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GLOUCESTER CITY PLAN EXAMINATION

INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS

VERSION 1

The Hearings Programme may be updated. Please ensure that you check the latest position by contacting the Programme Officer or accessing the Examination website at www.Gloucester City.gov.uk.

Please remind yourself of the guidance concerning the format of the hearing at this Examination, contained in the Inspector's Guidance Note.

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Matter 1: Legal Compliance, Sustainability Appraisal, including Duty to Co-operate.

Has the Gloucester City Plan been prepared in line with the relevant legal requirements and procedural matters?

- 1. Has the Gloucester City Plan (GCP) been prepared in accordance with the relevant Act and regulations? Is the GCP consistent with the adopted Joint Core Strategy and with national planning policy? Are there are any significant departures? If so, have these been justified?
- 2. Is the evidence which has been used as the basis of the GCP proportionate, up to date, and have the final versions of all reports been provided?

Local Development Scheme

3. Has the GCP been prepared in accordance with the Local Development Scheme in relation to timing and content?

Statement of Community Involvement

4. Has adequate consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations? Specifically, have all relevant bodies been consulted?

Climate Change

5. Whether the policies of the GCP are designed to secure the development and use of land which contributes to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004? If so, how is this translated into the policies within the GCP and are they effective and consistent with the policies of the JCS? Should climate change issues be given greater emphasis within the GCP or does Policy SD3 of the JCS provide a suitable development management policy?

Sustainability Appraisal

6. Has the GCP been subject to Sustainability Appraisal (SA), including a report on the published GCP, which demonstrates, in a transparent manner, how the SA has influenced the evolution of the GCP making process, and have the requirements for Strategic Environmental Assessment been met? Have all relevant sites been tested through the SA and have all relevant considerations been identified including transport impacts?

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7. Have all reasonable alternatives been considered when implementing the strategic policies of the JCS in relation to policies and sites? Have these reasonable alternatives been considered on a like for like basis? Are there any policies where there were no reasonable alternative options to consider? If so, what is the justification?

Duty to Co-operate

- 8. With reference to the development of the GCP, are there any matters of cross boundary strategic significance, or two- tier matters which require co-operation? If so, what are these, and how have these matters been identified?
- 9. If there are, has the Council co-operated with the relevant local planning authorities, the County Council and appropriate prescribed bodies, in the planning of sustainable development relevant to cross boundary strategic matters contained within the Plan? If so, who has the Council engaged with, and how?
- 10. In considering such matters, has the Council co-operated with those identified above, constructively, actively, and on an on-going collaborative basis throughout the preparation of the GCP?
- 11. Specifically, has the Duty to Co-operate been discharged in a manner consistent with Paragraphs 24- 27 of the Framework, and as defined in Section 33A of the Planning and Compulsory Purchase Act.

Habitat Regulations Assessment (HRA)

- 12. Has the United Kingdom's exit from the European Union had any impact on how internationally designated sites should be considered in plan making, including the production of the Habitats Regulation Assessment, any Appropriate Assessment and any subsequent decision taking¹?
- 13. Have other key stakeholders been consulted including neighbouring authorities?
- 14. Has the Habitat Regulations Assessment been prepared in a manner consistent with the relevant regulations?

¹ Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

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- 15. Is the GCP, as submitted, likely to have a significant effect on European sites either alone, or in combination with other plans or projects? Have these other plans or projects been appropriately identified?
- 16. Have the appropriate assessments of the implications for those sites been undertaken in a manner consistent with the sites' conservation objectives and conservation status?
- 17. In doing so, are the appropriate assessments capable of ascertaining that the GCP as submitted will not adversely affect the integrity of the sites and their qualifying features, either alone, or in combination?
- 18. Has a qualitative, proportionate approach been taken to the potential impacts on the integrity of the sites? If not, should this be the case?
- 19. What is the relationship between the HRA produced in relation to the JCS and that produced for the GCP? Have circumstances altered, if so how, and what are the implications on plan making and future development management decision making? Would it be clear to a developer when a Habitats Regulation Appropriate Assessment would be required and how this should be undertaken? Has the impact of nitrogen deposition on the Cotswold Beechwoods Special Area of Conservation been adequately considered both within the supporting documentation and policy to enable development to take place?
- 20. What role has Natural England played in the production of the HRA and AA? Does Natural England have any outstanding concerns?
- 21. Are the GCP's policies consistent with the recommendations of the HRA, with specific reference to Policy B4, C5, E2, E7 and E8?

