing the existing building which has housed a growing community of artists for over 20 years.

The Lansdown Art Studios supports local businesses and encourages positive well-being for the community and the artists. The new art studios will secure their future and continued contribution to the culture of Cheltenham.

84 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 8th May 2023

We have 3 comments:

1) What screening will be installed to hide the building from ground level view from houses along Rowanfield Road? Even though the proposed new building is single storey with pitched roof it will still be visible - this is especially so since the landlords of the LIE removed existing trees/greenery a few years ago which provided screening and replaced with only a 6-7 ft fence. The new build will present an opportunity to re-install appropriate screening.

2) The proposal includes a bin store at the rear of the building adjoining houses 84-86 Rowanfield Road. Depending on waste to be disposed of this could cause smell

emanating into gardens immediately adjoining the building. Reassurance of the type of waste to be disposed of is required. Re-locating the bins on the other side of the property next to parking might be more suitable?

3) The proposal includes bio-diverse planting to the rear of the building but this is not specified. What is proposed?

Zed House
Malvern Road
Cheltenham
Gloucestershire
GL50 2JH

Comments: 22nd May 2023

As Chair of the Lansdown Art Studios Association, on behalf of all our current artist members, previous members and artist colleagues, I confirm our wholehearted support for this application to build new, sustainable art studios that will benefit the arts culture of Cheltenham and provide a long-term home for a large group of artists.

In its new location, the studios will be good neighbours to adjacent residents. In a new, low height single storey building, making art will be a quiet, low-key activity that generates no noise and minimal non-toxic waste.

If this application is approved, then our objections to application no. 21/02832/OUT are withdrawn.

Units 41B And 42
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

Comments: 18th May 2023

Letter attached.

42 King Arthur Close
Cheltenham
Gloucestershire
GL53 7EX

Comments: 12th May 2023

This will be a wonderful contribution to Cheltenham's cultural art scene. Local artists will be given the opportunity to work in designated studio spaces and secure the future of the Arts for future generations in the town. The single storey design will mean better access for artists and visitors with disabilities.

1 Southfield Approach
Cheltenham
Gloucestershire
GL53 9LN

Comments: 6th June 2023

I strongly support this application. Cheltenham has many artists but there is a lack of affordable studio space and many people do not have the space to paint at home. The Lansdown Studios regularly invite members of the public to visit their studios and these events and their exhibitions in the town's art galleries are always well attended, so they are making a positive contribution to the community.

The Dairy
The Leigh
Gloucester
GL19 4AG

Comments: 16th May 2023

I support the relocation of the Art Studios. There is a shortage of Art and Craft studios in Cheltenham. Lansdown Art Studios have provided an important space that is supportive for the artists enabling them to pursue their work and contribute to the Cheltenham Art Scene.

30 Willowherb Close
Cheltenham
Gloucestershire
GL52 5LP

Comments: 15th May 2023

I am strongly supportive of the relocation of the art studios as they are Cheltenham's largest artistic non-profit making community and offer rare studio space to creative people. A purpose-built single storey art studio complex will be an asset to Cheltenham's wider art community and will also provide both visitors and artists easy access for all mobility levels. This new complex will be a major improvement on the present facilities on the site, to the town as a whole, and its public arts' strategy.



17th May 2023

For the attention of Ms Lucy White

Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucester
GL50 1PP

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720
enquiries@v3manufacturing.com

Dear Sirs

Reference: 23/00728/FUL - Erection of Single Storey Building to Accommodate Artists Studio

I write in connection with the above as set out in your letter of 4th May 2023.

Although we are very supportive of the artist's studio and the important cultural role they play in our community, we do have major concerns that the solution that is being proposed, whereby a purpose built facility will be erected on what is currently parking on the Lansdown Industrial Estate, will only exacerbate some of the main issues of concern that we previously raised in relation to Outline Application **21/02832/OUT** .

Our principal concerns with the latest Application are:

- parking is already at a premium on the site for the employees of the businesses operating from there;
- the Travel Plan for the previous Outline Application for 215 dwellings included a proposal to reduce from the standard CBC recommendations, the ratio of parking for each size of dwelling, which we believe will already lead to residents overspilling onto the remaining industrial area;
- losing a further area of parking in order to erect the artist's studio will only serve to exacerbate the already challenging parking, access, safety and security issues that were previously highlighted and which we do not believe have been adequately addressed or resolved to date.

