

The Black & White site

Comments of the Cheltenham Civic Society

[24/00236/FUL](#)

*Car Park North Place Cheltenham Gloucestershire GL50 4DW
Development of car park for 153 dwelling houses (Class C3)
incorporated into a 4-storey apartment block and 3-storey
townhouses with associated: parking; refuse and recycling storage;
sustainability features; landscaping; tree works; open space;
biodiversity enhancements; drainage; pedestrian links to adjoining
streets; and enhancements to existing vehicle access off North
Place.*

OBJECT

While we strongly support the principle of developing this area of land for residential use, we do not support these proposals. Our comments relate to: i) the strategic context; ii) many aspects of the design itself; and iii) the consultation process.

Strategic context

We appreciate the housing pressures on Cheltenham, but these cannot be used to justify a sub-standard scheme of this kind. Nor should the 40 years or so during which the site has lain undeveloped become an excuse to accept any scheme that comes along.

This site is absolutely critical to the planning of the central area of Cheltenham. Its strategic location and its size demand that it be designed as an outstanding example of urban planning. If we are critical of the proposals before the planning authority, it is in large part because this site deserves the best.

Moreover, this is an important site in the Central Conservation Area and is surrounded by several fine and impressive buildings. It needs something equally impressive to fill the site properly. We think this not only fails to do that, but it does not comply with s72 of the Planning (Listed Building & Conservation Area) Act 1990 in that it does not pay special attention “to the desirability of preserving or enhancing the character or appearance of the conservation area”. It cannot be judged simply as an improvement on a rough-surfaced car park but whether the proposals rise to the challenge of this exceptional site.

It is also regrettable that the council has missed the opportunity to create a master plan to include the adjacent Portland Street Carpark. It will now be difficult to unify the two sites. Missed opportunities include: the possibility of closing North Place to through traffic; providing some limited local retail and community provision (which could be viable with a larger number of residents); better parking provision; more scope to favour walking and cycling; and using Holy Trinity Church as a focal point for the entire scheme.

Comments on the scheme itself

Conservation and heritage

Generally, the proposed architecture is lacklustre, with poor proportions and cheap detailing. The palette of buff bricks is not part of the vernacular in this part of Cheltenham. The plans fail to reference key neighbouring buildings such as the fine St Margaret's Terrace (see below). Instead, they propose an ugly, almost monolithic block of flats facing St Margaret's Road.

This scheme could be anywhere. It makes no reference to the town and its design history. There is no reference to local landmarks or architecture which might have provided focal points for the design - for example the widespread use of stucco and elegant cast iron railings and balconies that are so characteristic of Cheltenham.

Overall design

We are very disappointed that the plans ignore the lessons that could be drawn from nearby Clarence and Wellington Squares. These provide civilised living around open spaces, with buildings at least 5-storeys high. Without resorting to pastiche copies, the plans for North Place could have drawn inspiration from the design principles that were followed there.

The large block proposed alongside St Margaret's Terrace – one of the finest terraces in Cheltenham – will truly be a “monstrous carbuncle” of a neighbour. The grid square supposedly transposed from the St Margaret's Terrace frontage is fabricated by reverse engineering. The proposed new building bears no relation in design terms to its early nineteenth-century neighbour and will sit very uncomfortably alongside it.

Density

The density is far too low at 114dph. Compare this to other developments in and around the town centre. The Haines & Strange site achieved 165dph; Montpellier Spa Road 247dph; both Priors and Grosvenor House achieved 140dph. This site could be developed with buildings at least 5-storeys high,

thereby adding to Cheltenham's housing stock and improving the financial viability of the scheme.

Sustainability

Sustainability should have been at the heart of this proposal. But sadly, that is not the case. We suggest that:

- the entire scheme be designed for EPC level A, in accordance with the council's ambitious net zero plans,
- the properties should be heated through a district heating scheme,
- solar PV should be included on all suitable roofs, and
- the buildings should be planned with an intended lifetime of at least 100 years.

Transport and parking

Sustainability should also be central when it comes to transport planning. Looking ahead, this development should be planned with considerations in mind such as shared car ownership, arrangements for shared car charging and integration with bus routing.

As it is, the whole scheme will inevitably be dominated by moving and parked vehicles. Despite this, there is insufficient parking provision for future residents, which is likely to impact on neighbouring streets. Parking should be provided by underground or undercroft parking: a good, late twentieth-century example of how to do this is to be seen in the award-winning development in Montpelier Gardens and Imperial Square.

Green spaces and trees.

The planned strip between the rows of houses may look attractive in the CGIs but, in reality, it presents a number of problems, for example: the space will need intensive management and upkeep – is there a mechanism planned for this? and the back gardens will likely be full of garden clutter - trampolines, barbeques, washing lines etc. – which do not appear in the visualisations.

The green space within the scheme would be better configured around a public square (see our comments above under Overall Design).

We also have concerns about the boundary treatment with Northfield Passage. This is poorly defined and could end up being a weed-infested edge.

Trees

We would like to see many more trees, including street trees – a characteristic feature of Cheltenham - in the scheme. Indeed, this is now required practice as set out in the NPPF¹. Instead, the one existing street tree in St Margaret's Road is to be removed, and the planned 4-storey block is too close to the road to plant replacement street trees. Likewise, the 3-storey units on North Place. Within the development, most of the proposed trees are small "lollipop" shaped trees which are short-lived and cause access problems because they do not have a 1.8 metre clear stem. Trees need to be tall enough to shade buildings from hot sun and create privacy for upper floor room users. Tree-lined streets are a feature of Regency Cheltenham

Privacy, crime and anti-social behaviour

The layout fails to comply with Secured by Design principles because both the front and back of the two terraces facing the shared green space are publicly accessible. Only front gardens should face onto footpaths and public open space. https://www.securedbydesign.com/images/HOMES_2024.pdf.

The scheme should be reviewed by the Designing Out Crime Officer as there are numerous alleys and cut throughs that could encourage ASB and crime.

Affordable Homes

We welcome the provision of affordable housing, but we are unconvinced by the arguments put forward for why the CBC minimum threshold of 20% cannot be met. At least 20% affordable housings should be provided across the development; and in design terms, market and affordable housing should be indistinguishable.

¹ "Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵⁰, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."

Footnote 50 states, "Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate."

Consultation

The consultation process fell far short of what we would expect for such a key town centre site. By the time the public were invited to comment on the draft scheme earlier this year, there were very few opportunities for suggestions or discussion. When we raised points of principle about the design – for example the value of taking inspiration from Clarence and Wellington Squares – we were told that these had been ruled out in discussions with council officers. The boxes might have been ticked, but the public consultation exercise was of little or no value.

We understand that consultation on the Black & White site was restricted to those living within about 200 metres of the site. Our involvement, and that of the Architects' Panel, seems to have almost an afterthought. In all, only 78 people commented on the scheme: it cannot be the case that this represents the extent of public interests in what happens here. By contrast, the pre-app consultation undertaken for Stakis on its scheme for the Black & White site some 35 years ago included a week-long public exhibition in the Regent Arcade that attracted more than 4,000 people from across the whole town.

Had a master plan for the existing two car parks been drawn up (see comment above), public consultation could have been focused on that and the major principles of the development of the Black & White site could have been established *after* meaningful public debate.

Conclusion

The Black & White site is a strategically important location in the centre of Cheltenham. For the reasons set out above, we feel that the plans before the council fall well short of what is required. We urge the council to reject them and seek a new scheme that would do credit to our town.



Adrian Phillips

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