Matter 2 Coverage and general approach

Coverage and general approach

- 22. Is the vision of the GCP, and the key principles which have been identified relevant; justified; and consistent with the JCS and national policy?
- 23. Should policies which are identified as being 'strategic' sit within this GCP²?

 Are all the policies within the GCP appropriately identified as strategic and

² Table 1, page 4, Local Development Scheme 2017-2020

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non- strategic³? In the case of policies identified as strategic, are they intended to supersede specific policies within the JCS? If so, which, and what would be the implications of this?

- 24. The submitted GCP period runs to 2031. Therefore, assuming the GCP is adopted in 2021, the effective lifespan of the GCP will be a maximum of 10 years. Is it appropriate to include strategic policies within a GCP which has less than 15 years to run??
- 25. Should the GCP explicitly set out how each of its policies relate to those contained within the JCS?
- 26. The Gloucestershire Waste Core Strategy (GWCS) adopted in 2012, and the Gloucestershire Minerals Local Plan 2018-2032 (GMLP) adopted in March 2020, form part of the wider development plan. As such, should policies reference matters covered by their policies?
- 27. Is it appropriate that substantial reference is made within the text, and policies of the GCP, to strategies and plans⁴ which are not statutory planning documents? How could this apparent issue be resolved?
- 28. Is it appropriate that criteria which appear to be akin to policy wording are included within the supporting text of the GCP⁵, and that supporting text/ background information is contained within the site allocation policies⁶? If not, how could this be resolved to ensure that there is no ambiguity about what is policy and what is not?
- 29. Does the GCP have enough flexibility to adapt to rapid change (para 11 of the Framework)?
- 30. I note that there is no policy reference shown on the key to the Policies Map. Are **all** the policies of the GCP which have a geographical application

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³ Paragraphs 20- 23 and 28- 30 of the National Planning Policy Framework 2019. For example, the site allocation policies are described as strategic within Appendix 5 of the GCP.

⁴ For example, Policy C3 refers to the City Council's Open Space Strategy and Playing Pitch Strategy; Policy D4 refers to the Shopfronts, Shutters and Signage Design Guidelines; Policy G1 states that the policies of the Gloucestershire Local Transport GCP will be used for development management matters; and SA10 refers to the City Council's Concept Statement.

⁵ For example, paragraph 3.1.13 sets out criteria against which a development would be considered.

⁶ See policies SA01- SA22

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clearly and consistently shown on the Policies Map? Is it appropriate that the Policies Map references policies which are not contained within the GCP?

31. Chapter 7 sets out the policies of the 1983 Adopted Gloucester City Plan which will be superseded on adoption of the GCP. This includes all the retail policies. Given that the submission version of the GCP does not include any specific retail policies, will the Council rely on the policies of the JCS and national policy for development management decision making? If so, will it result in a policy void?

Matter 3: Planning and flood risk and water management

Whether the policies relating to flood risk and wider water management issues are justified, effective and consistent with the JCS and national policy?

- 32. Has the GCP been supported by an up to date evidence base in relation to flood risk matters? Are Policies E5 and E6 consistent with the JCS and national policy in relation to the consideration of flood risk and its avoidance, together with appropriate mitigation measures? Is the wording of policy E6 sufficiently flexible and does the policy meet the challenge of flooding and a changing climate? Potential impacts of flood risk on individual site allocations should be addressed in Matter 10.
- 33. With reference to the River Severn and the Gloucester and Sharpness Canal, what is the significance of the Marine Management Organisation in relation to GCP making and decision taking?
- 34. Is the application of the Optional Technical Housing Standard for water efficiency justified and consistent with national policy in relation to need and viability? Should Policy G7 reference a more holistic approach to implementing measures to achieve required levels of water efficiency?

Matter 4: Conserving and enhancing the natural and historic environment

Whether the GCP is justified, effective and consistent with the JCS, and national policy in relation to its approach in enhancing and conserving the natural environment?

35. Should explicit reference be made to blue, as well as green infrastructure within the GCP? Are all relevant designated sites identified on the Policies Map? If not, should they be?

