

# Tewkesbury Borough Council, Gloucester City Council, Cheltenham Borough Council

# Joint Core Strategy Green Belt Assessment



**Final Report** 

AMEC Environment & Infrastructure UK Limited

September 2011



#### **Copyright and Non-Disclosure Notice**

The contents and layout of this report are subject to copyright owned by AMEC (©AMEC Environment & Infrastructure UK Limited 2011). save to the extent that copyright has been legally assigned by us to another party or is used by AMEC under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report.

The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of AMEC. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

#### **Third-Party Disclaimer**

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by AMEC at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. AMEC excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

#### **Document Revisions**

No.	Details	Date
1	First Draft	March 2011
2	Second Draft	July 2011
3	Final	Sept 2011



#### **Report for**

Tewkesbury Borough Council Gloucester City Council Cheltenham Borough Council

#### **Main Contributors**

Robert Deanwood Helena Deaville Neil Hall

Issued by

Helena Deaville

Helena Deaville

Approved by

Neil Hall

# AMEC Environment & Infrastructure UK Limited

Gables House, Kenilworth Road, Learnington Spa, Warwickshire CV32 6JX, United Kingdom Tel +44 (0) 1926 439 000 Fax +44 (0) 1926 439 010

29166rr013

 $h:\projects\29166\ gloucester\ cheltenham\ \&\ tewkesbury\ green\ belt\ review\lambda lient\reports\da frequency\ lient\ lient\$ 

# Tewkesbury Borough Council, Gloucester City Council, Cheltenham Borough Council

# Joint Core Strategy Green Belt Assessment

**Final Report** 

AMEC Environment & Infrastructure UK Limited

September 2011





Certificate No. FS 13881

In accordance with an environmentally responsible approach, this document is printed on recycled paper produced from 100%

post-consumer waste, or on ECF (elemental chlorine free) paper





# **Executive Summary**

## Background

This Green Belt Assessment was commissioned by Cheltenham Borough Council on behalf of Cheltenham Borough Council, Tewkesbury Borough Council and Gloucester City Council. The three authorities are working together to produce a Joint Core Strategy, and this Strategic Green Belt Assessment forms part of the Joint Core Strategy evidence base.

The brief was to undertake a qualitative Green Belt assessment specifically focussing on an assessment against the five purposes of including land in the Green Belt as set out in Planning Policy Guidance 2: *Green Belts* (1995) and set out below:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

PPG2 sets out the national policy framework for the designation of and purposes of Green Belts and sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. There is no change to this in the Draft National Planning Policy Framework (DCLG, July 2011). The Green Belt is not a landscape designation.

This Assessment makes recommendations as to how strategic segments of the Green Belt perform against each of the purposes of including land in the Green Belt. This does not mean that there are any areas of the Green Belt that make no contribution to the Green Belt purposes, but that some areas make less of a contribution than others. Once the scale of development that is required in the short and longer term in the Joint Core Strategy Area is known, and other elements of the evidence base such as those relating to landscape, sustainability issues, and good urban design are complete, then the authorities can consider whether or not Green Belt land is required. If Green Belt land is required, then the amount of land required will need to be established taking into account longer term development requirements post 2031 in case land also needs to be safeguarded. The Green Belt Assessment and other evidence base documents will then need to be considered before a decision is made on which sites are most suitable for release from the Green Belt in the short and long term. Detailed work would then be required to establish appropriate new robust Green Belt boundaries.



This Assessment is strategic and whilst it does highlight some areas where minor Green Belt boundary changes may be appropriate, the focus is on strategic segments as the level of development required is not yet known.

## **Assessment Methodology**

The assessment methodology has been developed in response to Green Belt reviews and local Green Belt studies that have been undertaken and based on PPG2 guidance. A summary of the approach to this study is set out below:

- Mapping exercise to identify key constraints.
- Identification of strategic Green Belt segments using OS maps, aerial photos and site visits, with strong boundaries being used to define boundaries of the segments.
- Assessment of each segment against each of the five purposes of including land in the Green Belt as set out in PPG2, paragraph 1.5 (four purposes were actually assessed as the fifth purpose could apply equally to all sites so was screened out). Broad assessment criteria were identified based closely on PPG2, rather than other elements that are not referenced in PPG2 and are covered by other parts of the evidence base.
- The results of the assessment were recorded using a matrix and a simple traffic light system. An overall traffic light score was then arrived at for each segment and mapped.
- The results of the above were summarised through segments being grouped into clusters and recommendations were made for each cluster of segments. Where recommendations are made that particular segments/clusters of segments require further consideration, this does not mean that they should be released from the Green Belt, but that they could be considered further depending on development requirements and the findings of other evidence base studies.
- Consideration was given to possible areas for inclusion in the Green Belt and seven such areas were assessed against the five purposes of including land in Green Belt using the same broad assessment criteria that were used for assessing the existing Green Belt.

## **Summary of Assessment Results and Recommendations**

#### Assessment of Current Green Belt

Figure 5.2 in the main report summarises the results of the assessment against Green Belt purposes.

The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes and which should not be considered further for release from the Green Belt unless there is a very strong case emerging from other evidence base studies. These segments are:

• land between Bishop's Cleeve and Cheltenham;



- land between Cheltenham and Gloucester to the east of the M5;
- land between Gloucester and Churchdown to the west of the M5;
- land between Cheltenham and the M5 north of the A40;
- land to the west of the M5, north of the A40 and north and south-west of Churchdown;
- land to the north of Innsworth; and
- land to the west of the M5 and north of the B4063.

The recommendations in relation to these clusters of Green Belt segments that make a significant contribution to the Green Belt are summarised in Table ES1. These clusters do not merit further consideration for potential release from the Green Belt unless there is a strong case emerging from other evidence base studies.

Cluster of Green Belt Segments	Recommendation
Land between Bishop's Cleeve and Cheltenham NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981)
Land between Cheltenham and Gloucester to the east of the M5 SE2, SE3, SE4, SE5, SE6, SE10	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.
Land between Gloucester and Churchdown to the west of the M5 SW1, SW2, SW3, SW4, SW5, NW4	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.
Land between Cheltenham and the M5 north of the A40 NE1, NE2, NE3, NE4, NE5, NE6, NE7	This area is critical to preventing the sprawl of Cheltenham and towards the south, the merger of Cheltenham and Churchdown.
Land to the west of the M5, north of the A40, and north and south-west of Churchdown NW1, NW2, NW3	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, being already heavily intruded towards its southern extent with Airport related uses.
Land to the north of Innsworth NW7, NW8	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, particularly towards the east of these segments.
Land to the west of the M5 and north of the B4063 NW10, NW11	This forms the bulk of the extent of the Green Belt in this north-western quarter, with the separation function stronger towards the south and eastern area of the segments.



One cluster of segments was identified as making a contribution towards Green Belt purposes as follows:

• land north-west of Cheltenham.

The recommendation in relation to this cluster that makes a contribution towards Green Belt purposes is summarised in Table ES.2.

Table ES.2	Recommendations for Cluster that makes a Contribution towards Green Belt Purposes
------------	---

Cluster of Green Belt Segments	Recommendation
Land north-west of Cheltenham NE9, NE10, NE11, NE12	Overall, these segments make a contribution to Green Belt purposes by virtue of providing the wider setting for Cheltenham and Bishop's Cleeve, but they are not critical to the Green Belt and play a more limited role in separation of the settlements. These segments play a role in preventing encroachment, as there are some strong boundary options, but they are divorced from the urban edge. They play a role in preventing ribbon development in some areas. If land was removed from the Green Belt in adjoining segments NE8 or NE13, then segments NE9, NE10, NE11 and NE12 would still make a contribution towards the Green Belt, although it may be a more limited contribution, particularly if any development in NE8 or NE13 creates a robust new Green Belt boundary.

Three clusters of segments were identified as making a limited contribution to Green Belt purposes, and which could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:

- land to the north, east and west of Brockworth;
- land to the west of Innsworth, north of Longford and around Twigworth; and
- land to the west of Kingsditch and Swindon.

The recommendations in relation to these clusters that make a contribution towards Green Belt purposes are summarised in Table ES.3.



Cluster of Green Belt Segments	Recommendation
Land to the north, east and west of Brockworth SE1, SE7, SE8, SE9,	Intrusion of urban uses (particularly towards the east) compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re-examining its designation and boundaries as the A417 would be a strong long term boundary to prevent encroachment. Due to their enclosure on all sides by major roads, these segments serve little or no Green Belt function.
Land to the west of Innsworth, north of Longford and around Twigworth NW5, NW6, NW9	The openness of this tract is compromised by intrusive development throughout its extent. Combined with limited function in preventing the merger of towns, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries.
Land to the west of Kingsditch and Swindon NE8, NE13	Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt. These segments make a very limited contribution towards the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve.
	As it is more difficult to identify clear Green Belt boundaries within these segments, any development within the segments or parts of the segments would require strong Green Belt boundaries to be created through good masterplanning.

#### Table ES.3 Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes

#### Assessment of Potential Additions to Green Belt

The following broad areas were assessed as potential additions to the Green Belt:

- land to the south-west of Leckhampton (west/south-west of Farm Lane and east/south-east of Farm Lane;
- land to the east of Cheltenham;
- land to the north of Bishop's Cleeve;
- land to the west of the M5, north of the A4019, east of the A38;
- land to the west of Gloucester;
- land to the south-east of Gloucester, around Robins Wood Hill; and
- land south-east of Brockworth.

The case for extending the Green Belt is a limited one, with a small area of land immediately to the south of Cheltenham having the strongest case. Any Green Belt extension must be limited to those areas that make a



contribution to the five Green Belt purposes and the original purpose of designation, the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve, as PPG2 does not make any reference to increasing the area of land in the Green Belt solely to compensate for areas of Green Belt released for development. Consideration should be given to the use of other policies that can be used to prevent development, such as areas of restraint policies, open countryside policies, and limiting opportunities through careful designation of settlement boundaries.

## **Comparison of Results with Previous Green Belt Studies**

A comparison of the broad findings of the SWRA Strategic Green Belt Review (the results of which are based on the JSA work), the AERC Cheltenham Green Belt Review and this AMEC Strategic Assessment was undertaken. Direct comparison of the specific results is not possible as the parcels of land considered are not the same in all assessments.

The SWRA Green Belt report concluded that there are two areas of the Green Belt where development would have the least harm, north of Gloucester and land north-west of Cheltenham. These are two of the three areas identified in this AMEC assessment as making a more limited contribution to the Green Belt purposes. The third location identified in this AMEC report as making a more limited contribution to the Green Belt purposes, north of Brockworth was assessed as third least harm by the SWRA report, but scored more highly in the JSA work.

Another key difference between results relates to the land between Cheltenham and Bishop's Cleeve. The AMEC assessment and AERC assessments are very similar for this area, treating it as key to the original purpose of designation (as extended in 1981). However, the JSA work did not score this as highly in terms of Green Belt purposes. Other differences in results between the AMEC and AERC assessments mostly relate to the very different parcel sizes that are considered, as the AERC report only relates to land in Cheltenham Borough making direct comparison difficult.

The key reasons for differences in the results are set out below.

- The AERC study includes a number of elements that are not referenced in PPG2 in relation to the purposes of the Green Belt. The AMEC study is purely based on the five purposes of including land in the Green Belt as set out in PPG2 and does not introduce other elements which are being considered through other evidence base studies.
- The AERC study considers smaller parcels of land immediately adjoining the urban area within Cheltenham Borough's boundary, whereas the AMEC work considers all of the Green Belt in the JCS area, and thus considers larger parcels in a more strategic approach. This is because until the likely required level of development on Green Belt sites is known, the number and size of sites cannot be established. The outer boundary of the AERC parcels is purely based on the Cheltenham Borough boundary which in some areas are just field boundaries, not boundaries that would be considered to be robust long term Green Belt boundaries. No plans of particular parcels were published with the JSA work.



• The AERC work involved consultations/workshops with stakeholders to seek their views on the Green Belt. Whilst this may have been appropriate to the remit of the AERC study, this approach would not be consistent with AMEC's independent strategic assessment as stakeholders such as community groups will all have their own particular interests and are often most interested in particular localities rather than having a more independent overview. Stakeholder engagement on matters relating to the Green Belt will be undertaken as part of the Joint Core Strategy consultation, ensuring an opportunity for everyone to comment/respond to the emerging policy.

## Conclusions

On the basis of the recommendations, this study has demonstrated that there are areas of Green Belt that merit further consideration for possible release from the Green Belt, should Green Belt land be required now and in the longer term and should it be appropriate in light of the findings of the other elements of the LDF evidence base, in particular those relating to development levels, sustainable patterns of development and landscape assessment. It should also consider the need for allocating safeguarded land to prevent the need for further Green Belt review at the end of the plan period. It has also identified those parts of the Green Belt that play a significant role in meeting the Green Belt purposes and which should remain in the Green Belt unless other elements of the evidence base strongly suggest otherwise.

This strategic assessment provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the Joint Core Strategy Team. It should not be viewed in isolation, and needs to be viewed in the context of the entire Joint Core Strategy evidence base.

xi





# Contents

1.	Introduction	1
1.1	Background	1
1.2	The Study Brief	2
1.3	Structure of Report	3
2.	Policy Context	5
2.1	Introduction	5
2.2	The Gloucester/Cheltenham Green Belt and its Designation	5
2.3	National Policy	7
2.4	Regional Policy	8
2.5	Strategic Policy	9
2.6	Local Policy	10
2.7	Emerging Joint Core Strategy Area Policy	12
2.8	Local Green Belt Studies	12
2.9	Summary	12
3.	Review of Current Practice in Green Belt Studies	15
3.1	Introduction	15
3.2	Other Green Belt Reviews	15
3.3	Current Practice of Additions to the Green Belt	17
3.4	Implications for JCS Study	19
4.	Assessment Methodology	21
4.1	The Study Area	21
4.2	Methodology	21
5.	Assessment Results	27
5.1	Introduction	27
5.2	Green Belt Assessment Results	27
5.3	Recommendations	32
5.4	Assessment of Potential Additions to Green Belt	40
5.5	Comparison of Results with Previous Local Green Belt Studies	44
5.6	Summary	46



6.	Strategic	Green Belt Policies	47
6.1	Introducti	on	47
6.2	<b>Current P</b>	ractice	47
6.3	Key Cons	iderations for JCS Strategic Green Belt Policy	48
7.	Summary	and Recommendations	51
7.1	Backgrou	nd and Policy Context	51
7.2	Assessme	ent Methodology	51
7.3	Summary	of Assessment Results and Recommendations	52
	Table ES.1 Table ES.2 Table ES.3	Recommendations for Clusters that make a Significant Contribution towards Green Belt Purposes Recommendations for Cluster that makes a Contribution towards Green Belt Purposes Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes	vii viii ix
	Table 2.1 Table 4.1	Gloucester/Cheltenham Green Belt Land Use Type Broad Assessment Criteria	6 22
	Table 5.1 Table 5.2 Table 5.3 Table 7.1 Table 7.2	Segment Clusters and their Contribution to the Green Belt Purposes Evaluation and Recommendations of Clusters Evaluation and Recommendations for Areas Considered for Addition to the Green Belt Recommendations for Clusters that make a Significant Contribution towards Green Belt Purposes Recommendations for Cluster that makes a Contribution towards Green Belt Purposes	28 32 41 53 53
	Table 7.3	Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes	54
	Figure 3.1	Methodology for Green Belt Review used in Windsor and Maidenhead	18

Figure 2.1	Green Belt Extent in Context of Joint Core Strategy Area	After Page 14
Figure 2.2	Green Belt Extent	After Page 14
Figure 4.1	Strategic Segments	After Page 26
Figure 5.1	Key Constraints	After Page 46
Figure 5.2	Summary Results of Assessment Again Green Belt Purposes	After Page 46
Figure 5.3	Broad Areas for Consideration for Inclusion in Green Belt	After Page 46

- SW RSS: Panel Comments on Green Belt Areas of Search
- Local Green Belt Studies
- Review of Green Belt Studies
- Matrix of Green Belt Assessment Results
- Comparison with Results of Previous Green Belt Reviews Example Green Belt Policies
- Appendix A Appendix B Appendix C Appendix D Appendix E Appendix F



# 1. Introduction

# 1.1 Background

- 1.1.1 Tewkesbury Borough Council (TBC), Gloucester City Council (GCC) and Cheltenham Borough Council (CBC) are working in partnership to prepare a Joint Core Strategy (JCS) as part of their respective Local Development Frameworks (LDFs). This partnership approach is being taken in order to co-ordinate the strategic development of the area to 2031. The JCS will form the strategy for the scale and location of development in the area, including housing, employment, social and community facilities.
- 1.1.2 In May 2010, the Coalition Government revoked Regional Spatial Strategies (RSSs) and set out a commitment to abolish them through the Localism Bill. Following a legal challenge, RSSs have been reinstated as the Government was found to have acted unlawfully in revoking them. However, it is intended that they will be revoked once the Localism Bill comes into effect, likely to be by April 2012.
- 1.1.3 Prior to the Government setting out its intention to revoke RSSs, the Draft Revised RSS for the South West identified a level of growth for the Gloucester and Cheltenham Housing Market Area (HMA) between 2006 and 2026. The Draft also identified five broad Areas of Search to meet the growth needs of Gloucester and Cheltenham, although they actually fell within Tewkesbury Borough. Four of these areas were in the Green Belt.
- 1.1.4 The JCS authorities are now reviewing their development requirements locally as part of the evidence base for the JCS, with this work being led by Gloucestershire County Council. The evidence base is made up of a number of other documents including the following:
  - Comparative Site Assessment;
  - Employment Land Review;
  - Gloucestershire Strategic Housing Market Assessment (SHMA);
  - Gloucestershire Strategic Infrastructure Delivery Plan;
  - Green Infrastructure Study;
  - Landscape Assessment;
  - Renewable Energy Viability Assessment;
  - Strategic Flood Risk Assessment (1 and 2);
  - Strategic Housing Land Availability Assessment (SHLAA); and
  - Urban Extensions Definition Study.



- 1.1.5 This Green Belt Assessment of the Joint Core Strategy Area will also form part of the evidence base. It should be considered in the context of the entire evidence base, which the JCS authorities will use when considering which options for development to take forward for consultation. This report sets out recommendations regarding areas of the Green Belt, but it will not be until the level of development requirements are established that the JCS authorities will know the likely scale of development that may be required on Green Belt sites. It will be up to the JCS authorities to take any of these recommendations forward, or not, as appropriate based on all of the documents in the evidence base and, importantly, once the required level of development is known.
- 1.1.6 This Assessment does not consider sustainability issues or landscape issues, but is purely an assessment against the purposes and function of Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995) which are to:
  - check the unrestricted sprawl of large built-up areas;
  - prevent neighbouring towns from merging into one another;
  - assist in safeguarding the countryside from encroachment;
  - preserve the setting and special character of historic towns; and
  - assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.1.7 PPG2 sets out the national policy framework for the designation of and purposes of Green Belts and sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. The Green Belt is not a landscape designation.
- 1.1.8 This is a strategic assessment and it is not within the remit of this study to consider detailed boundary options, minor detailed amendments to the Green Belt or to consider correcting minor anomalies in the current Green Belt, although where there are obvious anomalies these are noted. These issues will again need to be considered at subsequent LDF stages when the scale of development is known and good urban design and sustainability factors are considered.

## 1.2 The Study Brief

- 1.2.1 AMEC was commissioned by Cheltenham Borough Council on behalf of the Joint Core Strategy (JCS) Authorities to undertake a qualitative Green Belt assessment specifically focusing on an assessment against the five purposes of including land in Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995). The study brief was set out by the JCS authorities with the following key objectives:
  - Demonstrate an understanding of the relevant background documents/evidence bases, and show how they have been used to inform the study.
  - Prepare a focussed and transparent methodology for assessing PPG2 criteria, reflecting best practice and taking account of the Cheltenham Green Belt review (2007).



- Review the existing Green Belt of the JCS within the context of PPG2 consider the justification for Green Belt designation in 1960 and its extension in 1981 and whether the purposes of designation are still relevant and/or whether purposes have changed and why.
- Informed by analysis and critical assessment of the JCS Green Belt; identify broad areas where the Green Belt boundary may be re-designated (including both removal and/or addition to the Green Belt) against the purposes and criteria of PPG2 with a clear justification for each recommendation. Detailed boundaries are not expected, as these will be informed by detailed analysis of housing and population projections.
- Identify, in broad terms, a defensible Green Belt boundary to 2026 and beyond in the context of the five principles of PPG2 and maintaining "*the degree of permanence that Green Belts should have*" (PPG2, paragraph 2.8).
- Prepare a suite of strategic spatial planning policies that will embed the principles of PPG2 in the JCS; including green infrastructure mitigation in areas recommended for removal from the Green Belt designation.
- Provide an executive summary of the Green Belt Review.
- 1.2.2 The study provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the JCS Team.

### **1.3 Structure of Report**

- 1.3.1 The remainder of this report is structured as follows:
  - Chapter 2 sets out the policy context including national, regional/strategic and local planning policies, and the background to the designation of the Gloucester/Cheltenham Green Belt. It also considers the previous Green Belt studies that have been undertaken.
  - Chapter 3 sets out a review of current practice in Green Belt assessments.
  - Chapter 4 sets out the assessment methodology.
  - Chapter 5 sets out the assessment results and recommendations.
  - Chapter 6 makes recommendations for consideration of strategic Green Belt policies.
  - Chapter 7 provides a summary of the study's findings and recommendations for the JCS Authorities to consider.





# 2. Policy Context

## 2.1 Introduction

- 2.1.1 This chapter sets out the policy context for the Green Belt assessment. It sets out the history and purposes of the Gloucester/Cheltenham Green Belt before considering the national, regional/strategic and local planning policy context. It goes on to consider the Local Green Belt studies that have been undertaken in the area in recent years.
- 2.1.2 Figure 2.1 shows the extent of the Green Belt in the context of the whole of the Joint Core Strategy Area.

## 2.2 The Gloucester/Cheltenham Green Belt and its Designation

- 2.2.1 The Gloucester/Cheltenham Green Belt was designated in 1968 through the County of Gloucestershire Development Plan, First Quinquennial Review. The primary purposes of the Green Belt in this location were to prevent Cheltenham and Gloucester from merging and to preserve the open character of the land between the towns.
- 2.2.2 The First Gloucestershire County Structure Plan in 1981 extended the Green Belt to include an area north of Cheltenham in order to protect the gap between Cheltenham and Bishop's Cleeve. The 1999 Structure Plan Second Review maintained the same area of Green Belt and set out the Council's continued support for the objectives of the prevention of coalescence of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve and prevention of urban sprawl.
- 2.2.3 The current extent of the Gloucester/Cheltenham Green Belt is shown in Figure 2.1 in the context of the whole Joint Core Strategy Area and in more detail in Figure 2.2. All of the Green Belt beyond the Cheltenham boundary is within Tewkesbury Borough as Gloucester City's boundary is drawn tightly around the urban area. The majority of the Green Belt is therefore within Tewkesbury.
- 2.2.4 The Gloucester/Cheltenham Green Belt is the smallest in England and covers around 6,694ha. The breakdown of land use type in the Gloucester/Cheltenham Green Belt is set out in the Table 2.1.



Theme	Hectares	%
Fluvial flood risk	496	7.4
Woodland	150	1.9
Land Quality Grades 1,2 & 3	5,858	87.5
Urban	75	1.1
Non-agricultural	120	1.8
BAP Priority Habitats	255	3.8
SSSI	48	0.7
AONB	970	14.5
Arable/Horticulture	2,149	32
Improved Grassland	2,573	38
Semi-natural grassland	944	14
Broadleaved/mixed woodland	480	7
Coniferous woodland	23	0.3
Built-up/gardens	484	7
Other	41	0.6

#### Table 2.1 Gloucester/Cheltenham Green Belt Land Use Type

Source: Natural England (2010) Green Belts: a greener future

#### Relevance of the Purposes of Designation

- 2.2.5 The main purpose of the designation of the Gloucester/Cheltenham Green Belt was to prevent Cheltenham and Gloucester, and later Cheltenham and Bishop's Cleeve from merging and to preserve the open character of the land between the town and city. The need to prevent the settlements from merging, particularly in light of increasing pressure for development in the area is still considered to be the key purpose of the Green Belt in this location today. If any land is to be released from the Green Belt, a key part of the assessment will be what its impact on the merging of the towns would be.
- 2.2.6 The Gloucester/Cheltenham Green Belt has been relatively successful in meeting the key purpose of ensuring separation between Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve. Gaps between the settlements have been maintained, although in some places they are very narrow, with a range of urbanising uses, particularly in the vicinity of Gloucestershire Airport. In the majority of areas, the open character between the settlements is maintained.
- 2.2.7 When considering potential Green Belt releases, it will be necessary to ensure that those areas that remain are critical in preventing the towns from merging and that those considered for release contribute the least to this main Green Belt purpose.



2.2.8 There is no evidence to suggest that the key purposes of the original designation of the Gloucester/ Cheltenham Green Belt should be changed or that they are no longer relevant. With increasing pressure for development on Green Belt sites, the purpose of separation is still a key consideration, particularly in those areas where the gap between the towns has already been eroded and is relatively narrow.

## 2.3 National Policy

- 2.3.1 Planning Policy Guidance Note 2 (PPG2): *Green Belts* (January 1995, amended March 2001) sets out the national policy framework for the designation of and purpose of Green Belts. PPG2 sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. It states at paragraph 1.4 that the most important attribute of Green Belts is their openness.
- 2.3.2 The five purposes of including land in Green Belts are set out in paragraph 1.5 of PPG2 as follows:
  - to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3.3 PPG2 sets out six objectives against which Green Belt land has a positive role to play, however PPG2 is clear at paragraph 1.7 that the extent to which the use of land fulfils these objectives is not in itself a material factor in the inclusion of land within a Green Belt, or in its continued protection.
- 2.3.4 PPG2 specifically identifies at paragraph 1.7 that "*the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection*". This is not taken to mean that landscape should not be a consideration in the study, but that the quality of landscape is not a reason for designation as Green Belt as there are other policy designations that can be used to protect such areas. Consideration of landscape character is used in assisting with the identification of the openness of tracts of land, topography and key features which could be used to help define firm boundaries as a perimeter or subdivision.
- 2.3.5 Paragraph 2.9 of PPG2 relates to the width of the Green Belt, which should wherever practicable be several miles wide so as to ensure an appreciable open zone all round the built-up area concerned. This does not however mean that all sections of the Green Belt should be several miles wide and that land should be included in the Green Belt simply to ensure that it is several miles wide.
- 2.3.6 A key element of PPG2 relates to timescales for proposals affecting Green Belts, and that these timescales should be longer than those normally adopted for other aspects of the plan. The guidance at paragraph 2.12 is that local authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period, in this case by 2031. Authorities are advised that this will in some cases mean identifying areas of safeguarded land which may be required to meet longer term development needs.



- 2.3.7 With regard to defining Green Belt boundaries, PPG2 states at paragraph 2.8 that it is necessary to establish boundaries that will endure, and that such boundaries should be carefully drawn so as not to include land which it is unnecessary to keep permanently open. More specifically the guidance advises that boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible.
- 2.3.8 The Draft National Planning Policy Framework (DCLG, July 2011) retains the key elements of PPG2 as set out above. At paragraph 138 it makes clear that Green Belt boundaries should only be considered when a Local Plan is being prepared or reviewed and that boundaries should be capable of enduring beyond the plan period. At paragraph 140, the draft guidance states that when defining boundaries, local planning authorities should "…not include land which it is unnecessary to keep permanently open… where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period."

## 2.4 Regional Policy

2.4.1 The Localism Bill, if enacted as proposed, will abolish Regional Spatial Strategies (RSSs). The South West RSS up to 2026 was at an advanced stage (the Secretary of State's Proposed Changes known as the Draft Revised RSS were published for consultation in July 2008), but was not approved. It therefore does not form part of the development plan, but the Government has advised that even in the absence of regional strategies, the evidence base that informed their preparation may be a material consideration. It is still therefore useful to consider the regional context, and in particular to consider the background relating to Areas of Search in the Green Belt.

