

Introduction

The Cheltenham Plan, together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, the Gloucestershire Minerals and Waste Local Plans and any neighbourhood plans made, will when all adopted comprise the statutory development plan for Cheltenham to 2031.

In a plan-led system, development plans and neighbourhood plans¹ sets out the overarching context and policies that the Council uses to shape manage and guide development in the Borough through the decisions it makes on planning applications.

The development plan also sets out higher-level objectives and aspirations that aim both to conserve what is valued and cherished within Cheltenham and to encourage development in spatial and policy areas the council wishes to promote in the public interest. Whilst the development plan is primarily concerned with land-use planning, it is very much a shared project that will support delivery of many of the Council's outcomes set out in its Corporate Strategy.

What is the Cheltenham Plan?

Since the adoption of the Cheltenham Borough Local Plan (2006) Second Review, both national planning policy and guidance has been updated and condensed into a more useful and readable form. Alongside these changes the Government has abolished regional and county strategic level planning and the Council has entered collaborative working on the Joint Core Strategy, now at an advanced stage (public examination)². These changes have meant that many of the requirements set out in regulations concerning the contents of a local plan have already been met. For example, the Joint Core Strategy identifies objectively assessed development need for the area and sets out requirements for strategic sites.

The Joint Core Strategy also contains a suite of strategic development management policies on issues as design, heritage and the provision of infrastructure. The National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG) provides detailed planning policy direction and it makes clear that this guidance should not be duplicated at a local level.

In most cases, the Joint Core Strategy partially rather than completely supersedes policy in the adopted local plan. Usually, the Joint Core Strategy picks up the strategic elements of a policy, but does not always provide local detail (although this detail may have been picked up in the Joint Core Strategy's evidence base). In some cases this detail does not need to be immediately replicated in the Cheltenham Plan, either because the detail was superfluous, as the policy will achieve the same result as before, or because the planning issues raised can be addressed through preparation or updating of Supplementary Planning Documents (SPDs) to the Joint Core Strategy or and/or informal practice or advice notes³. Furthermore, the detail may be unnecessary as it could be considered that the National Planning Policy Framework (NPPF) and the national Planning Practice Guidance (PPG) provide adequate support.

In other cases there is clearly a pressing need for Cheltenham Plan policy following closely on from the adoption of the Joint Core Strategy. This is particularly around the areas of:

¹ National planning practice guidance on neighbourhood planning

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/what-is-neighbourhood-planning/>

² <http://www.gct-jcs.org/>

³ NB: A list of current Local Plan policies which will be superseded by the JCS on has been submitted as part of the examination of the Core Strategy <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx>

1. Site allocations within the Borough (outside of the strategic allocations identified within the Joint Core Strategy) to demonstrate how Cheltenham will meet its development needs up to 2031;
2. A clear local economic strategy which will inform employment, retail and town centre uses provision in the Plan;
3. Provision for local infrastructure (particularly local green space); and
4. Local detail and strategies on heritage matters.

Bite sized approach

The Plan will be delivered over a series of documents which together will comprise the Cheltenham Plan. Because policies in the 2006 adopted Local Plan have been saved, we can continue to use policies not superseded by the JCS on its adoption which accord with the Joint Core Strategy and National Planning Policy Framework (NPPF) into the future. Therefore parts of the 2006 local plan can be replaced in stages, and as each phase of the new Cheltenham Plan is produced, part of the 2006 local plan will be superseded.

The first phase (the focus of this consultation) of the Plan focusses on land allocations, identification of local green space and the setting out of an economic development strategy for the Borough. Once this phase has been complete, other areas for development, including the wider development management policies can be pursued. The approach is one of replacing and updating the policy framework as it becomes necessary in order to most efficiently use the Council's resources and ensure continuity of planning policy cover on these issues.

This approach has the advantage of allowing flexibility in terms of revision and review in response to changing circumstances; which is an inherent feature of the Government's current planning regime, particularly in relation to the national Planning Practice Guidance. It also means that changes in local policy will not necessarily require changes to the Joint Core Strategy, because the Joint Core Strategy will only contain the 'hooks' on which Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) will be based.

Insert graphic: flow diagram of process...

The story so far...

This stage in the production of the Cheltenham Plan identifies what the council believes to be the main planning issues and policy options available to deliver the Council's vision and objectives. The Plan has to go through various stages of preparation and will be subject to examination in public by an independent inspector before it can be adopted by the council.

Work on the preparation of the Cheltenham Plan began in 2012. During this time we have engaged with the community and stakeholders to establish what the future contents of the Cheltenham Plan should be and how it should be progressed. This is part of a process known as scoping and is one step in meeting the statutory requirements for the preparation of a development plan document. The vision and objectives set out in the scope of the Cheltenham Plan were developed by the Planning and Liaison Member Working Group.

The scoping document was subject to an eight week public consultation, ending 2 September 2013. In total 52 responses were received from a range of interest groups, public and private sector bodies, and individuals. The full responses are [available to view](#), together with a [summary of the responses](#).

Gathering evidence is critical part of the plan-making process. The Cheltenham Plan is supported by a number of documents, including the sustainability appraisal, habitats regulations assessment, equalities impact assessments and other evidence studies. The sustainability appraisal and assessments evolve as the plan-making process

progresses and at this stage they have informed the content of the main document by testing each of the possible site allocations and policy options. Following the close of this consultation they will be reviewed to help inform the proposed submission version. The Cheltenham Plan is required to be supported and justified by a robust evidence base. Additional evidence has been gathered for this paper, which complements that already produced for the Joint Core Strategy; this will evolve as the Plan progresses.

Proposed Timetable for Part One

Earlier Stages:

- ✓ **Cheltenham Plan Scope Consultation** (regulation. 18) 8th July to 2nd September 2013;
- ✓ Publication of agreed **Draft Vision and Objectives** For Cheltenham Local Plan 3rd February 2014

Current Stage:

- A consultation on the **issues and options** affecting the Cheltenham Plan June 2015

Future Stages:

- **Pre-submission consultation** projected to be during Winter 2015 (*This is dependent on receipt of Joint Core Strategy Inspector's Report*)
- **Submission to the Secretary of State** projected to be during Winter and Spring 2016
- **Examination:** projected to be during Spring 2016
- **Adoption:** projected to be during Summer 2016

Content summary

The first section of this paper details the vision themes and objectives of the Cheltenham Plan. The second section details the Cheltenham economic strategy and local green spaces. Both these topics examine what is trying to be achieved, what issues have been identified (with the economic strategy specifically listing the strengths, weaknesses, opportunities and threats), potential policy approaches, policy options and questions that could be posed during consultation.

The third section comprises a series of local sites and designations. It sets out the initial ideas for site allocations for housing, employment and local green space. It asks questions to seek your views on the initial approach taken in the paper, including the site suggestions, and also asks whether other sites and proposals should be considered.

After each section we identify in **ribbon boxes** the questions we are seeking views on. Questions relate exclusively to this consultation and to the Borough of Cheltenham and do not relate to the Joint Core Strategy policies and sites which have already been subject to separate consultations.

Section one: Vision and Objectives

Following the scoping consultation in 2013 the Council published a draft vision and objectives for the Cheltenham Plan in February 2014. Local communities, businesses and visitors have helped to shape what the Cheltenham Plan should deliver and how it should be achieved (objectives). The Cheltenham Plan visions and objective should also be viewed in the context of the Council's corporate vision which is also currently being consulted on⁴. Post consultation it will be necessary to evaluate and ensure the Plan remains consistent and continues to support the aims and objectives of the Council.

Draft vision themes

1. A place where people live in strong, safe, healthy, well-served and well-connected communities;
2. A place with a prosperous and enterprising economy where employment opportunities are increasing and diversifying, and where the benefits are felt by all; and
3. A place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally.

1. A place where people live in strong, safe, healthy, well-served and well-connected communities

- Recognise the local distinctiveness of Cheltenham's various neighbourhoods and delivering regeneration where appropriate;
- Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;
- Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- Ensure that places are designed in a way that is accessible to all and promotes walking, cycling and use of public transport;
- Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities; and
- Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime.

2. A place with a prosperous and enterprising economy where employment opportunities are increasing and diversifying, and where the benefits are felt by all

- Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres; and
- Encourage the delivery of sustainable transport infrastructure, a range of transport options and better links across the borough including parking provision and public transport.