I would refer you to our letter of 7th February 2022, where we listed the full list of concerns that we had relating to the Outline Planning Application **21/02832/OUT** (Appendix 1 attached and which we do not believe have been adequately addressed or resolved.

If you would like to discuss or require further information on any of the points raised above, we are very much available to speak or to meet in person on site.

Yours faithfully



Susan Hutchings

Director

CC: ccl.sandra.holiday@cheltenham.gov.uk & cll.richard.pineger@cheltenham.gov.uk

Attachments:

- Schedule 1: Copy of Letter submitted to L/L Consultation Process
Schedule 2: Photographs Demonstrated Parking and HGV Congestion



7th February 2022

For the attention of Ms Lucy White

Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucester
GL50 1PP

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720

enquiries@v3manufacturing.com

Dear Sirs

Reference: 21/02832/OUT - Outline application for the redevelopment of the northern part of Lansdown Industrial Estate

I write in connection with the above as set out in your letter of 19th January 2022.

Firstly, I would like to reiterate the general disappointment that we expressed as part of the consultation process with the Landlords representatives in August 2021 (copy attached), that the plans are under consideration for a scheme that will result in the reduction of industrial space in favour of residential on this site. Commercial space in Cheltenham is already at a premium with high demand, and this will be detrimental to the protection of employment in the local area.

Having now studied in detail the various documents submitted in relation to the application, please find set out below, a number of specific points of concern we would ask to be addressed as part of the planning process.

Access and Public Safety

Have the Public Protection Team been consulted on this scheme ?

Specifically has a health and safety assessment been undertaken of the risks presented by an increased volume in pedestrians and cyclists ? The proposed pedestrian and cyclist access route is through an area of high industrial traffic, including heavy goods vehicles and fork lift trucks as well as busses in the main entrance area from the Gloucester Road. This is particularly concerning bearing in mind a high number of these pedestrians and cyclists are likely to be children who will be tempted to use the area as an extended playground and bike park ? What improvements to the Gloucester Road access and additional provision for HGV turning points are being considered, if vehicular access to the remaining industrial units is reduced through the removal of access from Rowanfield Road ? We raise this particularly as it is our understanding that this entrance is owned by ABC Motors with a legal easement / automatic statutory declaration attached to it.

Please find attached a number of photographs demonstrating the already congested nature of heavy goods vehicles, fork lift trucks and general site traffic in this area. This will be further exacerbated if space is lost for vehicular access in the provision of additional pedestrian walkways and cycle paths.

Noise & Odors

Has a noise impact assessment been undertaken ?

The V3 unit has a compressor sited 1 metre from proposed garden boundaries. This compressor can operate 24/7 during peak production periods. Due to the intermittent nature of demand it will be also be more noticeable than something with a constant background noise.



- What provisions is it proposed will be put in place around screening and noise insulation to ensure that industrial tenants do not face a continual barrage of residents' complaints on noise, odours and impact on their outlook that there will practically be very little they can do to improve, and actually shouldn't have to do, when occupying an industrial unit that permits B1, B2 and B8 use ?
- We have created more than 25 new jobs on our site over the last year, and demand for our products from this site is high. We need to be able to continue for the purpose we entered into a lease on, and without risk of restrictions on our operating hours and processes being imposed in the future.

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720
enquiries@v3manufacturing.com

Parking

- Have the Council Highways Team been consulted on the proposals ?
- The Travel Plan included in the application documents implies that there is a proposal to reduce from the standard CBC recommendations, the ratio of parking for each size of dwelling. If this is accepted, how is it proposed to manage and police the excess cars in the vicinity and ensure that they do not overspill onto the remaining industrial area of the estate further exacerbating the already challenging parking, access, safety and security issues referenced above ?

Site Security

- How is it proposed that security will be maintained in the remaining industrial area which is currently managed through gates at the main access points that are locked to the general public between 21/2200 hrs and 0600 hrs daily ?