#### **Draft South West RSS**

2.4.2 Section 3.3.4 of the Draft RSS refers back to Regional Planning Guidance for the region (RPG10) which identified the need to review the Green Belts in the region as proposals for development of the associated urban areas were taking shape. The context for the reviews was the need to consider sustainable patterns of growth. The RSS goes on to state that the Green Belt reviews and studies concluded that there are exceptional circumstances to justify revisions to the general extent of the Green Belt to meet development needs. Two Areas of Search, one to the north of Gloucester and one to the north of Cheltenham within the Green Belt were proposed in the Draft RSS (Policy SR12 and SR13). The Draft RSS also proposed extensions to the Green Belt to the north and north-west of Bishop's Cleeve and to the south and south-west of Gloucester. The latter area is not within the JCS area.

#### Draft South West RSS: EiP Panel Report

- 2.4.3 The Panel Report into the Draft South West RSS was published in January 2008. At paragraph 4.3.44 this clearly sets out that the Green Belt does not completely surround either settlement, and that this recognises its original purpose which was to maintain the separation between Gloucester and Cheltenham.
- 2.4.4 The Panel Report recommended a number of modifications to the Draft RSS, including increasing the Plan's housing provision and additional provision at urban extensions. The Panel identified three additional Areas of Search, land south of Gloucester, east of Gloucester and north of Bishop's Cleeve (not



in the Green Belt). Two other areas were identified to the south of Gloucester which are within Stroud District Council and are not relevant to this study of the JCS area.

2.4.5 The Panel made specific comments in relation to the Green Belt Areas of Search in the JCS Area. These are set out in Appendix A of this report.

#### Secretary of State's Proposed Changes (the Draft Revised RSS)

- 2.4.6 The Draft Revised RSS included the Panel's recommendations relating to the proposed Areas of Search at east Gloucester, north Gloucester, south Cheltenham, north Cheltenham and north of Bishop's Cleeve (non Green Belt). Housing numbers were provided for each of these Areas of Search. The Draft Revised RSS states that the Green Belt will continue to maintain the separate identities of Cheltenham and Gloucester but in order to fulfil economic potential, provision is made to alter the general extent of the Green Belt to accommodate the proposed urban extensions.
- 2.4.7 With regard to the Green Belt, paragraph 4.1.28 of the Draft Revised RSS states that:

"Green Belt will continue to maintain the separate identities of Cheltenham and Gloucester by keeping land open between them. However, necessary provision for new homes and to fulfil the SSCTs' [Strategically Significant Cities and Towns] economic potential cannot be met within the existing urban areas. The most sustainable solution is to provide for urban extensions to the SSCTs, including five locations that have been subject to a review of the Green Belt. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions".

2.4.8 The Revised Draft RSS goes on to state that the general extent of the Cheltenham and Gloucester Green Belt will be maintained subject to alterations at the Areas of Search.

### 2.5 Strategic Policy

2.5.1 As set out in section 2.4, the Localism Bill, if enacted as proposed, will abolish regional spatial strategies (RSSs). Therefore, in the absence of an adopted RSS, the Gloucestershire Structure Plan Second Review (Adopted 1999) sets the strategic policy context for Cheltenham, Gloucester and Tewkesbury up to 2011, and the policies of the Plan have been saved. Policy GB.1 of this Plan states that:

"The Green Belt between Gloucester and Cheltenham and north of Cheltenham will be maintained. Within the Green Belt only appropriate



development which would not compromise the open character of the Green Belt or which would not contribute to the coalescence of settlements will be permitted."

- 2.5.2 The supporting text to Policy GB.1 recognises that a review of the extent of the Green Belt boundaries to investigate the possibility of releasing land as a means of accommodating future development needs which cannot be met elsewhere in sustainable locations is likely to be required during the review of subsequent Structure Plans. It states that any such land should be well related to Cheltenham or Gloucester, should not result in the coalescence of settlements and is likely to be in the form of a new settlement or urban extension. It also states that any review would need to consider the scope to add areas to the Green Belt.
- 2.5.3 In 2001, work began on the Third Alteration to the Gloucestershire Structure Plan with a Deposit Draft being published in 2003. This Plan retained the Green Belt policy from the Second Review Plan as set out above. However, the Third Alteration was never adopted as there was a Direction from the Secretary of State who considered that the Plan did not implement the Panel's recommendations in relation to three policies in the draft plan. One of these related to the Green Belt policy, where the Panel had stated that "*a review of the Green Belt must be part of the implementation of this Third alteration, in order to give scope for a rational definition of boundaries for the PUAs [Principal Urban Areas] and to identify sites as part of the PUA to accept the requisite amount of growth in a sustainable way.*" This recommendation by the Panel took into account RPG 10 which required the boundaries of the Green Belt to be reviewed in the next round of Structure Plans. The Third Alteration Plan was never adopted as Gloucestershire County Council took the decision that the Secretary of State's Direction should not be complied with.

## 2.6 Local Policy

- 2.6.1 The Local Policy context consists of the saved policies of the following plans:
  - Gloucester Local Plan (Adopted 1983);
  - Cheltenham Borough Local Plan Second Review (Adopted 2006); and
  - Tewkesbury Borough Local Plan (Adopted 2006).

#### Gloucester Local Plan (Adopted 1983)

2.6.2 Due to the local authority boundaries being so tightly drawn around the edge of the urban areas, none of the Green Belt land surrounding Gloucester falls within Gloucester City Council's area.

#### Cheltenham Borough Local Plan Second Review (Adopted 2006)

2.6.3 The Green Belt land that is within Cheltenham Borough is that which is immediately adjoining the urban area. The other significant designation is the Cotswold AONB which accounts for around 22 per cent of



the land in the Borough (the Green Belt accounts for around 17 per cent). All of the policies of the Cheltenham Borough Local Plans Second Review are saved beyond 2009.

2.6.4 The Cheltenham Borough Local Plan makes reference to national policy on Green Belts and its policies re-iterate the relevant sections of PPG2. Policy C06 relates to development in the Green Belt, Policy C07 relates to rebuilding or replacement dwellings in the Green Belt, Policy C08 deals with dwelling extensions in the Green Belt and Policy C09 relates specifically to development at Cheltenham Racecourse and states that:

"Development at Cheltenham Racecourse, including extensions will only be permitted where it: (a) is principally horse racing related, and (b) does not extend beyond the confines of the built up area (the extent of the building up area is set out in the Plan)".

#### Tewkesbury Borough Local Plan up to 2011 (Adopted 2006)

- 2.6.5 A number of the policies in this plan have been saved post 2009. The Plan states that the Green Belt has been successful in terms of retaining openness and restricting urban sprawl and inappropriate development.
- 2.6.6 The Plan recognises that due to the way in which the Green Belt constrains the areas peripheral to Cheltenham and Gloucester, this provides the justification for the exceptional circumstances through which land may be released from the Green Belt for development, as recommended by the Inspector at the Local Plan Inquiry. The exceptional circumstances identified in the plan can be summarised as follows:
  - The need to allocate sufficient sites in the Principal Urban Areas (PUAs) to meet RPG10/Structure Plan requirements and lack of appropriate sites which meet locational criteria and dwelling residual requirement.
  - Aspects of certain Green Belt sites proposed for allocation contribute to the justification for their allocation.
  - The RPG requirement to critically review the Green Belt and to remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements. The Plan considered this up to 2011.
- 2.6.7 The Plan states that it is unable to meet its housing requirements without the use of Green Belt.
- 2.6.8 Policy GRB1 is the only one of the Green Belt policies to be saved. This policy reflects the guidance in PPG2 as to what type of development is appropriate in the Green Belt. Policy GRB2 and GRB3 which have not been saved set out 11 sites which were to be removed from the Green Belt and ten sites that were to be added to the Green Belt. The latter was to remove some anomalies (resulting from the previous three separate plans that defined the Green Belt boundaries) and to create well defined long term boundaries.



# 2.7 Emerging Joint Core Strategy Area Policy

2.7.1 Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are now working together to produce a Joint Core Strategy (JCS) as part of the Local Development Framework (LDF) process. There has already been consultation on key issues, and the next stage of public consultation will be on developing options in Autumn 2011. This Green Belt study will form part of the evidence base for the JCS and along with other key documents relating to matters such as the development requirements of the area, landscape assessment and sustainability appraisals, will inform decisions on whether or not it is necessary to release sites from the Green Belt, and if so, which sites would be more appropriate than others.

### 2.8 Local Green Belt Studies

- 2.8.1 The Gloucester/Cheltenham Green Belt has been the subject of several studies over recent years, as follows:
  - Strategic Green Belt Review; South West Regional Assembly (SWRA) February 2006;
  - Cheltenham and Gloucester Joint Study Area Green Belt Review: Strategic Re-Assessment of the Green Belt;
  - Cheltenham Green Belt Review; AERC March 2007; and
  - Gloucester, Cheltenham & Tewkesbury Urban Extensions Boundary Definition Study, Entec 2010.
- 2.8.2 Appendix B of this report sets out further details of the content of these studies that have been reviewed.

### 2.9 Summary

- 2.9.1 The Gloucester/Cheltenham Green Belt was designated to prevent the towns and city from merging and to preserve the open character of the land between them. The Green Belt was later extended to also protect the gap between Cheltenham and Bishop's Cleeve. There is no evidence to suggest that the original purpose of the Green Belt should be re-considered, and the maintenance of the gap between the towns is still considered to be the key purpose of the Green Belt in this location, and this is particularly the case in those areas where the gap between the towns is relatively narrow.
- 2.9.2 PPG2: *Green Belts* sets the national policy framework for Green Belts and clearly states that their most important attribute is their openness. PPG2 identifies the five purposes of the Green Belt as follows:
  - to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and

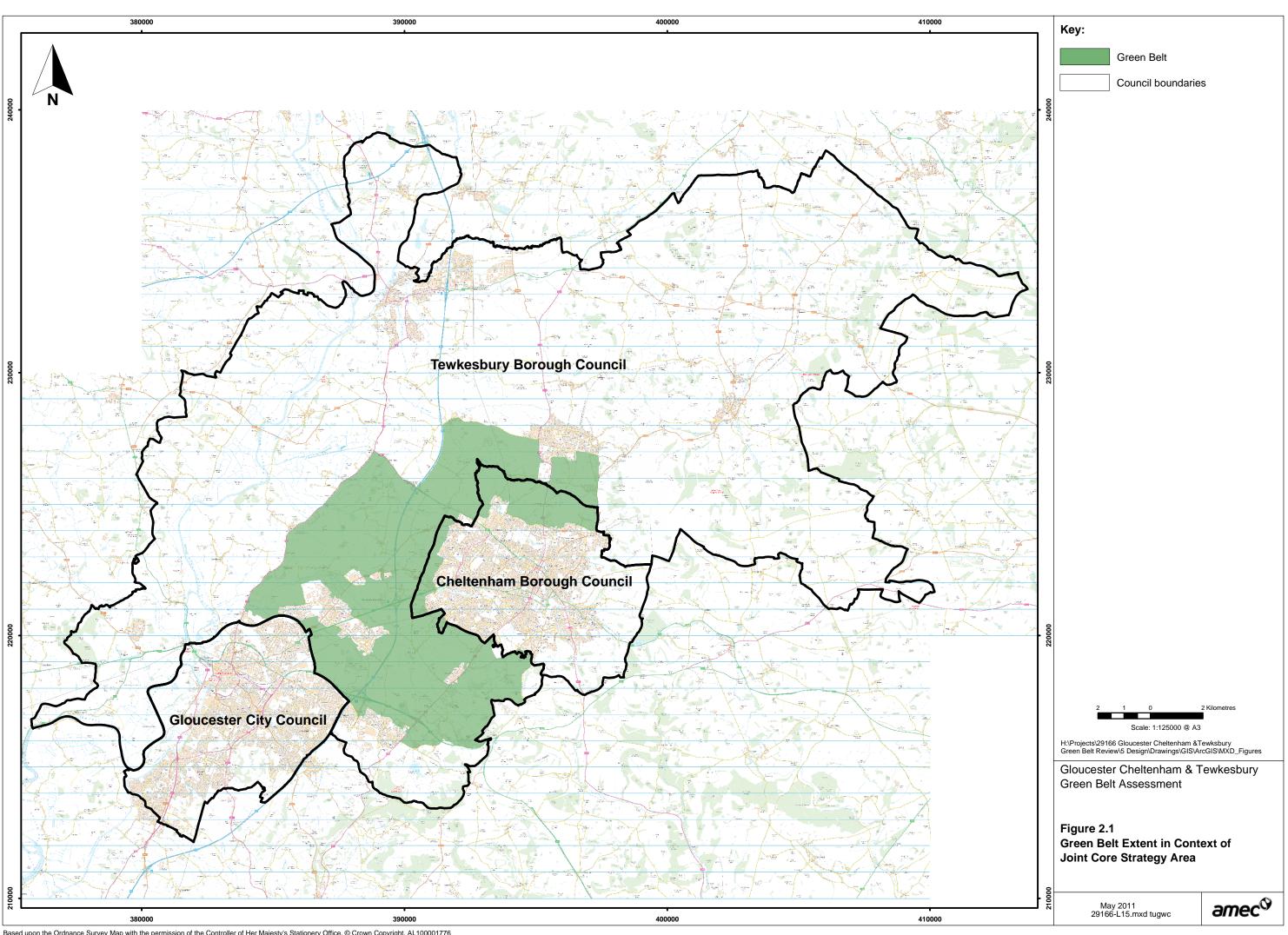


- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.9.3 These purposes form the basis of this Green Belt assessment, the remit of which is to assess how different parts of the Green Belt perform against the above purposes and in doing so identify those areas that contribute the least and should be considered first for release in Green Belt terms. Of key importance to the assessment is the main purpose of designating the Green Belt in this location, the need to maintain separation between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve.
- 2.9.4 This section for the report has set out the regional, strategic and local policy context that applies to the Gloucester/Cheltenham Green Belt.

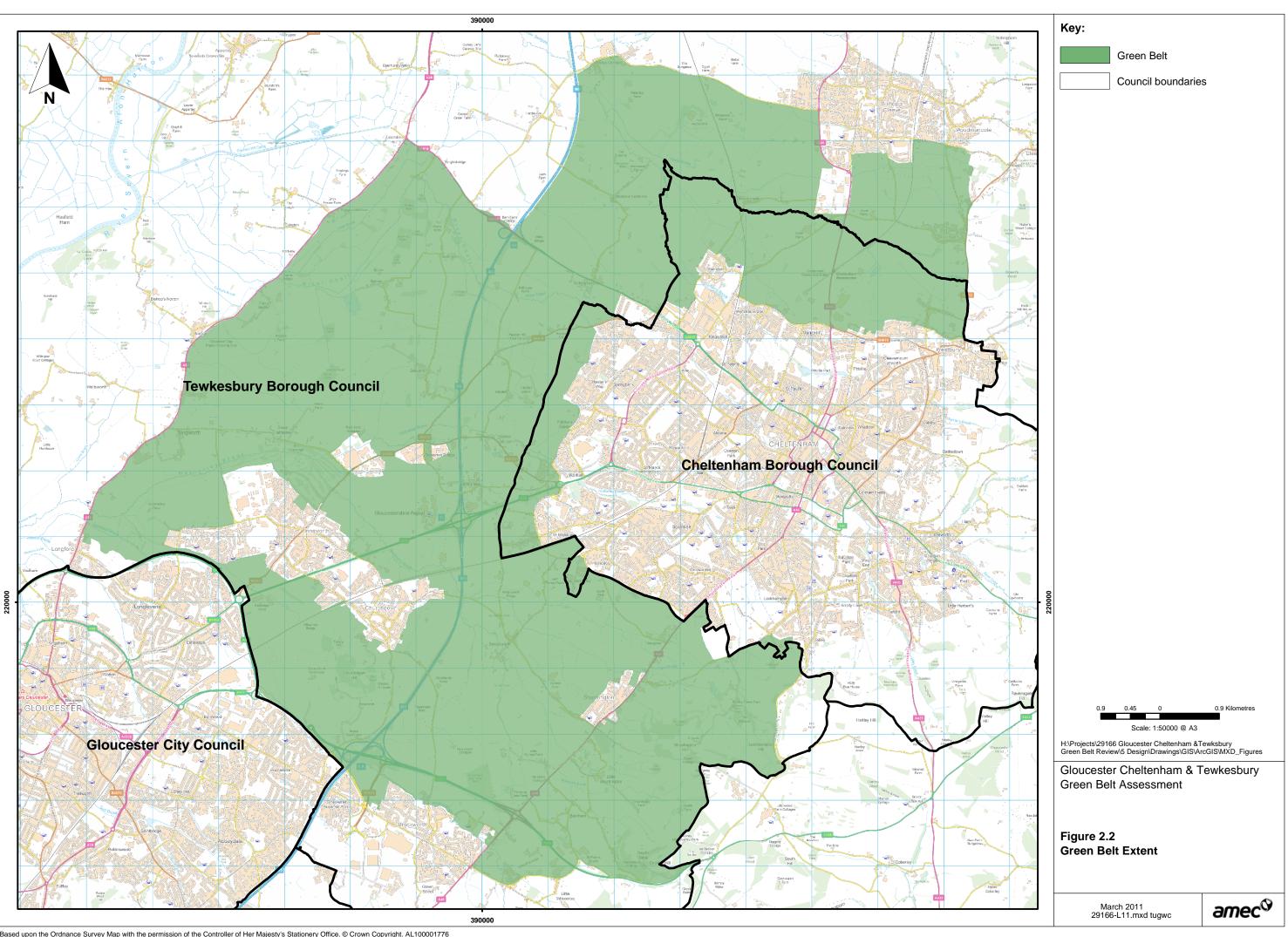








Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office. © Crown Copyright. AL100001776





# 3. Review of Current Practice in Green Belt Studies

### 3.1 Introduction

3.1.1 The purpose of this section of the report is to provide an overview of the findings of our review of current practice regarding Green Belt reviews and to consider the implications for the JCS study methodology and approach. This section also considers examples of where additional land has been considered for inclusion in the Green Belt.

### 3.2 Other Green Belt Reviews

- 3.2.1 The JCS Urban Extensions Boundary Definition Study reviewed best practice in the development of a methodology for appraising Green Belt sites. This review included studies undertaken in Nottingham/ Derby, Purbeck, Cheltenham and Coventry, a summary of which is set out in Appendix C. The findings of this review indicated that all had focused predominantly on assessing land against the five purposes of the Green Belt, utilising a scoring/grading system to indicate the relative Green Belt 'value' of land prior to identifying 'defensible' boundaries. However, there was no consistent approach used to assign grades/scores to the Green Belt areas. Some reviews adopted a commentary based approach (e.g. Purbeck and Nottingham Derby) whilst others have drawn together Green Belt and sustainability criteria (e.g. Coventry) leading towards the use of weighted criteria (Cheltenham). Some have assessed very small areas of land, used relatively complex weighting criteria, and sometimes considered factors that are not identified in national guidance, when PPG2 does not specifically make any reference to the relative importance of the five purposes of including land in the Green Belt. The studies identified were generally undertaken at a broader, more strategic spatial scale focussing on identifying areas where boundary review may be appropriate or preferred.
- 3.2.2 Since publication of the JCS Urban Extensions Boundary Definition Study (July 2010), there appear to have been no new studies, apart from the updating of existing work, notably the Purbeck Green Belt Review (October 2010). This extends the study (using the methodology reviewed previously) to appraise a number of settlement extensions identified following public consultation. A traffic light approach is used, with potential boundary changes shown on maps and recommendations made for which sites or parts of sites should be released.
- 3.2.3 The Knowsley and Sefton Green Belt Study is currently being undertaken. Its methodology consists of four stages:
  - Stage 1 Identification of broad sections and parcels, in turn subdivided into smaller parcels for more detailed assessment. Parcels are identified according to:
    - similar character and land use;
    - similar impact on the openness of the Green Belt; and
    - clearly defined by durable, significant and strong physical boundaries where possible, both existing and proposed.



• Stage 2 Testing against the five purposes of including land in the Green Belt as set out in PPG2 using a mixture of quantitative and qualitative evaluation, including scoring of fulfilment of Green Belt purpose (A - contributes significantly; B - limited contribution; and C - no contribution). In appraising the purpose of Green Belts, the following criteria are used:

Purpose	Criteria
To check the unrestricted sprawl of large built-up areas	The extent to which existing development affects the openness of a parcel
To prevent neighbouring towns from merging into one another	The width of the strategic open gap between urban areas
To assist in safeguarding the countryside from encroachment	Does the use of the parcel meet one of the objectives for including land in the Green Belt (PPG2 paragraph 1.6) or is it in a defined countryside use (PPS7 paragraph 16)
To preserve the setting and special character of historic towns	Whether a parcel helps preserve the setting and special character of an historic town, village or park
To assist urban regeneration by encouraging the recycling of derelict and other urban land	Whether development in the parcel would be likely to divert development away from identified regeneration areas

- Stage 3 Assessment of those parcels not judged to be critical against identified constraints and positive attributes using a scoring system weighted to connectivity to the urban area, with a map showing parcels with potential.
- Stage 4 Assessment of capacity and establishing triggers for future release, through allotting each parcel to a particular settlement with a further qualitative assessment of each of the parcels or groups of parcels, particularly against issues which could affect their deliverability and viability.
- 3.2.4 It could be questioned whether the above approach is entirely consistent with PPG2. For instance the criteria identified for the third purpose in the table above refers to whether or not the land meets the objectives for including land in the Green Belt (paragraph 1.6 of PPG2). PPG2 makes clear at paragraph 1.7 that "the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt". The first criteria relates to the openness of a parcel, but development by its nature removes openness, and it is not clear how this relates to sprawl.
- 3.2.5 A recent supplement to the Coventry Green Belt Review of 2009 explored the qualities of specific areas previously identified as having potential for release. A detailed appraisal against a suite of factors including ecology, land quality, landscape character and sustainability was undertaken. Again this study would appear to go beyond Green Belt assessment against the five purposes using factors that are not relevant to designation.
- 3.2.6 A Green Belt Review undertaken by Calderdale MBC (November 2008) as part of their Core Strategy evidence base sought to appraise the validity of the current Green Belt and adjacent areas and whether the boundaries were adequate and defensible. The methodology used a three-stage process as follows:
  - Stage 1 Initial Sieving used 500m squares to remove areas of nature conservation value and which had a high sustainability score (derived from a settlement hierarchy model), yielding broad areas for investigation.



- Stage 2 Site Identification involved identifying sites (using aerial photographs) within the broad areas of search according to:
  - similar character and land use for Green Belt purposes;
  - not crossing significant boundaries such as motorways, rivers or protected woodlands;
  - taking account of changing landscape and landform; and
  - being smaller in area where they are located close to existing boundaries.
- Stage 3 Site Testing employed an impact scoring of 1 to 5 and weighting against Green Belt purposes and various derived assessment criteria, as follows:

Purpose	Criteria
To check the unrestricted sprawl of large built-up areas	Impeded ribbon development
To prevent neighbouring towns from merging into one another	Distance from built up area
To assist in safeguarding the countryside from encroachment	Nature and geological conservation value Accessibility of communities to the countryside Trees/woodland Agriculture
To preserve the setting and special character of historic towns	Preserve the character and setting of the historic core of towns In a Conservation Area/Historic Park or Garden
To assist urban regeneration by encouraging the recycling of derelict and other urban land	Excluded as Green Belt land is considered to contribute equally to fulfilling this purpose by encouraging development in the urban area to an equal extent.

3.2.7 Again the above approach is not considered to be entirely consistent with PPG2. The second criteria above, distance from built up area is not considered to be relevant as larger gaps can still be key to preventing the merging of towns in some locations. The third criteria set out above are not considered to be relevant to encroachment and there is no reference to these criteria in PPG2. It would appear that a number of studies have struggled to define sprawl and encroachment and hence considered factors not strictly consistent with PPG2.

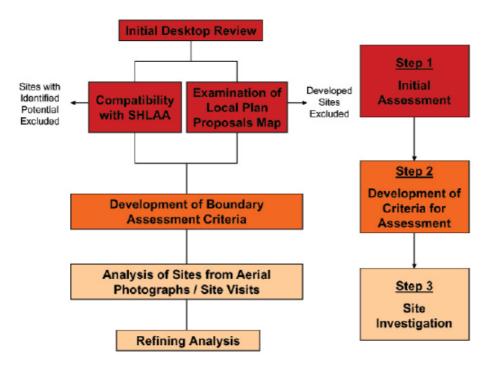
## 3.3 Current Practice of Additions to the Green Belt

- 3.3.1 There are very few examples of Green Belt studies that have resulted in strategic/significant additions to the Green Belt either as compensation for land that is removed from the Green Belt or simply as additions.
- 3.3.2 As part of a wider review of development capacity, the Borough of Windsor and Maidenhead undertook a review in March 2009 of detailed Green Belt boundaries around excluded settlements in order to clarify their precise extent and recommend additions to the Green Belt. Previously, boundaries were drawn



loosely, to include open spaces, which resulted in a lack of definition between the areas in the Green Belt and areas in the settlement. In order to correct this and the general lack of consistency in boundary definition and to more closely accord with PPG2 that boundaries should follow clear features on the ground, the following method was followed.





- 3.3.3 The methodology for boundary definition consists of two steps. Step 1 specifies that boundaries should always try to follow a permanent physical feature on the ground that creates a logical, strong and defensible boundary. The order of preference of these features is:
  - a road edge; typically the road should be included within the settlement unless a more logical line would include the road in the Green Belt;
  - a building line that provides a straight logical line and clearly represents the edge of the urban area;
  - a pathway, stream, ridge, car park, playground or other physical feature;
  - an ownership boundary marked by physical features such as a hedgerow or a fence-line; or
  - in the absence of any physical features to follow on the ground to provide a straight line between two permanent physical features.



- 3.3.4 Where a lower preference is chosen for the boundary, there must be a logical reasoning for this; for example higher preferences fail to protect open spaces, or create irregularities in the overall boundary of an Excluded Settlement.
- 3.3.5 Step 2 notes that where there is an open space at the edge of a settlement, it will generally be incorporated into the Green Belt, but only where a new logical boundary can be drawn using the features in Step 1. If the space is dominated by a building or would replace a strong, logical boundary with a weak, illogical one, this change will not be appropriate.
- 3.3.6 It is noted that the approach only seeks to amend minor irregularities to the boundary and will not alter large areas. The result of the exercise was the identification of an additional 55ha at 25 sites recommended for inclusion in the Green Belt. These additions have not yet been taken forward through Examination or included in an adopted Core Strategy.

### 3.4 Implications for JCS Study

- 3.4.1 Given the strategic nature of the current study, and as noted in the Urban Extensions Boundary Definition Study, the locality-specific assessment using overly complex weighting criteria, factors that are not identified in national guidance, and of sometimes very small areas, is not always helpful. These approaches also add weighting when no such priority exists in PPG2. Keeping the methodology straightforward allows a maximum degree of clarity, aiding subsequent interpretation of more detailed Green Belt boundaries and judgements regarding the release of land.
- 3.4.2 A number of studies have struggled with defining certain purposes, particularly those relating to encroachment and sprawl. The SW RSS Panel Report noted in relation to this that in practice, unrestricted sprawl and countryside encroachment are limited by the combined presence of the flood plan and the Cotswolds AONB.
- 3.4.3 A number of studies have gone further than pure Green Belt assessment by considering sustainability, landscape and ecological issues. Whilst this is useful when considering which individual sites may be more suitable for release from the Green Belt, this is not considered to form part of an assessment of the five purposes of including land in the Green Belt. It may also confuse judgements about the relative importance of Green Belt purposes. Green Belt is not a landscape quality or policy designation, and the main aim of Green Belt policy is to prevent urban sprawl and keep land permanently open. That is not to say that landscape is not a consideration, but it should not be a key consideration in terms of assessment against the five Green Belt purposes. It suggests that these 'additional' factors should be considered as a discrete exercise that can be combined later with the Green Belt review to determine the most appropriate locations for development with a balanced judgement of protecting Green Belt purposes and achieving the most sustainable patterns of development.
- 3.4.4 Studies re-examining Green Belt boundaries in detail (such as that of Windsor and Maidenhead noted previously) are helpful in providing a comparator for checking the robustness of Green Belt boundaries, which is useful in identifying areas for potential release but also extensions. From our research it is clear that major additions to the Green Belt are not common, perhaps because in most cases land that met the five purposes of including land in the Green Belt was included in the original designation. However, if there are areas that were not originally included, but that do meet the five Green Belt purposes then they should be considered for inclusion. The assessment method for considering additions to the Green Belt should be the same as for considering possible land to be removed from the Green Belt. PPG2 does not



make any reference to 'compensatory' additions to the Green Belt. With regard to proposals for new Green Belts, PPG2 states at paragraph 2.14 that local authorities should demonstrate why normal planning and development control policies would not be adequate, and whether any major changes in circumstances have made the adoption of this exceptional measure necessary. This need to demonstrate why other planning policies are not sufficient could equally apply to major additions to an existing Green Belt.



