

UPDATE ON STRATEGIC PLANNING IN GLOUCESTERSHIRE

Meeting	GLOUCESTERSHIRE ECONOMIC GROWTH SCRUTINY COMMITTEE (GEGSC)
Report Author	Mike Dawson
Background documents	National Planning Policy Framework 2021
Location/Contact for inspection of background documents	N/A
Main Consultees	N/A
Planned Dates	N/A
Purpose of report	Status of Strategic Planning in Gloucestershire This report provides an update on the status of strategic plans that have been progressed by the Gloucestershire authorities and the levels of growth that have been identified and is being planned within them.
Recommendations	To NOTE the update on the progress on strategic plan making by the Gloucestershire authorities, the amount of growth being planned for, and key delivery projects.
Reason for recommendations	To ensure that the committee is aware of the status of strategic planning across the county.
Resource implications	N/A

1. Introduction

1.1. Strategic Plans provide the strategic planning policies for the plan area. They set out the housing and employment growth requirements for their respective areas as well as identifying major development projects that will help to deliver them. The local planning authorities in Gloucestershire have all adopted strategic plans and these include Cotswold, Stroud and Forest of Dean as well as Cheltenham, Gloucester City and Tewkesbury Borough who together have the Joint Core Strategy (JCS). Reviews of these documents are currently underway alongside the progression and adoption of second tier plans and supplementary planning documents. This paper provides an update on these plans and some of the key projects, as well as an update on national guidance.

2. Stroud District Local Plan

2.1. The Stroud District Local Plan was adopted in November 2015 and covers the period from 2006 to 2031. The plan identifies the following growth requirements:

- Housing: 11,400
- Employment land: 58ha
- Jobs: up to 12,500

2.2. To deliver the growth required in the adopted plan, the local plan identifies several strategic sites that will meet some of this housing requirement totalling 3,300 homes and a significant proportion of its employment land requirement totalling 52ha.

2.3. The Council has been progressing a review of the Local Plan since 2017. The reviewed plan will cover the period from 2020-2040. Public consultation on the Pre-Submission Plan took

place in May 2021, and the Plan was submitted to the Secretary of State in October 2021. The growth strategy envisages delivering 12,600 new homes at a series of strategic locations including two new settlements. There are 79 hectares of new employment land proposed at a series of strategic locations. Examination and adoption of the new plan is anticipated in 2022.

3. Joint Core Strategy

3.1. The Gloucester, Cheltenham, and Tewkesbury Joint Core Strategy (JCS) was adopted in December 2017 and covers the period between 2011 and 2031. The plan identifies the following growth requirements:

- Homes: 35,175
- Employment land: 192ha
- Jobs: 39,500

3.2. There are a number of strategic sites for the JCS, and these are set out in the table below along with a summary update of progress on these sites:

Site	Homes	Employment Land (ha)	Update
Innsworth & Twigworth	2,295	9.1	108 dwellings completed during the 2020/21 monitoring year and 108 built out in total. 466 further dwellings which have planning permission which have not yet been constructed.
South Churchdown	1,100	17.4	18 dwellings completed during the 2020/21 monitoring year and 18 built out in total. 437 further dwellings have planning permission which have not yet been constructed.
North Brockworth (Perrybrook)	1,500	3	158 dwellings completed during the 2020/21 monitoring year and 179 built out in total. 350 further dwellings have planning permission which have not yet been constructed. Some pre-applications have come in for the final phases.
Northwest Cheltenham	4,285	23.4	Persimmon scheme for 260 units submitted to Cheltenham Borough Council. Revised Plans submitted April and further revised plans awaited. Larger scheme at final stages of preparation. Delay linked to transport modelling. Working through s106 negotiations with planning authorities.

West Cheltenham	1,100	45	Golden Valley SPD adopted July 2020. Preferred development partner announced July 2021.
Ashchurch		14.3	Construction has commenced on site for the garden centre and retail outlet.
Winneycroft	620		Consents across the whole site with the site now providing 637 homes. Start on site expected before end of financial year.