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- 36. Has an appropriate approach been taken to achieving biodiversity net gain within policies B4, E2, E3, E4 and E5? Is there any conflict between the delivery of development and the policies? Should reference be made to British Standards 5837:2012 within Policy E4 and Building with Nature standards within Policy E5? What is the status of Building with Nature standards? Specifically, is the wording of policy E5 consistent with that of policies INF3 and SD9 of the JCS and what does commensurate mean in the context of this policy?
- 37. Is there any duplication between policies C5, E2, E8 and SD9 of the JCS? Are the policies justified and supported by robust and up to date evidence, consistent with recent case law and the provisions of the Conservation of Habitats and Species Regulations 2017?
- 38. As written do policies E2 and E8 adequately consider the impact of both air pollution and recreation on the integrity of the Cotswold Beechwoods SAC and other relevant sites?
- 39. Are the mitigation costs related to recreation impacts justified, reasonable and directly related to development? Is it necessary for individual sitespecific projects to undertake individual Habitat Regulations Appropriate Assessments?
- 40. What certainty is there that policies E2 and E8 together with 'on- going dialogue with NE and neighbouring LPAs through relevant reviews of the JCS, and local GCPs of adjoining Gloucestershire authorities' will be consistent with the findings of the Dutch Nitrogen case⁷?

Whether the GCP provides a positive framework relating to the historic environment consistent with Paragraph 185 of the Framework and Policy SD8, and whether the policies of the GCP are effective, justified, and consistent with its objectives?

- 41. Site specific matters will be addressed in Matter 10. However, as a broader issue, has the Council appropriately considered the historic environment in its allocation of sites and its policies?
- 42. Is the GCP, and are the generic and site-specific policies within the GCP justified by up-to-date evidence relating to the historic environment, including heritage assets most at risk through neglect, decay or other threats? Should there be a specific policy relating to heritage assets most at

 $^{^{7}}$ Joined Cases C-293/17 and C-294/17

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risk, rather than relying on a reference within the supporting text? If so, how should it be phrased?

- 43. Does the wording of the policies accurately reflect the Council's statutory duties? Is there any ambiguity and inconsistency between policies D1, D2 and D3 and paragraphs 189- 202 of the Framework? If so, how could this be resolved?
- 44. Is policy D4 intended only to be applied within conservation areas and in relation to listed buildings? Even if it is, is it over prescriptive, and is it appropriate to refer to the Shopfronts, Shutters and Signage Design Guidelines for Gloucester Supplementary Planning Document within the policy text?
- 45. How does Policy D5 differ from the consideration of the setting of a listed building? How have the buildings been identified?
- 46. Do the policies of the GCP give a clear indication of how a decision maker should react to a development proposal, with reference to the historic environment?
- 47. Is the level of detail set out within the individual site allocations relating to designated and non-designated heritage assets justified and based on evidence, and has this evidence adequately informed the allocation of sites, and any site-specific policies?

Matter 5: Promoting healthy and safe communities

Whether the GCP is justified, effective and consistent with the JCS, and national policy in relation to its approach towards promoting healthy and safe communities?

- 48. Is Policy C1 overly prescriptive? Is it appropriate that the policy should defer to the publication Active Design, and the supporting text refers to developers being 'required to demonstrate how....? Similarly, should the City Council's Open Space and Playing Pitch Strategies, be elevated to the status of policy within policy C3, and the Changing Places Standard included within policy C8?
- 49. Is the wording of Policy C3 effective and consistent with paragraph 97 of the Framework?
- 50. The Town and Country Planning (Use Classes) (Amendment) (England)
 Regulations 2020 came into force amending the Town and Country Planning

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(Use Classes) Order 1987. What, if any, is the implication of the amendments to the Use Classes Order on Policy C4? Is it appropriate that mobile catering units fall within its remit? Is the policy as currently worded effective and suitably flexible? Is the approach of excluding hot food takeaways within 400 m of secondary schools justified by the evidence, and if it is, is it clear how the policy would be applied?