# 4. Assessment Methodology

## 4.1 The Study Area

4.1.1 A key objective of the study brief is to review the existing Green Belt of the JCS area in the context of PPG2 and the five purposes of including land in the Green Belt. The extent of the Green Belt within the JCS area is shown in Figure 2.1. This study only covers Green Belt that falls within the administrative areas of Tewkesbury Borough, Cheltenham Borough and Gloucester City. The study considers all parts of the Green Belt, including the inner and outer boundaries and also settlements that are within the Green Belt. However, due to the nature of the Green Belt in this area, there are certain areas which do not need to be considered in great detail as their role in meeting the purposes of the Green Belt and the key purpose of designation, separation, is very clear. The study is strategic in nature which is appropriate at this stage of the Core Strategy development. The most appropriate detailed Green Belt boundaries cannot and should not be identified until the level of development, likely densities, sustainable development considerations and land take is known and until other elements of the evidence base have been completed.

## 4.2 Methodology

- 4.2.1 The initial stages of this study were to review relevant policies at the national, regional, strategic and local levels and to consider the original purposes of designation of the Gloucester/Cheltenham Green Belt. This was followed by a review of the local Green Belt studies that have been undertaken in the area in recent years and a review of current practice elsewhere, updating the work that was undertaken as part of the Urban Extensions Boundary Definition Study. This informed the methodology for this study.
- 4.2.2 The approach set out below was taken to identifying and assessing how far Green Belt purposes are fulfilled across the JCS area and the relative contribution that each area makes.

## Mapping of Key Constraints and Strategic Green Belt Segments

- 4.2.3 This involved a mapping exercise to identify key constraints, such as AONB, areas at risk of flooding and nature conservation designations. This data was provided by the JCS authorities in the form of GIS data. This mapping of key constraints has primarily been undertaken to set out the context for other considerations in addition to the Green Belt. Some of the constraints may prevent certain types of development in particular areas, such as an area at risk of flooding. Other constraints may not preclude development but will impact on design and therefore potentially affects the developable area of the site which will have implications when the likely Green Belt land requirements are known.
- 4.2.4 Following the mapping of constraints, strategic Green Belt segments were defined by using OS maps, aerial photographs and site visits to identify significant boundaries for segments of broadly similar character. The strongest strategic boundaries such as roads, railways, watercourses and hedge/tree-lines were used to assist in identifying the segments. Forty eight separate Green Belt segments were identified. For ease of analysis these were split into four quadrants, defined by the intersection of the M5 with the A40 and labelled SE, SW, NW and NE (see Figure 4.1). The appraisal of strategic segments allows for the subsequent identification of single, or groups of, segments which can be further analysed.



## Assessment of Segments against Green Belt Purposes

- 4.2.5 This involved an assessment of the role of each segment in fulfilling the five purposes of including land in Green Belts (section 1.5 of PPG2) as set out below:
  - to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.2.6 The fundamental aim of Green Belt policy is to keep land permanently open (PPG2, paragraph 1.4). This therefore is a key consideration in the overall assessment of each site, as openness is so critical to the Green Belt. The Draft National Planning Policy Framework (DCLG, July 2011) retains the five purposes and fundamental aim as set out in PPG2.
- 4.2.7 PPG2 does not define the five purposes further or set out how they should be assessed, although it clearly does not give any particular weighting to the different purposes. Table 4.1 sets out the broad criteria that have been used in this assessment of how each segment meets the five Green Belt purposes.

Green Belt Purpose (as set out in PPG2)	Broad Criteria used in Assessment
To check the unrestricted sprawl of large built-up areas	What role does the segment play in preventing ribbon development and non compact development?
To prevent neighbouring towns from merging into one another	What role does the segment play in preventing Gloucester and Cheltenham and Cheltenham and Bishop's Cleeve from merging and narrowing the gap between them?
	Would a reduction in the gap between the towns compromise the openness of the Green Belt land?
	What is the width of the gap?
To assist in safeguarding the countryside from encroachment	Are there clear strong and robust boundaries to contain development and prevent encroachment in the long term?
	Are there already significant urbanising influences?
	Has there already been encroachment by built development?
To preserve the setting and special character of historic towns	Are there views and links to the historic centres and does the land have an impact on the special character of the town?
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	This has been 'screened out' as this could be applied equally to all land in the Green Belt.

#### Table 4.1Broad Assessment Criteria



4.2.8 Previous studies have often struggled with the definition of sprawl and encroachment, and the differences between these. The dictionary definitions of sprawl and encroachment, as set out below are helpful in this respect:

Sprawl is defined as "....the straggling expansion of an urban or industrial area, irregular or straggling form, spread out over a large area in an untidy or irregular way".

Encroachment is defined as "intrude, advance gradually beyond an acceptable or established limit".

- 4.2.9 It is therefore considered reasonable in assessing existing Green Belt boundaries to use the criteria set out in Table 4.1 as being supported by these definitions. When revising Green Belt boundaries, PPG2 sets out that boundaries should be clearly defined using readily recognisable features where possible. These would then prevent sprawl and encroachment.
- 4.2.10 Consideration was also given to the following factors:
  - existing land use;
  - proximity and relationship to the built-up area;
  - degree of enclosure/openness;
  - distance and visual connection to historic urban centres/key urban areas; and
  - relationship to the countryside.
- 4.2.11 The results of the assessment were recorded in a matrix and using a simple traffic light system as shown below.

Area makes a significant contribution to Green Belt purposes:

Area makes a contribution to Green Belt purposes:

Area makes a limited contribution to Green Belt purposes:

- 4.2.12 This individual assessment against each purpose was followed by an evaluation of the overall extent to which each segment fulfils Green Belt purposes, again through the traffic light system and accompanying written evaluation using professional judgment. As a consequence, in some cases there may be one overriding purpose which is deemed critical, or in others a combination of a range of purposes that may lead to the overall conclusion.
- 4.2.13 We have not weighted the purposes as some other studies have done, as a weighting approach is much more open to interpretation as to the source and scale of the weighting used. Weighting of Green Belt purposes arguably goes against the spirit of PPG2 which, whilst identifying the prevention of sprawl and



the need to keep land permanently open as the fundamental aim of Green Belt policy, does not actually prioritise the five purposes of Green Belts. However, in the case of the Gloucester/Cheltenham Green Belt, the primary purpose of designation in this location was to prevent Cheltenham and Gloucester merging and to preserve the open character of the land between the towns. The professional judgement element of our methodology allows for consideration of this primary purpose, and in many cases, through professional judgement, particularly where the segment is in a very narrow part of the gap between settlements, this is considered to be an overriding factor in the overall traffic light judgement.

- 4.2.14 None of the traffic lights mean that there is no contribution to Green Belt purposes, and those segments identified as green still usually make some contribution to Green Belt purposes. A green light does not indicate that a particular segment should be released from the Green Belt, but that it merits further consideration should development requirements and other evidence suggest that Green Belt releases are necessary, as an area that is of least importance in Green Belt terms.
- 4.2.15 Recommendations for Green Belt release are not made in this report, rather it identifies segments where the purposes of the Green Belt are weaker and boundaries for the long term might merit re-definition should the land be required now or in the longer term. Potential release of segments or parts of segments from the Green Belt would have to be considered in the context of a range of planning, landscape and sustainability issues, having been informed by the level of development that is required in the JCS area, not purely based on this assessment.
- 4.2.16 The detailed consideration of potentially revised boundaries is not undertaken as this is a task for a more detailed review, as undertaken for the Urban Extensions Boundary Definition Study. The likely scale of Green Belt releases and land take is needed before detailed boundaries can be considered. All of the segments have however been identified based on strong boundaries such as roads, railways, watercourses and hedge/tree-lines and therefore could be used as the starting point for considering boundaries once the level of development required is known.
- 4.2.17 It should be noted that this Green Belt assessment differs from the previous Urban Extensions Boundary Definition Study in that the previous study was working backwards from areas of search and from specific growth numbers to find parcels of land that fitted these parameters. It was prepared in the context of a regional strategy that had already set a policy direction for removal of land from the Green Belt and had identified areas of search. This Green Belt assessment is undertaken without this policy direction and therefore considers all areas of the Green Belt and has divided the Green Belt up into appropriate segments for assessment rather that focusing on development levels and how much development particular segments could accommodate. As a consequence some of the results may vary slightly.
- 4.2.18 Once the JCS authorities have completed the evidence base and know what level of development needs to be planned for on Green Belt sites then the impact of potential Green Belt releases would need to be considered further in terms of the implications for the integrity of the wider Green Belt, the impact on patterns of sustainable development and other environmental considerations.

## Mapping of Assessment Results

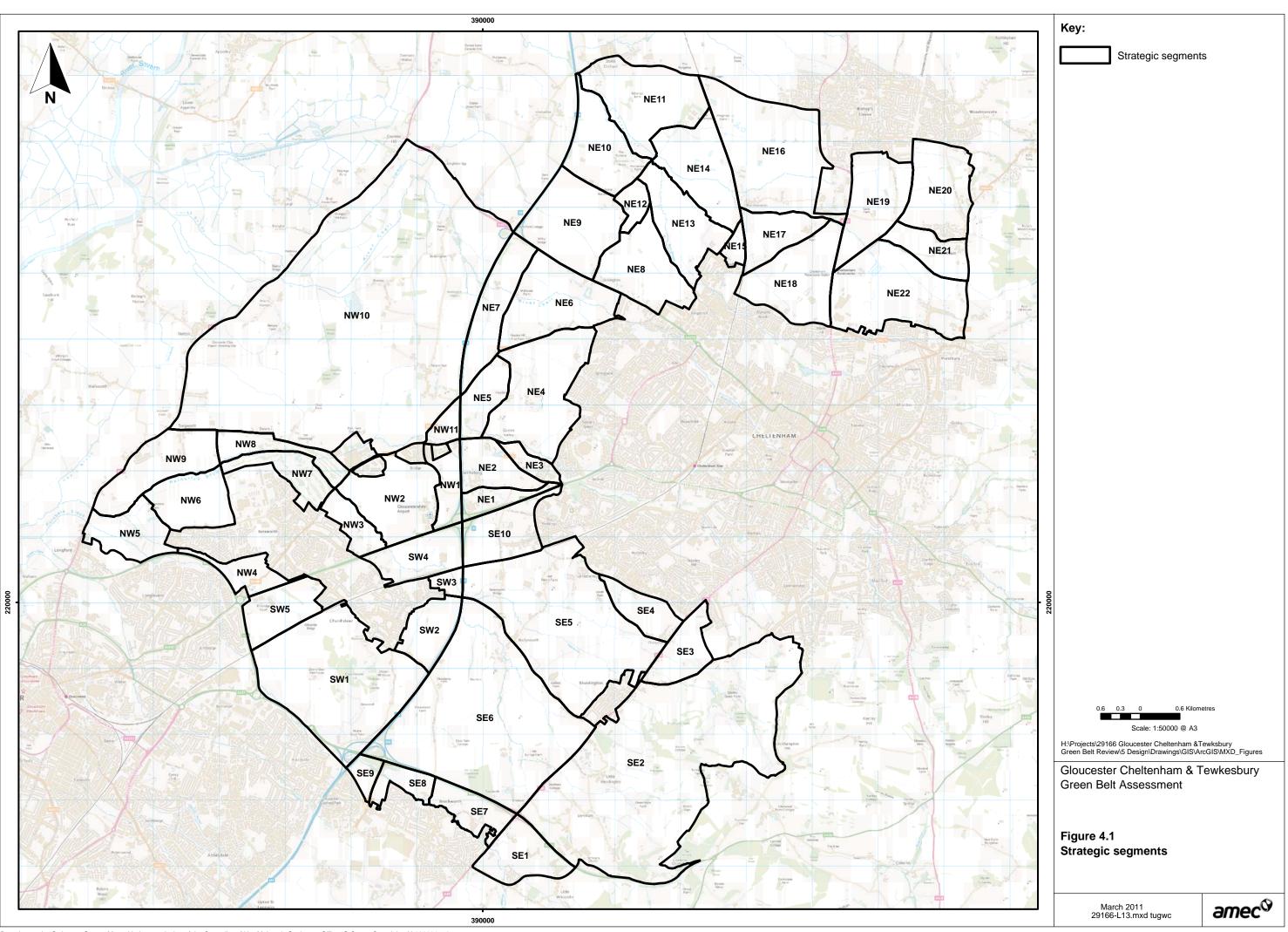
4.2.19 The traffic light results of the final assessment/evaluation were mapped and a summary table produced.



## Identification of Additions to the Green Belt

4.2.20 As required in the study brief, broad areas in the JCS area that are not currently located in the Green Belt were identified in order to consider which of these might usefully be added to the Green Belt to reinforce the existing Green Belt segments. All except one of these areas are physically linked to the existing area of Green Belt. These areas were also assessed against the five purposes of including land in Green Belts, as they will need to make a contribution to Green Belt purposes if they are to be considered for inclusion. Importantly they will need to meet the main purpose of designation of the Gloucester/Cheltenham Green Belt, to maintain the separation between Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, as this is still the key purpose of the Green Belt in this location. PPG2 does not set out any specific guidance on additions to existing Green Belts and does not make any reference to adding 'compensatory' Green Belt. There is therefore little policy guidance to suggest that new areas of Green Belt should be considered. With regard to new Green Belts, PPG2 advises that local authorities will need to demonstrate why normal planning and development control policies would not be adequate. This is retained in the Draft National Planning Policy Framework (DCLG, July 2011).





Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office. © Crown Copyright. AL100001776



## 5. Assessment Results

## 5.1 Introduction

5.1.1 This section of the report sets out the results of the assessment.

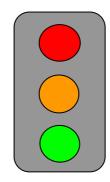
## 5.2 Green Belt Assessment Results

- 5.2.1 As set out in chapter 5, strategic segments were identified using mapping, aerial photographs and site visits to identify significant boundaries for segments of broadly similar character. Strong boundaries such as roads, railways, watercourses and hedge/tree-lines have been used where possible. The segments identified through this methodology are shown in Figure 4.1. Figure 5.1 shows the extent of the Green Belt in the JCS Area along with key constraints, including areas at risk of flooding, the Cotswold Area of Outstanding Natural Beauty (AONB) and nature conservation sites. This shows the wider context within which the assessment is being undertaken.
- 5.2.2 The main part of the appraisal considers the relative extent to which the different segments fulfil the purposes of Green Belts as set out in PPG2 (paragraph 1.5), although as set out in the methodology, the purpose relating to urban regeneration has been screened out for all segments as it could apply equally to all sites. The results are assessed through written evaluation and a traffic light system as set out below.

Area makes a significant contribution to Green Belt purposes:

Area makes a contribution to Green Belt purposes:

Area makes a limited contribution to Green Belt purposes:



5.2.3 Following identification of the traffic light for how each strategic segment fulfils each of the Green Belt purposes (excluding the urban regeneration purpose which has been screened out), an overall evaluation of the segment is provided along with an overall traffic light for the particular segment. Therefore segments can have a different traffic light in relation to each Green Belt purpose, but the overall traffic light for the segment against the five purposes. The matrix that set out the detailed results of this assessment can be found in Appendix D of this report. Figure 5.2 maps these results so that the geographical distribution of the results can more easily be seen.



## **Overview of Key Results**

5.2.4 In order to help organise the analysis of the contribution of the strategic segments, these have been grouped into 11 clusters. Seven of these clusters comprise the bulk of the Green Belt and are judged to make a Significant Contribution to Green Belt purposes, whilst one of the clusters make a Contribution and three make a Limited Contribution. These are shown in Table 5.1.

Table 5.1 Segment Clusters and their Contribution to the Green Belt Purpos
--

	Significant Contribution	Contribution	Limited Contribution
Segment clusters	<ul> <li>Land between Bishop's Cleeve and Cheltenham (segments NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22)</li> <li>Land between Cheltenham &amp; Gloucester to the east of the M5 north of the A40 (segments NE1, NE2, NE3, NE4, NE5, NE6, NE7)</li> <li>Land between Cheltenham and Gloucester to the east of the M5 south of the A40 (segments SE2, SE3, SE4, SE5, SE6, SE10)</li> <li>Land between Gloucester and around Churchdown to the west of the M5 south of the A40 (segments SW1, SW2, SW3, SW4, SW5, NW4)</li> <li>Land to the west of the M5, north of the A40, and north and north-east of Churchdown (segments NW1, NW2, NW3)</li> <li>Land to the north of Innsworth (segments NW7, NW8)</li> <li>Land to the west of the M5 and north of the B4063 (segments NW10, NW11)</li> </ul>	Land to the north-west of Cheltenham (segments NE9, NE10, NE11, NE12)	<ul> <li>Land to the north, west and east of Brockworth (segments SE7, SE8, SE9, SE1)</li> <li>Land to the west of Innsworth, north of Longford and around Twigworth (segments NW5, NW6, NW9)</li> <li>Land to the west of Kingsditch and Swindon (segments NE8, NE13)</li> </ul>

5.2.5 The contribution that the segment clusters make to the Green Belt purposes is set out below.

## Land Making a Significant Contribution to Green Belt Purposes

5.2.6 This land comprises the bulk of the Gloucester/Cheltenham Green Belt, and for the most part very clearly contributes to Green Belt purposes in relation to the Green Belt criteria. The strategic segments which make up this land have well defined external boundaries (principally being roads and watercourses) and as such have a clear identity and role in preventing encroachment into the countryside. The contribution of these segments to the prevention of the merging of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, the main purpose of designation of this Green Belt is very clear, as is their role in prevention of sprawl. There are however some parts of this area where there is some significant development associated with historic uses, notably at and around Gloucestershire Airport, Cheltenham



Racecourse and a series of areas that are excluded from the Green Belt between Churchdown and Cheltenham which, along with the M5, compromises a sense of openness and creates a more urbanised feel in this narrow corridor. This emphasises the need to maintain the gap in this area, particularly around the airport and racecourse where the gap between settlements is already very narrow. A sense of open countryside is soon achieved to the north and south of the narrow gap around Gloucestershire Airport, and overall, from viewpoints such as Leckhampton Hill and Churchdown Hill, the land readily gives the impression of open countryside.

- 5.2.7 Segment SE3, lying immediately to the south-west of Leckhampton has well-defined external boundaries in the A46 to the west and Leckhampton Lane to the south, and a strong landscape structure comprising pasture and remnant orchards separated by well-maintained hedgerows which gives it a strong coherence. However, despite the bulk of the segment fulfilling Green Belt purposes, particularly in limiting ribbon development along the A46 between Warden Hill and Shurdington, the boundary of the segment with land at Leckhampton appears to be illogical, particularly given recent developments at Brizen Lane/The Lanes which intrude into the parcel. The segment would most logically be defined by Farm Lane. However, the current eastern boundary of the Green Belt follows a ditch and hedgerow feature and then skirts the immediate boundary of the Brizen Lane/The Lanes development. A strong eastern boundary, such as Farm Lane, would help to complete the definition of the segment, albeit with detailed consideration of the precise boundary line in the vicinity of Brizen Farm. In turn, the contribution of the segment to Green Belt purposes would be strengthened and should be maintained given the importance of the gap between Cheltenham and Shurdington.
- 5.2.8 Overall, the weakest contribution of this land is to providing the setting to historic towns. Whilst the historic cores of both Cheltenham and Gloucester are largely masked by peripheral development, there are nevertheless long distance views to Gloucester Cathedral from significant parts of this land in its southern reaches, and particularly from Leckhampton Hill.

## Land Making a Contribution to Green Belt Purposes

#### Land north-west of Cheltenham (Segments NE9, NE10, NE11, NE12)

5.2.9 This land, forming the outer extent of the Green Belt is bounded to the west by the M5 motorway, the A4019 Tewkesbury Road to the south, the Bristol-Birmingham mainline railway to the east, and Stoke Road to the north. The landform is broadly level or gently undulating, with a gentle fall between 42m AOD in the east to approximately 22m AOD in the west close to the M5/A4019 Tewkesbury Road junction. Topography to the south-west of Elmstone Hardwicke is the least varied, creating the feeling of an open agricultural landscape. Variation increases only a little to the north and west of Elmstone Hardwicke. Land use is predominantly arable agriculture, a number of farms with associated ancillary buildings being scattered throughout the land. Fields are often large, although smaller particularly where closer to settlements. Field boundaries are marked by a network of hedgerows mostly in good condition, although gappy in places. This land plays a role in checking sprawl along the A4019 corridor through Uckington (the principal route to the M5 Junction 10), and while this function is clear, other Green Belt functions are much less obvious. This land plays only a limited role in maintaining separation between the settlements, the main purpose of the original designation. There are some urbanising uses where there has been encroachment around Mill Lane and Stoke Road at Stoke Orchard, but the majority of the area



has a relatively open feel. This area has a limited role in preserving the setting and special character of the historic towns as it is too remote to act as a setting.

### Land Making a Limited Contribution to Green Belt Purposes

5.2.10 A number of segments were identified as making a limited contribution to Green Belt purposes. This does not mean that they have no contribution to make or that the whole of the segment is of equal status; rather that <u>as a whole</u> the segment makes a limited contribution comparative to other segments.

# Land to the west of Innsworth, north of Longford and around Twigworth (Segments NW5, NW6, NW9)

5.2.11 The land is relatively flat, with the higher ground at approximately 12-18m AOD. Current land use is predominantly agricultural, with a number of fields used as pasture, separated by well maintained native hedges and occasional hedgerow trees offering varying degrees of enclosure. Around Dry Meadow Lane to the south of the area there is a sewage treatment works and a former landfill site. The A38 boundary is punctuated by a number of existing dispersed residential areas. There have been various intrusions into this area of the Green Belt through urban development in the vicinity of Innsworth and around Twigworth village along the A38. There is still an open feel and connection with the wider countryside of the Vale of Gloucester to the west and to a much lesser extent to the north towards Twigworth. However, this area plays a very limited role in preventing Gloucester and Cheltenham from merging and it has strong boundaries to prevent any further encroachment formed by the Hatherley Brook and further out by the A38/Hatherley Lane and Frogfurlong Lane. These factors, combined with the urbanising influences in the area result in the land making a limited contribution to the Green Belt purposes. This area has a limited role in preserving the setting and special character of historic towns. Further consideration of this area for release from the Green Belt is therefore warranted should other elements of the evidence base suggest a need to release Green Belt sites.

#### Land to the north, west and east of Brockworth (Segments SE1, SE7, SE8, SE9)

5.2.12 The segments to the north and west of Brockworth have become strongly enclosed through urban development to the south in Brockworth (the edge of which is principally defined by Horsbere Brook), and the A417 to the north and other road developments in the case of segment SE9. The landform is gently undulating, falling from around 70m AOD in the east to approximately 40m AOD where it abuts the M5 Motorway. Land use is predominantly arable agriculture with moderately sized fields with reasonably strong hedgerow boundaries, creating a sense of openness in some areas, although to the west there is significant road infrastructure which has an urbanising feel. To the east there are a number of urbanising uses including the Sports Centre, Brockworth Enterprise School and the recently built housing at Mill Lane. The land has a limited role in relation to sprawl as demonstrated by the development around Mill Lane. The land forms a distinct parcel from the principal extent of Green Belt land separating Gloucester and Cheltenham. These segments have a limited role in preserving the setting and special character of historic towns as they form the northern edge to Gloucester, but are not key to its setting and they are separated from Gloucester by the M5. However, there is a visual connection between SE7 and SE8 and the Green Belt because of the A417 being in a cutting. The relatively recent construction of Valiant Way to provide access from Junction 11A of the M5 to Gloucester Business Park



has further subdivided this land (SE9), creating a sense of enclosure and detachment from adjacent segments and the wider Green Belt to the north.

- 5.2.13 Segment SE1 forms the transition between the urban edge of Gloucester and the Cotswold escarpment. The land is principally in agricultural use, rising from approximately 60m AOD in the west to 85m AOD in the east, with highly variable field size and field boundary structure. Intrusion by built development (notably to the east of the A46 Shurdington Road) compromises the sense of openness, this being compounded by a number of extensive agricultural buildings (Middle Pig Farm and Court Farm). This segment appears to be detached from the principal extent of the Green Belt to the north of the A417 and makes little contribution to the separation of Gloucester and Cheltenham or to preserving the setting and special character of Gloucester. Although segment SE1 makes a limited contribution to the Green Belt purposes, should Green Belt sites be needed to meet development requirements, the decision as to whether or not this site is suitable for development may be influenced by its location in the AONB, and other sustainable development considerations.
- 5.2.14 Whilst a limited contribution to Green Belt function remains, being both part of the land separating Gloucester and Cheltenham and preventing the further encroachment of Brockworth into what is still open countryside, these segments have to varying degrees become compromised by major road infrastructure, intrusive development, physical enclosure and functional separation from the main body of the Green Belt to the north. If, after considering other elements of the evidence base, this is to be considered for potential release, detailed appraisal of the form and function of this land and the potential consequences of release from the Green Belt is warranted particularly as it is contained by strong boundaries that will prevent encroachment and sprawl.

#### Land to the west of Kingsditch and Swindon (Segments NE8, NE13)

- 5.2.15 These segments are of varying topography and land use, and although dominated by extensive arable agriculture, they are also characterised by ribbon development along the A4019. This consists of residential plots and a number of plant nurseries in the case of segment NE8, and rough pasture in the case of segment NE13 associated with the River Swilgate. The land performs a limited role in the separation of either Cheltenham and Gloucester or Cheltenham and Bishop's Cleeve, this being the function of segments to the south-west and east of this land. The land makes a limited contribution to preserving the setting and special character of historic towns as the visual connection with Cheltenham is limited.
- 5.2.16 Whilst this area of land is clearly part of the Green Belt as defined around Cheltenham in a broad sense, potential opportunities for boundary revision exist towards the south-east (principally segment NE8) without compromising its wider function. The absence of obvious strong boundaries within segment NE8 and N13 is problematic in respect of ready subdivision, although this is not insurmountable with careful masterplanning, in turn contributing to the containment of the pressures for expansion of the Kingsditch Trading Estate, which is currently characterised by an ill-defined boundary with the wider countryside to the north-west. If after considering other elements of the evidence base, this area is to be considered further for potential release from the Green Belt, strong long term boundaries would need to be created as part of any new development.



## 5.3 **Recommendations**

- 5.3.1 The results of this assessment (summarised above and set out in full in Appendix D) identify areas which merit further investigation for possible boundary review in the short and longer term depending on development requirements in the JCS area. Other policies, for example those relating to open countryside may also have to be used if any revisions are proposed to the Green Belt.
- 5.3.2 Table 5.2 summarises the evaluation for each of the segment clusters along with recommendations for the JCS authorities. The recommendations set out below need to be considered in the context of the rest of the evidence base, and should not be viewed in isolation.

