

Comments on several Consultation Documents from CBC (1 December 2025)

We have reviewed the following consultation documents from Cheltenham Borough:

- City/ Town/ Local Centres Topic Paper
- Residential Above Shops Topic Paper
- Housing Density Topic Paper
- Joint SLP Urban Capacity Study
- Retail & Town Centres Study (Part 1)

Our comments on these are annexed to this paper. Together they raise a number of strategic issues, especially around the future vision for our town centre, which are best handled in this cover document, both because there are some rather glaring contradictions between the different topic papers and studies, and to minimise repetition.

Background

This is a time of uncertainty about the direction of Local Government Reorganisation in Gloucestershire. So, it is right that the ‘outgoing’ council should wish to leave a clear suite of policies to guide the future of Cheltenham under whatever new governance arrangements are adopted. It is also necessary to update the Joint Core Strategy through the strategic and local planning exercise launched last year. Another big factor in shaping plans for the county and our town is the Government’s drive towards reaching its ambitious housebuilding targets and its growth agenda. Inevitably, therefore, Cheltenham faces important changes in how it is run and how the town develops. We assume that these are factors driving this flourish of consultations at this time.

The ‘central issue’

There are many factors that will determine the future development of Cheltenham – notably the success of the major new developments to the west and northwest, the realisation of the ambitious plans for development associated with Cheltenham’s cyber ambitions and the way in which Cheltenham’s economic success relates to Gloucester and the wider subregion. But a key factor addressed in this note is what happens to the town centre.

The consultation papers and studies recognise the relative strength of Cheltenham’s centre, which is clearly better placed in several ways to weather the economic

pressures upon it compared to the other urban centres covered by these reviews. But we do not find in the consultation papers and studies a clear vision for how the centre of Cheltenham should develop.

That is why we have been calling for the preparation of a Master Plan to guide the changes that are already evident and which will grow in future.

A starting point must be an honest recognition of the challenges that the town centre faces, for example:

- There is a big question mark over the future of Cavendish House and uncertainty about the future of the Municipal buildings.
- There are empty shops and underused and empty premises over shops and yet there is a market for living in the centre of town that could also help to meet housing targets.
- Issues around public transport, connections and car parking remain unresolved.
- A major opportunity to create new town centre, riverside greenspace behind Cambray Court was missed (see [CCS OT-23](#)).
- In many places, the public realm suffers from poor quality materials, inadequate maintenance and cheap solutions, such as the resurfacing of the Strand, when a coherent approach to public realm design and maintenance should be implemented.
- The Lower High Street, though vibrant in some ways, is a poor advertisement for the management of a Conservation Area.
- Poor planning decisions, notably 131 Promenade, create a precedent for other schemes that would damage our heritage and the wonderful setting for which Cheltenham is renowned.
- Too many inappropriate or plain ugly buildings blight the town centre, demanding a plan to mend the streetscape as opportunities arise.

Not all of these problems would have been avoided if stronger plans had been in place, but some certainly would have been. That is why we see the preparation of a Town Centre Master Plan as so important.

The scope of the Master Plan

While we address below the policies relating principally to housing density, retail and economic development, as these are the main topics of the consultation documents, the Master Plan should also cover a full range of other issues that affect the success of the town centre. As a basic principle, the plan should build on Cheltenham's strengths

– its heritage, its townscape, its traditions. That means including strong policies for heritage conservation and repair, an active programme to address existing deficiencies in the public realm (where the BID will be a key partner) and an inclusive approach towards public engagement - both in the preparation of the plan and in its implementation, with the early establishment of a town centre forum.

Hopefully other current initiatives, such as the Heritage Action Plan under development and proposed Tree Strategy will help in filling out those aspects of the plan.

What policies should a Master Plan contain?