Flood Risk

- The planning documents include a report on the flood risks for the new development area that has identified a risk of ground and surface water flooding for which there appear to be plans to mitigate and manage. Please advise what mitigation measures will be undertaken to manage ground and surface water in the remaining industrial units area due to the reduction of impermeable surfaces from the new development, and the risk of excess water seeping into the neighbouring area ?

If you would like to discuss or require further information on any of the points raised above, we are very much available to speak or to meet in person on site.

Yours faithfully



Susan Hutchings

Director

CC: ccl.sandra.holiday@cheltenham.gov.uk & cll.richard.pineger@cheltenham.gov.uk

Attachments:

Schedule 1: Copy of Letter submitted to L/L Consultation Process

Schedule 2: Photographs Demonstrated Parking and HGV Congestion



19/08/2021

Lansdown North Consultation Team
Camargue
Eagle Tower
Cheltenham
GL50 1TA

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720

enquiries@v3manufacturing.com

Dear Sirs

Ref : Lansdown Industrial Estate Northern Development Proposal

I write on behalf of a group of commercial and industrial tenants on the Lansdown Industrial Estate, who have recently been made aware of the proposals for the redevelopment to residential housing of the northern part of the estate.

Firstly, I would like to express our general disappointment that the plans are under consideration for a scheme that will result in the reduction of industrial space in favour of residential on this site, and how this may impact on the protection of employment in the local area.

Having now had an opportunity to study in detail the outline plans, I set out below a number of specific points and concerns that we would like be taken into account as part of the consultation process, which is due to conclude on 23rd August:

Access to and from the estate is already severely limited and the proposals to reduce further will have a severe impact on businesses operating, and access for emergency services

Parking on the estate is already at a premium with the cars of staff already employed by existing tenants having to park on areas outside of allocated and communal parking zones during the normal working week. With 218 new homes added to the site, even with resident parking bays included within the plans, this will almost certainly result in a significant increase in the number of additional cars in the area and will become untenable for industrial tenants.

Industrial units on the estate currently have permission for various uses, but are predominantly B1, B2 and B8 use which include light and general industrial and warehousing. Our understanding is that nothing in the outline plans can dilute the permissions that ourselves and neighbouring tenants have already been granted to continue to run our operations which may on occasions result in 24 hour and 7 day working.

Industrial and such close residential occupants are never going to make particularly harmonious neighbours due to noise, odours, less than aesthetically pleasing views and unsociable operating hours. In respect of V3's own leased area, the current plans show our compressor house and smoking area 1 metre from proposed garden boundaries. All of this can cause friction between individuals, and we do not want to be faced with the prospect of responding to a continual barrage of residents' complaints that there will practically be very little we can do to improve, and actually shouldn't have to do, having entered into a lease that permits us B1, B2 and B8 use.



- Increased pedestrian activity, much of which is likely to be children, will create major health and safety issues for traffic visiting the industrial units, much of which is heavy goods vehicles and who on occasions operate 24/7. There is no space available to increase pedestrian/cycling thoroughfares
- Increased on street parking and in unauthorised areas in the vicinity of the industrial units will present an additional access risk for emergency vehicles.
- A significant increase in pedestrian activity is also likely to result in increased crime levels and present a much higher security risk for individual industrial tenants.

Unit 42a
Lansdown Industrial Estate
Gloucester Road
Cheltenham
Gloucestershire
GL51 8PL

T: 01242 225720
enquiries@v3manufacturing.com

We are more than happy to meet to learn how these significant concerns will be addressed and look forward to hearing from you shortly.

Yours sincerely



Tim Cound
Director
V3 Manufacturing Limited

Cc Dan Maynard, Caisson















REPORT OF THE HEAD OF PLANNING ON PLANNING APPEALS

OVERVIEW

The purpose of this report is to provide Members of the Planning Committee with an overview of all planning appeals that have been received by the Council since the previous meeting of the Planning Committee. It further provides information on appeals that are being processed with the Planning Inspectorate and decisions that have been received.

RECOMMENDATION

To note the contents of the report.

