

Gloucestershire Green Belt Assessment

Potential for development of sites to
fundamentally undermine the Green Belt

**Cheltenham Borough Council, Gloucester City
Council and Tewkesbury Borough Council**

Final report

Prepared by LUC

October 2026



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Contents

Chapter 1	4
Introduction	
Chapter 2	7
Policy Context and Assessment Sites	
National Green Belt policy	7
Assessment sites	9
Chapter 3	18
Assessment Methodology	
National Green Belt Planning Practice Guidance	18
Fundamental impact definitions	18
Fundamental impact outputs	20
Chapter 4	22
Assessment of Potential for Fundamental Undermining of the Green Belt Purposes	
Between Cheltenham and Bishop's Cleeve	23
North-west of Cheltenham	27
Between Gloucester and Cheltenham (west)	31
Between Gloucester and Cheltenham (south)	36
References	41

Chapter 1

Introduction

1.1 This report presents an analysis of the potential for release and development of selected sites within and adjacent to the Gloucester and Cheltenham Green Belt to fundamentally undermine the purposes of the Green Belt designation.

1.2 In April 2025 Land Use Consultants Ltd (LUC) were commissioned by Cheltenham Borough Council, Cotswold District Council, Gloucester City Council and Tewkesbury Borough Council to undertake an assessment of the Gloucester and Cheltenham Green Belt consistent with the relevant requirements of the latest National Planning Policy Framework (NPPF) published in December 2024, and Planning Practice Guidance (PPG) published February 2025.

1.3 The resulting Gloucestershire Green Belt Study (GGBS), published in October 2026, identified variations in the contribution made by land to each of the Green Belt purposes defined in the NPPF (see **Chapter 2** below), defining parcels to reflect those variations and identifying which, in accordance with the latest PPG, should be considered grey belt. The report was updated in its final version to make reference to the revised NPPF published in August 2026.

1.4 The GGBS also provided commentary on the potential for development to fundamentally undermine the Green Belt purposes. The requirement to consider this in the context of meeting development need and in determining whether development in the Green Belt would be inappropriate is set out in the NPPF (see **Chapter 2** below); however, the GGBS was a strategic assessment of contribution to the Green Belt purposes which did not assess the harm of the release and development of specific sites. Paragraph 3.121 of the GGBS stated that: “Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it is not possible to make a definitive judgement on fundamental impact. In the absence of specific proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within the Gloucestershire Green Belt. These areas of highest contribution are reviewed in the round to judge where release or development could fundamentally and meaningfully undermine the purposes”.

1.5 In the Next Steps chapter of the GGBS, Paragraph 5.6 noted that any assessment of the impact of releasing sites for development would need to: “Address the potential for the purposes of the Green Belt to be fundamentally undermined across the plan area as a whole. For a local plan, this will require the cumulative

effect of any proposed allocations to be considered: while the incremental release of individual sites may appear limited the combined impact could be significantly greater. The Council should, therefore, take a broad strategic perspective when identifying potential allocations”.

1.6 Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council (the SLP Authorities) are in the process of preparing the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). This plan will need to identify site allocations to meet development need, and as part of the SLP preparation process a call for sites was undertaken in the autumn of 2025 from which the SLP Authorities will prepare a Housing and Employment Land Availability Assessment (HELAA). Some of the promoted sites are in the Green Belt.

1.7 This report takes the high-level analysis of potential for fundamental undermining of the Green Belt that was set out in Chapter 4 of the GGBS and refines it by limiting its scope to sites identified in the emerging HELAA (published on the SLP HELAA Sites Map in November 2025) which have subsequently been shortlisted by the SLP Authorities for potential allocation. It specifically addresses three requirements:

- To assess whether the allocation of land identified as grey belt, if allocated or proposed for development by a planning application, would fundamentally undermine the purposes, when taken together, of the remaining Green Belt land across the area of the plan;
- To assess, individually or cumulatively (with grey belt and other potential allocations), whether the allocation of draft sites/strategic sites proposed in the Green Belt by the SLP Authorities would fundamentally undermine the purposes, when taken together, of the remaining Green Belt land across the area of the plan; and
- To make recommendations on the extent to which the impact on the remaining Green Belt could be mitigated or reduced to an acceptable level by modifying the boundaries of sites/strategic sites.

1.8 As there are no sites in or near to the small area of Green Belt land that lies within Cotswold District there is not considered to be any significant potential for the Green Belt purposes to be fundamentally undermined within the Cotswold Local Plan area.

1.9 This report represents an advancement of the analysis set out in the GGBS but it does not consider specific development proposals for any of the promoted sites and cannot, therefore, make definitive judgements as to whether their development would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

1.10 The remainder of this report is structured as follows:

- **Chapter 2** sets out the key components of national planning policy in relation to the impact of development on the Green Belt purposes, and lists and maps the sites included in the assessment;
- **Chapter 3** sets out the methodology used to undertake the assessment; and
- **Chapter 4** lists the sites in the context of the GGBS assessment outputs and presents the findings of the analysis, in text and maps, split down into sub-areas.

It should be noted that this report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.2). This means it must have larger font, larger spacing between lines and headings.

Chapter 2

Policy Context and Assessment Sites

2.1 This chapter sets out the key components of national planning policy in relation to the impact of development on the Green Belt purposes, and lists and maps the sites included in the assessment.

2.2 For a fuller description of national and local Green Belt policy and national guidance for the assessment of Green Belt to identify grey belt, see Chapter 2 of the GGBS.

National Green Belt policy

Aims and purposes

2.3 Government policy on the Green Belt and grey belt is set out in policies GB1-GB8 of chapter 13 of the NPPF 'Protecting Green Belt land' [\[See reference 1\]](#).

2.4 The NPPF states that “the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential features of which are their openness and permanence”.

2.5 This is elaborated on in NPPF policy GB2: Assessing existing Green Belt land, which states that Green Belts serve five purposes, as set out below:

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

Development in the Green Belt

2.6 The NPPF explains that development in the Green Belt is inappropriate unless covered by one of the exceptions set out in policy GB7: Development which is not inappropriate in the Green Belt (see Glossary in Appendix A). Policy GB6 sets out that inappropriate development is by definition harmful to the Green Belt and that,

when considering planning applications, 'substantial weight' should be given to any harm to the Green Belt, including harm to its openness.

2.7 Policy GB3: Altering existing Green Belt boundaries states that Green Belt boundaries should only be altered through the preparation or updating of plans where exceptional circumstances are fully evidenced and justified. Exceptional circumstances in this context include a local planning authority being unable to meet its identified need for development in full, having examined all other reasonable options for doing so. Notable reasonable options include:

- “a) making as much use as possible of suitable previously developed and underutilised land;
- b) optimising the density of development in accordance with the policy L1; and
- c) assessing whether sufficient suitable sites can be identified outside the Green Belt.”

2.8 Policy GB3 goes on to state that “where a development plan’s spatial strategy has identified suitable land around well connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering Green Belt boundaries”.

2.9 Policy GB4: Defining Green Belt boundaries states that “when defining Green Belt boundaries, whether as a result of altering or establishing Green Belts, local plans should:

- a) Only include land which it is necessary to keep permanently open as Green Belt;
- b) Include villages within the Green Belt where it is necessary to restrict development because of the important contribution the open character of the village makes to the openness of the Green Belt. Such villages should not be identified as ‘settlements’ for the purpose of the spatial strategy in the development plan;
- c) Use other, more relevant, policy approaches, such as conservation area designation where the character of a village needs to be protected for other reasons;
- d) Demonstrate that new Green Belt boundaries are broadly consistent with the spatial strategy for accommodating growth and meeting development needs across the plan area and adjoining areas, including those of any relevant spatial development strategies. This includes ensuring that any alterations to Green Belt boundaries promote sustainable patterns of development, including by:

- i. Giving priority to the release of previously developed land within the Green Belt, then to grey belt land which is not previously developed, and then other Green Belt locations, so long as this promotes a sustainable pattern of development overall; and
- ii. Not proposing alterations where there is clear evidence these alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan.
- e) Ensure that allocations for major development involving the provision of housing on land released from the Green Belt can meet the Golden Rules, as set out in policy GB8, and that these requirements are set out within the local plan;
- f) Ensure Green Belt boundaries are defined clearly, using physical features that are readily recognisable and likely to be defensible; and
- g) Identify areas of safeguarded land, where necessary to meet longer-term development needs well beyond the plan period. It should be made clear that safeguarded land is not allocated for development at the present time (and does not form part of settlements), and that its status will change only when the plan is updated and proposes that the land is released for development.”

