



## Cheltenham Civic Society response to the 106 consultation questions about the Government's planning reforms

Question in the consultation document	Response
Chapter 3 – Planning for the homes we need	
<p><i>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?</i></p> <p><i>Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?</i></p> <p><i>Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</i></p> <p><i>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</i></p> <p><i>Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?</i></p> <p><i>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</i></p> <p><i>Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</i></p> <p><i>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</i></p>	<p>We support the objective to better meet housing needs and design for a higher density in our town centre, but we feel that the absence of specific measures or policy solutions will lead to little or no change from the current model.</p> <p>There is no discussion of <b>mixed tenures</b> and we are concerned that the proposed changes will lead to the continuation of developer-led provision, with house size, design, and price that do not meet local needs and often downgrade the liveability and character of our town. While we argue below for more capacity to assess those needs, we argue here for <b>much more imaginative solutions</b> to the challenge of housing supply, including ownership and rental models that include cooperatives, shared ownership, and innovative and high design and sustainability standards. This is what keeps profit local and creates thriving communities where people want to live and work.</p> <p>We also ask that the following points are considered:</p> <ul style="list-style-type: none"> <li>• The discontinuity between administrative and geographic boundaries means that is often impossible to achieve the housing target without close cooperation between neighbouring authorities. In Cheltenham's case we are tightly bordered by other authorities and the AONB. We welcome steps for closer <b>strategic alignment</b> between Cheltenham,</li> </ul>

Question in the consultation document	Response
<p><i>Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</i></p> <p><i>Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</i></p> <p><i>Question 11: Do you agree with the removal of policy on Annual Position Statements?</i></p> <p><i>Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</i></p> <p><i>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</i></p> <p><i>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	<p>Gloucester, Tewkesbury Districts and Gloucestershire County Council and we would also support wider, sub-regional or regional strategic planning, without losing (and ideally strengthening) democratic accountability and civic engagement.</p> <ul style="list-style-type: none"> <li>• We expect our forthcoming local SLP to set out how the <b>housing targets</b> will be achieved for the sub-region and, specifically, how <b>applications will be assessed</b> to achieve the best outcomes for each geographic centre as well as the wider region. This also applies to infrastructure provision and design issues which have not been well-addressed in the past.</li> <li>• Increased density should not be driven without taking account of the existing <b>character</b> of the area affected. Words to this effect should be inserted into the NPPF.</li> <li>• Higher density must not be at the expenses of <b>valuable greenspace</b> in or near towns; and higher density developments should be designed to facilitate protection and revival of green spaces.</li> </ul> <p>We strongly support the use of <b>design codes</b> to explain these details and we request that 'high-quality design' should be included as a requirement for development. Design has too long been sacrificed and we would like to see a revival of housing design that meets and local needs and facilitates thriving communities.</p> <p>We support the presumption in favour of sustainable development, but we note that this phrase can be used as an excuse for environmentally unsustainable development. There is a need to <b>require minimum sustainability thresholds</b> and a stronger commitment to <b>social outcomes</b> e.g., affordability.</p>

Question in the consultation document	Response
	<p>Construction is one of the most carbon-polluting industries and we do not see a strong enough commitment in the consultation document to requiring the use of <b>sustainable methods and designs</b>. There is an opportunity here and we request better.</p> <p>We also see an opportunity, perhaps outside the scope of this consultation, to enhance <b>productive local economic and employment activity</b> and we hope public consultation is being done in parallel with negotiations with other government departments and relevant bodies.</p> <p>Removing the urban uplift creates opportunities for towns like Cheltenham but we note that <b>land supply</b> must be addressed as a tight supply of appropriate land will likely create upward price inflation, dampening any affordability benefits, and continuing to transfer wealth away from poorer households to asset owners. We do not believe this is consistent with the government’s overall objective to facilitate productive economic activity and we ask for measures to reduce rent- or profit-seeking behaviour.</p>
<p>Chapter 4 – A new Standard Method for assessing housing needs</p>	
<p><i>Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?</i></p> <p><i>Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method’s baseline, is appropriate?</i></p> <p><i>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</i></p>	<p>We support an increased focus on and weighting of <b>affordability</b> (but see following paragraph). We support policies that create a <b>general levelling of house prices</b> in line with incomes and, as stated above, we believe that <b>mixed tenure</b> and increased long-term rental provision will make a stronger and lasting contribution to this aim and we request this is given more attention in the proposals.</p> <p>Currently defined ‘affordable’ housing is often <b>too expensive</b> for many families. It is extremely unlikely that changes to the planning regime on their own will have a significant effect on house prices or bring them</p>