3. A place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally

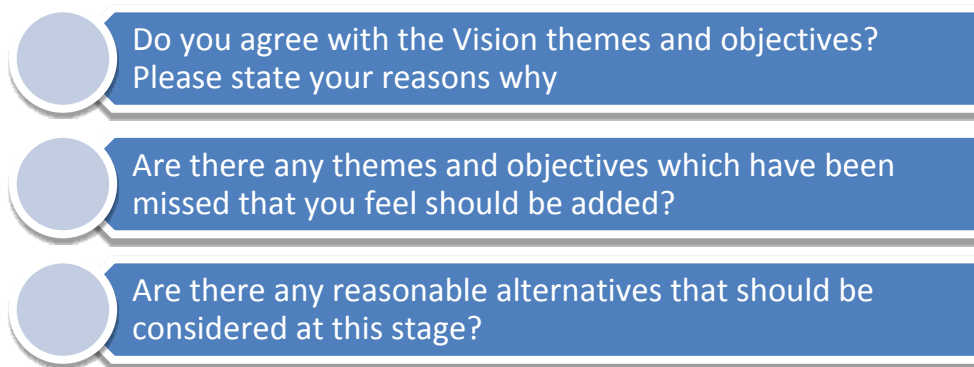
- Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;

⁴ [Insert link to consultation...](#)

- Support development of Cheltenham’s sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside;
- Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- Manage and reduce the risk of flooding within the borough.

The Cheltenham Plan will, over time, seek to contribute to all of these objectives.

QUESTIONS: Vision and Objectives



Do you agree with the Vision themes and objectives?
Please state your reasons why

Are there any themes and objectives which have been missed that you feel should be added?

Are there any reasonable alternatives that should be considered at this stage?

What are we trying to achieve?

In terms of Cheltenham economy, the following sections briefly summarise the Council's corporate and planning vision, objectives and strategies.

Cheltenham Borough Council as a whole is trying to ensure:

Cheltenham Borough Council will be *(or is currently)* consulting on a new vision and set of objectives as part of the 2015/16 Corporate Strategy. This is as follows:

- Cheltenham's environmental quality and heritage is protected, maintained and enhanced;
- Sustain and grow Cheltenham's economic and cultural vitality;
- People live in strong, safe and healthy communities; and
- Transform CBC so it can continue to deliver our outcomes for Cheltenham and its residents. This will focus on internal issues such as commissioning, asset management, business improvement and financial management.

Through related and emerging plans:

The Council is committed to proactively work with Gloucester City and Tewkesbury Councils to deliver the Joint Core Strategy with local businesses through the Cheltenham Delivery Task Force, Cheltenham Business Partnership and the Gloucestershire LEP (GFirst LEP) to develop and deliver a 'Growth Plan' for Gloucestershire.

The Joint Core Strategy's vision for Cheltenham is to continue to follow the principles that has seen it referred to as 'a town within a park', retaining its Regency character, tree-lined promenades and streets, and attractive green spaces and squares, while creating contemporary, new developments. The vision also supports the economic resilience of Cheltenham by increasing the provision of high quality, modern premises both in the town centre and in the form of a number of appropriate-scale business parks elsewhere in the borough in order to retain and attract investment;

Both the JCS and the LEP's Strategic Economic Plan identify Cheltenham as a key location for growth. The levels of economic growth on the strategic site at North West Cheltenham amounts to approximately 23 hectares whilst additional strategic growth is proposed at Gloucester and Tewkesbury. This level of growth supports the implementation of in excess of 12,000 jobs between 2011 and 2031 and forecasts suggest that this will represent an increase of 2.4 per cent Gross Value Added (GVA).

Strategic objectives seek to build a strong and competitive urban economy by providing the right conditions and sufficient land in appropriate locations to support existing businesses and attract new ones and to do so in partnership with others such as the Local Enterprise Partnership. This partnership approach will seek to provide the right environment for business start-ups, entrepreneurship, innovation and the expansion of education and training facilities to develop skills employers need;

Strategic policy aims to support employment development and economic prosperity by taking an economic-led, urban focused development approach, with the primary aim of attracting investment and development into the main urban areas and the Strategic Allocations. This strategy is designed to deliver strong, robust and resilient urban areas that create jobs and wealth.

Delivering an economic strategy for Cheltenham

In drawing up plans for the Borough national policy guides councils to set out a clear economic vision and strategy that positively and proactively encourages sustainable growth.

The Council is committed to developing an economic strategy for the Borough to increase the number of jobs and improve GVA growth. During 2014 the Council commissioned a consultancy project to assess the role of Cheltenham as a business location, which advocates possible options, ideas and actions for the Council to consider.⁵

The project was designed to support the emerging economic strategy for Cheltenham, focusing on the Borough's role as a business location. It focussed on three main components, namely an economic assessment of Cheltenham; a review of employment sites in the Borough and consultation with local businesses and land agents. From this it was possible to identify a number of key priorities and objectives for Cheltenham's economic strategy. The work goes on further to discuss potential delivery ideas and options to help achieve these.

The planning system has a clear role to support sustainable economic growth and be proactive in meeting the development needs of businesses, through development plan documents such as the Joint Core Strategy and the Cheltenham Plan.

The Cheltenham Plan will be instrumental in helping to deliver the Council's Economic Strategy. Evidence already identifies several potential implications for the Council in terms of its mode of working. Critical to the Cheltenham Plan is the need to prioritise actions to address the long term trend of the loss of employment land and the change in user requirements. In particular, delivering more modern office space and larger office facilities and establishing plans and project management teams for the urban extensions will help to ensure timely delivery of development.

Other implications that are perhaps beyond the remit of the planning system but is directly affected by it, is the need for Cheltenham Borough Council to take a visible leadership role in business engagement and develop a proactive communication strategy.

Evidence suggests there is a need to review existing planning employment policies and sites to establish if they are able to deliver its recommendations. Within this context of policy review it is important to note changes to national and strategic planning policy. Employment is now considered in a wider sense than the traditional office (B1), industrial (B2) and warehousing (B8) use classes. For example, uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care (referred to as non-B use classes in the JCS) can also be large employment providers. Sites for a care home or for car showroom (non-B employment uses) do not feature in part one of the Cheltenham Plan (and therefore this consultation) but will instead form part of part two.

Links to key local evidence:

- Cheltenham Economic Strategy (2015)
- Strategic Assessment of Land Availability (latest edition 2015)
- Annual Employment Land Monitoring Reports (latest edition 2015)
- Gloucestershire Growth Deal (2014)
- Gfirst Strategic Economic Plan (2013)
- NLP Assessment of updated economic forecasts (2014)
- JCS Review of Business Parks (2011)
- Employment Land Review (2007 and 2011)
- Retail and Leisure (2006 and JCS update 2012)

⁵ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/3

What are the Issues?

Establishing what issues affect businesses and the economic wealth of local communities is important before any discussion regarding policy review begins. This section summarises some of the key issues that you made to the scoping consultation back in 2013 and more recently a reflection of business thoughts gathered in December 2014 and January 2015; these comments have then been used to identify Cheltenham's key issues.

You⁶ and businesses⁷ told us:

- 'There is a blight of brownfield sites and shabby buildings and there should be an objective to support brownfield redevelopment';
- 'Persistent threat to the green environment from new development';
- Responses made to the scoping consultation found that safeguarding of employment land was both 'quite important' and 'not very important' issues. 'Very important issues found to be design, landscape, re-use of brownfield land, economic vitality and sustainable transport;
- 'There is a fear that Cheltenham's distinctiveness will be threatened by major growth';
- 'The Plan should support meeting the needs of young people and the unemployed';
- 'Providing sites and premises for suitable office space';
- 'Actively supporting business growth';
- 'Perception that Cheltenham is full and therefore employers are looking elsewhere';
- 'Improvements to transport and parking'; and
- 'Support the expansion of GCHQ'.

We know the key trends are:

An economic assessment of Cheltenham has revealed the following trends in Cheltenham.

- Businesses and agents confirm the attractiveness of Cheltenham's strong 'Quality of Life' Brand and is seen as a key asset in retaining existing businesses in the area;
- Cheltenham's role as location for company headquarters has become much reduced. This is partly due to business restructuring, such as mergers and acquisitions and the resultant closure and relocation of HQs;
- There is insufficient medium-to-large high quality modern office or light industrial space in Cheltenham;
- There is a large supply of office accommodation but the offer is concentrated on small premises;
- Regency office stock is converted to residential use including those locations where professional services requirements are considered to be strong;
- Cheltenham lacks a modern business park, which is something that enquirers and potential business occupants have often sought in terms of business location;
- Existing business parks and industrial parks require upgrades and improvements to attract higher value uses;
- There is a lack of 'move on' space once a firm grows to 50+ employees or 1,000 m²;
- Current office rental values are slightly too low to attract speculative developments
- There is a limited market for businesses that will custom-build their own properties. Businesses, particularly SMEs, tend to look for existing premises to rent or buy, particularly alongside similar businesses or in business parks (e.g. for higher value added activities). Without developer interest in speculative building, this may make it challenging to develop vacant sites with appropriate planning permission in the short- to medium- term;

⁶ Responses made to the scoping consultation.

⁷ During early 2015 we interviewed and held meetings with businesses, organisations and agents to discuss the opportunities and challenges facing Cheltenham's economy and its potential as a business location.

