



## Summary of the Civic Society's views on the proposed changes in the NPPF<sup>1</sup>

### We welcome the following aspects of the consultation document:

- The emphasis on the central role of up-to-date plans in setting direction for development.
- The importance given to strategic and regional planning - critical for Cheltenham where geographic and administrative boundaries do not align.
- The 'brownfield first' policy for new housing which could be widened to an 'urban-first' approach.

### We believe that the proposals are lacking in some areas:

- A true commitment to 'sustainable' development, would have included a strong message about the need for a sustainable construction sector.
- There should be a requirement, or a methodology, for assessing housing demand below the top-level numbers. More granular assessments are needed if local provision is to meet local demand.
- The proposals suggest a rather naïve belief in the ability of the current developer-led profit-driven model to deliver affordable housing. What is lacking are innovative proposals for a variety of delivery and funding solutions.

### We oppose the following aspects:

- The removal of references to 'beauty'. This proposal could be used to justify ugliness: it should be dropped.
- The near total absence of references to heritage similarly downplays an important asset which helps communities to flourish and local economies to thrive. This is especially important in towns like Cheltenham that have a rich heritage.

### These aspects of the proposals require more consideration:

- **Housing**: five principles develop the idea that quality is as important as quantity:
  - the right kind of homes should be built that march need
  - the design of new homes should be of the highest standard
  - the highest sustainability standards are required throughout

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<sup>1</sup> This is a summary of the Civic Society's response to the Government's proposals. Our detailed Position Statement and our answers to the Government's questions about them, can be found on the society's website <https://cheltenhamcivicsoc.org/>

- the emphasis should be on creating communities as much as hitting house building targets
- places to live need generous amounts of green space (gardens, trees, open space, water and natural areas).

**Green Belt:** there are some risks in the proposals for the Green Belt, unless the idea of 'grey belt' land is tightly defined. The role that the Gloucester and Cheltenham Green Belt play in keeping the two towns apart should not be undermined.

**Planners and profession:** the increased emphasis on professionalisation and the potential innovations around planning fees are welcome, but the proposal to increase the number of planners by 300 does not meet the scale of the challenge.

**Renewable energy:** there is a significant missed opportunity for greatly expanding roof top solar in towns.

**Public engagement:** this section ignores the potential for truly participatory methods of engagement and wrongly implies that all resistance to new development is driven by NIMBY considerations.