In the fields of planning covered by the consultation documents, we believe that the Master Plan should adopt the following policies:

- **Build to higher densities.** The most valued parts of inner Cheltenham are built to relatively high residential densities, but when a unique opportunity came up to replicate this, by building up to 5 or even 6-stories in North Place (24/00236/FUL), this chance was lost. The density in that scheme is expected to be 106 dwellings per hectare (dph), whereas the new minimum target set by the Government for sites like this is at least 120 dph. ([National Model Design Code: Part 1 - The Coding Process](#)). By contrast, the nearby Grosvenor House, in Evesham Road, is built at 150 dph, and St James Walk Honeybourne Way at 450 dph. The Cheltenham Capacity Study (Annex 2) gives other examples where higher or much higher densities have been achieved. Replicating the traditional squares and terraces of Cheltenham in a 21st century manner, as these developments have done, could have provided more homes for people to live in or near the town centre, with consequential benefits in environmental considerations, town centre vitality and so on.
- **Build higher.** The buildings in North Place area are a 4-storey apartment block and terraces of 3-storey townhouses. We think that appropriately sited, new town centre buildings could be higher, maybe even 7-storeys in the right site. For example, Grosvenor House and St James Walk are 5- and 6-storeys high respectively. The use of top floor setbacks and mansard roofs already permitted in NPPF allow buildings to be higher without overwhelming the neighbours or dominating the townscape.
- **Put parking underground.** New build in the town centre should provide minimal space for parking on the surface. Instead, much more use should be made of undercroft parking, as has been done successfully on the south side of Imperial Square and the north side of Montpellier Gardens as well as in St James Walk and on Bayshill. This too could have been done in the North Place development, but was not. Not only would streets then be less congested and vehicles largely

removed from the street scene, but it would be easier to build at higher densities and with safer EV charging provision.

- **Create more living space over retail in the town centre**, e.g., over shops. We were surprised that the Capacity Study for Cheltenham, when discussing repurposing of town centre properties in commercial use concludes: “Though CBC are aware of the Borough’s need for one-bedroom dwellings in sustainable locations such as the town centre, there are often difficulties in addressing amenity / environmental issues to bring these forward in practice. Therefore, CBC are taking a conservative approach regarding this opportunity at this present time.” Though the report goes on to say that CBC is reviewing the scope for provision of residential above shops, we think this is a timid response. There should be strong presumption that vacant properties above retail should be re-purposed as residential, though of course with the usual safeguards to ensure acceptable living standards.
- **Shrink the town centre.** Like high streets everywhere, Cheltenham town centre faces stiff competition from out of centre stores and on-line shopping. While the evidence suggests that it is able to better withstand this aspect of competition than most towns in the county, it is handicapped by a very extended town centre, with the High Street nearly a mile long. This makes it difficult both to maintain a successful retail offer when the individual units are so widely dispersed and to implement successful design approaches. There should be a plan to help concentrate the retail and related town centre offers nearer the geographical centre of the town. It might also help to divide the centre into smaller, more distinctive areas, perhaps drawing on the different paving, shapes and orientation of buildings and micro-identities.
- **Keep a watch on Airbnb etc.** This trend was brought up in the consultations but not reflected in the studies. We are concerned that residential space is being lost to this kind of use. At very least the council should monitor the situation and act if necessary. Though the planning situation is not very clear, full use should be made of such powers as are available to ensure that this trend does not get out of hand, for example by only using units for this purpose when they that would fall below minimum space requirements for permanent habitation.
- **Make for a better living environment in the town centre.** Several of the above measures would encourage more people to live in the middle of our town but then we need to offer a better living environment for them. For example, extend the traffic-free areas (which at present cover only the Strand and a short length of the Prom); discourage through traffic; take action to reduce anti-social behaviour; ensure the public realm provides reassurance (e.g. minimum shuttered shops, litter, graffiti); plant more trees in the ground, raised beds and planters in all public

spaces ; better connect the Minster and grounds to the streets around; use the impending changes at Cavendish House to create a new civic focus (as the Civic Society have suggested - see [CCS-OT34](#) and [CCS-OT-27-v2](#)); and repurpose the back of the Municipal buildings and relocate the bus station to improve the setting of Royal Crescent.

- **Take care not to imbalance the town centre.** CBC's acquisition of properties opposite the Brewery with a view to redevelopment could draw traffic away from John Lewis and Marks & Spencer, which could cause those precarious businesses to leave our High Street and leave the upper High Street struggling. Broad, imaginative strategies and policies will be required to address this risk.
- **Control demolition and promote reuse.** Release of embedded carbon from demolition needs to be minimised. Existing structures, such as Cavendish House, should be reused and refaced where possible. The case made by the Don't Waste Buildings group, which was presented to a number of Cheltenham stakeholders on 21 November 2025, made a compelling argument for rethinking how we should use vacant buildings. While not in the town centre, of course, it is regrettable that the council seems ready to ignore this message in respect of the redevelopment of the Lansdown Industrial Estate, where again the Civic Society has proposed an alternative approach ([CCS OT-23](#)).