- Cheltenham is a vibrant retail location, attracting significant footfall and national retail chains as well as boutique specialised retail offers. There has been significant strategic planning and management of the retail core, which has been commended by many stakeholders;
- Growth in future premises/site uses would seem to be focused on the industries/activities of: defence industries (public administration, related to GCHQ); ICT and digital; business and professional services; retail; visitor accommodation; leisure; and light industrial.

SWOT analysis of Cheltenham's Economy

<p>We know that our STRENGTHS include:</p> <ul style="list-style-type: none"> • A significant employment location currently supporting 72,000 jobs; • High skills and education of the resident workforce, who want to stay and live in Cheltenham, meaning employers retain skilled people in jobs for longer; • Defence activities are high skill and involve ICT and digital technology; • Significant reputation and presence of professional service activities, including niche activities -defence; • Significant employers – Supergroup, GCHQ, Spirax Sarco, Kohla Mira and many others; • A successful retail centre; • Quality of life and family safety; built and living environment; • High achieving schools and low unemployment; • Architectural heritage and vibrant cultural offer; • Cheltenham Development Task Force; and • Good foundations for future joint working. 	<p>We know that our WEAKNESSES include:</p> <ul style="list-style-type: none"> • Rental values for commercial offices (at £15-16 per sq ft) are currently too low to interest property developers in providing speculative developments; • There is a lack of available premises and land for high quality office and industrial premises; • Regency buildings are perceived as mostly unsuitable and costly for office and commercial use; • It was perceived that joint working would need to intensify to ensure progress on delivering economic growth, prosperity and sustaining the borough as a quality business location; • Lack of skills provision to meet needs of local businesses; and • The role and scale of the strategic site at NW Cheltenham needs to be defined. It is a long term proposition whilst a choice of sites are required in the short term to relocate existing businesses;
<p>We know that OPPORTUNITIES include:</p> <ul style="list-style-type: none"> • Growth in defence and public admin industries; • Inward investment opportunities from supply chain to GCHQ; innovative growth SME opportunities from GCHQ procurement; • Interest from GCHQ in supporting an associated business and technology incubator; • Identifying Cheltenham as a location for certain industries and niches: brand association with fashion, retailing, cyber-security; • Taking advantage of buoyant property market and the recovering national economy to introduce new mechanisms and tactics for the management of land and development; • Undervalued town centre sites provide an opportunity for acquisition, land assembly and redevelopment to provide attractive accommodation or offer for business; and • Provision of development sites at urban extension and J10 site to offer higher value accommodation; • The need to review adopted local plan policies: EM1 Employment uses and EM2: Safeguarding of employment land. 	<p>We know that THREATS include:</p> <ul style="list-style-type: none"> • A business perception that Cheltenham is 'full' and does not support business and a lack of recognition of progress; • Limited offer in terms of large modern office space, and move-on space for growing Small to Medium Enterprises; • Housing and other locational costs; • Reliance on sites in Tewkesbury Borough to provide space for growth for Cheltenham means planning decisions and powers remain beyond Cheltenham Borough Council control; and • Lack of certainty or timeline for M5 junction 10 improvements, which will be required before any development is likely to be considered viable.

Having established the key economic trends in Cheltenham and in particular identifying the strengths, weaknesses, opportunities and threats of Cheltenham's economy it has been possible to identify the main issues affecting the local economy⁸. They are as follows:

Issue one: Achieving the growth ambitions

Bridging the aspirations and intentions of both the Joint Core Strategy and the Strategic Economic Plan is a challenge. However, to deliver both the Joint Core Strategy targets and the Strategic Economic Plan ambitions will require a significant uplift in economic performance and interventions which deliver transformational change. The evidence and case studies suggest that the higher the ambition, the greater intervention or transformational change is needed beyond business as usual.

It's clear that the Joint Core Strategy, Strategic Economic Plan and local businesses want to market the attractiveness of Cheltenham as a business location, to improve productivity (and therefore Gross Value Added performance) through developing key sectors, improving skills, unlocking infrastructure and transport constraints and providing business support. To achieve this step change in performance our evidence identifies several factors and processes which lead to economic growth, which include: entrepreneurship, comparative advantage, labour, capital inputs, capital formation and Innovation⁹.

Putting this in to the context of the Cheltenham economy the evidence shows that:

- The workforce has high skills and qualifications and high rates of entrepreneurship, yet productivity rates in Gloucestershire are below average and declining relative to comparator areas and England averages. In 2012, workers in Gloucestershire produced £26.00 of GVA for every hour worked. This was below the England average (£28.30). Between 2004 and 2012, GVA for every hour worked rose by 16%, which was lower than across England (23%). To reverse this decline we need to encourage and stimulate higher rates of innovation and capital investment to help to increase productivity, and therefore economic growth;
- Conversely, if productivity and capital investment does not increase markedly then more labour will be required to achieve the desired growth rates;
- Providing higher quality premises and sites and space for growth in Cheltenham Borough to accommodate new jobs / business activities will help to encourage economic growth;
- Retention and attraction of higher value added activities, which have higher rates of innovation and productivity, will also help to boost growth;
- There is scope to encourage innovation, market growth and productivity increases across all sectors – including retail, leisure and tourism industries which are all significant for Cheltenham. It is worth exploring this in tandem with developing and encouraging technology-related and business and professional service sectors.

Data shows that whilst the level of employment land and premises in Cheltenham has reduced over the past decade the number of jobs has increased over the same period. The apparent disconnect between the supply of land and the supply of jobs is an important observation to consider and evidence suggest that achieving growth will depend on improved productivity and the delivery of the right type of premises in the right locations.

There are other wider actions that can support growth such as high speed broadband; evidence suggests that it will be vitally important to ensure Cheltenham benefits from the continued enhancement of telecommunications and broadband infrastructure in the town, particularly roll-out of 3G and 4G mobile broadband, and enhancement of broadband accessibility, particularly in the more rural areas of Gloucestershire.

⁸ For further details please refer to our evidence study title "Cheltenham Economic Strategy: Developing Cheltenham as a business location"

⁹ See glossary for definitions

Overall this demonstrates that it is vitally important to have a clear understanding of the types of economic activity, businesses, and premises needed to achieve forecasts and projections found in the Joint Core Strategy and the Strategic Economic Plan.

Issue two: Business profile and advocacy

What is clear from our recent meetings with local businesses and business interests is that they expressed the need to improve the profile of businesses and business issues within Cheltenham, and to do this jointly with Cheltenham Borough Council. It also became apparent that businesses were often not aware or seem to fully appreciate the progress being made on development such as those implemented by Cheltenham Development Task Force, the new railway station improvements or the potential from the urban extension. In terms of a planning policy response this may not be the right tool. However, what this instead highlights is the importance of understanding and improving local businesses perception of CBC and the local planning system; this is especially important given the need to work collaboratively is a prerequisite for local economic growth and success.

Another issue relating to perceptions is that businesses consider Cheltenham is 'full', whereas the evidence does not reflect this view. It is necessary for CBC, the LEP, Cheltenham Task Force and other partner organisations to provide businesses with practical support to realise the significant opportunities from the regeneration, conversion and repurposing of existing sites and premises across Cheltenham; as well as opportunities from planned new sites in the urban extension and adjacent to M5 junction 10.

Issue three: The Cyber Security Industry

Public and private sector cyber security activities are significant for Cheltenham and present unique opportunities in terms of high value jobs and activities. In particular, GCHQ has recently restructured its supply chain which presents opportunities for Cheltenham to attract new private sector technology jobs and activities.

A Government programme called *Tech Nation – Powering the Digital Economy 2015*, presents evidence which shows that support from local and national stakeholders can accelerate the growth of technology clusters. *The report highlights the area in and around Cheltenham, Great Malvern and Hereford (styled as the UK's 'Cyber Valley') as a recognised and growing centre in the UK for the research, development and commercialisation of cyber security products and services.* There are real opportunities from expanding activities in the cyber-security sector, but also in any spin-off or associated ICT, digital and technology activities which may have a complementary use for the skills, specialisms and market contacts of the existing cyber security sector. The task will be to assess what options are available, through the planning system, to help nurture and support this potential in Cheltenham.

Issue four: Land, Property and Premises

To provide room for growth and maintain the quality of life and quality of place that makes Cheltenham unique will require the strategic management of infrastructure and land assets in Cheltenham. This will involve the active consideration of the expansion needs of existing businesses and employers such as the need for specific types of sites and accommodation (e.g. business parks, innovation/technology parks), as well as consideration of business 'life cycle' needs with respect to premises (such as move-on space for growing start-ups). It also will require the consideration of expansion or supply chain needs of large employers such as GCHQ. The quality of existing sites and premises needs to be improved, including where appropriate, support for relocation of existing businesses to new high quality locations. This may include consideration of supporting uplift in values of existing sites to residential to release investment.