Appeals Received

December 2023/January 2024

Address	Proposal	Delegated or Committee Decision	Appeal Type	Anticipated Appeal Determination Date	Reference
3 Rotunda Tavern Montpellier Street	Retention of temporary canopy structure for two years	Delegated Decision	Written representations	n/a	22/01681/FUL

Hilltop Stores Hilltop Road Cheltenham	Demolition of existing retail unit and erection of 2no. dwellings (revised scheme following withdrawal of application ref. 22/01728/FUL)	Delegated Decision	Written representations	n/a	23/01137/FUL
1 Coltham Fields Cheltenham Gloucestershire GL52 6SP	Erection of 1no. two storey dwelling on land adjacent 1 Coltham Fields	Delegated Decision	Written Representation	n/a	23/00596/FUL

Appeals being processed

Address	Proposal	Delegated/Committee Decision	Appeal Type	Outcome	Reference
Land at Shurdington Rd	Full planning application for residential development comprising 350 dwellings, open space, cycleways, footpaths, landscaping, access roads and other	Committee Decision	Written Representation (New procedure Change now a hearing date is 4th July 2023)	Not Decided (Decision issued on or before 10 th Jan 2024)	Planning ref: 20/01788/FUL Appeal ref: 23/00005/PP1
12 Pilford Road Cheltenham	Erection of a Garden Room	n/a	Written representation (Enforcement)	Not decided	Planning ref: 23/00001/DCUA Appeal ref: 23/00025/ENFAPP

1 Michaelmas Lodge Lypiatt Terrace Cheltenham	Use of area of land for vehicle parking	Delegated Decision	Written representation	Not decided	Planning ref: 23/00262/Cleud Appeal Ref: 23/00023/PP1
218 High Street	Change of use of the ground floor from a retail unit (Class E) to an Adult Gaming Centre (Sui Generis) and first floor to associated storage and staff area with external alterations and associated works.	Delegated Decision	Written Representations	Not decided	23/00452/COU Appeal Ref: 23/00028/PP1
Telecommunications Mast And Cabinet Prestbury Road Cheltenham Gloucestershire	Proposed 5G telecoms installation: H3G 15m street pole and additional equipment cabinets	Delegated Decision	Written representation	Not Decided	Planning Ref: 23/00431/PRIOR Appeal Ref: 23/00029/PP1
10 Selkirk Street	Erection of 1no. three storey self-build dwelling on land adjacent to 10 Selkirk Street	Committee Decision	Written Representation	Not Decided	Planning Ref 22/01441/FUL Appeal Ref: 23/00030/PP1

<p>Eagle Star Tower Montpellier Drive Cheltenham Gloucestershire</p>	<p>Application seeks confirmation that works undertaken in accordance with a previously approved change of use under Class J, Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 ref: 15/01237/P3JPA enables the rest of the conversion to lawfully continue at any stage</p>	<p>Delegated Decision</p>	<p>Written Representation</p>	<p>Not Decided</p>	<p>Planning ref: 23/01347CLPUD appeal ref: 23/00031/PP1</p>

The Forge, Branch Road, The Reddings	Use of land as a caravan site without restriction as to layout or numbers of caravans. (Revised application to 23/00936/CLEUD)	Delegated Decision	Written Representation	Not Decided	Planning ref: 23/01678/CLEUD Appeal ref: 24/00001/PP1

Appeals Decided

Address	Proposal	Delegated/Committee Decision	Appeal Type	Outcome	Reference
Adey Innovation Ltd Gloucester Road	Demolition of the existing office building and erection of a 66 bedroom care home for older people (Use Class C2) including associated access, parking and landscaping.	Delegated Decision	Appeal Hearing (25.01.23)	Appeal Allowed	Planning ref: 21/02700/FUL Appeal Ref: 22/00027/PP1
The Hayloft The Reddings	Conversion of the existing dwellinghouse into 9 self-contained apartments, and associated works	Committee Decision	Written Representation	Appeal Allowed	Planning ref: 22/00749/FUL Appeal Ref: 22/00028/PP1

159 High Street	Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital 75" LCD advert screens, plus the removal of associated BT kiosk(s) on Pavement Of Winchcombe Street Side Of Hays Travel 159 High Street	Delegated Decision	Written Representation	Appeal A and Appeal B Dismissed	Planning ref: 22/00322/ADV and FUL Appeal ref:22/00021/PP1 and 22/00022/ADV1
3 Apple Close, Prestbury	Replacement of existing conservatory with single storey rear extension. Increase in ridge height to facilitate loft conversion with rear dormer.	Delegated Decision	Written Representation	Appeal Allowed	Planning ref: 22/01145/FUL Appeal Ref: 23/00003/PP1