Question in the consultation document	Response
<p><i>Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</i></p> <p><i>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</i></p>	<p>within reach of many more households. While the supply of permission is of course one factor in determining price, there are existing planning permissions for well over one million dwellings, which remain unbuilt. House prices have been driven up by non-planning factors, such as the following: a general inflation of asset prices through monetary policy (including interest rates and QE); general inflation in the price level; business decisions by developers who restrict land release and house construction; substantial increases in demand driven by very high levels of net migration in recent years; labour shortages in the construction sector; and in some areas, purchases of dwellings as assets by foreign investors. DHCLG must also consider appropriate <b>safeguards and interventions</b> to give local authorities or central government appropriate powers of intervention and consider how to maximise the public gain rather than the private one.</p> <p>High-level housing targets at LA level are often unrealistic (because of geography etc) as noted above, nor do they make any assessment of the granularity of need, demographics, household composition, income, tenure, etc. We are concerned that small authorities, such as Cheltenham, do not have the capacity to conduct this detailed assessment, and one result of this has been a developer-led approach and executive ‘box’ homes, demanding high prices and often with poor design, character, and sustainability credentials. We would support <b>guidance on an optional methodology</b> that would equip local authorities to assess this and allow local residents and civic groups to understand and engage with this critical part of the new proposals.</p> <p>There is also an essential role for <b>action on tenure</b>, including mixed tenures, an increase in social housing and other long term rental</p>

Question in the consultation document	Response
	provision to make housing genuinely affordable to those on median or lower incomes.
Chapter 5 – Brownfield, grey belt and the Green Belt	
<p><i>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</i></p> <p><i>Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?</i></p> <p><i>Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?</i></p> <p><i>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</i></p> <p><i>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</i></p> <p><i>Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?</i></p> <p><i>Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?</i></p> <p><i>Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?</i></p>	<p>We strongly support the principle of <b>brownfield first</b>, but request that high standards of quality, design, and sustainability be required. We would ask for clarification of how “brownfield passports” will work.</p> <p>However two cautions:</p> <ul style="list-style-type: none"> <li>i) Brownfield sites frequently have <b>heritage value</b>, which can be recognised and modelled through design or adaptation rather than redevelopment, and while this requires more imagination it also creates much more interesting and beautiful results, adding immense social and economic value.</li> <li>ii) Also some brownfield sites in urban areas are valuable <b>habitats for wildlife</b> and need protection. We hope that the government will take the opportunity to require that planners and developers maximise these opportunities. Such areas can form parts of green corridors, which link also with parks, nature reserves and allotments. We hope that the revised NPPF explicitly encourage this approach as part of a renewed drive to improve green infrastructure in towns.</li> </ul> <p>The reference to brownfield sites should refer also to the need to develop planning policies at LA level on the of redundant shops and floors above shops for housing or other purposes.</p> <p>We have some concern that the proposals on <b>grey belt</b> could extend poor quality land-use in the urban fringe and extend this into what is now green belt. There is a risk of <b>intentional degradation</b> of green belt land</p>

