



Planning Policy Sub Committee

Meeting: Thursday, 18th June 2015 at 6.00 pm in Civic Suite, North Warehouse, The Docks, Gloucester, GL1 2EP

Membership:	Cllrs. Taylor (Chair), Lewis (Vice-Chair), McLellan, Smith and Dee
Contact:	Tony Wisdom Democratic Services Officer 01452 396158 anthony.wisdom@gloucester.gov.uk

AGENDA

1.	<p>APPOINTMENTS MADE AT ANNUAL COUNCIL</p> <p>To note the following appointments made at the Annual Meeting of the Council:-</p> <p>Chair: Councillor Taylor Vice-Chair: Councillor Lewis Members: Councillors McLellan, Smith and Dee.</p>
2.	<p>APOLOGIES</p> <p>To receive any apologies for absence.</p>
3.	<p>MINUTES (Pages 5 - 8)</p> <p>To approve as a correct record the minutes from the meeting held on 26 March 2015.</p>
4.	<p>DECLARATIONS OF INTEREST</p> <p>To receive from Members, declarations of the existence of any disclosable pecuniary, or non-pecuniary, interests and the nature of those interests in relation to any agenda item. Please see Agenda Notes.</p>
5.	<p>PUBLIC QUESTION TIME</p> <p>To receive any questions from members of the public provided that a question does not relate to:</p> <ul style="list-style-type: none"> • Matters which are the subject of current or pending legal proceedings, or • Matters relating to employees or former employees of the Council or comments in respect of individual Council Officers
6.	<p>PETITIONS AND DEPUTATIONS</p> <p>To receive any petitions and deputations provided that no petition or deputation is in relation to:</p>

	<ul style="list-style-type: none"> • Matters relating to individual Council Officers, or • Matters relating to current or pending legal proceedings
7.	<p>CITY PLAN: PLACES, SITES, CITY CENTRE STRATEGY - RESPONSE TO PUBLIC CONSULTATION (Pages 9 - 76)</p> <p>To receive the report of the Cabinet Member for Housing and Planning which updates Members on the Officer responses to the comments received on the City Plan Places, Sites, City Centre Strategy consultation held in May 2013.</p>
8.	<p>STATEMENT OF COMMUNITY INVOLVEMENT (Pages 77 - 112)</p> <p>The report provides an update on the Council's Statement of Community Involvement (SCI) following its public consultation and seeks approval for its formal adoption.</p>
9.	<p>DATE OF NEXT MEETING</p> <p>Thursday, 17 September 2015 at 6.00pm</p>

M. Shields

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Martin Shields
Corporate Director of Services and Neighbourhoods

Date of Publication: Wednesday, 10 June 2015

NOTES

Disclosable Pecuniary Interests

The duties to register, disclose and not to participate in respect of any matter in which a member has a Disclosable Pecuniary Interest are set out in Chapter 7 of the Localism Act 2011.

Disclosable pecuniary interests are defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 as follows –

<u>Interest</u>	<u>Prescribed description</u>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the Council) made or provided within the previous 12 months (up to and including the date of notification of the interest) in respect of any expenses incurred by you carrying out duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between you, your spouse or civil partner or person with whom you are living as a spouse or civil partner (or a body in which you or they have a beneficial interest) and the Council (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged
Land	Any beneficial interest in land which is within the Council's area. For this purpose "land" includes an easement, servitude, interest or right in or over land which does not carry with it a right for you, your spouse, civil partner or person with whom you are living as a spouse or civil partner (alone or jointly with another) to occupy the land or to receive income.
Licences	Any licence (alone or jointly with others) to occupy land in the Council's area for a month or longer.
Corporate tenancies	Any tenancy where (to your knowledge) – (a) the landlord is the Council; and (b) the tenant is a body in which you, your spouse or civil partner or a person you are living with as a spouse or civil partner has a beneficial interest
Securities	Any beneficial interest in securities of a body where – (a) that body (to your knowledge) has a place of business or land in the Council's area and (b) either – i. The total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or ii. If the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, your spouse or civil partner or person with

whom you are living as a spouse or civil partner has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

For this purpose, “securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

NOTE: the requirements in respect of the registration and disclosure of Disclosable Pecuniary Interests and withdrawing from participating in respect of any matter where you have a Disclosable Pecuniary Interest apply to your interests and those of your spouse or civil partner or person with whom you are living as a spouse or civil partner where you are aware of their interest.

Access to Information

Agendas and reports can be viewed on the Gloucester City Council website: www.gloucester.gov.uk and are available to view five working days prior to the meeting date.

For further details and enquiries about this meeting please contact Anthony Wisdom, 01452 396158, anthony.wisdom@gloucester.gov.uk.

For general enquiries about Gloucester City Council’s meetings please contact Democratic Services, 01452 396126, democratic.services@gloucester.gov.uk.

If you, or someone you know cannot understand English and need help with this information, or if you would like a large print, Braille, or audio version of this information please call 01452 396396.

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If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions:

- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building; gather at the assembly point in the car park and await further instructions;
- Do not re-enter the building until told by a member of staff or the fire brigade that it is safe to do so.



PLANNING POLICY SUB COMMITTEE

MEETING : Thursday, 26th March 2015

PRESENT : Cllrs. Taylor (Chair), Smith and Dee

Officers

Anthony Wilson, Head of Planning

Helen Chard, Housing Strategy & Enabling Service Manager

APOLOGIES : Cllrs. Lewis and McLellan

21. MINUTES

The minutes of the meetings held on 11 December 2014, 12 February 2015 and 4 March 2015 were approved as correct records and signed by the Chair.

22. DECLARATIONS OF INTEREST

There were no declarations of interest.

23. PUBLIC QUESTION TIME (15 MINUTES)

There were no questions from members of the public.

24. PETITIONS AND DEPUTATIONS (15 MINUTES)

There were no petitions or deputations.

25. TEWKESBURY BOROUGH PLAN 2011 - 2031 DRAFT POLICIES AND SITE OPTIONS - PUBLIC CONSULTATION

Members were presented with a report which set out an overview of the key issues Officers had identified in relation to the Tewkesbury Borough Plan 2011-2031 Draft policies and site options public consultation (February 2015). The report provided a letter of representation which was proposed to be sent to Tewkesbury Borough Council as the City Council's response to the consultation as a strategic partner.

PLANNING POLICY SUB COMMITTEE
26.03.15

Planning Policy Sub-Committee was asked to recommend that it endorsed Appendix 1 as the Council's response to the consultation.

RESOLVED – That Appendix 1 be endorsed as the Council's response to the Draft Tewkesbury Borough Plan Draft Policies and Site Options Public Consultation (Feb 2015).

26. GLOUCESTERSHIRE LOCAL TRANSPORT PLAN 2015-31 CONSULTATION AND PROTOCOL FOR HIGHWAYS MODELLING SUITE CONSULTATION

Members were presented with a report which provided an overview of the key issues identified by Officers in relation to the Gloucestershire Local Transport Plan 2015-31 public consultation and which sought endorsement of Appendix 1 as the Council's formal response to the consultation. The report also set out an overview of the Gloucestershire protocol for third party access to the highways modelling suite consultation and sought endorsement of Appendix 2 as the Council's formal response to the consultation.

Councillor Smith recommended that the City Council should contact the other district councils asking them to reinforce the points made by Gloucester City Council.

RESOLVED

- (1) That Appendix 1, response to the Gloucestershire Local Transport Plan 2015-31 public consultation be endorsed.**
- (2) That Appendix 2, response to the Gloucestershire Third Party Access Protocol for using the Highways Modelling Suite Consultation be endorsed.**

27. RESPONSE TO CLG CONSULTATION - SECTION 106 PLANNING OBLIGATIONS, SPEEDING UP NEGOTIATIONS CONSULTATION

Members were presented with a report which sought their approval for a proposed response from Gloucester City Council to the Department of Communities and Local Governments Consultation (DCLG) on speeding up Section 106 negotiations.

Councillor Smith remarked that the Council's response to Question 4 '*Do you agree that legislative change is required to bring about a significant reduction in the delays associated with negotiating Section 106 agreements*' was weak and would not provide a resolution to the problem. Councillor Smith suggested that there should be a cut off point for developers to make any changes to Section 106 agreements to avoid them submitting revised versions a couple of days before Planning Committee. The Chair concurred with this comment. It was agreed that the Head of Planning would seek legal advice on revised wording for the response to Question 4 and email it to the Sub-Committee Members.

**PLANNING POLICY SUB COMMITTEE
26.03.15**

RESOLVED – That subject to the required amendments to the response to Question 4, that Appendix 1 be endorsed as the City Council’s response to the DCLG Consultation on Speeding Up Section 106 Negotiations.

28. SCI/CIL UPDATE

Members received an update on the Statement of Community Involvement.

The Head of Planning reported that there had been 200 ‘hits’ on the website and less than 20 representations. The closing date for comments was 31 March 2015.

Community Infrastructure Levy

The Head of Planning advised Members that he had received a preliminary draft on the charging structure for the Community Infrastructure Levy. A report would be submitted to the Annual Council Meeting on 21 May 2015 and it would be necessary to brief Members on its content at Planning Committee on 12 May.

RESOLVED – That the update be noted.

29. DATE OF NEXT MEETING

Thursday 18 June 2015 at 18.00 hours.

**Time of commencement: 18:00 hours
Time of conclusion: 18:50 hours**

Chair

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Gloucester City Council

Meeting:	Planning Policy Sub-Committee	Date:	18 June 2015
Subject:	City Plan: Places, Sites, City Centre Strategy – Response to Public Consultation		
Report Of:	Cabinet Member for Housing and Planning		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Anthony Wilson, Head of Planning		
	Email: anthony.wilson@gloucester.gov.uk		Tel: 39-6830
	claire.rawlings@gloucester.gov.uk		
Appendices:	1. Schedule of Responses		

FOR GENERAL RELEASE

1.0 Purpose of Report

- 1.1 This report is a City Plan update report to inform Members of the officer responses to the comments received to the City Plan Places, Sites, City Centre Strategy consultation held in May 2013.

2.0 Recommendations

- 2.1.1 Planning Policy Sub- Committee is asked to:

- (1) Note the representations made to the City Plan: Places, Sites, City Centre Strategy during the public consultation period.
- (2) Endorse the resulting officer responses set out within the response schedule provided at Appendix 1.

3.0 Background: City Plan

- 3.1 The Council has a statutory responsibility under Section 13 of the Planning and Compulsory Purchase Act 2004 to prepare and keep up to date a development plan for the City. In this respect, the Planning Policy Team is preparing two plans that will shape the future of planning in the City. These are the Joint Core Strategy (the JCS) and the City Plan. Together, these plans will provide the planning tools that the Council is legally obliged to prepare to support and guide land use change and development activity in the City until 2031.
- 3.2 The JCS will address strategic issues for Gloucester City, Cheltenham and Tewkesbury Boroughs and set housing, employment and other infrastructure requirements for the three local authorities. The Council is working with our

neighbouring local authorities on this plan because a proportion of the future housing/employment needs of the City will have to be met within Tewkesbury Borough. The JCS is currently being examined with hearings taking place from May to July 2015. It is hoped that the JCS will be adopted towards the end of 2015.

- 3.3 Alongside the JCS, there is a need for a City Plan. This 'second tier' development plan will clarify how the policies in the JCS will be applied in the City. It will set out the Council's priorities for the City Centre and identify other key sites that will deliver future housing and jobs. It will establish detailed policies against which planning applications will be determined and will demonstrate how new infrastructure, to meet the City's needs, will be funded. Finally, the City Plan will provide the basis for the preparation of any Neighbourhood Plans that may come forward.
- 3.4 The Planning Policy Sub Committee gave approval in March 2011 for work to start on the City Plan. The Plan is prepared through a number of stages of evidence gathering and the drafting of policies before it can be submitted for public examination. At each stage of plan preparation, the Council is obliged to consult the public and take into account the comments received. This Plan needs to be prepared alongside the JCS and be in conformity with it.

The Council has resolved that the City Plan be prepared on the basis of four interlocking parts:

- (a) **Part 1** sets out the overarching vision, development challenges and development principles.

Progress made: This has been prepared and has been subject to consultation.

- (b) **Part 2** will set out a locally based approach to places and site opportunities.

Progress made: The subject of this report.

- (c) **Part 3** will set out development management policies.

Progress made: It is currently anticipated that consultation on policies will take place later in the year although this is dependent on progress made with the JCS examination and the completion of ongoing evidence base work.

- (d) **Part 4** will deal with site delivery and infrastructure provision.

Progress made: This will be prepared as part of the submitted plan.

- 3.5 As per the latest Local Development Scheme, it is anticipated that the City Plan will be submitted to the Planning Inspectorate in late 2016 with adoption expected Autumn 2017. This is dependent on achieving adoption of the JCS in Autumn 2015.

4.0 Part 2: Places and Sites, City Centre Strategy Consultation and Responses

- 4.1 The Planning Policy Service undertook a consultation from May to July 2013 on Part 2 of the Plan. This part of the Plan focuses on the individual wards within the City. The consultation sought views on the available development sites in each area as

well as feedback on Ward Profiles. The Ward Profiles provide an evidence base for the whole of the City. Feedback was also sought on a draft City Centre strategy which seeks to manage the changes that the City Centre is expected to experience as our retail centres move forward and our shopping habits change. Further work is progressing on this with the Council's economic development team.

- 4.2 Officers and consultants from Gloucestershire Rural Community Council (GRCC) attended 18 separate consultation events which were attended by 995 members of the public. GRCC prepared a separate report on the local matters which were raised. This report has been forwarded onto Neighbourhood Management for information.
- 4.3 During the consultation period 142 formal questionnaire planning responses were received. A schedule of the comments received and officer responses are provided at Appendix 1.
- 4.4 Many responses related to issues that will be further considered through ongoing evidence gathering. At its meeting on 18 March 2015, Council approved a budget for the City Plan which has enabled officers to begin the process of instructing further work in the fields of Highways, Playing Pitch, Retail Assessment for South Gloucester, Biodiversity, Heritage and Design, and Flooding.
- 4.5 Topics receiving 15 or more responses related to:
- 41 individual comments relating to the City Centre – including Docks (20), Kings Quarter (17).
 - 21 individual comments relating to SHLAA (part of the evidence base which assesses potential housing land).
 - 17 relating to the Sustainability Appraisal Process of the Plan.
 - 56 relating to Hempsted – Site WS12 Land East of Hempsted (40), Site WS13 Land at Rectory Lane (19), Site WS14 Land at Rea Lane (20).
 - 24 relating to the site Land at the Wheatridge Abbey – Public Open Space (18), biodiversity(17).
- 4.6 Some additional sites were identified including Land at Whaddon which is located to the south of the City and is also being pursued through the Stroud Local Plan and the JCS.
- 4.7 The delay in presenting the findings of this consultation to members resulted from having to bid, purchase and then install a City Plan database system to administer the representations submitted as well as balancing staff resources with progression of the JCS.
- 4.8 The additional evidence base being commissioned and the responses gained from this consultation will help progress the preparation of the City Plan.

5.0 Next Stages

- 5.1 The next stage of City Plan involves the commissioning of evidence to support plan allocations and the development of policies. In addition the progress of the JCS examination will be closely followed to assess any implications for the City Plan.

6.0 Reasons for Recommendations

- 6.1 This report has outlined the officers responses to the representations made to the City Plan consultation and these will be used to inform progression of the City Plan.

7.0 Financial Implications

- 7.1 A budget has been approved for the City Plan process.

(Financial Services have been consulted in the preparation of the report)

8.0 Legal Implications

- 8.1 The City Plan forms part of the Council's statutory emerging development plan and it is essential to have a plan led system at the local level if the planning system is to deliver sustainable development and growth.

(Legal Services have been consulted in the preparation of the report)

9.0 Risk & Opportunity Management Implications

- 9.1 There will be a delay to the City Plan programme if the current Joint Core Strategy programme is not met. It is important that the two plans are aligned both through their process and their content, and that changes to the JCS programme in particular is taken account of for the City Plan. Therefore the current ongoing examination of the JCS is an important influence on the City Plan programme and an opportunity to take stock.

10.0 People Impact Assessment (PIA):

- 10.1 The PIA Screening Stage did not identify any potential or actual negative impact, therefore a full PIA was not required.

11.0 Other Corporate Implications

Community Safety

- 11.1 None.

Sustainability

- 11.2 The City Plan is subject to a statutory sustainability appraisal process which incorporates the requirements of Strategic Environmental Assessment.

Staffing & Trade Union

11.3 None.

Background Documents:

City Plan Scope

City Plan Part 1

City Plan Part 2 Places, Sites, City Centre Strategy

Ward Area Profiles

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City Plan Places, Sites, City Centre Strategy Consultation Responses

City Centre

City Centre Strategy

Issue	Representation	Response
General direction of travel	General support for the general thrust of the draft City Centre Strategy as it provides a firm commitment to improving retail, leisure, culture, business and entertainment in the city.	Support noted
Relationship between the City Centre and Gloucester Quays	Concerns regarding the relationship between the City Centre and Gloucester Quays. Concern that Gloucester Quays undermines the City Centre and that there is a need to ensure that they complement rather than compete with one another. Improve linkages.	Gloucester Quays is subject to a condition that restricts the types of goods that can be sold to ensure it does not directly compete with the City Centre. Any retail proposals at Gloucester Quays would be subject to tests to ensure it does not undermine the City Centre or isn't something that could reasonably be accommodated in the Primary Shopping Area (PSA). It is agreed that linkages are important.
Retail and leisure offer	Need to encourage a wider mix of shops, for example quality independent shops rather than chain or bargain shops. Improve night-time offer which is currently lacking. Encourage more outdoor events to bring people to the city. Need a central theatre to rival the Everyman in Cheltenham. Should be a drive to increase a greater variety of outlets in the 'gate' streets as well as Gloucester Quays.	These issues are identified as weaknesses in the SWOT analysis of the City Centre and are addressed in the draft 'Objectives' and 'Strategy for the City Centre'.

Objectives	General support for the objectives.	Support noted
<p>Objective 3</p> <p>To draw on Gloucester's strengths as an historic city to create a hub for culture, tourism and leisure.</p>	<p>Suggest should read '...to draw on Gloucester's strengths as an historic city, make better use of historic buildings, to create...'</p>	<p>This objective will be met through a range of activities, including the reuse of historic buildings, new builds, festivals, initiatives and so on. It is important therefore this statement remains more generic in nature.</p> <p><i>However, it is appropriate the reuse of historic buildings is amplified further and an additional bullet will therefore be added to the Strategy section to reflect this.</i></p>
<p>Objective 5</p> <p>To deliver a sustainable mix of complementary city centre uses which ensure vibrancy throughout the day and evening.</p>	<p>Could add '...based upon a significantly increased local residence presence.'</p>	<p>This is already adequately addressed at the Strategy section.</p>
<p>Objective 6</p> <p>To improve linkages within the city centre, encouraging the use of sustainable modes of transport whilst providing well located car parking.</p>	<p>This should be more specific and state that we want people to walk, cycle and use public transport rather than cars and include the canal and river as potential transport options.</p>	<p>The objective already refers to encouraging sustainable modes of transport, therefore no change required.</p>
<p>SWOT analysis</p>	<p>General support for the contents of the SWOT analysis – particularly a lack of cultural facilities, poor quality bus station and lack of connectivity.</p>	<p>Support noted.</p>

<p>SWOT analysis – strengths</p>	<p>Disagree that ‘The City Centre and its residential areas do not have any issues with the availability of community facilities’. Existing facilities are Council owned and so not meet the needs of Gloucester’s most disadvantaged areas. Question whether this should be included as a strength.</p>	<p>An audit of community facilities in April 2013 showed Westgate ward to have 22 facilities that were open to everyone in the community to use. The recognised calculation for assessing the provision of community facilities is 0.44 facilities per 1000 population. This figure is considered best practice and has been used by other local authorities. It is originally sourced from “Shaping Neighbourhood: Health, Sustainability, Vitality” Guise, Barton & Grant (2002).</p> <p>Using this calculation demonstrates that Westgate has 3.3 facilities per 1000 heads of population, way above the recommended 0.44. In comparison, Quedgeley Severnvale has no facilities. Westgate has a range of facility types including education venues, halls associated with places of worship, social and sports clubs and cultural facilities.</p> <p>In terms of the ownership of the community facilities, only 5 of the 22 facilities are owned by the city council.”</p> <p>It is therefore considered that the availability of community facilities in Westgate ward should be considered a strength.</p>
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SWOT analysis - weaknesses	Agreed with connectivity as an issue, suggest it should also include Westgate Leisure Park and Archdeacon Meadow. This should also be included as an opportunity.	<i>Agree. Amended accordingly.</i>
SWOT analysis – threats	<p>Increasing momentum of Gloucester Quays will create an even greater imbalance with the city centre.</p> <p>A great threat is the lack of local residents and this should be embraced in a clearly stated strategic objective.</p>	<p>Noted. The impact on Gloucester Quays on the City Centre was tested at the time the planning application was considered and was found to be unacceptable. If further proposals at Gloucester Quays were submitted to the local planning authority they would be assessed in the same way, to ensure that they wouldn't have a significant adverse impact on the City Centre</p> <p>Equally, through City Plan a number of key regeneration sites in the City Centre will be allocated for appropriate uses, including for example King's Quarter, which will help to provide more of a balanced provision.</p> <p>Disagree. This issue is addressed as part of a more generic objective related to mix of uses and vibrancy and more clearly defined in the Strategy section of document with respect to promoting urban living.</p>

<p>Primary Shopping Area (PSA), Primary and Secondary Shopping Frontages</p>	<p>General support for the identified areas, which have been expanded to include the King's Quarter area. Suggestion that the proposals map should identify 'frontages' rather than 'zones'.</p> <p>Objection to the inclusion of all secondary frontage in the PSA, which is contrary to the NPPF.</p>	<p>Support noted.</p> <p><i>Agreed – the plan will be amended to identify frontages.</i></p> <p><i>The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p>
<p>City Centre boundary</p>	<p>Mix of responses, some saying the City Centre boundary as drawn is too large, some agreeing with its proposed extent.</p> <p>Suggest city centre could be zoned into areas with similar uses e.g. historic centre.</p> <p>Objection to the city centre not including Gloucester Park which is considered an integral part of the City Centre.</p>	<p><i>Noted. The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p> <p><i>This is an option to consider, however, at present the City Centre is not considered big enough to identify meaningful 'zones'.</i></p> <p><i>Noted. The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p>

Residential development in the City Centre	Support policy that supports residential development in the City Centre, which will help to support vitality and viability. Important to ensure development is appropriate for both older and younger people, is of high quality design, appropriate to the area (design) and makes appropriate / timely contributions to investment in infrastructure.	<p><i>Support for city centre policies which encourage a mix of uses including urban living is noted.</i></p> <p><i>The City Centre Strategy sets out broad principles and this will be fleshed out with additional development management policies, which seek to address planning matters including type, tenure, design and delivery of infrastructure.</i></p>
Sequential test / impact test	Strong support for the proposed policy wording, requiring the assessment of proposals for retail development proposals not in the city centre against the sequential test and impact test. Helps to support the PSA and ensure the most is made of public transport services. Suggestion out-of-centre retail is not too much of an issue if there are good public transport facilities.	Support noted.

<p>Heritage</p>	<p>More should be done to make the most of heritage, which is currently under-utilised.</p> <p>There is a need for more tourism infrastructure e.g. hotels, coach parking, car parking.</p> <p>Strategy bullet 11, need more explanatory signage and interpretation.</p>	<p><i>Noted. Agree that the reuse of historic buildings be amplified further with an additional bullet being added to the Strategy section to reflect this. In addition there will be development management policies which will set out the Council's approach to, amongst other things, historic buildings and the historic environment.</i></p> <p><i>Noted. Most of these issues are identified in the SWOT and broad principles around these issues are set out in the City Centre Strategy and will be explored further as part of specific allocation and/or development management policies. However, there is a lack of reference in the Strategy to the role of parking and additional reference will therefore be made.</i></p> <p><i>A tourism strategy is also being prepared by the Council which will inform the preparation of the City Plan.</i></p> <p>Noted.</p>
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Connectivity	<p>Improve connectivity between the Docks and the City Centre.</p> <p>Improve connectivity with the mainline railway.</p>	<p><i>Noted. This is adequately addressed as part of the City Centre Strategy. However, it is also considered appropriate this is identified as an opportunity in the SWOT.</i></p> <p>Noted. This is not something that can be influenced by the City Plan. However, the Council continues to work with the County Council, Network Rail and other organisations on matters such as these.</p>
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City Centre sites

	Site / Issue	Representation	Response
General comments	Potential site allocations	More evidence will be required to demonstrate the impact of the proposed sites on the Strategic Road Network. This should be undertaken as part of the plan-making process. All sites will be required to provide safe and suitable access for all users and mitigate	Noted. This evidence will be provided as part of the emerging City Plan process.
WN1: Land fronting St Oswald's Road		No comments.	No comment.
WN2: Greater Blackfriars, incorporating The Fleece Hotel, Surface Car Park East, Surface Car Park West, County Council/The Quay, Gloucester Prison	<p>Support for the continued allocation.</p> <p>Protect viability and vitality of City Centre</p> <p>Concern over phasing.</p> <p>Concern over flooding</p>	<p>Strong support for the continued allocation of the Greater Blackfriars area. Mixed-use allocation to include a range of main town centre uses.</p> <p>Important that the development of this site does not undermine the vitality and viability of the Primary Shopping Area – complement rather than compete.</p> <p>Concern expressed regarding the phasing of the site as different elements will coming forward for development at different times to each other.</p> <p>Concern regarding location of site within the floodplain. The flood defences of The Quay (not recognised by the Environment Agency as formal defences) are at the previously predicted level of 1/100 year flood and need to be raised to the currently predicted level.</p>	<p>Support noted.</p> <p>Noted.</p> <p>Noted. This will be addressed through the emerging site allocation policy for Greater Blackfriars.</p> <p>Noted. This will be investigated and addressed through the emerging site allocation policy for Greater Blackfriars.</p>

WN3: 104 Northgate Street	Do not allocate	Suggest this site should not be allocated – doubts over deliverability and likely to be unviable.	The site has been identified as deliverable within the plan period through the Strategic Assessment of Land Availability (SALA).
WN4: King's Quarter / Bus Station and Market Parade	Support commitment to site. Mix of uses	Strong support for the Council's commitment to King's Quarter. Maintain allocation for retail-led regeneration. Suggest reference to the bus station should be amended to read, 'The redevelopment of the King's Square and bus station area would lead to the creation of a significant amount of new retail floorspace and other town centre uses that would have a positive impact on the vitality and viability of the City Centre. It would also, amongst other positive effects, lead to the creation of a modern bus station facility and the regeneration of a significant brownfield site in the heart of the City Centre.' Suggestion that other uses should be considered, for example relocation of Gloucester library, a new Tourist Information Centre, theatre, residential.	Support noted. Noted. This is the same as the existing wording. Noted. The King's Quarter site area has been identified as a retail-led regeneration area, incorporating a range of uses appropriate to its City Centre location. The exact uses provided within a scheme will depend upon commercial viability.
WN5: Car Parks, Hampden Way		No comments	No comment.
WN6: Gloucester Docks, incorporating	Support Make more of Docks/Quays as a	General support for proposed uses.	Noted.

<p>Land adjacent to Dry Dock, West Quay, Land adjacent to Llanthony Warehouse, Southgate Moorings</p>	<p>leisure/heritage destination Southgate Moorings</p>	<p>Important that the development of this site does not undermine the vitality and viability of the Primary Shopping Area – complement rather than compete.</p> <p>Make more of the Docks / Quays as an evening / leisure / dining destination and the waterside location / heritage / water-based industries.</p> <p>Suggest deal with Southgate Moorings as a separate development opportunity.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Given the relationship between the different sites in terms of location and constraints it is considered appropriate they are addressed on a comprehensive basis.</p>
<p>WN7: Land at corner of Southgate Street/Trier Way</p>		<p>No comments.</p>	<p>No comment</p>

Kingsholm and Wotton

Site	Site / Issue	Representation	Response
<p>KW1: Civil Service Sports Club</p>	<p>Evidence Base- Playing Pitch Strategy Transport Sand and Gravel</p>	<p>Both support and objection to the proposed allocation of this site. The developer supports on the basis the site is considered suitable for residential development, whereas Sport England and Active Gloucestershire object on the basis that it would have a detrimental effect on sport and physical activity in the City.</p> <p>Suggestion that allocation should be more flexible to allow for a wider range of sports uses.</p> <p>Evidence will be required to support the proposed allocation from a highways perspective given development has the potential to generate a significant number of trips.</p> <p>Assessment of the extent and economic viability of potential sand and gravel resources required.</p>	<p>Noted. The Council is in the process of preparing a Playing Pitch Strategy that will inform the position taken in City Plan in relation to this site.</p> <p>See above comment.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Noted. This issue will be discussed further with the County Council.</p>
<p>KW2: Hare Land North Car Park</p>		<p>No comments.</p>	<p>No comment.</p>

KW3: Industrial Units, Alvin Street	Gloucestershire Archives	Consideration must be given to the impact of any proposals in the adjacent Gloucestershire Archives facility.	Noted.
	Sand and Gravel Resource	Assessment of the extent and economic viability of potential sand and gravel resources required.	Noted.
KW4: 67 – 69 London Road		No comments.	No comment.
KW5: Wessex House		No comments.	No comment.
KW6: Former Telecom House site	Use of Site	Support for allocation. Consideration should be given to the development of this site for use for long-stay car parking for the adjacent train station. Consideration should also be given to the creation of access directly onto Platform 4 to improve linkages with the wider area.	Noted.
	Sand and Gravel Resource	Assessment of the extent and economic viability of potential sand and gravel resources required.	Noted. This issue will be discussed further with the County Council.
KW7: Warehouse GWR	Plan Evidence	Evidence will be required to support the proposed allocation from a highways perspective given development has the potential to generate a significant number of trips.	Noted. This evidence will be provided as part of the emerging City Plan process.
KW8: Great Western Road	Plan Policies - Level Crossing	Support allocation.	Noted.

sidings		<p>Consideration needs to be given to safety at level crossings – the impact from a development can result in a significant increase in vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. Suggest that the potential impacts from a development that affect Network Rail's level crossings is specifically addressed through planning policy as there have been instances where Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing.</p>	<p><i>Noted. This issue will be considered at the policy drafting stage.</i></p>
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Matson and Robinswood

Site	Site / Issue	Representation	Response
MR1: Land at Corncroft Lane	City Plan Evidence JCS strategic allocation	<p>Mix of responses supporting and objecting to the allocation of this greenfield site.</p> <p>Concern that any impacts of the proposal are thoroughly considered, including impact on Strategic Road Network, local accident hotspots, biodiversity and Key Wildlife sites.</p> <p>Suggestion that the site should be considered through the Joint Core Strategy given its relationship with possible strategic allocations.</p>	<p>Noted.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Given the size and indicative numbers in the SALA, it is not considered appropriate that this site is considered through the Joint Core Strategy.</p>
MR2: Winnycroft Farm	City Plan Evidence JCS strategic allocation	<p>Mix of responses supporting and objecting to the allocation of this greenfield site.</p> <p>Concern that any impacts of the proposal are thoroughly considered, including impact on Strategic Road Network, local accident hotspots, biodiversity and Key Wildlife sites.</p> <p>Suggestion that the site should be considered through the Joint Core Strategy given its relationship with possible strategic allocations.</p>	<p>Noted.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Given the size and indicative numbers in the SALA, it is not considered appropriate that this site is considered through the Joint Core Strategy.</p>

Abbey

	Issue	Representation	Response
A1 – Land adjacent to Abbeydale District Centre	Wildlife and biodiversity	This area is overgrown and an existing refuge for wildlife	Part of this site lies within flood zones 2/3 Subject to planning permission 15/0062/MOD/ 12/00868/MOD for variation of Section 52 Legal Agreement under planning permission 10727/01/OUT to remove the restriction that allocates the site for a library/police station and use of land for community purposes. The application was approved with a covenant that the site be gifted to community uses.
	Parking for the Hadwen Medical Centre	Discussion is ongoing with regard to parking for the Hadwen Medical Centre. Parking on the road outside the surgery is not safe with regard to large vehicle access to Morrisons.	Noted.
A2 - Land the Wheatridge	General lack of POS in the area	<p>The Abbey area already has a lack of open space as identified in the Council's own documents, this is one of the last open spaces that is peaceful and tranquil and is much appreciated by the local community.</p> <p>The sites should be retained for open space and children's play.</p> <p>The area is well used for walking, dog exercising and wild fruit picking. The area also has a bridle way running through it.</p> <p>The site could be opened up as a Farm Park which local residents could be involved in running.</p> <p>This informal open space provides opportunities for the community to meet socially.</p>	<p>The site is being promoted by the County Council as a development opportunity which is surplus to their requirements.</p> <p>This area is not formally adopted open space. It is private land owned by the County Council that is accessed informally by the local community.</p> <p>Development at the site could ensure some open space is retained and adopted by the City Council for retention in perpetuity in consultation with the local community.</p>

A2 - Land the Wheatridge	Wildlife and biodiversity	<p>The site provides a nature corridor for foxes and small mammals & is a hunting ground for birds of prey.</p> <p>Other species sited include badgers, hedgehogs, voles, field mice, red legged partridge, pheasants, goldfinches, bees, bats, newts and squirrels.</p> <p>Use for housing would lose habitat for urban wildlife.</p> <p>There are natural hedgerows and an abundance of flowers and wild fruit and elderflower bushes at the site.</p> <p>The site should be retained and developed/improved as a wildlife haven. The Woodland Trust could be involved to plant up the area. A wildflower meadow could be created.</p>	The independently prepared biodiversity evidence base for the City Plan will assess the importance of the site for biodiversity purposes.
A2 - Land the Wheatridge	Traffic congestion	<p>The Wheatridge East is the main thoroughfare to Upton –St –Leonards and can be very congested, any further development off this road will make matters even worse.</p> <p>People park on Wheatridge East for the Hadwen Medical practice on the Wheatway.</p> <p>Development of this site will result in more road accidents. The junction of Wheatridge East and Wheatway is already a difficult junction.</p>	Noted. The City Plan transport evidence will identify any mitigation required in order to accommodate development at the site.
A2 - Land the Wheatridge	Community Facilities	<p>The local pub is soon to be replaced by a service station and the existing doctors surgery is oversubscribed.</p> <p>Additional new housing at Brockworth has placed pressure on the existing community facilities at Abbeydale such that the area cannot take any more new housing development.</p>	<p>Strategic healthcare planning in the City is provided for by Gloucester Clinical Commissioning Group who will be consulted on future drafts of the City Plan.</p> <p>City Plan growth will need to be supported by the necessary infrastructure.</p>

A2 - Land the Wheatridge	Type of proposed development	<p>Three storey development would be inappropriate in this location as it would have an adverse impact on existing residents amenity.</p> <p>Any development should be limited to a small number of executive homes with as much of the field retained as possible.</p>	Any new development will need to make the best use of land in accordance with JCS and City Plan policy however normal development control criteria would apply with regard to the protection of existing residential amenity.
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Barnwood

	Issue	Representation	Response
B1 – Land north of Walls	Potential impact on Strategic Road Network	<p>The allocation has the potential to generate significant numbers of trips. Further evidence is required on the impact of this development on the Strategic Road Network, particularly roundabouts on the A40(T) to the north of the City and mitigation that maybe required. Such information should be incorporated into subsequent stages of City Plan preparation.</p> <p>Objection to the site being identified solely for employment use but should be for a mixed use of non-food retail/leisure and associated uses.</p> <p>The site should be bought forward in accordance with with paragraphs 22, 154 & 173-175 of the NPPF. Land should not be safeguarded for employment purposes if proposals for sites are not realistic. Despite marketing no responses have been received indicating interest in either developing or occupying the site for employment purposes. The only interest has come from car showrooms, food and drink operators, bulky goods retailers, a food retailer and a cash & carry/discount warehouse.</p> <p>A higher value use on the site is required in order to make an employment scheme viable owing to the costs of the highway improvements required & the cost of relocating the Unilever car park.</p>	<p>Transport evidence- which will include modeling of proposed City Plan sites – on the updated 2013 County Highways Saturn model – will inform part of the City Plan evidence base going forward and will address the issues raised by this representation.</p> <p>Highways Agency (now Highways England) and Highway Authority will be party to preparation of the tender brief for the Transport Assessment.</p> <p>An outline planning application for ‘B’ uses at the site is currently under consideration by the City Council (March 2015) demonstrating that the use of the site for employment purposes is deliverable.</p>

	Presence of watercourses	Watercourses are not a threat in themselves – they can be an important natural resource. This matter requires a more explicit response – that these particular watercourses can at times pose a flooding threat to the built environment.	<i>Amend references to watercourses at this site.</i>
B2 – Fire Station Eastern Avenue	Update on site	Gloucestershire Constabulary acquired the freehold interest in this site in October 2012 and plans to redevelop it to provide a new police station to service Gloucester City Centre and replace the existing Bearland Police Station which will be closed once the new facility at Eastern Avenue is operative. The new police station at Eastern Avenue will be the base for community policing and response for Gloucester. The existing custody function at Bearland will be relocated to a new facility at Waterwells so there will not be any custody function at Eastern Avenue.	The new custody suite at Waterwells is now operational. The City Council is working closely with the police to ensure a retained presence in the City Centre and to ensure an end use for the former fire station site that will retain the site in an employment use.
B3 – Royal Mail Distribution Centre Eastern Avenue	Greater flexibility of use	<p>The City Council is encouraged to build in greater flexibility for employment generating non B class uses to be developed on employment sites, in line with the “whole economy” approach advocated in para 7.11 of the NLP March 2011 report and paragraphs 21 & 22 of NPPF 2012.</p> <p>The emphasis should be on maximizing the use of brown field land within the existing urban area before considering the release of green field land.</p> <p>While it is appropriate to apply the sequential and impact tests in considering proposals for new retail development outside the Primary Shopping Area occupational demand from retailers may not always be in the City Centre and the City may therefore lose valuable investment that would make an exceptional contribution to the image and regeneration of the City if it does not apply the city centre first principle in a more flexible manner.</p> <p>The site is known as <i>Gloucester Mail Centre</i> not</p>	<p>Noted</p> <p>Noted.</p> <p>Noted. The sequential test is flexible in that it allows applicants to demonstrate special circumstances where particular form of retail development would not be applicable in a City/Town Centre locations.</p>

		<p><i>Royal Mail Distribution Centre.</i></p> <p>Correct site area is 2.25ha.</p> <p>Royal Mail consider the character of the area should be described as <i>mixed use</i> not <i>employment</i>.</p> <p>Royal mail request reference to possible contamination at the site be deleted.</p> <p>Reference to capacity of Walls and C&G roundabouts should be deleted.</p> <p>The existing access to the north bound carriageway of a the A38 is a constraint and should be added.</p> <p>Proposed use should read, '<i>Existing employment land to be retained for employment purposes. Uses that make an exceptional contribution to the image and regeneration of Gloucester will also be considered</i>'.</p> <p>Site should be described as, '<i>Prominent 'gateway' location with good communication links, offering a high quality development opportunity</i>'.</p>	<p><i>Noted – amend as suggested</i></p> <p><i>Noted – amend as suggested</i></p> <p>Eastern Avenue currently provides and will continue to provide an employment focus for the City. All brown field sites may be subject to possible contamination.</p> <p>City Plan Transport evidence will identify existing junctions currently operating at capacity.</p> <p>City Plan Transport evidence will identify site specific constraints and mitigation.</p> <p>Site will continue to be considered for employment purposes in City Plan.</p> <p><i>Agree amend however state it is an employment related development opportunity.</i></p>
Barnwood Point sites	Other representations with regard to Barnwood	Request that sites be considered for allocation through the City Plan process	Potential City Plan sites have been ascertained through the SALA process – these sites have not been submitted to the SALA – however they have been picked up going forward in response to the 2013 City Plan consultation (March 2015).

Barton and Tredworth

Site	Issue	Representation	Response
	Minerals and Waste	The British Geological Survey resources map suggests sand and gravel resources underlying the site (BT1 and others in other wards). The extent and economic viability of these resources should be assessed. Care consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals.	Noted. This issue will be discussed further with the County Council.
City Farm	Make more of the City Farm	More could be made of the City Farm area to attract visitors to Barton and Tredworth	The City Farm is leased to the Friendship Café community group who successfully run the farm and offer a range of activities and experiences for local people. This is outside the scope of City Plan.

Elmbridge

Site	Issue	Representation	Response
<p>Site E2 Helipebs</p>	<p>Suitability of site E2 Helipebs</p> <p>City wide issue</p>	<p>This site is identified as an occupied and functioning industrial area. There are also a number of identified constraints, including potential contamination issues. The cumulative impact of these considerations has a significant limiting effect on the potential for redevelopment. In particular, the fact that the site is a functioning industrial area implies that there are current occupiers who are likely to have varying lease agreements and structures. Complex sites, such as this, should not be allocated for development unless there is clear evidence that the site will become available with the plan period.</p> <p>City needs to allocate prime residential locations capable of delivering larger family housing, and not place undue reliance on the delivery of apartment based developments to meet the housing requirement.</p>	<p>The site was submitted to the council as part of the SHLAA process indicating its availability. The site has been thoroughly assessed by officers and is considered suitable, available and achievable within the plan period.</p> <p>The city council is committed to delivering housing to meet its identified housing need. The redevelopment of suitable sites plays an important role in delivering a mix of housing types including family housing.</p>
<p>Site E2 Helipebs</p>	<p>Impact on highway network</p>	<p>Site E2 Development at any of the listed sites will be required to provide safe and suitable access for all users and mitigate any severe impact the development causes in line with the NPPF. In particular the site causes concerns over access to the highway network.</p>	<p>The potential impact on the highway network will be assessed through further evidence gathering as part of the City Plan process. Any planning applications submitted on the site will be required to submit evidence to demonstrate the impact on the highway network, and details of any mitigation as appropriate.</p>

Longlevens

Site	Issue	Representation	Response
L1 Bishops College Site	Relationship between JCS allocations and City Plan allocations	The Plan needs to make linkages between allocations on the edge of the City and strategic allocations in the JCS eg L1 and G1 and G9.	Comment noted
L1 Bishops College Site	Transport	The Highways Agency (now Highways England) supports the site's location close to the City Centre, however, further evidence needs to be provided to establish the traffic impact of the proposal on the SRN, particularly the roundabouts on the A40(T) to the north of the City	Further evidence is being progressed to meet the requirements of the PPG in partnership with the Highway Authority and the Highways Agency (now Highways England).
L1 Bishops College Site L2 – Land off Leven Close.	Protection of Playing Fields	Ensure the Playing Pitch Strategy is kept up to date and meets the requirements of the NPPF. Object to the loss of playing fields and pitches and therefore seek the removal of the site allocation. The site does not meet the exceptions test.	An updated Playing Pitch Strategy is being prepared and will inform the City Plan and its policy approach in relation to playing fields.
L1 Bishops College Site		Seek protection of the site for educational purposes, particularly given the expected development to the north of the area. Agree with the SHLAA's conclusions that potential for residential development is limited. Concern over access into the site and the narrowness of Estcourt Road with no alternative available.	The site is surplus to the operational requirements of the County Council and has been approved for disposal. The site is being considered for residential development. A satisfactory access will need to be provided to the satisfaction of the Highways Authority.
L1 Bishops College Site L2 – Land off Leven Close.	Sand and Gravel Resources	The British Geological Survey resource maps suggest sand and gravel resources underlying the sites. The extent and economic viability of these resources should be assessed. Careful consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals. Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD.	<i>Noted. This issue will be discussed further with the County Council.</i>

Quedgeley Severn Vale

Site	Issue	Representation	Response
QSV1 – Clearwater Drive	Nature Conservation	<p>The approach (one of a number considered by GCC in the past) of partial development of QSV1 that ensures nature conservation assets are managed and enhanced long-term can be accepted from a biodiversity perspective on this County Council owned site. It should be mentioned in the table that this site is designated as a Key Wildlife Site by the Gloucestershire Wildlife Sites Partnership (i.e. The Causeway, Quedgeley KWS). Further details on this site’s value can be obtained from the Gloucestershire Centre for Environmental Records (www.gcer.co.uk/) and this together with an ecological survey and assessment will be needed to inform any detailed development proposals that might come forward for QSV1 at the planning application stage.</p>	<p>An independently prepared biodiversity evidence base will inform City plan preparation.</p>
QF1 – Land east of Waterwells	Proposed employment allocation	<p>The infrastructure required in order to bring the proposed employment allocation forward affects the financial viability of the scheme. Therefore the Council is urged to allocated 20 acres (approx) for residential purposes to enhance the area. The area is likely to become more sustainable with the completion of the ‘Kingsway’ and ‘Hunts Grove’ developments – additional residential development would be the most viable use in this area.</p> <p>Support for Option 3.</p> <p>Lynton Fields is available for commercial/residential development purposes.</p> <p>The Highways Agency (now Highways England) is not satisfied that this is the most sustainable location in transport terms for further intensification of employment development, especially in the absence of any certainty relating to the provision of a rail station or frequent bus services. Before it can support this allocation the Agency will require evidence to be submitted which explains;</p> <ul style="list-style-type: none"> - The transport impact of this allocation and in particular the additional traffic which would use Junction 12 of the M5 and; - The mitigation required to accompany the development. 	<p><i>Comments noted.</i></p> <p><i>Land East of Waterwells forms the last phase of the successful strategic Waterwells employment allocation. An element of residential is considered appropriate to deliver road infrastructure improvements to open up the remaining employment land and address the concerns of those living in the area. A comprehensive approach is required to delivering the site.</i></p> <p><i>Further transport evidence will be gathered to inform site allocations within the Plan.</i></p>

		<p>The proposed employment site is not easily or conveniently accessed from the Strategic Road Network and is relatively isolated from the rest of the business park.</p> <p>It would seem more appropriate for the site to be used for residential development will all necessary community services and facilities to serve future residents currently being provided and becoming available in the area.</p>	
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Tuffley

Site	Issue	Representation	Response
Land South of Grange Road (T1)	Loss of landscape value	The last County Structure Plan (2000) depicted this land as falling into the two important landscape policies supported by the Government and the then Countryside Commission. T1 borders the A4173 from the Gloucester city boundary to Stroud and is considered to be the best (landscape) road entry into the City and to and from Stroud. The latter combined with Gloucester city Country Park Robinswood Hill (an outlier of the Cotswolds) the Cotswolds scarp itself, the Severn Vale, the winding River Severn, Painswick Village, May Hill, Forest of Dean, Harsefield Hill the Malvern Hills has always given the driver and passengers, in fantastic detail, one of the finest pleasure routes in the UK.	The City Council commissioned a Landscape Analysis Report which highlights that the southern part of the site is not suitable for development due to landscape constraints. The report also suggests mitigation to reduce any visual impact on the surrounding landscape should the northern part of the site come forward for development.
Land South of Grange Road (T1)	Flooding	The development of T1 will create hard surfaces. The fields already contribute flooding beyond Grange Road.	As part of the City Plan further work will be undertaken to assess the flood risk and any implications that may or may not have on the development potential of this and other sites. Any planning application for the development of the site would need to demonstrate how surface water will be managed. This work would need to satisfy the requirements of the Environment Agency and Severn Trent.

Land South of Grange Road (T1)	Highways	Already congested by commuters by car and by public transport including schools, homes for the elderly and the like.	As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan.
Land South of Grange Road (T1)	Loss of agricultural land and rural character	The fields in T1 are normally full of cattle and sheep on good agricultural land with public footways styles and are linked to a circular walk all around the City of Gloucester linking it with its best outdoor features and landscape including Robinswood Hill and the River. The countryside here is truly rural and should remain as such. It has become a major asset for the City tourists and economy.	The Landscape Analysis Report November 2013 assessed the quality of the landscape in the area. The findings of this work suggest that development to the south of the site would not be suitable and development to the north would need mitigation measures implemented to reduce any negative impacts on the surrounding landscape. The City Council must consider all sites that have a potential for residential, regardless of their previous use, given the need for housing that is presenting.
	Retail	Develop small shopping areas for the older generation – but maintain them. Windsor Drive (local centre) is an absolute disgrace.	Local centres are an important element of sustainable communities. The City Plan will seek to protect local centres and support their regeneration should appropriate planning applications come forward.
	Concern over loss of greenfield	Stop the development of green fields at the end of Grange Road	The housing requirements for the City are such that not all of the housing can be accommodated on brown field development.

Land South of Grange Road (T1)	Site T1 should be considered through the Joint Core Strategy (JCS)	It is noted that some sites adjacent or close to the city boundary have a relationship with possible strategic allocations. In particular sites MR1, MR2 and T1 all fall within JCS broad location site G6 (the remainder of which is predominantly located within Stroud local authority area). These sites should be considered through the JCS process, particularly where their rural boundaries are not defined by a hard feature such as the M5 motorway as is the case at the southern boundary of MR2 and at the long south-east boundary of T1.	The districts within the JCS have signed up to a memorandum of understanding and have agreed to pursue a number of strategic sites. This site is not considered a strategic site as part of the JCS. The districts have agreed that the most sustainable direction for growth should be to the north of Gloucester to better link, and take advantage of services and employment opportunities in the existing centre.
Land South of Grange Road (T1)	Strategic Highways	Site T1 – These (along with MR1 and MR2) are the largest potential allocations in the City Plan (in terms of hectares) and they are all on greenfield (and in fact Green Belt) land on the southern edge of the city. Each of the sites has the potential to give rise to a significant number of trips. However, it is not clear at this stage how, or if, trip generation from them will affect the SRN as these sites are some distance from the A40(T) or M5 motorway junctions by existing roads. The local authority will need to provide evidence which explains the traffic impact of these sites and the mitigation which may be required at them. This information should then be incorporated into subsequent stages of the City Plan production.	The comment is inaccurate in that the site is not located within green belt. As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan
Land South of Grange Road (T1)	Promotion of site T1 for development	Site T1 represents a highly appropriate and sustainable location for future development to meet the needs of the City. For the reasons set out in these representations we consider the land south of Grange Road is a suitable, sustainable and deliverable site. There are no constraints precluding the site from coming forward for much needed family housing in the early years of the City Plan. – An illustrative masterplan for the development of 200 homes is included in the plan.	Noted. The City Council will undertake further evidence gathering as part of the development of the City Plan. This work may or may not highlight further development constraints.

<p>Land South of Grange Road (T1)</p>	<p>Opposed to development of T1</p>	<p>Access limited - Grange Road too narrow and Stroud Road already busy Too many houses in a small area Flooding likely Shortage of Facilities Loss of agricultural land – needed more as population expands</p>	<p>As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan</p> <p>As part of the City Plan further work will be undertaken to assess the flood risk and any implications that may or may not have on the development potential of this and other sites.</p> <p>Any planning application for the development of the site would need to demonstrate how surface water will be managed. This work would need to satisfy the requirements of the Environment Agency and Severn Trent.</p> <p>The City Council must consider all sites that have a potential for residential, regardless of their previous use, given the need for housing that is presenting.</p>
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Westgate South

Site	Issue	Representation	Response
<p>City Plan Consultation document</p>	<p>Object to wording in introduction to Hempsted</p>	<p>Object to the last sentence of the first paragraph on page 84 of the CPCD which states that Hempsted now forms part of the wider built up area of the City. Seeks this wording to be replaced by wording from the 2007 Conservation Area Appraisal to be included as follows..'<i>Despite this, Hempsted preserves its separate identity as a village on the south western side of the City.</i>'</p> <p>The third paragraph should state that <i>"crucial to that environment are the agricultural fields to the east and west of Hempsted Lane which preserve the sense of separation from Gloucester and maintain the green and rural character of the village. They are also critically important to the setting of the conservation area."</i></p>	<p>Hempsted forms part of the administrative area of the City of Gloucester.</p> <p>These comments are too site specific to be included within a general SWOT for Hempsted. The SWOT already refers to the areas strengths as its setting within the landscape and its conservation area and character of the older part of the village.</p>
	<p>Object to SWOT wording in Ward analysis for Hempsted</p>	<p>Object to the analysis of the ward on page 85 of the CPCD. The environmental strengths are underplayed. The items under strengths should be deleted and be replaced with the following :</p> <p><i>The older part of the village has a rural character and identity which provides environmental benefits for the whole Hempsted area.</i></p> <p><i>Fields to the east and west of Hempsted Lane, which are still in agricultural use penetrate the built up area and are essential in preserving the rural character and identity of Hempsted and critically important to the setting of the conservation area.</i></p> <p><i>Fields to the east and west of Hempsted Lane contain features of historic and archaeological importance, including Lady's Well, various earth works, ridge and furrow and remnants of an old orchard. The Council's own interpretation board, along the footpath link from Hempsted Lane to The Gallops, highlights the importance of these and other features.</i></p> <p>Under threats the wording should be revised to say:</p> <p><i>Loss of village character through large scale development proposals</i> <i>Any development proposals in locations which are critically important to</i></p>	<p>These comments are too site specific to be included within a general SWOT for Hempsted. The SWOT already refers to the areas strengths as its setting within the landscape and its conservation area and character of the older part of the village plus states threats relate to loss of 'village' character through large scale development.</p> <p>Design policies will be included within the plan that cover some of the issues identified relating to character and views.</p>

		<p><i>the setting of the conservation area</i></p> <p><i>Any development proposals which would not –(i) help to preserve the sense of separation of the older part of Hempsted from Gloucester, (ii) maintain the green and rural character of the village, and (iii) protect important views.</i></p>	
Hempsted Village	General comments	<p>Hempsted is a village despite recent growth.</p> <p>Support the Council's analysis of the area</p> <p>Damage to community cohesion and loss of community.</p>	Comments noted.
	Sustainable Development	Further development would not be sustainable.	A Sustainability Appraisal is being prepared alongside the City plan which will inform its preparation and ensure delivery of a sustainable development plan.
	Infrastructure	<p>lack of infrastructure and services which would worsen with further development.</p> <p>capacity of school/sewerage system,</p>	Future development will need to ensure it meets necessary infrastructure requirements. An Infrastructure Development Plan will accompany the City Plan.
	Open Space	<p>Concern over loss of green space/amenity space,</p> <p>Protect open space and develop only brownfield sites and reuse empty homes</p>	Comment noted. An open space study and an updated Playing Pitch Strategy are being prepared which will help inform preparation of the City Plan.

	Traffic congestion	Road congestion. Hempsted Lane cannot absorb any increase in car trips, All roads in Hempsted will require widening if sites are developed. Congestion on the local road network especially around school times means there is no access for emergency vehicles.	A Transport Assessment- which will include modeling of proposed City Plan sites – on the updated 2013 County Highways Saturn model – will comprise part of the City Plan evidence base going forward and will address the issues raised by this representation.
	Natural Environment	impact on landscape and the natural environment, loss of views, Greenfield sites within and around the village form a protective green belt around the village.	The independently prepared biodiversity/landscape evidence base for the City Plan will assess the importance of identified sites for biodiversity purposes.
	Heritage	Development would change the character of the conservation area, and lead to much denser development.	The City Plan will seek to preserve the character of the conservation area whilst needing to meet identified development needs of the city.
WS9 – 26 Hempsted Lane	Support development of the site	Support development of brownfield site (for employment use)	Support noted
WS10 – Former Oil Storage Depot	Support development of the site	Support the limited development of this brownfield site. Needs to be proportionate, take full account of the environment and make proper and timely contributions to infrastructure. The development must not result in over development, open up Honeythorn Close to pedestrian/vehicular traffic, result in adverse impact of proposed developments on Hempsted Lane, Meet resulting infrastructure needs as a result of the development. The development must not impinge on views from the west	Site has outline planning permission granted in February 2015

WS10 – Former Oil Depot	Object to development	Lack of infrastructure for education and drainage make this an unacceptable development site. Separate from the village	Site has outline planning permission granted in February 2015
WS11 – South West Bypass	Support		Noted
WS11 – South West Bypass	Object to development of the site	Linear development which would block the view of the green space west of the bypass and create an overdeveloped feel. Separate from the village	Site supported by the SELLA panel as appropriate for employment use.
WS12 – Land East of Hempsted Lane	Object to development of the site	<p>Greenfield Site</p> <p>Development would destroy the rural village character which makes Hempsted an attractive place to live.</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Land under agriculture since the middle ages.</p> <p>Forms an important separation between the new development along the bypass and the old village of Hempsted and is essential to maintaining the green and rural character of Hempsted in visual and community terms plus contribute to the setting and character of the conservation area and archaeological importance for the area.</p> <p>Sites protected from development on environmental grounds – Landscape Conservation Area/Prime Biodiversity Area</p> <p>Dispute Council's open space study which states that there is a shortfall in open space provision in Hempsted</p> <p>Need to provide a quality environment for the residents of Gloucester and not develop valuable sites to offset use of Green Belt elsewhere.</p> <p>Outgrown hedge obscures view of Chosen Hill, Detrimental impact on the protected environment.</p> <p>Lack of infrastructure for education and foul and surface water drainage make this an unacceptable development site.</p>	WS12 now has Outline planning permission for residential development granted in December 2014

		<p>Hempsted Lane is unable to cope with additional traffic that would be generated from the development of this site.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p> <p>The sites position in the centre of Hempsted provides an outstanding presence on the whole area.</p> <p>The fields are integral part of the rural character of Hempsted, they form part of the open countryside, protect the archaeological importance for the area and medieval ridge and furrow field system and traditional orchard, are critically important to the setting of the Conservation Area, prevent the coalescence of the main urban area with the older historic part of Hempsted Village, protects important views across the site to Robinswood Hill and the Cotswolds, should be allocated as part of the Green Infrastructure system securing long term green areas.</p> <p>SHLAA assessment does not meet guidance requirements</p> <p>Issues with SA process</p> <p>Council ignored consultation responses which did not support development of the site</p> <p>Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Seek updated polices to protect fields.</p> <p>Designate site as a Local Green Space.</p>	
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<p>WS12 – Land East of Hempsted Lane</p>	<p>Support development of the site for residential /public open space</p>	<p>Support limited development with open space gains and improvements of access with the wider Hempsted area. Manor Farm and the house opposite retain their landmark nature. Support development of site for 50 – 60 houses and around 1.5ha of public open space.</p> <p>Prime biodiversity Area (PBA)– site would not impact on designated sites owing to their spatial relationship and lack of connectivity with the site. Through development parts of the site eg the remnant orchard could be restored and improved.</p> <p>Landscape Sensitivity – land has a rural use but in an urban context. Landscape quality is low with potential for enhancement through development</p> <p>Landscape Conservation Area policy (LCA1) is a non statutory policy and the inclusion of the site within the policy was recommended against by an independent Inspector.</p> <p>There will be no effect on the setting of designated assets. The setting of the historic part of the village will be maintained by retaining open land on this part of the site.</p> <p>The Conservation Area has not been extended to include land east of Hempsted Lane.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014</p>
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<p>WS13 Land at Rectory Lane</p>	<p>Object to development of the site</p>	<p>Greenfield site,</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Development would compromise the natural and undeveloped views from the valley floor to the west of the village, river basin and city approach</p> <p>Protection of the landscape character/urban fringe landscapes views should be preserved for their amenity value on the local network of rural paths</p> <p>Unsuitable development site due to access, size, position and instability of land resulting from development of Chartwell Close. Development would be imposing on property which sits below this site and impact on skyline when viewed from west. Also lack of infrastructure for education and drainage constraints apply. This flat area is built up of rubble which sits atop of the clay slope and was put there at the time Chartwell was built. Access problematic, illegal school parking a problem.</p> <p>Development here would have an adverse impact on the character of the village.</p> <p>There are likely biodiversity assets on the site which are in close proximity to the strategic green infrastructure of the River Severn and Wash Lands.</p> <p>Sites have poor access to public transport, services and facilities and there is a lack of capacity in the foul and surface drainage infrastructure and insufficient primary school capacity in the area.</p> <p>Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p>	<p>Comments noted</p> <p>Further evidence will be undertaken to inform potential city plan allocations.</p> <p>The site may be too small for allocation within the Plan.</p>
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<p>WS14 Land at Rea Lane</p>	<p>Object to development of the site</p>	<p>Greenfield site</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Development would compromise the natural and undeveloped views from the valley floor to the west of the village, river basin and city approach</p> <p>Protection of the landscape character/urban fringe landscapes</p> <p>Views should be preserved for their amenity value.</p> <p>on the local network of rural paths</p> <p>Unsuitable development site due to access on Rea Lane, ad hoc development next to Chartwell Close. Also Lack of infrastructure for education and drainage constraints apply</p> <p>Development here would have an adverse impact on the character of the village. There are likely biodiversity assets on the site which are in close proximity to the strategic green infrastructure of the River Severn and Wash Lands.</p> <p>Sites have poor access to public transport, services and facilities and there is a lack of capacity in the foul and surface drainage infrastructure and insufficient primary school capacity in the area. Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p> <p>The site has biodiversity interest. Disagree with the SHLAA comment that the hedge is species poor. The hedge supports a great deal of fauna and restoring this boundary would be quickly and easily achieved. The southern part of the site forms a new orchard. Buzzards nest in the area and kestrels feed. The western boundary includes mature trees including an oak and possible rare black poplar that need to be protected.</p>	<p>WSP Landscape Analysis of potential development sites 2013: the site is appropriate for development. The sites position is well screened from the flood plain and is bound to the north and east by residential properties.</p> <p>JCS Gloucester Landscape Sensitivity Area – High- Medium sensitivity</p> <p>SELAA – capacity should be reduced owing to the access constraints at this site.</p> <p>Adjacent to strategic GI of Severn and wash lands</p> <p>Archaeological constraints?</p> <p>Further evidence will be undertaken to inform potential city plan allocations.</p>
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Other Sites

Site	Issue	Representation	Response
Rear of cattle market and adjacent to Archdeacon Meadow – possible residential opportunity.	Additional site	possible residential opportunity	Noted. The site has an outline consent for mixed use development as part of the wider St Oswalds development site. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
<input type="checkbox"/> Former Kwiksave Site, Northgate Street	Additional site	Residential planning application exists but there has been no progress on development.	This site lies within the new Housing Zone where residential development is being encouraged. The site forms part of the SALA and its deliverability will be reviewed on a regular basis. Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
Baker's Quay site	Additional site	Mixed development opportunity to include residential, hotel etc.	Noted. Bakers Quay already benefits from outline planning permission. Notwithstanding this, consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan
Alney Island	Additional site	The H&G Canal Trust is currently driving the Llanthony hydro project (Green energy) and would be a leading partner in developing the Leadon Valley Green Infrastructure Project. With regard to this latter project Alney Island should be recognised as an integral part of it, and not as a separate entity.	Noted. Alney Island has been and will remain a key piece of strategic Green Infrastructure being progressed through the Joint Core Strategy. This will feed into the City Plan.

Canal	Additional site	Restoration of the Canal will bring significant benefits to the City and in the sustainability of its Plan. These will be in the areas of tourism, recreation, employment, health and wellbeing of residents through walking and cycling along the Canal, the provision of a substantial green corridor for wildlife, and in biodiversity, etc.. Make reference to the Canal under tourism, open spaces, sustainability, etc..	<i>Agree amend Plan to make reference to the Canal as stated.</i>
Land at Whaddon	Additional site	<p>The City Strategy should look beyond the administrative boundary to find the most sustainable and deliverable growth options for the city, and land at Whaddon should be included and assessed in this regard by both the City Council and Stroud District.</p> <p>Overall, constraints within the site are limited and the site is considered suitable and sustainable for development.</p> <p>The site has a strong physical and functional relationship with Gloucester City and represents a logical urban extension opportunity to the existing urban area. The site also has a strong physical functional relationship with wider Gloucestershire JCS administrative area and should be considered as a strategic opportunity for the wider housing market area in this regard.</p> <p>The site's location adjacent to the existing urban area provides good accessibility to Gloucester City's amenities, facilities and employment opportunities including the city centre by sustainable modes of transport.</p> <p>Land at Whaddon also benefits from ease of access to local bus services</p> <p>Land at Whaddon benefits from accessibility to the dedicated network of footpath and cycle routes</p> <p>The site is un-extraordinary in landscape terms</p> <p>A linear belt of floodplain bounds Daniels Brook through the centre of the site and can be easily accommodated within the development/masterplanning for the site.</p>	Site not required. Gloucester City Council is able to meet its needs within its boundaries and within the strategic allocations in the JCS

		<p>there are number of public footpaths within the site which can be accommodated within the development/masterplanning of the site.</p> <p>The evidence base clearly demonstrates that the growth needs of Gloucester City cannot be accommodated within the City boundaries and as such, sites within neighbouring authorities, including Stroud, will need to be allocated for development growth.</p> <p>As confirmed by the SHLAA assessment and by virtue of these representations, land at Whaddon is deliverable</p> <p>The City Plan Strategy Consultation has focused upon sites within its administrative boundary and has not assessed alternative delivery within Stroud District to serve local market needs. As Stroud DC sits outside the Gloucestershire JCS, cross boundary land to the south of Gloucester should be considered within the City Plan as well as the Stroud Local Plan.</p> <p>The suitability and sustainability of land at Whaddon is demonstrated by the City Council's identification of T1 in the City Plan Strategy Consultation. This is the northern proportion of the RSS Whaddon search area which is contained within the city boundary. Cross boundary working with Stroud District has not been undertaken here given that the suggested allocation stops at the City Council boundary.</p> <p>In this regard, land at Whaddon provides a more appropriate and sustainable growth location for Gloucester, which is better related to the City and inward investment than Hunts Grove.</p>	
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Land at Unilever B1	Change use	Support Barnwood as a development opportunity but not its suggested future use for employment only. Seek mixed use allocation including non food/leisure (and associated uses) as well as employment (B1, B2 and B8). The proposed use of the site is contrary to paragraphs 22, 154 and 173 of the NPPF, is not deliverable and not viable due to costs associated with achieving an acceptable access into the site, as well as utilities and car park relocation.	A planning application is being progressed for B uses on the site.
Peel Centre	Accessible out-of-centre location to accommodate new retail floorspace	The Peel Centre and adjacent sites should be prioritised as a very accessible out-of-centre location to accommodate new retail floorspace, as well as the reconfiguration / expansion / refurbishment / improvements as a retail warehouse location and the former Cineworld building. It should also be acknowledged that the Peel Centre has both D2 leisure and A3 restaurant uses.	Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
Madleaze Industrial Estate	Development opportunity	Madleaze Industrial Estate should be identified as a development opportunity – it is owned by the Peel Group who will be reviewing potential development opportunities in the early stages of the plan period.	Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.

Non Site Specific Issues

Issue	Representation	Response
Highways	<p>The Highways Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN). With respect to the city of Gloucester the SRN comprises:</p> <ul style="list-style-type: none"> - The M5 adjacent the city's eastern boundary; and - The A40 close to the city's northern boundary between Elmbridge Court Roundabout and Over Bridge <p>Nearly all of the authority area is within 3 miles of a junction on the SRN. The Highways Agency is a statutory consultee on stages of local plan preparation and it is the Agency's intention to work closely with the City Council at every stage of the City Plan.</p> <p>The City Plan introduction also notes that it is clear that the City will be unable to meet all of its growth needs within its own boundaries and that consequently there is a need for the City Council to work with neighbouring authorities to allocate land outside but adjacent to the city boundary.</p> <p>The Agency is aware that the authority boundary is drawn tightly around the city and that significant housing and employment development has already occurred close to, but outside, of the city boundary.</p> <p>The Agency supports the key components of the draft City Centre Strategy, particularly the 'city centre first' approach towards all proposals for main town centre uses, which has the potential to reduce trip distances, increase the proportion of trips by non-car modes and reduce reliance on the private car.</p> <p>The Agency supports the assessment of proposals for retail development outside the Primary Shopping Area against the key tests set out in the NPPF, in particular the sequential test by which local planning authorities must require applications for main town centre uses to be located in the town centres.</p> <p>The Agency broadly supports policies which seek to increase residential development in the city centre as it offers the potential to provide housing close to facilities and public transport and reduce household reliance on the car.</p>	<p>Comments noted.</p> <p>It is the intention of the City Council to continue to work closely with the Highways Agency now called Highways England.</p> <p>It is noted that further evidence is required and this is being progressed.</p>

	<p>Indicative acceptable numbers of dwellings were or amounts of floorspace anticipated on each proposed allocation were not provided in the ward-by-ward summaries and would have been helpful in facilitating the Agency's analysis of the potential generation.</p> <p>It is not clear at this stage what up-to-date transport evidence supports the City Plan. The Agency must make it clear that, without the benefit of having sight of up to date transport models which predict the impact of different development scenarios on the SRN; the Agent is unable to comment in detail about the acceptability of individual proposed allocations.</p> <p>The Agency will be pleased to work in partnership with the City Council and its neighbouring authorities to identify the appropriate sub-regional transport modelling to support the preparation of the City Plan and ensure it can be found sound by the planning inspector.</p>	
Highways	In particular, the following sites cause concerns over access to the highway network: B1, E2, KW5, KW6, KW7, KW8 (plus anything that puts extra traffic through St Barnabas Roundabout.	Further highways work will be undertaken to assess the likely impacts and potential for mitigation prior to any site allocations.
Public transport	Lack of bus services to St Oswalds or the Quays Shuttle bus required between Quays and City Centre.	Bus services in the City are run by private companies and are not subject to planning controls.
Brownfield Land	<p>Complex sites (brownfield) should not be allocated for development unless there is clear evidence that the site will become available with the plan period.</p> <p>Due to the nature of the environment within the Gloucester City Council administrative area, it comes as no surprise that the majority of potential site allocations within the City Plan are small, urban 'infill' developments. Whilst we do not object to the allocation of such sites where these are considered viable and deliverable, it is important that the Council allocate appropriate sites to meet the range of housing market needs, including sites capable of delivering larger family housing.</p> <p>It is our view that the Council should allocate a mix of sites capable of delivering both apartment based redevelopment schemes and larger sites capable of delivering family accommodation. For the former, all realistically deliverable and viable sites should be allocated however the Council should not rely unduly on such sites to meet the housing needs and demands of the area. In addition to these, the</p>	<p>All sites put forward are assessed thorough the SALA process. This includes assessing whether or not the sites are suitable, available and achievable. Sites that do not meet the criteria will not be put forward as allocations within the City Plan. A mix of sites is being progressed to meet a mix of needs.</p> <p>The JCS will agree the quantum of housing that Gloucester requires.</p>

	Council should identify the most sustainable and appropriate locations for family housing development within the City boundary, based upon a clear understanding of the quantum of such housing needed to meet local demand.	
Brownfield	<p>In general support the use of brown-field sites and the re-classification of buildings for residential use. But this is on the basis that all developments/re-classifications: are proportionate, taking fully into account needs/character of the surrounding area; are the subject of extensive community/stakeholder consultation; successful applications require proper/timely contributions to the necessary investments in infrastructure.</p> <p>Something needs to be done with the areas around the Quays and the Peel Centre when the cinema moves as there is a great deal of unused space, derelict buildings etc there. Greenfield sites should be protected whilst there are so many brownfield or other formerly used sites standing empty.</p>	<p>Comments noted.</p> <p>Matters of infrastructure provision are dealt with as part of the City Plan.</p> <p>The site is privately owned. The City Council will continue to assist, where appropriate, those private landowners who wish to develop their brownfield sites in accordance with national and local planning policies, to ensure suitable and sustainable development.</p>
Landscape	There is a specific need to address more fully the environmental issues including built heritage, landscape and biodiversity in the City Plan area. The City Plan refers on page 5 to the need to “influence the regeneration of the city	Comments noted. The City Plan will address the areas identified to ensure a balanced approach to protection of environment whilst accommodating growth needs.
Shopping	Must find compatible/imaginative uses for vacant shop premises. Quality of street environment an important factor.	Noted
Open space/playing pitch	<p>Retention of sufficient green space to balance the inevitable development</p> <p>We note that there is a Playing Pitch Strategy which covers the local plan spatial area and supports effective planning policies for protection and creating new sites. It is not clear whether works are on-going to implement the strategy with action plans and monitoring. After 3 years without regular review, the Council will need to consider carrying out this work again to keep the evidence base for playing pitches robust and up to date.</p>	The City Council actively negotiate for the inclusion of positive green spaces as part of any significantly sized development. A playing pitch strategy and open space strategy will also inform the preparation of plan polices.
Historic Environment	There are separate sections on employment, retail, offices, tourism etc. The consultation document is completely devoid of any reference to built heritage, landscape, and biodiversity issues. There is also no reference to urban design or the provision of green infrastructure, also key to producing “an attractive place to live and work”. These assets should not be treated as ‘in addition’ but should be an integral part of the City Plan at all stages. The approach suggests that the Council’s	Comments noted. The City Plan will address the areas identified to ensure a balanced approach to protection of environment whilst accommodating growth needs.

	<p>vision is telescopic and only focused on development. This is contrary to the approach set out in the NPPF.</p> <p>There are several references to historic heritage and cultural services in the document but they seem to have confined comments largely to city council cultural attractions. It may be helpful to add a reference to Gloucestershire Archives since it is a cultural/heritage resource for the whole of Gloucestershire and for South Glos but is located in Kingsholm. It also attracts a fair number of tourists (some of the local hotels advertise that they are close to Gloucestershire Archives). Our service also fits in with the desire to promote Gloucester as home of the “knowledge industry” as it is all about protecting and promoting Gloucestershire’s unique information.</p> <p>The SHLAA sites were considered suitable for housing appear to have been carried forward into the City Plan Options Document without the benefit of any further studies or assessments of sites. If this is the case then such an approach is again contrary the NPPF page 38, para. 157, expects Plans, amongst many other points to: “157. Crucially, Local Plans should: “ identify land where development would be inappropriate, for instance because of its environmental or historic significance; and “ contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.” 6. In assessing whether a site is a suitable option for allocation for residential development the Council should have considered existing environmental/historic environment constraints and carried out new surveys to update this information on appropriate sites.</p>	<p>This consultation was for Part 2 of the City Plan which relates to potential development sites. Heritage was mentioned in part 1 and will feature in part 3 which will contain the policies.</p> <p>Further evidence on heritage, biodiversity and landscape is currently being compiled to fully assess any constraints that will impact on potential development sites.</p> <p>Noted.</p> <p>Further work is in the process of being undertaken to assess amongst other things any heritage constraints on the sites.</p> <p>Part three of the City Plan will contain policies relating to the enhancement of the natural, built and historic environment.</p>
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Minerals and Waste	<p>There are a number of sites within the plan (A2, BT1, H1, KW1, KW3, KW5, KW6, L1,L2, WN1, WS13, 1S14) where the British Geological Survey resource maps suggest sand and gravel resources underlying the sites. The extent and economic viability of these resources should be assessed. Careful consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals.</p> <p>Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD. The waste minimisation statement requests consideration of sustainable waste management at the following stages; project planning and design stage, construction activities, operational life. In regards to waste minimisation, consideration should be given to policy WCS2 of the Waste Core Strategy.</p> <p>Consideration should also be made to core policy WCS11 Safeguarding Sites for Waste Management when allocating sites. A list of the waste sites within Gloucester City has been sent to the City Council and will be available on the GCC Minerals and Waste proposals map.</p>	<p>Noted. This issue will be discussed further with the County Council.</p> <p>Noted</p> <p>Noted - officers will cross reference all sites with the safeguarded sites waste management list.</p>
Housing	<p>In allocating sites for development it is important that the Council identify a sufficient quantum of the right 'type' of housing land to meet the needs and demands of the growing community.</p> <p>Over reliance on apartment development on infill sites rather than allocating larger sites for family housing. It is our view that the Council should allocate a mix of sites capable of delivering both apartment based redevelopment schemes and larger sites capable of delivering family accommodation. The Council should identify the most sustainable and appropriate locations for family housing development within the City boundary, based upon a clear understanding of the quantum of such housing needed to meet local demand.</p> <p>It would be useful to set out within the Plan that requirements for additional dwellings is a as result of increased household formation not simply from an increase in population.</p>	<p>Noted.</p> <p>The City Plan will provide for a mix and type of homes to meet local housing requirements.</p> <p>The JCS process will agree housing quantumns for the City.</p>
Biodiversity	<p>From a strategic biodiversity perspective we would like to draw your attention to guidance on taking account of the Gloucestershire Nature Map in Local Development Plans. This is to be found at http://gloucestershirebiodiversity.net/actionplan/guiding-principles.php on the right</p>	<p><i>Noted - Officers will cross reference sites with the Nature Map.</i></p>

	<p>hand side of the web page. The document is relevant to the consideration of ecological networks as required by the National Planning Policy Framework (NPPF).</p> <p>Although we appreciate that this is much more relevant to the JCS development documents, the City Plan's proposed development allocations should be checked to see if they are within or close to Strategic Nature Areas (SNAs) of the Gloucestershire Nature Map. This is being recommended so that a decision can be made as to where the City Plan should state that there will be a clear requirement for maximising a net gain for biodiversity. Where such an approach is identified and accepted then future sustainable development could contribute to a wider pattern of green infrastructure and ecological network enhancement across the county.</p> <p>The consultation document is completely devoid of any reference to built heritage, landscape, and biodiversity issues. There is also no reference to urban design or the provision of green infrastructure, also key to producing "an attractive place to live and work". These assets should not be treated as 'in addition' but should be an integral part of the City Plan at all stages. The approach suggests that the Council's vision is telescopic and only focused on development. This is contrary to the approach set out in the NPPF.</p> <p>The SHLAA sites were considered suitable for housing appear to have been carried forward into the City Plan Options Document without the benefit of any further studies or assessments of sites. If this is the case then such an approach is again contrary the NPPF page 38, para. 157, expects Plans, amongst many other points to: "157. Crucially, Local Plans should: " identify land where development would be inappropriate, for instance because of its environmental or historic significance; and " contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified." 6. In assessing whether a site is a suitable option for allocation for residential development the Council should have considered existing environmental/historic environment constraints and carried out new surveys to update this information on appropriate sites.</p>	<p>Further evidence on heritage, biodiversity and landscape is currently being compiled to fully assess any constraints that will impact on potential development sites</p>
<p>CIL</p>	<p>New housing development will create new demand for sport and physical activity facilities. Not anticipating or meeting this demand or being able to model supply will have a negative impact on sport and physical activity participation. In order to exert a positive and significant impact on the physical, mental and social health of these new communities we believe that all new housing proposals in Gloucester should</p>	<p>Noted.</p> <p>A playing pitch strategy is being prepared which will inform plan policies .</p>

	<p>provide for new, or enhance existing, sport and physical activity facilities and use planning obligations to secure and maintain such provision.</p> <p>Sport England supports use of planning obligations/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.</p> <p>All new dwellings in Gloucester in the plan period (up to 2031 and beyond) should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p>We would welcome the opportunity to meet with you to expand on the above and discuss how this could be incorporated in the Plan in the most beneficial manner, and in particular to look at the incorporation of the Llanthony Hydro Scheme within the Council's objectives and to secure s106/CIL contributions for it and the Leadon Valley scheme as part of Green Energy and Green Infrastructure within, and linking to, the City.</p>	<p>A CIL charging schedule is being prepared through the JCS which will need to be revisited once the City Plan infrastructure requirements are more fully understood.</p>
Waste Management	<p>Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD. The waste minimisation statement requests consideration of sustainable waste management at the following stages; project planning and design stage, construction activities, operational life. In regards to waste minimisation, consideration should be given to policy WCS2 of the Waste Core Strategy.</p> <p>Consideration should also be made to core policy WCS11 Safeguarding Sites for Waste Management when allocating sites. A list of the waste sites within Gloucester City has been sent to the City Council and will be available on the GCC Minerals and Waste proposals map.</p>	Noted

Tourism	<p>For a city with such a great history, medieval architecture, the Docks and the city's location these attributes are woefully exploited. Coming from Bath, where it could be argued that over-exploitation abounds, I find it incredible that Gloucester's rich past is overshadowed by Cheltenham's mono-Georgian glory and feel that more needs to be done to package the cathedral, city centre, docks, military and industrial heritage into an infrastructure package of hotels, restaurants adjacent to the main attractions. Furthermore coach and car parking should not be neglected but needs to be discrete and within walking distance.</p> <p>The developments at the dock are a step in the right direction, however, the shopping experience is pretty sterile and not everyone who enjoys living close to the waterfront wants to live in a converted warehouse. It is a shame that the opportunity wasn't taken to develop a marina bounded by modern residential, retail and recreation. Enhancement through the provision of affordable studios/workshops to develop an arts and crafts, and light industry should add vitality and improve vibrancy and sense of community and add to the attractions for tourists.</p>	<p>Many of these points should be addressed within a tourism strategy. Comments will be forwarded onto the tourism officer.</p> <p><i>Comments on mix of uses are noted and will be taken on board in terms of policies in the Plan.</i></p>
Development quantum	I read that the City is expected to build 6500 houses before 2031. I am unable to discover anywhere the justification for such a build programme. How can the Council justify new build when currently there are over 2000 houses that are not occupied within the City.	The justification for the overall housing requirement is being progressed through the strategic plan called the Joint Core Strategy which is being prepared jointly with the authorities of Gloucester, Cheltenham and Tewkesbury.
Infrastructure	In general support the use of brown-field sites and the re-classification of buildings for residential use. But this is on the basis that all successful applications require proper/timely contributions to the necessary investments in infrastructure.	<p>Comments noted.</p> <p>Matters of infrastructure provision are dealt with as part of the City Plan.</p>

Objectively Assessed Need	<p>The document would be enhanced and would provide a better understanding of the purpose of the City Plan if it were to refer more directly to the City's obligation to meeting its objectively assessed need for additional dwellings. Whilst we are aware that this objectively assessed need has not been confirmed in detail as yet through the JCS, the magnitude of that need and the magnitude of how much of that need can be met within the City boundaries, should be referred to together with the responsibility in the first instance to meet as much of that need as possible within the City boundaries. The Plan would also be enhanced in the same context by addressing the quantum of this need to be met within the City boundary that is capable of being met on brownfield sites.</p> <p>The City is not meeting all of its own need and under the duty to cooperate, some of the need is being met in Tewkesbury Borough. There is a duty on Gloucester to deliver the maximum number of dwellings in its own boundary.</p> <p>Plan should state that neighbouring authorities are being required to meet some of the need generated from Gloucester on allocating Green Belt/Greenfield sites of some environmental sensitivity to meet the City's need.</p> <p>Recognise in the Plan that the requirement for additional dwellings is as a result of increased household formation not simply from an increase in population.</p>	<p>Comments noted.</p> <p>The City Plan will refer to its development requirements as suggested.</p> <p>This issue is currently being progressed through the JCS.</p> <p>The City Plan will identify all suitable, available and achievable capacity within its boundary.</p>
Health/Sport	<p>The importance of sport should be recognised as a key component of local plans, and not considered in isolation. We believe that it is essential that there is a planned approach to the provision of facilities and opportunities for sport and physical activity in order to ensure that the needs of local communities are met and that supply meets demand.</p> <p>Being active should be built in to everyday life. There are many examples of good quality urban design principles and practices that make it easy for communities to be more active and healthy. Increasingly this approach is known as Active Design which focuses on improving accessibility; enhancing amenity and increasing awareness.</p>	<p>Noted.</p> <p><i>Officers will further consider the use of Active by Design when evidencing and drafting design policies for the City Plan.</i></p> <p><i>A playing pitch strategy is being prepared which will inform the preparation of related plan policies.</i></p>

<p>Design</p>	<p>Being active should be built in to everyday life. There are many examples of good quality urban design principles and practices that make it easy for communities to be more active and healthy. Increasingly this approach is known as Active Design which focuses on improving accessibility; enhancing amenity and increasing awareness.</p> <p>Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.</p> <p>Sport England would encourage the developers to design future proposals in Gloucester in line with the Active Design principles.</p>	<p>Noted.</p> <p><i>Officers will further consider the use of Active by Design when evidencing and drafting design policies for the City Plan.</i></p>
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SHLAA issues

Issue	Representation	Response
Inconsistencies between 2011 and 2012 SHLAA	No evidence alluded to in 2012 SHLAA to support changes in approach between 2011 and 2012 SHLAA's with regard to site known as Land east of Hempsted.	Noted. The 2012 SHLAA was informed by the emerging JCS Landscape Characterisation and Sensitivity Analysis evidence work which did not include the site 'Land east of Hempsted' as it was considered to lie within the existing urban area of the City, and therefore not subject to a landscape designation to render it 'unsuitable' for development in the SHLAA. Neither at this time was the site subject to a statutory adopted landscape protection policy. Additional landscape work commissioned by the City Council from WSP and published in autumn 2013 identified developable areas of the site. The site is now the subject of an outline planning permission that was granted in December 2014.
2012 SHLAA not properly prepared	2012 SHLAA not prepared in accordance with guidance contained in the DCLG 2007 SHLAA Guidance or the NPPF.	Noted. Gloucester City has always endeavored to prepare an accurate and up to date SHLAA that takes account of the emerging evidence base of both the JCS and City Plan development plan documents in accordance with emerging government guidance, including the NPPF.

2012 SHLAA sites found 'suitable' carried forward into 2013 consultation document without further evidence.	A sites options document should be accompanied by an additional evidence base to support sites where they have previously been subject to historic or environmental constraints.	Noted. The 2013 sites consultation document was based on sites considered 'suitable' for development in the 2012 SHLAA. Preparation of the City Plan is an iterative process, new landscape and historic environment evidence will support future City Plan consultations.
2012 SHLAA is developer led and does not take account of existing policy designations.	The 2012 SHLAA is a response by the City to the need for the JCS to release green belt sites in Tewkesbury Borough in order to accommodate the City's future growth. The Council should be aiming to provide a good quality environment in the City as well as meeting housing needs.	Noted. The NPPF requires local planning authorities to demonstrate a 5 year supply of suitable, available and deliverable sites for the delivery of housing. In preparing a SHLAA the authority is obliged to consider all sites within the City promoted to them for this purpose, this includes both green field as well as brown field sites. Within the City where green field sites are not covered by a statutory national designation, in the absence of any locally up to date adopted or saved policy, such sites are considered 'suitable' for development.
SHLAA & SELAA identifying development opportunities	The Highways Agency notes that development opportunities have been identified through the SELAA and SHLAA process in line with national policy. Highways Agency also note that many proposed allocations were also contained in the LDF Site Allocation and Designation Document and Central area Action Plan both of which reached preferred option stage in 2006.	Noted. (Former Highway Agency now known as Highways England).

Sustainability Appraisal issues

Issue	Representation	Response
General comment	Not clear whether the Highways Agency was consulted on the SA Scoping Report in 2005.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. The City Plan will be assessed from a SA perspective in accordance with the SA Scoping Report (October 2008). The Highways Agency was engaged in the preparation of this Scoping Report.
Highways	SA could be expanded to include reference to the kinds of transport mitigation which may be necessary to mitigate the effects of different proposals.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base, which includes detailed highways work.
Highways	Strongly agree with the statement that it will be necessary to consider cumulative impacts as opposed to just impacts on a site-by-site basis. However, no information is provided on what evidence has, or will be prepared, to analyse cumulative effects, transport or otherwise.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base, which includes detailed highways work.

Hempsted	<p>The appraisal for Hempsted is very light in detail and appears to be confined to a description of all that is good about Hempsted.</p> <p>The SA fails to properly appraise the different sites in Hempsted, in particular it fails to describe the importance of the open agricultural fields to the east and west of Hempsted Lane in terms of retaining the special rural character and separate village identity of Hempsted.</p> <p>The SA contains no reference to any negative impacts of developing any sites in Hempsted. There does not appear to have been a proper SA carried out for Hempsted and the Council must do this before it takes any more steps in the City Plan preparation.</p>	<p>At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base.</p>
WS12 – Land East of Hempsted Lane	The assessment ignored constraints identified in the Hempsted Conservation Area: Appraisal and Management Proposals.	WS12 now has Outline planning permission for residential development granted in December 2014.

<p>WS12 – Land East of Hempsted Lane</p>	<p>Biodiversity</p> <p><i>Current Situation and Opportunities</i></p> <p>It is unclear what level of biodiversity the fields East of Hempsted Lane support. They do link with the wider countryside and River Severn valley and floodplain and may well be used by a variety of wildlife visiting from these areas. The now established planting of deciduous hedgerow species along the eastern and southern boundaries may also have provided new habitats for birds and other species. There are the remains of the last surviving old orchard in Hempsted, which also provides a habitat for mistletoe. There also appears to be evidence of springs in the fields which could also be attractive as a habitat. The fields have the potential to create part of a green infrastructure network in this part of the City which could provide a major opportunity for creating and enhancing habitats, benefiting the wider community in south Gloucester.</p> <p><i>Impact of Development</i></p> <p>Development of the site for housing will prevent use of the area by any wildlife, destroy hedgerow habitats or make hedgerow habitats less attractive</p>	
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	<p>to wildlife and prevent opportunities for provision of green infrastructure.</p>	
<p>WS12 – Land East of Hempsted Lane</p>	<p>Natural Environment: Objectives: Improve soil quality; Protect and enhance landscaped character</p> <p><i>Current Situation and Opportunities:</i> In terms of agricultural use the fields currently provide grazing for cattle and it is therefore assumed the soils provide for good growth of grass. At one time the area supported an orchard which because of lack of management has deteriorated in quality. Historically the area supported a ridge and furrow farming system which suggests a fertile soil.</p> <p>The fields are in active agricultural use for grazing and the soils appear capable of supporting other forms of agriculture.</p> <p>Impact of Development: Complete loss of existing and potential agricultural uses.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>

<p>WS12 – Land East of Hempsted Lane</p>	<p>Natural Environment: Objective: Protect and enhance landscaped character.</p> <p><i>Current Situation and Opportunities:</i> The fields form an important part of a belt of continuous orchard, meadow and playing fields that run south to north from Hempsted to, and including, the Gordon League rugby ground and abut the Inner Relief Road (Secunda Way). The fields and Hempsted playing field are currently designated as part of a wider 'Landscape Conservation Area' designated in existing Local Plans. The fields proposed for housing, together with fields to the west of Hempsted Lane are critically important to the setting of the conservation area. They help to preserve the sense of separation from Gloucester, to maintain the green and rural village character and identity of Hempsted, and they protect important views.</p> <p>There are opportunities to enhance the landscape character by laying the recently established hedgerows which would also further enhance important views of Robinswood Hill and other high ground and features.</p> <p>Impact of Development:</p> <p>To develop fields that are an integral part of the</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>
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	<p>rural character of Hempsted would be to change the character of the conservation area, sever the link with the agricultural past, lead to a much denser village scene, tip the balance in the village mix of modern and historic buildings in favour of the modern, and lead to the loss of panoramic views towards Robinswood Hill and the Cotswolds escarpment views (whilst some of these views are temporarily partially obscured by planting of hedgerow trees along Hempsted Lane, there are still views from the farm gate adjacent to Manor Farm House and from the footpath leading from Hempsted lane to the children's play area and playing field). It would result in the coalescence of the main urban area with the resulting total loss of the village character and identity of this part of Hempsted.</p>	
WS12 – Land East of Hempsted Lane	<p>Built Environment: Objective - Protect and enhance the distinctive townscape quality and historic heritage</p> <p><i>Current Situation and Opportunities:</i> See comments above on 'Protect and enhance landscaped character' which are equally relevant to townscape quality and historic heritage. In addition the fields contain a complete medieval ridge and furrow system, with strips running in an elongated S shape, and headlands representing the turning point of the plough. This is one of only two examples in Gloucester District.</p>	WS12 now has Outline planning permission for residential development granted in December 2014.

	<p>A Council interpretation board along the southern boundary of the site explains the significance of the ridge and furrow as well as the views toward Gloucester Cathedral and of the industrial heritage of the Gloucester and Sharpness Canal; and the old orchard trees and mistletoe; These fields are a valuable educational resource for the whole City as well as of great importance to the distinctive townscape and historic heritage.</p> <p>Impact of Development:</p> <p>See impacts under 'Protect and enhance landscaped character' which are similar. In addition development would result in the loss of the ridge and furrow field system.</p>	
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Gloucester City Council

Meetings:	Planning Policy Sub-committee Council	Date:	18 June 2015 23 July 2015
Subject:	Statement of Community Involvement		
Report Of:	Cabinet Member for Housing and Planning		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officers:	Anthony Wilson, Head of Planning Claire Rawlings, Principal Planning Officer		
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Appendices:	1. Statement of Community Involvement 2. Schedule of comments received		

FOR GENERAL RELEASE

1.0 Purpose of Report

- 1.1 To update on the Council's Statement of Community Involvement (SCI) following its public consultation and to seek approval for its formal adoption.

2.0 Recommendations

- 2.1 That Planning Policy Sub-committee is asked to **RECOMMEND** that the minor revisions made to the draft SCI following public consultation be endorsed.
- 2.2 The Council is asked to **RESOLVE** that the SCI attached at Appendix 1 be formally adopted for planning policy and development control purposes.

3.0 Background: Statement of Community Involvement

- 3.1 The Council is obliged to prepare a Statement of Community Involvement (the SCI) pursuant to Section 18 of the Planning and Compulsory Purchase Act 2004. The SCI sets out who, when and how Gloucester City Council will engage with communities and key stakeholders during the planning process. This includes the preparation of development plan documents such as the Gloucester City Plan and consulting on planning applications.
- 3.2 The Council's last SCI was adopted in 2005. As a consequence, it is now out-of-date in that the secondary legislation around the preparation of development plan documents has been replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. The existing SCI does not take account of the

Council's legal obligations under the Localism Act 2011 or other changes in development management practice.

- 3.3 An updated draft SCI was approved by Council for consultation purposes on 22 January and delegated authority was given to the Head of Planning in consultation with Head of Legal and Policy Development to make any minor changes to this statement arising from comments received during the consultation period.
- 3.4 The consultation ran from 2 February to 16 March 2015 and during this time 11 responses were received of which two related to budget issues. These two representations have been redirected to Head of Finance. The remaining nine responses were either supporting/commenting on the SCI with no objections received. A schedule of comments and officer responses are provided at Appendix 2 of this report and this has resulted in a number of small amendments being made to the SCI. The revised SCI can be found at Appendix 1 and is being presented to Council for adoption as Council policy for planning policy and development control purposes.

4.0 Alternative Options

- 4.1 There are no alternative options relevant to this matter.

5.0 Reasons for Recommendations

- 5.1 This report has been prepared because Council approval is required in order to adopt the SCI.

6.0 Future Work and Conclusions

- 6.1 There is no additional work required.

7.0 Financial Implications

- 7.1 No financial implications.

(Financial Services have been consulted in the preparation of this report).

8.0 Legal Implications

- 8.1 The SCI is a statutory requirement under Section 18 of the Planning and Compulsory Purchase Act 2004.

(Legal Services have been consulted in the preparation of this report).

9.0 Risk & Opportunity Management Implications

- 9.1 The risk of being judicially reviewed in connection with the out-of-date SCI is minimal but it is expedient that this document is updated before the Gloucester City Plan is progressed.

10.0 People Impact Assessment (PIA):

- 101 A PIA screening review was undertaken. It identified that the aim of the SCI is to clarify how the Council will consult the public and how local peoples' views will be taken into account in the plan making and planning application decision processes. The solutions identified are both cost effective and appropriate to the various communities in the city, having built on existing local practice.
- 10.2 The PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

11.0 Other Corporate Implications

Community Safety

- 11.1 None.

Sustainability

- 11.2 None.

Staffing & Trade Union

- 11.3 None.

Background Documents:

None.

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Gloucester City Council Statement of Community Involvement

July 2015



Gloucester
City Council

Gloucester City Council

Statement of Community Involvement

July 2015

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Foreword

Gloucester City Council believes that all those who live, work and enjoy the City should be given the opportunity to engage actively and influence how it will grow and develop.

The City Council is committed to ensuring that all those who wish to be involved in the preparation of development plans and determination of planning applications are able to. This Statement of Community Involvement (SCI) explains who, when and how the Council will consult on planning matters.

The City Council first produced an SCI in January 2005. Much has changed since then, including changes to the regulations which set out the ways in which Government expects plans to be produced. The City Council also takes seriously its commitment to deliver the Government's localism agenda.

This update of the SCI more accurately reflects the new plan production requirements whilst ensuring involvement of all residents, businesses and important groups and organisations in the preparation of the City's Local Plan and in consulting on planning applications. The SCI sets out transparent, accessible and meaningful approaches to community involvement on planning matters.

Many local people will be aware that Gloucester City Council is currently preparing a joint planning document with Cheltenham Borough and Tewkesbury Borough Councils, called the Joint Core Strategy (JCS). A Joint Consultation Statement (November 2011) has been prepared which explains the consultation arrangements for the production of this Plan. This can be found by clicking on the following link:

<http://www.gct-jcs.org/PublicConsultation/>



Councillor Paul James
Leader of the Council

1. Introduction

- 1.1 This document is called Gloucester City Council's Statement of Community Involvement (SCI). Its main purpose is to set out who, when and how Gloucester City Council will engage with communities and key stakeholders during the planning process. This includes engagement in the preparation, alteration and continuing review of development plan documents (such as the Gloucester City Plan) and supplementary planning documents, as well as consulting on planning applications. The Council is legally required to prepare and adopt a statement of community involvement¹ and once adopted has to comply with it. The revised statement was adopted by the Council in July 2015.
- 1.2 This SCI will replace the Council's existing SCI which was adopted in 2005. The SCI needs to be revised to reflect changes in the legal requirements for consultation on local plans and in the determination of planning applications. These changes have been made in order to encourage more efficient production of plans and processing of applications.
- 1.3 Plan preparation covers production of **Development Plan Documents (DPDs)** which set out planning strategy, policies and proposals for the City's administrative area. These provide the planning framework for the area and are the main consideration in determining planning applications. The Council's Local Development Scheme sets out the programme for the preparation of planning documents ensuring consultation activities are staggered and that the SCI requirements can be met without undue pressure on resources. The Council is currently involved in the preparation of two development plan documents including the Joint Core Strategy² (JCS) and the City Plan. Collectively these will form the Local Plan for the City. The Regulations³ set out three main stages of plan production where consultation is required. These are:
- Preparation of a Development Plan Document (Regulation 18).
 - Publication of a Development Plan Document (Regulations 19 and 20).
 - Submission of a Development Plan Document to the Secretary of State (Regulation 22).
- 1.4 Section 3 of this SCI sets out the consultation requirements at each stage in more detail.
- 1.5 Gloucester City Council will occasionally produce **Supplementary Planning Documents (SPDs)** to add further detail to the policies and proposals contained with its development plan documents. The regulations set out two stages of plan production where some consultation is required. These are:
- Publication stage (Regulation 12).
 - Adoption (Regulation 14).
- 1.6 Section 3 of this SCI sets out the consultation requirements at each stage in more detail.

¹ A statement of community involvement is required under Section 18 of the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, Localism Act 2011, and is informed by the National Planning Policy Framework 2012

² The JCS is being prepared with Cheltenham and Tewkesbury Boroughs and has its own overarching consultation statement November 2011

³ The Town and Country Planning (Local Planning) (England) Regulations 2012

- 1.7 Every year the Council processes a large number of planning applications. The nature and scale of these applications vary from householder and minor applications to large scale major applications for residential, employment, retail developments. The nature, scale and type of application will determine the level of consultation and community engagement undertaken.
- 1.8 In addition to the legal requirements above, Section 110 of the Localism Act 2011 sets out a **'duty to cooperate'**. It is a requirement that Local Planning Authorities engage with neighbouring authorities and other statutory bodies to consider joint approaches to plan making. Gloucester City Council is committed to meeting this duty and intends to work closely with neighbouring authorities and other partner organisations and stakeholders.
- 1.9 As part of this Duty to Cooperate a Memorandum of Understanding (MoU) has been compiled via the County Planning Officers Group (CPOG) and has been agreed as an officer CPOG agreed statement.

Section 9 of this MoU requires the following consultation arrangements to be met:

Each local planning authority signatory will:

- a) Notify the signatories in advance of each consultation stage in the preparation of its Local Plan;
 - b) Notify the signatories of consultation on any other planning document which, in its view, would have a significant impact on strategic planning or development within the Gloucestershire area;
 - c) If requested, meet with and discuss any issues raised by one or more of the other signatories and take into account any views expressed on those issues;
 - d) Notify the signatories of any major planning applications, from within its area or on which it is consulted by a local authority from outside its area, which would, in its view, have a significant impact on the strategic planning and development of the Gloucestershire area;
 - e) Take into account any views expressed in determining the application.
- 1.10 This statement of community involvement is divided into five main sections:
- Planning Policy Documents - community engagement.
 - Planning Policy Documents - consultation tables.
 - Gloucester City Council standards for planning applications.
 - Resourcing and management.
 - Monitor and review.

2. Planning Policy Documents - Community Engagement

Who do we consult?

- 2.1 The Local Planning Regulations set out who must be consulted at key stages of plan production. These are known as the specific consultees and an indicative list is provided at Appendix A.
- 2.2 The Council also identifies a number of other bodies who it may wish to consult at key stages. These are known as general consultation bodies and an indicative list is provided at Appendix B.
- 2.3 In addition, the Council is committed to involving a wide range of other individuals and organisations including members of the Community and hard to reach groups. The Council will use a range of consultation techniques in seeking to engage with different groups to establish the most effective means of enabling all the City's communities to make their views known and help shape planning decisions in their area. Some people will prefer direct contact with the council, either face-to-face or over the phone. Others may prefer communicating through the web, emails or text messaging. Some may need directly targeted communication because of disability, culture, language or literacy factors. In preparing our planning documents we will go further than consulting with the required consultees by trying to engage groups such as young people, ethnic minority groups, people with disabilities, elderly people, people in disadvantaged neighbourhoods and/or people with special housing or employment needs.
- 2.4 The Council will maintain an address database for consultation purposes and will seek to update this.

How do we consult?

- 2.5 The legal requirements concerning 'how' the Council must consult on Planning documents are set out in the Town and Country Planning (Local Planning)(England) Regulations (2012)(The Regulations).
- 2.6 A significant challenge for all local planning authorities is ensuring that all stakeholders are involved early enough in planning processes to enable them to have meaningful input. Early involvement can help to resolve any initial conflicts and can generate a sense of ownership. The Council will ensure that any consultation activities associated with the planning process will be co-ordinated with other Council services including the Neighbourhood Management Team.
- 2.7 To address this issue and engage effectively over a range of planning documents the Council will use a combination of transparent, accessible and meaningful consultation methods appropriate to the resources available, the policy area being prepared and its stage of preparation. Table 1 sets out a range of formal and informal community involvement methods and techniques which are considered most appropriate for use.
- 2.8 There is no significance in the order of the various methods and it is not anticipated that every one of these methods need be used. The list should be regarded as a menu from which to choose.

Table 1 - Community Involvement Methods

Method	Main Considerations
Council website	Information can be provided quickly and efficiently and accessed by the public from their own home or office at a time which is convenient to them. It should be user friendly and is also a useful means of providing feedback for those taking part in consultation exercises.
Email	This is a minimum requirement - information and responses can be provided quickly and efficiently. Where groups and individuals have an email address, information will normally be sent electronically.
Formal advertisements e.g., statutory notices	This is a minimum requirement - Statutory requirements to publish notices advertising planning applications and to invite representations during preparation of planning documents.
Media coverage - press releases, adverts, radio	Local newspapers/radio stations can be requested to carry articles about planning proposals/documents to raise awareness. It is cost effective in terms of bringing local issues into the local arena. Items may only be reported if they are considered newsworthy.
Consultation documents available for sale or CD or inspection at deposit locations including Council offices and libraries, by post and on the Internet	This is a minimum requirement. Traditional means of consultation and the information supplied can be in detail. Information needs to be in plain English with simplified formats. Council offices and documents should be accessible to those with disabilities.
Leaflet, newsletters and brochures	Can publicise and explain in simple language and invite comment. Newsletters can be sent to all residents; however, may be viewed as junk mail and disregarded. Can be expensive to distribute.
Formal written letter	Minimum requirements to consult statutory and other relevant consultation bodies by letter. High postage and administration costs.
Public exhibitions, public meetings and presentations	Can be used to circulate information, seek views and endorse proposals. Gives residents some flexibility in deciding when to visit and can encourage feedback. However, people attending may not be representative of the whole community. It does take planning issues to the people and provides an opportunity for people to discuss local issues directly with planning officers in an environment which local people will be familiar and therefore comfortable with. High staff costs in producing display material and manning the exhibition with no guarantee of turn out. Displaying information in local shops where people frequent should also be considered where appropriate.
Notices displayed on a site	Direct and local notification of proposals to those around a site, however notices can be vandalised or removed before the consultation period ends.
Through partnership organisations and	Useful for topic based discussions and to find out what specific groups feel. Provides opportunity to discuss issues in depth and to have ongoing dialogue. However high direct costs of facilitating.

Method	Main Considerations
focus groups, existing forums and panels	Important to build on existing networks rather than reinvent.
Councillor networks	Councillors play a very important role in terms of community engagement. They are a recognised point of contact for the local community to go to with regard to Council matters. It is vital to ensure that Councillors are kept well briefed.
One to one meetings and briefings	Useful for seeking views from targeted groups/individuals however they are time consuming and impracticable to use on a comprehensive basis.
Parish and Local Strategic Partnership (LSP)	Involve Quedgeley Parish Council and LSP with consultation exercises. They provide an invaluable contact with local communities. Also opportunity to assist in the preparation and distribution of consultation material (for example, on local notice boards and other appropriate locations).
Questionnaires and surveys	Enables quantifiable information to be collected. Questionnaires need to be well designed. No guarantee of likely response rate. Time consuming and costly.
Workshops and focus groups	Organised discussion based event to present and gather information. Can be targeted at key stakeholders. Requires skilled facilitators to ensure objectives are achieved.
Social Media	Twitter and Facebook can be a useful source for raising profile and signposting people to consultation events.

2.9 The Council will maintain a record of consultation responses received during the preparation of planning documents and will present a transparent decision making process to the community. Consultation responses are one of the matters to be taken into account by the Planning Policy Sub-Committee and Full Council when making decisions on plan making. A Consultation Statement will be produced for every planning document which will include summaries of all consultation responses received as well as officers' responses which will identify where the document has been amended in light of responses received. The Statement will be reported to members no later than the date that they consider making decisions on planning documents. The comments received will be made publicly available so they can be viewed by others with an interest in the matter.

When do we consult?

2.10 This section identifies when the Council will consult on emerging planning documents. It sets out the legal requirements governing development plan documents (DPDs) and supplementary planning documents (SPDs).

Development Plan Documents (DPDs)

2.11.1 The process for Development Plan preparation is provided at Figure 1. There are three main stages:

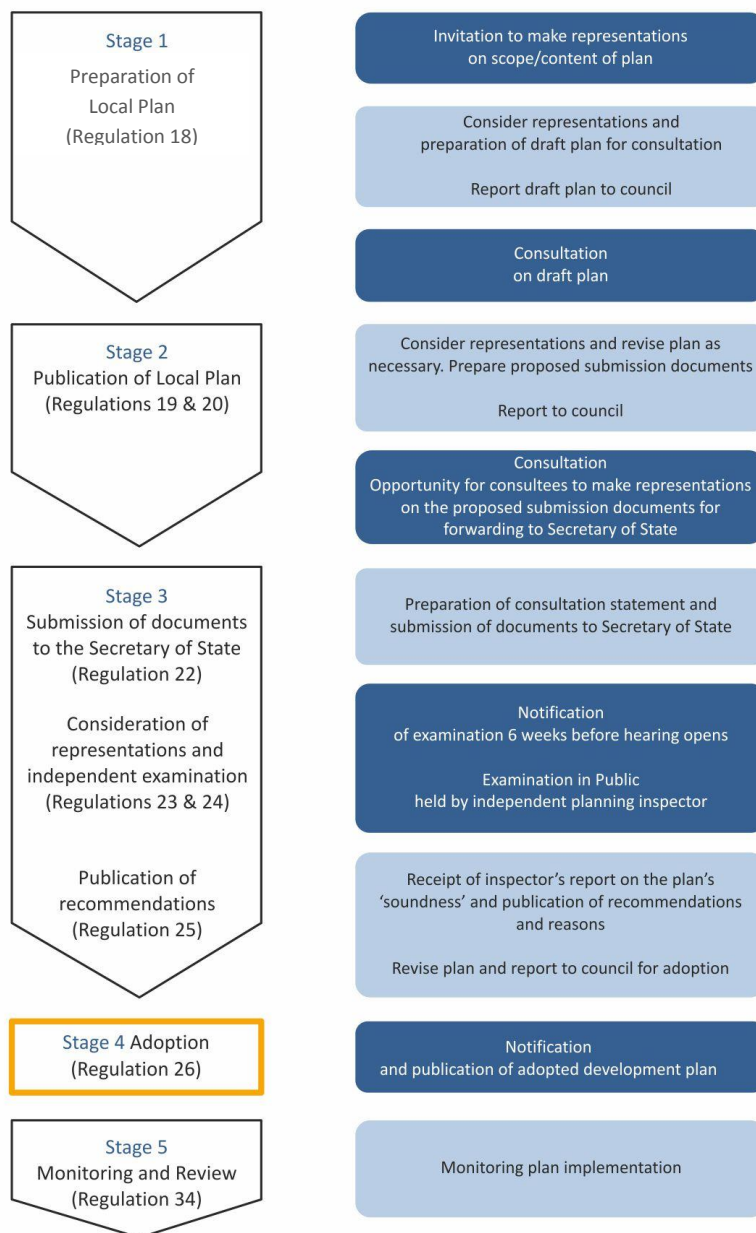
- (a) Preparation of a Local Plan (Regulation 18): consultation bodies are invited to make representations about what a Local Plan ought to contain.
- (b) Publication of a Local Plan (Regulations 19 and 20): copies of a proposed Local Plan and associated documents are made available for inspection for 6 weeks. The Council invites

interested parties to make formal representations at this stage. This is the final stage when formal representations can be made.

- (c) Submission of a Local Plan to the Secretary of State (Regulation 22): a copy of the proposed plan and associated documents is submitted to the Secretary of State for examination. An independent inspector is subsequently appointed to examine soundness of the plan. The Council provides the Inspector with the formal representations made at previous stages. At this stage the Council cannot consider new representations, although opportunities exist for additional statements to be made to support those previously made.

- 2.12 The Local Plan is then examined by the Inspector to ensure that it is sound and has met legal and procedural requirements including whether it has been prepared in accordance with the SCI. The inspector will consider all duly made representations and may invite the Council to make modifications to its Plan in order to make it sound. Further consultation is normally required in relation to these modifications. Consultation responses at this stage are considered by the Inspector and not the Council.
- 2.13 Subject to receiving a satisfactory Inspector's report that the Local Plan is sound, the Council will be in a position to adopt the DPD.
- 2.14 All DPDs require a Strategic Environmental Assessment (SEA) of the policies and proposals and Sustainability Appraisal (SA) which are produced with the Plan and assess the environmental, economic and social impact of its policies and proposals. These appraisals are usually consulted on and examined at the same time as consultation on the DPD.

Figure 1: Development Plan Document Preparation Stages
Town and Country Planning (Local Planning)(England) Regulations 2012



Supplementary Planning Documents (SPDs)

- 2.15 Gloucester City Council will occasionally produce Supplementary Planning Documents (SPDs) to add further detail to the policies contained with its development plan documents. SPDs can be area or topic based.
- 2.16 There are two main stages of SPD production where some form of consultation is required by the regulations. These are:
- Publication stage (Regulation 12): This involves making a copy of the proposed SPD available for inspection and representations are invited.

- Adoption (Regulation 14): This is when the Council will be in a position to adopt the SPD once it has considered any representations that have been made at publication stage.

2.17 The Council may if necessary include an additional preliminary stage to seek comments as part of the preparation of the SPD.

Neighbourhood Plans

2.18 The Localism Act 2011 introduced the ability for qualifying communities to draw up neighbourhood plans for their areas, which are consistent with the Council's development plans. The preparation of neighbourhood development plans is subject to separate regulations (The Neighbourhood Planning (General) Regulations 2012).

2.19 Neighbourhood groups - forums - are required to undertake pre-submission consultation themselves as set out in the regulations. The role of the local planning authority is largely one of notification and formal submission consultation (the processes being prescriptively set out in the regulations and the methods used will follow the notification processes set out in Table 2). The plan is then examined by an independent person and a referendum of the local neighbourhood is held. Gloucester City Council will provide support to groups in producing neighbourhood documents where qualifying bodies come forward.

2.20 At the time of writing, Gloucester City Council is collaborating with the Hempsted Community Forum on the preparation of its Neighbourhood Plan.

3. Planning Policy Documents Consultation Tables

3.1 Tables 2 and 3 identify consultation arrangements for the production of Development Plan Documents and Supplementary Planning Documents identifying who will be consulted, when and how.

Table 2 Consultation on Development Plan Documents⁴

Stage	Preparation	Who	How
Preparation of a local plan (Regulation 18)	Evidence gathering Scope of the plan	<ul style="list-style-type: none"> • Specific and general consultees • Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, internet, forums, press releases, deposit locations, workshops
Publication of a local plan (Regulations 19 and 20)	Consult on proposed submission document	<ul style="list-style-type: none"> • Specific and general consultees • Those registered on Council's database • Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, internet, press releases, exhibitions, questionnaires, forums, events, deposit locations
Submission of documents and information to the Secretary of State (Regulation 22)	Submission of Local Plan and all associated documents in accordance with Regulation 22	<ul style="list-style-type: none"> • Specific and general consultees • Those registered on the Council's database • Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate • Those who have responded previously/asked to be notified of submission 	Letter, email, internet, deposit locations
Independent examination (Regulation 24)	Independent examination of plan by an appointed Inspector	<ul style="list-style-type: none"> • All those who made representations 	Letter, email, internet, press releases, deposit locations

⁴ Please note that this table contains an overview of consultation methods available for each stage of Local Plan preparation. Not all methods will be used in each case, but those most suitable and appropriate given the scale and nature of the consultation will be used.

Adoption (Regulation 26)	Adoption of the plan by the Local Planning Authority	<ul style="list-style-type: none"> • All those involved in the process 	Letter, email, internet, press releases, deposit locations
Monitoring	After adoption of the plan	<ul style="list-style-type: none"> • Specific consultees • Any other residents or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, internet

Table 3 Consultation on Supplementary Planning Documents⁵

Stage	Preparation	Who	How
Preparation stage	Evidence gathering Preparing Draft SPD	<ul style="list-style-type: none"> • Any relevant consultees, residents wishing to make representations or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, Internet, meetings
Public participation stage (Regulation 12)	Consult on Draft SPD	<ul style="list-style-type: none"> • Specific and general consultees • Those registered on the Council's database • Any other residents wishing to make representations or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, internet, press releases, exhibitions, questionnaires, forums, events, deposit locations
Adoption (Regulation 14)	Adoption of the plan by the Local Planning Authority	<ul style="list-style-type: none"> • All those involved in the process 	Letter, email, internet, press releases, deposit locations
Monitoring	After adoption of the plan	<ul style="list-style-type: none"> • Specific consultees • Any other residents or other persons carrying out business in the area that the Council considers appropriate 	Letter, email, internet

⁵ Please note that this table contains an overview of consultation methods available for each stage of the plan preparation process. Not all methods will be used in each case, but those most suitable and appropriate given the scale and nature of the consultation will be used.

