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Strategic and Local Plan  
C/O Tewkesbury Borough Council  
Public Services Centre  
Gloucester Road  
Tewkesbury  
GL20 5TT

Date: 24 September 2024

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Dear Sir / Madam

**Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan – Response to proposed reforms to the National Planning Policy Framework and other changes to the planning system.**

This letter sets out the response of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council ('the councils') to the above public consultation. The three councils (and Gloucestershire County Council) are jointly preparing a Development Plan as set out below.

**Preliminary comments on Strategic Planning**

The three Councils have a track record of working together jointly (along with Gloucestershire County Council) on strategic planning. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) was adopted in 2017 and work is currently progressing on the preparation of a successor Strategic and Local Plan (SLP).

Our joint work is made possible because each of the local planning authorities already recognise the need to plan for growth and sustainable development at a 'larger than local' scale. Our housing and economic markets function in ways which do not align with the administrative boundaries and for that reason we took the decision in 2008 (and have since reaffirmed our commitment) to crystallise the Duty to Co-operate through our formal joint plan-making.

We note and welcome the fact that the current consultation promises to establish formal mechanisms for universal strategic planning coverage in England, albeit details are reserved for a later date. Our view is that certainty in this regard will be essential in enabling councils to prepare timely and effective development plan documents. The proposal for settled cross-boundary strategic planning arrangements are therefore to be very warmly welcomed and we look forward to engaging in that discussion at the appropriate time.

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Date: 24/09/2024  
Officer: Adam Gooch  
Reference: NPPF Response

In the meantime, as a preliminary comment, we would urge Government to introduce these reforms in a measured and proportionate way. We are aware that the stated intention is to introduce strategic planning arrangements across functional economic areas. The SLP area encompasses the County's principal settlement of Gloucester; and Cheltenham and Tewkesbury and surrounding rural areas straddling the key motorway (M5) and mainline railway networks. Our area is an economic powerhouse with a number of growing modern employment sectors including cyber, high tech and aero engineering.

To the east is Cotswold District and to the west the Forest of Dean which are much more self-contained rural districts. Equally South Worcestershire to the north has strong affiliations with the Birmingham and West Midlands conurbations. Stroud district is to an extent aligned with South Gloucestershire and Bristol to the south, although it is also undoubtedly connected to the SLP area in forming part of the M5 corridor.

The SLP area therefore operates as a functional economic area and one which in our view would naturally form an appropriate strategic planning geography. We would ask Government to bear this in mind as the reforms emerge and are refined.

### **Proposed reforms to the National Planning Policy Framework and other changes to the planning system**

We have chosen to highlight the key issues of relevance to our authorities rather than respond to each of the 106 questions. These are set out below under relevant headings which align with the structure of the Government's consultation document.

#### ***Planning for the homes we need***

The councils recognise the pressing need to plan, as a nation, for more housing and we support the Government's ambition to deliver the 1.5 million homes during the course of the Parliament. We are ambitious in our economic growth aspirations and recognise the need to deliver good quality sustainable new housing at a price that people can afford in well-designed and connected places.

We strongly support the retention of a plan-led system in planning for growth. The renewed focus on well-designed places and preparation of local design codes is also to be welcomed.

We do not oppose to the principle that the standard method should no longer be considered as merely an advisory starting point in calculating the housing needs of an area. However, contrary to some inferences in the consultation narrative, the standard method figures are not the same thing as mandatory housing targets. It should be made clear that housing requirements to be set out in local plan policies will still need to be established through assessing constraints and opportunities and the duty to cooperate as set out in Paragraph 11 of the National Planning Policy Framework (NPPF).

The fundamental point however is that the increased housing figures would undoubtedly be very difficult to deliver in the short to medium term. Collectively, the figure for the SLP area would increase by 25%; and for Cheltenham this would be an increase of 53%.

Targets in themselves do not deliver homes. Plans will need to be realistic about development viability and the ability, willingness and capacity of the development industry to deliver homes at the rate necessary to meet identified requirements. It should be recognised that planning for housing is not just about numbers but about the creation of places for people. It is likely that the councils will wish to frame the SLP around a vision which will include strategic scale sustainable urban extensions and/or new settlements. Inevitably, such a pattern of development requires significant lead-in times and provision of substantial infrastructure. The Government's reforms could therefore helpfully focus on assisting such patterns of development, for example

though interventions around assisting land assembly, boosting affordable housing grants, and funding/providing strategic infrastructure (including on the strategic road and rail networks).

Other factors frustrating delivery of increased housing include the lack of genuinely available and suitable sites, and abnormal costs of development particularly on brownfield sites in urban areas such as Gloucester.

These issues are compounded by the proposed changes to the method for calculating five-year housing land supply. In particular we oppose the reintroduction of the buffer, and the proposed exclusion of past over-supply from the figures.

The principal reason for this is that, as things stand, it is highly likely that the three SLP local planning authorities would be unable to demonstrate a five-year housing land supply in the foreseeable future. This will result in ever more planning permissions being granted in locations which are not compliant with existing local plans, and which are deeply unpopular. We would strongly argue that this would be counter-productive in seeking to implement national planning policy reforms.

Any form of planning system needs to be founded on public participation and engagement and any protracted period of the operation of the 'presumption' will likely erode public confidence in a system which is described as plan-led. This also risks slowing the system down, burdening the Planning Inspectorate and loading costs onto councils in contesting appeals.

In this regard, it is unhelpful that proposals for universal strategic planning mechanisms to replace the Duty to Co-operate, and local plan making reforms are to be considered separately to the current proposals. The ability to prepare local plans with settled arrangements for 'larger than local' areas will be essential in delivering the ambitious scale of growth needed in the SLP area.