#### Table 5.2 Evaluation and Recommendations of Clusters

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
Land Between Bishop's Cleeve & Cheltenham	NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Significant Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: in particular the segments adjoining the urban areas of Cheltenham and Bishop's Cleeve make a significant contribution towards preventing sprawl in various locations where there is already some evidence of ribbon development.</li> <li>Prevent merger: these segments make a significant contribution towards the separation of Cheltenham and Bishop's Cleeve.</li> <li>Safeguard countryside from encroachment: although there are significant urbanised areas associated with Cheltenham racecourse and associated development, much of the land is open. There are no strong boundaries to contain development.</li> <li>Preserve the setting of towns: the majority of the segments form part of the wider setting for Cheltenham and the racecourse.</li> <li>Other Factors:</li> <li>Existing land use: predominantly mixed arable/pasture with strong field boundaries.</li> <li>Proximity and relationship to the built-up area: strong connections with both Cheltenham and Bishop's Cleeve.</li> <li>Degree of enclosure/openness: strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside. However, significant urbanised intrusions associated with Cheltenham racecourse and immediate environs compromise this openness towards the east of the belt.</li> <li>Distance and visual connection to historic urban centres/key urban areas: sets the context for Cheltenham and the racecourse, in particular.</li> <li>Relationship to the countryside: forms a critical connection between wider countryside to the east and west.</li> </ul>



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			RECOMMENDATION: maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981) and these segments play an important role in this. Therefore this area does not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.
Land to the north-west of Cheltenham	NE9, NE10, NE11, NE12	Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: these areas play a role in limiting sprawl and preventing further ribbon development along the A4019 and M5.</li> <li>Prevent merger: limited role in this.</li> <li>Safeguard countryside from encroachment: predominantly open agricultural land although there are a number of buildings throughout the area. There are no strong boundaries to contain development longer term.</li> <li>Preserve the setting of towns: limited role in this as most of the land is too remote.</li> <li>Other Factors:</li> <li>Existing land use: predominantly mixed arable/pasture with strong field boundaries.</li> <li>Proximity and relationship to the built-up area: limited overall, but forms part of Cheltenham's north-western boundary.</li> <li>Degree of enclosure/openness: strong field boundaries with extensive views across the segment and towards the Cotswold scarp to the east, in particular.</li> <li>Distance and visual connection to historic urban centres/key urban areas: whilst adjacent to Cheltenham's north-west boundary, performs a limited function as context for the urban area.</li> <li>Relationship to the countryside: performs a role of connecting the urban fringe of Cheltenham with the wider countryside, but open countryside only really becomes apparent beyond Uckington.</li> <li>RECOMMENDATION: Overall, these segments make a contribution to Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</li> </ul>
Land to the west of Kingsditch and Swindon	NE8, NE13	Limited Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: significant ribbon development along the A4019. This area makes a limited contribution to preventing sprawl.</li> <li>Preventing merger: limited contribution as it is the land to the east and southwest that have a greater role in separation.</li> <li>Safeguard countryside from encroachment: part of this area does make a contribution to preventing encroachment, although creating stronger boundaries would contain the development.</li> <li>Preserve the setting of towns: limited contribution as there is limited visual</li> </ul>



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			connection with Cheltenham.
			<ul> <li>Other Factors</li> <li>Existing land use: predominantly mixed arable/pasture with strong field boundaries.</li> </ul>
			• <b>Proximity and relationship to the built-up area:</b> limited overall, but forms part of Cheltenham's north-western boundary.
			<ul> <li>Degree of enclosure/openness: limited field boundaries with some extensive views, particularly from the outer extent of the segments.</li> </ul>
			<ul> <li>Distance and visual connection to historic urban centres/key urban areas: whilst adjacent to Cheltenham's north-west boundary, performs a limited function as context for the urban area.</li> </ul>
			<ul> <li>Relationship to the countryside: performs a role of connecting the urban fringe of Cheltenham with the wider countryside, but open countryside only really becomes apparent beyond Uckington.</li> </ul>
			RECOMMENDATION: whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion and compromises its overall Green Belt function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt and therefore merit further consideration for possible release should other elements of the evidence base suggest that it may be appropriate.
Land between Cheltenham & Gloucester to the east of the M5	SE2, SE3, SE4, SE5, SE6, SE10	Significant Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: certain segments make a significant contribution to preventing sprawl, particularly in limiting ribbon development along the A46 and A40, although there is already ribbon development in a number of locations.</li> <li>Preventing merger: significant contribution to preventing merger of Leckhampton and Shurdington, thus separating Cheltenham and Gloucester and preventing merging along the A40 at the narrowest part of the Green</li> </ul>
			<ul> <li>Belt.</li> <li>Safeguard countryside from encroachment: significant contribution as there are few strong long term defensible boundaries, and in particular the north-eastern boundary at Leckhampton is weak. There is still an open feel despite the encroachment that has taken place.</li> </ul>
			<ul> <li>Preserve the setting of towns: maintains the setting for Cheltenham and plays a role in maintaining the special character including views from Leckhampton Hill and environs.</li> </ul>
			Other Factors:
			<ul> <li>Existing land use: predominantly mixed arable/pasture with strong field boundaries.</li> </ul>
			• <b>Proximity and relationship to the built-up area:</b> adjacent to Cheltenham to the north, separated from Gloucester to the South by the strong boundary of



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			the A417.
			<ul> <li>Degree of enclosure/openness: strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside.</li> </ul>
			• Distance and visual connection to historic urban centres/key urban areas: varying views given enclosure, but sets the context for Cheltenham, particularly as viewed from the Cotswold scarp to the east.
			• <b>Relationship to the countryside:</b> forms a critical connection between wider countryside to the east and west.
			RECOMMENDATION: critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Critical to preventing ribbon development along the A40 and A46. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary. These segments do not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.
Land between	SW1, SW2,	Significant	Evaluation against Purposes:
Gloucester and Churchdown to the west of the	SW3, SW4, SW5, NW4	Contribution	• <b>Check unrestricted sprawl:</b> performs key role in preventing sprawl from Churchdown and is critical to preventing separation along the A40 corridor.
M5			• <b>Prevent merger:</b> significant contribution to this in an area where the gap is at its narrowest.
			• Safeguard the countryside from encroachment: there are few strong long term boundaries which would not result in the merging of Churchdown and Gloucester.
			• <b>Preserve the setting of towns:</b> provides the setting from North Gloucester.
			Other factors:
			<ul> <li>Existing land use: predominantly mixed arable/pasture with strong field boundaries.</li> </ul>
			• <b>Proximity and relationship to the built-up area:</b> adjacent to Churchdown and the northern edge of Gloucester, effectively containing their spread into open countryside and particularly the narrow gap between Churchdown and Cheltenham
			• <b>Degree of enclosure/openness:</b> strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside when viewed from the M5 in particular. Churchdown Hill forms a particularly strong focal point for views within this and remoter tracts of Green Belt land.
		<ul> <li>Distance and visual connection to historic urban centres/key urban areas: Churchdown Hill in particular is a focal point for views from, and into, Gloucester.</li> </ul>	
			• <b>Relationship to the countryside:</b> part of the wider belt of land separating Cheltenham and Gloucester.
			<b>RECOMMENDATION: critical to the separation of Cheltenham and</b>
			Gloucester, being the original purpose of designation. These segments do



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			not merit further consideration for release from the Green Belt at this stage
			unless other elements of the evidence base strongly suggest otherwise.
Land to the north, west and east of Brockworth	SE1, SE7, SE8, SE9	Limited Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: limited contribution as there has already been ribbon development/sprawl in this area.</li> <li>Browent mergerst limited contribution. Although it is part of the land.</li> </ul>
			<ul> <li>Prevent merger: limited contribution. Although it is part of the land separating the settlements, it is limited due to severance by the strong boundary of the A417.</li> </ul>
			• Safeguard the countryside from encroachment: limited contribution in preventing northward spread of Brockworth as there is development around Mill Lane, the Leisure Centre and school. Clear strong long term boundary formed by A417 which would contain development.
			Preserve the setting of towns: limited contribution given distance from Gloucester.
			Other Factors:
			• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.
			• <b>Proximity and relationship to the built-up area:</b> forms the urban fringe to Gloucester.
			Degree of enclosure/openness: of open character but built development has intruded and to the west road infrastructure dominates.
			• Distance and visual connection to historic urban centres/key urban areas: limited visual connection with Gloucester.
			• <b>Relationship to the countryside:</b> visual connection with open countryside to the north across the A417, the latter being in a cutting. Limited functional relationship, however.
			<u>RECOMMENDATION: whilst forming the immediate boundary to</u> <u>Gloucester, intrusion of urban uses compromises its sense of</u> <u>openness. Severance from the main Green Belt tract to the north by</u> <u>the A417 further limits its function, meaning that there could be</u> <u>opportunities for re-examining its designation and boundaries. There</u> <u>would be no risk of sprawl or encroachment due to the strength of the</u> <u>A417 as a boundary. The segments enclosure on all sides by major</u> <u>roads results in them serving little or no Green Belt function. There is</u> <u>therefore in considering these segments for possible release should</u> <u>other elements of the evidence base suggest that it may be appropriate.</u>
Land between Cheltenham	NE1, NE2, NE3,	Significant Contribution	Evaluation against Purposes:
Cheltenham and the M5 north of the A40	NE4, NE5, NE6, NE7	•	• <b>Check unrestricted sprawl:</b> significant contribution as western boundary prevents sprawl from Gloucester and the segments prevent ribbon development along the A40 and A4019, although some areas are already urbanised.
			• <b>Prevent merger:</b> significant contribution as this is a narrow part of the gap between Cheltenham and Innsworth/Churchdown.
			Safeguard the countryside from encroachment: few long term strong boundary options that would prevent encroachment and would not result in



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			the merger of Gloucester and Cheltenham at this narrow point in the Green Belt.
			• Preserve the setting of towns: provides countryside setting to Cheltenham.
			Other Factors:
			• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.
			• <b>Proximity and relationship to the built-up area:</b> forms the western envelope of Cheltenham.
			• <b>Degree of enclosure/openness:</b> variable, particularly towards the urban fringe, but generally open to extensive views across through the tract and to the north and south.
			Distance and visual connection to historic urban centres/key urban areas: provides the setting for Cheltenham.
			• <b>Relationship to the countryside:</b> forms a direct connection between the urban fringe and open countryside to the west beyond the M5.
			<b>RECOMMENDATION:</b> critical to preventing the sprawl of Cheltenham and towards the south the merger of Cheltenham and Churchdown. Therefore
			this area does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.
Land to the	NW1, NW2,	Significant	Evaluation against Purposes:
west of the M5, north of the A40, and north and southwest	NW3	Contribution	• <b>Check unrestricted sprawl:</b> significant contribution in containing airport and employment related sprawl and eastward sprawl of Churchdown along the A40.
of Churchdown			• <b>Prevent merger:</b> significant contribution which is particularly key at this narrowest part of the gap.
			• Safeguard countryside from encroachment: contribution, although there are a number of urbanising influences associated with the airport and employment uses. There are few strong boundaries to prevent development in the longer term.
			• <b>Preserve the setting of towns:</b> some contribution although some distance from centre of Gloucester and Cheltenham.
			Other Factors:
			• <b>Existing land use:</b> dominated by Gloucestershire Airport and associated uses, including large industrial estates on land excluded from the Green Belt. Remnant parcels of pasture (NW1) and arable land (NW3).
			• <b>Proximity and relationship to the built-up area:</b> forms the north-western boundary of Churchdown with ready access via the B4063.
			• <b>Degree of enclosure/openness:</b> flat land with variable degrees of openness, particularly in the vicinity of Gloucester Airport where the paraphernalia associated with the Airport, and large commercial sites which have been excluded from the Green Belt, can interrupt extensive views towards the Cotswold scarp to the east and wider countryside to the west.
			Distance and visual connection to historic urban centres/key urban



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			areas: none.
			• <b>Relationship to the countryside:</b> part of the transition to the wider countryside of the Vale of Gloucester to the north and west.
			RECOMMENDATION: land which is critical to preventing the closing of the gaps between Cheltenham and Churchdown (being already heavily intruded in developments associated with Gloucestershire Airport, and Gloucester and Churchdown) and preventing merger along the A40. Therefore this land does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.
Land to the	NW7, NW8	Significant	Evaluation against Purposes:
north of Innsworth		Contribution	Check unrestricted sprawl: prevents sprawl from Innsworth and employment uses and ribbon development along the B4063.
			<ul> <li>Prevent merger: significant contribution as it prevents Cheltenham and Innsworth/Churchdown from merging.</li> </ul>
			• Safeguard countryside from encroachment: prevents encroachment of Innsworth/employment areas in this narrow part of the gap between Cheltenham and Gloucester. Although there are strong boundaries, NW8 is divorced from the urban edge.
			<ul> <li>Preserve the setting of towns: some contribution, providing the setting for Innsworth/Churchdown, but distant from Cheltenham and Gloucester's historic centres.</li> </ul>
			Other Factors:
			• <b>Existing land use:</b> dominated by the Brockhampton Court Golf Complex, retaining a predominantly rural aspect.
			• <b>Proximity and relationship to the built-up area:</b> limited but forms the northern boundary of Innsworth.
			• <b>Degree of enclosure/openness:</b> variable, openness often limited by extensive tree planting associated with the golf course.
			<ul> <li>Distance and visual connection to historic urban centres/key urban areas: none.</li> </ul>
			• <b>Relationship to the countryside:</b> part of the transition to the wider countryside of the Vale of Gloucester to the north and west.
			<u>RECOMMENDATION: critical to preventing the closing of the gap between</u> <u>Cheltenham and Churchdown, particularly towards the east of these</u> <u>segments. Critical to prevention of sprawl through ribbon development.</u> <u>Therefore this land does not merit further consideration for potential</u> <u>release from the Green Belt at this stage unless other elements of the</u> <u>evidence base strongly suggest otherwise.</u>
Land to the west of the M5 and north of the B4063	NW10, NW11	Significant Contribution	<ul> <li>Evaluation against Purposes:</li> <li>Check unrestricted sprawl: significant contribution in preventing sprawl from smaller settlements and employment areas and in preventing ribbon development along the A38, B4063 and B4634.</li> </ul>



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			• <b>Prevent merger:</b> southern part of area in particular makes a significant contribution to maintaining separation between Cheltenham and Gloucester (Churchdown).
			• Safeguard countryside from encroachment: existing boundaries are weak in particular to the south, with no strong boundaries to contain encroachment longer term.
			• Preserve the setting of towns: limited contribution due to remoteness from historic centres of Gloucester and Cheltenham.
			Other Factors:
			• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries and a great diversity of field sizes and shapes.
			• <b>Proximity and relationship to the built-up area:</b> limited, forming the wider north-western extent of the Green Belt.
			<ul> <li>Degree of enclosure/openness: predominantly open, although locally variable where field boundaries are stronger, woodland patches are present or the land is settled (such as Staverton).</li> </ul>
			Distance and visual connection to historic urban centres/key urban areas: none.
			• <b>Relationship to the countryside:</b> an intrinsic part of the wider Vale of Gloucester to the west of this land.
			<ul> <li><u>RECOMMENDATION</u>: forms the bulk of the extent of the Green Belt in this north western quarter, with separation function stronger towards the south and eastern extent of these segments. There are currently weak boundaries with no obvious boundaries to prevent longer term encroachment. The segments prevent merger through ribbon development along the A38, B4063 and B4634. Therefore this does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</li> </ul>
Land to the	NW5, NW6,	Limited	Evaluation against Purposes:
west of Innsworth, north of Longford and	NW9	Contribution	Check unrestricted sprawl: limited contribution in preventing sprawl/ribbon development between Twigworth and Longford.
around Twigworth			• <b>Prevent merger:</b> limited contribution as development here would not bring Cheltenham and Gloucester closer together.
			• Safeguard countryside from encroachment: limited contribution as there have already been some intrusions at Twigworth, and there are opportunities to create stronger long-term boundaries.
			• Preserve the setting of towns: limited contribution as no real connection with Gloucester.
			Other Factors:
			• <b>Existing land use:</b> predominantly mixed arable/pasture with reasonably strong field boundaries.
			• <b>Proximity and relationship to the built-up area:</b> southern part forms the western boundary to Innsworth.



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<ul> <li>Degree of enclosure/openness: predominantly open with extensive views across to adjacent tracts and distant focal points (principally Churchdown Hill).</li> </ul>
			• Distance and visual connection to historic urban centres/key urban areas: forms the context for Gloucester as approached from the north along the A38.
			Relationship to the countryside: forms the transition to the wider countryside of the Vale of Gloucester.
			RECOMMENDATION: the openness of this tract is compromised by intrusive development. Combined with a very limited function in preventing the merger of towns, should other elements of the evidence base suggest it is appropriate, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries and there are strong boundary options.

## 5.4 Assessment of Potential Additions to Green Belt

- 5.4.1 The study brief also identified the need for the assessment to include potential areas for addition to the Green Belt. As part of the assessment process, a number of areas which could merit further study for potential additions to the Green Belt have been identified. These broad areas are shown in Figure 5.3. The areas to the south (south of Leckhampton) and east of Cheltenham were selected on the basis that they were the key areas adjoining the urban area that were not currently designated as Green Belt. The area to the west of the M5 around Hardwicke was selected on the basis that land to the east and southwest was included in the Green Belt.
- 5.4.2 The land to the north of Bishop's Cleeve was included on the basis that land to the south of Bishop's Cleeve is included in the Green Belt and this area was proposed as an extension to the Green Belt in the Draft RSS for the South West, although the Panel later recommended that additions to the Green Belt were not appropriate in light of PPG2 and the original purpose of designation. The land along the western edge of Gloucester was an area that was suggested for possible inclusion in the Green Belt through the previous Joint Study Area (JSA) work, the reason being that it may assist in safeguarding the historic setting of central Gloucester. Land to the south-east of Gloucester, around Robins Wood Hill, was also identified in the JSA work as a possible addition to the Green Belt. The southern part of Tewkesbury Borough, south-east of Brockworth (east of the A46, south of the A417) is also included for consideration. These areas are all within the JCS area. Land in neighbouring authorities has not been considered as it is not part of the remit of this study.
- 5.4.3 PPG2 does not make any reference to increasing the Green Belt area solely to compensate for other areas that may be removed from the Green Belt for development and therefore any areas to be included in the Green Belt should make a contribution to the purposes of including land in the Green Belt, and



importantly they should play a role in the key purpose of designation of the Green Belt in this location, maintaining the separation between Gloucester and Cheltenham and between Cheltenham and Bishop's Cleeve. The assessment of potential new areas of Green Belt is the same as the assessment of possible releases from the Green Belt, and as with the other segments, the fifth Green Belt purpose of assisting in urban regeneration by encouraging the recycling of derelict and other urban land has been screened out as it could equally apply to all areas. There are few examples to draw on from other authorities where significant areas of Green Belt have been added.

5.4.4 Table 5.3 describes the areas considered in more detail and sets out the results of an evaluation of these areas against the five purposes of including land in Green Belts. Based on this evaluation the table also sets out recommendations as to whether or not the particular area should be considered further by the JCS authorities as potential additions to the Green Belt. As with the recommendations relating to areas for possible release from the Green Belt, these areas should not be considered in isolation and need to be considered in the context of the rest of the Core Strategy evidence base.

Area and rationale for consideration	Evaluation	Recommendation
<ul> <li>Land to the south-west of Leckhampton, south-west of Farm Lane</li> <li>To ensure robustness of the inner boundaries of Green Belt making a significant contribution to separation of Gloucester and Cheltenham.</li> <li>Existing land use: improved grazing.</li> <li>Proximity and relationship to the built-up area: immediately to the east of Brizen Lane.</li> <li>Degree of enclosure/openness: open with remnant hedgerows associated with a previously finer-grained field pattern.</li> <li>Distance and visual connection to historic urban centres/key urban areas: none</li> <li>Relationship to the countryside: adjacent to open countryside to the south and west.</li> </ul>	Check unrestricted sprawl - would help to form part of a more substantive barrier preventing the outward expansion of Leckhampton. Would prevent ribbon development on the western side of Farm Lane and around Brizen Lane. Prevent merger - would contribute to the separation of Leckhampton and Shurdington. Safeguard countryside from encroachment - stronger long term boundary at Farm Lane would prevent encroachment. Preserve the setting of towns - limited role.	A relatively strong case for inclusion given that this parcel effectively forms part of segment SE3, being of similar land use and open character. The existing inner boundary of the Green Belt is defined by a weak drainage ditch and hedge; Farm Lane, by contrast, is a well-defined and more logical boundary to this segment preventing ribbon development. The precise line of the boundary around Brizen Lane/The Lanes would require careful consideration.
<ul> <li>Land to the south-west of Leckhampton, east/north-east of Farm Lane (between Farm Lane, Kidnappers Lane and Church Road)</li> <li>To help maintain the openness of this piece of land, enclosed by the expansion of Leckhampton to the east and Warden Hill to the west.</li> <li><i>Existing land use:</i> rough and improved grazing and remnant orchards (in its southern portion bounded by Farm Lane, Kidnappers Lane and Church Road) and rough grazing, sports pitches/open space and nursery enterprises (one functioning, one redundant) in its northern portion (between Kidnappers Lane and the urban edge of</li> </ul>	Check unrestricted sprawl - could help to prevent the outward expansion of Leckhampton and ribbon development along Church Road and Kidnappers Lane, although already sprawl around Brizen Lane. Prevent merger - contribution, although limited due to the development around Brizen Lane which already brings Cheltenham closer to	The connectivity of this land with the wider countryside is relatively strong, particularly to the south-east across Church Road, and well defined by boundary roads. However, the development at Brizen Lane/The Lanes has intruded into open countryside. The area is effectively surrounded by Green Belt on three sides. Land to the north-east of Farm Lane does not merit consideration for inclusion given that it does not play a role in terms of maintaining the gap

#### Table 5.3 Evaluation and Recommendations for Areas Considered for Addition to the Green Belt



Area and rationale for consideration	Evaluation	Recommendation
<ul> <li>Leckhampton).</li> <li>Proximity and relationship to the built-up area: generally in close proximity to the urban edge of Leckhampton.</li> <li>Degree of enclosure/openness: openness limited by complex field structure and overgrown hedgerow boundaries. Land retains more of an agricultural function in its southern portion.</li> <li>Distance and visual connection to historic urban centres/key urban areas: no immediate connection.</li> <li>Relationship to the countryside: strong connectivity for the southerly portion (across Farm Lane and Church Road), but limited for the northern portion being enclosed by the A46 to the west, Kidnappers Lane to the south and urban development to the north and east.</li> </ul>	Shurdington. Safeguard countryside from encroachment - this area is already surrounded by development on three sides, and so plays a limited role in safeguarding the countryside. Farm Lane boundary option would be strong long term boundary. Preserve the setting of towns - no direct role.	between Gloucester and Cheltenham, the key Green Belt purpose in this location. Other planning policies could be used here as appropriate to control development.
<ul> <li>Land on the eastern fringe of Cheltenham, stretching from Leckhampton in the south to Woodmancote in the north</li> <li>Deflected pressure from development restraint around western Cheltenham.</li> <li><i>Existing land use:</i> various, although dominated by grazing.</li> <li><i>Proximity and relationship to the built-up area:</i> forms the eastern boundary to Cheltenham.</li> <li><i>Degree of enclosure/openness:</i> highly variable field size and degree of enclosure, determined by topography of the scarp slope.</li> <li><i>Distance and visual connection to historic urban centres/key urban areas:</i> important backdrop to Cheltenham, with views directly into the historic centre.</li> <li><i>Relationship to the countryside:</i> forms the open countryside to the east of Cheltenham.</li> </ul>	Check unrestricted sprawl - would assist in preventing ribbon development along the A435, A40, and B4632. Prevent merger - no direct role Safeguard countryside from encroachment - few strong boundaries to prevent longer term development. Preserve the setting of towns - would assist in maintaining open views into Cheltenham.	No clear case for inclusion, notwithstanding pressure for eastward expansion. Land plays no role in separation between Cheltenham and Gloucester, or Cheltenham and Bishop's Cleeve. Land is covered by AONB designation. No obvious inner or outer boundary exists (apart from the B4362 at Southam), making physical definition of the land very difficult. The control of encroachment into open countryside, for example, could be addressed through other planning policies.
<ul> <li>Land to the north of Bishop's Cleeve stretching in an arc from Stoke Road to the Honeybourne Railway Line</li> <li>Deflected pressure from development constraints around Cheltenham.</li> <li>Existing land use: grazing/arable.</li> <li>Proximity and relationship to the built-up area: forming the countryside fringe of Bishop's Cleeve.</li> <li>Degree of enclosure/openness: open, extensive landscape with distant views to the west, north and east.</li> <li>Distance and visual connection to historic urban centres/key urban areas: none.</li> <li>Relationship to the countryside: part of open countryside extending northwards to Gotherington and north-westwards towards Tewkesbury.</li> </ul>	Check unrestricted sprawl - possible role in limiting ribbon development along A435 and Gotherington Road. Prevent merger - no direct role. Safeguard countryside from encroachment - no strong boundary options to prevent longer term development. Preserve the setting of towns - no direct role.	No clear case for inclusion, given that the land performs no Green Belt role as defined by the original reasons for designation. There are no obvious strong boundaries to prevent longer term development. The control of encroachment into open countryside, for example, could be addressed through other planning policies.



Area and rationale for consideration	Evaluation	Recommendation
<ul> <li>Land to the west of the M5, north of the A4019, east of the A38</li> <li>Deflected development pressure centred on M5 Junction 10.</li> <li><i>Existing land use:</i> intensively farmed arable and grazing with significant variation in field patterns and strength of boundaries.</li> <li><i>Proximity and relationship to the built-up area:</i> none.</li> <li><i>Degree of enclosure/openness:</i> open landscape, defined by the M5 to the east, the A4019 to the south, the A38 to the west and Cursey Lane/Stoke Road to the north.</li> <li><i>Distance and visual connection to historic urban centres/key urban areas:</i> no visual connection.</li> <li><i>Relationship to the countryside:</i> part of the open countryside extending to Tewkesbury to the north.</li> </ul>	Check unrestricted sprawl - no direct role as it does not adjoin the urban area. Prevent merger - no direct role. Safeguard countryside from encroachment - limited strong long term boundary options. Preserve the setting of towns - no direct role.	Although there may be pressure for development which could be deflected over the M5 from restricted opportunities around Cheltenham, the land does not play any role in the separation of Cheltenham and Gloucester and therefore there is no case for inclusion.
<ul> <li>Land along the western edge of Gloucester</li> <li>To assist in safeguarding the historic centre of Gloucester</li> <li><i>Existing land use:</i> various including grazing/arable further north, industrial, floodplain.</li> <li><i>Proximity and relationship to the built-up area:</i> forms north western part of Gloucester and area between canal and River Severn.</li> <li><i>Degree of enclosure/openness:</i> variable field size and land uses.</li> <li><i>Distance and visual connection to historic urban centres/key urban areas:</i> part of area in relatively close proximity to historic centre of Gloucester.</li> <li><i>Relationship to the countryside:</i> varying with northern area forming part of open countryside.</li> </ul>	Check unrestricted sprawl - would assist in preventing westward expansion of Gloucester and ribbon development although much of area is at risk of flooding and therefore unlikely to be suitable for residential development. Prevent merger - no direct role. Safeguard countryside from encroachment - few strong long term boundary options to contain development, although much of area is floodplain. Preserve the setting of towns - would assist in maintaining open views into Gloucester.	No clear case for inclusion, given that the land performs only a limited Green Belt role as defined by the original reasons for designation. The control of encroachment into open countryside, for example, could be addressed through other planning policies. This area was suggested as a possible area for inclusion in the previous JSA work.
<ul> <li>Land to the south-east of Gloucester, around Robins Wood Hill</li> <li>To provide protection to the countryside character of the area</li> <li><i>Existing land use:</i> Country Park including golf course and leisure uses, and some arable.</li> <li><i>Proximity and relationship to the built-up area:</i> close proximity to built up area to north, east and west.</li> <li><i>Degree of enclosure/openness:</i> Country Park enclosed by surrounding built development, but open feel towards motorway to south-east.</li> <li><i>Distance and visual connection to historic urban centres/key urban areas:</i> some visual connection.</li> <li><i>Relationship to the countryside:</i> varying with south-</li> </ul>	Check unrestricted sprawl - limited role in preventing ribbon development and northern part of area is protected as Country Park. Prevent merger - no direct role. Safeguard countryside from encroachment - much of land is surrounded by development on three sides. M5 would provide long term boundary to south- east. Preserve the setting of towns - would assist in preserving the setting of this part of Gloucester, although this is already	No clear case for inclusion, given that the land does not perform the Green Belt role as defined by the original reasons for designation and this area would not physically link to the main area of Green Belt. Unrestricted sprawl could be controlled through other policy measures. The area was suggested as a possible area for inclusion in the previous JSA work.