Adopting policies of this kind should make it easier for Cheltenham to achieve its housing targets, reduce the need to build on the fringes of the town, create the conditions that favour public transport, walking and cycling, contribute to achieving Cheltenham's environmental aims and help to bring more people and life back into the town centre.

Out of town and box retail

As well as our comments on the town centre, we recommend that the SLP strengthens approaches to out-of-town and big box retail, recognising it as one of the principal ongoing threats to town centre vitality, sustainability and modal shift. While the sector is adapting - introducing smaller units/cafés/food offers and exploring residential integration - it remains largely unplanned, with supply and demand inconsistently balanced. The churn at Homebase, M&S and The Range illustrates this unmanaged evolution. Policy should explicitly address the environmental impacts of big box retail, particularly vehicle-dependency, and ensure that future schemes are assessed in the same strategic way as town-centre proposals.

Given the likely intensification of out-of-town retail and warehousing along Tewkesbury Road and west of the town arising from J10 reconfiguration, we would like to see policies that actively guide form, scale and mix rather than allowing organic expansion.

This growth must be coordinated with town centre redevelopment ambitions, supported by more robust horizon scanning and scenario planning. Instead of projecting forward from the present, policies should consider conditions post-J10 and the development of Regent Village (Elms Park), planning proactively for the transition area between Gallagher Retail Park and the M5 to avoid unmanaged sprawl and to reinforce the role and offer of the town centre as the primary hub.

Attached annexes

1. City/ Town/ Local Centres Topic Paper (pages 7-8)
2. Residential Above Shops Topic Paper (pages 9-11)
3. Housing Density Topic Paper (pages 12-13)
4. Joint SLP Urban Capacity Study (page 14)
5. Retail & Town Centres Study (Part 1) (page 15)

Annex 1 - our comments on City/ Town/ Local Centres Topic Paper

The Topic Paper provides a forward-looking analysis that demonstrates the councils' commitment to understanding the evolving role of centres and responding proactively to national policy changes. It offers an impressive synthesis of evidence, consultation feedback, and emerging trends, forming a strong foundation for a strategic, future-ready approach to supporting vibrant and resilient town and city centres.

However, while the paper identifies issues, it does not clearly articulate what the SLP intends to prioritise for centres over the next 15–20 years. In particular, it lacks a clear vision for how the centre hierarchy is intended to function in practice, especially between Cheltenham and Gloucester.

There is also insufficient linkage to the Gloucestershire Economic Strategy. The Strategy stresses the need for a coordinated growth corridor, yet the paper does not explain how town centres—especially Cheltenham, with its emerging cyber-innovation hub—will support this.

The discussion of out-of-centre retail is underdeveloped: although the paper acknowledges an oversupply, it stops short of setting out a clear policy direction on future restrictions, rationalisation, or repurposing of retail parks. A key question remains how Cheltenham can best leverage its relative strengths to drive regional vitality and anchor a coherent centres hierarchy.

Further clarification would be helpful on how the SLP plans to address:

- affordability issues for both housing and commercial rents
- constraints on retrofitting heritage buildings to meet climate-adaptation goals
- feasibility challenges in bringing more residential use into Cheltenham's historic building stock, and
- balancing the demand for family-sized homes with the prevalence of studio/1-bed conversions.

The Golden Valley Cyber Campus is likely to reshape regional patterns of employment, footfall, and demand for food, drink, and retail within the town centre, and future policies should proactively anticipate this shift.

In terms of policy direction, it would be valuable for the SLP to:

- introduce clear criteria to resist further out-of-centre retail expansion and support the gradual repurposing of retail parks (for employment, community, or logistics functions)

- address transportation challenges and the need for sustainable mobility solutions, including improved walking and cycling networks, better public transport integration and reduced reliance on private cars within town centres, and
- emphasise the importance of high-quality public realm, safety and overall orderliness as fundamental components of successful town and city centres. While Section 8 touches on these issues, the Topic Paper could place greater weight on their role in driving footfall, improving perceptions of safety and supporting economic confidence. Out-of-town retail parks often succeed precisely because they offer predictable advantages—cleanliness, clarity of layout and a sense of security—and it is vital that urban centres match or exceed these qualities if they are to remain competitive and welcoming for all users.