- 51. Is the extent of the Cordon Sanitaire, identified on the Policies Map, justified by robust, up-to-date evidence? Is Policy C6 an effective means to ensure that future development will not be subject to unacceptable levels of odour nuisance?
- 52. Is the wording of Policy C8 suitably clear, so that decision makers and developers understand when enhanced toilet facilities should be provided within larger venues?

Matter 6: Achieving well- designed places

Whether the GCP provides a positive framework relating to the built and natural environment and, whether the policies of the GCP are effective, justified, and consistent with Policies SD3, SD4, and SD6 of the JCS, the GWCS, and national policy?

- 53. Is the wording of Policy F1 effective, specifically what is meant by, 'strongly compliment local distinctiveness'?
- 54. Is it appropriate for all major proposals to be accompanied by a landscape scheme and is the wording of the Policy F2 clear?
- 55. Is there any tension between the environmental objectives of the JCS and the GCP, with particular reference to the criteria contained within policies A1, F3 and F5, ecological and climate change matters, lighting and the provision of parking?
- 56. Is there duplication between the design policies and other detailed policies of the plan? Does this lead to confusion? For example, are E1, E4 and F2 written in such a way, that it is unambiguous how a decision maker should react to development proposals?
- 57. Should explicit reference be made to the appearance of the proposed development with Policy A9?

Matter 7: Promoting sustainable transport and supporting high quality communications

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Whether the GCP is justified, effective and consistent with the JCS, and national policy in relation to its approach to promoting sustainable development?

- 58. Are the proposed levels of development justified by appropriate transport evidence? Notwithstanding that the broad development strategy has been set within the JCS, are the transport policies and allocations contained within the GCP consistent with paragraphs 102- 107 of the Framework?
- 59. Do policies A1, G1, G3 and G4 provide the unambiguous approach to decision making, as set out in paragraph 16 d) of the Framework? Is it appropriate for a local plan policy to defer to other documents which have not been subject to independent examination, and to suggest that the Council is not the decision maker? Should parking standards be included within the GCP?
- 60. Is the principle of Policy G2 consistent with the JCS and national policy, with reference to paragraphs 105 and 110 of the Framework? How would any potential changes to the building regulations impact on the implementation of this policy? Is the wording of the policy effective and suitably flexible to adapt to rapid change in the numbers of electric vehicles, and technological innovation?
- 61. Is it appropriate that Policy G5 requires development to be connected to high speed full-fibre broadband connection? Is the policy effective and consistent with the JCS and paragraph 112 of the Framework?
- 62. Does the wording of policy G6 provide the positive support for the expansion of electronic communications network as expressed by the Framework? Is the supporting text to Policy G6, and specifically paragraph 3.7.24, consistent with the policy text, the policies of the JCS, and the Framework?

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Matter 8: Size, type and tenure of housing

Whether the policies of the GCP are justified, effective and based on up-to-date and reliable evidence, consistent with the JCS and national policy?

Policy A1- Effective and efficient use of land and buildings

- 63. Is this policy effective and consistent with the objectives of the JCS and national policy? How does this policy relate to the design, conservation, and transport policies of the GCP?
- 64. Paragraph 3.1.13 of the supporting text appears to contain criteria to determine whether permission should be granted for Houses in Multiple Occupation. Is it intended that development management decisions would be made on the basis of these criteria? If so, is this appropriate?

Affordable housing-Policy A2

65. Is the wording of the policy effective and consistent with the JCS and national policy? How does the requirement that 25% affordable housing should be provided within market housing, and where relevant, specialist housing (see policy A5 below), relate to Policy SD12 of the JCS? On what basis has the level and mix of affordable housing been set and how would this effect the delivery of the GCP in terms of numbers of units? Should the tenure and mix of affordable housing required be made explicit within the policy?

Estate Density- Policy A3

66. Is the wording of the policy effective to enable redevelopment to a high quality of design and that efficient use is made of brownfield land?

Student Accommodation- Policy A4

67. Is the wording of the policy effective, with particular reference to operational, physical, and business links to further education institutions?

Specialist Housing- Policy A5

68. Is the wording of consistent with policy SD12 of the JCS, with particular reference to the provision of affordable housing? Is the wording of the policy positive, effective and suitably flexible? What is the justification to require a proposed development to be supported by a *sustainable business model*? How would this be determined? What is meant by *excessive*

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concentration of such housing? How can a more positive approach to the provision of specialist housing be set out?