37 Market Street	Proposed side and rear extensions (revised scheme following refusal of application ref. 21/02361/FUL	Committee Decision	Written representations	Appeal Allowed Appeal Costs (Allowed)	Planning Ref: 22/00708/FUL Appeal Ref: 23/00004/PP1
Brecon House Charlton Hill Cheltenham Gloucestershire GL53 9NE	Construction of a paragraph 80 dwelling, estate management building, and associated landscaping, ecology enhancements,	Committee Decision	Appeal Hearing (date 22/03/23)	Appeal Hearing Dismissed	Planning ref: 21/02755/FUL Appeal ref: 23/00001/PP1
30 St Georges Place	Conversion to form 7no. dwellings, together with extensions and construction of new mansard roof	Delegated Decision	Written representations	Appeal Allowed	Planning ref: 22/00839/FUL appeal ref: 23/00002/PP1

10 Suffolk Road	First floor extension at rear of 10 Suffolk Road on top of existing kitchen roof, comprising of 1 new bedroom and ensuite bathroom (revised scheme 22/00966/FUL)	Delegated Decision	Written Representations Householder Appeal	Appeal Dismissed	Planning ref: 22/01340/FUL Appeal ref: 23/00011/PP1
101 Ryeworth Road	Erection of two storey and single storey rear extensions and single storey front extension.	Non-Determination	Written Representation	Appeal Dismissed	Planning ref: 22/01162/FUL Appeal Ref: 23/00006/PP2

o/s 195 High Street Cheltenham	Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital 75" LCD advert screens, plus the removal of associated BT kiosk(s)	Delegated Decision	Written Representation	Appeal A Dismissed Appeal B Dismissed	Planning Ref: 22/00328/ADV and FUL Appeal Ref: 23/00013/PP1 23/00014/ADV1
o/s 23 and 23 A Pittville Street	Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital 75" LCD advert screens,	Delegated Decision	Written representation	Appeal A Dismissed Appeal B Dismissed	Planning ref: 22/00326/ADV and FUL Appeal Ref: 23/00015/PP1 23/00016/ADV1
St Edmunds, Sandy Lane Road	Conversion and extension of an existing coach house/garage to a single dwelling with new access off Sandy	Delegated Decision	Written Representation	Appeal Decision Dismissed Cost Decision Dismissed	Planning ref: 22/02064/FUL Appeal Ref: 23/00008/PP1
Telecommunications Mast And Cabinet CLM26321 Glenfall Way	Proposed 5G telecoms installation: H3G 16m street pole and additional equipment cabinets	Delegated Decision	Written Representation	Appeal Dismissed	Planning ref: 22/02190/PRIOR Appeal Ref: 23/00018/PP1

4 Dymock Walk	Application for prior approval for the construction of one additional storey atop the existing dwelling (increase in height of 2.13 metres)	Delegated Decision	Written representation (Householder)	Appeal Dismissed	Planning ref: 22/01075/FUL Appeal ref: 23/00019/PP1
28 Westdown Gardens	Erection of detached garage (revised scheme to ref: 21/01789/FUL)	Delegated Decision	Written Representations Householder Appeal	Appeal Dismissed	Planning ref: 22/01679/FUL Appeal ref: 23/00012/PP1
129 – 133 Promenade	Retention of existing temporary marquees at 125, 127, 129, 131 further two year period and 133 Promenade,	Committee Decision	Written representation	Appeal Dismissed	Planning ref: 22/01373/FUL Appeal Ref: 23/00007/PP1
4 Red Rower Close	Two storey and single storey extension to the front and loft extension and dormer	Delegated Decision	Written representation	Appeal Dismissed	Planning Ref: 23/00361/FUL Appeal Ref: 23/00021/PP1