The Paper represents a strong and thoughtful foundation for shaping the future of centres across the SLP area. With its comprehensive evidence base, recognition of emerging trends, and commitment to proactive policy development, it provides a good platform on which to build a bold, ambitious and resilient strategy. Strengthening the areas highlighted, the SLP has the opportunity to deliver genuinely vibrant, sustainable and forward-looking centres that serve residents, businesses and visitors for decades to come.

Annex 2: our comments on the Residential Above Shops Topic Paper

Current Policy

The present JCS Policy SD2 is unhelpful as it focuses on retail functions rather than the habitability of upper storeys.

8.4 The concept of living above shops is not specifically referred to in the policy but there is general support for the encouragement of more town centre living.

This is not evident in CBC. CCS has had to push CBC to consider schemes and CBC has been generally slow to acknowledge the potential of uppers for residential use. In the case of an application over ASK Pizza in Montpellier, environmental health such as noise pollution, was used as a reason to turn down consent. This is inconsistent with the supposed drive for conversion and fails to acknowledge that town centre living is, by definition, more noisy and subject to other environmental compromises, such as late night noise. This is a part of town centre living rather than a policy hurdle to be overcome.

Consultation

The SLP autumn/winter 2023 consultation showed:

- Many respondents considered that there should be more emphasis on urban renewal, together with more residential and less shopping in town centres and more employment uses.
- The densification of town centres was often suggested, increasing densities and allowing change of use of upper floors to residential. It was suggested to increase density for residential within both centres and within walking distances of centres. Suggestions included mixed development based around 'Urban Concentration' so that all services are central and within a safe environment.
- Incentivising modifications to existing buildings to make them more accessible and energy efficient was suggested along with the repurposing of existing structures and sites for new businesses and accommodation. A further suggestion was for under used offices in town centres to create multi occupancy rentals for people / companies involved in hybrid working. It was recognised that in transitioning the centres there will need to be a high level of flexibility in the use and reuse of existing properties particularly being more open minded in the use of brown field sites and existing buildings / uses.
- There was concern for existing empty retail sites as these can make centres unwelcoming, discouraging people to visit. A suggestion was to reduce the total

number of retail outlets and concentrate them together, repurposing dispensable units to provide housing.

- Heritage and quality of the centres was a prominent theme in the respondents' comments. They emphasised the importance of consideration of the character and heritage value of such important properties, suggesting that well-preserved heritage can be the key to economic success. Respondents considered that attractive environments, clean streets and an effort to create a special quality of place would entice visitors to the centres. 12 SLP Centres Topic Paper Suggestions for improvement include benches and seating areas with planting for shade and carbon capture, consideration of safety and security and more public green spaces and town squares to provide a focus for social gatherings, such as festivals and markets.
- There was concern that if shops are being replaced by housing those areas no longer feel like part of the centre or the high street.

These points must be considered and translated into effective policies, with clear read across to ensure policies are pragmatic, practical and sufficiently broad to enable free-thinking and application.

Draft Policy

Welcome proposals:

- Planning guidance for owners to understand what they can do under PD and, importantly, what they cannot do, such as with listed buildings.
- Listed buildings should be covered by additional guidance, framed to support conversions in principle and supported by pragmatic considerations that should be addressed.
- This should be extended with guidance for what is acceptable in conservation areas.
- While signposting to grants and funding sources might be useful, it probably doesn't belong in a strategic document as the information will go out of date. It is also worth stressing that grants are very limited nowadays so the onus must rest with building owners.
- Some barriers to conversion were identified but others not, e.g., mortgages for dwellings over shops. This should also be addressed so that it can be managed.
- The prevalence of absentee landlords, for whom properties are just a line in their spreadsheet, is a critical obstacle to conversions and needs to be addressed by the new policies.
- The positive policy approach (10.8) to enable increased housing delivery is important due to the limited availability of other development land.

