

**Cheltenham Borough, Gloucester City and
Tewkesbury Borough councils' Strategic
and Local Plan (SLP)**

**Joint Urban Capacity Study
(UCS)**

August 2025

Strategic & Local Plan

Cheltenham, Gloucester & Tewkesbury

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1 Executive Summary

1. This joint Urban Capacity Study (UCS) has been prepared using data available at the time of production. It reflects the best information currently accessible within the individual UCS's regarding land availability, site constraints, and development potential. However, urban environments are dynamic and subject to ongoing change. As such, this study should be regarded as a snapshot in time and will require periodic review to ensure its continued relevance and accuracy. Future updates will incorporate more recent data, including outcomes from ongoing housing monitoring, updated HELAA site assessments, and any changes in planning policy or local circumstances.
2. An UCS is a realistic assessment of sites with potential to come forward for residential development within the urban areas of a Local Planning Authorities (LPA's) administrative boundaries. It provides evidence regarding options to meet housing needs.
3. This study is undertaken in the context of the emerging Strategic and Local Plan (SLP), fulfilling the joint LPA's duty to cooperate, with Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council working together to produce an appropriate development strategy and meet the area's needs.
4. This document was produced during the summer of 2025 bringing together the individual UCS's undertaken by the respective authorities.
5. This report establishes the overall SLP areas 'baseline capacity' which includes the urban capacity of Gloucester, Cheltenham and Tewkesbury's built-up areas as a starting point for the development scenarios introduced at Regulation 18 stage of the SLP.
6. This baseline capacity will help inform the most appropriate development strategy to take forward through the SLP.
7. The main finding is that the SLP area cannot meet its housing need by solely relying on its urban land. The SLP areas current housing need (as of March 2025) is 2,130 dwellings per annum (or 42,600 dwellings over a 20 year time frame) using the Standard Method in the National Planning Policy Framework (NPPF).
8. This report establishes that the total urban capacity in the SLP area is currently 18,018 dwellings and this figure largely consists of existing allocations and permissions. Based on this figure, even if all the current and potential sites were to come forward, it would meet under half of the overall requirement.
9. While each individual UCS has thoroughly examined existing and potential opportunities, the SLP authorities will remain proactive in identifying additional possibilities, which will be detailed in future updates to the urban capacity studies as new information emerges.

10. It is clear that the SLP will need to facilitate more development within the urban areas through the inclusion of robust policies that make the most effective use of land, higher densities and encouragement for densification and redevelopment.
11. In order to meet needs in full, it is also clear that in addition to the above, land outside the urban areas will need to be brought forward and effective joint working on the SLP will need to continue under the duty to cooperate
12. It will therefore be necessary to assess the areas outside of the main built-up settlements on greenfield land. In determining which locations outside the urban areas will be most suitable, a Green Belt Study will therefore need to be undertaken. Given the characteristics of the area, the majority of this greenfield land would likely fall within Tewkesbury Borough as the boundaries of Gloucester and Cheltenham are tightly constrained.
13. Therefore, the development strategy taken forward must include the baseline capacity determined, a continued impetus to enable further urban capacity to come forward and the identification of sustainable greenfield land to ensure that the needs of the SLP area can be met.

2 Introduction and Background

- 2.1 Since 2008, Cheltenham, Gloucester and Tewkesbury local planning authorities (LPAs) have worked together to produce a strategic plan covering their three areas. This resulted in the adoption of the Joint Core Strategy (JCS) in 2017, which provided an approach for how the three areas would develop.
- 2.2 Major changes have happened since then including the effects of a global pandemic and recognition of escalating climate change and ecological emergencies. The SLP takes an active role in managing change that has these principles at its heart.
- 2.3 In the summer of 2023, the SLP authorities agreed to produce a single plan rather than three separate plans to cover their respective administrative areas. The new plan will be called the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). Gloucestershire County Council has also joined the SLP as a partner.
- 2.4 The SLP will bring together four core elements – formerly the Gloucester, Cheltenham & Tewkesbury JCS and the local plans for each of those areas – under a single examination, setting out a long-term vision for development.
- 2.5 As part of the plan making process, it is imperative that housing needs are met in full across the SLP area. This is clearly set out within the NPPF and within the SLP authorities individual council strategies. Meeting needs in full will help ensure the plan is successful at examination, will assist in preventing speculative development and will help achieve and maintain healthy respective five year housing land supply¹ positions. To ensure that sufficient land is allocated within the plan to

¹ [As set out in the Planning Practice Guidance \(PPG\) on housing supply and delivery](#)

meet these needs a number of technical documents relating to site analysis need to be undertaken to robustly inform the process.

- 2.6 Based on the standard method for calculating housing need² the following figures need to be identified through both existing commitments and new housing supply as set out in figure 1 below:

Figure 1 – Housing Need

Council area	Annual need for new homes	20 year need for new homes
Cheltenham Borough	817	16,340
Gloucester City	696	13,920
Tewkesbury Borough	617	12,340
Total	2,130	42,600

- 2.7 The SLP authorities need to formulate the optimum development strategy to deliver the growth to meet the areas identified needs. In identifying this, a Regulation 18 (Issues and Options) consultation on Spatial Options and Key Policy Areas³ ran for eight weeks from 16th January until 13th March 2024. This presented six development scenarios for consideration. The SLP authorities have analysed responses to the consultation and are currently working on gathering evidence to shape the final development strategy options to take forward.
- 2.8 The six different development scenarios tested at Regulation 18 stage were:
1. Urban concentration
 2. Urban extensions
 3. Urban extensions, avoiding the Green Belt
 4. New strategic settlements
 5. Rural dispersal
 6. Sustainable transport
- 2.9 Through testing it was recognised that, on their own, none of the scenarios would deliver sustainable development and therefore the final strategy will likely be a combination of different elements.

² [Housing and economic needs assessment - GOV.UK](#)

³ [Strategic and Local Plan consultation](#)

- 2.10 However, as a starting point for all the scenarios, it is important to include all currently known site opportunities in the urban areas (also known as the ‘baseline capacity’). This is because it’s important to ensure that all brownfield / previously developed sites and those in urban areas are identified in the first instance, before then considering other options, including those on undeveloped / greenfield sites as well as Green Belt land. The baseline capacity includes the urban capacity of Gloucester, Cheltenham and Tewkesbury’s built-up areas as a starting point, along with urban extensions that are allocated or with planning permission.
- 2.11 This baseline capacity is determined through each UCS and will be periodically reviewed so that the most up to date figures are factored into the plan making process.