Land Adjoining Leckhampton Farm Court Farm Lane Leckhampton Cheltenham Gloucestershire	Residential development of 30 no. dwellings (Class C3); vehicular, pedestrian and cycle access from Church Road; pedestrian and cycle access from Farm Lane; highways improvement works; public open space,	Delegated Decision	Appeal Hearing (Date of hearing 18 th July 2023 (rescheduled for 12th July 2023))	Appeal Allowed	Planning Ref: 21/02750/FUL Appeal Ref: 23/00010/PP1
53 Alstone Lane	Erection of a single storey dwelling on land to rear of the existing property	Delegated Decision	Written representation	Appeal Dismissed	Planning ref: 22/02201/FUL Appeal ref: 23/00017/PP1
201 Gloucester Road	Installation of raised, split level patio area with boundary treatments (Retrospective).	Delegated Decision	Written representation	Appeal allowed	Planning Ref: 22/00022/PP1 Appeal ref: 23/00022/PP1
8 Imperial Square	Proposed change of use from C3 (dwelling house) to mixed use of C1 (hotel) and E (bar and restaurant).	Delegated Decision	Written representation	Appeal allowed	Planning ref: 22/00334/COU Appeal ref: 23/00009/PP3

Land Adj Oakhurst Rise	Outline application for residential development of 25 dwellings - access, layout and scale not reserved for subsequent approval	Committee Decision	Written representation	Appeal Dismissed	Planning ref: 22/00112/OUT Appeal Ref 23/00020/PP1
Telecommunications Mast And Cabinet CLM24981 Princess Elizabeth Way	Proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets	Delegated Decision	Written representation	Appeal Dismissed	Planning ref: 22/01937/PRIOR Appeal ref: 23/00026/PP1
6 Marsh Lane	Change of use from a single dwelling (Class C3) to a four bed House in Multiple Occupation (HMO) (Class C4)	Delegated Decision	Written Representation	Appeal Allowed Costs Decision Allowed	Planning Ref: 22/01864/COU Appeal Ref: 23/00027/PP1

REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT, ENFORCEMENT AND COMPLIANCE ON PLANNING APPEALS AND LEGAL CHALLENGES

LEGAL CHALLENGES

Address	Description	Reference	Reason
Telecommunications Mast Site CLM26627 Lansdown Road Cheltenham Gloucestershire	Installation of 15m pole inc. antennas, ground based apparatus and ancillary development	23/00551/PRIOR	Alleged lack of consideration of health grounds in granting Prior Approval

