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Tracey Crews,  
Head of Planning,  
Cheltenham Borough Council,  
Municipal Offices,  
Cheltenham.

10<sup>th</sup> December 2013

Dear Tracey,

**Re: OBJECTION TO THE PROPOSAL TO REMOVE THE GREEN BELT STATUS  
FROM LAND AT THE CHELTENHAM RACECOURSE**

The proposal to remove the Green Belt status from the land on the south side of Cheltenham Racecourse was an after-thought. It was never mentioned during any of the three years of discussion at the Joint Core Strategy/Member Steering Group meetings, which means it never formed part of the core strategy for Cheltenham, Gloucester and Tewkesbury.

Why should it? The land has always played a prominent part in securing the openness of the Racecourse, a point recognised by the consultants AERC and AMEC, who were engaged to study the significance of the Green Belt around Cheltenham in March 2007 and again in September 2011.

The Leader of Cheltenham Borough Council claimed at the 5<sup>th</sup> September 2013 council meeting that the proposal was "only a tidying-up exercise" of the Green Belt, and the Chief Executive claimed at a subsequent meeting with the PAB group councillors, that "he didn't even know it was being proposed".

The Leader of the Council went further, and added to his earlier comment: "By putting the JCS out to public consultation, it would be possible to take out that area depending on the feedback."

On that advice, I strongly object to the proposal to remove the Green Belt status from the land on the south side of the Racecourse and the north side of New Barn Lane for the following reasons.

In June 1984, an appeal to develop the land was dismissed by the Planning Inspector. This is what he said: ***"In my opinion, the possible impact of the proposed development on the character and environmental setting of the Racecourse is a prime consideration, irrespective of any arguments regarding the Green Belt boundary. It is distinguishable from the adjoining Pye site, largely on account of its contours and its visual domination of the Racecourse. The site in conjunction with the other open land to the west, provide an attractive, grassland buffer between the New Barn Lane housing and the Racecourse. From the southern part of the appeal site, fine views are obtained across the Racecourse to Bishop's Cleeve and Southam. In my opinion, the existing natural grassland setting of some 150 to 200 metres in depth would not be adequately replaced by a landscaped strip of some 35 metres. Not only would the visual character of the area be entirely altered, but the location of residential uses and their associated activities in***

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**Leader of the Independent Group (PAB) Cheltenham Borough Council  
Mayor of Cheltenham 1997/98  
Web site: [www.pab.org.uk](http://www.pab.org.uk)**

***such close proximity to the Racecourse, would contribute to the urbanisation of the surroundings."***

In March 2007, Cheltenham Borough Council commissioned Applied Environmental Research Centre Limited (AERC) to provide independent advice on the Green Belt for input into the Core Strategy.

The AERC Green Belt Review included "Extensive consultation with Tewkesbury Borough Council, Gloucester City Council, Gloucestershire County Council, and officers of the South West Regional Assembly."

AERC found that three of the four Cheltenham Borough Council Green Belt policies contributed positively to the purposes of the Green Belt, and should be included in a future Local Development Framework without change.

The fourth Green Belt policy allowing "limited infilling at Bowbridge Lane and Shaw Green Lane", would not, in the opinion of AERC, "contribute positively, and would conflict with Green Belt purposes and could be considered unsound."

It did not suggest that the Green Belt status of land at Bowbridge Lane and Shaw Green Lane should be removed, it recommended that "infilling should not be included in a Green Belt policy".

On 5<sup>th</sup> March 2007, AERC held a seminar at the Municipal Offices for councillors from Cheltenham and Bishop's Cleeve. Officers were also in attendance.

Seminar attendees were given maps of Cheltenham and surrounding district, and they were asked to score against those areas of Green Belt that they considered made significant contributions to the purposes of the Green Belt (prevent merging of settlements). The area that received the highest score was the land between Prestbury and Bishop's Cleeve, including the Racecourse.

The AERC Review when commenting on the 'ranking exercise' said: "***The assessment reflects the view (shared by the stakeholders) that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham with Bishop's Cleeve, and checking urban sprawl.***"

Figure F (Map of Cheltenham and surrounding area) of the AERC Review, confirmed the strong, I repeat strong Green Belt boundary that existed along New Barn Lane.

Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council commissioned AMEC Environment and Infrastructure UK Limited to carry out an assessment of the Green Belt in readiness for the Joint Core Strategy.

AMEC published their final report in September 2011.

Their findings on the Green Belt in the Cheltenham and Bishop's Cleeve segment, was similar to the findings of AERC.

AMEC reported: "***The separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981).***"

Segments NE18 and NE 22, which abuts Prestbury, is included in the total segments that make up the land between Cheltenham and Bishops Cleeve. The Green Belt area also abuts New Barn Lane, similar to that shown in the 2006 Cheltenham Borough Council Proposals Map.

AMEC, in its evaluation and recommendations concerning the land between Cheltenham and Bishop's Cleeve, made the following observations. 1. The segments NE 18 and NE22, along with others, make a significant contribution towards preventing sprawl in various locations where there is already some evidence of ribbon development.

2. The segments make a significant contribution towards the separation of Cheltenham and Bishop's Cleeve.

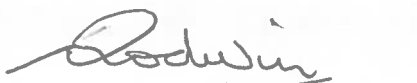
3. Safeguards the countryside from encroachment: although there are significant urbanised areas associated with Cheltenham Racecourse and associated development, much of the land is open. There are no strong boundaries to contain development. In its recommendation, AMEC reported: "**Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of the Green Belt designation. These segments play an important role in this.**

***Therefore, this area does not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise."***

Your comment at our one-to-one meeting in your office on Wednesday, 6<sup>th</sup> November 2013, that the reason for the 'tidying up' exercise is due to the recent problem of a planning application in the area, and the Local Government Ombudsman (LGO) case that followed. I suggest is not consistent with the AMEC recommendation above. The fact that a resident objected to a planning permission given for a development in the Green Belt and was successful with his application to the LGO, should not be condemned, or used as an excuse, but hailed as a success in the defence of the Green Belt around the Racecourse.

For the reasons I have set out above, the proposal to remove the Green Belt status from the land on the south side of the Racecourse, would be a retrograde step, and contrary to the purpose of the Green Belt.

**I strongly object to the removal of the Green Belt status of the land on the south side of the Racecourse.**



Councillor Les Godwin.

Member of the JCS Member Steering Group.