Assessment sites

2.10 The potential development sites submitted in the 2025 Call for Sites which have been shortlisted by the SLP Authorities for further consideration are listed in **Table 2.1** below and illustrated on **Figure 2.1**.

Table 2.1: Potential development sites

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
Between Cheltenham and Bishop's Cleeve	BIS003	Land at 105 Cheltenham Road, Bishop's Cleeve	Service village site	0.62	Yes
Between Cheltenham and Bishop's Cleeve	BIS018	Land lying to the south of Stoke Road, Bishop's Cleeve	Service village site	9.42	Yes
Between Cheltenham and Bishop's Cleeve	BIS021	Land west of A435 and south of Stoke Orchard Road, Bishop's Cleeve	Service village site	45.43	Yes
Between Cheltenham and Bishop's Cleeve	S011	The Paddocks, Swindon Lane	Urban site	1.79	Yes
Between Cheltenham and Bishop's Cleeve	S012	Land at Hunting Butts (east), Evesham Road	Urban site	11.64	Yes
Between Cheltenham and Bishop's Cleeve	S017	Land off New Barn Lane 3 (south of Racecourse)	Urban site	2.07	Yes
Between Cheltenham and Bishop's Cleeve	S019	Land east of Cheltenham Racecourse 2, Park Lane	Urban site	1.23	Yes
Between Cheltenham and Bishop's Cleeve	S143	Land north of Park Lane	Urban site	1.90	Yes
Between Cheltenham and Bishop's Cleeve	S147	Land off Brockhampton Lane 2, Swindon Village	In JCS employment allocation (but predominantly housing)	5.3	No
Between Cheltenham and Bishop's Cleeve	S151	Land at Morris Hill	HELAA cluster	40.59	Yes
Between Cheltenham and Bishop's Cleeve	S152	Land at Hyde Farm (east & west)	HELAA cluster	89	Yes

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
Between Cheltenham and Bishop's Cleeve	S154	Land at Home Farm	In JCS employment allocation (but predominantly housing)	12.23	No
Between Cheltenham and Bishop's Cleeve	S166	Elms Park	In JCS employment allocation (but also housing)	242.77	No
Between Cheltenham and Bishop's Cleeve	S168	Maenan Stud, Brockhampton Lane	Urban site and JCS employment allocation	2.74	No
Between Cheltenham and Bishop's Cleeve	S172	Parsons Piece, Swindon Village	Urban site and JCS employment allocation	5.14	No
Between Cheltenham and Bishop's Cleeve	S175	Land at Hunting Butts Farm	Urban site	7.9	Yes
Between Cheltenham and Bishop's Cleeve	UCK002A	Land to the north west of Cheltenham, north and south of A4019 (Uckington)	JCS employment allocation	66.61	No
Between Cheltenham and Bishop's Cleeve	UCK003	Fairfield, The Orchards	JCS employment allocation	5.71	No
Between Cheltenham and Bishop's Cleeve	WOO007	Land south of Two Hedges Road, Bishop's Cleeve	Service village site	5.5	Yes
North-west of Cheltenham	BOD013A	Land around Boddington (site A)	Reasonable alternative strategic cluster	129.13	Yes
North-west of Cheltenham	BOD013B	Land around Boddington (site B)	Reasonable alternative strategic cluster	78.76	Yes
North-west of Cheltenham	BOD013C	Land around Boddington (site C)	Reasonable alternative strategic cluster	57.14	Yes

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
North-west of Cheltenham	ELM008	Barn Farm, Elmstone Hardwick, GL51 9TG	HELAA cluster	5.88	No
North-west of Cheltenham	ELM011	Land North West of Junction 10 of M5 at Hardwicke, GL519TN	Reasonable alternative strategic cluster	81.73	No
North-west of Cheltenham	ELM012	Church Lane Farm, Elmstone Hardwicke	HELAA cluster	3.42	No
North-west of Cheltenham	ELM013	Land at Villa Farm, Elmstone Hardwicke	HELAA cluster	26.23	No
North-west of Cheltenham	LEI009	Land at Vinetree Farm, Tewkesbury Road, Coombe Hill, Gloucester, GL19 4AS and Dean's Piece, Coombe Hill, Gloucester	Service village site	6.18	Yes
North-west of Cheltenham	STOK011	Land to the east of Sherborne Homes, Stoke Orchard, Cheltenham, GL527SB	Service village site	1.14	Yes
North-west of Cheltenham	STOK012	Land to the east of Willow Cottage, Stoke Orchard, Cheltenham, GL527SB	Service village site	0.42	Yes
North-west of Cheltenham	STOK013	Land to the south of Stoke Road, Cheltenham, GL52 7SB	Service village site	0.90	Yes
North-west of Cheltenham	UCK006A	Manor Farm, Tewkesbury Road, Uckington (site A)	Reasonable alternative strategic cluster	22.35	Yes
North-west of Cheltenham	UCK008	Elms Park	HELAA cluster	80.95	No
North-west of Cheltenham	UCK010	Land to the North East of Junction 10 of M5, Uckington	HELAA cluster	9.44	No

