



The countryside charity
Gloucestershire

April 2021

Gloucester City Plan Examination

Response to Matters, Issues and Questions

By CPRE Gloucestershire

Introduction

CPRE Gloucestershire welcomes the opportunity to address the questions set by the Inspector and thereby supplement its earlier representations. Gloucester, like Cheltenham, cannot reasonably be described as rural. However, the Gloucester City Plan is of great interest to us owing to the increasing inter-relatedness of strategic planning issues in the County. This is reflected in its organization within the County: one CPRE's District Groups, like the JCS, covers Gloucester, Cheltenham and Tewkesbury.

We have confined our further response to Matters 1 and 11 and do not see the need to amplify what we wrote previously in respect of other matters. However, we consider the issues raised under Matters 1 and 11 to be in need of urgent resolution as well as being complicated, which is why we have found it necessary to write at some length. A commitment to an immediate review of the JCS was part of the adopted JCS in the form of Policy REV1 - as opposed to any subsequent decision – but no progress beyond Issues and Options has been made. Progress on the review could reasonably have been expected to illuminate this Examination, but unfortunately this is not the case.

Conclusion

We conclude that the submitted version of the GCP is unsound in respect of these Matters.

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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 any significant departures? If so, have these been justified?

In respect of the second of these questions, the GCP could be regarded as consistent with the adopted Joint Core Strategy. However, in our view the JCS itself is in some respects flawed and the GCP does nothing to mitigate its shortcomings. More detail is set out below.

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?

There may be a number of matters of strategic significance, but by far the most important single matter in CPRE's view is the amount and distribution of housing, in the context of the amount of land taken by residential development in comparison with other uses. This issue is covered by the opening paragraphs of Section 4 of the GCP. We consider these unsatisfactory for reasons set out below.

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?

The existence of the JCS is in itself evidence of a degree of co-operation between the three constituent authorities. This however has some disadvantages which are briefly referred to in the response to Question 10. The County Council has had next to no influence on strategic planning since a review of the Structure Plan was abandoned in 2005. A degree of co-operation with Stroud District Council (SDC) might have been expected precisely because SDC was not included in the JCS. The Stroud District Local Plan (SDLP) was adopted in November 2015 and like the JCS and GCP runs to 2031. It makes no provision for housing in the

District to help meet needs arising from Gloucester which cannot be met within the City's own boundaries. This in our opinion has significantly reduced the degree of strategic choice available and added to the burden placed on Tewkesbury Borough, thereby contributing much to the current difficulties. The possibility of helping to meet Gloucester's needs has arisen in the current review of the SDLP. Page 49 of the draft Plan (November 2019) refers. However, whatever co-operative efforts have been made by the two councils, or between the JCS authorities collectively and SDC, we have seen little indication of how the review of the JCS will engage with that of the SDLP, particularly since the former is running well behind the latter.

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?

The fact that the GCP has been drawn up as a plan subsidiary to the JCS means that the scope for collaboration with any council not in the JCS area has been inhibited.

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?

We do not comment on the extent to which engagement has taken place with communities or the other "relevant bodies" to which paragraph 25 refers. However, the situation in respect of strategic policy making authorities alone appears to us unsatisfactory, particularly in respect of the last clause of paragraph 26 – the issue of "whether development needs that cannot be met wholly within a particular plan area could be met elsewhere".

At the time of writing, the City Council has published six Statements of Common Ground in accordance with paragraph 27. However, none of these in our opinion goes to the heart of the matter. In particular, we note that paragraph 4.7 of SoCG1 delegates the issue of the shortfall in housing provision to the JCS review.