

Sent via email to:

planningforthefuture@communities.gov.uk

ask for: Diane Savory

email: diane.savory@gfirstlep.com

our ref: DS

your ref:

date: 26th October 2020

Dear Sir/Madam

To support Cheltenham in its Covid-19 economic recovery a Recovery Taskforce has been established. Hosted by Cheltenham Borough Council, the Task Force is a vehicle with which conversations and actions focussed on economic recovery can be driven forward. A core group has been established around the skill sets of property, retail, commercial, culture, political and place making.

Leadership at this time is fundamental both in understanding and responding to the challenges ahead, but also in expanding our thinking and exploring opportunities for creativity and innovation. One of our first activities has been to review the Planning White Paper and the reforms now being consulted upon.

The Cheltenham Economic Recovery Taskforce see planning as being a critical tool to support growth and inward investment into Cheltenham, however such tools need flexibility and the ability to facilitate innovation and growth at pace. Attached to this letter are the reflections of the Taskforce on the reforms as presented.

We would be very welcome to share experiences of Cheltenham and expand further on any points outlined in our response. Please do not hesitate to contact tracey.crews@cheltenham.gov.uk.

Yours sincerely



Diane Savory OBE DL
Chair
Cheltenham Economic Recovery Task Force

Planning for the Future – Cheltenham Economic Recovery Taskforce response to the Planning White Paper.

Cheltenham Borough has established a Cheltenham Economic Recovery Task Force as part of its response to the Covid-19 pandemic. This Task Force is made up of leaders and specialists within our locality all committed to driving positive social economic change.

We are in unprecedented times and in such times we need to capitalise on every possible tool to drive recovery and growth in our economy. We welcome planning reform, planning offers a lever with which to create flexibilities to facilitate growth and the right opportunities to foster inward investment and homes for local people.

Overall we support the ethos of looking at ways to improve the UK planning system, however whilst we criticise it, we must also remember that it is the envy of other parts of the world. We accept that change is needed, however, we should not simply cut and paste a zonal system and apply to a UK context. Due regard is needed that recognises and celebrates the positive parts of our current system and the value that brings within our localities. Below are points we would like to be considered as part of the consultation process.

Housing led: The reforms as drafted are all about housing. We accept that housing delivery is a significant part of recovery; however as drafted the reforms are one dimensional and blinkered. There needs to be a rebalancing across the reforms as presented which places equal attention to creating the right conditions for economic growth and regeneration, sustainable development and the future of our High Streets.

Delivery of housing is inextricably linked to the delivery of social and physical infrastructure in the creation of successful communities; the missing in the proposed reforms is the teeth around how both homes and infrastructure is delivered at a higher standard to deliver, zero carbon, modal shift and improved building standards and safety.

Outside the proposal for zoning, how will the planning system deliver a step change to the delivery of housing? This is not clear in the proposals.

Planning for housing by an algorithm is not sound. Housing needs to be delivered in the right place at the right time, linked to the growth outcomes of localities. This link is not present in the planning reforms as drafted.

Future of town centres: Before Covid, there was clear academic and industry evidence that demonstrated that town and city centres needed to adapt and evolve, with physical places creating a better mix of uses in order to create a destination and for retailers to create places for experience. This has been amplified by Covid as consumers have adapted to online shopping. This reinforces the evidence of need to create centres of quality and experiences, but also to act as an opportunity to repurpose and reskill which is as important to the high Street as it is to other areas of urban centres.

The zonal approach sets out simple categories, however, managing change is more sophisticated than this, which requires locality knowledge and vision for change to a mixture of renewal and protection. Local authorities, supported by vehicles such as the Cheltenham Economic Recovery Task Force, are best placed to curate town centres. Our view is that a zonal approach provides too

much flexibility. For developers value will always drive development, but unfortunately this does not always drive quality or sense of place.

The planning reforms as drafted, seeks to put a rigid framework around planning. We know that planning has many complexities, but this will never be able to be sophisticated enough to manage the conversation there needs to be across the town and city centres of the UK that builds the understanding around the value of the town and city centre.

How do you get the engagement with the developer? How is the occupant or business able to drive best value? There is now a completely different texture given the drop in the value in the market.

As drafted, the White Paper proposes more centralised control. In part there is a place for this, but where place outcomes are concerned localities hold the knowledge, relationship with their communities and should be masters of our own destiny. Covid-19 has shown the importance of local decision making that affects local areas. Examples from Cheltenham that have been applied locally to aid our town, include - relaxing construction hours, relaxing controls on the 'use rights' of existing business to enable flexibility to sustain their businesses, allowing temporary structures. These are examples of local decision making taken despite national planning legislation to the contrary which have clearly supported businesses and with which we are currently making decisions to extend given the positive feedback from businesses.