Authorised By: Chris Gomm 9th January 2024

This page is intentionally left blank

Application No.	Appeal Ref	Site Address	Appeal Type	Start Date	Questionnaire	Statement	Final Comments	Decision	Date of Decision	Costs Deci	Hearing Date	Costs awarded
21/02755/FUL	23/00001/PP1	Land at Brecon House	Hearing	10.01.2023	17.01.2023	14.02.2023	14.02.2023	Dismissed	27.04.2023	n/a	22.03.2023	
22/00839/FUL	23/00002/PP1	30 St Georges Place	written	16.01.2023	23.01.2023	20.02.2023	20.02.2023	Allowed	18.05.2023			
22/01145/FUL	23/00003/PP1	3 Apple Close	written	24.01.2023	31.01.2023	28.02.2023	28.02.2023	Allowed	19.04.2023			
22/00708/FUL	23/00004/PP1	37 Market Street	written	24.01.2023	31.01.2023	28.02.2023	28.02.2023	Allowed	19.04.2023	Allowed		4,860
20/01788/FUL	23/00005/PP1	Land at Shurdington Road	Hearing	17.04.2023	24.04.2023	22.05.2023	22.05.2023				04.07.2023	
22/01162/FUL	23/00006/PP2	101 Ryeworth Road	written	08.03.2023	15.03.2023	12.04.2023	12.04.2023	Dismissed	08.06.2023	n/a		
22/01373/FUL	23/00007/PP1	129-133 The Promenade	Written	08.03.2023	15.03.2023	12.04.2023	12.04.2023	Dismissed	17.08.2023			
22/02064/FUL	23/00008/PP1	St Edmunds, Sandy Lane	written	28.03.2023	04.04.2023	02.05.2023	16.05.2023	Dismissed	19.06.2023	Refused		
22/00334/COU	23/00009/PP3	8 Imperial Square	written	29.03.2023	05.04.2023	03.05.2023	17.05.2023	Allowed	21.11.2023			
21/02750/FUL	23/00010/PP1	Land Adjoining Leckhampt	Hearing	30.03.2023	06.04.2023	04.05.2023	18.05.2023	Allowed	12.09.2023		12.07.2023	
22/01430/FUL	23/00011/PP1	10 Suffolk Road	HAS	31.03.2023	07.04.2023	n/a		Dismissed	19.05.2023			
22/01679/FUL	23/00012/PP1	28 West Down Gardens	HAS	03.04.2023	10.04.2023	N/a		Dismissed	17.08.2023			
22/00328/FUL	23/00013/PP1	os 195 High Street	Written	18.04.2023	25.04.2023	23.05.2023	06.06.2023	Dismissed	16.06.2023			
22/00328/ADV	23/00014/ADV1	os 195 High Street	Written	18.04.2023	25.04.2023	23.05.2023	06.06.2023	Dismissed	16.06.2023			
22/00326/FUL	23/00015/PP1	23 Pittville Street	Written	18.04.2023	25.04.2023	23.05.2023	06.06.2023	Dismissed	16.06.2023			
22/00326/ADV	23/00016/ADV1	23 Pittville Street	Written	18.04.2023	25.04.2023	23.05.2023	06.06.2023	Dismissed	16.06.2023			
22/02201/FUL	23/00017/PP1	Phylnor, 53 Alstone Lane	Written	17.05.2023	24.05.2023	21.06.2023	05.07.2023	Dismissed	14.09.2023			
22/02190/PRIOR	23/00018/PP1	5G Mast, Glenfall Way	written	18.05.2023	25.05.2023	22.06.2023	06.07.2023	Dismissed	08.08.2023			
22/02075/FUL	23/00019/PP1	4 Dymock Walk, Cheltenham	HAS	26.06.2023	03.07.2023	n/a	n/a	Dismissed	09.08.2023			
22/00112/OUT	23/00020/PP1	Land adj to Oakhurst Rise	Written	24.07.2023	31.07.2023	28.08.2023	11.09.2023	Dismissed	21.11.2023	n/a		
23/00361/FUL	23/00021/PP1	4 Red Rower Close, Cheltenham	HAS	31.07.2023	07.08.2023	n/a	n/a	Dismissed	12.09.2023	n/a		
22/01964/FUL	23/00022/PP1	201 Gloucester Road, Cheltenham	HAS	04.08.2023	11.08.2023	n/a	n/a	Allowed	06.11.2023	n/a		
23/01236/CLEUD	23/00023/PP1	1 Michaelmas Lodge	Written	06.09.2023	20.09.2023	18.10.2023	08.11.2023					
	23/00024	System Error	System Error									
23/00001/DCUA	23/00025/ENFAPP	12 Pilford Road	Written	05.09.2023	19.09.2023	17.10.2023	07.11.2023					
22/01937/PRIOR	23/00026/PP1	5G Princess Elizabeth Way	Written	12.09.2023	19.09.2023	17.10.2023	31.10.2023	Dismissed	01.12.2023			
22/01864/COU	23/00027/PP1	6 Marsh Lane, Cheltenham	written	13.09.2023	20.09.2023	18.10.2023	01.11.2023	Allowed	01.12.2023	Allowed		
23/00452/COU	23/00028/PP1	218 High Street, Cheltenham	written	06.10.2023	13.10.2023	10.11.2023	24.11.2023					
23/00431/PRIOR	23/00029/PP1	Area grass verge Barley Row	written	01.11.2023	08.11.2023	06.12.2023	20.12.2023					
22/01441/FUL	23/00030/PP1	10 Selkirk Street	written	09.11.2023	16.11.2023	14.12.2023	28.12.2023					
23/01347/CLPUD	23/00031/PP1	Eagle Star Tower, Montpelier	written	20.12.2023	10.01.2024	07.02.2024	28.02.2024					

This page is intentionally left blank

2024

Application No.	Appeal Ref	Site Address	Appeal Type	Start Date	Questionnaire	Statement	<u>Final Comments</u>	Decision	Date of Decision	Costs Deci	Hearing Date	Costs awarded
23/01678/CLEUD	24/00001/PP1	The Forge	Written	03.01.2024	17.01.2024	06.02.2024						

This page is intentionally left blank