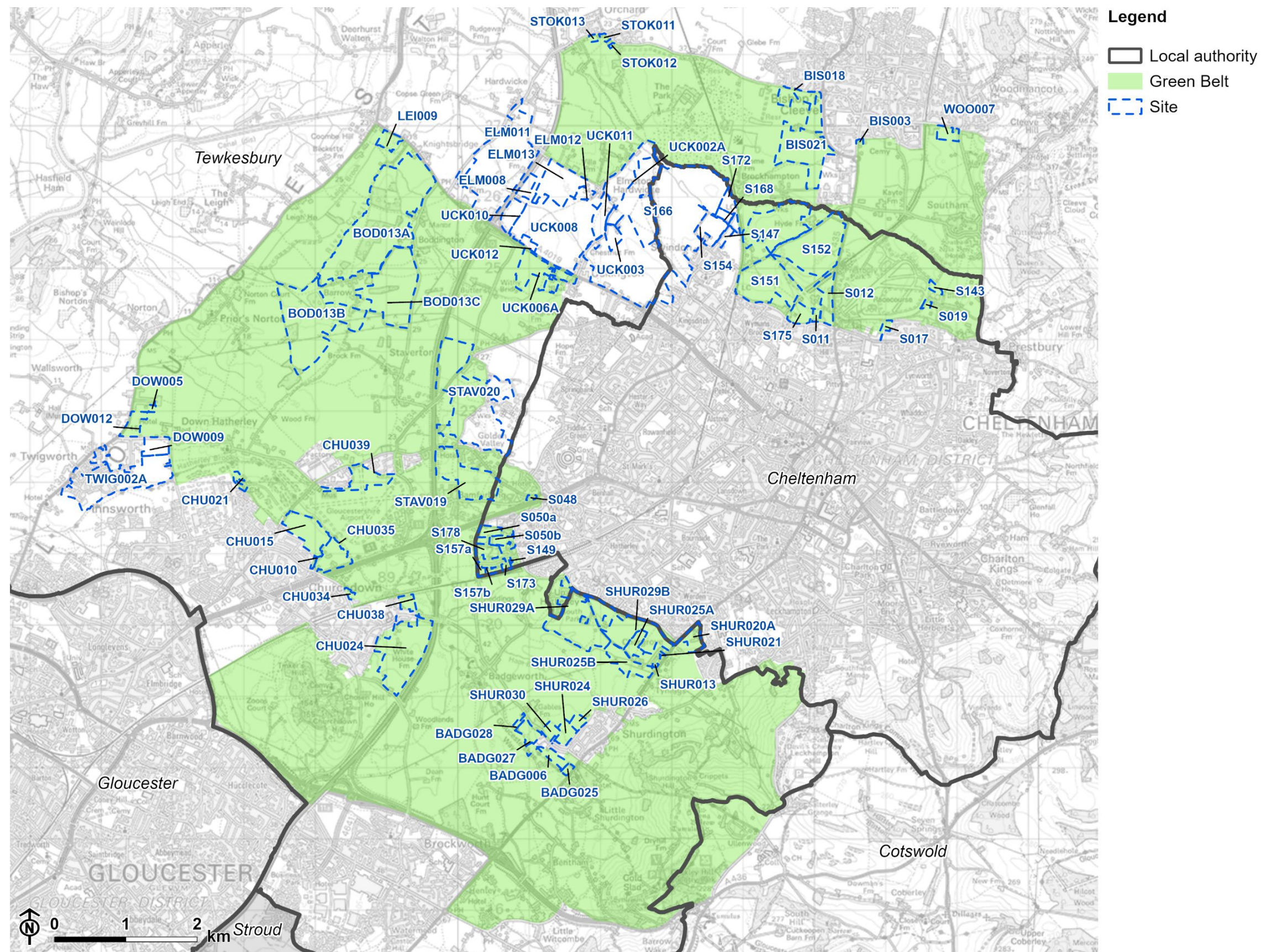
Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
North-west of Cheltenham	UCK011	Land to the north west of Cheltenham, north and south of A4019 (Uckington)	HELAA cluster	10.44	No
North-west of Cheltenham	UCK012	Manor Farm, Tewkesbury Road, Uckington	HELAA cluster	2.93	No
Between Gloucester and Cheltenham (west)	CHU010	Land to the west of Buttermilk Lane	HELAA cluster	0.67	Yes
Between Gloucester and Cheltenham (west)	CHU015	Parton Farm, Land to the West of Gloucestershire Airport	HELAA cluster	22.1	Yes
Between Gloucester and Cheltenham (west)	CHU021	Land at Brickhampton Court	Reasonable alternative village site	2.24	Yes
Between Gloucester and Cheltenham (west)	CHU024	Land at White House Farm	HELAA cluster	49.71	Yes
Between Gloucester and Cheltenham (west)	CHU034	Land and Barn at Parton Court Farm Station Road, Churchdown, GL3 2JG	Reasonable alternative village site	1.22	Yes
Between Gloucester and Cheltenham (west)	CHU035	Evergreen Nurseries, Parton Road, Churchdown, Gloucester, GL3	HELAA cluster	14.57	Yes
Between Gloucester and Cheltenham (west)	CHU038	Brookfield Road, Churchdown	HELAA cluster	4.63	Yes
Between Gloucester and Cheltenham (west)	CHU039	Land at Gloucestershire Airport	Employment	15.40	Yes
Between Gloucester and Cheltenham (west)	DOW005	The Pines, Broadclose Road	HELAA cluster	0.91	Yes
Between Gloucester and Cheltenham (west)	DOW009	Land on the south side of Down Hatherley Lane, Down Hatherley, GL2 9QA	HELAA cluster	9.05	No

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
Between Gloucester and Cheltenham (west)	DOW012	Land to the east of the A38, Twigworth, GL2 9PU	HELAA cluster	7.83	Yes
Between Gloucester and Cheltenham (west)	S048	Land between A40 and Bamfurlong Lane (east)	Reasonable alternative village site	0.91	Yes
Between Gloucester and Cheltenham (west)	S050A	Land off Badgeworth Road, south of North Road West	Urban site	4.60	Yes
Between Gloucester and Cheltenham (west)	S050B	Land north of Branch Road, west of Grovefield Way	Urban site	4.74	Yes
Between Gloucester and Cheltenham (west)	S149	The Maples, The Reddings	Urban site	0.25	Yes
Between Gloucester and Cheltenham (west)	S157A	Land at the Hayloft (west), The Reddings/Badgeworth Road	Urban site	1.72	Yes
Between Gloucester and Cheltenham (west)	S157B	Land at The Hayloft (west/south), The Reddings	Urban site	1.38	Yes
Between Gloucester and Cheltenham (west)	S173	The Briars, The Reddings	Urban site	1.45	Yes
Between Gloucester and Cheltenham (west)	S178	Land south of Branch Road, the Reddings	Urban site	6.20	Yes
Between Gloucester and Cheltenham (west)	STAV019	Land South of the B4063, Bamfurlong	HELAA cluster	36.14	Yes
Between Gloucester and Cheltenham (west)	STAV020	Hayden Lane, Cheltenham	HELAA cluster	95.27	Yes
Between Gloucester and Cheltenham (west)	TWIG002A	Land at Twigworth (site A)	HELAA cluster	59.59	No

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
Between Gloucester and Cheltenham (east)	BADG006	Part of Normansbrook Farm, Sandy Pluck Lane	Service village site	6.76	Yes
Between Gloucester and Cheltenham (east)	BADG025	Land at Longlands, Shurdington Road	Service village site	1.68	Yes
Between Gloucester and Cheltenham (east)	BADG027	Land South of Badgeworth Lane	Service village site	6.58	Yes
Between Gloucester and Cheltenham (east)	BADG028	Fair Acres, Badgeworth Lane	Service village site	1.27	Yes
Between Gloucester and Cheltenham (east)	SHUR013	Land at Chargrove House, Shurdington Road	Rural settlement sites	0.46	Yes
Between Gloucester and Cheltenham (east)	SHUR020A	Land at Brizen Farm	Urban site	7.59	Yes
Between Gloucester and Cheltenham (east)	SHUR021	Land at Chargrove Paddock	Rural settlement sites	0.51	Yes
Between Gloucester and Cheltenham (east)	SHUR024	Land off Badgeworth Lane, Shurdington, GL51 4UQ	Service village site	6.27	Yes
Between Gloucester and Cheltenham (east)	SHUR025A	Land at Oak Farm, Chargrove Lane, Cheltenham (site A)	HELAA cluster	6.96	Yes
Between Gloucester and Cheltenham (east)	SHUR025B	Land at Oak Farm, Chargrove Lane, Cheltenham (site B)	HELAA cluster	13.80	Yes
Between Gloucester and Cheltenham (east)	SHUR026	Land off Lambert Avenue, Shurdington, Cheltenham	Service village site	3.62	Yes
Between Gloucester and Cheltenham (east)	SHUR029A	Land south of Up Hatherley Way (site A)	HELAA cluster	41.13	Yes

Location	HELAA Ref	Site Name	Potential Allocation Type	Area (ha)	Green Belt?
Between Gloucester and Cheltenham (east)	SHUR029B	Land south of Up Hatherley Way (site B)	HELAA cluster	35.03	Yes
Between Gloucester and Cheltenham (east)	SHUR030	Land north of Badgeworth Lane, Shurdington	Service village site	4.14	Yes

Figure 2.1: Sites considered in assessment



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Chapter 3

Assessment Methodology

3.1 The GGBS set out an approach to determining potential for development to have a fundamental impact on remaining Green Belt land, with reference to the wording of the NPPF and PPG. This chapter repeats the definitions set out in the GGBS methodology chapter and describes the approach that has been used to produce assessment outputs.

National Green Belt Planning Practice Guidance

3.2 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance (PPG, February 2025) on Green Belt planning and how to assess Green Belt land in order to identify grey belt. This section of PPG was substantially re-written in February 2025 to set out guidance for undertaking Green Belt assessments in order to identify grey belt, and the key section setting out guidance for identifying grey belt land was incorporated in Annex E of the August 2026 NPPF. The methodology used to undertake the Gloucestershire Green Belt Assessment was based on this guidance.