Options need to be more imaginative and broad-minded. These should include:

- Development of uppers must be part of the town centre master plan (see our comments in the cover paper).
- Approaches to construction of additional storeys where appropriate and feasible, particularly creation of mansard storeys. In 2023, the National Planning Policy Framework (NPPF) was updated explicitly to support mansard roof extensions, encouraging them on suitable properties where the design harmonises with the original building.
- Some leeway for national space standards in heritage buildings, including listed buildings. If not, the spaces could remain unused and undeveloped so there will be no net gain. Similarly, LPA should consider smaller units for B&B type properties, which are especially important to our tourist economy, but which might equally be useful for temporary accommodation, e.g., homeless people.
- More emphasis should be placed on making the spaces work than worrying about physical space standards, e.g., covering refuse and recycling provisions and accommodating the trend for open plan living.
- Potential to create shared living spaces/HMOs rather than just self-contained flats but design guidance is needed.
- Consideration of local conditions that could facilitate conversions of uppers, e.g., access to underground recycling/waste bins to obviate need for storage on premises.
- Caution over conversion of shop premises themselves and loss of shopfronts, especially historic features, and the effect on the street and setting of their removal. Particular features that deserve protection include ghost signs and old signwriting; glazing units, mirrors and windows; corbels, fasciae, blinds and stallrisers; decorative thresholds.
- Potential incentivisation of building owners to convert uppers. There may be reluctance if new access removes a significant portion of the high rent shopfront if access is via the front. Front vs. rear access must be properly assessed to maintain high quality dwellings and attractive frontages.
- Linking policy to and aligning with shopfront design guides.
- The role of enabling development for listed buildings.
- Clearer guidance on creating independent access to uppers, from front or rear.
- Treatment of rear accesses and deconfliction with service areas, eg delivery bays, fire escapes.
- Test: why wasn't resi mandated for uppers of the Cotswold Retail outlet?

Useful References:

[Residential above Shops Topic Paper 2025.pdf](#)

[Homes on our high streets | FMB, Federation of Master Builders](#)

[Vacant-Units-Action-Plan.pdf](#)

[Future High Streets Fund - GOV.UK](#)

[City, Town and Local Centres Topic Paper \(2025\).pdf](#)

Annex 3: our comments on the Housing Density Topic Paper

Summary

The paper “sets out the importance of securing optimum residential densities across the SLP area [Cheltenham, Gloucester and Tewksbury] to deliver good quality placemaking in line with national government policies, guidance, and housing targets” (1.3). This note focuses on Cheltenham.

The paper notes that central government housing targets were increased in December 2024. They now require 821 new dwellings pa in Cheltenham. Estimates of capacity for new build derive from site availability and density assumptions in the Housing and Economic Land Availability Assessment (HELAA) 2024. The paper points out that they are below those set out in the National Model Design Code (NMDC)- and so were increased in 2025. The new minimum target are:

City /Town 120+ dwellings per hectare - dph; Urban Neighbourhoods 60-120 dph, (e.g. Pittville, Lansdowne); Suburbs 40-60 dph, (e.g. Hatherley, Leckhampton); Outer Suburbs 20-40 dph; (none in Cheltenham). Higher densities are “actively encouraged where appropriate” (3.1.3,4).

There are useful reminders of what can be achieved, for example:

- Ebenezer Howard’s (very green) Garden City had 30,000 people on 1,000 acres; achieving that concentration of people with current household sizes requires 80 dph (Fig. 11. CABE)
- Georgian Squares achieve similar densities
- 60 dph is the minimum for tram service to be viable.

Some examples from elsewhere are provided and existing high density developments in Cheltenham are noted (3.3) – e.g. Royal Crescent (125 dph); Victoria Place (74 dph); Albert Street (99 dph).

Discussion

The paper makes an effective argument that increased density can provide more housing capacity, less reliance on cars, and, in the case of Cheltenham, an appropriate urban form.

However, the paper does not explore the implications of the argument:

- There is no calculation of how many dwellings / how many more dwellings can be accommodated under the revised HELAA standards, and whether that is enough to meet housing targets

- There is no systematic review of recent planning permissions for housing, their achieved density, how that fits the standards – and crucially, if not, why not. The major developments along Shurdington Road / Kidnappers Lane are not mentioned, for example. Yet 21/00847 Pear Tree Close yielded 16 dph, the adjacent site (25/01073) 12dph, substantially below previous density requirements (30 dph outside built up area) and new requirements (suburbs 40-60dph). Such a review is required to show how density targets can be met.
- Three examples of comparatively high density development are given, yet in at least one – North Place – CCS argued that density should have been higher than consented
- There is little explicit detail on the need to maintain space standards within dwellings in higher density developments (see Nationally Described Space Standards 2015), or on the need for ready access to public transport and facilities
- There is no discussion of the obstacles to achieving higher densities, including but not limited to the apparent developer view that purchasers' revealed preferences are for detached two storey houses with off street parking; the limited effective demand for dwellings at current market prices.

