

**Joint Response of Gloucestershire Local Planning Authorities, Stroud District Council, Forest of Dean and Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council (the Strategic and Local Plan authorities) to the National Planning Policy Framework Consultation**

**Submission is on behalf of Local Planning Authority Officers representing the above authorities.**

**Closing date: 10 March 2026**

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## **1. Introduction**

This joint response is submitted on behalf of several local planning authorities (LPAs) in Gloucestershire at officer level. It reflects our combined professional experience in plan-making, development management, climate strategy, infrastructure planning and environmental assessment across a county with a uniquely sensitive, diverse and strategically important geography.

Gloucestershire is home to:

- the **Cotswolds National Landscape**,
- the **River Severn floodplain**,
- **ancient woodland**, nationally and locally designated habitats and species,
- the **M5 transport corridor** serving regional and national movements,
- internationally significant heritage including **Roman Gloucester**, **Regency Cheltenham**, and **medieval Tewkesbury**, and
- a network of market towns, rural villages and strategic employment hubs.

Balancing the need for new homes, jobs, social infrastructure and economic growth with the requirement to protect landscapes, heritage, biodiversity, floodplains and local distinctiveness requires a planning framework that is both clear and consistent, yet flexible enough to respond to local context.

The Government's consultation contains 225 questions, given the complexity of the questions, themes and responses, this response adopts a blended approach:

- Detailed responses where issues align closely with our corporate priorities (climate change, land use efficiency, housing, design, biodiversity, infrastructure).
  - Strategic commentary across wider policy themes.
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## **2. Responses by Theme**

### **A. FORMAT, STRUCTURE AND STATUS OF NATIONAL POLICY**

#### **A1. Presentation and structure of the draft NPPF**

The move from descriptive text to clear, discrete numbered policy statements is welcome. It increases clarity, usability and consistency. However, the shift towards a more rules-based format, without the counterbalancing effect of statutory National Development Management Policies (NDMPs), risks creating rigidity without certainty. This opens up inconsistency in application nationally and places the burden on clarification through appeal or the courts. This is unhelpful if the focus is upon speeding up the planning system and decision making.

Local authorities will continue to rely heavily on interpretation, especially in areas such as:

- net zero and energy efficiency standards,
- biodiversity and nature recovery,
- flood risk and climate adaptation,
- design quality and place-shaping.

The framework must explicitly safeguard space for local interpretation that reflect place based priorities and higher local standards where justified.

#### **A2. Statutory NDMPs — a missed opportunity**

Statutory NDMPs would offer:

- meaningful simplification,
- clearer division between national and local policy,
- reduced duplication in Local Plans,
- improved consistency across England.
- clearer expectations for developers and communities

Without statutory status, NDMPs cannot perform this role effectively. Their absence undermines the attempt to deliver a genuinely streamlined planning system and questions the timeframes set out to produce 'simpler local plans'.

#### **A3. Transitional arrangements**

Local Plans already in preparation require protection from immediate obsolescence. Transitional arrangements must:

- avoid destabilising work already underway,
- permit plans nearing completion to proceed to adoption and not be out of date as soon as they reach approval,
- guarantee a period of certainty for delivery of homes, jobs and infrastructure.

## **B. THE PLANNING FRAMEWORK**

### **B1. Spatial Development Strategies (SDSs)**

We strongly support the re-establishment of strategic planning. Since the removal of Regional Spatial Strategies and Structure Plans, strategic issues have been left unresolved, especially in counties like Gloucestershire where cross-boundary considerations can dominate.

SDSs must:

- be focussed only on the very strategic issues
- focus on cross-boundary and regional matters,
- not duplicate local detail,
- clearly define what is “strategic” versus “local”,
- plan for strategic infrastructure on regional scales, particularly the M5,
- align with Government funding streams to ensure delivery.

Without clear national guidance on the division of responsibilities between SDSs and Local Plans, there is a real risk of overlap, duplication or gaps.

Until SDSs are operational, Local Plans may stall. Robust transitional guidance is essential to ensure that local plans being prepared now in advance of SDS’s retain the soundness.

### **B2. Local Plans**

We support the ambition for shorter, more agile Local Plans, but this is dependent upon:

- clarity in NDMPs,
- functioning SDSs developed within clear parameters,
- proportionate evidence requirements,
- adequate resourcing across planning functions for planners, supporting specialists and delivery of technical evidence.

Mandatory housing targets are understood, but they reduce scope for local discretion. In Gloucestershire, where constraints are considerable, landscape, flood risk, heritage, biodiversity, such discretion is vital. New local plans may fail in totality where full housing numbers can't be met, while they may succeed through reduced but strongly evidenced reduced numbers.

### **Evidence and proportionality**

In practice, despite repeated references to “proportionate evidence”, the burden on LPAs has increased, not decreased. The availability of skills across local government is well evidenced and this places a heavy reliance and high cost burden on agency workers and consultancy work. This is not a sustainable nor value for money model. In addition examinations remain highly demanding, lengthy and expensive.

### **Community involvement**

The pivot towards faster plan-making risks further marginalising under-represented communities and those communities considered ‘hard to reach’. This includes engaging with young people – the very population we are planning for their future.

To improve engagement, Government should support:

- enhanced digital tools and the targeted funding for these,
- accessible consultation materials,
- greater in-person outreach,
- better resourcing for engagement.

