



To: Sent via e-mail.

Economy, Environment, and Infrastructure
Shire Hall, Westgate Street, Gloucester, GL1 2TG

Our Ref: 2025/04/CBC-LWHDNP/AD

Your Ref:

Date: 19 May 2025

Dear Sir/Madam,

**Leckhampton with Warden Hill Draft Neighbourhood Plan - Additional Reg.
16 Public Consultation**

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the materials for the Additional Regulation 16 consultation on the draft Leckhampton with Warden Hill Neighbourhood Plan – Regulation 15 Submission (dated June 2023).

Officers highlight potentials in:

- Achieving housing standards of M4(2) and M4(3)
- Considering value of designated and non-designated heritage assets in ecology, education and greenspaces provision

Comments offer numerous documents for guidance and evidence; and suggest matters on which relevant GCC service areas can provide further advice.

Representations in this response are in addition to previously submitted comments during the earlier stages of public consultations held in January and March 2024.

Detailed officer-level comments are as below.

Yours faithfully,

Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Adult Social Care

The draft Neighbourhood Plan highlights several key demographic challenges in the Leckhampton and Warden Hill areas. The section on vulnerability (para 46, p. 11), highlights the higher-than-average number of disability benefit claimants living in Warden Hill along with a higher number than the national average of attendance allowance claimants in the area. In addition, the section on housing (para 73, p. 15), refers to an ageing population in both areas, in part created by high housing costs. With these key demographic challenges in mind, we feel that the draft Neighbourhood Plan should contain specific and measurable targets for accessible and adaptable standard within the “**Key Challenges, Vision and Objectives**” section of the local plan.

The draft Neighbourhood Plan refers to a need for 40% affordable housing in both areas within the plan. We propose that *all new* housing is built to Part M4 (2) standard. The UK Government gave a commitment to make M4 (2) a minimum standard in 2022. They made this decision following lengthy consultations.

- Government of UK’s Press Release on Supply of accessible homes to receive vital boost is available from:
<https://www.gov.uk/government/news/supply-of-accessible-homes-to-receive-vital-boost>

Evidence shows that developing new builds to Part M4 (2) standards does not cost significantly more.

- Housing and disabled people: a toolkit for local authorities in England on planning accessible housing is available from:
<https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-planning-accessible-homes.pdf>

Accessible housing enables people of all abilities to thrive, reduces the burden on stretched adaptations teams, reduces the impact of ill health on the NHS and reduces care costs. Residents are more likely to be in employment if they live in accessible housing that meets their needs.

The Local Housing Needs Assessment for Gloucestershire in 2018 established the need for wheelchair housing at 8% of all new housing. This is likely to now be higher given years of under delivery of wheelchair housing and therefore we propose that 10% of new housing is built to Part M4 (3) standards that are suitable for wheelchair users. The costs to the local authority for extending standard properties for wheelchair users are often 3 times the cost of building from new (see “Housing and Disabled People” toolkit referenced above).

As such, both from an Adult Social Care perspective and Public Health perspective, it is important that the draft Neighbourhood Plan contains these specific measurable standards which commit to developing Part M4 (2) and (3) housing so that success can be measured and realistically delivered.

Archaeology

Archaeology was previously consulted at the earlier Regulation 16 stage and highlighted that the neighbourhood plan should follow the Historic England's "*Advice Note 11: Neighbourhood Planning and the Historic Environment*", and consider the archaeology of the area, especially within the section on Local Heritage and Appendix 4.

- Historic England's Advice Note 11: Neighbourhood Planning and the Historic Environment is available from:

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-historic-environment-advice-note-11/>

Whilst officers recognise that under draft plan's section on "Local Heritage", references are made to Section 16 of the National Planning Policy Framework (NPPF) and Cheltenham Plan Policy HE1, the emphasis largely remains on buildings of local interest. The draft Plan has also not been updated further to consider **non-designated heritage assets** of archaeological interest which could be candidates for the Local List. We hope that this matter is addressed going forward. GCC officers of Archaeology, would be happy to provide further advice.

A gentle reminder, that the NPPF paragraph numbers in the "Local Heritage" section of the draft Neighbourhood Plan require updating.

GCC officers welcome how the principles and supporting text set for Policy LWH4 – Green Infrastructure and Policy LWH5 – Conserving and Enhancing Valued Landscape, broadly address the contribution of heritage assets and the numerous cross-cutting benefits they can offer to the management of designated areas, and in delivering sustainable development and land use. As set out in Natural England's guidance on Nature recovery and the historic environment, "conserving and enhancing the historic environment is an integral part of protecting, managing, and planning for nature and landscapes".

- Natural England's report on Nature Recovery and Historic Environment is available from: <https://unesco.org.uk/resources/nature-recovery-and-the-historic-environment-natural-england>

Cheltenham Borough Council's Local Green Spaces Study Report (2015) sets out how the history of green spaces can make an important contribution to their significance, for example, the ancient monuments, listed buildings and local views at Leckhampton Fields. Often, green spaces, green infrastructure and landscapes contain historic routes, designed landscapes and other heritage assets which are

also wildlife rich sites that, if appropriately managed, can act as important links in a national biodiversity network. Their characteristics will often dictate what species can and cannot thrive and inform decisions about restoration options and appropriate management. This recognition of the contribution of heritage assets appears to broadly underpin policies LWH 3 to 5 (i.e., Local Green Space; Green Infrastructure & Valued Landscape), including educational opportunities, which again we welcome.

Climate Change

GCC officers have no further comments to make.

Ecology

GCC officers have no further comments to make.

Economy

GCC officers have no further comments to make.

Education

GCC officers have no further comments to make.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health

GCC officers have no further comments to make.

Transport Planning

Comments on transportation and active travel were provided as part of the previous consultation response in March 24. The schedule of changes (or proposed amendments) provided with this consultation indicate no substantial changes to the draft Neighbourhood Plan since the last consultation in relation to transport and so no further comments are made.