Evidence suggests that existing industrial sites should be upgraded to improve their market attractiveness and offer. Upgraded sites have the potential to improve Cheltenham's Gross Value Added (GVA) performance and attractiveness to the sectors of defence/ cyber security; ICT and digital; business and professional services; retail; visitor accommodation; leisure; and light industry. An 'active' strategy for sites and land assets will help to maintain

employment levels and to reduce prospective increases in commuting frequencies and distances. The planning system will need to enable development and delivery of high quality business premises at scales that the market requires.

Competing development needs and the availability of land in the borough is also significant consideration. The need to provide new homes, infrastructure and maintain Cheltenham's highly valued open spaces and historic environment all have a direct impact on the ability to deliver new jobs.

Possible Policy Approaches and Options

Having established the main issues affecting Cheltenham's economy this section investigates the possible approaches and options available through the planning system to help deliver transformational growth in Cheltenham.

There are at least three possible types of policy approaches that can seek to remedy these four issues, these include safeguarding existing and future employment sites; secondly selective management of the economy; and thirdly promotion of cluster development. All options add further detail to the spatial strategy and policies found in the Joint Core Strategy. These options can are not exclusive of each other and could be taken forward together.

The Council has a duty to adhere to the plan-making process and in particular the need to ensure this consultation identifies reasonable policy options and delivered within the lifetime of the Plan; for example the consultation should only include options that can be practically developed as a policy. In some instances a policy approach has to make an intervention because it is guided by national policy and practice guidance to do so, therefore a "no policy" approach would not be considered reasonable.

1. Safeguarding existing and future employment land

The simplest and most typical localised addition to the Joint Core Strategy is to identify and protect local areas of employment. The Council currently operates a policy of safeguarding all existing employment land in Cheltenham, where development that results in the loss of office (B1), industrial (B2) or warehousing (B8) land or buildings is not permitted. Exceptions to the policy may be permitted where continuation of the use is undesirable on traffic, amenity or environmental grounds, or there is a demonstrable lack of demand for employment use, currently or in the future.

Despite this policy, the Council's review of employment land indicates that there have been substantial losses of employment land in Cheltenham over the last decade, much of this within office and industrial use. The review of local employment policy in the adopted Local Plan (2006) will need to consider to what extent the Council should continue this approach.

A key consideration for the Cheltenham Plan is to reflect on the long-term changes in the economy and evaluate the benefits of safeguarding and releasing employment sites for redevelopment. Factors that need to be considered when formulating safeguarding policy options include:

- Evidence shows there is a lack of any business or enterprise parks;
- Existing industrial sites should be upgraded to improve market attractiveness and offer;
- Continued lack of quality A grade office space with Jessop Avenue being the only current development opportunity within the town centre for new office space;
- There are number of significant and important businesses on single occupier sites where there are constraints to the potential expansion of those businesses at that location;
- Attractive locations for business are highlighted as Neptune Business Park and properties at Jessops Way;

- There are relatively low vacancy rates within industrial site even though some developments of average or poor quality. This could reflect the lack of availability of alternative premises;
- Ageing stock, particularly those premises that no longer meet modern business needs and single occupier sites that are adversely affected by amenity or access constraints; and
- The attractiveness of Cheltenham's strong 'Quality of Life' brand is seen as a key asset in retaining existing businesses in the area; however a lack of premises to expand into is affecting those wishing to newly invest in the Town.

Policies in the emerging Joint Core Strategy recognise that additional land should be allocated for employment uses through the Cheltenham Plan. However this must be considered in the context of National Planning Policy Framework, which says that local planning authorities should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Evidence finds that Cheltenham has a large quantum of office space but it is not enough to meet demand; the offer is mostly concentrated in small regency and older buildings (80% of premises are less than 500 m²). It also finds that the general stock of employment premises are ageing and under stress with a constant and longstanding net loss of employment uses.

In the context of reasonable options, the National Planning Policy Framework is clear that the Council should set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth and would include the setting of criteria and identification of land for employment. An approach whereby the Council does not seek to safeguard employment land is not considered a reasonable alternative. Evidence also supports this position and finds that the further loss of employment premises, especially high quality business and enterprise parks and grade A-offices will delay the ability to meet the needs of business and negatively impacting on the Cheltenham economy. The loss of employment space in sustainable locations could result in increased car use as businesses are forced to locate to offices outside the town.

Reasonable options for safeguarding employment sites and premises are set out below.

OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by policy EM2.

One option could be to continue with the policy of preventing loss of office, industrial and storage space on existing sites using the criteria currently used in adopted policy EM2: Safeguarding of employment land. The criteria currently restricts the change of use of land and buildings in existing employment use, or if unoccupied to a use outside Use Classes B1, B2, or B8 will not be permitted, except where continuation of the use is undesirable on traffic, amenity or environmental grounds, or there is a demonstrable lack of demand for employment use, currently or in the future.

There continues to be a need to maintain a diversity of employment opportunities within Cheltenham. Views from land agents and local businesses on the local economic market suggest that requirements for office and storage space are demonstrated in Cheltenham. Small workshop/incubation units are often the initial home for new businesses unable to afford higher rents and evidence shows that there is strong interest in developing specialist incubation unit facilities for cyber-security based businesses. Protection of this part of the supply chain for employment development is vitally important for the growth of the local economy.

There have been considerable losses of employment sites and premises in the past, and evidence suggests that continued loss of these uses could pose a problem in the future. It could be argued that the policy of safeguarding employment land has not succeeded in preventing the loss of premises and sites over the past decade, however this needs to be seen in the context of a continued increase in jobs over the same period and a change in the structure of the local economy. The evidence suggests there is a disconnect between the loss of traditional employment land and the supply of local jobs; clearly this is an issue to consider carefully when considering safeguarding options.

There is a continued need for a full range of local employment needs to be provided within Cheltenham. The loss of employment sites and premises in Cheltenham would mean these businesses migrate out of the town to neighbouring cities and towns; this could result in less sustainable journeys and the loss of business rates in Cheltenham.

Protecting employment sites and premises allows the Council to meet the forecast needs of business in the plan period, but may be less effective on its own in attracting new high GVA investment to the Borough.

OPTION 2: Amend the general policy of B uses only (as established by EM2) to allow other forms of economic development.

A second option could be to amend the adopted policy by adding a criterion such that loss of sites and premises in existing office, industrial and storage use is acceptable where the new use falls within a range of accepted economic development uses and/or facilitates an overall growth in jobs.

This increases flexibility and the wider definition of employment, set out by the National Planning Policy Framework and Joint Core Strategy, and provides opportunities for the redevelopment and change of use of employment sites and premises to non-traditional employment uses; this could be particularly beneficial on sites and premises where there have been persistent vacancy problems. This approach might be able to provide a more diverse range of employment activities on traditional B use employment sites.

Increasing the flexibility to change would mean that some of the best industrial sites in Cheltenham could come under increased pressure in the future. Also the Council would need to be confident that this policy would not unduly increase issues of amenity on offices, factories and warehouses, which historically have not had to contend with non B uses nearby.

Protecting employment sites and premises allows the Council to meet the forecast needs of business in the plan period.

OPTION 3: Protect the best and evaluate the rest

Evidence suggests that the Cheltenham Plan should develop a positive criteria based approach to safeguarding key assets whilst recognising opportunities to reuse and redevelop sites that no longer meet the needs of the businesses. Therefore, a third option could be to identify and designate key employment sites (assets) on the Policies Map and evaluate the potential for change of use and redevelopment on other employment sites across Cheltenham. In essence, this approach seeks to 'protect the best and evaluate the rest'.

A useful tool that can aid the process of safeguarding key assets and identify opportunities to reuse and redevelop sites is the 'Sites Typology' analysis in the Cheltenham Employment Sites Review (2015).

Site and premises that are making a significant contribution to the Council's aim of delivering new jobs and increasing GVA / productivity over the plan period to 2031 would be designated and safeguarded from changes of use to other forms of development. The policy could seek to identify specific sites of a certain size to be identified on the Policies Map, however evidence indicates that the local economy would benefit from a safeguarding policy being more focussed. For example we know that there is an extremely limited supply of small incubation units, business parks and high quality office blocks over 1,000 m², so for a policy to be effective it may be necessary for the policy to establish positive criteria based approach to safeguard key types of premises, irrespective of site size. The policy would need to consider locational factors such as market analysis identifying a strong requirement for town centre as well as greenfield opportunities for business.

Employment sites not designated on a Policies Map would be defined as 'non-designated employment sites' and could still be safeguarded against development that results in the loss employment land (to be defined by the Plan), using criteria based approach similar to the adopted local plan (2006) policy EM2. To deliver a more focussed

approach to site and premises selection. Alternatively the Cheltenham Plan would actively promote the redevelopment and change of use of particular non-designated employment sites and premises where it has been demonstrated through the plan-making process that an alternative use would bring about greater benefits.