- 3.3.** In addition to these allocations, Wychavon have agreed to provide a site in Mitton for 500 dwellings. Ongoing negotiations have been progressing and it is expected that the planning application will go to committee before the end of the year.
- 3.4.** Delivery in the JCS area has been strong and as of 31st March 2021 total completions over the JCS plan period to date have totalled 14,342 dwellings: Cheltenham have delivered 3558 delivered of their 4050 target; Gloucester City have delivered 5205 of 7180; and Tewkesbury have delivered 5579 out of a 4455 target (2019/2020). The adoption of the emerging Tewkesbury Borough Plan and Gloucester City Plan will add further to the housing supply of the area.
- 3.5.** In terms of employment, the JCS allocates 112.2 ha of employment land on strategic sites. The Tewkesbury Borough Plan proposes to allocate a further 26.9 ha across new sites and carry over 43.1 ha of undeveloped capacity on sites allocated within the Local Plan to 2011. This equates to a total of 70ha of employment land allocated within Tewkesbury Borough Local Plan. In addition, a further 6 ha is allocated within the adopted Cheltenham Plan; 15.3 ha is proposed in the submitted Gloucester Local Plan alongside an additional 16.1 ha from extant consents on allocations in the previous Gloucester plan, this adds an additional 37.4 ha.
- 3.6.** Considering the 70 ha proposed within Tewkesbury and 37.4 in Cheltenham and Gloucester, 107.4 ha of employment land will be provided outside of strategic allocations. Therefore, together with the 112.2 ha allocated on strategic sites, the JCS authorities have a total of 219.6ha being provided over the plan period therefore meeting and exceeding the JCS requirement of 192ha of employment land.
- 3.7.** Upon adoption of the JCS, the JCS was committed to an immediate review on housing supply for Tewkesbury Borough and Gloucester as well as a retail/town centre review for the whole area. With regards to new homes, the JCS identifies a housing shortfall of around 2,400 homes for Tewkesbury Borough and around 1,000 homes for Gloucester at the time of adoption. In regard to retail, an immediate review is required to update an assessment of retail needs and to explore the allocation of strategic retail sites in accordance with a retail/town centre strategy. However, due to new requirements set out in the revised National Planning Policy Framework and to address wider delivery issues with the existing JCS, it is considered that this review will need to be extended to be a comprehensive review of the plan.
- 3.8.** To start this process the JCS Review Issues & Options consultation took place from November 2018 to January 2019. This consultation asked questions around all aspects of

the review, including the extent of its scope and plan period to be addressed. The authorities are now in the process of gathering the evidence required to inform the development of a draft JCS that will be subject to public consultation. The timetable for this process is currently under review.

3.9. Outside of the strategic allocations, each of the JCS authorities also has an identified district capacity which is to be met by smaller-scale allocations made through district-level plans that sit underneath the JCS. These plans are now at an advanced stage, with the Cheltenham Plan already adopted in August 2020, while the Tewkesbury Borough Plan was submitted for examination in May 2020 with hearings taking place in February/March this year, and adoption expected early 2022. Gloucester City also submitted their Plan in Winter 2020, their hearings took place in May/June 2021 and adoption is also expected early 2022.

3.10. In terms of a five-year housing land supply and the housing delivery test: Tewkesbury has 7.15 years supply as at April 2020 including sites allocated in Tewkesbury Borough Plan, and a 163% housing delivery test score; Cheltenham have a 3.9 years supply but a 191% housing delivery test score; and Gloucester have 5.0 years supply as confirmed by the City Plan Inspector and a housing delivery score of 146%.

4. Forest of Dean

4.1. The Forest of Dean Core Strategy was adopted in 2012 and covers the period from 2006 to 2026. An Allocations plan which incorporates a full review of housing requirements and makes allocations accordingly was adopted in 2018. An Area Action Plan for Cinderford Northern Quarter was adopted in 2012. The following growth requirements are identified:

- Housing: 6,600
- Employment land: 68ha

The plan period runs from 2006 to 2026 and about 4246 dwellings (net) of the 20-year requirement of 6600 had been completed up to March 31 2021. The Council has a 3.9 years housing land supply, and a 94% delivery rate.

4.2. The Council have commenced work on a revised Local Plan seeking to cover the period 2021-2041 and the current housing requirement by the standard method is 371pa or a total of 7420 over the period. The Plan has been through an Issues and Options consultation and a Preferred Options consultation. The Preferred Options are now being reviewed by Members and a Draft Plan is expected late Summer/Autumn 2022.