Question in the consultation document	Response
<p><i>Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?</i></p> <p><i>Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?</i></p> <p><i>Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</i></p> <p><i>Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?</i></p> <p><i>Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?</i></p> <p><i>Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</i></p> <p><i>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</i></p> <p><i>Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?</i></p>	<p>so that it become future grey belt land with associated financial value at the cost of other factors. Provision to refuse development on sites that have been wilfully allowed to degrade should be included.</p> <p>When it comes to <b>green belt</b> we support clear policy direction and commitment to the presumption of preservation by utilising grey belt first.</p> <p>For us in Cheltenham, the issue of the <b>green belt</b> raises an important strategic question as its present function is to keep Cheltenham and Gloucester separate. Any change in this role should be the subject of civic engagement and democratic processes.</p> <p>Additionally, we encourage the government to ask local authorities and other stakeholders to set out strategies for the <b>positive use of green belt</b> land to create varied and imaginative opportunities for agriculture, forestry, nature recovery etc., such was done with the National Forest some years ago. These can significantly enhance quality of life and create additional economic, social, and environmental opportunities.</p> <p>We believe that high quality farmland should not be used for <b>solar farms, and that the siting of all new energy infrastructure</b> should take account of the landscape impact. We need government encouragement to make sure that much more solar PV is installed: i) on suitable industry and warehouse roofs, ii) on <u>all</u> suitable roofs in new development, and iii) on other sites in towns, such as over car parks and on railway land. There is massive, underused potential to help meet the government's net zero targets in this this way, and planning policy is an important tool to support this aim.</p> <p>We also ask for consideration of how to maximise constructive and participatory <b>civic engagement</b> in the development of plans.</p>

Question in the consultation document	Response
<p><i>Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</i></p> <p><i>Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?</i></p> <p><i>Question 38: How and at what level should Government set benchmark land values?</i></p> <p><i>Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?</i></p> <p><i>Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?</i></p> <p><i>Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?</i></p> <p><i>Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered ‘not inappropriate’ in the Green Belt?</i></p> <p><i>Question 43: Do you have a view on whether the golden rules should apply only to ‘new’ Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?</i></p>	<p>Consultation exercises are often done poorly, resulting in a lack of trust and respect between the planning authorities and communities.</p> <p>We support increasing targets for affordable housing, but request that this is not just for green belt sites but is a <b>whole-town approach</b> so that provision of services, eg transport, can be an integrated part of town planning, alongside mixed, diverse-tenure housing development. Higher density housing in urban centres should be considered before development on the green belt, and we would expect to see this in the SLP for our sub-region.</p> <p>We strongly support the <b>‘public benefit’</b> rules with the proviso that places are well planned and vision-led, which may include, as noted above, higher targets in town centres where transport—especially sustainable transport—links.</p> <p>We support the setting of <b>benchmark land values</b> or other mechanisms to prevent or tax speculation by developers and landowners.</p>

Question in the consultation document	Response
<p><i>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</i></p> <p><i>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</i></p> <p><i>Question 46: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	
Chapter 6 – Delivering affordable, well-designed homes and places	
<p><i>Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?</i></p> <p><i>Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?</i></p> <p><i>Question 49: Do you agree with removing the minimum 25% First Homes requirement?</i></p> <p><i>Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?</i></p> <p><i>Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</i></p> <p><i>Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?</i></p> <p><i>Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?</i></p> <p><i>Question 54: What measures should we consider to better support and increase rural affordable housing?</i></p>	<p>As stated above we strongly support a <b>mix of tenures, types and ownership</b> and we would like to see local authorities empowered and required to deliver this. The current system has incentivised developer-led provision, often resulting in homogeneity, poor design, lack of community and green space, frequently poorly served by transport and infrastructure because of a lack of vision-led planning. Plans and design briefs can more clearly set out what mix of housing tenures is expected, and applications can be more rigorously scrutinised to make sure they can and will deliver this. The current system has failed here and, while central control is not the solution, we think more can be done to build capacity at local level to plan and deliver these targets, and good practice can be encouraged and shared.</p> <p>Alongside any support for <b>First Homes</b> we see challenges with ownership-driven approaches and would like to see an expansion of affordable, long-term, high-quality rental provision or incentives or promotion of other well-evidenced solutions such as cooperative ownership and social rented homes. In general, we note the lack of imagination and the poor use of evidence in this part of the framework.</p> <p>We support proposals that define affordable as a function of <b>median local incomes</b>, this is especially critical for areas with high housing</p>