### **B3. Neighbourhood Plans and Supplementary Plans**

Neighbourhood Plans perform a valuable role but require:

- clearer alignment with NDMPs, SDSs and Local Plans,
- clarity on permissible scope (especially regarding design, climate and biodiversity),
- support for ensuring communities have sufficient capacity to participate.
- currently the role of neighbourhood plans is unclear

### **B4. Developer Contributions**

We recommend:

- clearer alignment between IDPs, SDSs and NDMPs,

- improved national funding for strategic infrastructure,
- clarity regarding viability testing, prioritisation and review mechanisms.
- clarity on the future role of s106 vs CIL

## **C. DECISION-MAKING POLICIES**

### **C1. Determining development proposals**

DM policies remain non-statutory material considerations. In practice, new national policies will override Local Plans, reducing local discretion, especially problematic in constrained areas such as Gloucestershire.

Concerns include:

- **DM3** suggests decisions should not be delayed for consultee input; this oversimplifies real-world considerations and risks poor decision-making.
- Clarity on statutory consultees and the role and function of non statutory consultees

### **C2. Planning conditions and obligations (DM6)**

No substantive change. We note, however, the need for alignment with climate policy and EDPs.

### **C3. Development viability (DM5)**

We support explicit endorsement of review mechanisms where contributions fall below policy requirements.

### **C4. Article 4 Directions & Enforcement (DM8)**

The proposal to give “substantial weight” to intentional unauthorised development risks undermining lawful, policy-based decision-making. Planning decisions must rest on planning merits alone.

## **D. CLIMATE CHANGE POLICY**

Climate change and the environment is one of Gloucestershire’s core priorities, and the NPPF must be aligned with statutory carbon budgets and local net zero pathways.

The introduction of SDSs, with long-term spatial visions, heightens the importance of ensuring new development is compatible with future climate scenarios and net zero requirements.

### **D1. PM13 – Setting local standards (Integrated Narrative)**

We strongly oppose policy PM13, particularly the proposal to commence s.43 of the Deregulation Act 2015, which would restrict local planning authorities from setting higher energy efficiency standards for new buildings.

Key concerns:

- The UK’s legally binding sixth and seventh carbon budgets require rapid decarbonisation of buildings.
- The buildings sector must reach near-zero carbon in the 2040s without offsetting.
- Future Homes Standards and current Building Regulations are not aligned with these statutory requirements.
- Preventing LPAs from setting local standards undermines their ability to support national and local net zero trajectories.
- Limiting local standards increases the retrofit burden, imposing long-term costs on homeowners, registered providers, and the public sector.
- Local standards already adopted across England show consistency, contradicting claims of “variation”.

PM13 also conflicts with CC2 (climate mitigation) by preventing LPAs from implementing standards necessary for meaningful emissions reduction.

A prohibition on local energy standards is inconsistent with:

- the need for climate resilience,
- the long-term aims of SDSs,
- and a just transition for vulnerable communities.

### **D2. CC1 – Planning for Climate Change**

We welcome the increased emphasis on recognising climate risks, including wildfires, but consider the overall approach to be worryingly regressive compared with the 2024 NPPF.

Key issues:

- restricting “radical reductions in greenhouse gas emissions” solely to spatial strategies and allocations is too narrow.
- design, construction, adaptation, infrastructure and materials, all outside spatial strategy, must contribute.
- the policy lacks detailed guidance on carbon assessment methodologies, leading to inconsistency and reduced transparency.
- greater clarity is needed on how LPAs should address specific adaptation risks and climate-sensitive design principles.

Climate policy must be integrated across the NPPF, not siloed into one section.

## **E. HOUSING DELIVERY**

Key themes:

- the need for infrastructure-led planning,
- realistic delivery trajectories,
- alignment with geography, constraints and character.
- there needs to be more triggers in the NPPF for LPAs to ensure land banking or throttling of sites isn't taking place, the national housing number are only deliverable if developers don't constrain supply. Currently there is nothing allowing LPAs to enforce delivery.

## **F. ECONOMY, TOWN CENTRES, DESIGN AND LAND USE**

### **F1. Town Centres**

We support design guides, codes, masterplans and Article 4 Directions to:

- promote upper-floor residential uses,
- enhance public realm,
- enable incremental regeneration,
- manage service needs (bins, bikes, access),
- retain high-quality shopfronts and heritage.

## **F2. Design (DP2, DP3)**

We recommend:

- strengthened wording on context assessment,
- clarity on when prescriptive design requirements are appropriate,
- explicit emphasis on building re-use,
- accredited multidisciplinary design review.

## **F3. Making Effective Use of Land (L1–L3)**

We strongly support higher densities where appropriate, with improvements including:

- linking minimum density standards to public transport viability thresholds,
- acknowledging district/local/neighbourhood centres,
- defining density metrics (net/gross),
- clearer use of CPO powers for regeneration,
- more ambitious densities around major stations and urban transport hubs

Parking standards should be secondary in sustainable locations.

## **G. NATURAL ENVIRONMENT (N1–N6)**

Key themes:

- opposition to weakening BNG and local discretion,
- stronger requirements for network-scale ecological enhancements,
- safeguards against over-reliance on EDPs,
- clarity on protected landscapes and designated sites.

## **H. FLOOD RISK AND COASTAL CHANGE**

We support:

- expanded detail and clearer structure,
- emphasis on future flood risk,

- SuDS and natural flood management,
- flexibility to improve resilience in redevelopment.

### **3. Conclusion**

The Gloucestershire planning authorities support the ambition for a more streamlined planning system, but the NPPF must:

- safeguard local discretion,
- strengthen climate and nature requirements,
- ensure realistic transitions,
- align strategic and local plan functions coherently,
- empower meaningful community involvement,
- support design quality and sustainable infrastructure.
- allow LPAs to set local standards that are higher than national where evidence, viability and deliverability can be demonstrated.

We welcome continued dialogue with Government and stand ready to engage as the NPPF is finalised.