5. Cotswolds' District Plan

5.1. The Cotswold District Local Plan 2011-2031 was adopted in August 2018. The plan includes both a core strategy and site allocations. The Local Plan growth requirements are:

- Housing: 8,400 (an average of 420 homes a year)
- Employment land: 24ha of which 12.69ha has been delivered (March 2020)

5.2. The Local Plan allocates land within 17 Principal Settlements. Most allocations are on smaller scale sites. However, there is one strategic scale allocation at land south of Chesterton in Cirencester which was granted planning permission in April 2019 and makes a

significant contribution towards the District’s needs, allocating 9.1 ha of employment land and providing for 2,350 homes.

5.3. Cotswold District has a supply of 7.2 years of deliverable housing sites for the five-year period 1 April 2021 to 31 March 2026. The District also passes the Housing Delivery Test with a score of 163%.

5.4. The District has had 5582 (March 2021) dwellings completed between April 2011 and March 2021.

5.5. The Local Plan review is underway with a Regulation 18 consultation expected in January 2022.

6. Gloucestershire County Council

6.1. The table below provides an update on the County Council’s Strategic Documents and their review

Area	Name of Plan	Date Adopted / approved	Review Underway	Expected completion date
Minerals Local Plan for Gloucestershire	Development Plan Document	Mar 2020	Statutory review required	Mar 2025
Gloucestershire Waste Core Strategy	Development Plan Document	Nov 2012	Review completed late 2020.	<u>New Waste Local Plan for Gloucestershire:</u>
Gloucestershire Waste Local Plan	Development Plan Document – <i>only specific ‘saved’ policies remain part of the statutory development plan</i>	Oct 2004		Adoption by late 2024.
Gloucestershire Waste Minimisation in Development Projects Supplementary Planning Document (SPD)	Local Development Document	Sept 2006	Review completed late 2020.	Adoption by late 2024.
Development Contributions	Gloucestershire’s Local	March 21	No	-

	Development Guide 2021			
Transport	Gloucestershire Local Transport Plan (2020-2041)	March 21	No	-
Transport	Central Severn vale Local Cycling and Walking Investment Plan (LCWIP)	2018	No – but separate plan for Tewkesbury is being produced	-
Transport	Bus Service Improvement Plan	October 21	No	-
Flood Risk Management	Local Flood Risk Management Strategy	Summer 2014	Yes	2022/23 – 2023/24
Flood Risk Management	Strategic Flood Risk Assessment (Level 1)	September 2008	Yes	2022/23 – 2023/24
Education	Gloucestershire School Places Strategy (2021-2026)	March 21	No	-
Education	SEND Commissioning Strategy	January 2020	No	-
Library Services	Strategy for Library Services	2012	Yes	2022
Health	Joint Health and Wellbeing Strategy (2019-2030)	September 2019	No	

7. Key Delivery Projects

7.1. An update on the key strategic planning projects in Gloucestershire is set out below.

7.2. M5 Junction 10

The M5 junction 10 Improvements Scheme is a proposal to provide a strategic transport intervention to unlock housing identified within safeguarded and strategic housing allocations to the West and Northwest of Cheltenham. The scheme comprises of the upgrade of the existing M5 junction 10 near Cheltenham to an all movements junction

and also includes capacity enhancements to the A4019 east of Junction 10, a new West Cheltenham Link Road connecting the A4019 to the strategic housing allocation at West Cheltenham and remote, but associated, upgrades to Arle Court Park and Ride to create a new Arle Court Transport Hub and improvement works to the Coombe Hill junction on the A38 west of M5 junction 10.

The scheme has secured funding and subsequently made a Preferred Route Announcement in June this year, work is now progressing on the preliminary design and associated assessments and evidence base to enable a statutory public consultation from December 2021 to February 2022. Thereafter the scheme will require planning permissions for the works at Arle Court and Coombe Hill together with a Development Consent Order for the junction 10 works (also including the West Cheltenham Link Road and A4019 capacity enhancements). It is currently anticipated that the necessary permissions will be in place to enable construction to commence in 2024 with planned completion during 2025.