3 National Planning Policy Framework (NPPF)

- 3.1 In recent decades successive governments have encouraged a ‘brownfield’ before ‘greenfield’ agenda through the NPPF with the understanding that this has strong support from local communities in both rural and urban areas.
- 3.2 Amendments to the NPPF made in December 2024 removed the opportunity set out in the previous version for LPAs to deviate from the use of minimum density standards if a development would be considered out of character with surrounding densities. This change demonstrates that the government wish to make the most effective use of land through the use of appropriate densities, and this will be reflected in the site analysis workstreams of the SLP going forward.
- 3.3 Paragraph 89 of the NPPF states “...*The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist*”.
- 3.4 Paragraph 124 of the NPPF states “*Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”.
- 3.5 Paragraph 125 of the NPPF states: “*Planning policies and decisions should:*
- a) encourage multiple benefits from **both urban and rural land**, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
 - b) recognise that some **undeveloped land can perform many functions**, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
 - c) **give substantial** weight to the value of using suitable brownfield land within settlements for homes and other identified needs, **proposals for which should be***

approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification”.

3.6 The updated NPPF also introduces the term ‘grey-belt’, which is defined as: “*land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes*”. Section 13 of the NPPF allows the redevelopment of grey-belt land where benefits can be demonstrated. Paragraph 148 makes it clear that where it has been concluded that it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey-belt land that is not already previously developed, and only then consider other sustainable Green Belt locations.

3.7 In any case there is a requirement for LPAs to review their Green Belts. The SLP recognises this requirement and are currently in the process of commissioning a Green Belt review for the SLP area.

3.8 Paragraph 155 requires that where major development takes place on land which has been released from the Green Belt, the following contributions should be made:

“a) affordable housing which reflects either:

(i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or

(ii) (ii) until such policies are in place, the policy set out in paragraph 157 below;

b) necessary improvements to local or national infrastructure; and

c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality

green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces”.

- 3.9 These are referred to as the ‘golden rules’ and changes in this regard will also be factored into the site analysis work, especially when considering the deliverability and developability of sites.

4 Corporate Objectives

- 4.1 It is also important to ensure that any site analysis work reflects locally important strategic objectives that are set out within published corporate documents where the aims and objectives are components that are within the remit of the SLP. The LPA authorities' respective corporate council plans / strategies each contain objectives based around the provision of new homes and how these will be delivered.
- 4.2 Within Tewkesbury Borough Councils ‘Council Plan’ (2024 – 2030)⁴ the focus on ‘Managing growth’ is concerned with planning for the building of new homes, through the SLP, rather than letting development take place in an ad hoc manner. The ‘Managing Growth’ focus highlights the importance of ensuring that the necessary infrastructure is secured to support growth requirements. One of the actions is to work with providers to prepare an Infrastructure Delivery Plan, as part of the evidence base that informs the preparation of the SLP and to support both the SLP and the Garden Communities Charter that concerns the new Tewkesbury Garden Community.
- 4.3 ‘Housing and homelessness’ is a further area of focus for Tewkesbury with preventing and resolving homelessness a key part of this, along with the recognition of the importance of affordable housing. One of the actions is to identify housing needs across the borough through the SLP. They will seek to increase numbers of affordable houses, provide options in areas less likely to see wider development and explore options for the council to begin to deliver affordable housing on their brownfield land.
- 4.4 Cheltenham Borough Councils ‘Corporate Plan’ (2023 – 2027)⁵ includes key priority 3 – Affordable homes, which is concerned with increasing the number of affordable homes through their £180m housing investment plan, from which £35m has already been spent delivering 136 homes. The Borough Council state that they will continue to take a ‘fabric-first’ approach with improvements to existing homes, ensuring they are as energy efficient as possible. In meeting this priority, they also aim to enable development and regeneration opportunities to support more town centre living.
- 4.5 One of Gloucester City Council’s priorities within their Corporate Plan (2025 -

⁴ [Council Plan 2024-2030 - Tewkesbury Borough Council](#)

⁵ [Our corporate plan | Cheltenham Borough Council](#)

2028)⁶ ‘Putting the heart back into Gloucester’ is to ensure that all residents have somewhere to call home. To achieve this, they have a set of promises including delivering more council homes, supporting neighbourhood regeneration, reducing the number of empty homes and the provision of more funding to tackle homelessness.

- 4.6 The UCS’s have had regard to the above corporate objectives in consideration of the types of urban land to be assessed.

5 Purpose of the Urban Capacity Study

- 5.1 The purpose of this joint UCS is to provide an overview of the methodology the individual LPAs used to determine their own urban capacities. It will use the individual results to summarise the realistic and potential urban housing capacity in the SLP administrative areas. The study is intended to consider urban opportunities that could contribute towards the development needs and growth over the SLP period to 2041 (and beyond).
- 5.2 This study focuses on residential development because separate retail and employment studies will be undertaken as part of the evidence base for the plan-making process.
- 5.3 It is important to robustly consider urban capacity across all three administrative areas in order to understand any future development needs that may need to be planned for outside of the urban areas.
- 5.4 National policy places great emphasis on the efficient use of urban land. It is a key component of sustainable development and an important priority for local people when faced with the potential loss of greenfield land. The purpose of undertaking a UCS is to provide evidence to help reduce the need for development on land beyond built up areas as far as is feasible / available.
- 5.5 Determining urban capacity is an iterative process, and the first version of this report will help inform the development strategy to provide an accurate analysis of urban capacity and the baseline position for the differing development scenarios. Capacity within the administrative area will likely change over time however and it may be necessary to update this study alongside key SLP stages.
- 5.6 The UCS’s are produced as an exercise that helps understand potential urban housing capacity, subject to the application of policy and the conclusions of more detailed subsequent site assessment work and other streams of evidence that inform the process.