4. Gloucester City Council Standards for Planning Applications

- 4.1 Gloucester City Council places great importance on public involvement in the planning application process. This section explains how the Council will encourage the community to become involved in this process and also explains the Council's expectations of applicants. Finding out what local residents and businesses think about new development is a fundamental part of the Council's Development Management Service and Gloucester City Council undertakes its legal obligations in a proactive manner. It accepts that local people have local knowledge and can provide a useful insight into local matters.
- 4.2 In terms of carrying out consultation, the Council is chiefly guided by the provisions of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Procedures for planning applications that are related to Listed Buildings or Conservation Areas are covered by the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.3 Gloucester City Council ensures that every planning application is given a level of publicity that is commensurate with the size and nature of the proposal. In many instances, however, Gloucester City Council goes beyond what is legally required. For example, the Council undertakes consultation in relation to Reserved Matters applications (i.e. approval of details following the granting of outline permission) despite the fact that this is not a statutory requirement. Similarly, when amended plans are submitted with significant changes, the Council may re-consult with neighbours and relevant consultees. Change of use applications are also given site notices, which few authorities do.
- 4.4 Gloucester City Council will also seek to consult an appropriate range of statutory and non-statutory consultees. These could include organisations such as the Environment Agency, Heritage England and Severn Trent Water. Officers will also use their judgment and consult an appropriate range of non-statutory consultees. Over and above this, the Council will consult Quedgeley Parish Council on applications within their jurisdiction.
- 4.5 Neighbour notification letters are sent to residents that are likely to be affected by a proposed development. As part of this process, a list of material considerations is enclosed to ensure that any representations that the neighbour wishes to submit are kept solely to planning issues and not with regard to any personal matters.
- 4.6 Other measures adopted by Gloucester City Council include the application of a 40m consultation radius in respect of applications that involve a change of use to hot food takeaway. In addition, where objections are received to such proposals and the Council is recommending that permission be granted the application cannot be dealt with by Officers under delegated powers. It must therefore be taken to planning committee.
- 4.7 The City Council keeps a register of all current planning applications which can be viewed on the public access system. In addition, a 'weekly list' of planning applications is prepared and can be viewed on the Council's website.
- 4.8 The Council operates a system of public speaking at Planning Committee allowing individuals the opportunity to make their views about specific proposals known. This is supplemented by high-quality PowerPoint presentations on all Planning Committee items including plans and colour photographs.

- 4.9 In its drive towards a more transparent and accountable planning system and in the spirit of localism, the Government is encouraging local authorities when considering *significant* development proposals, to build on minimum consultation requirements and in particular to encourage more pre-application discussions and early community consultation.
- 4.10 For the purposes of this SCI, Gloucester City Council considers development to be *significant* if it meets any of the following criteria:
- Applications which constitute a significant departure from the most up to date Local Plan.
 - Applications for 50 or more homes.
 - Proposals which entail more than 1,000m² of gross floorspace.
 - Applications which are accompanied by an Environmental Statement.
- 4.11 This schedule is based on the Council's Delegation Scheme under which certain applications must go to the Planning Committee and cannot be dealt with under Delegated Officer Powers⁶.
- 4.12 There may also be occasions when applications are submitted that do not necessarily fall into any of the above categories but for various reasons may be considered to fall into the *significant* category. Officers will use their discretion in such instances.
- 4.13 In dealing with applications that meet any of the above criteria, officers will normally:
- Publish a newspaper advertisement, put up a site notice and notify an appropriate number of neighbouring properties.
 - Publish details of the application on the Council's website.
 - Report to the Planning Committee any additional representations that may have been received following the publication of the report.
- 4.14 For major developments, Gloucester City Council strongly encourages applicants before the application is submitted to arrange a public meeting or exhibition at a suitable location such as a local hall in close proximity to the application site, in order to allow the proposal to be more fully understood by the local community prior to submission.
- 4.15 When they submit their application, Gloucester City Council also encourages applicants to:
- Submit a brief statement as part of the application submission outlining how the results of the Pre-application Consultation Exercise have been taken into account in the final application documentation.
 - Attend meetings with local groups that are likely to have an interest in the application proposal.
- 4.16 Although there is no legal obligation for applicants to undertake the above steps, failure to consult properly may lead to objections being made by interested parties such as neighbouring residents, which could be material to the determination of the application.

⁶ Gloucester City Council's constitution can be viewed online. Go to <http://www.gloucester.gov.uk/council/more/Pages/council-constitution.aspx>

- 4.17 Gloucester City Council aims to encourage discussions to take place before any major application is submitted in order to try and achieve a degree of consensus and/or at least a clearer understanding of what the proposal is trying to achieve. The City Council has introduced a pre-application service to provide applicants with guidance prior to the submission of an application. There is a reasonable charge for this service and full details can be found on the Council's website.

5. Resourcing and Managing the Process

- 5.1 In preparing this approach to community consultation and to ensure that it is deliverable consideration has to be given to the resources available to manage the process. The Local Development Scheme (LDS) sets out the resources the Council has at its disposal to prepare the City's Development Plan documents. Officer time is a key resource issue. A balance has to be struck between consultation and the various production and management issues associated with the range of planning documents that are to be prepared.
- 5.2 The budget for Development Plan preparation will need to meet the costs of the legal requirements for community involvement in plan making. The Council's Local Development Scheme sets out a phased programme for the preparation of Development Plan Documents, ensuring that consultation activities are staggered and that the SCI's requirements can be met without undue pressure on staff resources. Resources for the Development Plan Programme are assessed through the Council's budget review process, which will include consultation requirements. Where possible, consultations will be coordinated with other departments, external stakeholders and local communities to make best use of resources.
- 5.3 In addition, as a Development Plan is being prepared particular issues may arise which may require additional community involvement work and the approach needs to be sufficiently flexible to enable this to be incorporated in the Plan preparation process.

6. Monitor and Review

- 6.1 This SCI will be monitored whilst planning documents are being prepared and as planning applications are determined in order to assess its effectiveness. In addition the SCI will be reviewed in response to any future change in regulation or other legislation.

Appendix A - Specific Consultees

Specific consultation bodies are:

- (a) Coal Authority.
- (b) Environment Agency.
- (c) English Heritage.
- (d) Marine Management Organisation.
- (e) Natural England.
- (f) Network Rail Infrastructure Limited.
- (g) Highways Agency.
- (h) A relevant authority any part of whose area is in or adjoins the local planning authority's area (a local planning authority, a county council, a parish council, a local policing body).
- (i) Any person:
 - i. to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003
 - ii. who owns or controls electronic communications apparatus situated in any part of the local planning authority's area
- (j) If it exercises functions in any part of the local planning authority's area:
 - i. a Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section
 - ii. a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989
 - iii. a person to whom a licence has been granted under section 7(2) of the Gas Act 1986
 - iv. a sewerage undertaker
 - v. a water undertaker
- (k) Homes and Communities Agency

Appendix B - General Consultation Bodies

General consultation bodies are:

- (a) Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area.
- (b) Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area.
- (c) Bodies which represent the interests of different religious groups in the local planning authority's area.
- (d) Bodies which represent the interests of disabled persons in the local planning authority's area.
- (e) Bodies which represent the interests of persons carrying on business in the local planning authority's area.

Contacts

Policy

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If you, or someone you know cannot understand English and needs help with this information, or if you would like a large print, Braille, or audio version please call 01452 396396.



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APPENDIX 2 - SCHEDULE OF COMMENTS						
Name	Name	Organisation	Response Id	1. What is the nature of your response?	2. Please set out your views below.	Officer Response
The Guinness Partnership (Ben Cane)	Ben Cane	The Guinness Partnership	378675	Support	In addition to the communication methods already employed I would employ you to consider the use of social media to attract a wider audience. Twitter and Facebook have been a very positive source for signposting recently and may improve the circulation.	Agree. Amend Table 1 of the SCI to include the use of social media as a community involvement method
Retired (Richard Sims)	Richard Sims	Retired	378844	Comment	The number of homes that makes an application significant at 50 is too high should be 25.	This figure is from the Council's adopted scheme of delegation so cannot be altered as a result of SCI comments.
Robert Burns	Robert Burns		378863	Support	This SCI seems to be in good order and finding no objection I give it my approval.	Support noted
Stephen Morgan	Stephen Morgan		378916	Support	I fully support the SCI, but would suggest that other ways of seeking comments are needed. The Hempsted Neighbourhood Plan is a vital first step in reversing the trend which gives landowners and developers almost carte blanche to build on green field sites because these are more profitable than brown field sites. The onus should be on developers to prove that there is a need which cannot be satisfied by brownfield site development.	Support noted. The SCI provides a comprehensive range of community involvement methods for plan making use.
n/a (Samantha Alderman)	Samantha Alderman	n/a	379303	Support	I support the funding for CAB services, as I understand it is means tested and it is now one of the few ways people of moderate means can access legal support, particularly for family cases, following the withdrawal of public funding for most family law cases in April 2013. In my view, decisions taken today for short term political gain, have long term detrimental effects for our children in later life. The CAB also perform a vital role in the housing sector.	Not a response to the SCI - Response to budget consultation.
Gloucestershire Wildlife Trust (Gareth Parry)	Gareth Parry	Gloucestershire Wildlife Trust	379328	Support	My only query is on what determines whether a development requires an Environmental Statement? The proposed criteria for a significant development include submission of an Environmental Statement. My concern is that this will discourage developers from producing an Environmental Statement when it is best practice to do so. There should be set criteria to ensure this does not occur.	The requirements for when an Environmental Statement (ES) needs to be produced are set out in national regulations. It is, therefore, legally set out when it may or may not be necessary to produce an ES.
Chris Hebborn	Chris Hebborn		379517	Comment	In general, I am in support of this document, BUT, I see no mention of the Public Open Space Strategy as being part of the process, which surely it should be. Some wards are below the statutory requirement (Abbey being one) and this should be a special consideration too.	The remit of the SCI is to explain who, when and how the Council will consult on planning applications and on the preparation of development plan documents. The Open Space Strategy is a separate document which provides key evidence to inform the drafting of plan proposals and policies. The gathering of evidence to inform plan preparation is undertaken in most parts during the Regulation 18 stage of plan preparation. The consultation options at this stage are provided in section 3 of the SCI.
John Hughes	John Hughes		379553	Comment	Very concerned that the cultural aspects of the city (Guildhall events and the museum services) were not supported sufficiently well in the previous consultation. Regarding budget planning and like other local authorities, opportunities to improve services (as opposed to cutting them even further) are curtailed by Central Government's determination to control the funds potentially available if the breaks on council taxes could be lifted. Good to see that most want a council tax increase, albeit at 1% for the majority. In my view the only way to restore local services to a level that actually SERVES local residents and businesses is to raise the council tax to 5% or even more. Yes, that means challenging Central Government in a carefully developed strategy refuting the way local budget development is being baulked by the Chancellor. Surely a Conservative-led city council has sufficient standing to push hard for this. The political benefits at local level of appealing against such tight control are obvious, but that may have to be left eventually to another leading political party more in tune with the city's current needs and potential development. Development that has stuttered under the current administration.	Not a response to the SCI - Response to budget consultation.
Stroud District Council (Helen Johnstone)	Helen Johnstone	Stroud District Council	380339	Comment	Introduction - Support Gloucester City Council's commitment to meeting the duty to co-operate and working closely with neighbouring authorities, other partner organisations and stakeholders (para 1.9). Planning Policy Documents - Community Engagement Support the involvement of the Local Strategic Partnership in consultation exercises (Table 1 - Community Involvement Methods, para 2.8). As a general point, the Gloucestershire planning authorities are about to sign a Memorandum of Understanding covering strategic planning matters, including additional commitments with regard to engagement and co-operation. The final Statement of Community Involvement could make reference to that document.	Support noted on Duty to Cooperate and involvement of the Local Strategic Partnership. Agree that the SCI be amended to reflect the consultation arrangements included within the Gloucestershire Memorandum of Understanding, an officer agreed document.
David Brown	David Brown		391508	Support	Generally agree with the statement. I would encourage planning applicants to follow 4.16 / 4.17 / 4.18. This can be beneficial to all parties and in my experience works to everyone's advantage and makes progress of applications more smooth.	Comment noted
Office of Rail Regulation	Sir / Madam	Office of Rail Regulation	391510	Comment	Thank you for consulting ORR on the above Statement of Community Involvement. The Office of Rail Regulation has no comment to make on this particular document.	Comment noted

Persimmon Homes Severn Valley (Steven Kerry)	Steven Kerry	Persimmon Homes Severn Valley	391516	Comment	<p>Introduction, para. 1.4 Clarification on 'The Regulations', what regulations? We find Table 1; Community Involvement Methods to be very useful and accurately describes the main factors associated with each method, both positive and negative. P8, Development Plan Documents (DPDs) Para. 2.13 Repetition of 'a' before and after the word 'receiving' Figure 1: Development Plan Document Preparation Stages Stage 1 Typo (preparation). Although present in Section 3, recommend adding a reference to Neighbourhood Plans after SPDs in Section 2 as they also govern community engagement processes. Agree with the process undertaken in para. 4.6, as planning applications can only be refused on planning grounds the list of material considerations can be used as a filtering system for any objections relating to personal reasons. Para. 4.16 Add 'In the form of a Statement of Community Involvement' . . . Para. 4.18 We note reference to charges for pre application discussions, we would welcome clarification on what that cost would be. Overall we feel that the GCC SCI is a thorough and concise representation of the consultation processes for development plans and the submission of the planning applications, and subject to the proposed amendments above we support the SCI document.</p>	<p>Footnote 1 at para 1.1 of the SCI provides details of the statutory requirement for the preparation of the document. It also refers to the Town and Country Planning (Local Planning)(England) Regulations 2012 as being the relevant regulations. In terms of delivering a user friendly public document these references have been kept out of the main text and referred to as a footnote. To assist with the point raised a further footnote will be added at para 1.4 to refer again to the 2012 regulations. Para 2.13 - Amend plan as suggested Figure 1 - Amend plan as suggested Stage 1 - Amend plan as suggested Section 3 - Amend text. Move section 3 Neighbourhood Plans to follow on from section 2.17. as suggested. Para 4.16 - As the Council can only request this to occur, we cannot specify how it is formatted. Para 4.18 - The process and charges for pre application matters is set out on the Council's website. General Support noted.</p>
Network Rail (Barbara Morgan)	Barbara Morgan	Network Rail	391521	Comment	<p>Dear Sir/Madam Network Rail has been consulted by Gloucester City Council on the Statement of Community Involvement consultation. Thank you for providing us with this opportunity to comment on this Planning Policy document. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy and determination of relevant planning applications is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, we are pleased to see Network Rail listed as a specific consultee. Developer Contributions The development plan policy should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is include the following: A requirement for development contributions to deliver improvements to the rail network where appropriate. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.</p> <p>Level Crossings Development proposals; affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that: Gloucester City Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that; Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway Town Planning, Network Rail, 3rd Floor, TemplePoint, Re</p>	<p>Support noted. Reference to Developer Contributions is not an issue for the SCI. This is a matter for the Infrastructure Development Plan (IDP) and the Community Infrastructure Levy (CIL). Consultation requirements (including new wider requirements) with Network Rail are set out in the Town and Country Planning (Development Management Procedure)(England)Order 2015.</p>

					<p>(public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.</p> <p>Planning Applications</p> <p>We would appreciate Gloucester City Council providing Network Rail with an opportunity to comment on any future planning applications or proposed site allocations should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).</p> <p>Contact should be made to Network Rail's Town Planning Team for review and comment. All initial proposals should be sent to Network Rail Town Planning Team at the following address:- Town Planning, Network Rail, 3rd Floor, TemplePoint, Re(public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval.</p> <p>Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.</p> <p>Planning Applications</p> <p>We would appreciate Gloucester City Council providing Network Rail with an opportunity to</p>	
					<p>comment on any future planning applications or proposed site allocations should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above). Contact should be made to Network Rail's Town Planning Team for review and comment.</p>	

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