More information can be found here:

[M5 Junction 10 Improvements Scheme - Highways \(goucestershire.gov.uk\)](https://www.goucestershire.gov.uk/highways/m5-junction-10-improvements-scheme)

7.3. M5 Junction 9/A46

The M5 junction 9 and A46 (Ashchurch) Transport Scheme is a proposal to upgrade the M5 junction 9 near Tewkesbury and re-route the section of the A46 which currently passes through Ashchurch to the east of the M5 (between M5 junction 9 and Teddington Hands roundabout).

Options are currently being considered for a new dual carriageway between the M5 near Tewkesbury and Teddington Hands roundabout and associated works to M5 junction 9, thereby removing significant volumes of traffic from the A46 through Ashchurch and enabling this existing section to better cater for local traffic movements between Tewkesbury and Ashchurch.

Gloucestershire County Council has applied to the Department for Transport's Large Local Majors Fund (LLM) funding and received approval of the first stage of the scheme development in March 2020, with an approved Pre-Strategic Outline Business Case. Work continues on the scheme and it is expected that a public consultation event will be held in 2022.

More information can be found here:

<https://www.goucestershire.gov.uk/highways/major-projects-list/m5-junction-9-and-a46-ashchurch-transport-scheme/>

7.4. A417 Missing Link

The A417/A419 provides an important route between Gloucester, Cheltenham and Swindon that helps connect the West Midlands and the north to the south of England via the M5 and M4 motorways. While most of the A417 route is dual carriageway, there is one section that isn't. Known as the Missing Link, this three-mile stretch of single carriageway between the Brockworth bypass and Cowley roundabout severely restricts the flow of traffic.

National Highways (formerly Highways England) plan to build 3.4 miles (5.5km) of new dual carriageway, which will considerably improve road safety, reduce traffic congestion and improve connectivity for road users and local communities, while unlocking economic growth in Gloucestershire and beyond. National Highways has submitted the planning application for the scheme to the Planning Inspectorate, and the Examination in Public is likely to commence in November. If the planning application is approved work could start on the construction of the scheme early in 2023.

More information can be found here: <https://highwaysengland.co.uk/our-work/south-west/a417-missing-link/>

7.5. Northwest Cheltenham Strategic Allocation

A planning application for Northwest Cheltenham has been submitted jointly to Tewkesbury and Cheltenham Borough Councils. The councils are working closely with the developers and infrastructure providers to progress the application to ensure the timely delivery of development. Transport infrastructure is a key component of these discussions and how the traffic impact of the site is managed and the development of this site, as with Northwest Cheltenham, is linked to future improvement of M5 J10.

7.6. Golden Valley Development

Known as the Golden Valley Development, the West Cheltenham strategic allocation site was identified in the JCS to deliver 1,100 homes and 45ha of employment land. Cheltenham Borough and Tewkesbury Borough Councils adopted the Golden Valley Development Supplementary Planning Document in July 2020 to help to promote and steer the future development of the strategic allocation.

The GFirst LEP, Cheltenham Borough Council, Gloucestershire County Council and Cheltenham Development Taskforce have been working on the development of a 'cyber hub' as part of the West Cheltenham strategic allocation. Through this work a successful bid was made for £22m funding to help deliver the development of the cyber hub, and a preferred development partner was announced in July 2021.

Transport infrastructure is again a key component of these discussions and how the traffic impact of the site is managed. The development of this site, as with North West Cheltenham, is linked to future improvement of M5 J10.

7.7. Tewkesbury Garden Town

Tewkesbury Borough Council was awarded Garden Town status in 2019 based upon a potential development of 10,195 homes and approximately 100 hectares of employment land. The Garden Town will be supported by infrastructure including roads, schools, and green space to meet the community needs through excellent 'place making'.

Work continues on the evolution of the Concept Plan which was noted by Tewkesbury Borough Executive Committee in October. This document has no planning status currently, but the Garden Town is intended to be formally consulted on through the JCS Review process.

As part of the master planning process, nine founding development principles have been created, drawing on inspiration from the long-established Garden City Movement and UK Garden Communities Model of Development, the adopted Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury (JCS) and stakeholder engagement events held throughout 2019. These principles will act as an important blueprint for all decision making as the Tewkesbury Garden Town evolves.