6 How the UCS’s fit in with other evidence sources

⁶ [Corporate Plan 2025 to 2028 | Gloucester City Council](#)

- 6.1 In coming to the development strategy that best meets the needs of the SLP area, it is imperative it is informed by robust evidence. This evidence base will inform the draft SLP in terms of subsequent housing allocations that will be taken forward to examination.
- 6.2 Evidence informing site analysis that has been or is currently being collated that has been undertaken to complement one another includes the following:
- i. Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA)⁷;
 - ii. Habitats Regulations Assessment (HRA)⁸;
 - iii. Housing and Employment Land Availability Assessment (HELAA)⁹;
 - iv. Brownfield Registers (BR)¹⁰;
 - v. Design Coding (DC);
 - vi. Settlement Hierarchy (SH); and
 - vii. Site Allocations Topic Paper (SATP)
- 6.3 Underpinning all evidence bases for the plan-making process is the SA (incorporating SEA). This is a statutory requirement and is designed to assess the impacts of the plan against the “reasonable alternatives” to that plan and considers the social, economic and environmental performance against set sustainability objectives.
- 6.4 Alongside the SA / SEA, the SLP have been through the initial Habitats Regulations Assessment (HRA) process, which is iterative and designed to run alongside and inform plan making. The HRA is undertaken to ensure adverse impacts on habitats sites are avoided in the first instance through strategic planning of options or, where this is not possible, effective mitigation which is designed to ensure no adverse impact on site integrity. The purpose of the HRA undertaken was to inform the development of the SLP at the Regulation 18 stage of the plan making process. It provided screening of the draft vision and strategic objectives and growth, development and strategic policy options and set out further stages of HRA work that will be required at future stages of the SLP process.
- 6.5 The HELAA is an important evidence base study that provides the starting point in the housing site selection process for the emerging SLP. It also helps inform wider decisions on the quantum of greenfield land and Green Belt release the SLP authorities will have to consider if they are to meet their local housing need and achieve healthy respective 5-year housing land supply positions.

⁷ [Final SA Scoping Report](#) and [Regulation 18 SA](#)

⁸ [Habitats Regulation Assessment of the SLP](#)

⁹ Available on individual LPA’s websites

¹⁰ Available on individual LPA’s websites

- 6.6 The purpose of the HELAA is to assist in identifying suitable land which is available for housing and economic development to meet identified needs; to consider the development potential and to estimate when a development could occur.
- 6.7 Any sites that are identified within the individual UCS's to have realistic potential will subsequently feed into the HELAA assessment process to further determine their suitability, availability and achievability. Subsequently if the sites are viewed positively in the SA / SEA, HRA and HELAA and are in line with the final development strategy they may be taken forward as allocations within a future SATP.
- 6.8 The SLP were selected by the Ministry of Housing, Communities and Local Government (MHCLG) to become a pathfinder joint local authority area for design codes. The design code will be a framework for creating healthy, safe, green, environmentally responsive, sustainable and distinctive places, with a consistent and high-quality standard of design.
- 6.9 The purpose of the design code is to ensure that the three LPA areas that each have distinct built and landscape characters and history are protected. It is vital that future development reflects the strengths and unique character of these individual areas.
- 6.10 Since 2017 it has been a requirement under planning legislation for LPAs to prepare, maintain and publish registers of previously developed (brownfield) land within their administrative areas. Brownfield sites that meet the relevant criteria must be entered in Part 1 of brownfield land registers. Relevant criteria includes that the land is large enough to accommodate residential development (0.25ha or more) and that it is suitable, available and achievable for residential development.
- 6.11 Part 2 of the register is only for those sites in Part 1 that the LPAs have decided would be land suitable for a grant of 'permission in principle' for residential development under Article 4 of the [Town and Country Planning \(Permission in Principle\) Order 2017](#). At this point in time the three SLP authorities have not identified sites to be put forward into Part 2 of the Register. The registers have however informed the UCS's in forming one of the categories that were assessed for future development potential.
- 6.12 The settlement hierarchy, which is currently referred to in the JCS (Policy SD2 – Retail and City / Town Centres, and Table SP2c: Settlement Hierarchy) will be updated as part of the SLP process but currently divides settlements across the SLP area into four levels:
- i. 2 Key Urban Areas;
 - ii. 1 Market Town;
 - iii. 2 Rural Service Centres; and
 - iv. 12 Service Villages
- 6.13 In accordance with government guidance and to ensure development is as sustainable as possible, the settlement hierarchy will be used to inform the HELAA assessments of individual sites. Growth will subsequently be directed to those areas

with high scores or where their scores could be improved through the facilitation of development. The development strategy in turn determines the settlement hierarchy.

