

Strategic Planning
Shire Hall
Westgate Street
Gloucester
GL1 2TH

Date

Dear Sir/Madam

**GLOUCESTERSHIRE HIGHWAY MODEL THIRD PARTY ACCESS PROTOCOL –
PUBLIC CONSULTATION**

Thank you for consulting Gloucester City Council on the above draft protocol. The response below is provided by Planning Services and is structured in accordance with the consultation questionnaire.

- 1. Do you agree that the proposed change to the access protocol provides improved transparency and is fair and equitable for third party use? (Please indicate your level of support and add comments to explain you level of support)**

Strongly disagree – While the proposed changes to the access protocol may improve transparency with regard to charging to use the model it is neither fair or equitable under the 2011 Localism Act that local planning authorities should pay a commercial rate for access to the model in association with development plan preparation when the County Council have a Duty to Co-operate in the preparation of statutory development plans.

Gloucester City Council contend that a much reduced bespoke charge be introduced for use of the model for development plan preparation.

Gloucester City Council appreciate that while the multiplier used in the proposed new protocol will reduce charges overall it is maintained that local planning authorities, who are increasingly facing public sector financial challenges, should not pay the equivalent rate of the private development sector in order to use the model, especially given the provisions of the Localism Act.

- 2. Do you agree the proposed ‘Standard Model Access’ charge outlined in section 3.1 is appropriate? (Please indicate your level of support and add comments to explain you level of support.)**

Strongly disagree – for the reasons described above.

- 3. Do you agree the proposed ‘Fixed Item’ charges outlined in section 3.2 are appropriate? (Please indicate your level of support and add comments to explain you level of support.)**

Strongly disagree – for the reasons described above.

- 4. Do you agree the proposed charges for ‘Specific Model Testing’ outlined in section 3.3 are appropriate? (Please indicate your level of support and add comments to explain you level of support.)**

Strongly disagree – for the reasons described above.

5. Are there any further comments you wish to make regarding the proposed third party charging protocol?

Nothing to add to the point raised above.

I trust the above comments are useful and will be given due consideration in the preparation and adoption of the revised charging schedule protocol.

If you have any questions or concerns or would like to discuss anything further please do not hesitate to contact me.

Yours sincerely,

Anthony Wilson
Head of Planning