The 'Sites Typology' is useful in this respect as it found there to be a number of sites with ageing, sometimes vacant buildings which have poor access and have constraints due to their location within primarily residential environments. The analysis also found that Cheltenham has a large quantum of office space but it is too small and ageing; and regency offices play a very important role in the quality of the environment however they are not meeting the needs of modern businesses.

Overall this policy approach would allow the Council to explore alternative uses for existing employment sites with the aim of increasing value as a strategic tool for economic growth to support existing sites, relocation or new business investments as well as improving the quality of life and environment of Cheltenham. However possible concern is that this approach could result in a degree of 'hope value' on sites outside protected employment sites, discouraging good maintenance and letting of premises, so it will be important for the Council to work actively with land owners and businesses.

Given the identified shortage of available incubation units and business parks and high quality offices, evidence suggests the Council should actively consider protecting these uses in sustainable locations within Cheltenham from changing use to alternative uses. Any loss of these types of premises will exacerbate this problem as well as hinder the ability to meet the needs of business and negatively impacting on the Cheltenham's ambition to increase its GVA and productivity. The loss of these uses in sustainable locations, especially A-grade offices in town centre locations, could also result in increased vehicular use as businesses are forced to locate to offices outside the town. Within this context the policy would need to consider policies in the Joint Core Strategy that direct offices uses to the town centre and strategic allocations.

QUESTIONS: Safeguarding existing and future employment land

- 1. Does this policy approach and option address the identified issues and what are your reasons?
- 2. Which policy option do you support and why?
- 3. Are there any points which have been missed that you feel should be added?
- 4. Are there any reasonable alternatives that should be considered at this stage?
- 5. Which sites do you think should be safeguarded for employment? (*Refer to section 3 and employment maps*)

2. Promoting one type of industry over another

There is a need to balance the growth of the economy with the protection of the Cheltenham's high quality environment and to this end the Council could introduce a policy of promoting one or several types of industry over another. This policy would therefore favour uses that have an essential need for a Cheltenham location.

Employment land in Cheltenham would be reserved for development that can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success as a centre for

cyber-security, high technology and research. However this must be considered in the context of the Framework, which says that local planning authorities should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

This approach would need to be bold and include policy restrictions that effectively restrict certain industries, for example the construction of large premises with low density jobs (e.g. large warehouse and storage units) because of their likely large land take. However, similar uses at a smaller scale that serve to widen the range of jobs available locally and diversify the economy could be supported.

This approach would need to recognise that there are some long established firms within Cheltenham who, whilst not meeting the criteria of this policy, nevertheless make a very important contribution to the economy of the town and the wider area. The growth and expansion of such firms would continue to be supported provided development is for their own use, and the scale is compatible with other aims of the Plan. Firms are likely to be encouraged to look at the existing brownfield sites and North West Cheltenham urban extension for larger scale expansion.

There are identifiable risks associated with this policy approach, these include:

- Protected sites could deteriorate further or remain dormant without investment and Council support to encourage high technology firms, and therefore the policy would have the opposite effect;
- The policy would need to be very clear that it is an enabling policy and not a preventative policy;
- The Council would need to be clear which industry sector and uses would be supported over others; and
- The policy would need to be flexible enough to react to high quality unforeseen opportunities for sites.

OPTION 5: Introduce selective management of Cheltenham's economy

One option could be to reserve new employment land in Cheltenham for uses that support the cyber security and related high technology cluster. This policy is design to intervene in the market to kick starting a cyber-security initiative in Cheltenham by reserving employment land for those uses that have an essential need to locate close to GCHQ and other high technology ICT businesses. This policy would represent a significant departure from previous employment policies and it could help focus Cheltenham's economy towards a high tech cyber-security economy and therefore help achieve the Council's aspiration for GVA growth.

Land supply in Cheltenham is limited and this policy would ensure that there is enough land for these firms and that they are not priced out of the market by more generic, and potentially higher value, uses. The Council would need to be confident that the policy would not discourage the redevelopment of ageing employment space, it will important to gather the view of the local employers and land agents to see whether a selective management policy would impact future investments. The Council would not want to inadvertently cause sub-standard and ageing employment premises not being redeveloped.

OPTION 6: No policy intervention

A second option is not to introduce selective management of the economy. The policy might discriminate against certain users, increasing costs for them and hindering them from locating in Cheltenham. This would allow the market to decide which business should locate in new employment space in Cheltenham and help reduce potential barriers to investment in new employment land if selective management was introduced.

QUESTIONS: Promoting one type of industry over another

- Does this policy approach and options address the identified issues? What are your reasons?
- What sectors do you think should be promoted ahead of others?
- Are there any points which have been missed that you feel should be added?
- Are there any reasonable alternatives that should be considered at this stage?

3. Promoting a Cyber Security cluster

Cheltenham, Great Malvern and Hereford are now recognised as the UK's Cyber Valley and it is a growing centre for the research, development and commercialisation of cyber-security products and services.

GCHQ has recently completed its plans for subcontracting and supplier arrangements for the next five to seven years, and there is a desire for increased activity and employment from subcontractors to be based, ideally, in or around Cheltenham. It also runs a small business innovation programme, which is a mechanism for procuring innovative new solutions from technology and innovation based small to medium enterprises; and evidence suggests that there is a strong interest in developing a cyber-security cluster for specialist business incubation facilities.

NPPF supports local planning authorities to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; so clearly the Council should look to support a growing and high technology global industry. The objective of this policy approach would therefore be to assist the Council to implement a cyber security business initiative.

Social interactions are a very important factor in the success of early businesses and are particularly true of the cyber-security industry. It is vitally important that businesses new and old can collaborate securely with local suppliers, GCHQ, the University and colleges and other research organisations. For this to work the Council will need to work actively with GCHQ and their contractors to map out key firms, assets and capabilities, as well as understand likely future business requirements for land, premises and skills. From a planning policy perspective the Cheltenham Plan will need to incorporate site requirements, such as security, into future plans and business parks or business quarters/zones.

OPTION 7: Introduce a cyber security cluster

The policy positively promotes the type of development the Council would like to see in Cheltenham and gives clear support to businesses which support cyber security activities. This approach is similar to the previous policy approach (promoting one type of industry over another) in that it seeks to promote a type of industry and therefore safeguard land however it differs as the policy recognises the importance of cyber security as a business activity in the town

It is designed to take advantage of the immediate opportunities that exist locally, where evidence suggests that GCHQ and its supply chain provide immediate opportunities to further promote and grow knowledge and technology based niche within Cheltenham and the wider county. There already exists in the town the need and

opportunities to provide suitable sites and premises for new or expanding suppliers to GCHQ as well as potential opportunities for existing or new Small to Medium Enterprises (SME) in this industry cluster.

A cluster policy could take several forms and for it to be successful would require intervention beyond land use planning. However within the context of planning, the policy could adopt one or more of the following approaches:

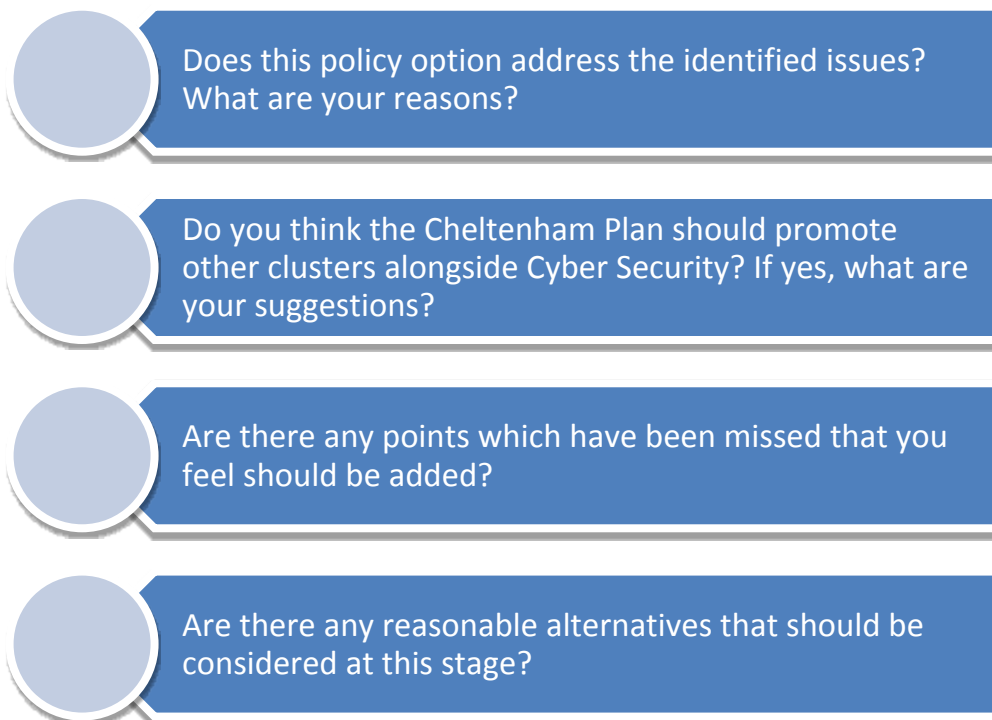
- Brand Cheltenham as the premier location in the UK for cyber security innovation and business;
- Identify specific locations in Cheltenham to help focus the delivery of specialist business parks and premises. Market evidence also supports the need to develop specialist incubation facilities;
- Create a 'virtual business park' via designated 'quarters' of the town. This approach is about creating branding and physical identity for a cyber security quarter within Cheltenham. This approach has been developed in other UK cities for example the designation of an 'International Financial Services District' in Glasgow. The Council here found it focussed property developers to provide suitable premises, with delivery of distinct public realm and signage to lead a separate identify of the central business district.

