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Adam Gooch
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Gloucester City Council
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21st December 2020

Dear Mr Gooch,

**INSPECTOR'S INITIAL QUESTIONS AND OBSERVATIONS ON THE
SUBMITTED GLOUCESTER CITY PLAN 2011- 2031**

I have been appointed to examine the recently submitted Gloucester City Plan (GCP). After reading through the submitted documents, I have several initial questions and requests.

Firstly, it would be helpful to me if you could briefly set out the relationship between the adopted Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011- 2031; the progress of any potential review; and how this relates, if at all, to the policies contained within the submission version of the GCP.

In addition, could you confirm whether the GCP, as submitted, is consistent with the 2017 Local Development Scheme and the section entitled *Introduction and Overview* within the GCP, with particular reference to strategic policies¹. Specifically, could the Council clarify if any of the policies within the GCP are intended to replace rather than implement the policies contained within the JCS? If so, which policies within the JCS are to be superseded?

Secondly, I have been provided with an updated five year housing land supply study MN06, dated October 2020. However, it is unlikely that the GCP will be adopted before April 2021. Therefore, it would be helpful if the Council could use its projected housing trajectory to demonstrate if it would be in the position to provide a five year supply of deliverable housing land for the next monitoring year.

Thirdly, since the publication version of the GCP was consulted upon, the Town and Country Planning (Use Classes) (Amendment) (England)

¹ Paragraphs 20-23 and 29- 30 of the Framework.

Regulations 2020 came into force amending the Town and Country Planning (Use Classes) Order 1987. Does the Council consider that this would have any implications on any of the policies within the GCP? For example, whilst I am aware that the GCP does not specifically include retail and town centre policies, some of the site allocation policies such as Policy SA09 and SA17 refer to B1 employment uses. On the basis that this is likely to be a matter that I will raise during the hearings, it may speed up the examination, if the Council could put some thought into how this may impact on the policies of the GCP.

Fourthly, I am aware from my informal contact with Ian Kemp, who is acting as the Council's Programme Officer, that the Council intends to submit a number of Statements of Common Ground (SoCG). I understand that these will include SoCG with Highways England; Gloucestershire County Council (GCC) as Minerals and Waste Planning Authority; and in relation to Water related matters, which I assume will include matters relating to flood risk, the Environment Agency, the Marine Management Organisation and GCC.

Additionally, I am aware that a proposed SocG with GCC is being prepared relating to the provision and cost of highways and education infrastructure. Could the Council give me an indication of when these are likely to be complete? However, I would like to stress that the publication of my Matters Issues and Questions are not dependent on their arrival, although clearly, the sooner they are provided the better.

Going forward, the Council may like to consider the wider use of Statements of Common Ground. For example, with Historic England as a means of examining the consistency of the relevant policy wording with the Framework and with Natural England, to explore how the policies of the JCS relate to the GCP in relation to the requirements for project level Habitat Regulations Assessments, and the costs associated with any mitigation related to the Cotswold Beechwood Special Area of Conservation.

I would stress that this letter represents my initial assessment of the GCP and does not represent all the issues which I am in the process of identifying.

I may have further questions or require additional information. Nonetheless, notwithstanding the above, I expect that I will be able to move to formal hearings relatively early next year.

I will ask Ian Kemp to liaise with you regarding potential dates for the hearings.

Yours Sincerely

Louise Nurser

INSPECTOR