Area and rationale for consideration	Evaluation	Recommendation
eastern part forming part of open countryside, although presence of motorway.	protected through the Country Park.	
<ul> <li>South-east of Brockworth (east of the A46, south of the A417)</li> <li>To provide protection to the countryside character of the area</li> <li><i>Existing land use:</i> varying, some arable.</li> <li><i>Proximity and relationship to the built-up area:</i> limited proximity to built up area, although links to south-eastern part of Brockworth across A46.</li> <li><i>Degree of enclosure/openness:</i> much of area is very open.</li> <li><i>Distance and visual connection to historic urban centres/key urban areas:</i> views from Coopers Hill.</li> <li><i>Relationship to the countryside:</i> strong relationship particularly to south and east.</li> </ul>	Check unrestricted sprawl - may assist in preventing south- eastern expansion of Brockworth and ribbon development in this area. Prevent merger - no direct role. Safeguard countryside from encroachment - no obvious strong long term boundaries. Preserve the setting of towns - no direct role.	No clear case for inclusion, given that the land does not perform the Green Belt role as defined by the original reasons for designation. This area is already protected by AONB designation which will assist in preventing unrestricted sprawl.

5.4.5 Overall, the case for extension of the Green Belt is a limited one, with land immediately to the south of Cheltenham (south of Leckhampton, south-west of Farm Lane) having the strongest case. National Policy, in the form of PPG2 and emerging policy in the form of the Draft National Planning Policy Framework, does not make any reference to designating 'compensatory' Green Belt land and therefore any additions need to meet the purposes of including land in Green Belts and particularly the purpose of separation between Cheltenham and Gloucester. Apart from land south-west of Farm Lane, none of the other areas considered play a role in the separation of Cheltenham and Gloucester. Restraint policies other than Green Belt policies could be used to manage development in those areas where there is particular development pressure.

# 5.5 Comparison of Results with Previous Local Green Belt Studies

- 5.5.1 Previous local Green Belt studies as detailed below are referenced in section 2.8 of this report and are summarised in Appendix B.
  - Strategic Green Belt Review; South West Regional Assembly (SWRA) February 2006.
  - Cheltenham and Gloucester Joint Study Area Green Belt Review: Strategic Re-Assessment of the Green Belt.
  - Cheltenham Green Belt Review; AERC March 2007.
  - Gloucester, Cheltenham and Tewkesbury Urban Extensions Boundary Definition Study, Entec, 2010.



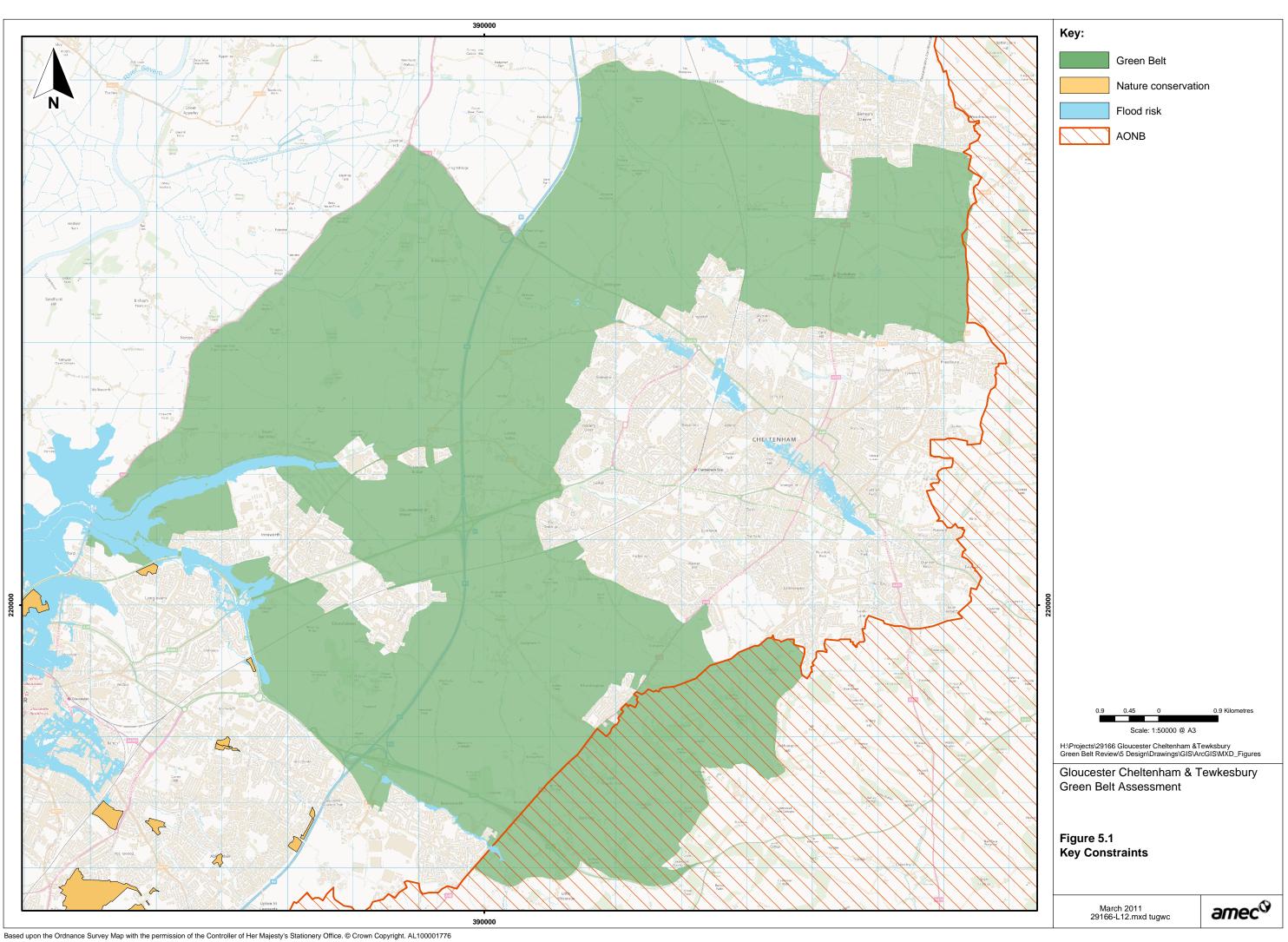
- 5.5.2 The Urban Extensions study only considered those areas of Green Belt that were identified through the Secretary of State's Proposed Changes (the Draft Revised RSS). The aim of the study was to consider the capacity of these areas, the landscape impacts and appropriate long term Green Belt boundaries. This study was not an assessment of all Green Belt land, but was focused on those areas of search identified through the Draft Revised RSS. It is therefore not included in the table in Appendix E of this report which sets out a comparison of the broad findings of the SWRA Strategic Green Belt Review (the results of which are based on the JSA work), the AERC Cheltenham Green Belt Review and this AMEC Strategic Assessment.
- 5.5.3 It should however be noted that direct comparison of the specific results is not possible as the parcels of land considered are not the same in all assessments. The reasons for differences in the results are set out below.
  - The AERC study includes a number of elements that are not referenced in PPG2 in relation to the purposes of the Green Belt. The AMEC study is purely based on the five purposes of including land in the Green Belt as set out in PPG2 and does not introduce other elements which are being considered through other evidence base studies.
  - The AERC study considers smaller parcels of land immediately adjoining the urban area within Cheltenham Borough's boundary, whereas the AMEC work considers all of the Green Belt in the JCS area, and thus considers larger parcels in a more strategic approach. This is because until the likely required level of development on Green Belt sites is known, the number and size of sites cannot be established. Once these requirements are known and other elements of the evidence base are complete, further work on the capacity of sites and appropriate Green Belt boundaries can be undertaken. The outer boundary of the AERC parcels is purely based on the Cheltenham Borough boundary, which in some areas are just field boundaries, not boundaries that would be considered to be robust long term Green Belt boundaries. No plans of particular parcels were published with the JSA work.
  - The AERC work involved consultations/workshops with stakeholders to seek their views on the Green Belt. Whilst this may have been appropriate to the remit of the AERC study, this approach would not be consistent with AMEC's independent strategic assessment as stakeholders such as community groups will all have their own particular interests and are often most interested in particular localities rather than having a more independent overview. Stakeholder engagement on matters relating to the Green Belt will be undertaken as part of the Joint Core Strategy consultation, ensuring an opportunity for everyone to comment/respond to the emerging policy.
- 5.5.4 The SWRA Green Belt report concluded that there are two areas of the Green Belt where development would have the least harm, north of Gloucester and land north-west of Cheltenham. These are two of the three areas identified in this AMEC assessment as making a more limited contribution to the Green Belt purposes. The third location identified in this AMEC report as making a more limited contribution to the Green Belt purposes, north of Brockworth was assessed as third least harm by the SWRA report, but scored more highly in the JSA work.
- 5.5.5 Another key difference between results relates to the land between Cheltenham and Bishop's Cleeve. The AMEC assessment and AERC assessments are very similar for this area, treating it as key to the original purpose of designation (as extended in 1981). However, the JSA work did not score this as highly in terms of Green Belt purposes. Other differences in results between the AMEC and AERC

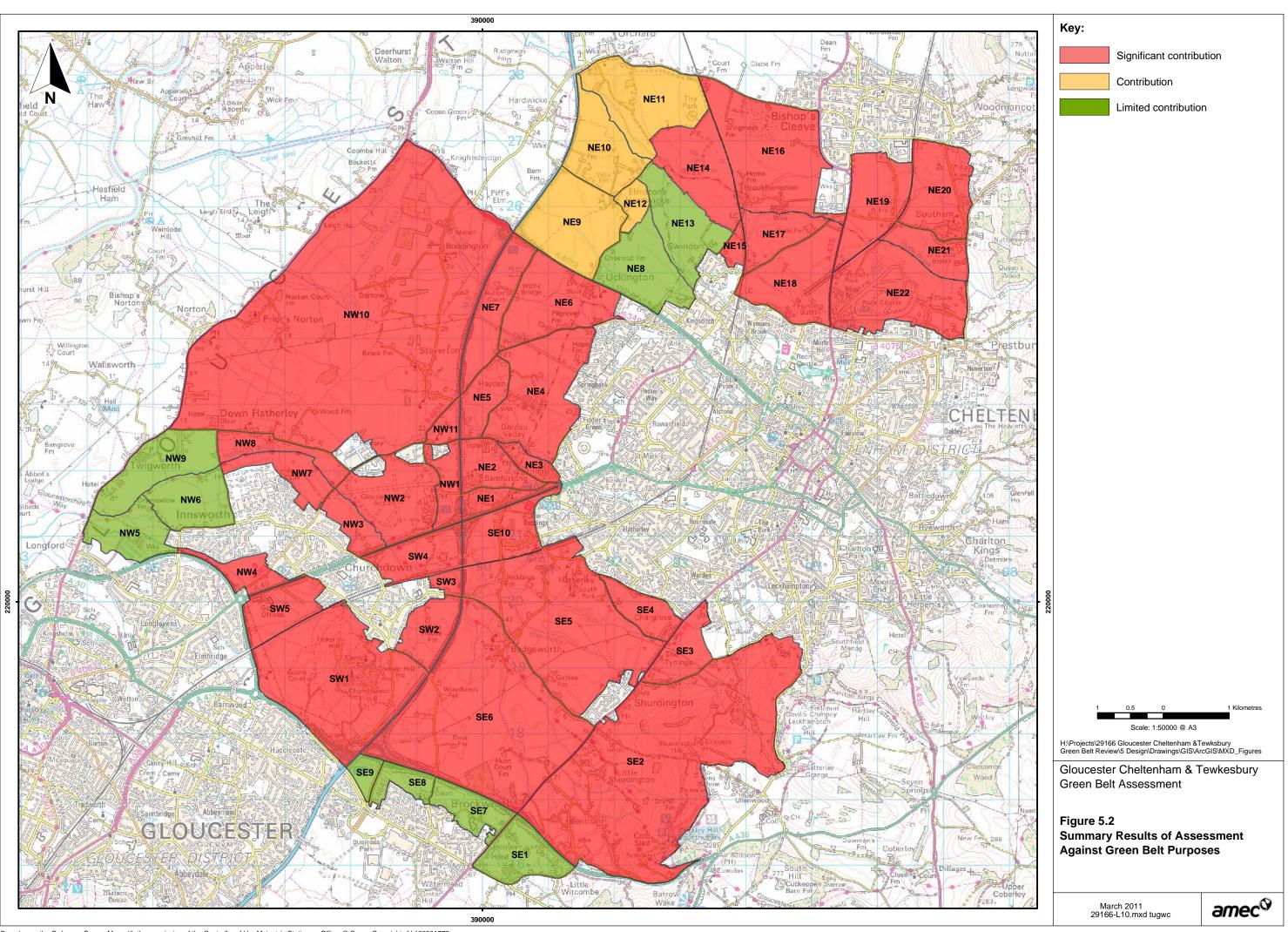


assessments mostly relate to the very different parcel sizes that are considered, as the AERC report only relates to land in Cheltenham Borough making direct comparison difficult.

## 5.6 Summary

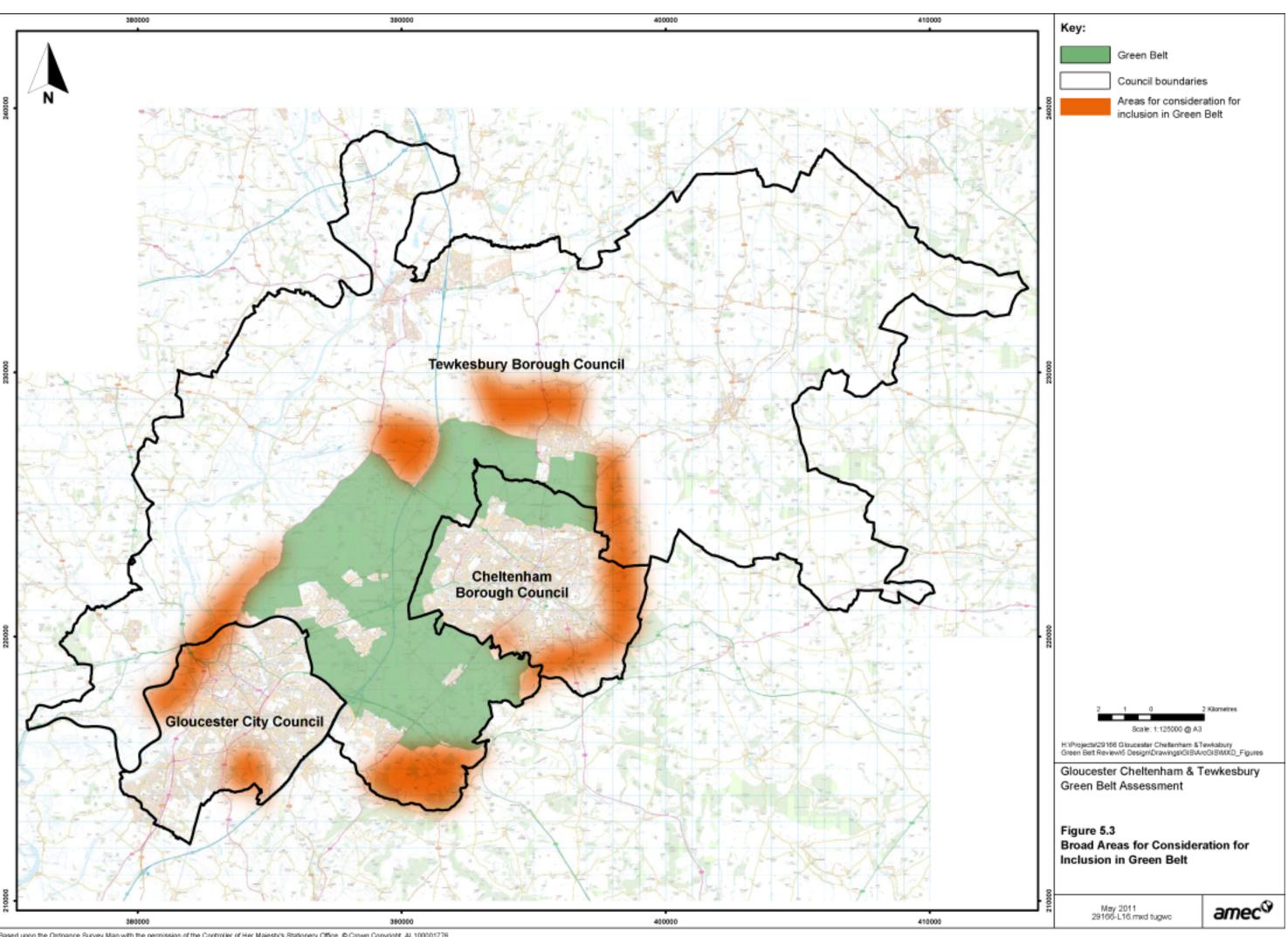
- 5.6.1 The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes. There needs to be very careful consideration of other evidence before any of these segments are considered for release from the Green Belt. These segments play a key role in the separation of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, the original purpose of the designation. One cluster of segments was identified as making a contribution towards Green Belt purposes and three clusters of segments were identified as making a limited contribution towards Green Belt purposes. The latter segments could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:
  - land to the north, west and east of Brockworth;
  - land to the west of Innsworth, north of Longford and around Twigworth; and
  - land to the west of Kingsditch and Swindon (north-west of Cheltenham).
- 5.6.2 Where there are no obvious robust boundaries, or such boundaries are a considerable distance from the urban edge, it may be necessary to define a new robust Green Belt boundary through masterplanning. This may be the case at north-west Cheltenham or for other areas where development requirements or other elements of the evidence base suggest that there should be consideration of release from the Green Belt but there are no obvious boundaries.
- 5.6.3 As set out in PPG2 and in the Draft National Planning Policy Framework, when defining boundaries as part of a plan review, there is a need to ensure that the boundaries will not need to be altered at the end of the plan period, and therefore that longer term requirements are considered and where necessary safeguarded land identified.
- 5.6.4 With regard to the potential additions to the Green Belt, the case is a limited one, with land immediately to the south of Cheltenham having the strongest case. Any Green Belt extension must be limited to those areas that make a contribution to the five Green Belt purposes and the original purpose of designation, the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve, as PPG2 does not make any reference to increasing the area of land in the Green Belt solely to compensate for areas of Green Belt released for development. Other planning policies could be used to manage development in those areas where there is particular development pressure.





Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office. © Crown Copyright. AL100001776





Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office. © Crown Copyright. AL 100001776



# 6. Strategic Green Belt Policies

## 6.1 Introduction

- 6.1.1 The study brief requires preparation of a suite of strategic planning policies that will embed the principles of PPG2 in the JCS. Specific policy wording is not suggested at this stage, as this cannot be drafted until there is further certainty regarding Green Belt releases in the short and longer term. These decisions need to be informed by other elements of the evidence base and other strategic considerations. However, this chapter sets out some of the key issues for consideration with regard to strategic Green Belt policies.
- 6.1.2 This chapter also considers examples of Green Belt policies that have recently been adopted and been through examination to help inform future drafting of policies for the JCS. The adopted Green Belt policies from the Cheltenham Borough Local Plan Second Review (Adopted 2006) and the Tewkesbury Borough Local Plan (Adopted 2006) have also been reviewed. Issues and approaches to Green Belt policies are identified and consideration is also given to alternative designation options which may also have a useful role to play in preventing development in certain areas.

## 6.2 Current Practice

- 6.2.1 Separate, detailed policies covering Green Belt issues are relatively uncommon in development plans, and probably more common in the old Local Plans than the emerging Core Strategies. In the latter case, the need to avoid repeating government guidance in local policy appears to be resulting in the use of passing references to Green Belt as part of development management, rather than a specific policy. Nevertheless, where authorities are particularly concerned about development pressure, then specific policies have been included in adopted Core Strategies. Three examples of policy have been identified: a general approach, a more specific approach and a very general protection policy. These policies are presented in full at Appendix F.
- 6.2.2 The relatively detailed policies are those of Tandridge (centred on Caterham/Oxted, Surrey) and Tunbridge Wells (Kent), both of which have opted for a Strategic Policy. Tandridge District is around 94% Green Belt and Tunbridge Wells is around 22% Green Belt. The content of the fuller policies of Tandridge and Tunbridge Wells centres on:
  - confirmation that there will be no change in Green Belt boundaries, with the proviso that sufficient development land can be found in the built-up areas;
  - where changes are proposed, sustainable locations will be preferred, having regard to the need to prevent coalescence;
  - dispersal of the impact of any greenfield land release through allocation of a number of sites;
  - maintenance of a long-term land reserve through safeguarded land to ensure that Green Belt boundaries do not have to be altered over the plan period (although this could be identified in a Site Allocations DPD);



- a general presumption against development that would not preserve openness; and
- infilling of major developed sites in the Green Belt.
- 6.2.3 In both cases, the approaches used are arguably more strategic in nature, allowing for the pragmatic release of Green Belt land. By contrast, Chelmsford's approach simply states that the Green Belt will be protected and development steered to the major settlements, the implication being that sufficient land for development is available in these areas.

## 6.3 Key Considerations for JCS Strategic Green Belt Policy

- 6.3.1 The style and content of a Green Belt policy for the Joint Core Strategy (if indeed it is considered that a separate policy is required), will be dependent upon a variety of factors. A number of issues for consideration for inclusion in Green Belt policy are set out below:
  - the scale of revisions to Green Belt boundaries in light of development pressure;
  - the likely need for safeguarded land or a long-term land reserve to meet future needs and to prevent further alterations to the Green Belt when the JCS is next reviewed;
  - the need to re-affirm the purposes of the original Green Belt designation;
  - the need for robust long term Green Belt boundaries;
  - the need to set out principles for development in the Green Belt; and
  - the suitability of any sites for designation as major developed sites in the Green Belt.
- 6.3.2 Given the very tight Green Belt boundary around the urban area, identifying safeguarded land/reserve sites is likely to be key so that Green Belt boundaries do not have to be altered at the next plan review and to ensure that sustainable patterns of development are promoted. Such sites should be capable of development when needed, but any policy will need to ensure their protection until they are required for development.
- 6.3.3 In addition to re-affirming the overall purposes of the Green Belt, other issues for consideration in policy include setting out the type of land uses that are and are not likely to be appropriate in the Green Belt. In the case of inappropriate development, in accordance with PPG2, the need for applicants to demonstrate very special circumstances to justify why the harm is outweighed by other considerations could be stressed. However, this should not simply repeat PPG2.
- 6.3.4 There are a number of settlements in the JCS area that are inset to the Green Belt. A key consideration will be whether or not there are any areas that should be identified as major developed sites in the Green Belt. Gloucestershire Airport is located in the Green Belt, although currently policies CH1 and CH2 of the Tewkesbury Borough Local Plan saved policies allow for infilling in a small part of the airport for essential airport relates uses. Consideration could be given to the appropriateness of identifying part of the airport site as a major developed site in the Green Belt. This will very much depend on any growth plans for the airport and its role in the local economy. Elsewhere in the country, airports that have been



removed from the Green Belt tend to be those that are identified for significant passenger growth or which have a significant impact on the economy which may not be as relevant to Gloucestershire Airport. The fact that the Airport is located in the narrowest part of the gap between Gloucester and Cheltenham should also be a consideration.

- 6.3.5 Cheltenham Racecourse is another example of a site where the Cheltenham Borough Local Plan Second Review policy permits development that is horse racing related within the existing built up part of the site, as identified on the proposals map. Consideration could be given to identifying part of the site as a major developed site in the Green Belt, although this would not significantly alter the policy that applies to the site at present. Another issue for consideration is that the racecourse is located within the narrow gap between Cheltenham and Bishop's Cleeve.
- 6.3.6 Limited infilling (in accordance with Annex C of PPG2) would be permitted at sites identified as major developed sites. The JCS team may consider it appropriate to be proactively involved in working up development briefs/masterplans for any such sites to ensure that their impact is appropriate to their location in the Green Belt.
- 6.3.7 A single Green Belt policy could incorporate the following:
  - clarity on maintenance and protection of the Green Belt as shown on the Proposals Map;
  - protection of safeguarded/long term reserves (as shown on the Proposals Map) until such time as they are required for development;
  - presumption against inappropriate development (without simply repeating national policy) with particular reference to the key reasons for designation; and
  - site specific policy relating to areas such as the airport, racecourse and settlements in the Green Belt where limited expansion may be permitted.
- 6.3.8 Such a policy should not repeat national policy as set out in PPG2. The Government intends to produce a single national planning policy which is likely to incorporate national Green Belt policy and replace PPG2. The content of this may influence the wording of the JCS policy, particularly if less detailed guidance that currently provided in PPG2 is set out.





# 7. Summary and Recommendations

## 7.1 Background and Policy Context

- 7.1.1 This Green Belt Assessment was commissioned by Cheltenham Borough Council on behalf of Cheltenham Borough Council, Tewkesbury Borough Council and Gloucester City Council. The three authorities are working together to produce a Joint Core Strategy. This Green Belt assessment forms part of the LDF evidence base and should not be viewed in isolation, but in the context of the entire evidence base. The recommendations need to be considered again once the scale of development is known and once good urban design and sustainability issues have been considered.
- 7.1.2 The brief was to undertake a qualitative Green Belt assessment specifically focussing on an assessment against the five purposes of including land in Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995).
- 7.1.3 In May 2010, the Coalition Government revoked Regional Spatial Strategies and set out a clear commitment to abolish them through the Localism Bill. Following a legal challenge, RSSs have since been re-instated. However, they will be revoked once the Localism Bill comes into effect, likely to be by April 2012. Prior to these events, the Draft Revised RSS for the South West identified a level of growth for the Gloucester and Cheltenham Housing Market Area (HMA) between 2006 and 2026. The Draft also identified five broad Areas of Search that were identified to meet the growth needs of Gloucester and Cheltenham, although they included areas in Tewkesbury Borough. Four of these areas were in the Green Belt.
- 7.1.4 The JCS authorities are now reviewing their development requirements locally as part of the evidence base for the JCS, with this work being led by Gloucestershire County Council. This will be a key factor in determining which, if any sites should be released from the Green Belt for development.
- 7.1.5 The study provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the JCS Team.

## 7.2 Assessment Methodology

- 7.2.1 The assessment methodology has been developed in response to Green Belt reviews and local Green Belt studies that have been undertaken. A summary of the approach to this study is set out below:
  - Mapping exercise to identify key constraints.
  - Identification of strategic Green Belt segments using OS maps, aerial photos and site visits, with strong boundaries being used to define boundaries of the segments.
  - Assessment of each segment against each of the five purposes of including land in the Green Belt as set out in PPG2, paragraph 1.5 (four purposes were actually assessed as the fifth purpose could apply equally to all sites so was scoped out). The results of this were recorded using a matrix and a simple traffic light system. An overall traffic light score was then arrived at for each segment and mapped.



- The results of the above were summarised through segments being grouped into clusters and recommendations were made for each cluster of segments. Where recommendations are made that particular segments/clusters of segments require further consideration, this does not mean that they should be released from the Green Belt, but that they could be considered further depending on development requirements and the findings of other evidence base studies.
- Consideration was given to possible areas for inclusion in the Green Belt and these areas were assessed against the five purposes of including land in Green Belt.

## 7.3 Summary of Assessment Results and Recommendations

- 7.3.1 The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes and which should not be considered further for release from the Green Belt unless there is a very strong case emerging from other evidence base studies. These segments are:
  - land between Bishop's Cleeve and Cheltenham;
  - land between Cheltenham and Gloucester to the east of the M5;
  - land between Gloucester and Churchdown to the west of the M5;
  - land between Cheltenham and the M5 north of the A40;
  - land to the west of the M5, north of the A40 and north and south-west of Churchdown;
  - land to the north of Innsworth; and
  - land to the west of the M5 and north of the B4063.
- 7.3.2 The recommendations in relation to these clusters of Green Belt segments that make a significant contribution to the Green Belt are summarised in Table 7.1. These clusters do not merit further consideration for potential release from the Green Belt unless there is a strong case emerging from other evidence base studies.