For this reason, we would strongly recommend that the application of the revised Standard Method figures, and changes to the five-year housing land supply calculation should only be introduced when sufficient time has been allowed to prepare a new generation of plans in line with wider reforms.

In terms of the standard methodology itself, owing to the role of local authorities in meeting local housing need, it may be of greater benefit to use the residence-based median house price and earnings ratios respectively, to truly reflect housing costs at a local (i.e., district) level. Using an average over a three-year period is also sensible, as this will help to smooth out significant house price variations.

We would also support rental affordability forming part of the standard method model. Rental affordability is a key part of the national and local housing markets and is increasingly relied upon by local authorities and national government to accommodate a range of housing needs. In terms of incorporating this into the Standard Method, an affordability calculation using the same methodology as described above, but drawing upon statistics collated within the [Office for National Statistics private rental market summary statistics in England](#) would seem appropriate.

### *Affordable Housing*

The proposal for the provision of a greater proportion of Social Rent provision is welcomed, together with the recognition that the precise split of tenures should remain a matter for local determination.

We also welcome the proposed removal of the requirement for 10% affordable home ownership on major sites, together with the 25% First Homes requirement as these are currently an arbitrary measure.

We would support retaining the option of delivering First Homes, including on First Homes exception sites. Whilst our preference is delivering Shared Ownership homes as our preferred affordable home ownership tenure, First Homes should be provided to support households from a range of income brackets with multiple

avenues into obtaining affordable home ownership. This is especially relevant on sites where the appetite for Shared Ownership is likely to be muted, such as all flatted developments which lend themselves to the delivery of First Homes. Providing a range of options for households in affordable home ownership need will help to create a healthy housing market and offer several different avenues for residents to get onto the housing ladder.

### ***Brownfield, Grey Belt and the Green Belt***

We strongly support the 'brownfield first' principle and the preparation of technical work to inform our understanding of urban capacity in Gloucester and Cheltenham is an important part of our evidence base work. However, it should also be recognised that brownfield land often has intrinsic value for heritage or ecological reasons. Equally some brownfield sites are an essential part of the mix in meeting a range of employment land needs in suitable locations and this ought to be recognised in the NPPF.

The councils support the need for local plans to be informed by up-to-date reviews as to the extent to which land contributes to the Green Belt purposes. However, we are concerned over the proposed definition and implementation of the concept of Grey Belt land. Firstly, whilst some guidance is proposed, it is highly subjective as to whether any particular parcel of land would represent Grey Belt land. We are concerned that, as drafted, the revised NPPF would result in endless argument with site promoters over the status of individual sites. If the concept of Grey Belt is to be introduced, it should be made clear that its status can only be confirmed, through an evidenced and independently examined process as part of preparing the local plan. This would also ensure appropriate public involvement in identifying Grey Belt areas.

We are further concerned over the proposal that development proposed on Green Belt land where there is a housing land supply shortfall should no longer be considered 'inappropriate'. To do so would undermine a fundamental principle of Green Belt policy and lead to sensitive designated land being too easily released. Furthermore, there is insufficient clarity as to what would amount to 'unmet commercial or other need' and this would introduce considerable ambiguity into decision-making on planning applications.

As regards the proposed 'golden rules', we would support the requirements to achieve 50% affordable housing on sites which are released within the Green Belt as, broadly speaking, these sites generally possess greater capability to deliver higher levels of affordable housing delivery due to the lack of constraints upon development and associated higher land values.

We also support the requirement for national and local infrastructure and provision of green infrastructure associated with Green Belt development, although these should also be a feature of good planning across the piece including in non-Green Belt areas.

On a more general point, perhaps too much emphasis is being placed on Green Belt reforms in the current proposals which fails to recognise that solutions to unlocking long-term growth will require reforms to a much wider range of planning considerations. This includes assessment across all land designations, including for example National Landscape (also known as Areas of Outstanding Natural Beauty).

### ***Building infrastructure to grow the economy***

Broadly, the proposals to support modern forms of employment are welcomed. In this respect the SLP area is well placed to continue to provide a location for economic growth and support UK plc given its strong intra-regional links with wider Gloucestershire, the Central Severn Vale and the Western Gateway. However, a fundamental constraint is the finite capacity of motorway junctions on the M5 in particular. The Government should prioritise taking a co-ordinated national approach, in collaboration with National Highways, in finding solutions to growth along the M5 corridor. This could work within the principles set out for a vision-led

approach to transport planning, including ensuring national funding is facilitated to manage what is national infrastructure.

### ***Green energy and the environment***

The councils warmly welcome proposals to unlock green energy including wind and solar, subject to other planning considerations and local evidence on capacity. However, the policy revisions should take the opportunity to encourage local planning authorities to develop policies requiring improved energy performance in new buildings. A much firmer basis is required in order to facilitate the preparation of robust local policies to address the causes and effects of climate change.

### **Development Management – Changes to planning application fees and cost recovery**

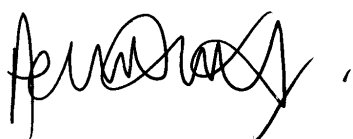
We strongly support the proposed increase in fees for householder applications to achieve cost recovery. However, it is not clear what evidence the consultation is relying upon in proposing an increased fee of £528. To our knowledge, none of our three councils have been asked for or provided information in respect of the costs associated with these types of applications.

We would also urge caution in introducing a regime of local fee setting for planning applications. Whilst there is a logic to doing so, we are concerned that this may introduce the potential for perverse disincentives for growth where markedly differing fees are charged in neighbouring authorities.

When considering planning fees more widely, we would encourage the Government to set a regime that allows full cost recovery as a service. This should take into account the complexity of some applications (such as variations of conditions), free applications (such as Listed Building Consent applications) and wider service costs (such as ecology and heritage).

I trust the above response is helpful. If you would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,



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