3.3 However, the guidance says little regarding determining the extent to which “release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) across the plan area as a whole”. Paragraph 008 of the PPG (Reference ID 64-008-20250225) says that: “In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”.

Fundamental impact definitions

3.4 Annex E uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Plan area’

3.5 The plan area is the extent of Green Belt within the SLP area of Gloucester, Cheltenham and Tewkesbury.

‘Purposes (taken together)’

3.6 Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact will vary depending on which purposes are important. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way. It is not necessary for all the Green Belt purposes to be weakened in order for the Green Belt to be ‘fundamentally undermined’.

‘Fundamental’ and ‘meaningful’

3.7 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in the plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

3.8 The scale and contiguity of Green Belt land within a district may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in a district with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

3.9 A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) may include, but is not limited to, where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent ‘satellite’ settlement such that the adjacent settlement would be perceived to be part of a larger ‘sprawling’ large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

3.10 A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) may include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Even if towns are not direct neighbours, there may be only fragile Green Belt separation between them

when taking into account intervening smaller urban areas. Whether the merging of two neighbouring towns is meaningful may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

3.11 A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) may include where release or development would increase urbanising influence on a significant proportion of Green Belt countryside within the plan area. For example, where release or development would sever and isolate substantial areas of the remaining Green Belt land contributing strongly to Purpose C from the wider countryside. Most encroachment on the countryside will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil a countryside function.

3.12 A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character.

3.13 A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previously developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined.

Fundamental impact outputs

3.14 The GGBS reviewed areas of highest contribution to the Green Belt purposes in order to judge where release or development may have potential to fundamentally and meaningfully undermine the purposes. Having the boundaries of potential development sites, as submitted to the Call for Sites in 2025, allows a more precise analysis to be made although, as noted in **Chapter 1**, as it does not consider specific development proposals for any of the promoted sites it cannot make definitive judgements. Instead, there is a blanket assumption that there will be a loss of openness across a site if it is developed, and that development would be of a similar scale to that in neighbouring urban areas.

3.15 Firstly, the GGBS assessment parcels are listed for each promoted site. Many sites lie within a single parcel but some span more than one parcel. The ratings for contribution to each purpose are set out for each parcel, together with the size of the

site, or part-site, within the parcel and indication of whether it was identified as grey belt.

3.16 Drawing on the analysis of potential for fundamental impact that was set out in the findings chapter (Chapter 4) of the GGBS, the Green Belt is then subdivided into four smaller areas, each with a different general relationship with urban areas. For each of these areas the following outputs have been produced:

- A map, on an Ordnance Survey base, showing sites and GGBS parcels and indicating which of the latter were identified as grey belt.
- Key concerns identified in the GGBS regarding potential for fundamentally undermining the Green Belt purposes.
- A judgement as to whether the allocation of all land in sites identified as grey belt would fundamentally undermine the purposes, when taken together, of the remaining Green Belt land across the area of the plan. The judgements state whether there is 'clear potential', 'some potential' or 'little potential' for fundamental undermining.
- A judgement as to whether the allocation of draft sites/strategic sites proposed in the Green Belt by the SLP Authorities (whether on grey belt or not) would, individually or cumulatively, fundamentally undermine the purposes, when taken together, of the remaining Green Belt land across the area of the plan. The judgements state whether there is 'clear potential', 'some potential' or 'little potential' for fundamental undermining.
- Recommendations on the extent to which the impact on the remaining Green Belt could be mitigated or reduced to an acceptable level by modifying the boundaries of sites/potential allocations. This is not a site-by-site analysis but focuses on whether is potential for measures to reduce impact on the Green Belt purposes where we've said that there is 'clear potential' or 'some potential' for fundamental undermining.

Chapter 4

Assessment of Potential for Fundamental Undermining of the Green Belt Purposes

4.1 This chapter presents the findings of the assessment of potential for development of selected sites to fundamentally undermine the purposes of Green Belt (taken together) across the SLP plan area as a whole. Findings are split into four areas:

- Between Cheltenham and Bishop's Cleeve;
- North-west of Cheltenham;
- Between Gloucester and Cheltenham (west); and
- Between Gloucester and Cheltenham (south).