MHCLG (now DLUHC) has awarded the Borough Council funding through its New Development Corporation Competition - to progress the exploration of an appropriate delivery vehicle to oversee the completion of this major development. This workstream is in progress and the Tewkesbury Garden Town team are currently procuring this work.

To support planned development appropriately, early infrastructure delivery is underway, including a new bridge over the railway line at Northway based upon the award of £8.1 million from the Housing Infrastructure Fund (HIF). The planning application has been approved and the next phase underway includes detailed design and the selection of a construction partner, in due course.

7.8. Strategic Site south of Chesterton, Cirencester

Land to the south of Chesterton, Cirencester was granted outline planning permission in April 2019 for, amongst other things, up to 2,350 dwellings (including up to 100 units of student accommodation and 60 homes for the elderly), along with 9.1 hectares of employment land (B1, B2 and B8 uses). It is currently anticipated that around 1,550 dwellings will be completed during the plan period with the remainder coming forward after 2031. Reserved matters was granted for this application in October 2021.

7.9. Cinderford Northern Quarter

This is a mixed use regeneration scheme and includes housing and employment allocations. A new FE college has been completed served by a new road which will enable further mixed development. Previously, as part of the Cinderford Regeneration Project, Forest of Dean District Council, Two Rivers Housing and Kier Partnership Homes Limited worked together on the redevelopment of the Valley Road site. The scheme was for a total of 92 houses, of which 55 were open market homes and 37 were affordable homes. The project had a total cost of approximately £20m with not-for-profit Two Rivers investing £3m into the project, for the provision of the 37 affordable units.

7.10. Lydney Harbour Regeneration

A comprehensive scheme to safeguard and protect the docks and harbour and realise their full potential whilst supporting a major private sector investment for which a planning application is due shortly. It is centred on a former factory and will provide jobs and a recreational/ tourism opportunity.

7.11. West of Stonehouse Strategic Allocation

Outline planning permission for 1,350 dwellings, local centre and 10 hectares of employment land was granted in April 2016. Reserved matters were approved in May 2017 for infrastructure to serve Phase 1. Developers were on site in September 2017. Redrow and Barratt Homes/David Wilson Homes are delivering the first housing phases.

Parcel H21 is under construction with 82 completed as at April 2021. Parcels H16 and H19 reserved matters have been approved. The delivery of employment parcels is linked to progress with initial housing phases to ensure balanced growth of homes and jobs. The implementation of phases is being managed via area masterplans.

7.12. Hunts Grove Extension/Quedgeley East Strategic Allocations

A renegotiated outline permission for Hunts Grove was granted in July 2016 for 1,750 dwellings, a school and local centre. 339 dwellings have been completed just in the monitoring year 2020/21 on a variety of land parcels. Crest Nicholson will oversee delivery as the main developer with partner developers building out sub areas within the masterplan. An outline permission for 25 hectares of employment land at Quedgeley East was granted in November 2018 subject to delivering M5 J12 improvements and is now under construction. Highway capacity issues remain at M5 J12 in the adopted and emerging Local Plans and the accompanying evidence base.

8. Gloucestershire Statement of Common Ground

- 8.1.** Since the previous report, work on the Gloucestershire Statement of Common Ground has been on-going including consultation with Leaders of all Councils with the aim of securing sign off on the agreement. Whilst work has progressed well with many areas agreed, there are some areas where agreement from all Councils has not been possible. Work is now underway to set these areas out and these will be included within an appendix to the Statement of Common Ground, as areas not agreed upon.

