

The response of the Planning Forum of the Cheltenham Civic Society to proposals for Local Government Reorganisation in Gloucestershire

The Government's English Devolution White Paper proposes Local Government Reorganisation (LGR) across many counties. In Gloucestershire, this would involve replacing the existing county and six districts (including the Borough of Cheltenham) with a larger unitary authority or authorities responsible for all local services.

We have prepared this response to the government-led consultation currently underway¹.

In this note we set out:

- a list of considerations which should guide those shaping the future of local government in Gloucestershire,
- a few comments on the options offered in the consultation,
- a set of principles and specific suggestions as to how planning and related matters might be handled in Cheltenham, if a unitary authority were to be established.

Considerations that should guide local government reorganisation

Many questions are raised by the proposal for local government reorganisation (LGR) in Gloucestershire, such as democratic accountability, financial and other efficiencies, historic association and a sense of local identity. In the context of planning – a particular concern of the Cheltenham Civic Society – we note that in future planning at the strategic level will be done through spatial development strategies, that is a “high-level documents focused on genuinely strategic, cross-boundary issues, leaving detailed policy to other plans” (from the new draft National Planning Policy Framework). We hear our spatial strategy may be prepared by a new mayoralty covering Gloucestershire, Worcestershire and Herefordshire; or linked in some way to Bristol. Indeed, Gloucestershire has associations with both the West Midlands and the Bristol/Bath conurbations. It is unhelpful that there is this uncertainty at the strategic planning level of local government as well that arising within the county from proposals for LGR.

¹ <https://www.gov.uk/government/consultations/local-government-reorganisation-in-gloucestershire/proposals-for-local-government-reorganisation-in-gloucestershire>

In looking at the options for LGR in Gloucestershire we have taken these considerations into account:

- **Subsidiarity:** local planning should be done as near to the people affected as possible.
- **Democratic fit:** local planning should serve local communities who share a sense of identity and community cohesion (the clue is in the word 'local'). History matters: in the past bodies that were created for efficiency reasons alone were abandoned because they ignored history and did not have this democratic fit (e.g., the former County of Avon, and the combined Worcestershire and Herefordshire).
- **Clarity of delivery:** two tiers of local government can cause confusion, be hard to understand, and lead to duplication and buck-passing. In Cheltenham for example, trees in streets and those next to them in parks are the responsibility of different bodies. However, the problem may not be so much the existence of different tiers as failure to clarify the responsibility for different functions, poor communications and 'turf' arguments. Also common sense solutions have not been applied to obvious nonsenses.
- **Service:** the elected members and the staff of the local planning authority are the servants of the electors. If they are to be deliver a good planning service, they need to have knowledge of, and contact with, the people they serve. Local authority services need to be available in local areas, and local people should be able easily to contact (and, if necessary, meet in person) their elected representatives and their staff; so, questions of physical accessibility are important too.
- **Economic unity:** no area will be entirely self-sufficient but it's fair to ask: "does the area broadly align with where people live and use public services, and largely reflect local labour markets"? The present boundaries of Cheltenham Borough and Tewkesbury District, for example, no longer bear much relation to economic reality. Yet our experience of trying to engage with JCS and the Strategic and Local Plan shows how difficult it can be for the public to address issues that cut across local authority boundaries.
- **Functional viability:** can the local planning authority support the number of planners they need, including for sick leave, resignations etc? We have

seen that a lack of resilience in the Cheltenham planning department has been a recurring problem.

All these considerations should have been borne in mind when the government approached LGR. We fear, though, that matters like democratic fit and service to citizens – which argue strongly for a less centralised solution - have been subordinated to a belief in the economies of scale and short-term efficiencies. The result will be local authorities which are further away from the people they should serve. Centralising functions and decision-making processes in this way risks alienating local communities and further eroding trust in politics.

We believe that the LGR options offered should have taken more account of the considerations we have outlined here. However, we acknowledge that decisions have already been made. So, in the rest of our response, we address the specific questions we have been asked in the consultation exercise and how to make LGR work in Cheltenham.

The options advanced in the consultation

1. A single unitary council comprising the entire current areas of Gloucestershire

We consider this will score poorly in terms of democratic fit and (without a major investment) could lead to a poorer service to citizens. Also, there is a danger that planning, conservation, design quality and public realm issues will struggle for attention and resources alongside major statutory pressures, notably adult and children's social care and education. However, this option has the merit of retaining the historic shire county, and it could be made to work if serious arrangements were made to devolve powers, resources and responsibilities to local areas akin to the current district councils (see comments below concerning Cheltenham).