#### Table 7.1 Recommendations for Clusters that make a Significant Contribution towards Green Belt Purposes

Cluster of Green Belt Segments	Recommendation
Land between Bishop's Cleeve and Cheltenham NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981).
Land between Cheltenham and Gloucester to the east of the M5 SE2, SE3, SE4, SE5, SE6, SE10	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.
Land between Gloucester and Churchdown to the west of the M5 SW1, SW2, SW3, SW4, SW5, NW4	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.
Land between Cheltenham and the M5 north of the A40 NE1, NE2, NE3, NE4, NE5, NE6, NE7	This area is critical to preventing the sprawl of Cheltenham and towards the south, the merger of Cheltenham and Churchdown.
Land to the west of the M5, north of the A40, and north and south-west of Churchdown NW1, NW2, NW3	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, being already heavily intruded towards its southern extent with Airport related uses.
Land to the north of Innsworth NW7, NW8	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, particularly towards the east of these segments.
Land to the west of the M5 and north of the B4063 NW10, NW11	This forms the bulk of the extent of the Green Belt in this north-western quarter, with the separation function stronger towards the south and eastern area of the segments.

#### 7.3.3 One cluster of segments was identified as making a contribution towards Green Belt purposes as follows:

- land north-west of Cheltenham.
- 7.3.4 The recommendation in relation to this cluster that makes a contribution towards Green Belt purposes is summarised in Table 7.2.

#### Table 7.2 Recommendations for Cluster that makes a Contribution towards Green Belt Purposes

Cluster of Green Belt Segments	Recommendation
Land north-west of Cheltenham NE9, NE10, NE11, NE12	Overall, these segments make a contribution to Green Belt purposes by virtue of providing the wider setting for Cheltenham and Bishop's Cleeve, but they are not critical to the Green Belt and play a more limited role in separation of the settlements. These segments play a role in preventing encroachment, as there are some strong boundary options, but they are divorced from the urban edge. They play a role in preventing ribbon development in some areas. If land was removed from the Green Belt in adjoining segments NE8 or NE13, then segments NE9, NE10, NE11 and NE12 would still make a contribution towards the Green Belt, although it may be a more limited contribution, particularly if any development in NE8 or NE13 creates a robust new Green Belt boundary.



- 7.3.5 Three clusters of segments were identified as making a limited contribution to Green Belt purposes, and which could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:
  - land to the north, east and west of Brockworth;
  - land to the west of Innsworth, north of Longford and around Twigworth; and
  - land to the west of Kingsditch and Swindon.
- 7.3.6 The recommendations in relation to these clusters that make a contribution towards Green Belt purposes are summarised in Table 7.3.

Cluster of Green Belt Segments	Recommendation
Land to the north, east and west of Brockworth SE1, SE7, SE8, SE9,	Intrusion of urban uses (particularly towards the east) compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re-examining its designation and boundaries as the A417 would be a strong long term boundary to prevent encroachment. Due to their enclosure on all sides by major roads, these segments serve little or no Green Belt function.
Land to the west of Innsworth, north of Longford and around Twigworth NW5, NW6, NW9	The openness of this tract is compromised by intrusive development throughout its extent. Combined with limited function in preventing the merger of towns, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries.
Land to the west of Kingsditch and Swindon NE8, NE13	Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt. These segments make a very limited contribution towards the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve.
	As it is more difficult to identify clear Green Belt boundaries within these segments, any development within the segments or parts of the segments would require strong Green Belt boundaries to be created through good masterplanning.

#### Table 7.3 Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes

7.3.7 On the basis of the above recommendations, this study has demonstrated that there are areas of Green Belt that merit further consideration for possible removal from the Green Belt, should Green Belt land be required now or in the long term, and should it be appropriate in light of the findings of the other elements of the LDF evidence base, in particular those relating to development levels and sustainable patterns of development and landscape. Consideration should be given to the allocation of safeguarded land to prevent the need for further Green Belt review at the end of the plan period.



- 7.3.8 With regard to possible additions to the Green Belt, of the seven broad areas that were assessed, the land south of Leckhampton (south-west of Farm Lane) has potential to be added. National Policy, in the form of PPG2 does not make any reference to designating 'compensatory' Green Belt land and therefore any additions need to meet the purposes of including land in Green Belts and particularly the purpose of separation between Cheltenham and Gloucester. Apart from land south-west of Farm Lane, none of the other areas considered play a role in the separation of Cheltenham and Gloucester. The JCS team should give consideration to other policies that can be used to prevent development, such as areas of restraint policies, open countryside policies, and limiting opportunities through careful designation of settlement boundaries.
- 7.3.9 Issues for consideration of draft policy wording have been set out, to be taken further once there is clarity on the agreed way forward with regard to Green Belt policy in the JCS and once other aims and strategies have been progressed. This has been informed by review of current practice in Green Belt policy, i.e. policies that have been tested at Examination and adopted as policy, and by a review of current Local Plan policies covering the JCS area.





# Appendix A SW RSS: Panel Comments on Green Belt Areas of Search

## East of Gloucester/Brockworth

With regard to the additional Area of Search at East Gloucester/Brockworth, paragraph 4.3.28 of the Panel Report states that:

"The Panel considers that land within this area [south of A417, west of A46] could be developed without compromising the purposes of the wider Green Belt hereabouts inasmuch as sprawl, merging and encroachment into the countryside would all be held in check by the bordering road network, and in its present undeveloped state it makes no positive contribution to the setting or character of the city or to urban regeneration."

### **Gloucester North**

The Panel notes that this Area of Search is supported by the South West Draft RSS Urban Extension Evidence Base Review. Paragraph 4.3.29 of the Panel Report states that:

"The Regional Flood Risk Appraisal bears on part of this. Nonetheless, the Panel observes that there is scope to extend northwards onto higher land further from the flood risk area without impinging on Green Belt purposes, not least because planned outward growth of the urban area would not amount to unrestricted urban sprawl...... planned development in this sector would not impinge on the gap between Gloucester and Cheltenham, give rise to any material impact on the setting or character of either settlement, or undermine the wider purposes of the Green Belt hereabouts."



# **Cheltenham South**

The Panel Report states at paragraph 4.3.30 that:

"Some participants have advocated ribbon development along the A40.... It is the Panel's view that the Green Belt continues to serve a useful purpose here in preventing the two settlements from merging and thus protecting their distinct identities. We do not therefore support any significant encroachment into Green Belt between the two settlements here or elsewhere. There are, nonetheless, some small areas of land around the southern edge of Cheltenham that do not lie within the Green Belt and which have long been the subject of dispute over development potential. Land at Leckhampton/Shurdington is the largest of these."

The Panel Report goes on to note that the Cheltenham Green Belt Review considered that the land at Leckhampton/ Shurdington did not warrant Green Belt designation, and the Panel agreed with these findings.

## **Cheltenham North**

The Panel accepts that it should be possible to find scope for some additional dwellings at this Areas of Search without undermining Green Belt purposes. It did however note that any significant eastward extension should be avoided in order to protect the separate identities of Cheltenham and Bishop's Cleeve.

## **Bishop's Cleeve**

The Panel concluded that development to the south of Bishop's Cleeve would diminish the separation from Cheltenham which would be objectionable for the same reasons as land close to Cheltenham racecourse. It goes on to note that land to the north of the settlement is unconstrained by existing Green Belt, and in the Panel's view this area provides ample opportunity for sustainable strategic future outward growth of the settlement.

### **General Green Belt Issues**

The Panel rejected the Draft RSS proposed addition to the Green Belt north of Bishop's Cleeve and to the south of Gloucester due to the fact that sprawl is restricted by the floodplain and the Cotswold Area of Outstanding Natural Beauty (AONB) in these locations. The Panel noted that the fact that the existing Green Belt does not completely surround either settlement seems to recognise its main original purpose, which was to maintain the separation between Gloucester and Cheltenham. It is also noted that in practice, unrestricted sprawl and countryside encroachment here are limited by the combined presence of the flood plain and the Cotswold's AONB. The Panel



goes on to state that it sees no justification in PPG2 for increasing the extent of the Green Belt solely to compensate for losses arising from the urban extensions/Areas of Search that are recommended.





# Appendix B Local Green Belt Studies

# Strategic Green Belt Review, Colin Buchanan Associates, SWRA (2006)

This strategic review of Green Belts in the South West was undertaken to inform preparation of the RSS for the South West, and in light of the requirement in RPG10 to critically review the Green Belt to examine whether boundary alterations were needed to allow for long term sustainable development needs. The aim was to undertake an assessment of the technical work already carried out in the area and to make recommendations for a methodology that could be used by authorities when undertaking Green Belt Assessments in the region.

The study reviewed the methodologies of the Green Belt reviews undertaken in the South West and concluded that certain aspects of the methodology are common to all reviews, although it did note that in many cases objectivity in development and using the analysis was lost by the arbitrary and apparently inconsistent application of local knowledge (good, excellent or otherwise).

With regard to the Cheltenham and Gloucester work, the study noted that a sound approach was used, although more explanation was required. It also notes that there were areas of Green Belt that were not assessed or considered for release. The lack of transparency of the scoring system was identified as a weakness.

The study concludes that across the region, there are limited numbers of locations where urban expansion could be achieved without significantly and adversely affecting the purpose of the Green Belts. It concludes that an assessment of the Green Belt based on an understanding of their original purposes has not been undertaken. With regard to the time horizon of the Green Belt reviews, it is noted that as their areas of search were limited, the reviews will probably not be able to provide for the time period beyond the time horizon of the RSS. The study notes that for the reviews to have had a longer timescale they would need to have considered more sustainable strategic options.

The study noted that the following areas of work still needed to be undertaken: document review, definition of purpose, establishment of sustainability criteria and search area database, and application of criteria to search area database.

The aim of the study was not to identify precise locations for Green Belt review, but to identify the general extent of Green Belt in the region and to identify where the rationale for inclusion in Green Belt is relatively weak and where it is stronger. The report notes that for Cheltenham and Gloucester, the locations where harm caused to Green Belt appears to be least, based on available information and discussions with JSA authorities are North Gloucester and North West Cheltenham.

29166rr013



# Cheltenham and Gloucester Joint Study Area: Strategic Re-assessment of the Green Belt

A Green Belt Officer Working Group was established, and in the context of RPG10's requirement to consider how best to meet longer term development needs in the area, it considered the purposes for Green Belt designation in Gloucester/Cheltenham. It also undertook site visits in the area in order to establish the appropriateness for Green Belt designation in different areas on the edge of the settlements. This was a broad assessment of the Green Belt to enable strategic options for future directions for development to be consulted upon. It did not look at defining boundaries or the issue of phasing.

With regard to the purposes of the Green Belt, the Group's findings are summarised below.

## To check the unrestricted sprawl of large built-up areas

The Group considered that in the era of plan-led development, the type of unplanned sprawl that this purpose was originally aimed at preventing should not occur. It was considered that preventing development in areas that cannot be easily linked to existing town centres by public transport could fall into this category.

## To prevent neighbouring towns from merging into one another

The Group considered that this was not so much about loss of character, but more about visual separation.

### To assist in safeguarding the countryside from encroachment

The Group considered that a properly plan-led approach to development should minimise the spread of development and minimise the intrusion of the urban form on the rural areas around the PUAs. The Group noted that although landscape quality is not a relevant consideration in the designation of Green Belts, certain key landscape features could be considered for inclusions as they provide a backcloth to views across the Severn Vale that are fundamental to the appreciation of the open countryside.

### To preserve the setting and special character of historic towns

The Group considered this to be clear and easily understood and that it is particularly relevant where there are cherished views of historic areas/features set beyond a rural foreground.

### To assist in urban regeneration by encouraging the recycling of derelict and other urban land

This was considered to be relevant insofar as, within a long term plan, there needs to be robust phasing and priorities set to ensure that recycling of land within the PUAs is fully exploited. The Group noted the importance of phasing of safeguarded land to encourage recycling of previously developed land.

The Group assessed broad sectors of the urban edge in terms of its value in respect of the five purposes of including land in the Green Belt. Scores of '0' (little or no importance), '1' (some importance) and '2' (high importance) were used. The result was that the Working Group considered that there is scope to remove land north of



Gloucester and north-west of Cheltenham without affecting, in any meaningful way, the sense of visual separation between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve.

The Group also concluded that some additional areas could be added to the Green Belt, including the Cotswold escarpment along the eastern edge of Cheltenham and Gloucester (to give extra protection to their open countryside character), along the western edge of Gloucester (to safeguard the historic setting of central Gloucester), to the south of Gloucester and to the north of Bishop's Cleeve (to prevent development sprawling into countryside areas that are poorly related to the centres of the PUAs).

# Cheltenham Green Belt Review, AERC, March 2007

The purpose of this review was to assist Cheltenham Borough Council in re-designating areas of Green Belt. The methodology comprised an initial identification of sub areas for assessment across the existing Green Belt and between the Green Belt and the built-up area. A wider study area was also identified including land in Tewkesbury Borough across which the implications of the study would be considered.

The assessment approach utilised a scoring system comprising a set of defined measurable criteria relating to each Green Belt purpose (for example, distance from the built-up area, nature conservation value and agricultural land quality). Once each score was determined, a ranking multiplier was added to derive an overall score enabling each sub-area to be classified as either 'high', 'average' or 'low' in relation to the extent to which they met the purposes of including land in Green Belts.

To support the sub-area analysis, an assessment of development constraints in relation to Green Belt boundaries was undertaken. This focused on mapping 'hard' constraints (i.e. those constraints which preclude development) and 'soft' constraints (i.e. those constraints which may act as a barrier to development but which are not insurmountable) to assist in the identification of the most suitable development location. Finally, the Review undertook an analysis of the existing Green Belt boundary in terms of its defensibility, identifying 'strong' and 'weak' sections to highlight those areas in need of strengthening and to identify new potential Green Belt boundaries.

The Cheltenham Green Belt Review drew upon the earlier Joint Green Belt Study, and the SWRA Strategic Green Belt Review. The ranking of the Green Belt purposes used in the assessment reflected the key purposes which were to prevent towns merging and to check urban sprawl. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve has the greatest role in supporting the objectives of the Green Belt, whilst the areas to the north-west and west of Cheltenham scored lowest in relation to these objectives. The study found that much of Cheltenham's inner Green Belt boundary is likely to be defensible in the foreseeable future due to either its long establishment or its strong boundary features. It was concluded that the non-Green Belt land included in the detailed Study Area between the Green Belt and the built-up area, did not achieve high scores and would not make a major positive contribution to Green Belt purposes with the exception of a sub-area to the south-east of Swindon village.



The study noted that there were limited opportunities to provide suitable 'compensatory' Green Belt in Cheltenham to replace land lost to development within the Green Belt, as many of the potential sites would fall within Tewkesbury or Gloucester. The study was unable to identify alternative defensible boundaries to those already in existence, or even alternatives more defensible than the weaker existing Green Belt boundaries in the Borough.

The study notes the need for future changes to the Green Belt to take into account important constraints to new development, the AONB and areas at risk from flooding. It advises that where weak Green Belt boundaries exist, these should be strengthened through the LDF, either as part of the process of defining new land allocations or through land management in consultation with landowners.



# Appendix C Review of Green Belt Studies

# Cheltenham and Gloucester Joint Study Area Green Belt Review

A Joint Study Area Steering Group established a separate Green Belt Working Group, which was tasked with examining the purpose of the Gloucester/Cheltenham Green Belt. The effectiveness of the Green belt was assessed by the Group in relation to the five purposes of the Green Belt identified within PPG2. The main purposes identified included:

- preventing towns from merging;
- safeguarding the countryside; and
- encouraging recycling of land.

Various areas of the Green Belt were scored in order to demonstrate their value in relation to these objectives. It was noted that the north-west of Cheltenham scored poorly. The study also demonstrated that an area within the Cotswold Escarpment, to the eastern edge of Cheltenham, could provide a valuable addition to the Green Belt.

## Cheltenham Green Belt Review

The Cheltenham Green Belt Review was undertaken in March 2007 and seeks to assist Cheltenham Borough Council in re-designating areas of Green Belt. The methodology comprised an initial identification of sub areas for assessment across the existing Green Belt and between the Green Belt and the built-up area. A wider Study Area was also identified including land in Tewkesbury Borough across which the implications of the study would be considered.

The assessment approach utilised a scoring system comprising a set of defined measurable criteria relating to each Green Belt purpose (for example, distance from the built-up area, nature conservation value and agricultural land quality). Once each score was determined, a ranking multiplier was added to derive an overall score enabling each sub-area to be classified as either 'high', 'average' or 'low' in relation to the extent to which they met the proposes of Green Belts. To support the sub-area analysis, an assessment of development constraints in relation to Green Belt boundaries was undertaken. This focused on mapping 'hard' constraints (i.e. those constraints which preclude development) and 'soft' constraints (i.e. those constraints which may act as a barrier to development but which are not insurmountable) to assist in the identification of the most suitable development location. Finally, the Review undertook an analysis of the existing Green Belt boundary in terms of its defensibility, identifying 'strong' and 'weak' sections (see Table B1) to highlight those areas in need of strengthening and to identify new potential Green Belt boundaries.



Table B1	Defensible Boundary Classification
----------	------------------------------------

Strong	Weak
<ul> <li>Motorways</li> <li>Mainline (in use) railway line</li> <li>District Distributor Roads forming boundary (not</li> <li>bisecting Green Belt)</li> <li>Rivers, watercourses and significant drainage features</li> <li>Prominent physical features (i.e. ridgeline, non- intermittent waterways)</li> <li>Protected hedgerows/woodlands</li> <li>Residential development with strong rear boundaries</li> <li>Other development with strong established boundaries</li> </ul>	<ul> <li>Non-residential development with weak or indeterminate boundaries</li> <li>Residential curtilages</li> <li>Tree-lined public footpaths</li> <li>Other classified roads</li> <li>Disused railway lines</li> <li>Non protected hedgerows/woodlands</li> <li>Power lines</li> <li>Rights of Way</li> <li>Private/unmade roads</li> <li>Recreational field boundaries</li> <li>Park boundaries</li> </ul>

Source: The Cheltenham Green Belt Review (Cheltenham Borough Council 2007:43)

A review of Cheltenham's Green Belt has previously been completed. This review assesses the Green Belt around Cheltenham by using various sub areas and scoring the use/purpose of the Green Belt in these sub areas using a traffic light system. The methodology includes assessing:

- flood risk data;
- sustainability criteria;
- considering areas with cross boundary potential;
- identifying strong and weak Green Belt boundaries across the area; and
- mapping this information on various GIS layers.

The Cheltenham Green Belt Study is one of a number of studies providing data to support the preparation of the Cheltenham Local Development Framework, which will address the need to accommodate sustainable new development. Cheltenham Borough boundary is very tightly drawn around the town and no locations have been identified which provide the minimum depth of countryside normally required to meet the requirements of a functional Green Belt. To this extent the Cheltenham Green Belt is dependent upon adjoining areas within Tewkesbury Borough and Cotswold District Council to meet those requirements. The Cheltenham Green Belt Review has drawn upon the earlier Joint Green Belt Study of the Gloucester and Cheltenham Green Belt, and an independent review of other Sub-Regional Green Belt studies in the South West Region, as well as the Draft Revised RSS proposals.

The Study concludes that of the four existing Green Belt policies within the Local Plan, three policies, CO48, CO50 and CO51, contribute positively to Green Belt purposes, pass the relevant 'Tests of Soundness' required by Planning Policy Guidance 12, and are 'fit for purpose' for inclusion in the emerging Local Development

<sup>©</sup> AMEC Environment & Infrastructure UK Limited September 2011 29166rr013



Framework. The fourth Green Belt policy, policy CO49, is capable of contributing to Green Belt purposes and being 'sound' if minor amendments are made to it. One non-Green Belt policy in the Local Plan, policy TO113 relating to Cheltenham Racecourse, could also contribute to Green Belt purposes. The review concludes that a number of the sub areas (15) contribute significantly more to achieving Green Belt purposes than the others (63).

The ranking of the purposes used in the assessment reflect the views of stakeholders that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, and checking urban sprawl. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve has the greatest role in supporting the objectives of the Green Belt, whilst sub areas to the north-west and west of Cheltenham scored lowest in relation to these objectives. The Study found that much of Cheltenham's inner Green Belt boundary is likely to be defensible in the foreseeable future due to either its long establishment or its strong boundary features. It was concluded that the non-Green Belt land included in the detailed Study Area between the Green Belt and the built-up area, did not achieve high scores and would not make a major positive contribution to Green Belt purposes with the exception of a sub-area to the south-east of Swindon Village.

There are limited opportunities therefore to provide suitable 'compensatory' Green Belt, to replace land lost to development, within Cheltenham Borough and other sites may be sought in collaboration with the neighbouring authorities of Tewkesbury and Gloucester. The Study was unable to identify alternative defensible boundaries to those already in existence, or even alternatives more defensible than the weaker existing Green Belt boundaries in the Borough.

Future changes to the Green Belt will need to take account of important constraints to new development, the AONB and areas at risk from flooding. The Plan identifies areas to the peripheral west and north-west of the Borough for possible sustainable development, however these areas do not coincide with neighbourhoods free from major constraints or with areas making least contribution to Green Belt purposes, apart from the area to the north-west of Swindon Village.

Where weak Green Belt boundaries exist, these should be strengthened through the LDF, either as part of the process of defining new land allocations or through land management in consultation with landowners. The emerging Local Development Framework will be required to develop masterplans which are able to defend the boundaries of the Green Belt, whilst accommodating future sustainable development to satisfy Sub-Regional development requirements.

# Nottingham/Derby

The Nottingham-Derby Green Belt Review was published in 2006 and adopted a more qualitative based approach to scoring sub-areas, including potential extensions. This focused predominantly on the extent to which each met the five purposes of Green Belts but also included an assessment of the importance of each area in providing green infrastructure. Nevertheless, the outcome of the approach was broadly similar to that of the Cheltenham Green Belt



Review with each area scored and classified (high, medium and low) in relation to the extent to which it met the purposes of the Green Belts.

## Coventry

The Coventry Green Belt Review, completed in December 2007, combined Green Belt and sustainability criteria relating to nature conservation value, flood risk, transport and accessibility (see Box 1). The assessment sought to determine whether any Green Belt land within Coventry's boundaries could make a significant contribution to meeting long term development land supply needs and focused on two areas of search for expansion of the urban area, identifying those parts suitable for removal from the Green Belt (see Figure B.1).

#### Box 1 Coventry Green Belt Review: Criteria for assessment

Areas of land for release from Green Belt designation will only be recommended if built development on them would result in only modest visual impact on the open character of the Green Belt in the surrounding area. Modest visual impact is defined here as not giving the appearance of urban sprawl, reducing important gaps between urban areas and encroachment of the open countryside, thereby addressing purposes 1,2 and 3 of Green Belt in PPG2.

Release of designated Green Belt would not significantly harm or detract from views of the city centre or nearby historic towns. (PPG2 purpose 4.)

In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of that green wedge is not significantly damaged.

The addition of designated Green Belt land (including in green wedges) will be recommended only if it would significantly enhance the purposes, character or cohesion of the Green Belt.

The release of designated Green Belt land would not damage areas of significant nature conservation value (i.e. Site of Importance for Nature Conservation [SINC] or higher).

The release of designated Green Belt land is not in a defined floodplain (see Map 2).

Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking/cycling routes and social/ community/leisure facilities) are easily accessed. Boxes are for emphasis and are designed to contrast with the main text, e.g. for a case study or abstract.

### Purbeck

This study built upon the work of the South East Dorset Joint Study Area sub-regional Green Belt Review, undertaking a more localised and detailed review around the urban fringes of the District's main settlements and the outer boundaries of the Green Belt. The assessment utilized aerial photography together with the analysis of photographs taken from site visits to determine the extent to which each sub-area met the purposes Green Belts. The results were presented using a traffic light-based system to identify potential areas for further review.