9. National Planning Matters Update

- 9.1.** In September, the Ministry of Housing, Communities and Local Government was changed to the Department for Levelling Up, Housing and Communities, with the Government's central aim of levelling up every part of the Country and building back better after the pandemic.
- 9.2.** Further developments on the Planning White Paper are yet to materialise. However, it is expected that much of what was set out in that Paper will be 'watered down' or disbanded altogether.
- 9.3.** On July 21st the government launched a new Office for Place with the aim to support councils and communities to develop user friendly, effective design codes. The government "aims to shift an industry culture to a point where mediocrity is no longer proposed or accepted."¹ At the moment the Office for Place will focus on pilot projects. The launch of the Office for Place came alongside changes to the NPPF and the publication of a new National Model Design Code with the intention to make 'beauty' central to the planning system.
- 9.4.** Changes to the NPPF have been made to incorporate the National Model Design Code and some of its themes into the planning system. For example, there is now a requirement for all new streets to be tree lined² (*"unless, in specific cases, there are clear,*

¹ The Rt Hon Robert Jenrick MP <https://www.gov.uk/government/speeches/office-for-place-launch>

² Para 131, NPPF, July 2021

justifiable and compelling reasons why this would be inappropriate”), and the social objective of the planning system has been expanded to include the word “beautiful”³.

- 9.5. The NPPF sets out that to carry weight in decision-making design codes should be prepared either as part of plan making or as supplementary planning document. Landowners and developers can contribute and may choose to prepare a code to support their application. Regardless of whoever prepares them, they need to be based on effective community engagement and reflect local aspirations. Where there is no local code the National Design Guide and the National Model Design Code will be used.⁴
- 9.6. The changes to the NPPF also seek to improve design quality by allowing LPAs to refuse development that is not well designed, *“especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”⁵*
- 9.7. Conversely developments that reflect local design policies, guides and codes, and the government guidance on design are to be given significant weight.⁶
- 9.8. A new paragraph 128 states that in order to *“provide maximum clarity about design expectations at an early stage”*, all local planning authorities *“should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences”*.
- 9.9. Other changes to improve design include requiring LPAs to seek to ensure that quality is not diminished between planning permission and completion⁷. This relates to materials, or the more interesting elements of the architectural appearance, that can sometimes be diluted post permission through amendments or the discharging of conditions.
- 9.10. In terms of strategic sites, policies for large scale developments such as new settlements or significant extensions to existing villages and towns now need to be set within a 30-year vision. This only applies to plans that have not reached Regulation 19 (pre-submission) stage on 20th July 2021.
- 9.11. The previous NPPF’s presumption in favour of sustainable development has been expanded to provide more emphasis on upfront delivery of infrastructure and has placed more importance on adapting to and mitigating the effects of climate change: *“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*.
- 9.12. Another change seeks to bring clarity to how councils use Article 4 directions to remove national permitted development rights. The intention is to stop councils using an Article 4 to prevent the conversion of non-residential uses into residential uses in a blanket fashion. Article 4s can still be used for this purpose if they are preventing *“wholly*

³ Para 8b, NPPF, July 2021

⁴ Para 129, NPPF, July 2021

⁵ Para 134, NPPF, July 2021

⁶ Para 134, NPPF, July 2021

⁷ Para 135, NPPF, July 2021

*unacceptable adverse impacts” and are “based on robust evidence and apply to the smallest geographical area possible.”*⁸ The NPPF sets out that this could apply to a primary shopping area but would be very unlikely to apply to a whole town centre.

- 9.13.** With regard to historic statues the NPPF provides that Councils should 'retain and explain' statues rather than remove them. New paragraph 198 states: “In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.”
- 9.14.** There is more emphasis ensuring infrastructure needs are aligned with growth. A new paragraph states: "To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted."⁹
- 9.15.** The reference to Building for Life has been removed and replaced with an updated design toolkit called Building for a Healthy Life¹⁰ which is endorsed by Homes England, the Home Builders Federations, and the Urban Design Group.
- 9.16.** There is a new emphasis on protecting not only the AONB but also its setting, stating that ‘development within their setting should be sensitively located and designed to avoid or minimize adverse impacts on the designated areas’. Further, there is a presumption against major development in such areas.
- 9.17.** Obviously, all these changes will need to be taken account of in the review of Local Plans, and any further changes as a result of the planning reforms will also need to be considered. However, planning reforms are currently on hold as the new department of Levelling Up, Housing and Communities is focusing its agenda on ‘levelling up’. So, it remains to be seen as to when any changes will be put forward and how this will affect the development of Gloucestershire’s local plans.

⁸ Para 53, NPPF, July 2021

⁹ Para 96, NPPF, July 2021

¹⁰ Building for a Healthy Life

https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf