



Local Plans Team
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

18 January 2019

Dear Sir/Madam,

Stroud District Local Plan Review: Emerging Strategy Paper

Thank you for inviting responses to the Stroud District Local Plan Review: Emerging Strategy Paper. This response has been prepared on behalf of the Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council as the Joint Core Strategy (JCS) authorities.

The JCS authorities welcome the fact that Stroud District Council is progressing its Local Plan Review. As you are aware, the JCS authorities have also recently commenced the review of the JCS, having recently completed the Issues and Options consultation, providing an opportunity for alignment between the two processes in addressing strategic planning issues. It is important that any cross-boundary issues that are present between the two plan areas are dealt with through the concurrent development of our respective plans.

Making Places: Shaping the future of Gloucester's rural fringe

It is noted that two potential residential development opportunities are identified at G1 'South of Hardwicke' and G2 'Land at Whaddon' and PS32 'South of M5 / J12'. In respect of the sites at G1 and G2, the paper identifies that these sites may have the potential to contribute towards meeting Gloucester's unmet housing needs.

As you are aware, the Adopted JCS identifies a housing shortfall for Gloucester of around 1,000 dwellings between 2028 and 2031. Policy REV1 of the Adopted JCS requires the JCS authorities to undertake an immediate partial review of the plan in respect of housing supply. However, the JCS Review consultation presents options for undertaking a comprehensive plan review, beyond just the existing housing shortfall, extending the plan period to 2036 or beyond. If this approach is taken forward, there will of course be additional housing need to plan for over and above the identified shortfall, using the Government's standard methodology as a starting point.

The Adopted JCS sets out, at paragraph 7.1.18, that the plan review will consider development options both within and outside the JCS area to address Gloucester's housing needs. It recognises the Statement of Cooperation that the JCS authorities have with Stroud District regarding the need to explore meeting unmet needs arising from the JCS area within Stroud District and for the review

to be undertaken in tandem with that of the Stroud Local Plan. The JCS Review consultation follows on from this and sets out the following position at paragraph 12.14:

'The JCS acknowledges the importance of Stroud District as an authority adjoining Gloucester City that could help address the requirement for new homes where reasonable to do so and consistent with sustainable development. With this in mind, the emerging Stroud Local Plan Review has identified sites south of Gloucester City as potential development opportunities and these will be considered further, along with other potential opportunities, as the JCS Review and Stroud Local Plan progress.'

This position remains the case. The JCS Review Issues and Options consultation included a 'call for sites' and it will be necessary to test any submissions alongside all other reasonable alternatives, in the context of the scope of the review, including for example the level of housing need. We are pleased to note that the authorities are already working together in defining the methodology and progressing that assessment.

Notwithstanding the above, the JCS authorities are of the view that if any sites abutting Stroud District's boundary with Gloucester City are to be allocated, or indeed granted planning permission in advance of the adoption of the Stroud Local Plan Review, the housing supply should be allocated to Gloucester's housing need. This aligns with what has been alluded to in the consultation document as well as the spatial strategy of the adopted JCS.

Statement of Common Ground

As you are aware, the National Planning Policy Framework (NPPF) strengthened the duty to cooperate through Statements of Common Ground. Paragraph 27 states 'In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these'.

We are pleased to say this is already being progressed as a county and we look forward to working with you, and the other Gloucestershire districts, in taking this forward. Once complete, this will replace the Memorandum of Understanding that already exists between the authorities.

Yours faithfully,

Joint Core Strategy Authorities