# Appendix D Matrix of Green Belt Assessment Results



#### Assessment of Segments against Five Purposes of Green Belts

Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
SE1 - land to the south of the A417 and east of the A46.	(AONB)	Contribution - helps check sprawl eastward from Brockworth along A46 and ribbon development along Cirencester Road.	Limited contribution - forms eastern extent of Gloucester.	Contribution - some evidence of the eastward expansion of Brockworth beyond the strong boundary of the A46 into open countryside associated with linear development along the eastern edge of the A46. Urbanising influences around Cirencester Road to south of area. Strong boundary of A417 would contain future development.	Limited Contribution - provides context for the town, but no direct links with historic centres.	Predominantly agricultural (pasture and arable) land, abutting the scarp slope and within Cotswolds AONB. Some contribution to openness, but relatively weak given enclosure by the strong boundaries of the A46 and A417, and detachment from the main body of the Green Belt separating Cheltenham and Gloucester. Farmed land but strongly intruded by residential (around Cirencester Road), commercial (along A46) and agricultural development. Limited direct functional relationship with Brockworth because of severance by the A46. Although assessed as making a limited contribution to the Green Belt purposes, it is designated as AONB and therefore may not be considered appropriate for development for other reasons.	Limited Contribution
SE2 - land to the east of Shurdington Road (A46) and north of the A417.	Flood Plain (part) (AONB) Key Wildlife Site - part; with co-extensive SSSI	Significant Contribution - forms a clear southerly boundary to Leckhampton, particularly along Church Road and prevents further ribbon development between Leckhampton and Shurdington.	Significant Contribution - limits eastward expansion of Shurdington towards Cheltenham, thus maintaining the size of gap between Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to Leckhampton, defined by Church Road, Collum End Rise and Leckhampton Hill preventing encroachment. There are few strong boundary options, although there are urbanising influences around Shurdington.	Significant Contribution - maintains openness of land, emphasised by views from Leckhampton Hill and environs.	Forming the scarp slope of the Cotswolds AONB, this land is of critical importance to maintaining openness and distant views to land between Cheltenham and Gloucester, and as a backdrop to Cheltenham. Land is of broadly uniform character being enclosed fields and woodland on the scarp slope and coarser scale cropland towards Shurdington. Plays a key role in separating Gloucester and Cheltenham. There are no strong boundary options to prevent encroachment in the longer term.	Significant Contribution
SE3 - land to the south-west of Leckhampton, bounded by the A46 to the west and the Leckhampton Lane to the south.		Significant Contribution - part of separation between Leckhampton and Shurdington preventing further ribbon development between the two.	Significant Contribution - limits the merger of Leckhampton/ Warden Hill and Shurdington, (thus separating Cheltenham and Gloucester), there being significant ribbon development along the A46.	Significant Contribution - forms part of southern boundary to Leckhampton. Northern boundary is relatively weak however, comprising a field ditch and hedge line. There are no obvious strong boundary options to prevent longer term encroachment.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segment SE2.	Intensively farmed land of moderately sized fields with substantial hedgerows. Adjacent, and complementary, to segment SE2. A significant component of land separating Cheltenham and Gloucester. Acts to limit further ribbon development along the A46 which would close the gap between Leckhampton and Shurdington Relatively weak inner boundary, parallel to Farm Lane.	Significant Contribution
SE4 - land immediately to the south of Warden Hill, bounded by the A46 to the east, Up Hatherley Way to the north and Chargrove Lane to the south and west.		Significant Contribution - forms clear southern boundary to Hatherley preventing ribbon development along Up Hatherley Way and Shurdington Road.	Significant Contribution - limits joining of Leckhampton and Shurdington, thus separating Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to recent development at Hatherley, well defined by boundary of Up Hatherley Way preventing encroachment.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2 and SE3.	Intensively farmed land of moderately sized fields with well-tended hedgerows. Strong boundaries defined by Up Hatherley Way and Chargrove Lane. Forms the boundary to the outer edge of Cheltenham. Adjacent, and complementary to, segment SE5. Part of key land separating Cheltenham and Gloucester as it limits development between Leckhampton and Shurdington and ribbon development along the A46.	Significant Contribution
SE5 - land to the north-west of Shurdington, bounded by the A46 to the east, Chargrove Lane to the north-east, the Cheltenham-Gloucester railway line to the north-east and the M5 to the west.	Key Wildlife Site - part; with co-extensive SSSI	Significant Contribution - forms a clear southern boundary to Hatherley preventing ribbon development along Shurdington road and around Badgworth.	Significant Contribution - a critical component of land separating Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to recent development at Hatherley, well defined by boundary of Up Hatherley Way. There are no obvious strong boundaries to prevent development in the longer term.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2 and SE3.	Intensively farmed open expanse of land, with moderate to large sized fields, with strong structural hedgerow features, forming significant element of key land separating Cheltenham and Gloucester. Adjacent and complementary to segments SE3 and SE4 maintaining separation between Leckhampton/Hatherley and Shurdington. Adjacent, and complementary to, segment SE6, being key land separating Cheltenham and Gloucester. There are no strong boundaries to prevent longer term encroachment.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
SE6 - land bounded by the A417 to the south, M5 to the west, A46 to the east and Badgeworth Lane to the north.		Significant Contribution - prevents ribbon development along the A46 between Shurdington and Brockworth.	Significant Contribution - a critical component of land separating Cheltenham and Gloucester.	Significant Contribution - part of the open countryside separating Gloucester and Cheltenham. There are no obvious strong boundaries that would prevent encroachment in the longer term.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2, SE3 & SE5.	Intensively farmed open expanse of land, with moderate to large sized fields, with strong structural hedgerow features, forming a significant part of the land separating Cheltenham and Gloucester. Adjacent, and complementary to, segments SE5 and SE2, these being key parts of the land separating Cheltenham and Gloucester. There are no obvious strong boundaries to prevent longer term encroachment.	Significant Contribution
SE7 - land to the south of the A417 and west of Brockworth Road.		Contribution - prevents some northward sprawl from Brockworth and ribbon development along Mill Lane, although A417 forms a stronger northern edge to contain development.	Limited Contribution - arguably part of the wider belt of land separating Cheltenham and Gloucester, although limited connection with main extent of land due to severance by the strong boundary of the A417.	Limited Contribution - function in preventing northward spread of Gloucester, defined by Horsbere Brook, but already significant intrusion north of this boundary to Mill Lane including residential, sports centre and school. A417 provides strong long term boundary to prevent encroachment.	Limited Contribution - forms part of the north-eastern edge to Gloucester, but not key to its setting.	Variable strength of southern edge, initially defined by Horsbere Brook and associated tree line, but intrusion between this and Mill Lane weakens its integrity. Land to the north of Mill Lane is comprised of large agricultural and playing fields with relatively weak boundary features. The A417 to the north forms a very strong long term boundary as does the A46 to the east. As such, the Green Belt function of this parcel is compromised	Limited Contribution
SE8 - land to the south of the A417, west of Brockworth Road east of Valiant Way.		Contribution - prevents some northward sprawl from Brockworth, although A417 forms a stronger northern edge than Horsbere Brook and tree- line to the south of the segment.	Limited Contribution - arguably part of the wider belt of land separating Cheltenham and Gloucester, although limited connection with main extent of land due to severance by the strong boundary of the A417.	Limited contribution - northern edge to Gloucester poorly defined by Horsbere Brook. A417 provides strong long term boundary to prevent encroachment.	Limited Contribution - scale of segment limits contribution to the setting of Gloucester.	Horsbere Brook and associated planting defines the urban edge of Brockworth forming a boundary, but not a particularly strong one. The edge between Valiant Way and westerly extent of Brockworth is weak. The overall Green Belt function of this segment is relatively limited and therefore it merits further consideration should land be required for release from the Green Belt for development and should other elements of the evidence base suggest that it is appropriate. The A417 forms a strong long term boundary to prevent encroachment.	Limited Contribution
SE9 - land to the south of the A417, east of the M5, and west of Valiant Way and north of Delta Way.		Contribution - part of the northern edge to Gloucester preventing sprawl, although limited opportunity for ribbon development due to nature of surrounding road infrastructure.	Limited Contribution - limited connection with main extent of Green Belt due to severance by the A417 and motorway junction.	Limited Contribution - encroachment containment by A417, M5, Valiant Way and Delta Way.	Limited Contribution -separated from Gloucester by dominant feature of the M5.	Effectively remnant land from the development of the junction between the M5 and the A417, comprising one large field and peripheral scrubland. As such, notwithstanding the strong boundaries formed by Delta Way to the south and Valiant Way to the east, the Green Belt function of this land is limited by its size and isolation from adjacent segments.	Limited Contribution
SE10 - land immediately to the west of Grovefield Way, bounded by the Cheltenham-Gloucester railway line to the south, the M5 to the west, and the A40 to the north.		Significant Contribution - forms the western edge to Cheltenham at Grovefield Way preventing further ribbon development/sprawl westwards along the A40, although there has already been ribbon development along the Reddings and the A40 corridor.	Significant Contribution - important part of the strategic gap between Cheltenham and Gloucester at a very narrow point.	Significant Contribution - important part of the westerly edge of Cheltenham preventing encroachment which would significantly narrow the gap between the towns. Relatively strong boundary at Grovefield Way although some encroachment at the Reddings.	Significant Contribution - provides context for Cheltenham, and views from the west into Cheltenham.	A complex (structurally and in land use) area defined by the strong boundaries of the Cheltenham-Gloucester railway to the south, A40 to the north and M5 to the west. The land, despite some significant compromises to its openness to the east of its extent (principally associated with linear development at The Reddings), nevertheless plays a critical role in the separation of Cheltenham and Gloucester, particularly at this point where the Green Belt is at its narrowest. It plays a role in preventing ribbon development along the A40 corridor.	Significant Contribution
SW1 - land between Gloucester and Churchdown bounded by the M5 to the south-east, A417 to the south-west and the Cheltenham-Gloucester railway line to the north-west.	Key Wildlife Site (part) (Special Landscape Area)	Significant Contribution - with the A417 as its clear southern boundary and northern edge to Gloucester, this segment forms a critical role in preventing ribbon development around Churchdown.	Significant Contribution - integral part of land separating Churchdown and Gloucester, which if developed would significantly narrow the gap.	Significant Contribution - integral to preventing spread of Gloucester and Churchdown into this open land. No strong boundaries within the segment to prevent encroachment longer term.	Significant Contribution -integral to maintaining the northern extent of Gloucester and its identity. Views of Gloucester from Churchdown Hill.	This segment forms a fundamental part of the Green Belt separating Cheltenham and Gloucester, largely comprised of mixed farmland and woodland, with strong field boundaries. Centred on Churchdown Hill, this segment has a strong character and sense of openness. This segment is important for maintaining the wider A40 corridor of Green Belt and there are few strong boundary options to prevent encroachment.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land the built-up area; degree of enclo visual connection to historic urba relationship to the countryside)
SW2 - land to the east of Churchdown, bounded by the M5 to the east and Brockworth Road to the south.		Significant Contribution - prevents eastward sprawl from Churchdown and ribbon development along Brockworth Road.	Significant Contribution - helps to protect open land between Cheltenham and Gloucester at this relatively narrow point.	Limited Contribution - prevents eastward expansion of Churchdown into open countryside with clear boundaries. Strong boundary with M5 to prevent longer term encroachment.	Significant Contribution - the buffer between Churchdown and the M5 forms an integral part of the protection of the setting of Churchdown Hill and thence to the edge of Gloucester (as defined by the A417).	Forming an extension to segment SW1, being pastureland with well-defined hede extension of Churchdown is fundamenta Cheltenham and Gloucester at this point
SW3 - land to the east of Churchdown, bounded by the M5 to the west and Cheltenham-Gloucester railway line to the north.		Significant Contribution - prevents north-eastward sprawl from Churchdown although further ribbon development along Brockfield Road is unlikely due to proximity of M5.	Significant Contribution - prevents closure of narrow gap between Churchdown and Cheltenham.	Limited Contribution - prevents eastward expansion of Churchdown into open countryside with clear boundaries. Strong boundary with M5 prevents longer term encroachment.	Contribution - provides the setting for Churchdown.	A remnant of open countryside with stro connection to the wider countryside. Ho as pasture land and sport and recreatior adjoining segments, makes a significant Belt between Cheltenham and Glouceste between the settlements at one of the na
SW4 - land to the north-east of Churchdown bounded by the M5 to the east, Cheltenham-Gloucester railway line to the south and A40 to the north.		Significant Contribution - prevents north-eastward expansion of Churchdown along Parton Road, Station Road and in the A40 corridor. And in the A40 corridor.	Significant Contribution - prevents closure of narrow gap between Churchdown and Cheltenham.	Significant Contribution - protects open land between Churchdown and Cheltenham. Limited urbanising uses and few strong boundaries to contain development within segment.	Contribution - provides the setting for Churchdown.	The strong boundaries of the A40, M5 ar which forms an integral part of the strate Churchdown. The land is in mixed agric and open character. This area is critical protecting the openness of the A40 corri
SW5 - land between Gloucester and Churchdown bounded by the Cheltenham-Gloucester railway line to the south, A40 to the north and A40 to the west.		Significant Contribution - forms the northeast boundary of Gloucester, defined by the A417. Prevents sprawl south- westwards from Churchdown and ribbon development along southern edge of Pirton Lane and the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Gloucester and then Cheltenham.	Limited Contribution - prevents the south-westerly expansion of Churchdown into open countryside through relatively strong boundaries.	Contribution - provides the setting for Churchdown and Gloucester.	In mixed agricultural use with strong field segment SW1) forms a crucial part of the Gloucester, and in turn between Chelter definition (A40, A417, railway). Importan A40 corridor.
NW1 - land between Cheltenham and Churchdown, lying immediately to the west of the M5 and east of Gloucestershire Airport.		Significant Contribution - part of the open land between Churchdown and Cheltenham preventing sprawl from airport related uses and employment uses to the north and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Cheltenham at this narrow part of the gap.	Contribution – part of a number of segments preventing urban encroachment into open land between Cheltenham and Churchdown, although significant urbanisation to west at Airport. M5 would form strong boundary to east, but segment is divorced from urban area.	Limited Contribution - due to location between M5 and Airport.	Defined by the perimeter of the airport a pastoral use with well-defined field boun airport and the M5, but has an open cou part of the relatively narrow gap between openness along the A40 corridor.
NW2 - land between Cheltenham and Churchdown forming Gloucestershire Airport, defined by the A40 to the south, B4063 Cheltenham Road to the north and Norman's Brook to the south-west.		Significant Contribution - part of the open land between Churchdown and Cheltenham preventing sprawl from airport and employment uses to the north and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Gloucester at this narrow part of the gap.	Contribution - although the airport buildings give this an urban feel, the runway is open and the strong boundaries prevent further encroachment.	Limited Contribution - due to distance from historic centres, although it helps to provide the setting for Churchdown.	Although the majority of this segment is are hard runways and associated periph urbanised feel. However, overall the lan distant views towards Churchdown and Cotswold escarpment to the east (partic an important role in the separation of the Green Belt.
NW3 - land immediately to the east of Churchdown defined by the A40 to the south, Norman's Brook to the north-east and the B4063 Cheltenham Road to the north.		Significant Contribution - forms a strong boundary to prevent eastward sprawl of Churchdown and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Cheltenham at this narrow part of the gap.	Limited Contribution - this land is of open character and strong boundaries prevent encroachment.	Limited Contribution - helps to provide the setting for Churchdown and beyond but is distant from the historic centres.	With segments NW1 and NW2, this is pa and Cheltenham providing clear separat contribution of this segment to maintaini this narrow point.



g land use; proximity and relationship to f enclosure/openness; distance and 'ic urban centres/key urban areas; side)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
nt SW1, this land is distinctly open in character, ned hedgerows. Its role in preventing the eastward damental, in turn contributing to the separation of his point where the Green Belt is relatively narrow.	Significant Contribution
with strongly defined boundaries which limit its side. However, it retains its openness through use ecreation, and therefore, in combination with gnificant contribution to the integrity of the Green Bloucester and in particular to the separation of the narrowest points of the Green Belt.	Significant Contribution
0, M5 and the railway create a coherent segment ne strategic gap between Cheltenham and red agricultural use, with strong field boundaries s critical to the separation of the settlements and 40 corridor.	Significant Contribution
rong field boundaries, this segment (along with art of the separation between Churchdown and Cheltenham and Gloucester. Strong boundary Important contribution to maintaining openness of	Significant Contribution
airport and a minor road, this segment is under eld boundaries. It is a remnant land between the pen countryside character which is an essential between Cheltenham and Churchdown and r.	Significant contribution
ment is open land given over to airport uses, there d peripheral hangars which give it a more II the land is considered to be open, providing wn and Churchdown Hill to the south and the st (particularly from Bamfurlong Lane). This plays on of the settlements at this narrow point in the	Significant contribution
this is part of the open land between Churchdown separation between the settlements. The naintaining the openness as a whole is critical at	Significant contribution

Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
NW4 - land between Innsworth and Gloucester bounded by the A40 to the south and west and built development immediately to the north and east.	Flood Plain (part)	Significant Contribution - prevents westward sprawl from Churchdown and ribbon development along Cheltenham Road East.	Significant Contribution - part of the separation between Gloucester and Churchdown (and thus Cheltenham) at this narrow part of the gap, although there is built development to the north, east and west.	Limited Contribution - land is enclosed on two sides although is linked to the open countryside to the south (segments SW5 and SW1) across the A40. Strong boundaries to contain encroachment.	Limited Contribution - parcel too small to be part of a setting for either Gloucester or Innsworth.	This segment comprises two relatively small parcels of land in mixed agricultural use with limited internal field boundaries. This is part of the land separating Gloucester and Cheltenham, although this segment is enclosed on two sides by urban development and the substantial barrier of the A40 on the other two sides, isolating it from the more substantial tract of Green Belt to the South East (segments SW5 and SW1). It plays an important role in separating the settlements at this point where the gap is narrow.	Significant Contribution
NW5 - land to the north of the A40 and west of the A38, defined by Hatherley Brook to the north and Dry Meadow Lane to the east.	Flood Plain (part)	Limited Contribution - limited opportunities for ribbon development.	Limited Contribution - maintains the separation of Gloucester and Innsworth, but does not play a role in preventing merger of Gloucester and Cheltenham.	Limited Contribution - prevents some encroachment of Longford into open countryside, but clear boundary of A38 and Hatherley Brook to contain development. Already urbanising uses/ encroachment.	Limited Contribution - no visual connection with Gloucester.	An open, predominantly pastoral landscape with large fields and strong field boundaries. A significant part of this segment is flood plain. The overall contribution of this segment to Green Belt purposes is limited to containing the westward expansion of Innsworth and northward expansion of Longworth, with a relatively limited strategic function. It plays no role in separation of the settlements and has strong boundaries that could contain development.	Limited Contribution
NW6 - land immediately to the west of Innsworth, defined by Hatherley Brook to the north, Dry Meadow Lane to the west, Innsworth Lane to the south and Frog Furlong Lane to the east.	Flood Plain (part) Key Wildlife Site (part) with co-extensive SSSI	Limited Contribution - Innsworth contained within well-defined road boundaries, with limited opportunities for ribbon development.	Limited Contribution - land forms the westerly extent of Innsworth, so would not bring Gloucester and Cheltenham closer together.	Limited Contribution - prevents some encroachment of Innsworth into open countryside, but there has already been encroachment. Strong boundary of Hatherley Brook to contain development.	Limited Contribution - no visual connection with Gloucester.	An intensively farmed, predominantly arable landscape of medium-sized fields and reasonably strong field boundaries. This is an open landscape which is clearly of a definite character and with the clearly defined urban edges of Innsworth Lane and Frog Furlong Lane is the start of open countryside. However, the overall contribution to Green Belt function is limited to containing Innsworth with a minimal wider strategic function. Plays no role in separation of the settlements. The strong boundary of the Hatherley Brook prevents encroachment.	Limited Contribution
NW7 - land to the north of Innsworth, defined by the indistinct urban edge of Innsworth, Hatherley Brook to the north and Cheltenham Road to the south- east.		Significant Contribution - prevents the northward and eastward sprawl of Innsworth and ribbon development along Cheltenham Road East.	Significant Contribution - part of the land separating Cheltenham and Innsworth/ Churchdown at a narrow point. Eastern part of the segment plays a particular role in this.	Limited Contribution - prevents the encroachment of Innsworth/ Churchdown into open countryside. The Hatherley Brook forms a strong boundary.	Contribution - provides the setting for Innsworth/ Churchdown, although views from Down Hatherley Lane are limited by mature hedgerows in a flat topography.	A landscape dominated by golf links (Brockhampton Court Golf Complex) forming an important open landscape setting to Innsworth/Churchdown. This segment is closely related to NW8 immediately to the north which has a golf links use on its eastern extent. Plays a key role in separation of the settlements at the narrowest part of the Green Belt along the A40 corridor.	Significant Contribution
NW8 - land to the north and west of Innsworth bounded by Hatherley Brook to the south, Down Hatherley Lane to the north, Brook Lane to the west and Cheltenham Road to the east.		Significant Contribution - prevents ribbon development along Down Hatherley Lane.	Significant Contribution - part of the land separating Cheltenham and Innsworth/Churchdown, particularly the eastern part of this segment.	Significant Contribution - prevents the encroachment of Innsworth/Churchdown/ employment uses to east into open countryside. Although there are strong boundaries, the segment is divorced from the urban edge.	Contribution - provides the setting for Innsworth/ Churchdown.	Open countryside with some urbanised elements (residential development to the west along Ash Lane). The land is in mixed agricultural use with strong field boundaries. It plays a role in separation of the settlements at the narrowest part of the Green Belt along the A40 corridor.	Significant Contribution
NW9 - land immediately to east of the A38 bounded by Hatherley Brook to the south-west and Brook Lane to the north-east.	Flood Plain (part)	Contribution - part of land preventing the sprawl of Twigworth and further ribbon development along the A38.	Limited Contribution - forms the westerly extent of Green Belt and does not form part of the separation between Cheltenham and Gloucester.	Limited Contribution due to clear long term boundaries, the A38 and Down Hatherley Lane.	Limited Contribution - no visual connection with Gloucester.	Open countryside in mixed agricultural use with predominantly large fields and poorly defined field boundaries. Some significant intrusion (large caravan park) at Twigworth which compromises the sense of openness. Strong boundaries combined with urbanising influences and no role in preventing separation of Gloucester and Cheltenham.	Limited Contribution
NW10 - land to the north-west of Cheltenham and north of Innsworth/Churchdown bounded by the A38 to the west, A4109 to the north. M5 to the west and Down Hatherley Lane/Cheltenham Road to the south.	(Landscape Protection Zone - part)	Contribution - prevents ribbon development associated with smaller settlements and along A38, but does not immediately adjoin built-up area.	Significant Contribution - forms an integral part of land separating Cheltenham and Innsworth, particularly the southern part of the segment.	Significant Contribution - there are few strong boundaries and the segment is divorced from the urban edge.	Limited Contribution - land is relatively remote from Gloucester and Cheltenham.	An extensive area of open countryside forming the north-western extent of Green Belt being of mixed agricultural use, with various small villages scattered throughout. Although this segment has strong outer boundaries, there are few strong boundaries within it and it is divorced from the urban edge. It plays an important role in the separation of Cheltenham and Gloucester, particularly the southern part of the segment.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
NW11 - land bounded by the B4364, B4063 lying immediately to the west of the M5.		Significant Contribution - prevents sprawl from employment related/airport related uses to the south and ribbon development along the B4063.	Significant Contribution - part of the land separating Cheltenham and Innsworth at a very narrow point.	Significant Contribution - there are strong boundaries, but the segment is divorced from the urban edge.	Limited Contribution - land is relatively remote from Innsworth and Cheltenham.	This small parcel of grazing land is related to in character, but not part of, land lying to the north-west, well defined by the M5. Of relatively fine-grained field pattern and well-defined field boundaries, this segment makes a significant contribution to openness of the countryside between Cheltenham and Churchdown/Innsworth. It plays a key role in separation of the towns at this narrow point.	Significant Contribution
NE1 - land to the west of the urban edge of Cheltenham, bounded by the M5, A40 and Bamfurlong Road to the north.		Significant Contribution - forming western boundary to Cheltenham and preventing sprawl westwards from Gloucester along Bamfurlong Lane.	Significant Contribution - part of the land separating Cheltenham and Innsworth at a narrow point.	Significant Contribution - there has already been encroachment in this area, and there are few clear boundary options.	Contribution - provides countryside setting for Cheltenham.	This is a relatively heavily urbanised area mixed with agricultural land with strong hedgerow and treed boundaries, helping to maintain its open countryside character. It plays a key role in maintaining the separation between Cheltenham and Gloucester at this narrow point.	Significant Contribution
NE2 - land to the west of the urban edge of Cheltenham, bounded by the M5 to the west, B4063 to the north and Bamfurlong Road to the south.		Significant Contribution - forming western boundary to Cheltenham and preventing ribbon development along Bamfurlong Lane.	Significant Contribution - part of the land separating Cheltenham and Innsworth at a narrow point.	Significant Contribution - lew boundary options and land is divorced from urban edge.	Contribution - western part of segment provides countryside setting for Cheltenham.	Despite some significant urbanisation, this segment consists of intensively farmed, large scale arable fields characterised by open vistas. This is clearly an 'urban fringe' landscape which is part of the countryside edge to Cheltenham, and is clearly defined by the road network but with few boundary options. It plays an important role in the separation of Cheltenham and Gloucester.	Significant Contribution
NE3 - land bounded by the B4063 to the south and Pheasant Lane to the north.		Significant Contribution - forming western boundary to Cheltenham and preventing its westward sprawl along the B4063 and Pheasant Lane.	Significant Contribution - part of the land separating Cheltenham and Innsworth at a narrow point.	Significant Contribution - limited suitable boundary options to prevent longer term encroachment.	Contribution - provides countryside setting for Cheltenham.	A 'remnant' agricultural landscape characterised by small-scale, irregular fields with boundary hedges in variable condition. Along with adjacent segments, this land forms a fundamental part of the definition of the western edge of Cheltenham, although there is intrusion from urbanising influences such as a mobile home park. This plays a key role in separation of Gloucester and Cheltenham and has limited boundary options.	Significant Contribution
NE4 - land immediately to the west of Cheltenham, bounded by Fiddler's Green Lane to the east, Pheasant Lane/B4063 to the south, Hayden Lane to the west and the B4634 to the north.	Key Wildlife Site (part)	Significant Contribution - forming western boundary to Cheltenham preventing its westward sprawl.	Significant Contribution - part of the land separating Cheltenham and Innsworth.	Significant Contribution - few boundary options within segment.	Contribution - provides countryside setting for Cheltenham.	This segment contains the western edge of Cheltenham, with a strong boundary road features to the south (Fiddler's Green Lane, Springbank Road and Henley Road) with less clear definition to the north. This land forms a fundamental part of the definition of the western edge of Cheltenham. It is characterised by large fields, pasture to the south, arable to the north with expansive views. It plays a key role in the separation of Cheltenham and Gloucester. There are few boundary options within this segment to prevent long term encroachment.	Significant Contribution
NE5 - land bounded by the B4634 to the north, Hayden Lane to the east, the B4-63 to the south and the M5 to the west.			Significant Contribution- part of the land separating Cheltenham and Innsworth.	Significant Contribution - there has been little encroachment with few urbanising influences. There are strong boundaries but they are divorced from the urban edge.	Contribution - provides countryside setting for Cheltenham.	Part of the land containing, and giving context to, the western fringes of Cheltenham, characterised by large, intensively farmed arable fields, with expansive views. This land forms a partner (in character and function) to adjacent segments to the east, north and south. It plays a key role in separation between Cheltenham and Gloucester and the openness of the A40 corridor.	Significant Contribution
NE6 - land immediately to the north- west of Cheltenham, bounded by B4634 to the south, Withybridge Lane to the west, and the A4019 to the north.		Significant Contribution - forming western boundary to Cheltenham preventing ribbon development along the B4634and A4019.	Significant Contribution - land forms part of the westerly extent of the Green Belt, but the South western part of this segment is key in preventing separation in the wider A40 corridor.	Significant Contribution - no strong boundaries to prevent longer term encroachment.	Contribution - provides countryside setting for Cheltenham.	Land forming the north-west edge of Cheltenham with a complex field pattern in mixed arable and pastoral uses, and of an open character, with relatively weak internal boundaries. In combination with segment NE4, the land forms a definite edge to the urban area lying immediately to the east. Key role in preventing encroachment. There are weak boundary options and increasingly to the southwest the segment plays an important role in the separation between Cheltenham and Gloucester.	Significant Contribution
NE7 - land bounded by the M5 to the west, the A4019 to the north, Withybridge Lane to the east, and the B4634 to the south.		Significant Contribution - part of the western boundary of Cheltenham, but not immediately adjacent to built-up area. Prevents ribbon development along Old Gloucester Road and A4019.	Significant Contribution - land forms part of the westerly extent of the Green Belt, and to the south plays an important role in maintaining separation.	Significant Contribution - there is no encroachment in this area and very few urbanising influences. There are strong boundaries, but the segment is divorced from the urban edge.	Contribution - part of the context for the western fringe of Cheltenham.	A remoter segment characterised by large-scale arable fields and poorly defined boundaries giving expansive views. With segment NE6, this land forms an important part of the westerly context of Cheltenham and with the south part of segment NW10, this forms an important part of the context of the land separating Cheltenham and Innsworth, and is divorced from the urban edge.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land the built-up area; degree of enclo visual connection to historic urba relationship to the countryside)
NE8 - land to the north of Cheltenham bounded by the A4019 to the south, The Green to the west, and the River Swilgate to the north-east.		Limited Contribution - forms part of the northern boundary of Cheltenham, although significant ribbon development in this southern area.	Limited Contribution - does not perform a separation function between Cheltenham and Bishop's Cleeve or between Cheltenham and Gloucester.	Contribution - part of the buffer between Cheltenham and wider countryside to the north-west although significant urbanising influences to the south of this segment. The boundaries are weak.	Contribution - part of the setting for Cheltenham.	A tract of land which forms a broader co use is predominantly arable with highly v strong hedgerow boundaries. Substanti boundary of the segment, creating a stro- development along the A4019 comprom southern part of this segment. This segu Cheltenham and Bishop's Cleeve or Che development would need to create stron- form.
NE9 - land to the north-west of Cheltenham, bounded by the A4019 to the south, M5 to the west, and the Uckington-Hardwicke Road to the east and north.		Significant Contribution - part of open countryside. Limits ribbon development along the A4019.	Limited Contribution - forms north-westerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. There is little encroachment and few urbanising influences. The boundary options are weak in this segment.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the by intensive arable uses and extensive v segments (NE10 and NE11). This segm Cheltenham and Bishop's Cleeve or Che further ribbon development to the M5 an prevent encroachment.
NE10 - land to the north-west of Cheltenham, bounded by the Elmstone- Hardwicke to Hardwicke Road to the south, M5 to the west and Hyde Brook to the north-east.		Contribution - part of open countryside, but no significant role in preventing ribbon development. Limited existing ribbon development and does not adjoin built-up area.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. Boundary options are weak.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the by intensive arable uses and extensive segments (NE9 and NE11). It does not Bishop's Cleeve or Cheltenham and Glo development to the M5 and has few stro encroachment.
NE11 - land to the north of Cheltenham bounded by Stoke Road to the north, the River Swilgate to the west Road to the north by the Birmingham-Bristol railway to the east and a track to the south.	Key Wildlife Site (part)	Contribution - part of open countryside preventing ribbon development south of Stoke Road.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north. No strong internal boundaries to prevent encroachment. Some urbanising uses but no significant encroachment.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the by intensive arable and some urban fring and sizes. This land complements adjac not make a significant contribution to any further ribbon development to the M5 and prevent encroachment.
NE12 - land to the north-west of Cheltenham, immediately to the east of Elmstone Hardwicke bounded by The Green and Lowdilow Lane to the west and an unmade track to the east.		Limited Contribution - part of open countryside. Not adjacent to built-up area so limited ribbon development opportunities.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. There are some urbanising uses but no significant encroachment. This segment is divorced from the urban edge.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the by intensive arable uses and extensive segments (NE9, NE10 and NE11). This of settlements.
NE13 - land immediately to the north of Cheltenham bounded by Dog Bark Lane to the west, an un-named land- drain to the north-east, Lowdilow Lane to the north-west, and Swindon to the south-east.		Limited Contribution - part of open countryside preventing ribbon development from Swindon.	Limited Contribution - does not perform a separation function between Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Contribution - forms the northern boundary of Cheltenham preventing encroachment. Relatively weak boundaries within segment. Stronger boundaries would contain development.	Limited Contribution - no visual connection to Cheltenham.	Land which has a weak urban edge at the arable landscape with relatively poor inte development here would need to create urban form. Does not play a role in sepa Cleeve or Cheltenham and Gloucester.



nd use; proximity and relationship to iclosure/openness; distance and urban centres/key urban areas; e)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
r context for Cheltenham as a whole. Land hly variable field sizes and patterns, with tantial retail uses abut the south-eastern strongly urbanised feel. Significant ribbon romises the sense of openness of the segment does not play a role in separating Cheltenham and Gloucester. Any trong boundaries with well planned urban	Limited Contribution
o the north-west of Cheltenham characterised ive views. This land complements adjacent segment does not play a role in separating Cheltenham and Gloucester but prevents 5 and has few strong internal boundaries to	Contribution
o the north-west of Cheltenham characterised ive views. This land complements adjacent not play a role in separating Cheltenham and Gloucester but prevents further ribbon strong internal boundaries to prevent	Contribution
o the north-west of Cheltenham characterised fringe land uses, with variable field patterns adjacent segments (NE10 and NE14). It does o any of the Green Belt purposes but prevents 5 and has few strong internal boundaries to	Contribution
to the north-west of Cheltenham characterised isive views. This land complements adjacent This does not play any role in the separation	Contribution
at this location. It is an irregularly structured r internal boundary definition. Any eate strong boundaries through well planned separation of Cheltenham and Bishop's ter.	Limited Contribution

Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
NE14 - land to the west of Brockhampton, between the railway line to the east and an unnamed land-drain to the south. To the north is the track around the quarry site.		Contribution - part of open countryside. Limited role in preventing sprawl/ribbon development as segment is not adjacent to built-up area.	Significant Contribution - part of the land separating Cheltenham and Bishop's Cleeve.	Contribution - part of the buffer between Cheltenham and wider countryside to the north preventing encroachment. The internal boundaries are weak.	Limited Contribution - no visual connection to Cheltenham.	Land which forms part of the important separation of Cheltenham and Bishop's Cleeve. Quarry and landfill uses to the north-east.	Significant Contribution
NE15 - land between Brockhampton Lane and the Birmingham-Bristol railway, immediately to the north of Swindon.		Contribution - part of open countryside preventing sprawl from south-west, although relatively weak boundaries here.	Significant Contribution - part of the land separating Cheltenham and Bishop's Cleeve at a narrow point.	Significant Contribution - forms the northern boundary of Cheltenham preventing encroachment. The boundaries are relatively weak in places and there are few urbanising influences.	Limited Contribution - no visual connection to Cheltenham.	Land which forms part of the separation of Cheltenham and Bishop's Cleeve at its narrowest point.	Significant Contribution
NE16 - land lying to the south-west of Bishops Cleeve bounded by the Birmingham-Bristol railway to the west railway to the west, Stoke Road to the north, the A435 to the east and Hyde Brook to the south.		Significant Contribution - forms the south-western boundary of Bishop's Cleeve, preventing sprawl around Brockhampton and south-west Bishop's Cleeveto Stoke Orchard.	Significant Contribution - forms a significant part of the open land between Cheltenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing westward expansion of Bishop's Cleeve. There are few strong boundaries.	Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, dominated by arable farming but with significant quarrying activity to the north. Medium-sized fields with strong field boundaries. Prevents the westward expansion of Bishop's Cleeve and ribbon development. The boundary options to prevent encroachment are weak.	Significant Contribution
NE17 - land bounded by Hyde Brook to the north, the Birmingham-Bristol railway to the west and Hyde Lane to the south-east.		Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve.Prevents ribbon development around Brockhampton and east of Swindon	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve at a narrow point.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing encroachment south-west from Bishop's Cleeve. Few strong boundary options.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of the setting of the settlement.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve at one of the narrowest points, closely related to the character of segment NE18.	Significant Contribution
NE18 - land immediately to the north of Cheltenham, bounded by the Cheltenham-Honeybourne railway to the west, Hyde Lane to the north, the A435 to the east and Swindon Lane to the south.		Significant Contribution - forms the northern boundary of Cheltenham preventing further development on the southern side of Swindon Lane and ribbon development along the A435.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing encroachment of Cheltenham northwards and Bishop's Cleeve south-eastwards Along the A435. There are few clear boundary options.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of the setting of the settlement.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve. If this area was developed the two would join up. An extensive arable landscape with poor field boundary definition giving a strongly open aspect, particularly when viewed from the higher ground where the A435 crosses the railway line. Swindon Lane forms a clear urban edge the north of Cheltenham.	Significant Contribution
NE19 - land lying immediately to the south of Bishop's Cleeve, bounded by the A435 to the west, by the Cheltenham-Honeybourne railway to the east and the variable urban edge of Bishop's Cleeve to the north.		Significant Contribution - forms the southern boundary of Bishop's Cleeve preventing sprawl southwards around Read Way and Crown Drive and ribbon development along the A435.	Significant Contribution - forms part of the main area of open land between Cheltenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing encroachment of Bishop's Cleeve southwards. Limited boundary options.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of the setting of the settlement and the racecourse.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, characterised by pastoral land use with variable boundary definition, and openness allowing extensive views to the AONB to the east. Prevents southern expansion of Bishop's Cleeve and merging of settlements at this narrow point. There are limited boundary options.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
NE20 - land lying immediately to the south of Bishop's Cleeve, bounded by the Cheltenham-Honeybourne railway to the west, variable boundaries to the east, and Southam Lane to the south.	(Special Landscape Area - part)	Significant Contribution - forms the southern boundary of Bishop's Cleeve preventing sprawl along New Road and Gambles Lane and around Southam.	Significant Contribution - forms part of the gap between Cheltenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing encroachment of Bishop's Cleeve southwards. Few long term strong boundary options. There are some urbanising influences, but the majority of the land is open.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of setting of Cheltenham.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, akin to segment NE16 characterised by pastoral land use with variable boundary definition, and openness allowing extensive views to the AONB to the east. Prevents the southern expansion of Bishop's Cleeve. There are few strong boundary options.	Significant Contribution
NE21 - land lying between Bishop's Cleeve and Cheltenham, bounded by the Cheltenham-Honeybourne railway to the west, Southam Lane to the north, the B4632 to the east and Hyde Brook to the south.	(Special Landscape Area - part)	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing sprawl to south and east of Southam, in particular preventing further ribbon development along Southam Lane.	Significant Contribution - forms part of the gap between Cheltenham and Bishop's Cleeve.	Significant Contribution - there are urbanising influences around Southam, but generally the segment is open with no significant encroachment. Strong boundary options but divorced from urban edge.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of its setting and setting to the racecourse.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, akin to segments NE19 and NE20, but with relatively uniform field pattern and characterised by mixed agricultural land use with variable boundary definition, and openness allowing extensive views to the AONB to the east and the racecourse to the south. Segment is divorced from urban edge.	Significant Contribution
NE22 - land lying immediately to the north of Cheltenham, bounded by the A435 to the west, the Cheltenham- Honeybourne railway to the north-west, Hyde Brook to the north-east, the B4632 to the east and the variable urban edge of Cheltenham to the south.		Significant Contribution - forms the northern boundary of Cheltenham preventing sprawl along the A435, although there are strong urbanising influences around the racecourse and around Prestbury village where there is a lot of ribbon development.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve.	Significant Contribution - prevents the northward encroachment of Cheltenham into open countryside. The northern part of this segment is open, but there are significant urbanising uses associated with this. There are few strong boundary optionsracecourse and around Prestbury village.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of the setting of Cheltenham.	Much of land is used as a racecourse and extending to Prestbury village in the east, characterised by disruption of openness caused by the buildings and features associated with racing activities, but nevertheless a critical part of the land separating Cheltenham and Bishop's Cleeve and checking the northward expansion of Cheltenham and sprawl along the A435. There are few strong boundary options to contain encroachment in the longer term.	Significant Contribution





# Appendix E Comparison with Results of Previous Green Belt Reviews





#### Table E.1 A Comparison between the Evaluation of the SWRA (Joint Study Area), AERC and AMEC Green Belt Studies

Note: Colour coding changed to be consistent with that used in AMEC report for ease of reference

Please see section 5.5 of main report regarding general differences in results. Direct comparison of results is not possible due to different study areas and different study remits.

SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores	
Land between Cheltenham	Second least harm			Table 5.2 Recommendation:	A5, A9	Lowest Scores	4.8.1 The majority of the sub areas	
and Bishop's Cleeve	4.3.3 The principal aims of the Cheltenham and Gloucester Green Belt is to protect Cheltenham and Gloucester and Cheltenham and	NE22	E22 Significant contribution	Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981).	A2, A3, A6, A8, A11	Average Scores	(including A4, A7, A10, G14, G19, G13, G12, G15, G18) that fall within this area received high scores and they make significant contributions towards purpose	
	Bishop's Cleeve from merging and to define a limit to urban sprawl. In				A4, A7, A10	Highest Scores	II, (prevent neighbouring towns from merging).	
	to define a limit to urban sprawl. In this connection the JSA has been able to identify a strategic area which, if lost, would fundamentally	this connection the JSA has been able to identify a strategic area	his connection the JSA has been able to identify a strategic area	Significant contribution		A1, A10	Highest Scores	Exec Summary 13. The results of the objective scoring process showed that the area between Cheltenham and Bishop's
	undermine the purpose of the Green Belt in respect of preventing Cheltenham coalescing with	NE18 Signif	Significant		G17	Average Score	Cleeve generally contributes more to achieving Green Belt purposes than other areas.	
	Cheltenham coalescing with Gloucester. No such similar conclusion is available in respect of Cheltenham and Bishop's Cleeve. Score 3 out of 5 in JSA work (where 1 is least important and 5 is most important)	Green Belt in respect of preventing Cheltenham coalescing with Gloucester. No such similar conclusion is available in respect of Cheltenham and Bishop's Cleeve. Score 3 out of 5 in JSA work (where 1 is least important and 5 is		contribution		G10, G11, G12, G13, G14, G15, G16, G18, G19	Highest Scores	The AMEC assessment and AERC scores are broadly consistent, although AERC considered much smaller parcels of land which accounts for some of the differences in areas immediately adjoining the urban area near Cheltenham Racecourse and Prestbury. The JSA work did not place as much emphasis on the importance of this land in relation to the purpose of Green Belt designation (as extended in 1981) to maintain separation between Cheltenham and Bishop's Cleeve.



SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
		NE15	Significant Contribution		G2	Average Score	The AMEC report sees this area as critical to the separation of Cheltenham and Bishop's Cleeve
		NE14	Significant Contribution		G1	Average Score	Same assessment
Land to the north west of	Least harm		I factoria	Table 5.2 Recommendation:	G4, G6, G7, G8	Lowest Scores	4.8.1 The sub areas to the west and north-west (including sub areas G4, 6 and
Cheltenham	(No narrative justification - only scoring [1 out of 5])	NE13	Limited Contribution	Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side	G5	Highest Score	7 scored 'Low' because they do not play a role fulfilling the purpose II, preventing
		NE8	Limited Contribution	of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards the west both segments increasingly share characteristics and functions of the outer segments of the Green Belt and therefore merit further consideration for possible release should the land be required.	G9	Average Score	neighbouring towns from merging. As this is the perceived most important Green Belt purpose, a low score on this significantly reduced these sub areas overall score. Additionally, the results of the analysis show these sub areas do little in assisting in safeguarding the countryside from encroachment (purpose III). JSA and AMEC assessment similar. AERC similar score for majority of area but some difference in relation to AERC G5 and G9. Difference could be due to smaller parcels considered in AERC report as opposed to more strategic parcels in AMEC assessment.
		NE6	Significant Contribution	This parcel is seen as critical to preventing the sprawl of Cheltenham.	F1	Average Score	Difference in assessment/score likely to relate to methodology and AMEC parcels being much larger, with AERC parcels only covering the area immediately adjoining the urban edge
			Significant	This parcel is seen as critical to preventing the merging of Cheltenham	F5, F6, F7, F10	Lowest Scores	As Above



SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
			Contribution	and Churchdown at a narrow point.			
		NE4			F8, F9, F11	Average Scores	As Above
Land to the west of Cheltenham	Second least harm (No narrative justification - only	NE3	Significant Contribution	Table 5.2 Recommendation: Critical to preventing the sprawl of	F12, F14	Average Scores	Exec Summary 13. Sub-areas to the north-west and west of Cheltenham scored lowest against Green Belt
	scoring [4 out of 5])	NE2	Significant Contribution	Cheltenham and towards the south the merger of Cheltenham and Churchdown.	F13	Average Scores	AMEC report considers these parcels to be key to preventing merger between
	Ν	NE1	Significant Contribution		F15	Average Scores	Cheltenham and Churchdown at this narrow point in the Green Belt.
		SE10	Significant Contribution		E1, E2, E3	Average Scores	This is a particularly narrow gap between Churchdown & Cheltenham, and AMEC therefore considers this to be key to the purpose of designation of the Green Belt
Land to the south-west of Cheltenham	Second least harm (No narrative justification - only scoring [3 out of 5])	SE5	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation.	E4, E5, E6	Average Scores	No AERC narrative. AMEC's SE5 is a very large parcel, and AERC's E4, E5 and E6 are very small parcels which already have quite an urban feel. This is therefore not a direct comparison.
North of Gloucester City Centre	Least harm (1 out of 5 in JSA work)	NW5, NW6, NW9	Limited Contribution	Table 5.2 Recommendation: The openness is compromised by intrusive development. Limited function in separation between settlements, so case for re-examining boundaries particularly in relation to Innsworth where existing boundary features could be used to create new long term boundaries.	NA	NA	Similar assessment/scoring between AMEC and JSA/SWRA work



SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
North east of Gloucester	Second least harm, although JSA work scores as most harm (No narrative justification - scoring [5 out of 5] in JSA work)	SW1, SW5	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.	NA	NA	Difference is that AMEC report considers this narrow gap between Gloucester and Churchdown as key to maintaining separation between Gloucester and Cheltenham. JSA and AMEC score similar, although SWRA considered that this land made less contribution to Green Belt purposes.
North of Brockworth	Third least harm (No narrative justification - scoring [5 out of 5] in JSA work)	SE7, SE8, SE9	Limited Contribution	Table 5.2 Recommendation: Whilst forming the immediate boundary to Gloucester, intrusion of urban uses compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re- examining its designation and boundaries. Segment SE9, in particular, because of its enclosure on all sides by major roads (and being one field) serves little or no Green Belt function.	NA	NA	Buchanan ranking of sensitivity of change score this differently from JSA work which scored this area highly for preventing towns merging. The AMEC report considers the severance from the Green Belt by the A417 and the role that this robust boundary could have in preventing further narrowing of the gap.
South of Cheltenham	No commentary, scored 4 out of 5 in JSA work	SE2, SE3	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re- definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.	NA	NA	Similar assessment/scoring.



# Appendix F Example Green Belt Policies

#### Tunbridge Wells Core Strategy (Adopted June 2010)

#### **Core Policy 2: Green Belt**

The boundaries of the Green Belt are defined on the adopted Proposals Map and are indicated on the Key Diagram at the end of this document.

- 1. The general extent of the Green Belt will be maintained for the Plan period.
- 2 A long-term land reserve (designated in this Plan as 'Rural Fringe') will be maintained to ensure that Green Belt boundaries will not need to be altered at the end of the Plan period.
- 3 There will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it. Any new development should accord with the national planning provisions of Planning Policy Guidance Note 2: *Green Belts* (PPG2) or its replacement.
- 4 Infill development and redevelopment within the designated 'Major Developed Sites' within the Green Belt will be allowed where it accords with the national planning provisions of PPG2 or its replacement.

#### The Function of the Green Belt

- **5.28** The Green Belt, sometimes referred to as the Metropolitan Green Belt, is a long-standing instrument of national and regional planning policy. The <u>Planning White Paper</u> (May 2007), which informed the Planning Act 2008, stated that "*the Government is committed to the principles of the Green Belt and will make no fundamental changes to the planning policy as set out in Planning Policy Guidance Note 2: Green Belts 1995 (PPG2).*"
- **5.29** The outer boundary of the Green Belt was defined by the Kent Countryside Plan 1983. The Tunbridge Wells Borough Local Plan 1996 reviewed the Green Belt boundaries of the previous area-based Local Plans for Royal Tunbridge Wells, Southborough and Paddock Wood, which defined the Green Belt boundary adjoining these settlements. The 1996 Local Plan also defined the inner boundaries for the remainder of the settlements within the Plan area covered by the Green Belt.
- **5.30** The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open and it follows that the most important characteristic of the Green Belt is its openness. Green Belts perform five key functions:
  - preventing urban sprawl;
  - preventing towns from merging into one another;
  - · safeguarding the countryside from encroachment;
  - · preserving the setting and character of historic towns; and
  - helping urban regeneration, by encouraging the recycling of under-used and outworn urban land and buildings.

#### **Green Belt Boundaries**

- 5.31 It remains the Borough Council's intention to maintain the general extent (i.e. its overall coverage) of the Green Belt in accordance with Government guidance that, once Green Belt boundaries have been established, they should be altered only exceptionally, to ensure that its primary functions of maintaining openness and preventing the coalescence of settlements are retained. Similarly, the emerging South East Plan confirms that there is strong public support for the concept of the Green Belt and that the functions of the Green Belt are entirely consistent with the spatial strategy for the region.
- **5.32** In terms of the detailed inner Green Belt boundaries around the settlements in the Borough, the emerging South East Plan states, in the supporting text to Policy AOSR8: Tonbridge/Tunbridge Wells Hub, that "there may be a likely need for small scale Green Belt review at *Tunbridge Wells*" in order to be able to accommodate sufficient development here to support its Regional Hub status (Secretary of State's Proposed Changes). This is capable of being an exceptional circumstance in which the boundaries could be reviewed (PPG2, paragraphs 2.6-2.7). Any review would be dependent on there being no suitable non-Green Belt sites available to support the requirements of the Regional Hub. The Borough Council would then consider the release of sites within the Green Belt that are contiguous with the Limits to Built Development (LBD) of Royal Tunbridge Wells and Southborough where this would least compromise the function of the Green Belt.
- **5.33** The Borough Council's <u>Strategic Housing Land Availability Assessment</u> (SHLAA) and <u>Annual Monitoring Report</u> (AMR) will help to monitor whether there are sufficient non-Green Belt sites to support the Regional Hub status. The first SHLAA, completed in early 2009, showed that Green Belt sites should not need to be released during the Plan period. In locations other than Royal Tunbridge Wells and



Southborough, no Green Belt sites will be allocated or released during the Plan period (see also Core Policy 9: Development in Royal Tunbridge Wells and Core Policy 10: Development in Southborough).

#### **Development in the Green Belt**

- 5.34 Within the Green Belt there will be a presumption against permitting new development, or changes of use of land or buildings, or engineering operations, other than those in accordance with PPG2, the Regional Spatial Strategy and other relevant policies contained within this Core Strategy and wider LDF. Paragraph 3.7 of PPG2 states that "with suitable safeguards, the re-use of buildings should not prejudice the openness of Green Belts, since the buildings are already there. It can help to secure the continuing stewardship of land, especially by assisting farmers in diversifying their enterprises, and may contribute to the objectives for the use of land in Green Belts." Paragraph 3.8 of PPG2 lists criteria identifying when the re-use of buildings inside a Green Belt is not inappropriate development. These criteria do not automatically rule out the re-use of rural buildings for economic development. Furthermore, PPG2 identifies the positive role of the Green Belt in fulfilling a variety of objectives, including the provision of access into the countryside from urban areas, opportunities for outdoor sport and recreation activities and the retention and enhancement of landscapes. The development of green infrastructure networks will facilitate this role (see Core Policy 5: Sustainable Design and Construction).
- 5.35 Annex C of PPG2 makes specific provision for local planning authorities to identify sites of substantial scale as 'Major Developed Sites' within the Green Belt. In the Tunbridge Wells Borough Local Plan 2006, three sites were identified under this category:
  - Pembury Hospital, Pembury: a new replacement hospital on the Pembury site is currently under construction with a planned completion date by the end of 2011;
  - · Kent College, Pembury; and
  - Holmewood House School, Langton Green.
- 5.36 All three sites had an identifiable and substantial core of permanent buildings above 7,500sqm floorspace, a threshold considered by the Local Plan Inspector to appropriately reflect local circumstances. They remain the only three sites of this scale within the Green Belt in the Borough and it is unlikely that new developments of this scale within the Green Belt will be allocated or permitted in the period to 2026. No additions to the Major Developed Sites within the Green Belt are therefore proposed. Within such sites, however, limited infilling or redevelopment may be acceptable, offering the opportunity for environmental improvement without adding to its impact upon the openness of the Green Belt and the purposes of its designation. Planning proposals for development at these identified Major Developed Sites will be considered on their merits and will be assessed according to the criteria set out in national and local planning policies.

#### Rural Fringe (long-term land reserve)

- **5.37** The Rural Fringe strategy was initially established in the Royal Tunbridge Wells and Southborough Local Plan 1988, with the purpose of identifying and safeguarding land to meet probable longer-term development needs as required by PPG2. The Local Plan 1988 identified six Rural Fringe sites, which have been carried forward in successive Local Plans to the 2006 Local Plan. They are defined on the Proposals Map.
- **5.38** The Borough Council will maintain a land reserve as Rural Fringe to extend beyond the Plan period. The existing Rural Fringe sites will not, however, have been excluded from consideration in the first SHLAA and could, therefore, be considered for future development to form part of the Borough's development land supply. The suitability, availability and viability of Rural Fringe sites will be assessed against that of other greenfield sites contiguous with the LBD. In accordance with Core Policy 1: Delivery of Development, Rural Fringe sites, like other sites outside the LBD, will not be released unless they are allocated in a DPD.
- **5.39** In circumstances where there is a need to utilise existing Rural Fringe sites, the SHLAA, together with the Landscape Character Assessment and Capacity Study 2009, will help identify suitable broad areas to inform the designation of replacement Rural Fringe sites through the Allocations DPD to replenish the long-term land reserve.



#### Tandridge Borough Council Core Strategy (adopted October 2008)

#### Spatial Strategy (Location of Development)

- 6.1 In line with the South East Plan this strategy proposes that the majority of development will take place within the existing built up areas of Caterham, Warlingham, Whyteleafe, Oxted and Hurst Green by seeking to make best use of previously developed land (brownfield) within those areas. Development within the villages may be permitted to meet local needs. The strategy therefore acknowledges the importance of the Green Belt as a way of keeping land open and preventing the outward spread of London and existing built up areas from coalescing. No changes are currently proposed to the boundaries of the Green Belt. The strategy requires that the majority of new development is provided in locations that minimise the need to travel, in particular the need to travel by car. The strategy will be delivered by directing (in general) new development to the existing built up areas where there is a greater range of services and access to relatively better public transport.
- 6.2 However the policy on Housing Provision CSP2 does recognise that if it is not possible to allocate sufficient land without encroaching into the Green Belt, growth will be directed to land immediately adjoining built up areas, i.e. which are within the Green Belt. The precise location of such land would depend on its accessibility to services, public transport and other infrastructure, in other words the most "sustainable locations". Because of the relatively limited requirement for additional housing in Tandridge set out in the South East Plan it is not considered necessary in this Core Strategy to identify any strategic sites for housing. The Sustainability Appraisal considered the options of directing development to the built up areas by making best use of previously developed land or allocation sites of different sizes on the edge of the built up areas. It also considered the relative sustainability of the different built up areas in the district; it indicates that there are no significant differences in the sustainability of those areas. The Key Diagram shows the broad locations where development will take place; it also shows the villages (Larger Rural Settlements) where development to meet local needs may be permitted together with the Green Belt and public transport routes. No hierarchy of the built up settlements is proposed as there are no significant differences between the areas in terms of sustainability. There is no proposal to change the functions of the built up settlements either. Caterham Valley and Oxted town centres are the principal service centres and do not compete with each other. Other centres fulfil more local needs (see Section 19).
- **6.3** The Green Belt, the built up areas, the Larger Rural Settlements, and the Green Belt Settlements boundaries are defined on the Tandridge District Local Plan 2001 Proposals Map. However, Local Plan policies RE3, RE4 and RE5 will be superseded by the Core Strategy so the Green Belt Settlement boundaries will no longer apply. All of these boundaries will be reviewed in the Site Allocations DPD, which will be accompanied by a new proposals map showing the reviewed boundaries.
- 6.4 Development appropriate to the needs of rural communities in relation to Category 2 settlements, as referred to in policy CSP1, will be assessed as follows:
  - where infilling is proposed on existing residential land it should be of a scale appropriate to the size and character of the settlement and the extent to which it would not reinforce unsustainable patterns of travel;
  - where infilling comprises the redevelopment of non-residential land it would assist in delivering the objective making the best use of
    previously developed land;
  - · the proposed development would assist in meeting the need for affordable housing, particularly to meet local needs; and
  - the proposed development would assist in the retention or enhancement of community facilities.
- 6.5 The Council will apply the following tests when considering if further sites should be identified as Major Developed Sites in the Green Belt.
  - 1. Identify any sites that are major/substantial and developed.
  - 2. Consider whether there is scope for infilling of the identified sites without adding to the impact on the openness of the Green Belt and the purposes of including land within it.
  - 3. Consider whether there is scope for the complete or partial redevelopment of the identified sites which would result in an environmental improvement.
  - 4. Consider if there are any particular environmental, infrastructure or sustainability constraints which would militate against the site being designated as a MDS.

#### Policy CSP 1

#### Location of Development

In order to promote sustainable patterns of travel and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District (the Category 1 settlements listed below) and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised subject to the third paragraph of this policy. There will be no village expansion by amending the boundaries of either the Larger Rural Settlements or Green Belt Settlements. All the settlement boundaries will be reviewed in the Site Allocations DPD and the accompanying Proposals Map. Development appropriate to the needs of rural communities will be permitted in the Larger Rural Settlements (the Category 2 settlements listed below) through infilling and on sites



allocated for affordable housing. There will be no expansion of Woldingham (also a Category 2 settlement); saved policy BE7 "Woldingham" of the Tandridge District Local Plan 2001 will continue to apply to development within the settlement boundary until this is replaced by a policy in a Development Control DPD.

There will be no change in the Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations. Such changes will only take place at sustainable locations as set out in Policy CSP2 whilst having regard to the need to prevent built up areas from coalescing. Any changes will be made through a Site Allocations Development Plan Document and the accompanying Proposals Map. Where there is a requirement to allocate green field sites the preference will be to find a number of sites to disperse the impact of development; the location of such sites will need to take into account existing and proposed infrastructure and service provision.

#### Chelmsford Core Strategy (Adopted February 2008)

#### **POLICY CP5 - CONTAINING URBAN GROWTH**

Urban growth will be contained by defining the physical limit of the urban areas of Chelmsford and South Woodham Ferrers and the Defined Settlements.

Beyond the Urban Areas and Defined Settlements, the Metropolitan Green Belt as defined on the Proposals Map will be protected in accordance with national and regional policy. Planning permission for development in the Metropolitan Green Belt will be refused other than in the circumstances identified in the relevant Core and Development Control policies. Within the rural areas of the Borough beyond the Metropolitan Green Belt as defined on the Proposals Map, the Borough Council will protect and enhance the character and openness of the countryside. This will be achieved by the restriction of inappropriate development in a rural area. Planning permission for development within the rural areas beyond the Metropolitan Green Belt will be refused other than for the categories of development expressly identified in the relevant Core and Development Control policies.