Question in the consultation document	Response
<p><i>Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?</i></p> <p><i>Question 56: Do you agree with these changes?</i></p> <p><i>Question 57: Do you have views on whether the definition of ‘affordable housing for rent’ in the Framework glossary should be amended? If so, what changes would you recommend?</i></p> <p><i>Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?</i></p> <p><i>Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?</i></p> <p><i>Question 60: Do you agree with proposed changes to policy for upwards extensions?</i></p> <p><i>Question 61: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	<p>prices, such as Cheltenham and rural areas particular in the Cotswolds AONB.</p> <p>Affordability should not mean that design is compromised—affordable provision should be well-designed and integrated and <b>good design should be ownership neutral</b> (i.e., the casual visitor should not be able to tell what kind of tenure exists). This also applies to standards for environmental sustainability in affordable homes, for example by ensuring that plots allow space for trees and have minimum space standards equivalent to the former Parker Morris requirements.</p> <p>We would place more emphasis on <b>integration</b> than zoning, which can lead to ghetto-isation and create ugly buildings which suffer from neglect and lack of respect.</p> <p>We believe that the <b>shortage of planning staff</b> makes it easier for big house builders to get their schemes waived through to meet housing targets.</p> <p>We think it is a huge mistake to remove ‘<b>beauty</b>’ from the NPPF; it’s well known that more attractive places contribute to thriving communities and flourishing economies, ‘beauty’ creates additionality, it need not restrict or limit the objective of increasing housing supply. We encourage reconsideration of this and, going further, that LPAs should be required to document what ‘beauty’ means in a local context through their plans and design briefs. Creating beautiful places is an aim that people would rightly expect planning officers to aspire to.</p> <p>On the specifics, the definition of mansard roofs is unclear. These are sloping with small windows inserted into the roof, not vertical walls and windows, which often include a narrow balcony around the structure. Mansard roofs create minimal overlooking of neighbouring properties.</p>

Question in the consultation document	Response
	<p>Whereas vertical upward extensions have a major overlooking implication.</p> <p>Design changes, such as these, that have implications for solar gain and heat loss should only be agreed where construction is sufficiently insulated and no air-conditioning is or will be required.</p> <p>Upward extensions in conservation areas must be guided by conservation area considerations and listed buildings consent should still be required for listed properties. This can easily be the subject of a local design brief.</p>
<ul style="list-style-type: none"> <li>Chapter 7 – Building infrastructure to grow the economy</li> </ul>	
<p><i>Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</i></p> <p><i>Question 63: Are there other sectors you think need particular support via these changes? What are they and why?</i></p> <p><i>Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?</i></p> <p><i>Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?</i></p> <p><i>Question 66: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	<p>We appreciate the objective for <b>economic growth</b> but do not believe this should be at the cost of the importance of <b>tackling the climate crisis</b>, nor should it ignore local character and the opportunity for innovative and attractive design.</p> <p>We support the development and application of <b>design standards</b>, guidance and sharing of good practice.</p> <p>We hope that these changes do not open the door for economic activity that has negative environmental impacts and creates poor quality jobs, and we would like to see more analysis and ways for communities to engage here.</p>
<p>Chapter 8 – Delivering community needs</p>	

