

Heine Planning Consultancy

Alison T Heine B.Sc, M.sc

Tel: [REDACTED] **e-mail:** [REDACTED]

COMMENTS REG18 CHESHIRE WEST AND CHESTER LOCAL PLAN

Whether the right issues have been identified and which options are the best for addressing them

planningpolicy@cheshirewestandchester.gov.uk

General comment

1.18-Concern that the Reg18 consultation has proceeded ahead of all the Evidence required and the Evidence Base is incomplete. In particular the Council has launched this consultation in advance of an updated Gypsy Traveller Accommodation Assessment to replace the 2018 Study which relied on data gathered in 2017. Having contacted current clients and other agents, I know of no household in CWAC that has been approached by RRR to date and I have contacted RRR to offer to put them in touch with clients.

In addition there has been no Green Belt Area Assessment following guidance in the PPG published February 2025. It is far from clear how the Council can be recommending that land in the Green Belt be released for new development when this is not informed by a district wide Green Belt study .

Section 13 Green Belt and countryside

As the only GB area assessment is for Chester I fail to understand how any proposals can be advanced to amend the Green Belt and identify possible Grey Belt land without a comprehensive assessment of the whole Green Belt and its purpose.

Without such an assessment and review of the role of the Green Belt the Reg18 consultation is premature and will achieve little. This is a sub regional issue. It is intrinsically linked to development issues in neighbouring districts.

Given that STRAT9 deals with the Countryside and Green Belt is there really a need for the Green Belt designation? Somewhat ironically, with the introduction of the Grey Belt it is probably now easier to secure permission for some developments, where need has not been met, within the Green Belt than in other parts of ordinary countryside. By definition (land around main settlements) much of the land in the Green Belt is more accessible to services/ facilities/ settlements and transport networks than countryside elsewhere.

I question where the evidence is to back up the following statement?:

13.4 The countryside of Cheshire West and Chester and the high quality of its landscape and environment is recognised as a key asset and is highly valued by the borough's residents. The quality of the environment attracts a highly skilled workforce, businesses and visitors therefore it is important to continue to protect this asset.

Having lived in Northwich for over 20 years, I do not know of any one who has chosen to live/ remain living in Cheshire West and Chester for these reasons. The fact house prices were (may still be) much lower than Gt Manchester, with a greater choice of housing than in Gt Manchester has to the best of our knowledge been the key reason many have chosen to live here combined with access to the strategic road network. The landscape/ environment is typical of countryside areas across much of England and could hardly be described as high quality. None of it is currently designated as a National Landscape.

It is disappointing that the emerging Local Plan fails to challenge the relevance of the North Cheshire Green Belt given present day land uses? Settlements have grown so much and are now so heavily connected by strategic highways and railways and complex commuting patterns, that the perceived necessity to retain separation is a nonsense. This is not how we live our lives nowadays. Settlements are not self contained. People are willing and often

have no choice but to travel for services/ work/ facilities in other settlements often through the Green Belt. The Green Belt is simply the area we have to pass through (often on busy roads which in themselves are urbanising features) to reach the towns/ services/facilities it separate.

It is clear we can not prevent the expansion of existing built up areas into parts of the Green Belt. This is often the only land available to ensure new development has access to existing services and facilities within settlement boundaries. We need land for more development. We need to safeguard the amenity of those living with existing settlements and must not develop every green space within settlements just to protect the countryside surrounding settlements for the benefit of those who live within the Green Belt or on the edge of settlements. The role of Green Belt in North Cheshire is obsolete. What exactly are we saving it for? Is it really so vital that neighbouring towns do not merge when functionally they are so interconnected and dependent on each other for services and facilities whether for commuting, leisure, shopping or hospital/ airport journeys. The recreation role of the Green Belt is very limited. The Green Belt has not safeguarded the countryside from encroachment. Policies STRAT9 and DM19 confirm how many exceptions are made for new residential developments in the countryside. AMR reports confirm how many exceptions have been permitted and much of this (eg barn conversions to residential uses) have clearly had an urbanising impact on rural areas and have changed the character of farm buildings, encouraging and normalising new residential areas in locations that are anything but sustainable. Settlements in the Green Belt need more development to support what few facilities are left eg village schools, pubs and shops. Other policies are better able to ensure urban regeneration. Given the scale of development in Chester it is hard to see how the Green Belt serves any purpose in preserving the setting and special character of its historic core.

Surely our planning needs and choice of land for new development would be better informed if it were based on other far more important, fundamental and relevant land use issues such as:

- need to identify and protect our best and most versatile farm land
- protection of ancient woodland
- safeguard important habitats/ SAC/ SPA/ Ramsar sites
- flooding issues

- reduce commuting distances by ensuring new housing is located where it is needed
- designated landscape areas
- air pollution/ noise pollution concerns/ hazardous zones/ HSE pipeline concerns
- contamination
- mineral needs

Question GB 1

Do you agree with the suggested policy approach towards Green Belt and countryside, as set out in GB 1 'Green Belt and countryside' above? If not please suggest how it could be amended.

YES-IT NEEDS MORE THOUGHT BUT IT IS WORRYING THAT THIS IS NOT CLEAR AT THE REG18 STAGE. I WORRY THAT IT WILL BE TOO LATE TO INTRODUCE CHANGES AT REG19 AND WILL NOT GIVE THE PUBLIC PROPER OPPORTUNITY TO COMMENT.

SORRY TO SAY-BUT IT DOES FEEL LIKE THIS REG18 CONSULTATION HAS BEEN RUSHED THROUGH FAR TOO QUICKLY IN ADVANCE OF MORE DETAILED AND CONSIDERED THOUGHT TO THE NPPF CHANGES MADE DECEMBER 2024 AND PPG DATED FEB 2025. IF THE COUNCIL IS UNSURE HOW TO PROCEED HOW CAN THE PUBLIC BE EXPECTED TO COMMENT?.

Question GB 2

Should there be a separate policy for countryside and Green Belt areas?

YES-IT IS VERY CONFUSING TO HAVE THIS COMBINED POLICY GIVEN THE NEED TO DEFER TO NPPF FOR GREEN BELT AREAS.

CAN YOU NOT SIMPLY DEFER TO NPPF FOR GREEN BELT POLICY?

Question GB 3

Are any other uses appropriate in the countryside that should be reflected in the policy?

YES-GYPSY TRAVELLER SITES AS PER PPTS AND IMPLIED IN SOC4

Question GB 4

Should the policy limit redevelopment to that of the same use and other policy compliant development?

IT IS NOT CLEAR FROM POLICY WHAT ISSUES THIS SEEKS TO ADDRESS.

Question GB 5

How else can rural buildings, rural character be protected to and prevent new development harming the intrinsic character through 'urbanising' the countryside?

Greater support for agricultural business to ensure they remain viable and retain the need for existing buildings and help maintain the rural landscape. There is not enough help for, or recognition of, the key role of agri workers and other essential rural workers/ businesses.

Section 20 Gypsy Traveller issues

The following Key issues are identified

- How to meet needs identified through the GTANA (in preparation) to ensure a plan-led approach to development.
- Where sites should be provided if not capable of being delivered within settlements or on suitable previously developed sites.
- Approach to Green Belt/grey belt.
- The Council identifying and delivering a transit site to help reduce and manage unauthorised encampments.

It is not just a question of where sites should be provided but also HOW. Current policy has been flawed. STRAT9 failed to acknowledge guidance in PPTs that GT sites are an accepted use of land in the countryside outside settlement boundaries. DM19 also failed to list GT sites as an exception permitted in countryside along with other exceptions for residential development.

It is incorrect to say adopted policy SOC4 states that sites should be located outside the Green Belt. The criteria reads as follows

-be located outside the Green Belt except in very special circumstances.

Policy as drafted is supportive of sites in the Green Belt where other material considerations exist to provide the VSC needed. But this does not appear to be how the Council has applied its own policy and it is unclear what, if indeed any, combination of other material considerations would suffice to provide those very special circumstances within this district.

As some 42% of the district is Green Belt is unrealistic to assume there will be no need for sites in the Green Belt especially as this is where most Travellers want to live due to the proximity to the urban centres such as Chester and Ellesmere Port and good access to the strategic road network. It has long been established that north Cheshire is the favoured location for many Travellers and that remains the case.

The reliance on windfall sites has failed to meet the need identified in the 2018 GTAA. The Council has overlooked the fact they also had to make provision for those

- a) whose needs could not be ascertained and
- b) those who no longer travelled for an economic purpose and did not meet the PPTS need and whose need should have been met through general housing policies.

Given the revised definition for Gypsy Travellers in PPTS it is likely all need will now be for households complying with the PPTS definition and the scale of need requiring allocated sites will be significant.

I do not agree with the statement

20.8 It is not proposed to develop a rural exception policy under the suggested policy approach, as there are very few areas suitable as identified through the legislation referenced in the Planning Policy for Traveller Sites (PPTS) guidance. See Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the North West and Merseyside) Order 1997 ([S.I. 1997/622](#)).

Whilst I know of no council that has delivered a GT site under the rural exception policy route, given the large number of housing developments permitted this way in CWAC (see AMR) I fail to see why this could not be possible also for Travellers and do not understand why this option is being ruled out. I have seen no report addressing this and am unclear how it can be claimed there are few areas suitable for this option.

Given the high number of unauthorised encampments in the Cheshire area there is a clear need for more transit site provision which those doing need assessments have repeatedly failed to address/assess properly. The Council should consider the potential of private sites to include provision for families/ friends in transit.

Can I recommend to you the policy approach recently drafted for South Gloucestershire (Policy LPS5) with the close cooperation and assistance of an experienced agent working on behalf of the Gypsy Traveller community. I attach an extract of the core policy element. I think you may find the wording for the criteria policy very helpful and you might also find it helpful to speak to the planners about their experience of working collaboratively with the Traveller community on the drafting of this policy which seeks to

- remove all existing sites from the GB

-states that no location should be excluded on the basis of distance to services, but the Council's preference is that new sites are located within appropriate distance to key services and facilities

- Makes a number of allocations for private pitches (intensification / expansion and new sites) to meet most of the need and to provide choice of sites by location, tenure etc .

- Has a specific need figure for socially provided pitches which I understand are to be funded with s106 agreements from strategic housing sites.

- Makes a number of allocations for new small scale sites to ensure provision for in-migration/ new households.

Given the ever increasing cost to Travellers of purchasing land, applying for planning permission, the onerous requirements of BNG provision for many small sites, costs of service connections and high build costs, I do wonder to what extent Councils can or should continue to rely on private provision to meet the needs of this community.

Question GT 1

Do you agree with the suggested policy approach towards Gypsy and Traveller and Travelling Showpersons accommodation, as set out in GT 1 'Gypsy and Traveller and Travelling Showpersons accommodation' above? If not please suggest how it could be amended?

Yes-but as the Council has failed to follow this approach in their existing Local Plan and has failed to identify suitable sites for Gypsy Travellers as part of a bespoke DPD, I struggle to see how you think you will succeed in identifying enough sites at this late stage to meet the existing and future need for Travellers.

The current adopted policy SOC4 is based on a very out of date need assessment from 2014. Policy was not even revised to take account the findings in the 2018 study. The Council has failed to identify suitable land for new sites or even identify broad locations for this use. There has been no attempt to address the cultural need through general housing requirements. The expectation provision will be addressed by expansion or intensification fails to acknowledge the fact that most existing sites are in the Green Belt and have not been removed or inset from the Green Belt and are therefore subject to the usual presumption against inappropriate development in the Green Belt. But most

troubling of all is the fact the Council has incorrectly (until a recent appeal for a site at Heath Lane I August 2025) maintained need has been met and exceeded because it failed to realise it was required to address not just the PPTS need but also need for some 110 pitches for those whose needs were not ascertained and who had a cultural need (at the time) for more pitches but did not meet the PPTS definition (as interpreted by ORS), and also failed to realise that many of the new pitches were being occupied by households who had moved into the district and whose need was additional to that specified in the 2018 study.

The criteria listed under SOC4 need to be revised.

- not have an unacceptable environmental effect is too vague and open ended.

Unacceptable to whom?

- accessible to local services and facilities by walking and/ or public transport is unrealistic and Council officer interpretation of this requirement has often been challenged at appeal (eg Plemsall Lane and Kelsall sites). It does reflect the national policy requirements of PPTS which simply calls for sites to be in a suitable location. There is a clear steer to now have regard to para 13 PPTS/ footnote 57 NPPF. Given the state of public transport, which is often so poor and unreliable that few living in outside urban areas could seriously rely on it, and high reliance on private motor cars by most other households in Cheshire, it is questionable if this requirement is necessary, reasonable and appropriate. No where in CWAC is likely to be so remote as to be unsustainable. If barns can be converted to houses regardless of location so that people can live anywhere in the countryside why is this necessary for Traveller sites?

- be well related to existing settlements is also too vague and open to interpretation. PPTS favours sites that are not away from settlements but does not preclude sites that are.

- not be disproportionate to the scale of existing settlements singly or cumulatively with other sites in the area is again open to interpretation and has been used by objectors/ councillors to dismiss cases for no apparent reason. There needs to be evidence of some particular harm or amenity issue for this to bite or have any significance.

The Council has failed to make adequate provision to date. It has failed the Gypsy Traveller community who have been given no guidance as to where suitable sites might be found and have had to self provide with no help what so ever and at significant cost they can often ill afford. It has failed the settled community who feel that sites are imposed on them without proper considerations. The Council has left itself vulnerable at appeal to proposals that are often retrospective because Travellers need somewhere to stop. These sites are often in the Green Belt as this is the part of the district where Travellers want to live. There is significant incentive for the Council to deliver.

The Council needs to

- a) first update the need assessment**
- b) then publish the need assessment and invite comments from those with the time and inclination to share their thoughts with the Council before it is finalised, to ensure all issues are properly addressed and all sites are included, then**
- c) draft policy to reflect the scale and type of need identified, and ensure enough sites are found in the right locations.**

If it does not, it will leave itself vulnerable at appeal and Travellers will be left with no option but to do their own thing and will buy land where it is available and affordable, and not necessarily in the most appropriate location.

If most of the identified need comes from existing households already living on privately owned sites, it may be appropriate to consider if need can be addressed on these private sites by intensification/ expansion and removing sites from the Green Belt

If the need is from socially provided sites and/ or in migration, new site provision will be necessary.

Allocations on third party landownership must be able to guarantee that the households/individuals with a need will be able to secure a pitch as the Council has no nomination rights over how/ when such pitches are delivered.

In my opinion, as you have no sites in mind at present it will be unreasonable to leave site selection to the Reg19 stage of the Local Plan as it is likely to generate so much interest it will delay the local plan process. I have seen this happen far too often. We need a firm

commitment to find sites and the need to relax the approach taken to ensure sites are found.

It doubt it will suffice to rely on windfall sites. Nor should the Council assume existing sites can be infilled/ expanded to provide more pitches as you do not know if there is a need on these sites for more pitches. It is not uncommon for particular families to exert control over the occupation of pitches which are in private ownership. Similarly different groups of Gypsy and Traveller may have difficulty in living in close proximity to each other and this is a real problem on sites where they rent pitches and have no control over who else might live on the site. Like those in the settled community, Gypsy Travellers want security of tenure (rarely provided when they rent a pitch on a private site), and affordable accommodation. Private sites rarely have any site management policies in place to ensure the security and safety of occupants, or procedures to deal with complaints. Most Traveller households do not have a regular source of income. They can not obtain mortgages. They do not want to be paying high rents and high costs for services (eg electricity, water) through a private landlord. They want their own sites where they can control who they live with and manage their own budgets/ finance. They want their own site where they can come and go as they please-unlike the Council site at Winsford where they need to pre arrange for the height barrier to be opened when they want to leave/ return with their touring caravans. It can not be assumed that need will be met from additional pitches on existing sites as you can not compel the owners of these sites to apply for additional pitches to meet that need. Many can not afford the cost of making further provision.

Even if permission is sought and granted, owners may not choose to implement the permission or offer spare pitches to others, preferring to keep them vacant for years for their own family. Reliance on infill/ expansion will not necessarily result in those pitches being available to all Gypsies and Travellers or to meet the need that is identified. This is not a numbers game. You have to match provision to the need identified.

Finally the Council needs to ensure existing sites retain layouts suitable for Gypsy Travellers pitches (ie with defined space for at least two caravans, day room, parking for works vehicles and amenity space) and scrutinise carefully any plans submitted to change these to mobile home parks, filled with static caravans on small cramped pitches in the hope/mistaken belief this will address the need for more Gypsy Traveller pitches, as is

happening elsewhere in the country. Such sites are often then filled with non Gypsy Travellers as they do not meet the needs of genuine Travellers who need space for works vehicles and do not want to live in a single small static caravan with no day room or space for a touring van.

In short you need to provide choice by location, tenure, size and ownership and not assume that the need identified can be met on existing sites or that families will want to continue living as extended families or will accept others to share their site with them.

Land has to be affordable, accessible and available and sites must respect the cultural traditions of Travellers.

Question GT 2

If sufficient sites cannot be identified in settlements, should the new Local Plan prioritise non-Green Belt /grey belt locations?

This is not a question of 'if'. As you are looking to release land outside settlements for new housing you already know that there is little chance land will be found for low density caravan sites within settlements.

Until you have the results of your need assessment you are unable to gauge the need to release other land but all options need to be taken into consideration.

Given how many sites are already in the Green Belt why are you not considering these sites and insetting them from the Green Belt to facilitate intensification/ expansion?

To date there has been limited demand for sites in the southern part of the district where land outside settlements is ordinary countryside ie non Green Belt.

Question GT 3

Given the small scale of traveller sites, should sustainability tests be reduced so sites can be located away from identified settlements?

Until you know the scale of need you can not assume all sites will be small scale.

It is not clear what sustainability tests you are referring to? Footnote 57 NPPF already tells you that in the case of development involving traveller sites, particular reference should be made to PPTS para 13 which is not concerned with the location of sites or mode of transport. Para 13 takes a holistic approach to the issue is sustainability.

Few parts of the district would be considered so far from services and facilities to be unsustainable but the Council has applied an unreasonable interpretation of SOC 4 by requiring sites to accessible to local services and facilities by walking and/ or public transport in full knowledge that the Council has failed to find suitable sites within settlement boundaries. This criteria has been used to often to thwart provision and this approach has been criticised at appeal (eg Kelsall, Mickle Trafford, Childer Thornton) as being unrealistic and unreasonable.

You need to be pragmatic and sensible if need is to be met and stop looking for reasons to refuse permission for sites that are in reasonable locations.

Most Traveller men (and some women) are self employed. They are tradesmen/ women. They do not work from home offices. They have to travel for work and most need commercial vehicles to carry their tools and equipment. They can not transport their equipment on public transport.

Question GT 4

Should pitches / plots be required on large scale residential/housing sites or allocations?

**ONCE AGAIN NOT KNOWING THE EXTENT OF NEED IT IS DIFFICULT TO KNOW IF THIS WILL BE NECESSARY.BUT GIVEN THE FACT
-THE AUTHORS OF THE 2018 STUDY HAVE ADMITTED THAT THEIR METHODOLOGY HAS GREATLY UNDERESTIMATED NEED IN OTHER STUDIES AND THEY HAVE SINCE HAD TO REFINE/CHANGE THEIR METHODOLOGY,
-THE FAILURE OF THE 2018 GTAA TO PREDICT THE NEED FROM INMIGRATION**

-THE FAILURE OF THE 2018 GTAA TO INCLUDE/ASSESS THE NEEDS OF FAMILIES STOPPING AT/ RESORTING TO THE TOURING SITE AT ROUGH HEY SOUTH OF CHESTER

-THE INABILITY/ FAILURE OF CWAC TO ALLOCATE SITES FOR MOST OF THE NEED IDENTIFIED IN THE 2018 STUDY

-THE TOTAL RELIANCE ON WINDFALL PLANNING APPLICATIONS

-OF THE 130 OR SO PITCHES NEEDED BY 2030 ONLY 30 PITCHES HAVE BEEN GRANTED PERMISSION IN THE FIRST 8 YEARS SINCE THE BASELINE, LEAVING A NEED FOR 100 PITCHES IN THE NEXT 5 YEARS BASED ON THE 2018 STUDY

-THE HIGH NUMBER OF APPLICATIONS PENDING/ APPEAL DECISIONS, AND

-THE NEW PLANNING DEFINITION OF GYPSY TRAVELLERS

IT DOES SEEM HIGHLY LIKELY NEED WILL BE AS HIGH, IF NOT HIGHER FOR MORE PITCHES THAN IN 2018 AND FOR THIS REASON I AGREE THAT THIS MAY BE THE BEST WAY TO ENSURE PROVISION IS MADE IN APPROPRIATE LOCATIONS.

I AM OF THE BELIEF ALLOCATIONS ON STRATEGIC HOUSING SITES WILL HELP ADDRESS NEED AND ENSURE BETTER INTEGRATION OF TRAVELLERS WITH OTHERS. BUT THIS IS COMPLEX. FEW SITES HAVE BEEN DELIVERED THIS WAY BY OTHERS AND IT IS NOT WITHOUT ITS DIFFICULTIES.

IT IS ALSO A MEDIUM/ LONG TERM SOLUTION. IT DOES NOT ADDRESS THE IMMEDIATE NEED.

HOUSEBUILDERS ARE UNLIKELY TO AGREE TO THIS UNLESS IT IS A REQUIREMENT OF ADOPTED POLICY AND CLEARLY SPECIFIED.

IF IT IS OF ANY ASSISTANCE I CAN PROVIDE DETAILS OF OTHER COUNCILS WITH POLICIES/PROPOSALS TO INCLUDE TRAVELLER SITES AS PART OF STRATEGIC HOUSING ALLOCATIONS AS THIS IS AN ISSUE I HAVE BEEN MONITORING FOR SEVERAL YEARS. I ATTACH A STUDY WHICH LOOKED INTO THIS ISSUE FOLLOWING THE MID-DEVON LOCAL PLAN EIP.

It is important to note that allocation is just the starting point. There usually follows a need for

-masterplan preparation

-outline applications and associated s106 agreements/ supplementary planning statements for mixed use schemes and to secure phasing and appropriate conditions to ensure provision is not left until the final phase of the development when it might be difficult to ensure need is met.

-reserved matters applications (often still lacking details for GT sites, their layout etc)

-application to discharge conditions

-implementation (who will provide and manage) and phasing of development

-disposal/ allocation process of site to Travellers ie how will sites be made available to ensure they meet a local need identified in the Local Plan when most are too small to be managed by RSLs.

Housebuilders will argue that they will struggle to sell houses on an estate with a Traveller site and seek ways to avoid doing so. Some have come up with excuses why no suitable parcel of land could be found when land was available for all their houses. Others will ensure GT site provision is as far from housing/ services as possible, on edge of allocation, with its own access so not really integrated eg Clifton to the south of Nottingham and current development or Sandcross Lane Reigate. It needs firm commitment from Councils to see through to implementation.

I would struggle to name any examples of where this has delivered actual sites that are now occupied-but several applications have been made and some have secured planning permission.

Question GT 5

If required as part of allocations or through policy is the threshold of four pitches for every 500 dwellings appropriate?

I am unclear how you can pluck a figure out the air like this

a) not knowing the scale of need to be met this way

b) not knowing how many strategic housing applications will be submitted for 500 or more dwellings, the nature of the development (ie is it mixed use or solely residential), the density/ nature of housing proposed, and where these sites are likely to be located.

Policy needs to be tailored/ drafted to ensure sufficient pitches are delivered by this mechanism to meet long term need.

I am not convinced a policy threshold is appropriate. I think it would be better to consider each allocation on its own merits having regard to the nature of the development proposed.

If you impose a limit like this, I suspect housebuilders will do all they can to keep under the threshold imposed.

The minimum need should be for at least 2 pitches and preferably for 4, with space for additional pitches/ visitors who arrive in their own touring caravans.

Question GT 6

In relation to policy criteria for guiding the allocation of sites are there any locally specific issues that should be included in a policy?

NOT THAT I AM AWARE OF

Question GT 7

Are there any areas of land you would like to put forward for allocation as a Traveller site? If yes please provide details.

The land already owned and occupied by Gypsy Travellers in the district, which do not have permanent permission eg

Land off Coal Pit Lane, between Winsford and Middlewich (dismissed on appeal but could be reconsidered for smaller site having regard to appeal decisions since issued)

Heath Lane Childer Thornton (current appeal)

Land west of Ness Cottage, Coalpit Lane, Mollington (current application)

Parkgate Road, Mollington (current application)

Railway Cottages Nantwich Road (temporary consent)

Pingot Lane and Manley Road Frodsham (temporary consent)

The Paddocks, Chester Road, Dunham on the Hill (still understood to be occupied by Whitehouse family)

Picton Gorse-current application

Sunny bank within Ellesmere Port settlement boundary-current application

Inset all other sites in the Green Belt to facilitate intensification.

Attached

DeMontfort Univ study 2020

Sth Gloucs local plan policy 2025