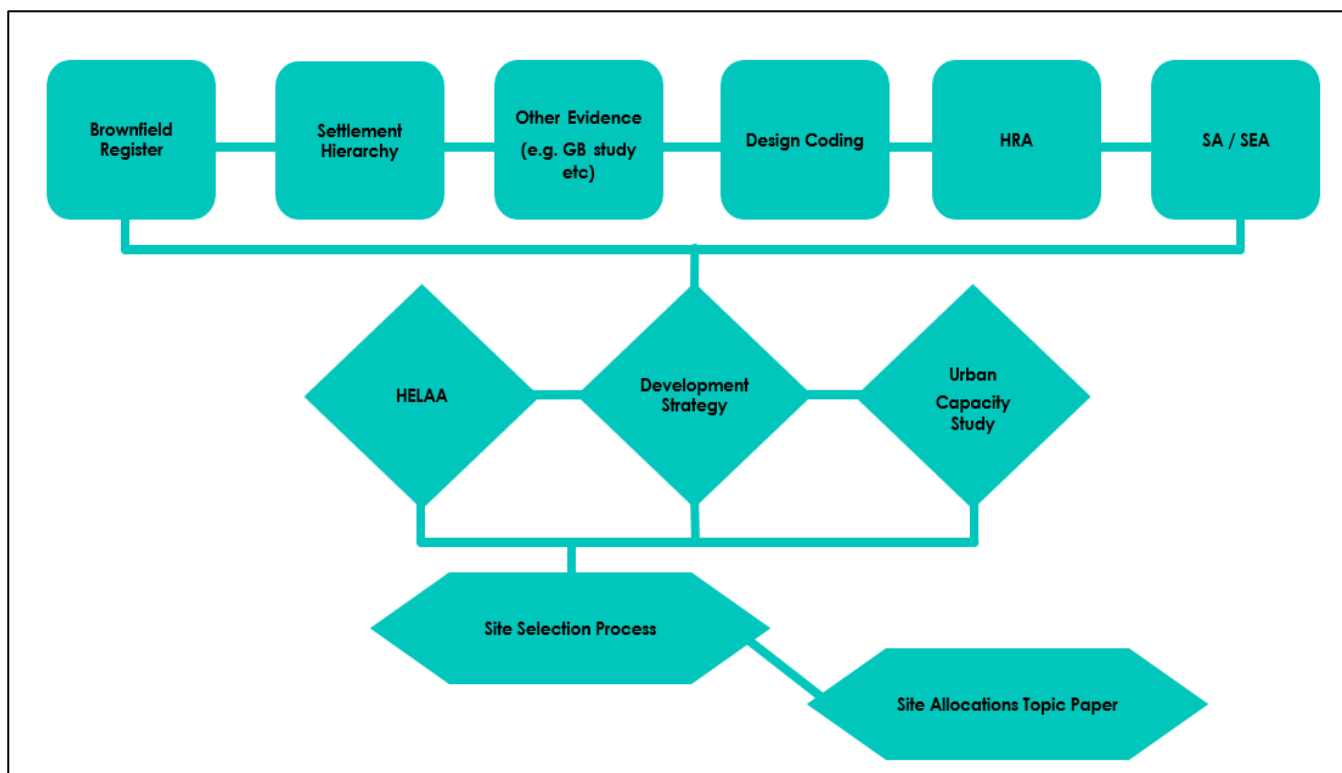
6.14 The above sources of evidence will be used to inform the drafting of a SATP that will set out specific sites to be taken forward as allocations to meet the SLP area's needs.

6.15 These allocations will feature in the final SLP. However, even if a site is allocated through the SLP process, planning permission will still be required to develop the land. When submitted they will be further scrutinised and assessed against the new development management policies. These will contain criteria to ensure that any sites brought forward are developed in a sustainable manner, are of high quality and good design and that they bring with them the necessary infrastructure.

6.16 Many more streams of evidence are either being scoped or are under way that will also feed into the site analysis work including, for example, a new Strategic Flood Risk Assessment, sustainable transport evidence, housing density analysis work and a review of the SLP areas Green Belt and high quality landscapes.

6.17 The visual below illustrates how the site analysis evidence all fits together to inform the shaping of the SLP:

Figure 2 – Visual representation of linked evidence sources



7 About the UCS's

- 7.1 The UCS's assess realistic and potential capacity in the administrative areas of Gloucester City, Cheltenham Borough and Tewkesbury's urban areas to contribute towards development needs over the SLP plan period.
- 7.2 Determining urban capacity is central to the SLP's environmental sustainability as it is important to maximise the capacity of urban areas to accommodate growth. In addition to protecting the countryside, it also considers densification, including intensification of sites and more compact neighbourhoods, and this will consequently reduce travel distances and associated emissions.
- 7.3 NPPF paragraph 130a) states that: *"plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate"*.
- 7.4 The UCS's provide the data to evidence that all known urban development potential within the SLP area has been considered and what the potential capacity might be. Any sites that have potential will feed into the HELAA assessment process to further determine their suitability, availability and achievability. Subsequently if the sites are viewed positively in the SA and HELAA and are in line with the final development strategy then they may be taken forward as allocations within the SATP.

8 Methodology

- 8.1 Each SLP authority completed their own area-wide UCS that broadly followed the same methodology, split into four distinct stages as follows:
- i. Stage 1 – Defining the study area and site thresholds;
 - ii. Stage 2 – Identifying sources of sites;
 - iii. Stage 3 – Determining Potential; and
 - iv. Stage 4 – Conclusions and recommendations.

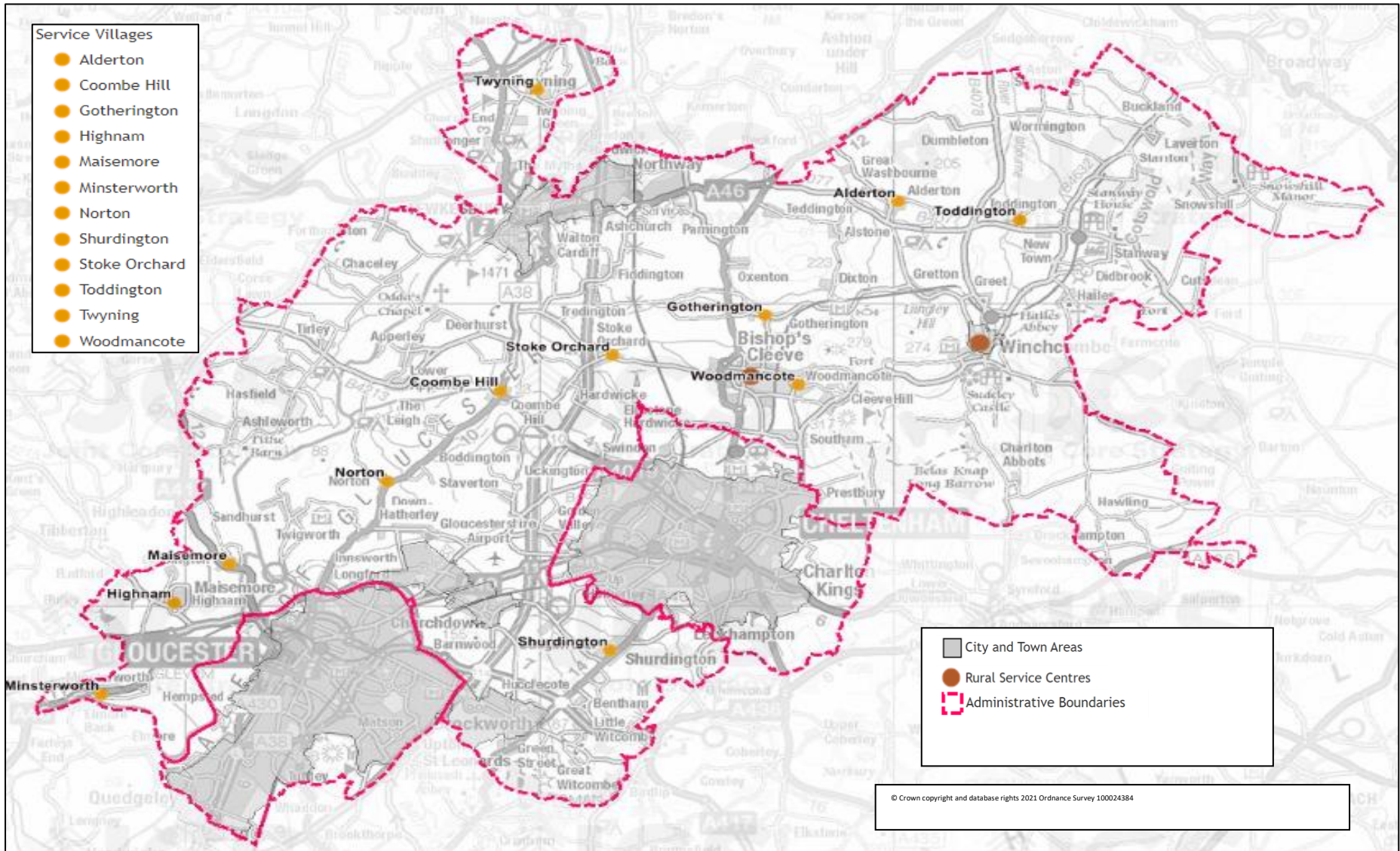
Stage 1 - Defining the study area and site thresholds

- 8.2 The individual UCS's assess the two key urban areas of Gloucester City and Cheltenham, along with the market town of Tewkesbury. In addition, the two rural service centres of Bishops Cleeve and Winchcombe and the 12 service villages set

out in the current settlement hierarchy are also considered. Finally, any other sites that fall within the definition of previously developed or brownfield land or are considered to fall within, or will be within, a built-up area are also assessed.

- 8.3 Figure 3 illustrates the areas / settlements that are considered. Only where sites are identified (see stage 2) were settlements included within the conclusions and recommendations (see stage 5).

Figure 3 – Areas / settlements considered in the UCS's



- 8.4 Within the Study Area defined it was important to define the site thresholds that will be applied for assessment within each UCS. For the purposes of land availability assessments, the [Planning Practice Guidance Housing and economic land availability assessment \(HELAA\)](#) advocates the use of a threshold of sites for 5 or more dwellings (Para: 009 Reference ID: 3-009-20190722). Following a review of the HELAA methodology the SLP will apply these thresholds to its land availability assessments. It therefore follows that a threshold of 5+ dwellings was used within each UCS in terms of new sites coming forward. This enables a more manageable assessment and is also better aligned to the likely minimum size of potential allocations through the SLP.
- 8.5 For clarity, generally sites capable of delivering five or more dwellings within the urban areas of Gloucester City, Cheltenham Borough, Tewkesbury town, the two rural service centres and the 12 service villages identified in the settlement hierarchy and other sites considered to be previously developed, on brownfield land or those that are, or will be, within a built-up area were assessed through the UCS's.

Stage 2 - Identifying sources of sites

- 8.6 Sources of sites were split into two categories - **current** and **potential** sources. Current sources of supply are those sites that are already in the planning system and these may include:
- i. Supply from Detailed planning permission;
 - ii. Allocated supply within respective adopted Development Plans¹¹;
 - iii. Sites within existing HELAA's; and
 - iv. Potential supply from sites on each SLP authorities Brownfield Land Register (Part 1).
- 8.7 Potential sources of supply do not have the certainty of the current sources of supply that are committed (i.e. already have planning permission) or allocated sites. However, the purpose of each UCS is to fully understand the **potential** capacity and for this assessment the following sources were explored (where relevant to each SLP authority):
- i. Housing Strategy opportunities including long term vacant properties;
 - ii. Council owned sites;
 - iii. Other publicly owned sites;
 - iv. Potential HELAA sites;

¹¹ Where existing allocations are outside of defined settlement boundaries these will be included within the UCS.

- v. Officer and Member identified sites not identified elsewhere;
- vi. Regeneration sites (including intensification of existing areas);
- vii. Town centre repurposing;
- viii. Small sites 'windfall' allowance;
- ix. Long term vacant properties, and
- x. Vacant and/or derelict land or buildings.

Stage 3 – Determining Potential

- 8.8 The UCS's seek to assess in detail the 'availability' of sites to ascertain whether a particular site will be able to deliver dwellings within the plan period to assist in meeting the housing requirements of the SLP area.
- 8.9 The call for site proforma produced for the HELAA was able to capture the land availability information required for the UCS's (see Appendix 4). In addition, for sites with planning permission, a request for developers to inform their sites individual build out rates and trajectory information was sent to inform the respective 5 year housing land supply position statements. For other sites not submitted through the call for sites process or larger sites with the benefit of planning permission, the availability and deliverability information was defined using planning history, officer knowledge, information from other sources; such as meetings with key colleagues in other departments (e.g. council property / asset management teams) and existing plans and strategies.
- 8.10 The call for site pro-forma was designed to establish whether a site is available for residential development and whether such development would be likely to take place within the plan period. The trajectory request form was used to ascertain information about the likely timescales in which development will be delivered on sites with planning permission (see appendices 5, 6, & 7).
- 8.11 Using Geographic Information System (GIS) software and the HELAA spreadsheet, all sites within the defined settlements above the threshold were selected for further analysis through each UCS.
- 8.12 Following the identification of sites for inclusion within the UCS's, a review of the site's history was undertaken. This stage enabled officers to establish if any of the sites identified had been subject to planning applications or pre-application submissions.
- 8.13 The information gathered from the call for sites pro-forma's, brownfield land registers and trajectory forms were used to help determine land availability and deliverability for each site where this information was received or available. Meetings with colleagues, officer knowledge and other sources of site information, including councils plans and strategies were also used to determine if a site was

likely to offer potential for residential development within the SLP timeframe.