Conclusion

The policy case is made. The means and difficulties of implementation are not discussed. A framework for implementation is required, including but not limited to, arrangements for overcoming past obstacles to higher densities; an estimate of how many additional dwellings higher densities might yield; arrangements for monitoring how far higher densities are achieved; ensuring that high standards are maintained for dwelling design, including space standards, and for access to transport and other facilities.

Annex 4: Our comments on the Joint SLP Urban Capacity Study

We would support giving local authorities greater powers to bring unused buildings back into residential use – including upper floors of commercial buildings in the town centre.

We have three main comments:

1. There is no mention of the loss of housing stock to AirBnB type accommodation, or any plans to regulate this activity. This is becoming an increasingly serious factor in reducing the size of the town's available residential stock.
2. We are really surprised by the comment in para 2.59: "... it is considered that there is no urban capacity potential from town centre retail units at this time." In fact, there is considerable potential to provide additional residential accommodation in the town centre in vacant or underused space above retail premises. Indeed, there has been a string of recent planning consents designed to achieve precisely that: repurposing former storage etc. areas above shops so as to create new town centre flats (for example, 24/00387/FUL, 25/00014/LBC and 00/00250/COU).
3. A recent development since this report was drafted is the ongoing movement of university operations from Cheltenham to Gloucester, which is likely to reduce demand for student accommodation in Cheltenham (both purpose-built student accommodation and house shares in the private rental sector). This also presents the opportunity for repurposing campus sites. The Folley sports site has already had planning consent for social housing. Hardwick campus has been sold to developers. The University is at the early stages of consulting on the future of Francis Close Hall campus, and parts of Park campus are already being sold off piecemeal for residential development. Campus sites provide valuable green spaces which are open to and well-used by the neighbouring communities. This should be a consideration when/if these sites are developed for other purposes, and the green spaces should have protection from development.

Annex 5: Our comments on the Retail & Town Centres Study (Part 1)

General comment

Retail trends, usage, location and composition should be considered as essential parts of policies and plans for a thriving Cheltenham, and be fully integrated with transport, housing (including density) and urban planning. We hope the forthcoming part 2 analysis will provide enough nuance to allow better, and better integrated strategic planning. Composition and location are especially important in underpinning a thriving town centre economy which can reverse the current trend that is pulling retail out of it.

Detailed comments

- The Part 1 report identifies some high level (national) trends but does not provide the understanding of the local implication of this for retail location and composition which are needed to formulate effective policy. For example, retail policy for Cheltenham needs to be based on an understanding of the current weakening of brick-and-mortar retail occupancy generally, and the shifting composition of retail in towns and between neighbourhoods, as these appear to be creating competition rather than complementarity between town centre and out-of-town developments.
- Although Cheltenham's town centre decline is in line with national trends, it is somewhat protected by being (still) a destination location, supported by the festivals and the general attractiveness of the historic centre and its Regency reputation. Surprisingly, though, the latter is not specifically identified as a factor in the report. This important element in the competitiveness of Cheltenham's centre should not be taken for granted: it depends on the effective protection and conservation of the heritage environment, the care and maintenance of green areas and integrated sustainable transport. All this requires strong planning policies which are consistently enforced.
- Not surprisingly leisure (including hospitality and hotel rooms) is the largest sector: in principle, planning policy should support its continued growth. However, this should be done in a way that takes into account other interests: for example, there is a potential conflict between encouraging a vibrant night-time economy and encouraging more people to live in the town centre and supporting a strong heritage visitor economy. The Part 2 study will need to be clear what a 'thriving' town centre economy should mean in the Cheltenham context.

- There is need for integrated retail planning across Cheltenham – and indeed more widely. We understand the need for retail space outside the town centre, but the current apparently. ‘hands-off’ approach risks weakening town centre retail.