Dwellings with Higher Access Standards- Policy A6

69. Is the policy consistent with Policy SD11 of the JCS? What is the justification to require the thresholds of 50% of all housing within Gloucester City to be built to Building Regulations Part M (Vol 1) Category 2 and 4% of the affordable housing element to be provided at Category 3?

Nationally Described Space Standards- Policy F6

70. What is the local evidence to justify the that all new residential development should meet Nationally Described Space Standards? Is the policy consistent with the JCS and national policy? What impact will this have on the viability of development?

Self- Build and Custom Build Homes- Policy A7

71. Is the approach that developers must, subject to specific thresholds, provide land for self-build and custom build housing consistent with national policy? What role does the local authority have in providing such land? Why were the two figures of 5% net deliverable area of land, and developments of over 20 dwellings plus chosen? Is such an approach justified, effective and consistent with the JCS and national policy? What are the practical implications for determining the quantum of land, or number of serviced plots which are to be marketed and the delivery of the policy objectives? Should other indicators of demand be taken into account other than the Council's Self and Custom Build register?

Gypsies and travellers, and travelling showpeople

- 72. The GCP refers to a need for two Gypsy pitches and 16 Travelling Showpeople plots. Does this remain the case?
- 73. How is it intended that this need is to be met?
- 74. How is the lack of site allocations within the GCP consistent with Policy SD13 of the JCS and, in particular, the proposed delivery via district plans?
- 75. How is the inability to identify any allocations to meet the needs of Gypsies and Travelling Showpeople within the GCP justified by evidence?

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Matter 9: Minerals

Safeguarding of Minerals

76. Whether the approach to the safeguarding of minerals within the policies of the GCP is consistent with the Minerals Local GCP for Gloucestershire 2018-20(MLPG), and in conformity with JCS Policy SD3 of the JCS, and the policies of the Framework?

Matter 10: The delivery of the plan

Whether the proposed development is sufficiently viable to enable the delivery and implementation of the spatial requirements of the JCS?

- 77. Is there appropriate certainty, and evidence that infrastructure provision will be provided at an appropriate quantum, in a timely fashion, and at appropriate suitably accessible locations, so as to support the delivery of the growth proposed within the GCP and the JCS?
- 78. Should affordable housing be promoted ahead of other forms of infrastructure or policy requirements as referenced in paragraph 3.7.30 of the GCP?
- 79. Does the evidence demonstrate that the level of development proposed within Gloucester, and defined within the JCS, will be viable and deliverable given the wider policy requirements of the GCP, such as ensuring developments are in keeping with the historic city, and the specific policy requirements which have been the subject of specific viability testing? Are these specific policy requirements and costs broadly consistent with those set out within the JCS? If not, what is the justification for any divergence between the two?
- 80. Are the assumptions, on which the Gloucester City Plan Viability Report and Addendum⁸ are predicated, transparent? Is there any divergence between the basis on which the CIL charging levels were set and those underpinning the viability assessment (VA) reports? If so, what is the significance of this?
- 81. How has the amendment to the Community Infrastructure Regulations 2010 affected the Council's approach to the delivery of infrastructure? What impact will this have on the timing and viability of the delivery of proposed developments?

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⁸ VIA001 and VIA002

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- 82. My understanding is that the viability assumptions set out within the September 2019 Viability Report have been amended in relation to updated Sales Values, Build Costs, S106 contributions, more up to date mitigation costs relating to the Beechwood SAC, and marginal increases in CIL levels. Is this approach justified by evidence? Is the quantum of S106 contributions tested realistic and justified by evidence? Have any changes to benchmark land values been considered? Also, should Tables A5, A6 and A7 be rerun using the 2020 Local Housing Needs Assessment preferred affordable housing tenure mix?
- 83. What would be the implication on the plan, if the viability evidence clearly demonstrated, on a plan wide basis, that the development proposed in the GCP was not viable?
- 84. What purpose is served by Policy G8 with reference to individual developments and developer contributions?

Whether the following proposed site allocations, are justified, based on up-todate evidence, effective, and consistent with national policy?

- 85. Taking each of the following proposed site allocations individually:
 - What is the background to the site allocation? How was it identified and which options were considered?
 - How have the wider transport implications of the proposed development been considered?
 - What is the scale type/mix of uses proposed?
 - What is the basis for this and is it justified?
 - What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?
 - What are the benefits that the proposed development would bring?
 - How does the site relate to nearby uses?
 - What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?
 - How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
 - What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?
 - Is the site available, realistically viable and deliverable?

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- What is the expected timescale and rate of development and is this realistic?
- Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- Is the terminology used within the relevant site-specific policy consistent and clear?

NB. In responding to the questions on the site allocations the Council should identify and address specific key concerns raised in representations and my MIQs above, for example, in terms of adverse impacts, delivery etc.

SA01	Land at The Wheatridge		
SA02	Land at Barnwood Manor		
SA03	Former Prospect House		
SA04	Former Wessex House, Great Western Road		
SA05	Land at Great Western Sidings		
SA06	Blackbridge Sports and Community		
SA07	Lynton Fields, Land East of Waterwells Business Park.		
SA08	Kings Quarter		
SA09	Former Quayside House, Blackfriars		
SA10	Former Fleece Hotel and Longsmith Car Park		
SA11	Land at rear of St Oswald's Retail Park		
SA12	Land at Rea Lane, Hempsted		
SA13	Former Colwell Youth and Community Centre		
SA14	Land off New Dawn View		
SA15	Land South West of Winneycroft Allocation		
SA16	Land off Lower Eastgate Street		
SA17	Land South of Triangle Park (Southern Railway Triangle)		
SA18	Jordan's Brook House		
SA19	Land off Myers Road		
SA20	White City Community Facility		
SA21	Part of West Quay, the Docks		

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Matter 11: Identifying and maintaining a supply of housing

Whether the GCP has been positively prepared and whether it is justified, effective and consistent with the JCS, and national policy in relation to the approach towards the provision of housing?

- 86. Do the policies of the GCP support the Government's objective of significantly boosting the supply of homes? How will proposals for housing on unallocated sites be determined? Should it be made clear how much housing should it be provided over the plan period within the administrative boundary of the city?
- 87. Notwithstanding the ongoing review of the JCS, and that it is accepted that Gloucester cannot realise all its housing needs without help from neighbouring authorities, does the GCP identify enough land for housing to be delivered, consistent with Policies SP1 and SP2 of the JCS?
- 88. How have windfalls been defined and is there compelling evidence to support future estimates?
- 89. Does the GCP demonstrate that there will be a five-year housing supply of deliverable housing at the time of adoption? Has the GCP identified specific developable site or broad locations for growth for years 6- 10 of the GCP? If not, what is the significance of this, given the ongoing review of the JCS?
- 90. Should the GCP include a housing trajectory with specific reference to the delivery of housing identified within the GCP?

Matter 12: Building a strong, competitive economy

Whether the GCP has been positively prepared and whether it is justified, effective and consistent with the JCS, and national policy in relation to the approach towards the provision and protection of land for employment uses, cultural and tourist, and town centre uses?

- 91. Should it be made explicit how much land should be provided for employment uses over the plan period within the administrative boundary of the city?
- 92. Notwithstanding the ongoing review of the JCS, does the GCP identify enough land capable of being delivered within the GCP period, consistent with policies SP1, SP2 and SD1 and SD2 of the JCS?
- 93. Is the requirement for a skills plan set out within Policy B1, consistent with the JCS and national policy? Is the wording of the policy effective?

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- 94. Since, the publication version of the GCP was consulted upon, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force amending the Town and Country Planning (Use Classes) Order 1987. What, if any, is the implication of the amendments to the Use Classes Order on policies B2, B3 and B5. What modifications can be made to ensure that the policies remain consistent with the objectives and policies of the JCS and national policy? Should the reference to the Cultural Strategy and Vision be included within the policy text of Policy B5??
- 95. Is the scope of Policy B4 too restricted? Should the interests of existing employment uses be referenced within the policy?
- 96. Is Policy B6 written in such a way that it is clear what is required to enable Planning permission to be granted? Is it appropriate that criteria a)- e), set out within paragraph 3.2.29, appear to be determinants of whether Planning permission would be granted?

Matter 13: Implementation, delivery, and monitoring

97. Does the GCP have clear and effective mechanisms for implementation, delivery and monitoring?

END