2. Two unitary councils for east and west Gloucestershire

This would split the county into a relatively wealthy east and a less wealthy west. Also, neither area would be large enough in population terms to function effectively as a top tier local authority: the population of each of the two areas would be roughly half the target figure of 500,000. This option also divides the historic shire county.

3. Two unitary authorities for a greater Gloucester city and the rest of the county

We can't see any logic in this. A solution of Gloucester city and the rest makes no sense in planning terms and treats the bulk of the county as an afterthought. It's a non-starter.

Doing the best for Cheltenham within a single Gloucestershire unitary authority

The proposals below concentrate on planning, conservation and heritage issues – our area of concern – but the same kind of arrangements could be made for other functions of the local authority. Also, while our recommendations relate to our own town, they would seem just as relevant elsewhere in the county after LGR.

Assuming Option 1 is selected, we believe the aim should be *to keep planning close to place and people*. In particular, the following principles – expanded on below – should shape the arrangements that are made for the future governance and delivery of planning and related services in Cheltenham after reorganisation:

- incorporate as much local democratic representation and accountability as possible,
- ensure that the delivery of unitary authority planning services for the town is brought as near to people as possible,
- guarantee that Cheltenham has access to professional knowledge and expertise it needs,
- ensure that Cheltenham town centre has the special attention it requires,
- incorporate in unitary authority decision-making ways of working with informed local interests,
- represent continuity where needed, and
- promote best practice.

Local democratic representation and accountability:

Cheltenham is a town of 120,000 with a proud history and national recognition. At a minimum it should have its own elected Cheltenham Town Council, established with boundaries that approximate to those of the current Borough. This town council should:

- have delegated to it the maximum planning role available under legislation, for example in preparing local guidance on design,
- be invited to work jointly with the county on such matters as the preparation of local plans, and
- be accorded the maximum extent of consultation with the planning authority, for example in assessing planning applications.

The town council should exercise the power to precept to cover the costs of its work.

Delivery of unitary authority planning services

The unitary authority will need to create a planning board for Cheltenham, made up of its elected representatives from the town, with coopted experts where necessary, and serviced by a local team of planners with heritage and conservation experience (see below). It will need to agree a way of working closely with the town council so as to draw on their expertise and complement their efforts. This will be where the great majority of plan-making, development control and enforcement decisions are taken, other than those delegated to officers or to the town council. The board should meet in Cheltenham so that its deliberations are seen to be undertaken in public where the impact of its decisions will be felt.

Access to the authority's professional knowledge and expertise

There should be an adequately-sized team of professional planners for Cheltenham, with the necessary range of heritage and conservation skills and expertise, assigned to work on the needs of our town. This team, which should have genuine place-based knowledge, should be headed up by an officer who is identifiable as 'Mr/Ms Cheltenham planning'. This person and their team should be located in Cheltenham, be readily accessible and have a visible presence in the town.

A special focus on the town centre

Cheltenham's economy is heavily dependent on its unusually vibrant and beautiful town centre, which also makes a wider contribution, not least through its unique heritage value, in supporting the visitor and other economic base of the county as whole. This should be recognised, protected and developed. To this end a town centre forum should be established. This will coordinate management of the public realm and promote civic pride. Members should include, as a minimum, town council representatives, the local amenity group, the Business Improvement District and neighbourhood police.

Working with informed local interests

There should be clear mechanisms for civic and community input, with our civic society and other local groups accorded formal consultee status on planning, public realm and conservation matters. It will be important to work out an efficient way to inject this knowledge into the decision-making process.

Ensuring continuity

In future, planning applications on the planning portal should be filtered by locality, so that it is as easy as now to find those that relate to Cheltenham specifically. Also, online access to historic planning applications and decisions should be maintained so that new applications can be seen in the context of what has gone before.

Promoting best practice

A critically important role of the unitary authority will be to promote best planning practice throughout the county, drawing on – and exchanging knowledge between – those in different parts of Gloucestershire. Cheltenham will have a lot to contribute to this shared knowledge and will also benefit from access to it. This is an area where local government reorganisation could bring real added value.

Conclusion and our offer

We are not persuaded that any of the LGR options will improve matters in our county and are concerned that local democracy will suffer without compensatory benefits. However, if Option 1 is selected, we think there are ways in which planning, along with heritage and conservation, could be delivered in line with the principles set out above.

Should this be done, we offer to assist the new unitary authority with our knowledge of Cheltenham, and specifically by: providing informed local insight to improve the quality, efficiency and robustness of planning, conservation and design decisions; acting as a constructive sounding board for new structures, processes and engagement mechanisms; helping to explain and advocate well-designed reforms within our communities, thereby strengthening public understanding, confidence and trust; and supporting a culture of early engagement, problem-solving and shared stewardship of place.

Used well, the civic movement is not an obstacle to reform but an asset that can help.

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