Question in the consultation document	Response
<p><i>Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?</i></p> <p><i>Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?</i></p> <p><i>Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?</i></p> <p><i>Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</i></p> <p><i>Question 71: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	<p>We interpret <b>vision-led</b> as meaning cities and towns planned to deliver sustainable transport with more pedestrianisation and non-motorised transport. If this is what is meant, then we strongly support these proposals: we want to see transport design based on <i>public</i> transport and green technologies, with <i>active</i> forms of transport (bikes, walking etc) taking priority over car routes, and car use restricted or taxed, without disadvantaging lower-income households or those with other needs. We hope local authorities will respond boldly to this opportunity and take seriously the task of reducing the number and miles done by cars and other polluting transport. We want local authorities to experiment and share good practice and hope the framework will encourage this.</p> <p>Evidence from other European cities and towns is compelling, showing that small changes, quickly implemented and able to be adapted, have resulted in long-term significant impact, and yet we lag far behind in these areas.</p> <p>Given the division of responsibilities between district and county we expect better cooperation between CBC and GCC and greater community involvement.</p> <p>We believe that these proposals should be an opportunity to <b>build communities</b> not simply to build housing. Green areas contribute to the <b>health and wellbeing</b> of humans, as well as the wildlife, and high-standard provision should be required to be designed in.</p>
Chapter 9 – Supporting green energy and the environment	

Question in the consultation document	Response
<p><i>Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?</i></p> <p><i>Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</i></p> <p><i>Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?</i></p> <p><i>Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?</i></p> <p><i>Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?</i></p> <p><i>Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?</i></p> <p><i>Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?</i></p> <p><i>Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?</i></p> <p><i>Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?</i></p> <p><i>Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?</i></p>	<p>We strongly support the expansion of <b>renewables and low carbon energies</b>, but we feel the proposals miss some key opportunities.</p> <ul style="list-style-type: none"> <li>• There is a significant opportunity to maximise renewable energy provision by utilising existing roof spaces, especially those in industrial estates, for solar power, and we request that adaptation and requirements on new builds be included in the NPPF. Likewise there is scope to cover urban car parks, railway land etc, with solar PV canopies. And all new development should be required to incorporate solar PV as a matter of course.</li> <li>• The proposals miss the opportunity to value, preserve, and enhance <b>urban wildlife habitats</b>, and areas of wildlife within urban areas; and could do more to stress the importance of green and blue infrastructure in the development and renewal of towns.</li> <li>• We want to ensure that the changes <b>protect our heritage fabric</b>, while facilitating adaptation, for example requiring changes to be completely reversible as technology develops.</li> </ul> <p>In Cheltenham there is a specific <b>SPG on climate change</b>, which we welcome, and believe is a model for what the LPA can develop in other areas.</p> <p>Other considerations, such as flood risk management, standards for new buildings to account for climate changes and energy efficiency, should not be set aside or given a lower priority to meet the housing targets. As we have said elsewhere there is a significant opportunity for high-quality design and build in ways that meet <b>multiple objectives</b> and we hope that some of the safeguards for this will go further than is currently drafted.</p>

Question in the consultation document	Response
<p>Question 82: Do you agree with removal of this text from the footnote?</p> <p>Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?</p> <p>Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?</p> <p>Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?</p> <p>Question 86: Do you have any other suggestions relating to the proposals in this chapter?</p>	
Chapter 10 – Changes to local plan intervention criteria	
<p>Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?</p> <p>Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?</p>	No comment.
Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects	
<p>Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?</p> <p>Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.</p>	<p>We find this proposal very interesting, and we support the implementation of <b>experimentation</b> and intelligent thinking here. We comment that:</p> <ul style="list-style-type: none"> <li>• In terms of the presumption that larger developments are already covering their assessment costs, we note that current assessments are not necessarily fit for purpose and more thorough <b>scrutiny</b> may be needed to safeguard the standards we propose elsewhere.</li> </ul>