Environmental: Environmental elements of White Paper are weak. Planning reforms could provide clear leadership on the carbon neutral agenda. There are only 6 references to the carbon agenda throughout the White Paper and it's not clear how this fits into other government strategies and legislation. We feel there is a lack of joined up thinking and future proofing the planning outcomes.

Sustainable green growth is fundamental if we are to stimulate the economy, whilst at the same time contributing to wider environmental and climate change outcomes. This needs to be properly presented within the planning reforms.

Heritage: The recognition of heritage as part of our cultural capital is welcomed; however this also conflicts with the flexibilities for stimulating growth. The centre of Cheltenham is characterised by our Regency heritage which we have a role in protecting and curating. However, we sometimes need to give buildings another life. It's not about harm; it's an opportunity to recreate. The challenge is in protecting everything is that we potentially undermine the greater good which could lead to fantastic development and our heritage of the future. We need to build in flexibilities into the planning reforms that shift away from protection, to looking in a holistic way in the context of good design and place making.

Green Belt: When devised, the Green Belt was fully intended to be reviewed. Green Belt is an artificial protection; it stifles the opportunity in Gloucestershire for sustainable growth.

Design quality: Design quality is an important element of successful development outcomes both for individual buildings, but in building connected communities with a high quality of life. What is beautiful? There is very little in the White Paper that defines a potential emergence of an assessment criteria. Design guides and strategies take a long time to develop and do not allow flexibility, and building safely into design or the broader environmental debate. Experience demonstrates that design guides can lead to pastiche developments.

A sense of place and creating and defining a sense of place is vital. Key pillars could lead to needs living environments. Conservation defines place, but needs to enable creating an edge – innovate, create – looking back at Cheltenham’s heritage

Building resilient, mixed and balanced communities is very important. Housing needs to be linked into town centres, wider economic centres and social infrastructure – these factors are not factored into design nor highlighted as important within the White Paper.

Many of our residents appreciate the great examples of exemplar design across Cheltenham and further afield both UK and internationally, but also know and acknowledge what bad looks and feels like. In times of competing demands on time, a playbook of 'exemplar' examples both UK and abroad to facilitate community engagement across all socio demographic sectors would be very useful. In simple terms 'a picture paints a thousand words!' in laying out the vision.

Creating flexibilities for economic growth and innovation: The planning reforms read to strategic development and the planning for this. However, in urban centres such as Cheltenham where there is a higher number of SME’s and an appetite for start-ups, we cannot see how the planning reforms foster this growth. Where do small incubator uses go? We have evidence locally of innovative businesses, looking for small, low rent space. There exists significant demand for small 2,000k-3,000 Sqft properties. The demand is there, but opportunities don’t exist – opportunities to do something differently – White Paper doesn’t talk about grant regimes, flexibilities that could be created to support private landowners to innovate – community-investment partnerships, future flexibilities around future use of CIL. It would be helpful for the planning reforms to look at past good practice, such as relaxations that came with former renewal areas, e.g enterprise zones and best practice from elsewhere in the world that is focussed on stimulating innovation and social economic growth.

Communities: Linked to our comments on design and engagement, planning across the demographic and socio-economic backdrop is important and how this feeds into functional and beautiful places that help create and support communities. Cheltenham is not unique, in that it needs to deliver across variations in society, such as physical and unseen disabilities, access to and affordability of transport, all of which can be proactively addressed by requiring exemplar developments supported by the necessary infrastructure. This should not be limited to housing sites, but across the spectrum including retail and business/employment sites, which may be less glamorous areas, but can support a greater and more diverse mix of uses. Pushing for a greater understanding of delivery of the 15 minute neighbourhood and what this means for development will lead to more inclusive and resilient communities. Planning should be flexible to support delivery.

Measuring success: There is no reference in the White Paper as to how we will measure success of planning reform or indeed what the new system would provide that is different to the outcomes we currently achieve. Tools are needed to deliver against the planning proposals including;

- The importance of local design panels
- Commitment to engagement, in particular digital engagement so that localities can engage more effectively by demographics and socio-economic background. Of particular relevance is the youth agenda who should have an active voice in planning for their future. Funding is required to invest in the right platforms to achieve this

- There is a difference between public information and public engagement – firmer parameters are required that require developers to engage more actively with local communities
- The need to resource planning departments appropriately to have in place specialists to drive the place making agenda and understand the commercial complexities of development
- An effective planning committee, we suggest a change in regulations to speed up decision making, so that planning committees focus on major schemes. A requirement through regulations for all planning committee members to attend formal training
- Investment in training for planning teams and planning committee members to all fully understand the complexities of schemes presented.

Transition: The changes as presented are likely to take at least 5 years to deliver, local authorities are stretched beyond their resources and focus is required elsewhere as councils respond to both managing the Covid-19 pandemic and putting in place plans for recovery. Whilst we accept that the system isn't perfect, it isn't broken. If reforms are to occur, we suggest it would be wise to wait until the economic climate looks more settled.