Between Cheltenham and Bishop's Cleeve

Figure 4.1: Sites and parcels between Cheltenham and Bishop's Cleeve

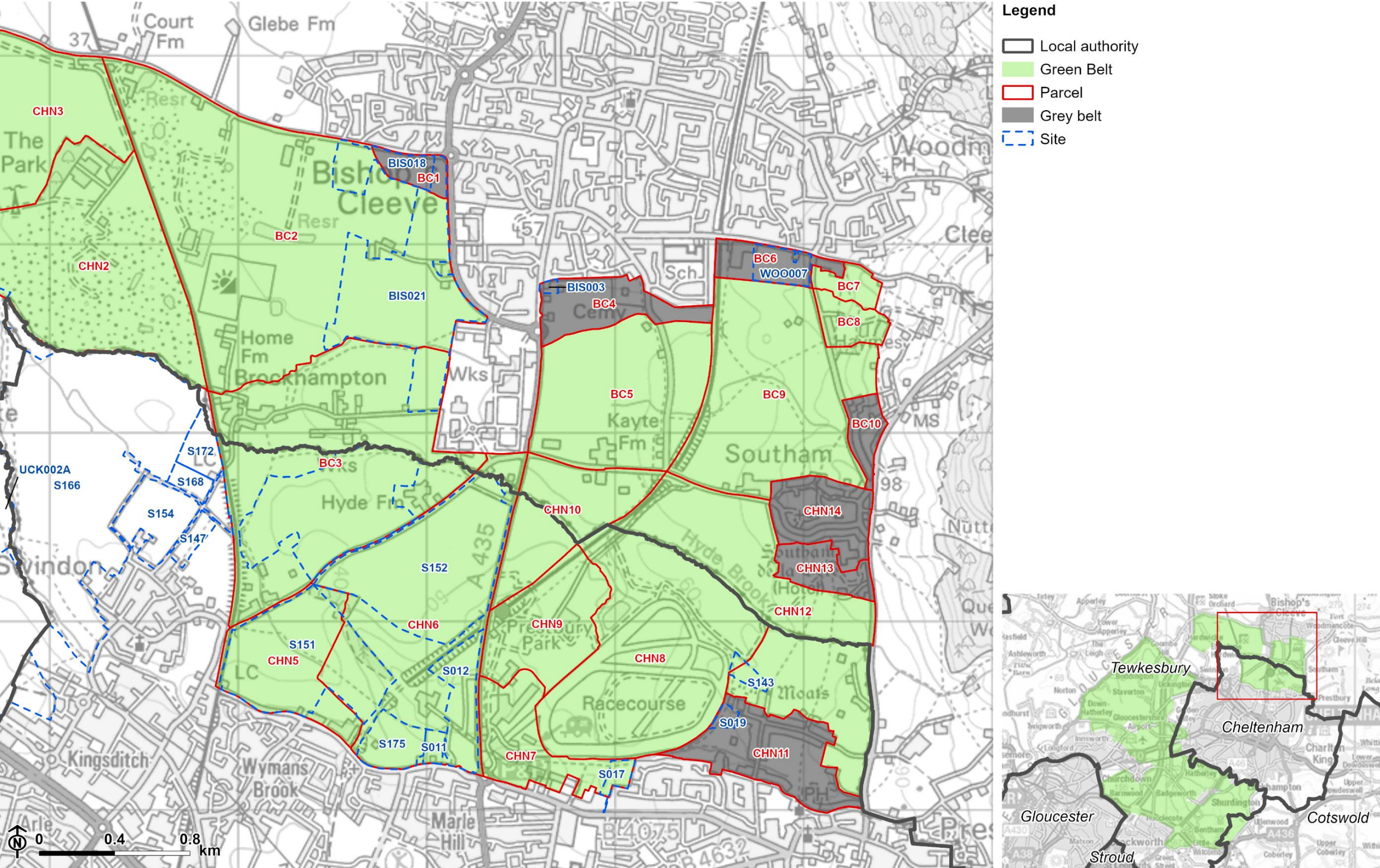


Table 4.1: Green Belt sites and parcels between Cheltenham and Bishop's Cleeve

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
BIS003	BC4	0.60	Moderate	Weak/No	Moderate	Weak/No	Yes
BIS018	BC1	4.40	Moderate	Moderate	Moderate	Weak/No	Yes
BIS018	BC2	5.02	Strong	Strong	Strong	Weak/No	No
BIS021	BC1	1.59	Moderate	Moderate	Moderate	Weak/No	Yes
BIS021	BC2	38.07	Strong	Strong	Strong	Weak/No	No
BIS021	BC3	5.76	Strong	Strong	Strong	Weak/No	No
S011	CHN6	1.79	Strong	Strong	Strong	Moderate	No
S012	CHN6	11.62	Strong	Strong	Strong	Moderate	No
S017	CHN7	2.02	Moderate	Weak/No	Moderate	Strong	No
S019	CHN11	1.23	Weak/No	Weak/No	Moderate	Moderate	Yes
S143	CHN12	1.49	Strong	Strong	Strong	Moderate	No
S143	CHN8	0.41	Strong	Strong	Strong	Strong	No
S151	CHN5	29.39	Strong	Strong	Strong	Moderate	No
S151	CHN6	11.19	Strong	Strong	Strong	Moderate	No
S152	CHN6	88.99	Strong	Strong	Strong	Moderate	No
S175	CHN6	7.84	Strong	Strong	Strong	Moderate	No
WOO007	BC6	5.50	Moderate	Weak/No	Moderate	Weak/No	Yes

Key concerns

4.2 The extent of the Gloucester and Cheltenham Green Belt was extended in 1981 specifically to maintain separation between Cheltenham and Bishop's Cleeve. Most of the original Green Belt was located between Gloucester and Cheltenham, so preservation of the gaps between these three settlements is the fundamental purpose of the Green Belt and loss of either gap would fundamentally undermine the purposes.

Impact of development of grey belt sites

4.3 The relative proximity of Cheltenham and Bishop's Cleeve means that only relatively small areas of land have been identified as grey belt in this area. Of these, the only ones containing assessed sites are:

- BC1 – containing a small part of site BIS021 (1.59 hectares) and part of site BIS018 (4.4 hectares)
- BC4 – containing site BIS003 (0.6 hectares)
- BC6 – containing site WOO007 (5.5 hectares)
- CHN11 – containing site S019 (1.23 hectares)

4.4 These are all relatively small areas located close to the urban edges of Cheltenham and Bishop's Cleeve. There is little potential for their development, in combination, to fundamentally undermine the Green Belt purposes.

Sites with potential to fundamentally undermine the purposes

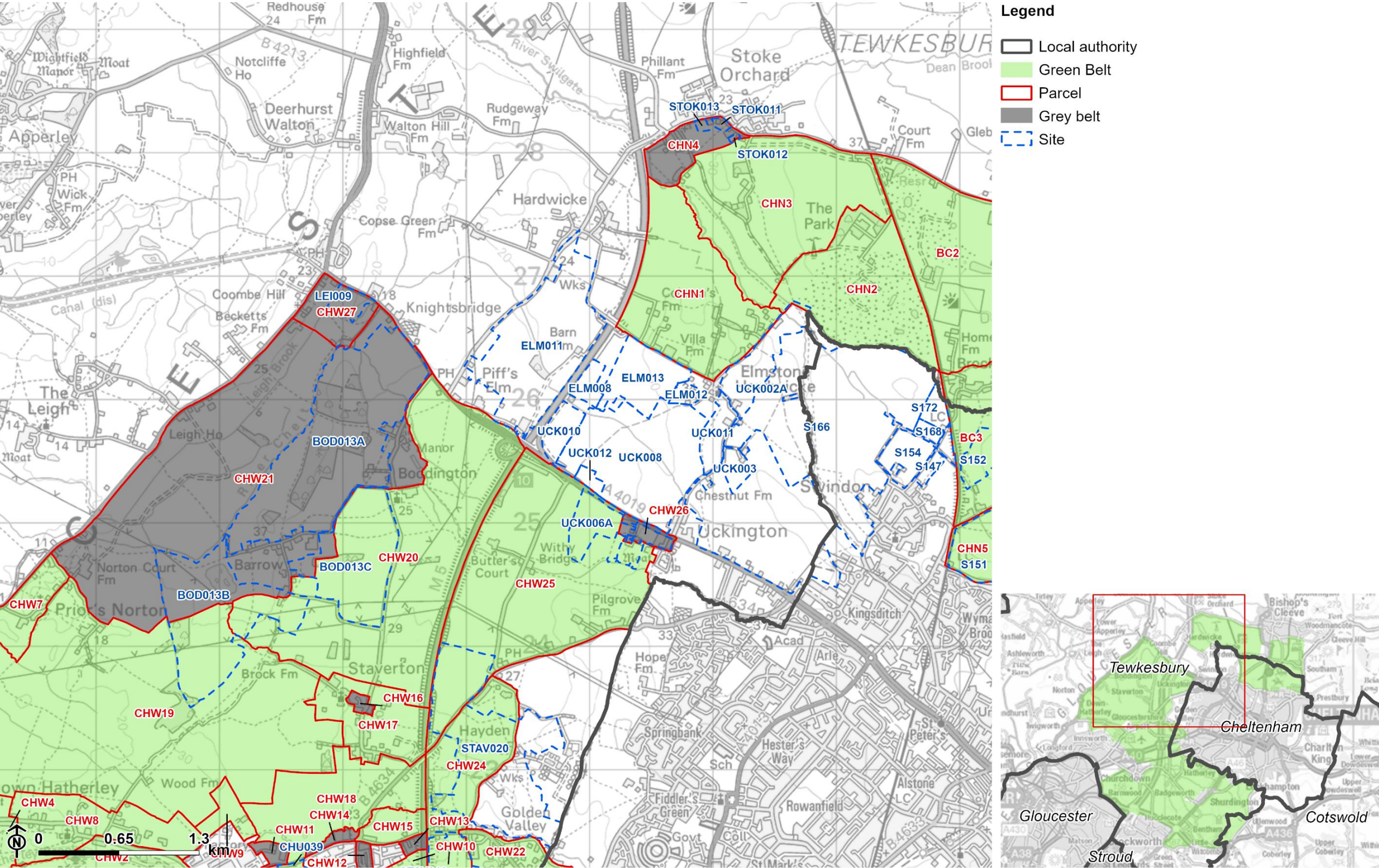
4.5 One site has clear potential, even if developed isolation, to fundamentally undermine the Green Belt purposes. S152 is located close enough to the edge of Cheltenham for its development to constitute an extension to the town. It lies on a north-facing slope in a visually open landscape and, to the north-west, has only a very small gap to the edge of Bishop's Cleeve (at Cleeve Business Park). Development would almost completely split the Green Belt into two separate parts, having a substantial impact on Purpose A and Purpose B and also encroaching on countryside (Purpose C). Only a very substantial reduction in the site area could potentially reduce this impact (inset development at Cleeve Business Park already almost reaches the River Swilgate, so the boundary of Cheltenham short stop a clear distance short of the river) but even this would still leave some potential for fundamental undermining.

4.6 Development of the North West Cheltenham Joint Core Strategy (JCS) allocation, on land to the west of the railway line, would not in isolation have a substantial impact on the gap between Cheltenham and Bishop's Cleeve, but in combination with the development of BIS021 the gap would be reduced to only around 700m. There would be clear potential in this circumstance for a fundamental undermining of the purposes. Leaving site S172 and the north-eastern edge of S166 (centred on low hill N of Swindon Village) undeveloped would reduce the 'clear potential' to 'some potential', and limiting development to the northern and eastern parts of BIS021 would do likewise. If both measures were adopted, and boundaries of BIS021 strengthened, there would be little likelihood of fundamental undermining.

4.7 Development of other sites in this area, either individually or in combination, would create little likelihood of fundamentally undermining the purposes.

North-west of Cheltenham

Figure 4.2: Sites and parcels north-west of Cheltenham



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Table 4.2: Green Belt sites and parcels north-west of Cheltenham

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
BOD013A	CHW21	129.09	Moderate	Weak/No	Strong	Weak/No	Yes
BOD013B	CHW19	31.83	Strong	Moderate	Strong	Weak/No	No
BOD013B	CHW20	15.29	Strong	Weak/No	Strong	Weak/No	No
BOD013B	CHW21	31.65	Moderate	Weak/No	Strong	Weak/No	Yes
BOD013C	CHW20	51.33	Strong	Weak/No	Strong	Weak/No	No
BOD013C	CHW21	5.80	Moderate	Weak/No	Strong	Weak/No	Yes
LEI009	CHW27	6.18	Weak/No	Weak/No	Strong	Weak/No	Yes
STOK011	CHN4	1.14	Moderate	Weak/No	Strong	Weak/No	Yes
STOK012	CHN4	0.36	Moderate	Weak/No	Strong	Weak/No	Yes
STOK013	CHN4	0.90	Moderate	Weak/No	Strong	Weak/No	Yes
UCK006A	CHW25	3.51	Strong	Weak/No	Strong	Moderate	No
UCK006A	CHW25	14.07	Strong	Weak/No	Strong	Moderate	No
UCK006A	CHW26	4.75	Moderate	Weak/No	Moderate	Moderate	Yes

Key concerns

4.8 The key aims of the Gloucester and Cheltenham Green Belt are to preserve separation between those towns and, as noted above, between Cheltenham and Bishop's Cleeve. Land to the north-west of Cheltenham plays a weaker role with regard to Purpose B, with Tewkesbury being some distance away to the west, but there is still a concern that development in this direction could increase urbanising influence on neighbouring areas which are playing a less peripheral role in preventing the merger of towns.

4.9 The release of land in the vicinity of Swindon Village and Uckington in the 2017 Joint Core Strategy (JCS) split the Green Belt in two. To an extent this reflects its more peripheral role, but it offers greater potential for urbanising development to create containment around areas of Green Belt and so weaken their integrity.

4.10 The M5 is a key separating feature in the narrowest part of the gap between Cheltenham and Gloucester, near to Churchdown, and it extends north from here to run through the countryside west of Cheltenham. Development expanding Cheltenham to breach the M5 would be a significant change in urban form that would also increase the fragility of separation between the towns.

Impact of development of grey belt sites

4.11 Several small sites lie in parcels identified as grey belt, but also a much larger site and parts of adjoining sites in the same strategic cluster:

- CHN4 – containing sites STOK011 (1.14 hectares), STOK012 (0.36 hectares) and STOK013 (0.9 hectares)
- CHW21 – containing site BOD013A (129.09 hectares) and parts of BOD013B (31.65 hectares) and BOD013C (5.8 hectares)
- CHW26 – containing part of site UCK006A (4.75 hectares)
- CHW27 – containing site LEI009 (6.18 hectares)

4.12 The STOK parcels are small sites on the southern edge of the village of Stoke Orchard. The grey belt part of UCK006A, on the edge of Cheltenham at Uckington and LEI009 at Coombe Hill, are also relatively small areas. There is little potential for their development, in combination, to fundamentally undermine the Green Belt purposes.

4.13 The Boddington sites in CHW21 occupy a much larger area but one which is far enough from Cheltenham and from Gloucester not to play a strong role with regard to

Purpose A or Purpose B. Land here does make a strong contribution to Purpose C, but development would not prevent areas of countryside between here and both Cheltenham and Gloucester from still contributing strongly to this purpose, so there would be little potential for a fundamental undermining of the Green Belt purposes across the plan area as a whole.

Sites with potential to fundamentally undermine the purposes

4.14 The expansion of the Boddington development from the grey belt land in CHW21 to include those parts of BOD013B and BOD013C that lie within parcel CHW20 would more significantly weaken remaining open land between the development and the M5, and development of that part of site STAV020 that lies within parcel CHW20, to the east of the motorway, would likewise weaken remaining open land between Cheltenham and the M5. In combination these developments would have some potential to fundamentally undermine the Green Belt; primarily in terms of Purpose A, by creating a new urban area that lacks strong separation from Cheltenham, with existing development at Staverton weakening the gap, but also with some impact on Purposes B and C.

4.15 In the absence of Green Belt land between the edge of BOD013A and the edge of Cheltenham, development of the sites between parcels CHN1 and CHW25, up to the M5, would leave a much narrower gap between the town and any new development in BOD013A. This would increase the relevance of Purpose A to at least part of parcel CHW21, such that it would no longer be classified as grey belt and would create some potential for fundamental undermining.

4.16 The expansion of Cheltenham beyond the M5 into site ELM011 would, in combination with new development in BOD013A, mean that the latter would be too close not to be considered part of the large built-up area. This would create clear potential for fundamentally undermining Purpose A.

4.17 For all these scenarios, limiting development to areas sloping north and westwards down towards the River Chelt and strengthening boundary screening, for example with further woodland planting, could reduce potential for fundamental undermining.

Between Gloucester and Cheltenham (west)

Figure 4.3: Sites and parcels between Gloucester and Cheltenham (west)