- 8.14 Where there was no information or very limited information on a potential site it was assumed that the site would be unlikely to contribute to the potential urban capacity within the SLP area at this time.
- 8.15 Officers used the above information in order to make a judgement on the potential urban capacity of each site or relevant settlement. Each site was assessed using the information gathered through the survey and information already assessed through the HELAA with a conclusion being made as to the likelihood of a site being able to contribute to the urban capacity of the SLP area.

Stage 4 - Conclusions and Recommendations

- 8.16 The respective SLP authorities individual UCS reports were completed following each of the stages set out above and with capacity conclusions included. These reports are set out at Appendices 1, 2 and 3 to this document.
- 8.17 Conclusions were made in the LPAs individual reports, to inform the overall capacity for this joint UCS report, following completion of the assessment work and collation and analysis of the potential UCS sites.

9 Overall Conclusions and Recommendations

- 9.1 This joint UCS reports on the findings of the individual UCS undertaken by the respective LPAs within the SLP area. It provides the data to evidence that all urban development potential, in its many forms, has been considered and any realistic and potential capacity has been highlighted to inform the baseline capacity. Any sites that have potential and not already assessed through the HELAA will feed into the HELAA assessment process to further determine their suitability, availability and achievability.
- 9.2 The SLP areas current housing need is 2,130 dwellings per annum (or 42,600 dwellings over a 20 year time frame) using the Standard Method in the NPPF (see figure 1).
- 9.3 Figure 4 below details the overall urban capacity of the SLP area based on the results of the individual UCS's undertaken:

Figure 4: Overall urban capacity in the SLP area

LPA	Source of Supply	Indicative dwellings (net capacity)
Cheltenham	Current Supply	7,487

	Potential Supply	750
Gloucester	Current Supply	6,782
	Potential Supply	1,102
Tewkesbury	Current Supply	1,420
	Potential Supply	477
Total SLP Urban Capacity		18,018

- 9.4 These figures demonstrate that the SLP cannot meet its housing demand by solely relying on urban land within its administrative boundaries. The urban capacity identified would currently meet under half of the overall need (or 900 dwellings per annum) even if all current and potential sites were to come forward within the plan period.
- 9.5 Therefore, to meet the SLP areas needs in full, further evidence is required in terms of a Green Belt Study. This will determine if there are any parcels of land that could be released for development, particularly taking into consideration any 'Grey Belt' land deemed suitable to help meet the need across the SLP area. In addition, effective joint working on the SLP will need to continue under the duty to cooperate. The appropriate development strategy will need to take into account the baseline capacity established within the Cheltenham, Gloucester and Tewkesbury administrative boundaries.
- 9.6 Inevitably, based on the results of the UCS's undertaken, it is clear that land outside the urban areas will need to be identified as part of the development strategy and given the characteristics of the area the majority of this would fall within Tewkesbury Borough given the existing constrained boundaries of Gloucester and Cheltenham.

Appendix 1: Gloucester City UCS

Appendix 2: Cheltenham Borough UCS

Appendix 3: Tewkesbury Borough UCS

Strategic & Local Plan

Cheltenham, Gloucester & Tewkesbury

Housing and Economic Land Availability Assessment (HELAA)

Site Submission Form

The three partner planning authorities of Cheltenham, Gloucester and Tewkesbury are required to carry out assessments in their areas of the suitability and availability of land for a variety of uses in accordance with National Planning Practice Guidance.

This process helps the planning authorities understand the amount and type of development we could potentially deliver through the Strategic Local Plan area, and how future needs can be met. To inform the HELAA we sometimes carry out a formal 'call for sites', but the authorities accept the sites submitted at any time. These sites will be collated and assessed, and the results will be published periodically in HELAA Reports.

Please use this form to provide information on sites in Cheltenham Borough, Gloucester City and Tewkesbury Borough that you would like to suggest for future development. Most sites received will be for housing or economic / employment use, but if you have sites that you would like to be considered for environmental or recreational uses such as Suitable Alternative Natural Green Space (SANG) or for Biodiversity Net Gain (BNG) then please submit these also.

It is important that the form is filled in correctly and comprehensively to aid the local authorities in their assessments. Please note that not all sites we receive will be considered appropriate to be included within future planning policy documents/plans. This is particularly the case where a site is small or heavily constrained.

All submissions must be accompanied by a **map or a GIS shapefile** showing a red lined site boundary. The map should be at a legible scale and have an Ordnance Survey base. For each site submitted a separate form and map will be required.

Please submit this completed form to: info@strategiclocalplan.org



Date Form Submitted	Your Site Reference Number
	The Local Authority's Site Reference Number (if known)

Site Owner Details	Site Agent Details
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Title	<input type="text"/>	Title	<input type="text"/>
First Name	<input type="text"/>	First Name	<input type="text"/>
Last Name	<input type="text"/>	Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>	Address Line 1	<input type="text"/>
Line 2	<input type="text"/>	Line 2	<input type="text"/>
Line 3	<input type="text"/>	Line 3	<input type="text"/>
Line 4	<input type="text"/>	Line 4	<input type="text"/>
Post Code	<input type="text"/>	Post Code	<input type="text"/>
Telephone Number	<input type="text"/>	Telephone Number	<input type="text"/>
Email address	<input type="text"/>	Email address	<input type="text"/>

I am... (please select from the list)	
Owner of the site	Planning Consultant
Parish Council	Land Agent
Local Resident	Developer
Amenity/Community Group	Registered Social Landlord
Other (please specify):	

Land Use and Planning (please describe)	
Current use of the site (e.g. Vacant or derelict, agriculture, employment etc. include use class if known)	
Land ownership details	

(Are there multiple owners, covenants or other complexities which the local authority should be aware of?)	
Past uses	
Current planning status (Include reference numbers if known)	
Relevant planning history	
Developer interest/option on land	

Site Information	
Site location (Name, address and postcode)	
Grid reference (Eastings and northings)	
Parish or ward	
Total site area (Hectares)	
Developable area (Hectares)	
Has the site been previously considered? (Provide reference if known)	
Has the site been developed before? (Greenfield / brownfield)	
Existing trees, landscape and wildlife features on the site	
Access to the site (Vehicle and pedestrian access from an adopted highway and proximity to cycle paths)	
Public transport access and accessibility	
Local facilities (e.g. Availability of shops, schools, pubs, healthcare, employment etc.)	
Local character and surrounding land uses	

Constraints to Development and Site Availability (is there anything restricting development potential?)