OPTION 8: Do not promote cluster development

A second option is not to introduce cluster development in Cheltenham. The clustering policy, if badly drawn or poorly applied might increase costs for other industries and hinder them from locating and expanding in Cheltenham. This approach allows the market to decide which business should locate in new employment space in Cheltenham and help reduce potential barriers to investment in new employment land if selective management was introduced.

Without intervention this approach could mean that Cheltenham misses out of the wealth and productivity created by this industry to other neighbouring areas, in particular Great Malvern and the Worcestershire area.

QUESTIONS: Promoting a Cyber-Security cluster

- 
- Does this policy option address the identified issues? What are your reasons?
 - Do you think the Cheltenham Plan should promote other clusters alongside Cyber Security? If yes, what are your suggestions?
 - Are there any points which have been missed that you feel should be added?
 - Are there any reasonable alternatives that should be considered at this stage?

What are we trying to achieve?

In terms of Local Green Spaces, the Council through its corporate vision and objectives is trying to ensure:

- Cheltenham’s environmental quality and heritage is protected, maintained and enhanced;
- Sustain and grow Cheltenham’s economic and cultural vitality; and
- People live in strong, safe and healthy communities.

The Joint Core Strategy’s vision for Cheltenham is to continue to follow the principles that has seen it referred to as ‘a town within a park’, retaining its Regency character, tree-lined promenades and streets, and attractive green spaces and squares, while creating contemporary, new developments. At a meeting of Cheltenham Borough Council on the 9th of April 2014 agreeing the Pre Submission Joint Core Strategy strategic Development Plan Document the Council resolved to:

“Designate Local Green Spaces where appropriate as part of the Cheltenham Local Plan. We would particularly wish to evaluate the potential for Local Green Space designation in Leckhampton and North West Cheltenham, where green areas of particular local significance are known to exist.”

What are the Issues?

Establishing the issues associated with Local Green Space is important before any discussion regarding policy review begins. This section summarises some of the key issues that you made to the scoping consultation back in 2013 and more recently a reflection of thoughts gathered in the Local Green Space Study¹⁰ carried out in 2014 and published in March 2015.

You¹¹ told us:

- There is a ‘need to establish a green network’;
- We should ‘reinstate Local Plan environmental objectives’;
- We should ‘strengthen approach to development affecting landscape, AONB and biodiversity’;
- ‘Water improvement and pollution prevention policies needed’;
- There is a need to ‘protect, enhance and maintain the environmental quality of Cheltenham’;
- We need to ‘listen to the views of local people’;
- ‘Communities felt strongly that all parks and public spaces should have be protected from development but accepted the position that there is a certain level of protection currently through the NPPF and that the current designation of ‘Public Green Spaces’ from the 2006 [adopted] Local Plan has been effective in preventing development of open spaces; and
- Some groups’ toolkits recommend upgrading current green spaces to the ‘Public Green Space’ designation.
- Parks such as Montpelier Gardens and Pitville Park were universally felt to be vital to the setting and character of Cheltenham.

¹⁰ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/4

¹¹ Responses made to the scoping consultation and the Local Green Space study

Planning Context

Local Green Space is a relatively new planning designation which was introduced in 2012 through the publication of the Government's National Planning Policy Framework, with further advice provided in 2014 through the publication of the national Planning Practice Guidance. It is part of a wider group of environmental designations which are designed to protect and enhance Green Infrastructure. **This designation is not be confused with 'Public Green Spaces' which is a local designation found in the adopted local plan (2006).**

Local Green Space is intended to give a high level of protection from development to green areas of particular local significance or which are demonstrably special to local communities. The government have identified the designation as an alternative to communities who might have otherwise sought 'village green' status for an area.

There has been careful consideration as to whether it would be appropriate to designate areas of Local Green Space within the Joint Core Strategy; however it is considered the designation is more appropriately applied in the Cheltenham Plan.

Although many areas can be considered for Local Green Space allocation, consideration should be given to whether the designation would in reality increase the protection already enjoyed by an area, bearing in mind that areas for recreation, parks, and playing pitches are all already protected by the adopted local plan, emerging Joint Core Strategy and the National Planning Policy Framework, as are areas in the revised Green Belt or Area of Outstanding Natural Beauty (AONB).

There are no size limits to an area which can be considered for allocation as Local Green Space, but the National Planning Policy Framework states that the designation:

- Will not be appropriate for most green areas or open space;
- (must be) demonstrably special to a local community; and
- The green area concerned is local in character and is not an extensive tract of land.

National Planning Practice Guidance states that: *"Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making."* This means the benefits of designation as Local Green Space will need to be weighed against development and other needs.

Cheltenham Borough Council commissioned Gloucestershire Rural Community Council (GRCC) to work with parishes and neighbourhood forums within the borough on the Local Green Spaces Study beginning in October 2014 and concluding in January 2015. The aim of the work was to support communities to identify and analyse potential Local Green Spaces so that these can be considered for designation through the emerging Cheltenham Plan. The commission was led by the planning and liaison member working group and supported by the Council's Community and Development team.

Gloucestershire Rural Community Council visited Parish Councils and Neighbourhood and Community groups to get their feedback on green areas in their locality that are of particular importance to local communities. To facilitate this, the Council provided a toolkit that supported communities to evaluate the merits of proposing green areas for Local Green Space, and gave them a guide to relevant evidence they could submit. Gloucestershire Rural Community Council has since reported on the outcomes of these meetings and the proposed sites can be seen on the Local Green Space plan, where sites are shaded in purple.

See section three and local green space plans for site details and questions which seek your views on Local Green Spaces in Cheltenham.

Possible Policy Approaches and Options

A Local Green Space policy needs to be considered within the Council's wider environmental objectives and of particular relevance to this consultation is the need to appreciate that this is not the only environmental policy likely to be proposed in the Cheltenham Plan. Part one focuses exclusively on the 'Local Green Spaces' and its implications, whereas part two of the Plan will examine in greater detail how it can support the provision, maintenance and continued investment in Cheltenham's high quality public realm, including formal and informal green spaces and private gardens, which contribute to local amenity and wildlife biodiversity.

Comments made to the Local Green Space study recognised that existing green space designations have been very successful in protecting them from development pressures. Local Green Space provides a further opportunity for local communities to identify and protect areas that are of value to them through the Cheltenham Plan and neighbourhood plans. Once designated, the LGS is subject to nationally recognised restrictions, and similar to the adopted local plan designations new development is ruled out unless special circumstances and material considerations indicate otherwise.

A number of Local Green Space sites have been submitted within the boundaries of emerging Joint Core Strategy strategic allocations at Leckhampton and North West Cheltenham. Where this occurs the Joint Core Strategy Public Examination will consider these submissions and the report as a whole including the toolkits has been sent to the Inspector as part of the evidence base on this issue. The Cheltenham Plan must be in conformity with the Joint Core Strategy on adoption (see flow diagram in the introduction). Therefore it is through the Joint Core Strategy examination process that these submissions will be tested.

For the remaining Local Green Space submissions, evidence and comments from the local community indicates there are at least three potential policy approaches, these include:

- Allocating all locally designated 'Public Green Spaces' as 'Local Green Spaces' and evaluating new submissions for the Local Green Space designation
- Maintaining existing local 'Public Green Spaces' and only allocating 'Local Green Spaces' that meet the Framework's criteria; and
- Maintaining the existing approach of designating local 'Public Green Spaces' but evaluating new sites submitted as part of the Local Green Space study for the Public Green Space designation;

Most of the 'Local Green Space' sites submitted to the Council are already subject to planning protection to varying degrees so it is appropriate to ask if the new designation is right for each of the locations or if other places would be more suitable for the 'upgraded' protection.

OPTION 9: Allocate all designated 'Public Green Spaces' as 'Local Green Spaces'

An issue for the Cheltenham Plan is to consider whether to include a policy for the new designation of Local Green Space introduced by the NPPF, and whether any particular spaces should be identified.

There are some similarities between 'Public Green Spaces' and the new 'Local Green Spaces' however the latter provides a nationally defined level of environment protection. 'Public Green Spaces' are considered to be suitable for the 'Local Green Space' designation so long as they can demonstrate conformity with national criteria in the NPPF. An important part of this however is that 'Local Green Space' should only be designated when an area is felt to be demonstrably special by the local community. Responses to this consultation should identify if this is the case if this option is advocated.

The effect of this policy would be upgrade all currently designated 'Public Green Space' sites, adopted by the local plan (2006), to a nationally recognised level of environmental designation and therefore award designated sites maximum protection from development.

A potential drawback of this approach is that currently the Cheltenham Plan allows flexibility with some public green space sites, such as the Public Green Space designation on the Honeybourne line. In the Cheltenham Plan this allows the Public Green Space protection for the site, but also the opportunity for a future transport scheme on the site. Identifying all these spaces as 'NPPF' Local Green Space may limit future flexibility with the sites (as the protection would mirror that of Green Belt policy).

OPTION 10: Maintain existing local 'Public Green Spaces' and only allocate 'Local Green Spaces' that meet the Framework's criteria

Evidence shows the adopted Local Plan has been successful in protecting green open spaces from development in Cheltenham and this is reflected in The Local Green Space study where local communities acknowledge the success of the policy.

This option provides the greatest flexibility as it would acknowledge local community aspirations to designate important local areas a high level of environmental protection but still ensure other public sites are still protected from development.

This option would mean that Public Green Space could be retained for most of the existing sites with this designation, and other sites identified through the study could be considered, but mean that the most valued sites such as Cheltenham's major parks could be 'upgraded' to the new protection.

OPTION 11: Maintain existing approach of designating local 'Public Green Spaces'

A key consideration for this policy approach is to ascertain the views of local communities and to establish the degree to which the Cheltenham Plan should continue to apply the adopted "Public Green Space" as a policy for protecting Cheltenham public spaces.

Because this policy is a local designation it does not benefit from the nationally recognised protection of Local Green Space and this brings with its own benefits and weaknesses. 'Local Green Space' is a national policy and therefore sites are afforded the highest environmental protection available, however protection should match that of Green Belt, in some cases this could be unhelpfully restrictive. The NPPF supports the Council to provide local designations that seek to protect existing open spaces against development unless it can be demonstrated that land is surplus to needs, the loss would be replaced elsewhere or the development is for alternative sports provision. Changes to the wording of Public Green Space policy to tailor the protection in the development plan to Cheltenham's needs would also be possible, which would be more difficult to achieve with Local Green Space.

OTHER POSSIBLE ALTERNATIVES OUTSIDE PLANNING MAKING PROCESS...

During this plan-making process it may become evident that a site is not appropriate for local green space designation. Whilst this not necessarily a planning policy option in the context of this consultation there are alternatives to 'Local Green Space' designation. These include:

Agreements with land-owners: It may be possible for local communities to reach either formal or informal agreements with the owner of the site to ensure access to the site for local people. This may be an appropriate option where the site owner has a long-term connection with the local area, for example the owner of a large historic estate. It may be possible for the land-owner to dedicate the site as "open access land". Further information: [Right of way and open access land - GOV.UK](#)

Community Purchase: In some instances local communities have purchased important sites to ensure that they remain in community control in perpetuity. The ownership can lie with the Town or Parish Council or with a specific trust.

Village Green status: Anyone can apply to register land as a green if it has been used by local people for lawful sports and pastimes 'as of right' (ie without permission, force or secrecy) for at least 20 years.

Further information: [Gloucestershire County Council](#)

Local Nature Reserves: A Local Nature Reserve (LNR) provide people with special opportunities to study or learn about nature or simply to enjoy it. Local Nature Reserves are designated by district or county councils and the Local Authority must control the LNR through ownership, lease or agreement with the owner.

Further information: [Natural England](#)

Assets of Community Value: The Community Right to Bid gives community groups a fairer chance to prepare and bid to buy community buildings and facilities that are important to them. This could include village shops, pubs or allotments. The right covers private as well as public assets. It is important to nominate land and buildings to be part of the register of 'assets of community value', which is held by the Local Authority (Cheltenham Borough Council). If something on this register is offered for sale, the community then have up to six months to prepare a bid. Further information: www.gov.uk and [My Community Rights](#)

QUESTIONS: Local Green Spaces

- Which policy option address the identified issues? What
- Which areas do you think should be designated a Local
- Are there any points which have been missed that you feel
- Are there any reasonable alternatives that should be
- Should the Cheltenham Plan continue to designate the Honeybourne line a 'Public Green Space' or should it be designated a 'Local Green Space'? Do you agree it should continue to be protected for future transport schemes?

Introduction

Section two of this consultation paper sets out the approach and an overview for employment and local green space topics which will be included in the Cheltenham Plan. Other topics such as retail, built environment, natural environment, heritage, tourism, culture and recreation and housing will be consulted on at a later stage.

When considering site options please refer to sections one and two for a full understanding of the context and work involved in producing the Issues and Options for the Cheltenham Plan, and to appreciate the link to the vision and objectives of the Plan.

Plans and site assessments for initial proposals for housing, employment and local green space can be found towards the back of this paper, plans can also be accessed on line at www.cheltenham.gov.uk/cheltplan. If you do not have access to a computer, you can use computers at libraries or at the planning reception of the Council offices. The Council can make further details available on request, but printing costs will be incurred. A hard copy will be made available at all deposit locations¹².

When considering the options you may wish to consider the strategic approach the Council should take, for example should sites be focussed on delivering housing, employment, or local green space? Or should the Council take a more balanced approach? Each approach directly affects the ability of the Cheltenham Plan to meet its Joint Core Strategy housing, employment and other requirements as well as its commitment to protect and enhance Cheltenham's open and green appearance.

How did we identify the sites?

The following processes were used to identify sites:

Strategic Assessment of Land Availability (SALA)

The Council is required to maintain a Strategic Housing Land Availability Assessment (SHLAA) this also applies to employment land as well. For this reason the JCS councils have agreed to combine housing and employment assessments in to one document, which is updated annually. It is a technical database of sites submitted, of which anyone can submit a site for inclusion in the SALA.

Sites are submitted annually through a process known as "call for sites". The Council invite landowners, organisations, land/planning agents and anyone with a local land interest to submit sites to the Council for consideration in the SALA.

It is important to note that having a site on SALA does not mean that it is automatically allocated for a housing use. Sites can only be allocated for development through the Joint Core Strategy or Cheltenham Plan. Sites in SALA create a pool from which the Council can select suitable sites to allocate for development. The SALA contains a **total of xxx** sites as at April 2014 and all sites have been examined by panel of development and land professionals.

The Cheltenham Economic Strategy and Employment Land Reviews

Supporting the preparation of the Cheltenham Plan is a report reviewing employment sites and land in Cheltenham. This report provides an assessment of the current employment premises and economic land position of the Borough and an assessment of its potential economic futures to inform the preparation of the Borough Plan. It is informed by existing evidence and intelligence, analysis of recent developments and consultations with local

¹² See page x for list of locations

businesses and land agents. The recommendations and issues identified seek to provide a series of potential implications and action points for the Borough Council for spatial planning, land allocations and property development. It forms part of the evidence base for policies and proposals in the emerging Cheltenham Plan.

The report builds upon the NLP Employment Land Review for the Borough in 2007 and 2011, Review of Business Parks 2011 and NLP Assessment of Updated Economic Forecasts 2014. This report does not replace those reports but provides new information, data and economic forecasts to ensure that the employment land demand assessments are appropriately updated to inform employment land allocations and policies in the Cheltenham Plan.

This report does not identify new land for employment but rather assesses review existing employment sites, which is useful when trying to establish, depending on the policy approach, which sites should be protected from other uses.

Site Assessments

A site assessment proforma has been used to undertake the assessment of all SALA sites (see Appendix). The site assessment process is an iterative one, in that parts of the assessment will be completed later on in the site selection process. From the initial site assessments, sites have been colour coded according to the following:

Site suitability	Description
Light Green	Has the greatest potential to be allocated for development
Dark Green	Currently has planning permission to build dwellings or employment premises
Amber	Has potential but there may be issues which need to be resolved, or the site may not be in such a favoured location as those highlighted in green
Red	Is not considered suitable for allocation for development

Residential Land Availability at April 2015

Insert commentary on 2014/15 planning commitments, this will not be available until early May.

Non-Residential Land Availability at April 2015

Insert commentary on 2014/15 planning commitments, this will not be available until early May.

Local Green Space Study

Over 110 open spaces/sites were considered by communities at the initial assessment stage and 29 of these were taken forward to full toolkit application. Communities considered factors such as threat of development, current level of protection, usage and whether it would be possible to ensure that a site was demonstrably special to the local community.

This was a community led project and information gathered will be used by the Council to consider whether sites identified by communities should be included as Local Green Spaces in the emerging Cheltenham Plan. Much like the economic strategy report the Local Green Space study suggests that Local Green Spaces will need to be considered against other competing needs; this is a focus of the Issues and Options consultation paper.

Sites for new homes

In terms of housing, part one of the Cheltenham Plan is focussed principally on the allocation of local sites in the Borough. Detailed development management policy such as houses in multiple occupation and elderly persons provision will be subject to public consultation in part two of the Cheltenham Plan, where policy approaches and options will be set out.

The Cheltenham Plan is required to help meet the housing target identified in the emerging Joint Core Strategy. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy submitted in November 2014 establishes Cheltenham is required to deliver at least 9,100 dwellings over the plan period to 2031; a significant proportion of this requirement is already committed through planning permissions already granted by the Council or is proposed to be built as urban extensions at Leckhampton and North West Cheltenham, as set out in the Joint Core Strategy. The Cheltenham Plan is therefore focussed on how the residual will be delivered to meet the Borough’s housing needs.

Policies in the Joint Core Strategy which affect local site allocations for housing directly are SP2, SD11 an SD12, SD13 and SD14. In terms of the overall housing target and spatial approach Core Strategy policies SD1 and SD2 apply. Policy SD2 is clear that the Joint Core Strategy requires the Cheltenham Plan to identify land for homes and jobs. Exact details of Cheltenham’s need and supply are due for independent examination by a planning inspector, where the outcomes are likely to influence the number of sites needed to deliver development.

It is important to remember the Joint Core Strategy requirement and therefore Cheltenham Plan’s need is not a maximum figure. It provides an indication of the likely need and is subject to examination and review over the plan period. At this stage in plan production the Council is required to present a wide range of options for local communities, businesses and organisations to comment on. This approach is critical to allow the Council to form well-reasoned and robust decisions on the types and location of development it wishes to allocate.

Gypsy, Travellers and Travelling Showpeople

Joint Core Strategy policy SD14 identifies the need to allocate sites for gypsies and travellers. In considering allocating sites for housing, we also need to identify those housing sites which are most suited to accommodating gypsies and travellers. At Issues and Options stage we are seeking the views of people as to whether they consider any particular sites being assessed for housing could be suitable for a use as a traveller site. Once we establish the level of need, receive any feedback from the consultation on Issues and Options and have carried out the traveller assessment criteria included in the site assessment proforma, the Council will consider which sites can be identified as being suitable to accommodate a gypsy, travellers and travelling showpeople site use.

QUESTIONS ON SITES PUT FORWARD TO CONSIDER FOR HOUSING

Sites coloured ‘GREEN’ on the housing maps

H1. Do you agree that the sites that have been coloured ‘green’ on the housing maps represent the most suitable sites to consider allocating for future housing development?

YES	NO
-----	----

Reason.....

H2. Which sites coloured green on the housing maps do you disagree with and why? Please state the site reference and reason

Site Reference	Reason

H3. Do you think a site that is not colour 'green' on the housing maps should have been? If so, please state the site reference and reason.

Site Reference	Reason

Sites coloured 'AMBER' on the housing maps

H4. Do you agree that the sites that have been coloured 'amber' on the housing maps represent sites with potential for allocating for future housing development?

YES	NO
-----	----

Reason.....

H5. Which sites coloured amber on the housing maps do you disagree with and why? Please state the site reference and reason

Site Reference	Reason

H6. Do you think a site that is not coloured amber on the housing maps should have been? If so, please state the site reference and reason.

Site Reference	Reason

Sites coloured 'RED' on the housing maps

H7. Do you agree that the sites that have been coloured 'red' on the housing maps are not suitable for allocation for future housing development?

YES	NO
-----	----

Reason.....

H8. Which sites coloured red on the housing maps do you disagree with and why? Please state the site reference and reason

Site Reference	Reason

H9. Do you think a site that is not coloured red on the housing maps should have been? If so, please state the site reference and reason.

Site Reference	Reason

OTHER SITES?

H10. Do you think there are other more suitable sites not shown on the maps that could be considered as future housing allocations? **If so, please supply details – address and site plan.** OS maps are preferred, but Google and Bing maps are accepted so long as we can establish the location and extent of the site.

.....

GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITES

H11. Do you think that any sites being considered in this area could be suitable for gypsy, traveller and travelling showpeople site use? Please state reason, and list site references of any specific sites.

.....
.....
.....

H12. Do you think there are other more suitable sites for gypsy, traveller and travelling showpeople not shown on the maps that could be considered for future use? **If so, please supply details – address and site plan.** OS maps are preferred, but Google and Bing maps are accepted so long as we can establish the location and extent of the site.

.....
.....
.....

Protecting existing jobs & creating new ones

In terms of employment, part one of the Cheltenham Plan focusses on two aspects: firstly it seeks to implement a new suite of development management policies, where options include (but not restricted to), safeguarding employment land, selective management of the economy and cluster development; and secondly it seeks to allocate and safeguard local employment sites in the Borough;

Section two of this consultation paper has examined existing issues and the possible policy approaches available.

This section focusses on identifying new sites for employment (site allocations) and safeguarding existing sites from change of use to other uses such as residential.

Safeguarding existing employment land

The issue of safeguarding should be read in the context of possible policy options. For example, if you believe employment sites should not be safeguarded then there is little merit identifying a site for protection in section three.

Employment maps identify a range of sites across Cheltenham that has an existing employment use. Depending on the preferred policy approach, your comments along with supporting evidence and the emerging sustainability appraisal will help the next stage of the Cheltenham Plan to identify existing employment sites in Cheltenham for safeguarding.

The Council has devised a site typology and completed a strength, weakness, opportunities and threat (SWOT) analysis against type of employment site. This will be a useful aid when reflecting on the suitability of existing employment sites for protection. You may also find it helpful to cross refer to the Cheltenham economic strategy and in particular *Appendix B: Site Analysis and Employment Land Review*¹³, which details the current evidence and intelligence on the employment land profile of the town.

For further facts, context and information on state of Cheltenham’s economy and possible planning interventions available please refer to section two and the evidence base supporting the emerging Cheltenham Economic Strategy¹⁴.

¹³ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/3

¹⁴ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/3

Attached to this consultation in Appendix A are 'site forms' providing useful descriptions and analysis of the Red, Amber and Green sites as shown on the Housing and Employment maps.

QUESTIONS ON SAFEGUARDING EXISTING EMPLOYMENT SITES

E1. Which, if any existing employment site/s (*sites coloured brown on the employment maps*) should or should not be safeguarded from change of use? Please state the reference, your preference and give reasons why.

Site Reference	Reason

Employment Site Allocations

Attached to this consultation in Appendix A are 'site forms' providing descriptions and analysis of the Red, Amber and Green sites as shown on the Housing and Employment maps.

QUESTIONS ON SITES PUT FORWARD TO CONSIDER FOR FUTURE EMPLOYMENT

E2. Do you think a site that is not coloured 'green' on the Employment Maps should have been? If so, please state which site (site ref) this is and why.

Site Reference	Reason

E3. Do you think a site that is not coloured 'amber' on the Employment Maps should have been? If so, please state which site (site ref) this is and why.

Site Reference	Reason

E4. Do you agree that the sites that have been coloured 'red' on the employment maps are not suitable for allocation for future employment or office development?

YES	NO
-----	----

Reason.....

E5. Do you think there are other more suitable sites not shown on the maps that could be considered as future employment or office allocations? **If so, please supply details – address and site plan.** OS maps are preferred, but Google and Bing maps are accepted so long as we can establish the location and extent of the site.

Site Address	Reason

Local Green Spaces

In terms of Local Green Spaces, part one of the Cheltenham Plan focusses on two aspects: firstly it seeks to collect the views of local communities on the best way to protect public green spaces across Cheltenham through planning

policy; and secondly it seek to collect views on the 29 sites identified by the Local Green Space Study and also establish if there are any other areas that should also be considered.

QUESTIONS ON IDENTIFY LOCAL GREEN SPACE AREAS

LGS1. Which, Local Green Space areas (*sites coloured purple on the local green space maps*) should or should not be designated as Local Green Space? Please state the reference, your preference and give reasons why, including evidence where appropriate. Can you identify other areas which are demonstrably special to the local community and should be considered for the designation? **If so, please provide a map** (OS maps are preferred, but Google and Bing maps are accepted so long as we can establish the location and extent of the site).

Site Reference	Reason