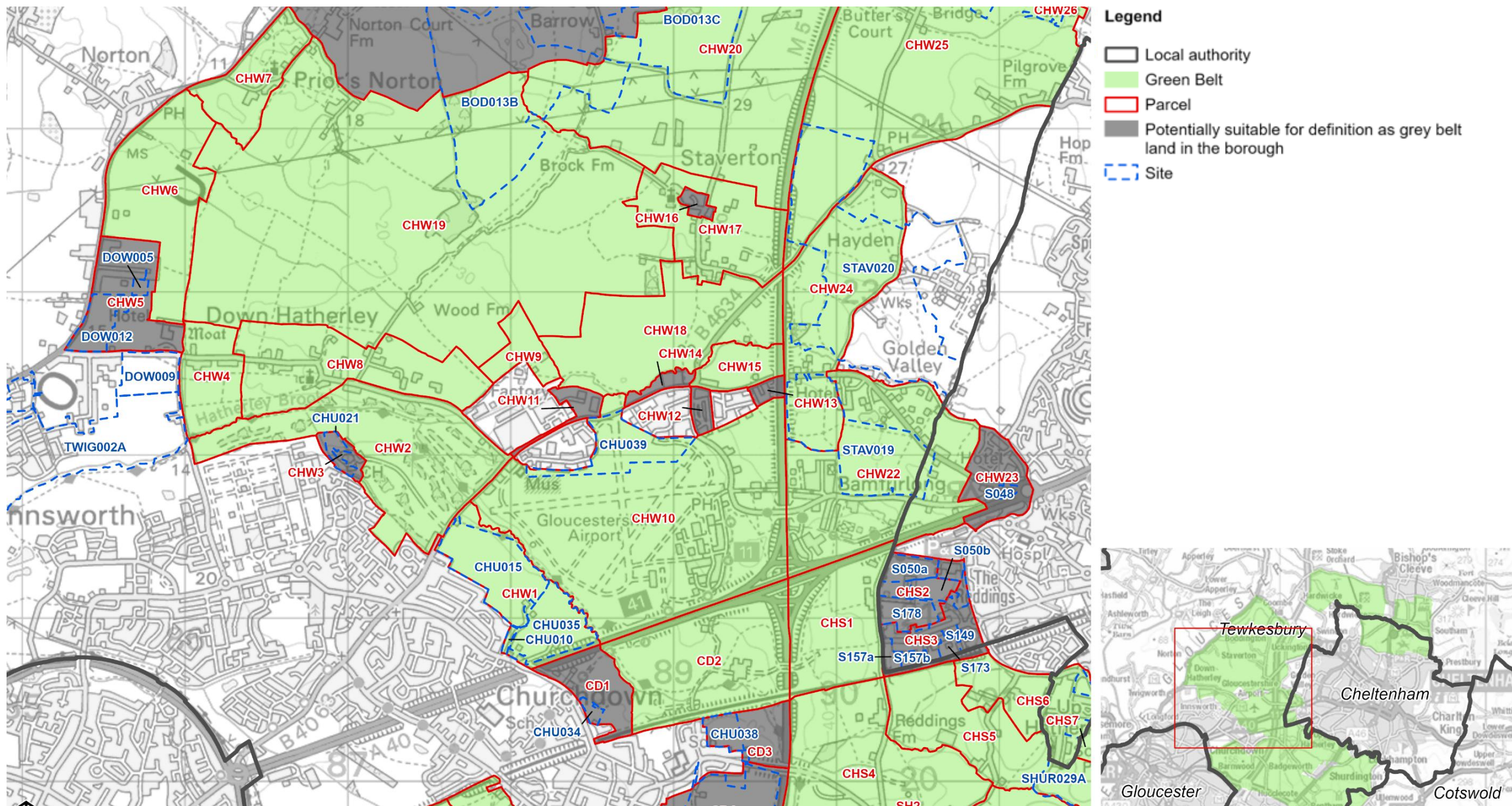


Table 4.3: Green Belt sites and parcels between Gloucester and Cheltenham (west)

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
CHU010	CHW1	0.66	Moderate	Strong	Moderate	Weak/No	No
CHU015	CHW1	22.05	Moderate	Strong	Moderate	Weak/No	No
CHU021	CHW3	2.22	Moderate	Moderate	Moderate	Weak/No	Yes
CHU024	CD4	49.43	Moderate	Moderate	Strong	Weak/No	Yes
CHU034	CD1	1.22	Moderate	Moderate	Moderate	Weak/No	Yes
CHU035	CHW1	14.56	Moderate	Strong	Moderate	Weak/No	No
CHU038	CD3	4.58	Moderate	Moderate	Moderate	Weak/No	Yes
CHU039	CHW10	15.33	Moderate	Strong	Moderate	Weak/No	No
DOW005	CHW5	0.91	Moderate	Weak/No	Moderate	Weak/No	Yes
DOW012	CHW5	7.81	Moderate	Weak/No	Moderate	Weak/No	Yes
S048	CHW23	0.91	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S050a	CHS2	4.59	Moderate	Moderate	Strong	Weak/No	Yes
S050b	CHS2	3.35	Moderate	Moderate	Strong	Weak/No	Yes
S050b	CHS3	1.40	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S149	CHS3	0.25	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S157a	CHS3	1.72	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S157b	CHS3	1.38	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S173	CHS3	1.45	Weak/No	Weak/No	Weak/No	Weak/No	Yes
S178	CHS2	5.90	Moderate	Moderate	Strong	Weak/No	Yes
S178	CHS3	0.30	Weak/No	Weak/No	Weak/No	Weak/No	Yes
STAV019	CHW22	22.36	Moderate	Strong	Moderate	Moderate	No

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
STAV019	CHW24	13.78	Strong	Strong	Strong	Moderate	No
STAV020	CHW24	32.39	Strong	Strong	Strong	Moderate	No
STAV020	CHW25	22.59	Strong	Weak/No	Strong	Moderate	No

Key concerns

4.18 The fundamental intention of the creation of the Gloucester and Cheltenham Green Belt was to maintain separation between these two urban areas. The release from the Green Belt of land between Gloucester and Innsworth/Churchdown in the 2017 JCS in effect made the latter part of the same urban area as the former, and in so doing reduced separation between Gloucester and Cheltenham. It is in the vicinity of the A40 and rail links between the towns that the gap is narrowest but it is also fragile to the north where, although wider, it is weakened by intervening commercial development north of the airfield.

Impact of development of grey belt sites

4.19 The following sites lie in parcels identified as grey belt:

- CD1 – containing site CHU034 (1.22 hectares)
- CD3 – containing site CHU038 (4.58 hectares)
- CD4 – containing site CHU024 (49.43 hectares)
- CHS2 – containing site S050A (4.59 hectares) and part of sites S050B (3.35 hectares) and S178 (5.90 hectares)
- CHS3 – containing part of sites S050B (1.40 hectares) and S178 (0.30 hectares) and sites S149 (0.25 hectares), S157A (1.72 hectares), S157B (1.38 hectares) and S173 (1.45 hectares)
- CHW3 – containing site CHU021 (2.22 hectares)
- CHW5 – containing sites DOW005 (0.91 hectares) and DOW012 (7.81 hectares)
- CHW23 – containing site S048 (0.91 hectares)

4.20 Grey belt parcels are located adjacent to existing urban edges, and typically have a degree of containment from the core of the gap between towns. The potential for cumulative impact is a key consideration here, given the fragility of gaps, but for the sites listed above there is considered to be little potential for fundamental undermining.

4.21 Where separation between towns is narrowest, grey belt parcels CD3 and CHS2 and CHS3 occupy a substantial proportion of the gap; however, there is already significant urbanising influence from existing development in CHS2 and CHS3, and the proposed development in CD3 (site CHU038) would not extend the

edge of Churchdown any further east than existing development. The more substantial development proposed in parcel CD4 (site CHU024) is peripheral to the most fragile part of the gap and contained by the M5.

4.22 Other potential development sites are too small and/or too peripheral to the gap between towns to contribute to any significant risk of fundamentally undermining the Green Belt purposes.

Sites with potential to fundamentally undermine the purposes

4.23 There are no potential development sites in the core of the narrowest part of the gap but there is some potential for fundamental undermining to the north of this, where existing business/industrial park developments weaken separation between towns. A principal concern in the Staverton area would be with development of the western half of STAV019. Retaining a gap between Cheltenham and commercial development along the B4063 is important in preventing the chain of commercial sites west of the M5 from being perceived as sprawl of Cheltenham (Purpose A) and also weakening separation of towns (Purpose B).

4.24 Development of CHU015 alongside the western part of STAV019 would exacerbate the harm, by reducing the largest remaining gap between inset development areas along the B4063, giving a clear chance of this constituting a fundamental undermining. Development of CHU015 in isolation would be less likely to fundamentally undermine the purposes.

4.25 CHU039 in isolation is too closely associated with existing development to say that its development would fundamentally undermine the Green Belt purposes, and STAV024 is peripheral to the most fragile part of the gap. However, development of either in combination with the development of any of the other sites listed above would give potential for greater impact. The retention of regular gaps between the areas of commercial development and between the M5 and the edge of Cheltenham, with north-south views over open land that has limited urbanising influences, is important in retaining a perception of passing through development in countryside rather than going from one town into the other without a gap.

Between Gloucester and Cheltenham (south)

Figure 4.4: Sites and parcels between Gloucester and Cheltenham (south)

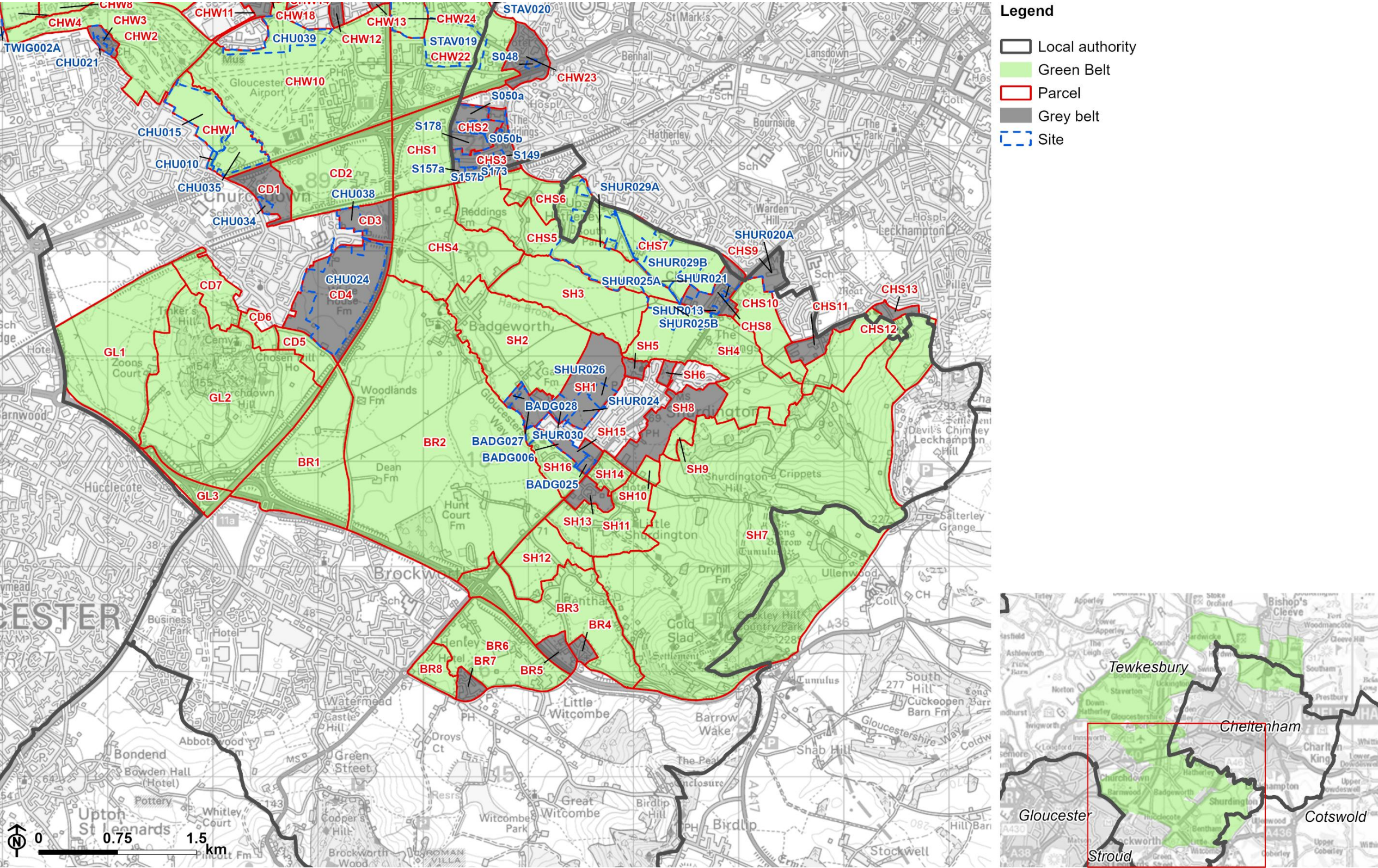


Table 4.4: Green Belt sites and parcels between Gloucester and Cheltenham (south)

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
BADG006	SH15	4.88	Moderate	Weak/No	Strong	Weak/No	Yes
BADG006	SH16	1.85	Strong	Moderate	Strong	Weak/No	No
BADG025	SH15	1.64	Moderate	Weak/No	Strong	Weak/No	Yes
BADG027	BR2	0.12	Strong	Strong	Strong	Weak/No	No
BADG027	SH1	6.33	Moderate	Moderate	Strong	Weak/No	Yes
BADG028	SH1	1.25	Moderate	Moderate	Strong	Weak/No	Yes
SHUR013	CHS8	0.45	Moderate	Weak/No	Moderate	Weak/No	Yes
SHUR020A	CHS9	7.59	Moderate	Weak/No	Moderate	Weak/No	Yes
SHUR021	CHS8	0.51	Moderate	Weak/No	Moderate	Weak/No	Yes
SHUR024	SH1	6.21	Moderate	Moderate	Strong	Weak/No	Yes
SHUR025A	CHS7	5.77	Strong	Weak/No	Moderate	Weak/No	No
SHUR025A	CHS8	1.18	Moderate	Weak/No	Moderate	Weak/No	Yes
SHUR025B	CHS5	4.12	Strong	Strong	Strong	Weak/No	No
SHUR025B	SH4	9.57	Strong	Strong	Strong	Weak/No	No
SHUR026	SH1	3.55	Moderate	Moderate	Strong	Weak/No	Yes
SHUR029A	CHS5	24.45	Strong	Strong	Strong	Weak/No	No
SHUR029A	CHS6	1.35	Strong	Moderate	Strong	Weak/No	No
SHUR029A	CHS6	1.41	Strong	Moderate	Strong	Weak/No	No
SHUR029A	CHS7	13.80	Strong	Weak/No	Moderate	Weak/No	No
SHUR029B	CHS7	32.43	Strong	Weak/No	Moderate	Weak/No	No
SHUR029B	CHS8	2.58	Moderate	Weak/No	Moderate	Weak/No	Yes

Site	Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Grey belt?
SHUR030	SH1	4.13	Moderate	Moderate	Strong	Weak/No	Yes

Key concerns

4.26 Retaining separation between Shurdington and the large built-up areas of Cheltenham and Gloucester, so that it does not in effect become part of one or the other, is important for avoiding a major impact on Purposes A and B. The gap between Shurdington and Cheltenham is the more fragile, but development that harmed the role of the A417 as a consistent urban edge to north-east Gloucester would also be harmful in this regard.

Impact of development of grey belt sites

4.27 The following sites lie in parcels identified as grey belt:

- CHS8 – containing sites SHUR013 (0.45 hectares) and SHUR021 (0.51 hectares), and part of sites SHUR025A (1.18 hectares) and SHUR029B (2.58 hectares)
- CHS9 – containing site SHUR020A (7.59 hectares)
- SH1 – containing part of site BADG027 (6.33 hectares) and sites BADG028 (1.25 hectares), SHUR024 (6.21 hectares), SHUR026 (3.55 hectares) and SHUR030 (4.13 hectares)
- SH15 – containing part of site BADG006 (4.88 hectares) and site BADG025 (1.64 hectares)

4.28 The sites identified as grey belt are either subject to significant urban influence and/or containment, or lie east or west of Shurdington, where development would not reduce the size of the gaps between Shurdington and either Cheltenham or Gloucester. As such, development of these in combination would have little potential to fundamentally undermine the Green Belt purposes.

Sites with potential to fundamentally undermine the purposes

4.29 The contiguous area of potential development comprising sites SHUR025A, SHUR025B, SHUR029A and SHUR029B amounts to almost 100 hectares. This is largely located to the west of the gap between Cheltenham and Shurdington, and to the east of the gap between Cheltenham and Churchdown, but there is some potential for fundamental undermining in two locations.

4.30 Firstly, expansion of Cheltenham to encompass site SHUR025B would leave fragile separation from Shurdington, to the detriment of Purpose A but also the wider Purpose B gap to Gloucester. The fields forming parcel SH4 are open in character,

with fairly weak hedgerow separation, and existing washed-over development to either side of the SA46 Shurdington Road also weakens the gap between urban areas. There is limited potential for landscaping measures to reduce impact of development on perceived separation between urban areas, given the narrowness of the gap and presence of existing dwellings along Shurdington Road.

4.31 Secondly, the south-western part of site SHUR029A is less than 750m from the washed-over village of Badgeworth, which in turn is a little over 1km by road from the edge of Churchdown. In isolation development here would have little potential to fundamentally undermine, but in combination with the expansion of Gloucester out to the M5 that would result from development of site CHU024 the loss of separation would be stronger, resulting in some potential to fundamentally undermine the separation of towns. Both sites have relatively strong outer boundaries, so there is limited potential for additional mitigation other than to limit the extent and scale of development to preserve a stronger sense of separation.

References

- 1 Ministry of Housing, Communities and Local Government published a revised version of the [National Planning Policy Framework](#) (August 2026).

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