Designations (e.g. Green Belt, AONB, SSSI, Special Landscape Area or other Local Plan policy designation?)		
Historic features (e.g. Listed buildings, conservation area, archaeology or Scheduled Monuments?)		
Flooding (Is the site in Flood Zone 2 or 3a or 3b? Additionally please provide information on surface or groundwater flooding if available)		
Minerals & waste sites (Are there minerals or waste sites, facilities or safeguarded areas on site or in proximity?)		
Other (e.g. Contamination, Public Rights of Way, potentially problematic current or past uses)		
Proposed Future Uses and Capacity		
Use (if mixed use, please tick all that apply)	Yes	Basic Information – area/number of units/proposed floorspace/number of pitches
Residential		
Affordable housing		
Housing for older people or a specific group with specific needs		
Self-build or custom build housing		
Offices, research and development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Retail (please specify)		
Community facilities (please specify)		
Cultural facilities (please specify)		
Sports/leisure (please specify)		
Gypsy and Traveller site or Travelling Showpeople plot		
Open space		

Waste management		
Energy generation		
Site for Suitable Alternative Natural Greenspace (SANG)		
Site for off-site Biodiversity Net Gain (BNG)		
Site for Nature Recovery / Conservation		

Timescales and Phasing		
When will the site be available?	Yes	Why?
Immediately		
0 to 5 years		
6 to 10 years		
11 to 15 years		
More than 15 years		

Brownfield Land Register
<p>If the submitted site is:</p> <ul style="list-style-type: none"> - A brownfield site i.e. 'previously developed land' - At least 0.25 ha in size or capable of supporting at least 5 dwellings <p>You may wish it to be considered for registration on the Council's Brownfield Land Register. If this is the case please go to the Brownfield Land Register pages of the Local Planning Authority in which your site is located and submit the appropriate form.</p>

GDPR / How we will manage and store the information provided
<p>Tewkesbury Borough Council is the lead authority for the SLP, so the way we use personal information is consistent with their data protection practices. You can find out more on their website.</p> <p>You have certain rights over the information we hold about you. Below we explain what your rights are and how you can exercise these rights. If you want more information, please contact us.</p> <p>Tewkesbury Borough Council has appointed a data protection officer whose job is to ensure that the council complies with the data protection legislation. If you have any queries regarding compliance, you can contact the data protection officer at dpo@teiwkesbury.gov.uk.</p>

Appendix 5: Trajectory Request Form - Gloucester


Dear xxx,

IMPORTANT PLANNING INFORMATION NEEDED (for sites of all sizes)

Annually, Gloucester City Council is required to demonstrate that there is a deliverable supply of new homes to meet housing needs over the next five years. To this end, we are contacting you to gain an up to date picture of anticipated delivery rates on major sites – those with planning permission and/or those allocated for housing development.

We would be grateful for your assistance with providing accurate information on delivery and any issues which may affect delivery.

Please see the below table. We would appreciate it if you could provide / update the trajectory for the next five years (2024/25 to 2028/29). Note each year runs from 1 April to 31 March the following year (not calendar years). Dwellings are counted as ‘complete’ when they are water tight.

Site name:					
Reference:					
Address / location:					
Net dwellings:					
Trajectory (completions anticipated)					
					
2024/25	2025/26	2026/27	2027/28	2028/29	Later

We would also be grateful for your answers, including an explanation, to each of the questions below as applicable.

1. Is the site in multiple ownership?

2. Is the site in the ownership of a developer, or subject to any other form of developer interest?

3. Does the developer intend to develop this site for residential use within the next 5 years?

4. Where applicable please provide details of progress / anticipated timescales for submission of planning application(s) (full/outline/reserved matters as applicable)

5. Are there any issues relating to viability that may delay or prevent development coming forward on this site?

6. Are there any issues relating to housing demand/market conditions in the area that may delay or prevent development coming forward on this site?

7. Any other issues to resolve that may affect the lead-in period/delivery timescales for the site?

Please provide a response by Monday 1st July 2024. If this deadline is likely to cause any issues please let us know.

The information you provide will assist the Council in confirming the housing land supply and housing trajectory for Gloucester City Council. Please note that it will be published as part of the authority's housing monitoring reports in accordance with the Council's data protection policies.

If you have any questions or queries relating to this request please do not hesitate to contact us.

Thank you for taking the time to provide this information. Please note, if we do not receive a response then the Local Planning Authority reserve the right to estimate a reasonable build trajectory based on similar local examples or industry norms.


Appendix 6: Trajectory Request Form – Cheltenham

IMPORTANT PLANNING INFORMATION NEEDED (for sites over 100 dwellings)

Annually, Cheltenham is required to demonstrate that there is a deliverable supply of new homes to meet housing needs over the next five years. To this end, we are contacting you to gain an up to date picture of anticipated delivery rates on major sites – those with planning permission and/or those allocated for housing development.

We would be grateful for your assistance with providing accurate information on delivery and any issues which may affect delivery.

Please see the below table. We would appreciate it if you could provide / update the trajectory for your Cheltenham sites for the next five years (2024/25 to 2028/29). Note each year runs from 1 April to 31 March the following year (not calendar years). Dwellings are counted as ‘complete’ when they are water tight.

Site name:					
Reference:					
Address / location:					
Net dwellings:					
Trajectory (completions anticipated)					
					
2024/25	2025/26	2026/27	2027/28	2028/29	Later

We would also be grateful for your answers, including an explanation, to each of the questions below as applicable.

1. Is the site in multiple ownership?

2. Is the site in the ownership of a developer, or subject to any other form of developer interest?

3. Does the developer intend to develop this site for residential use within the next 5 years?

4. Where applicable please provide details of progress / anticipated timescales for submission of planning application(s) (full/outline/reserved matters as applicable)

5. Are there any issues relating to viability that may delay or prevent development coming forward on this site?

6. Are there any issues relating to housing demand/market conditions in the area that may delay or prevent development coming forward on this site?