Question in the consultation document	Response
<p><i>If Yes, please explain in the text box what you consider an appropriate fee increase would be.</i></p> <p><i>Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?</i></p> <p>Yes  No – it should be higher than £528  No – it should be lower than £528  no - there should be no fee increase  Don't know</p> <p><i>If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.</i></p> <p><i>Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.</i></p> <p><i>Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.</i></p> <p><i>Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?</i>  Please give your reasons in the text box below.</p> <p><i>Question 95: What would be your preferred model for localisation of planning fees?</i></p> <p><i>Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.</i></p> <p><i>Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.</i></p>	<ul style="list-style-type: none"> <li>• We support the use of <b>variable fees</b> to incentivise or deter certain types of applications. LPAs could use this as one of their levers to encourage, eg climate-friendly development, or deter less desirable proposals.</li> <li>• We see the proposed increase as modest and can see advantages in experimenting with a wider scale of charges that is more imaginative than pure 'cost recovery' or 'fairness'.</li> <li>• It's unclear if the 'planning applications' services referred to include eg the enforcement regime (which is often failing badly), or the production of guidance and design guides, principles or technical advice. We hope that cost recovery can support these functions which, ultimately, strengthen and simplify development control, saving time (and cost) for applicants and planning officers.</li> <li>• Generally, we support greater variability at local level and for this to be done on a pilot or experimental basis, supported by rapid evaluation, done in a way that lessons can be shared across the UK. We would like to see much more experimentation in various areas of delivery such as testing various forms of housing tenure, encouraging renewable energy in urban areas and the creative use of planning fees. However, some LPAs may have limited capacity to do this and some central support or guidance could be helpful.</li> </ul> <p>We note the <b>transitional arrangements</b> and, given that Cheltenham has had an historic shortfall, we underline the comments in the first two sections above. This isn't simply a matter of giving LPAs more time to come up with plans: that time should be used for real cooperation between neighbouring authorities for plans that are sensible for the</p>

Question in the consultation document	Response
<p><i>Neither Don't Know Please give your reasons in the text box below. Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services? If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees? Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced? Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made. Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs? Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.</i></p>	<p>geography and work with the existing administrative boundaries, both strategically, and at the level of assessment.</p> <p>There should also be genuine and deep engagement or re-engagement with civic groups and communities. There is much good practice that could be brought to these processes that is currently ignored or under-utilised.</p>

Question in the consultation document	Response
<p><i>Question 102: Do you have any other suggestions relating to the proposals in this chapter?</i></p> <p><i>Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</i></p>	
Chapter 12 – The future of planning policy and plan making	
<p><i>Question 104: Do you agree with the proposed transitional arrangements?</i></p> <p><i>Question 105: Do you have any other suggestions relating to the proposals in this chapter?</i></p>	<p>We strongly support increased participation and involvement—genuine involvement—of groups like ours and other civic and community groups. This goes beyond consulting on plans. We would like to see LAs take advantage of “citizen science” (e.g., to monitor trends in the use of facilities), to draw on the specialist knowledge held in the community (e.g., on nature conservation or heritage buildings), and using community skills and knowledge (e.g., in shaping design guidance and conservation area policies). More, and more constructive engagement, would create better understanding, and deeper dialogue between citizens and local government.</p> <p>We note the rhetoric in the preamble about <b>involving communities</b>, cross-boundary cooperation, strategic thinking, etc, and we hope that the government will find ways to make this meaningful and real at a local level, and be able to hold local authorities to account when it can be demonstrated they are not meeting these standards.</p>
Chapter 13 – Public Sector Equality Duty	
<p><i>Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on</i></p>	<p>Planning should speak for those things that do not have an obvious financial voice: the heritage of our towns, nature, beauty and the needs of</p>



Question in the consultation document	Response
<p><i>anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?</i></p>	<p>future generations. In meeting the urgent need for more housing, these essential qualities of civilised living and successful planning must not be lost sight of.</p>

**20 September 2024**