7. Any other issues to resolve that may affect the lead-in period/delivery timescales for the site?

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Please provide a response by **Monday 8th July 2024**. If this deadline is likely to cause any issues please let us know.

The information you provide will assist the Council in confirming the housing land supply and housing trajectory for Cheltenham Borough Council and will feed into the evidence base of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan. Please note that it will be published as part of the authority's housing monitoring reports in accordance with the Council's data protection policies.

If you have any questions or queries relating to this request please do not hesitate to contact daniel.oneill@cheltenham.gov.uk.

Thank you for taking the time to provide this information. Please note, if we do not receive a response then the Local Planning Authority reserve the right to estimate a reasonable build trajectory based on similar local examples or industry norms.

Tewkesbury Borough Council: Housing Land Supply Questionnaire (for sites of 10+ dwellings)

Tewkesbury Borough Council is subject to the Freedom of Information Act 2000 and Environmental Information Regulations 2004, and laws concerning the protection of personal information. If you consider that any of the information that you provide as part of your response is commercially sensitive or personal information, please identify it as such in Question 9.1 and please explain in question 9.2 how disclosure would be detrimental to your organisation. The council cannot guarantee non-disclosure of this information, but will apply any relevant exemption where one is clearly engaged.

1. Site Details		
1.1	Application / Site Reference.	
1.2	Site Address.	
2. Planning Status (Please place an 'X' in the row that best describes the planning status of the site and add the relevant application/reference number. If an application has been submitted, but not yet determined, please include details)		
2.1	Full permission.	
2.2	Reserved Matters permission.	
2.3	Outline permission.	
2.4	Hybrid permission.	
2.5	Resolution to grant permission.	
2.6	Allocated in the development plan.	
2.7	Draft allocation in the development plan.	
2.8	Prior Approval.	
2.9	Grant of Permission in Principle.	
2.10	Identified on the Brownfield Register.	
2.11	Covered in a Supplementary Planning Document	

3. Ownership

(please place an 'X' in the row that best describes you or your clients legal interest in the site), and answer any supplementary question

3.1	You or your client(s) are the sole landowner(s).	
3.2	You or your client(s) are part landowner(s).	
3.3	You or your client(s) have an option on the land.	
3.4	If the site is subject to an option please provide details, e.g. the notice required to gain vacant possession, the length of the option, etc.	
3.5	Is the site being marketed or advertised for sale as available for a non-residential use? If so, please provide details.	
3.6	Other, please specify.	

4. Existing use / Tenancy

(please answer 'yes' or 'no' and provide details)

4.1	Is the site currently in use or vacant? If in use, please provide a brief description.	
4.2	Is the current use linked to you or your client?	
4.3	Is the site subject to a tenancy or tenancies?	
4.4	If the site is subject to a tenancy or tenancies please provide outline information on the length of the tenancy and any break clauses.	
4.5	Has agreement been reached with tenants to cease use of the site, and if so when?	

5. Progress towards delivery (Outline permissions) (please provide details)		
5.1	If the site has outline permission, when do you plan to submit a Reserved Matters application?	
5.2	Are you undertaking site assessment work? If so, please provide details including the timetable for this completion.	
5.3	If the site has outline permission, but you have or intend to submit an application for full permission rather than for Reserved Matters, please explain why.	
6. Progress towards delivery (Other planning status) (please provide details)		
6.1	If the site has a resolution to grant permission, when do you expect to receive permission?	
6.2	If the site has planning permission, when do you expect to complete discharging pre-commencement conditions?	
6.3	If the site is allocated in the development plan, when do you plan to submit an application for permission? Will you be seeking outline or full permission?	
6.4	If the site has a grant of Permission in Principle or is identified on the Brownfield Register, when do you expect to have full consent to develop?	
6.5	If the site is in multiple ownership / control, are the interests of all parties aligned?	
6.6	Is up-front infrastructure required before new homes can be built?	

7. Achievability (please answer 'yes' or 'no' and provide details)		
7.1	Are there current barriers delaying / preventing development? Please explain what they are and how/when they will be overcome.	
7.2	Do you consider that development for the proposed use(s) of the site is viable having regard to current and emerging planning policies and market conditions? If no, please explain how and when these may be overcome.	
8. Delivery (please provide details)		
8.1	When do you estimate you will start works on site?	
8.2	If you have already started work on site, at what stage is construction? Please refer to the delivery of dwellings and supporting infrastructure.	
8.3	If you have yet to complete any housing, when do you project the first housing sale will take place (month and year)?	
8.4	Are any alternative methods of construction being used, e.g. modular construction?	
8.5	How many outlets ¹² will there be and who are these / will these be?	
8.6	If any affordable housing requirement is being built by a third party, please provide details and your understanding of the timetable for delivery.	

¹² As referenced on page 7 of the ['Feeding the Pipeline Assessing how many permissions are needed for housebuilders to increase the supply of homes'](#) report, published by Lichfields in November 2021, "Outlets are the sites from which a housebuilder is actively completing homes for sale, either to the market or to other entities (e.g. to registered housing providers for affordable homes). A single site might represent an outlet for housebuilder, although on very large sites (e.g. of several hundred or thousands of homes) there may be two or more outlets with homes being built by different housebuilders or under different brands"

8.7	Are there or do you anticipate there will be trigger points or phasing issues that may affect the build-out rate achievable in different phases?	
8.8	What is the track record of delivery from outlets in delivering comparable sites? Please provide details	
8.9	Do you consider that delivery will be affected by competing sites? Please provide details	
8.10	Are there policy requirements for a specific mix of housing types and are there other forms of housing – such as build to rent? Please provide details	
8.11	When do you estimate you will complete the full development of the site?	
8.12	Please complete the Housing Trajectory Table (see email) with details of projected housing completions by year. Please detail any assumptions (please cross reference to these questions where applicable)	
9. Commercially Sensitive Information (please answer 'yes' or 'no' and provide information where requested)		
9.1	Have you provided any information that you would regard as commercially sensitive? If yes, please specify to which answers this applies.	
9.2	Please explain how disclosure of this information would be detrimental to your organisation.	

Declaration		
I confirm that the information provided is correct to the best of my knowledge:	Name:	Signature:

