



# Gloucester City Council

## Planning Policy Sub Committee

**Meeting: Thursday, 17th November 2016 at 6.00 pm in the Civic Suite,  
North Warehouse, The Docks, Gloucester, GL1 2EP**

<b>Membership:</b>	Cllrs. Taylor (Chair), Lewis (Vice-Chair), Lugg, D. Brown and Dee
<b>Contact:</b>	Tony Wisdom Democratic Services Officer 01452 396158 anthony.wisdom@gloucester.gov.uk

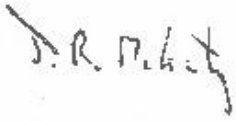
### AGENDA

<b>1.</b>	<b>APOLOGIES</b>  To receive any apologies for absence.
<b>2.</b>	<b>DECLARATIONS OF INTEREST</b>  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.
<b>3.</b>	<b>PUBLIC QUESTION TIME</b>  To receive any questions from members of the public provided that a question does not relate to: <ul style="list-style-type: none"><li>• Matters which are the subject of current or pending legal proceedings, or</li><li>• Matters relating to employees or former employees of the Council or comments in respect of individual Council Officers</li></ul>
<b>4.</b>	<b>PETITIONS AND DEPUTATIONS</b>  To receive any petitions and deputations provided that no petition or deputation is in relation to: <ul style="list-style-type: none"><li>• Matters relating to individual Council Officers, or</li><li>• Matters relating to current or pending legal proceedings</li></ul>
<b>5.</b>	<b>MINUTES</b> (Pages 5 - 8)  To approve as a correct record the minutes of the meeting held on 15 September 2016.
<b>6.</b>	<b>DRAFT GLOUCESTER CITY PLAN - PUBLIC CONSULTATION</b> (Pages 9 - 164)  To consider the report of the Cabinet Member for Housing and Planning which seeks approval from Members to publish the Draft Gloucester City Plan for a six week period of public consultation.

7.

**DATE OF NEXT MEETING**

Thursday, 16 March 2017 at 6.00pm



**Jon McGinty**  
**Managing Director**

**Date of Publication: Wednesday, 9 November 2016**

## 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](http://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](mailto: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](mailto: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.

### **Recording of meetings**

Please be aware that meetings may be recorded. There is no requirement for those wishing to record proceedings to notify the Council in advance; however, as a courtesy, anyone wishing to do so is advised to make the Chair aware before the meeting starts.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the Public and Press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

### **FIRE / EMERGENCY EVACUATION PROCEDURE**

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, 15th September 2016

**PRESENT** : Cllrs. Taylor (Chair), Lewis (Vice-Chair), Lugg, D. Brown and Dee

**Officers**

Anthony Wilson, Head of Planning  
Shona Robson-Gyde, Historic Environment Officer  
Matt Haslam, Urban Design Officer  
Tony Wisdom, Democratic Services Officer

**APOLOGIES** : None.

**1. DECLARATIONS OF INTEREST**

No declarations were made on this occasion.

**2. MINUTES**

The minutes of the meeting held on 17 March 2016 were confirmed and signed by the Chair as a correct record.

**3. PUBLIC QUESTION TIME**

There were no questions from members of the public.

**4. PETITIONS AND DEPUTATIONS**

There were no petitions or deputations.

**5. SHOPFRONTS, SHUTTERS AND SIGNAGE - DESIGN GUIDELINES FOR GLOUCESTER AND PUBLIC REALM STRATEGY DRAFTS FOR CONSULTATION**

The Urban Design Officer presented the report of the Head of Planning which sought approval for consultation purposes of the draft Shopfronts, Shutters and Signage – Design Guidelines for Gloucester.

The Head of Planning advised that the draft Public Realm Strategy had been withdrawn from the agenda and would be presented to a future meeting.

**PLANNING POLICY SUB COMMITTEE**  
**15.09.16**

The Urban Design Officer reported that the document was an updated version of one which had been first produced over twenty years previously and contained advice on general principles and guidance with examples of good and bad design.

The Vice-Chair suggested that a copy be sent to all the bad examples of shopfronts particularly in the Gate Streets.

The Head of Planning advised that the document would form part of the evidence base for the City Plan. He would give some consideration to producing a leaflet for door to door circulation in the city centre in consultation with the Chair.

Another Member noted that Eastgate and Barton Streets seemed particularly vulnerable to poorly designed shopfronts.

The Vice-Chair questioned the cost of the preferred design principles and the Head of Planning noted that quality construction would last longer than poor work.

**RESOLVED TO RECOMMEND to Cabinet** that the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester be approved for a six week period of public consultation.

**6. ENDORSEMENT OF STRATEGIC ASSESSMENT OF LAND AVAILABILITY REPORTS**

The Historic Environment Officer presented the report which invited the Sub-Committee to endorse a number of Strategic Assessment of Land Availability (SALA) site assessment reports.

She advised that the SALA formed part of the evidence base for the preparation of the Gloucester City Plan. As part of the site allocation process for the City Plan a number of sites were identified as having the potential to be allocated for housing or employment uses. Following Officer consultation, a total of 37 sites will be subject to an historic environment assessment to ensure that the SALA and subsequently the City Plan is based on adequate, up-to-date and relevant evidence with regard to the historic environment in accordance with paragraph 158 of the National Planning Policy Framework.

**RESOLVED** that the following historic environment assessment reports be endorsed:

EA06 Land south of Eastern Ave and Barnwood Rd junction

FS05 Former Royal Mail Distribution Centre

FS15 Redcliffe College, Horton Road

SUB12 Saintbridge House, Painswick Road

SUB22 Land south of Hempsted

SUB29 Hare Lane Car Park

SUB33 Land at Snow Capel Farm

SUB40 The Knoll, Stroud Road

**PLANNING POLICY SUB COMMITTEE  
15.09.16**

SUB44 Land south of Grange Road

SUB54 Land at Rea Lane

SUB58 30 St Catherine Street

SUB59 9-11 St Catherine Street

**7. DATE OF NEXT MEETING**

Thursday, 17 November 2016 at 6:00 pm.

**Time of commencement: 6.00 pm**

**Time of conclusion: 6.50 pm**

**Chair**

**This page is intentionally left blank**





<b>Meeting:</b>	<b>Planning Policy Sub-Committee Council</b>	<b>Date:</b>	<b>17 November 2016 1 December 2016</b>
<b>Subject:</b>	<b>Draft Gloucester City Plan – Public Consultation</b>		
<b>Report Of:</b>	<b>Cabinet Member for Housing and Planning</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>Yes</b>
<b>Contact Officer:</b>	<b>Adam Gooch, Principal Planning Officer</b>		
	<b>Email: adam.gooch@gloucester.gov.uk</b>	<b>Tel: 39-6836</b>	
	<b>Anthony Wilson, Planning Services Manager</b>		
	<b>Email: anthony.wilson@gloucester.gov.uk</b>	<b>Tel: 39-6830</b>	
<b>Appendices:</b>	<ol style="list-style-type: none"> <li><b>1. Draft Gloucester City Plan, including proposals maps and proposed site allocations map</b></li> <li><b>2. City Plan Part 1 – Response Report</b></li> <li><b>3. Sustainability Appraisal – Non-Technical Summary</b></li> <li><b>4. Consultation Plan</b></li> </ol>		

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

1.1 To seek approval from Members to publish the Draft Gloucester City Plan for a six-week period of public consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**2.0 Recommendations**

2.1 Planning Policy is asked to **RECOMMEND** that Council:

- (1) approve the Draft Gloucester City Plan for the purposes of a six-week period of public consultation (Appendix 1).
- (2) note the representations made to the City Plan Part 1 during the public consultation period (Appendix 2); and
- (3) endorse the resulting officer responses set out within the response schedule (Appendix 2).
- (4) delegate authority to the Managing Director of the Council in consultation with the relevant Leaders of the Council to make minor changes to the draft City Plan and Proposals Map in terms of formatting, presentation and accuracy, including any minor changes following the considerations at

Planning Policy Sub-committee and Council, prior to publication for public consultation purposes.

2.2 Council is asked to **RESOLVE** to:

- (5) approve the Draft Gloucester City Plan for the purposes of a six-week period of public consultation (Appendix 1).
- (6) note the representations made to the City Plan Part 1 during the public consultation period (Appendix 2); and
- (7) endorse the resulting officer responses set out within the response schedule (Appendix 2).
- (8) delegate authority to the Managing Director of the Council in consultation with the relevant Leaders of the Council to make minor changes to the draft City Plan and Proposals Map in terms of formatting, presentation and accuracy, including any minor changes following the considerations at Planning Policy Sub-committee and Council, prior to publication for public consultation purposes.

### **3.0 Background and Key Issues**

3.1 The emerging Local Plan for Gloucester consists of two inter-related documents. The first is the Joint Core Strategy (JCS), which covers the administrative areas of Gloucester City, Cheltenham Borough and Tewkesbury Borough, between 2011 and 2031. It sets out strategic level planning policy, such as defining the housing requirement, strategic site allocations and high level development management policies on areas such as affordable housing, landscape and retail. The JCS has now reached an advanced stage in preparation.

3.2 The second document is the Gloucester City Plan (GCP). This covers the administrative area of Gloucester only, and will provide locally specific site allocations and development management policies, set within the strategic context of the JCS. The plan will cover the period 2016 to 2031.

#### **What's happened so far?**

3.3 To date there have been several consultations on the GCP, but the timetable has always been staggered behind the JCS given that it is the higher level plan and the City Plan needs to be in general conformity. The public consultations held on the GCP to date have been:

- Scope – looking at the key areas for the plan to address (October 2011).
- Part 1 – setting out the context and key principles (February 2012).
- Part 2 – a consultation on potential site allocation opportunities and a draft City Centre Strategy (May 2013).

3.4 There have now been two periods of Member engagement to feed into the evolution of the GCP. The first was held in January 2015 and more recently two sessions were held in October 2016. The feedback from these sessions has been used to inform the current draft.

## **How has the Draft Gloucester City Plan been prepared and what does it contain?**

- 3.5 The Draft GCP is prepared in the context of the JCS, which provides the strategic context. It is the job of the GCP to deliver the overall strategy and objectives of the JCS at the local level, but also to provide site allocations and development management policies that reflect and address the local issues and opportunities in the City.
- 3.6 The Draft GCP consultation includes a locally specific Vision and set of Key Principles, which have been prepared having regard to the JCS, the Council's adopted City Vision and Council Plan and responses made to previous public consultations.
- 3.7 The Draft Plan includes 23 proposed site allocations. These are sites that have been assessed through the Council's Strategic Assessment of Land Availability (SALA) process and found to be suitable, available and achievable. The proposed allocations are also informed by a range of different evidence documents, for example biodiversity and heritage assessments. Some evidence studies are continuing and are programmed for completion in spring 2017, well in advance of the next stage of the process, Pre-Submission.
- 3.8 Given the relatively small number of suitable sites and the limited availability of land in the City when considered against development needs, this consultation is also being used as a targeted 'call for sites'. This is where the community, landowners and developers are actively encouraged to submit sites to the Council, which will then be assessed through the SALA process. If appropriate, these sites will then be considered for inclusion as site allocations at the next stage of the Plan process.
- 3.9 The Draft Plan also includes 70 development management policies covering a wide range of issues such as the type of new homes that the City needs, the protection of important heritage assets and policies to support the growth of Gloucester's economy. These are policies that, once adopted, will be used to determine planning applications. These sit alongside the policies to be adopted by the Council as part of the JCS, collectively providing the Local Development Plan for the City. It is only necessary for the GCP to have a policy where it is not provided through the JCS (either partly or at all) and required locally in the City. The GCP must add to and not repeat JCS policy or national planning policy / guidance.
- 3.10 The content of the GCP has all been subject to a rigorous 'Integrated Appraisal' (IA) process. This incorporates the Council's statutory responsibility with regard to Sustainability Appraisal (SA) and Equalities Impact Assessment (EqIA). It also incorporates Health Impact Assessment (HIA) which, whilst not a statutory requirement, is considered best practice. IA is an iterative process and aims to ensure that all policies and proposals are the most sustainable possible options based on a thorough understanding of the social, economic and environmental characteristics of the area. For the purposes of this report the IA 'Non-Technical Summary' is provided at Appendix 3.

## **Public consultation**

- 3.11 The next step in the journey of the GCP is to hold a public consultation on the contents of the Draft Plan. Officers will undertake a thorough public consultation that satisfies both planning regulations and the Council's adopted Statement of Community Involvement (July 2015). It will include: a comprehensive online presence (City Council website and social media notifications); publication of articles in the local press; electronic or hard copy notification to all stakeholders held on the planning policy consultation database; and targeted consultation events in particular localities and with certain communities. Further details can be found in Appendix 4 – Consultation Plan.

## **4.0 Asset Based Community Development (ABCD) Considerations**

- 4.1 The City Plan is a document that can be used by all members of the Gloucester community on an 'as needed' basis. Its policies will provide the context for the promotion of ABCD initiatives across the City.

## **5.0 Alternative Options Considered**

- 5.1 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. Therefore, given the statutory nature of the process there are no viable alternatives to be considered.

## **6.0 Reasons for Recommendations**

- 6.1 To enable the progression of the City Plan and to ensure the Council is meeting its statutory duty to maintain an up to date development plan.
- 6.2 Regulation 18 (3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 require Local Planning Authorities to demonstrate evidence of participation in the plan making process. This is achieved through the production and endorsement of a response report at each stage of the process.
- 6.3 Delegated authority is requested for minor amendments to ensure that the plan making process makes best use of officer and member resources. This will also ensure that the City Plan can be amended to reflect any approved changes that occur as part of the on-going JCS process.

## **7.0 Future Work and Conclusions**

- 7.1 Once the Draft GCP consultation has been completed, officers will prepare the Pre-Submission version of the Plan. This will be informed by consultation responses received as well as new evidence that has been completed. The Pre-Submission consultation of the GCP is timetabled to be held in summer 2017. This will then be followed by submission to the Planning Inspectorate in autumn 2017, followed by Examination in Public (dates yet to be determined).

## **8.0 Financial Implications**

- 8.1 For the purposes of this public consultation, the only resource implication is officer time in preparation, undertaking and completing the consultation process.
- 8.2 After this, further officer resources will be required to prepare and consult on the Pre-Submission version of the GCP, followed by its submission to the Planning Inspectorate and subsequent Examination in Public. During this time, there will also be the need for the completion of further evidence base studies and the purchase of a licence for the continued use of the Council's dedicated planning consultation software. The resource requirements for these have been factored into existing budgets.

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

## **9.0 Legal Implications**

- 9.1 The Council is required to have an up to date development plan, the lack of such a plan would mean that the Council's future planning decisions could be open to challenge by applicants and third parties if they are not based upon an up to date planning framework.

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

## **10.0 Risk & Opportunity Management Implications**

- 10.1 The progression and adoption of the GCP will, together with the JCS, provide a robust development plan that will be a major material consideration in the determination of planning applications in the City. The lack of a Plan would mean the Council would have to rely on outdated local development plan policies and the use of the JCS, National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The existence of up-to-date planning policies will better reflect local circumstances and also reduce the risk of adverse costs awards in planning appeals.

## **11.0 People Impact Assessment (PIA):**

- 11.1 All draft policies proposed through this plan will have been subject to an 'Integrated Assessment'. This satisfies the City Council's statutory responsibilities with regard to Sustainability Appraisal (including Strategic Environmental Assessment) and Equalities Impact Assessment. It also incorporates Health Impact Assessment which is not a statutory requirement but considered best practice.
- 11.2 Integrated Assessment is an iterative process and policy proposals have been assessed and amended on an ongoing basis to ensure they are as sustainable as possible, in the context of national requirements and local characteristics. This includes making sure that the policies and proposals of the City Plan would not affect a particular group differently in either a positive or negative way.
- 11.3 A summary of the findings is provided as part of the 'Non-Technical Summary' at Appendix 3.

11.2 In addition, the PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

## **12.0 Other Corporate Implications**

### Community Safety

12.1 None.

### Sustainability

12.2 Once adopted the GCP along with the JCS will provide the planning framework for the City that will be used to inform the assessment of planning applications and investment decisions. Both the JCS and GCP have been subject to Integrated Assessment on an ongoing basis and the strategy put forward represents the most sustainable approach for the City and Gloucestershire more widely.

### Staffing & Trade Union

12.3 None/

**Background Documents:** None.

**DRAFT  
GLOUCESTER CITY PLAN**

**2016 – 2031**

**October 2016**

**Version 10**





**CONTENTS**

- 1.0 Introduction and overview**
- 2.0 Planning positively for the future of Gloucester**
- 3.0 Development Management Policies**
  - A Housing**
  - B Employment**
  - C Retail and City / Town Centres**
  - D Health and Wellbeing**
  - E Historic Environment**
  - F Natural Environment**
  - G Design**
  - H Sustainable Transport**
  - I Infrastructure**
- 4.0 Proposed land allocations**
- 5.0 Delivery, monitoring and review**

**Proposals map**

**Central area inset**

**Appendices**

**Glossary**

## Policy Index

### A: Housing

- Policy A1: Use of upper floors for residential
- Policy A2: Regeneration of neighbourhoods
- Policy A3: Sub-division of plots for infill
- Policy A4: Intensification of use of existing dwellings
- Policy A5: Housing mix
- Policy A5: Student housing
- Policy A6: Housing choice for older people and supported and special needs housing
- Policy A7: Self build
- Policy A8: Static caravan sites
- Policy A9: Extensions to existing dwellings
- Policy A10: Annexes to existing dwellings

### B: Economic Development

- B1: Employment & Skills Plans
- B2: Existing Employment Sites
- B3: New Employment Sites
- B4: Existing Employment Space
- B5: New Employment Space

### C: Retail and the City Centre

- Policy C1: Maintaining the vitality and viability of city, district and local centres
- Policy C2: Proposals located within the City Centre boundary, Primary Shopping Area, primary frontages and secondary frontages
- Policy C3: Visitor attractions
- Policy C4: Overnight accommodation
- Policy C5: Major cultural venue
- Policy C6: Evening and night-time uses

### D: Health and wellbeing

- Policy D1: Active design
- Policy D2: Outdoor space
- Policy D3: Accessibility
- Policy D4: Allotments
- Policy D5: Open space
- Policy D6: Provision of playing pitches in new development
- Policy D7: Protection of open space and playing fields
- Policy D8: Community facilities
- Policy D9: Mobile catering nits
- Policy D10: Air quality
- Policy D11: Noise
- Policy D12: Pollution
- Policy D13: Contamination
- Policy D14: Cordon sanitaire
- Policy D15: Suicide prevention

### E: Historic Environment

- Policy E1: Historic environment development management
- Policy E2: Recording and advancing understanding of heritage assets
- Policy E3: Buildings of local importance
- Policy E4: Shopfronts, shutters and signs

### F: Natural Environment

- Policy F1: Landscape

Policy F2: Biodiversity  
 Policy F3: Nature Improvement Area  
 Policy F4: Trees and hedgerows  
 Policy F5: Green Infrastructure  
 Policy F6: Geodiversity  
 Policy F7: Flooding  
 Policy F8: Potential of River and Canal  
 Policy F9: Efficiency measures  
 Policy F10: Mitigation through planting and SUDs

**G: Design**

Policy G1: Living conditions  
 Policy G2: Car parking  
 Policy G3: Materials and finishes  
 Policy G4: Landscape  
 Policy G5: Bin storage  
 Policy G6: Cycle parking and storage  
 Policy G7: Public realm  
 Policy G8: Public art  
 Policy G9: Community safety  
 Policy G10: Delivering strategies  
 Policy G11: Development alongside main routes  
 Policy G12: Design standards  
 Policy G13: Large scale 20<sup>th</sup> century buildings  
 Policy G14: Transport arrival nodes  
 Policy G15: Gulls  
 Policy G16: Design and climate change  
 Policy G17: Views of the Cathedral

**H: Sustainable transport**

Policy H1: Sustainable transport

**I: Infrastructure**

Policy I1: Infrastructure  
 Policy I2: Schools and Other Education Needs

**Proposed site allocations**

SA01: Land at the Wheatridge  
 SA02: Barnwood Manor  
 SA03: Gloucester Mail Centre, Eastern Avenue  
 SA04: Helipebs, Sisson Road  
 SA05: Allstone site, Myers Road  
 SA06: Former Civil Service Club  
 SA07: 67 – 69 London Road  
 SA08: Wessex House  
 SA09: Great Western Road sidings  
 SA10: Land off Leven Close  
 SA11: Land adjacent to St Aldates  
 SA12: Blackbridge Sports Hub  
 SA13: Land East of Waterwells Business Park  
 SA14: Land at Clearwater Drive  
 SA15: King's Quarter  
 SA16: Greater Blackfriars  
 SA17: Southgate Moorings

SA18: 104 Northgate Street  
SA19: Land adjacent to Eastgate Shopping Centre  
SA20: Land at St Oswalds  
SA21: Former Town Ham Allotments  
SA22: Secunda Way Industrial Estate  
SA23: Land at Rea Lane

**1.0 Introduction and Overview**

- 1.1 Gloucester is a transforming and growing City and these are exciting times. Together with the Joint Core Strategy, the Gloucester City Plan will continue Gloucester's regeneration journey by providing the development framework to guide the City's future growth up to 2031.
- 1.2 This is the draft Gloucester City Plan. It brings together previous consultations and for the first time presents the plan in its entirety and your views are sought on this. The Plan provides a range of locally specific development management policies and proposed site allocations.
- 1.3 This stage in the process also represents a further opportunity for sites to be submitted to the City Council for consideration as development opportunities. See section 1.25 for more information on how to do this.
- 1.4 The consultation is published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

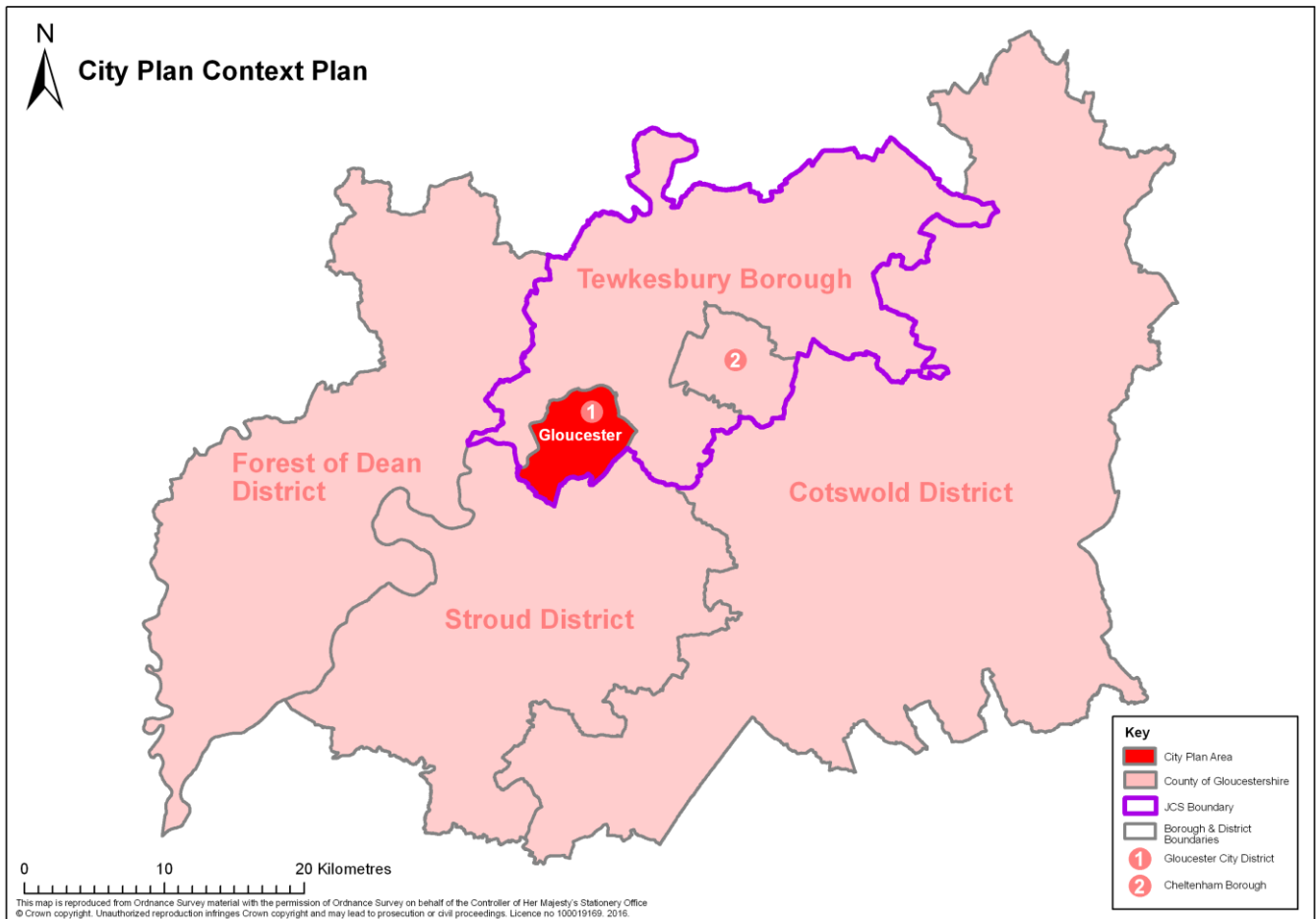
**What is the City Plan?**

- 1.5 The main aim of the Gloucester City Plan is to identify where and how new development will take place within the City's administrative boundary to deliver the City Vision and to deliver the housing and employment requirements set out in the Joint Core Strategy. It will also provide a framework for managing and enhancing the City's historic and natural environment including open spaces, areas of recreation, leisure and environmental protection. It is important that the Plan works towards delivering the benefits associated with a growing City and supports its ongoing regeneration.

**Why do we need a City Plan?**

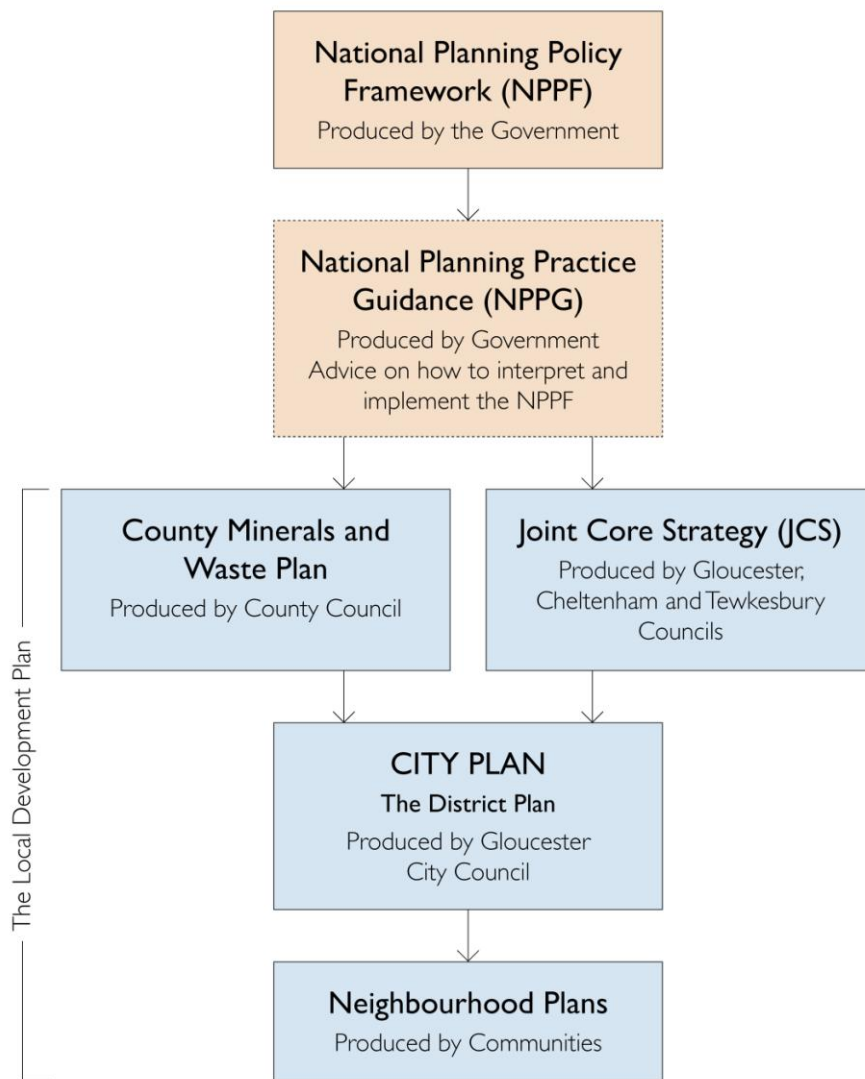
- 1.6 The Government requires Councils to prepare a Local Plan for their areas, covering a timeframe of at least 15 years. Local Plans are key to delivering sustainable development and in setting out the strategic priorities of an area. They should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. It's important the Council has in place an adopted plan as it means development decisions can be made in a coordinated way that gets the best possible results for the community and gives certainty to developers.
- 1.7 The Local Plan also acts as a mechanism for delivering elements of the wider priorities, strategies and plans of the Council and its partners. This includes for example the Council's adopted Gloucester Regeneration and Economic Development Strategy and Cultural Strategy, as well as the Local Enterprise Partnership's Strategic Economic Plan and the County Council's Health and Wellbeing Strategy.
- 1.7 The Local Plan for Gloucester will consist of two separate but interrelated documents. The first is the Joint Core Strategy (JCS), which is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The JCS sets the strategic planning framework for the three Councils and addresses issues such as housing and employment requirements, large land allocations and a range of high level development management policies.
- 1.8 Beneath this is the Gloucester City Plan (GCP). The GCP covers the administrative area of Gloucester City only and provides a range of locally specific land allocations for different types of development and a suite of development management policies.
- 1.9 Together they will provide an up-to-date and comprehensive planning policy framework and will replace the Council's adopted Local Plan from 1983 and interim versions of plans thereafter, including the 2002 plan that is used for development management purposes today. It will also take forward more recent policies that have been adopted by the Council as interim policy positions. Once adopted, the GCP will be used to assess planning applications and ensure that development

proposals contribute to delivering new development that positively contributes to delivering the vision for Gloucester.



***The wider context***

1.10 It is important that the GCP is consistent with the objectives and principles of both the JCS and national planning policy – this is set out in the National Planning Policy Framework (NPPF) and supported by the national Planning Practice Guidance (PPG).



- All used to make planning decisions and inform plan making
- A tiered system where the information from the top flows all the way through all levels of plan making.

02/08/16 10:14

1.11 The City Plan supports the delivery of the JCS and must accord with the objectives and policies within it. At the time of writing the JCS has reached an advanced stage of preparation and it moving towards the end of the ‘Examination in Public’. The plan was ‘submitted’ to the Planning Inspectorate in November 2015 and there have been a number of hearing sessions on a whole range of topics. The Inspector’s ‘Interim Findings’ were received in May 2016 and work is continuing on the ‘Main Modifications’ – these are changes to the plan the Inspector feels are necessary before it can be found ‘sound’ and adopted by the three Councils.

***What does the JCS say?***

1.12 The JCS partnership was set up to positively address the development needs for Gloucester, Cheltenham and Tewkesbury local authority areas. This is because the full development needs of

Gloucester and Cheltenham could not be provided for within their own administrative boundaries, and so the decision was taken for the three Councils to work positively and constructively in addressing these needs. There is also a functional relationship between the three authority areas, together forming the main economic drivers for Gloucestershire.

- 1.13 The JCS strategy seeks to locate as much development as possible in and around the main settlements of Gloucester, Cheltenham and Tewkesbury. This is the most sustainable approach, allowing new communities to integrate with existing, and benefit from existing and enhanced access to jobs, services, transport networks and community and green infrastructure.
- 1.14 For Gloucester City, the JCS sets out a need for 14,350 new homes and for the whole of the JCS area a need for 192 hectares of 'B' Class employment land and a minimum of 39,500 additional jobs between 2011 and 2031. In addition, the JCS sets out an overall forecast of approximately 45,000 sq m (net) of retail floorspace for the City between 2016 and 2031. A significant amount of Gloucester's development needs will be provided outside of the administrative boundary of the City at the 'strategic allocations' of land to the north and east of the City. In addition to this, a large proportion will also come from sites located within the boundary of Gloucester City.

### **Evidence base**

- 1.15 It is very important that the City Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 1.16 A large number of evidence studies have been completed as part of the JCS process and are directly relevant to the GCP. This includes for example the Housing Needs Assessment, Retail Study, Economic Forecast, Infrastructure Delivery Plan, Green Infrastructure Strategy and Landscape Characterisation Assessment & Sensitivity Analysis.
- 1.17 However, some of this evidence is not locally specific enough to fully consider the issues relevant to Gloucester City and for this reason other important studies have been completed and include for example a Playing Pitch Strategy and a number of site specific heritage assessments.
- 1.18 At the time of writing there are also a number of studies that are outstanding and are either currently being undertaken or will be prepared or commissioned shortly. These are currently evidence base gaps and will be reviewed and applied to policy in time for the next stage in the plan-making process. Outstanding evidence base studies include:
- Economic Development Strategy
  - Strategic Flood Risk Assessment (Level 2)
  - Parking Strategy
  - Townscape Character Assessment
  - Historic Environment Assessments – for some remaining sites
  - Transport Assessment and Modelling
  - Infrastructure Delivery Plan
  - Biodiversity Assessments – for some remaining sites
- 1.19 A 'Topic Paper' has been prepared which set out in detail the background behind each of the policy topic areas. They set out the relevant evidence that underpins that topic area, the relationship and context with regard to the NPPF, JCS and other key plans and strategies, and commentary on what we have been told through previous consultations. 'Ward profiles' have also been prepared, which provide a detailed analysis of the strengths and opportunities facing each area of the City.
- 1.20 All existing evidence base studies can be downloaded from the GCP homepage at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan).



## Sustainability Appraisal

- 1.21 Every Local Plan must be informed and accompanied by a Sustainability Appraisal (SA). This allows the potential environmental, economic and social impacts of the proposal to be systematically taken into account. The SA plays an important part in demonstrating that plans reflect sustainability objectives and ensures that the best possible options are being taken forward.
- 1.22 The SA incorporates Strategic Environment Assessment, Habitats Regulations Assessment and Equality Impact Assessment, all of which are European Union requirements. It also incorporates Health Impact Assessment which, whilst not a statutory requirement, is a priority for the City Council. Together, they are referred to as an 'Integrated Assessment' (IA).
- 1.23 Integrated Assessment is an iterative process and emerging policies have been amended as a result of the assessment process. This process will be ongoing as the City Plan progresses and will factor in consultation comments and new evidence.
- 1.24 The full Integrated Assessment report as well as a range of background information is available to download at the GCP homepage at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan).

## Call for sites

- 1.25 This consultation document sets out a range of potential site allocations for the City. However, given the constrained nature of Gloucester's administrative area, the City Council is interested to hear of any other potential development sites that may exist. These will then be factored into the next iteration of the Council's Strategic Assessment of Land Availability. We ask that when a site is submitted for consideration, it is accompanied with a completed proforma, which is available to download from the City Council's website.

## Duty to Cooperate

- 1.26 Under the Localism Act 2011, local authorities are required to take a lead in strategic planning and tackle issues that impact on a 'larger than local' area and cut across administrative areas. The JCS was taken forward on this principle, with the three authorities working constructively and positively to address the strategic needs of the authorities.
- 1.27 The City Council is continually working together with neighbouring authorities and other organisations to ensure that matters of a strategic nature are properly considered and addressed, within the context of the 'Duty to Cooperate'. To formalise this relationship, each of the Gloucestershire district Councils has signed up to a 'Memorandum of Understanding', which sets out when and how they will 'cooperate' on strategic planning matters – this document is available to download from the City Council's website.

## What's happened so far?

- 1.28 The City Council has already written and consulted on three parts of the City Plan. These are:
- **The Scope (2011):** The 'Scope' set out the context of the City Plan and the key issues for Gloucester. It sought views on types of planning policies that should be included in the plan and the areas that should be identified for development or protection.
  - **City Plan Part 1 (2012):** Part 1 took the Scope further, setting out in more detail the issues that Gloucester faces and sets out 13 'key principles' that the City Plan would seek to deliver.
  - **City Plan Part 2 - Places, Sites, City Centre Strategy (2013):** Part 2 focused on the development needs of the City and started looking at potential site allocations as well as a draft City Centre strategy, including for example a proposed Primary Shopping Area.

- 1.29 At each stage comments from local residents, businesses, organisations and national bodies were sought and their views reported in a response report. All of the comments made on the plan so far, and copies of the various response reports, can be found at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan).

**What will happen next?**

- 1.30 This document will be subject to a 6 week public consultation running from XXXXXXX until XXXXXXX. The consultation will be carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.31 The responses to the consultation will be collated and considered by officers, and where appropriate the policies will be amended. The Plan will be reworked to form the 'Pre-Submission City Plan'. This will be subject to one further round of public consultation before it is submitted to the Planning Inspectorate. This will then be subject to an Examination in Public before it can be adopted by the Council. The timetable for this is as follows:
- Pre-Submission consultation – Summer 2017
  - Submission to the Planning Inspectorate – Autumn 2017

**How do I make comments?**

- 1.32 An electronic response form is available on the City Plan webpage at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan).
- 1.33 There is also a downloadable MS Word version of this form that can be completed and emailed to [spatialplanning@gloucester.gov.uk](mailto:spatialplanning@gloucester.gov.uk). Hard copies should be posted to:

Planning Policy and Heritage Team  
Gloucester City Council  
Herbert Warehouse  
The Docks  
Gloucester  
GL1 2EQ

- 1.34 Hard copies of the consultation document have also been made available at the City Council offices, all Gloucester libraries, the Guildhall and the Tourist Information Centre.
- 1.35 If you have any difficulties in making a response please contact a member of the team on 01452 396825.

**Structure of this document**

- 1.36 The GCP is structured as follows:
- Section 2 sets out an overview of 'Gloucester today, Gloucester tomorrow';
  - Section 3 sets out a range of draft development management policies, arranged by key theme. A summary sheet, taken from the topic papers, provides an overview for each of the themes;
  - Section 4 sets out all proposed site allocations in the City;
  - Section 5 sets out information in relation to the delivery, monitoring and review of the plan; and
  - Section 6 provides a glossary of all of the technical planning terms that have to be used in this plan.
- 1.37 In addition, the following maps have been prepared:

- Key diagram: this shows the strategic context of the City Plan.
- Proposals map: this relates directly back to the development management policies, showing the areas / locations to which the designations and constraints apply. Given the extent of these within the City Centre, a 'central area inset' is also provided; and
- Development map: this shows the location of the proposed allocations identified at section 4, as well as the location of all existing sites with planning permission for different types of development.

## 2.0 Planning positively for the future of Gloucester

- 2.1 The starting point in preparing the draft City Plan for Gloucester is the Joint Core Strategy (JCS). This plan is based on the partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The JCS provides an overarching planning framework for the three local authorities that their respective district plans must deliver at the local level. The City Plan must be consistent with the JCS as well as providing more specific policies to deliver local issues.
- 2.2 The JCS has been prepared on the basis of a significant amount of evidence and sets out detailed aims, objectives and an overarching strategy based on a thorough understanding of the issues, challenges and aspirations for the different areas. The aims, objectives and strategy seek to deliver the adopted community strategy for each of the local authorities and has been prepared with a thorough understanding of key challenges and characteristics. For Gloucester City, the adopted community strategy is the City Vision 'A City ambitious for its future and proud of its past' 2012 – 2022 (see below for more information).

### **Joint Core Strategy Vision – 2011 to 2031**

*By 2031 Gloucester City, Cheltenham Borough and Tewkesbury Borough will have continued to develop as highly attractive and accessible places in which to live, work and socialise.*

*The Joint Core Strategy area will be recognised nationally as enjoying a vibrant, competitive economy with increased job opportunities and a strong reputation for being an attractive place in which to invest.*

*The character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of young families, single people and the elderly.*

*New developments will have been built to the highest possible standards of design and focused on protecting the quality and distinctiveness of each community.*

*Established in sustainable locations, without increasing the risk of flooding, they will have been designed with sensitivity towards existing villages, towns and cities and with respect for the natural and built environment.*

*As a result of a strong commitment to the housing and employment needs of the existing and growing population, all residents and businesses will benefit from the improved infrastructure, which will include roads, public transport and services, and community facilities.*

- 2.3 To deliver the vision and to inform policies, the JCS sets out nine 'Strategic Objectives' based around three key themes. These are:

#### **Ambition 1 – A thriving economy**

- *Strategic Objective 1 – Building a strong and competitive urban economy*
- *Strategic Objective 2 – Ensuring the vitality of town centres*
- *Strategic Objective 3 – Supporting a prosperous rural economy*

#### **Ambition 2 – A sustainable natural, built and historic environment**

- *Strategic Objective 4 – Conserving and enhancing the environment*

- *Strategic Objective 5 – Delivering excellent design in new developments*
- *Strategic Objective 6 – Meeting the challenges of climate change*

**Ambition 3 – A healthy, safe and inclusive community**

- *Strategic Objective 7 - Promoting sustainable transport*
- *Strategic Objective 8 – Delivering a wide choice of quality homes*
- *Strategic Objective 9 – Promoting healthy communities*

2.4 The spatial strategy of the JCS is set out through a combination of policies SP1 'The need for new development, SP2 'Distribution of new development' and SD2 'Employment – except retail development'. Together these policies set out the quantum of new development required in the JCS area between 2011 and 2031 and the locations where this development should be provided. The strategy for this is to concentrate new development in and around the existing urban areas of Gloucester and Cheltenham to meet the needs of these communities, to balance employment and housing needs, and to provide new development close to where it is needed, where it can benefit from the existing and enhanced sustainable transport network (such as public transport). A significant proportion of this new development will be provided as 'strategic allocations', most of which are outside of Gloucester's administrative area but are all providing for Gloucester's housing requirements. Please refer to the 'key diagram' later in this section for more information.

**A locally specific vision for Gloucester**

- 2.5 It is important that the City Plan takes forward and delivers the JCS vision, ambitions and strategic objectives. Equally however, it is essential that City Plan expands on this and provides a planning framework that fully addresses the local issues for the City.
- 2.6 The Council's adopted 'City Vision' 'A City ambitious for its future and proud of its past' 2012 – 2022 sets out key overarching priorities for the City that will be delivered by all public, private and voluntary sector partners.
- 2.7 The overarching Vision for Gloucester, chosen by our residents, is:
- 'Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy.'***
- 2.8 The key aims of the City Vision are:
- 1. A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors;***
  - 2. A vibrant evening economy;***
  - 3. A City which improves through regeneration and development;***
  - 4. A City where people feel safe and happy in their community; and***
  - 5. A healthy City with opportunities available to all.***
- 2.9 Taking this further, in order to provide appropriate locally specific policy that positively makes a difference for our communities, it is essential to have a thorough understanding of the characteristics, opportunities and issues for the City.

***Gloucester today, Gloucester tomorrow- A Portrait of the City***

2.10 Gloucester is a small City located in the south west of England. The City is bound by the River Severn to the west with the Forest of Dean beyond. To the east lies the Cotswold escarpment with the Cotswold Areas of Outstanding Natural Beauty (AONB) beyond. It is strategically located with excellent links by road, rail and waterways, and is in close proximity to Gloucestershire, Bristol, Birmingham and Cardiff airports.

- 2.11 The City's population in 2014 was estimated to be 125,600 and is growing year on year<sup>1</sup>. Gloucester will experience the greatest population growth of all of the district areas in Gloucestershire over the coming years, with an expected growth of 20.1% between 2010 and 2035<sup>2</sup>. It is a diverse City, with a wide range of different ethnicities, cultures and backgrounds; approximately 100 different languages and dialects are spoken.
- 2.12 The population of Gloucester is relatively young with the highest number of young people aged under 19 in the south west region (25% of the population) and also a higher than average number of people aged under 30. This is set to increase with the number of children and young people in the City predicted to grow by over 16.4% between 2010 and 2035<sup>3</sup>.
- 2.13 There are around 53,500 homes in Gloucester<sup>4</sup> and recent evidence shows that the City has achieved significant growth in new homes, being ranked second out of 63 cities. In fact in 2014 Gloucester was one of only five cities in the country that provided at least the amount of new homes required to provide for its population<sup>5</sup>.
- 2.14 The City needs over 14,300 new homes between 2011 and 2031 and is working positively with Cheltenham Borough Council and Tewkesbury Borough Council to identify sites to provide for this<sup>6</sup>. About half of these new homes will be provided in locations on the edge of the City, outside of the Council's administrative area, but it is important that sufficient sites are identified within the City itself to provide the amount and type of new homes that the community needs. . Given the limited amount of developable land within the City, it will be necessary to consider all possible development sites on both greenfield and brownfield land.
- 2.15 The majority of homes in the City are owner-occupied<sup>7</sup>. Highest levels of home ownership are found in the wards of Abbey, Elmbridge, Grange, Hucclecote and Longlevens (more than 80%). The lowest levels of home ownership are in Kingsholm and Wotton, Podsmead and Westgate. Privately rented homes are most common in Westgate, Kingsholm and Wotton and Barton and Tredworth. The City does however experience higher rates of homelessness, though this is often associated with people from outside of the City. By 2035 the City is expected to have 6,000 people over the age of 85. The City Plan needs to ensure that it plans for the housing needs of this older population as well as meeting the needs of those with specific housing needs including Gypsies, Travellers, and Travelling Showpeople, those with learning difficulties, the young homeless, and those with specific physical and mental health needs.
- 2.16 Gloucester has a strong and growing economy, being the main economic driver in the County along with Cheltenham, and there are aspirations for major economic growth over the coming years<sup>8</sup>. Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses<sup>9</sup>. The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses<sup>10</sup>. The City has high employment rates and has been identified as one of the top ten cities where small businesses are investing in 'high growth strategies'<sup>11</sup>. It is important the City protects important business locations and identifies further sites to provide for anticipated employment growth and sectors.

<sup>1</sup> NOMIS Official Labour Market Statistics

<sup>2</sup> Gloucester Regeneration and Economic Development Strategy 2016 - 2021

<sup>3</sup> Ibid

<sup>4</sup> ONS, Neighbourhood Statistics, Gloucester Local Authority Key Figures for Housing

<sup>5</sup> Centre for Cities 2014, Cities Outlook

<sup>6</sup> Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, Main Modifications, October 2016

<sup>7</sup> ONS, 2011 Census

<sup>8</sup> Gloucestershire Strategic Economic Plan (SEP) March 2014

<sup>9</sup> Ibid

<sup>10</sup> Gloucester Regeneration and Economic Development Strategy, 2016 - 2021

<sup>11</sup> Centre for Cities 2014, Cities Outlook

- 2.17 Tourism also forms a very important component of the City's economy, generating approximately 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately £207m. There are major plans to grow this in future years, capitalising on the City's unique and in many cases world class heritage and culture. The City does however lack a major cultural venue that could regularly hold major events such as concerns and theatre productions<sup>12</sup>.
- 2.18 Gloucester City Centre is performing fairly well with a fairly good range of shops, services and facilities. There has been investment, including at the Eastgate Shopping Centre and in creating a more useable public square at King's Square. Plans are also afoot for the regeneration of key sites (see below) and Project Pilgrim at the Cathedral will create a new public realm and other improvements to improve the visitor experience.
- 2.19 However, evidence also shows that there continues to be a poor perception from shoppers around the quality of the environment and the range of shopping available. It further shows that there is a lack of choice from some products, particularly fashion / clothing, and that there are a limited number of independent retailers<sup>13</sup>. The City Centre has lost trade to other competition centres over recent years, as well as increased competition from out-of-centre retailing and the internet<sup>14</sup>. In the future, it is important that further investment is secured in the City Centre and that it capitalises on the success of other key visitor attractions in the City, such as Gloucester Rugby, Gloucester Quays and the Cathedral. Equally, that new retail and leisure development is planned to as to complement and not compete with or undermine the City Centre.
- 2.20 Gloucester is a regenerating City. This began in the 1980's following the demise of traditional manufacturing, which formed a key component of the City's economy. At this time, the City Council moved into the Docks, acting as a catalyst in generating investor interest and confidence in the area. More recently, the Gloucester Heritage Urban Regeneration Company (GHURC) was successful in delivering the regeneration of Gloucester Quays, Greyfriars and the Railway Triangle.
- 2.21 Regeneration is now being driven forward by the City Council with a new Regeneration and Economic Development Strategy (REDS) being recently adopted and actively delivered. The strategy sets out a number of priority regeneration schemes and smaller development sites, along with objectives that seek to deliver significant improvements to the City Centre, jobs, growth, community benefits and an enhanced cultural offer. The Council's priority regeneration sites are King's Quarter and Blackfriars, and significant strides forward have already been made in delivering these. But there is still much to do and it is important that the City Plan provides a flexible and positive framework to support their delivery.
- 2.22 In addition to this, the Council has been successful in securing 'Housing Zone' status from the Government. The Housing Zone covers all of the City Centre as well as other locations in the City. Through this initiative, the Council receives funding and support to help difficult sites to be delivered which is important in unlocking the development potential of sites and in providing much needed new homes in the City.
- 2.23 There are pockets of significant deprivation in the City and in some cases are much higher than the national average. It is estimated that around 20% of children in the City live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, all of which are at higher levels than the national average. Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the City's residents. The City Plan provides the opportunity to ensure that the built and natural environment is enhanced in ways that are cohesive and amenable to healthier lives.

<sup>12</sup> Gloucester's Cultural Vision and Strategy, 2016 - 2026

<sup>13</sup> Joint Core Strategy Retail Study: Phase 1, 2011

<sup>14</sup> Joint Core Strategy Retail Study 2015, February 2016

- 2.24 Evidence shows that half of people in Gloucester aged between 16 and 64 are educated to at least NVQ3 level and above. However, 8.1% of the population have no qualifications<sup>15</sup>. The City has several high performing schools and is home to the University of Gloucestershire, satellite campuses for the University of the West of England and Gloucestershire College. Key issues for the City Plan are to set the framework for the Council to work positively with the local education authority, the County Council, in ensuring adequate school places for the growing population, and creating a positive environment to allow the college and universities to grow and attract students. Another component is to create a dynamic and attractive local economy to retain students once they have completed their courses.
- 2.25 Gloucester is actively engaged in sport and is home to a large number of different sports clubs, in more traditional sports such as football, rugby union and cricket and there is also growing participation in rugby league, American football and Gaelic football. Gloucester has a large number of playing pitches and sporting facilities - but there are shortages in some areas of the City, for example in Barton and Tredworth. Evidence shows that many of the public playing pitches in the City are of poor quality and would benefit from improvements, some of which are already being implemented<sup>16</sup>. The University of Gloucestershire has significant expansion plans for the City and this includes a major investment in new and upgraded sporting facilities at the Oxstalls campus, linked to the adjacent Oxstalls Sports Park. The City Council is also working to bring forward Blackbridge in Podsmead as a Sports Hub.
- 2.26 Car ownership and car use continues to dominate, and there are significant congestion issues in parts of the City, particularly at peak hours<sup>17</sup>. However, a high number of people live and work within an acceptable commutable area, which means there are opportunities for increased use of sustainable transport modes. King's Quarter will include a new modern bus station with improved links to the adjacent railway station, which will go some of the way in encouraging people to use alternative forms of transport to the private car. In addition, the large urban extensions allocated for the City in the JCS have been located in part to encourage the use of public transport and will be required to implement sustainable transport measures. There is also a lack of cycle lanes between Gloucester and Cheltenham. It is important that the City Plan, together with the JCS, creates a positive framework that supports the delivery of the Gloucestershire Local Transport Plan<sup>18</sup> and a move away from the use of the private car.
- 2.27 There are 48 formal play areas in the City and over £1m of investment was made by the City Council in upgrading these between 2009 and 2015. However there remain shortages in open space in some parts of the City, both in terms of quantity and quality<sup>19</sup>. There are numerous informal leisure and recreational assets including for example Robinswood Hill Country Park and Alney Island, both of which have received recent investment and subsequent increases in visitor numbers. As the population of the City grows further investment will be required to improve open space facilities and reduce recreational damage from increased usage.
- 2.28 Climate change is the greatest long-term challenge facing human development. The Gloucester Climate Change Strategy (2010) identifies that even in the 'best-case scenario' Gloucester is likely to experience winters up to 42% wetter, more frequent flooding, worsening summer air pollution, drier summers and loss of wildlife habitats and species. Planning can make a positive major contribution to tackling climate change by shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as weather events and flood risk. The JCS and the City Plan will contain development management policies that will require new development to be designed in ways that promote the use of sustainable

<sup>15</sup> NOMIS official labour market statistics

<sup>16</sup> Gloucester Playing Pitch Strategy, 2015 - 2025

<sup>17</sup> Draft Local Transport Plan, 2015 – 2031, Gloucestershire County Council

<sup>18</sup> Ibid

<sup>19</sup> Gloucester Open Space Strategy, 2014 - 2019



transport, exploit all viable options for providing renewable energy, provide an increase in tree planting and the creation of public open spaces, make use of Sustainable Urban Drainage Systems to manage water and promote biodiversity.

- 2.29 Gloucester is characterised by the River Severn, which runs along the western edge of the City. In addition there are various tributaries that run through the City and into it. As a result parts of the City are subject to flood risk, particularly to the north, west and south west. It is important therefore that the necessary policy framework is in place to ensure this is adequately assessed and addressed through new development, both for today and factoring in the predicted effects of climate change.
- 2.30 Gloucester City has a unique and rich heritage formed by historic buildings, street patterns, archaeological remains, landscape and other physical remnants of its past. A City of intense urban activity for nearly two thousand years, it has a special legacy of nationally significant heritage from all historic periods. The heritage of the City is a central component in the identity of the City. It defines much of what is locally distinctive about the City and that impacts on how residents and visitors feel, use and perceive the city. This has wide reaching implications on the image of the City, the economy, tourism, legibility and the health and wellbeing of the City's residents. The City Plan will provide a policy framework that will seek to protect and enhance the City's unique and significant heritage assets and their settings.

**Turning the City portrait into a vision**

- 2.31 Taking into account the JCS vision and objectives, the City Vision and a thorough understanding of the City, the following locally-specific Gloucester vision has been prepared, to set the broad context for the rest of the plan.

**The City Plan Vision**

*Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.*

*During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.*

*Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.*

*A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.*

*Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.*

*New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.*

*Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy.*

- 2.32 To deliver this Vision, it is proposed that the City Plan is influenced by the following locally-specific key principles.

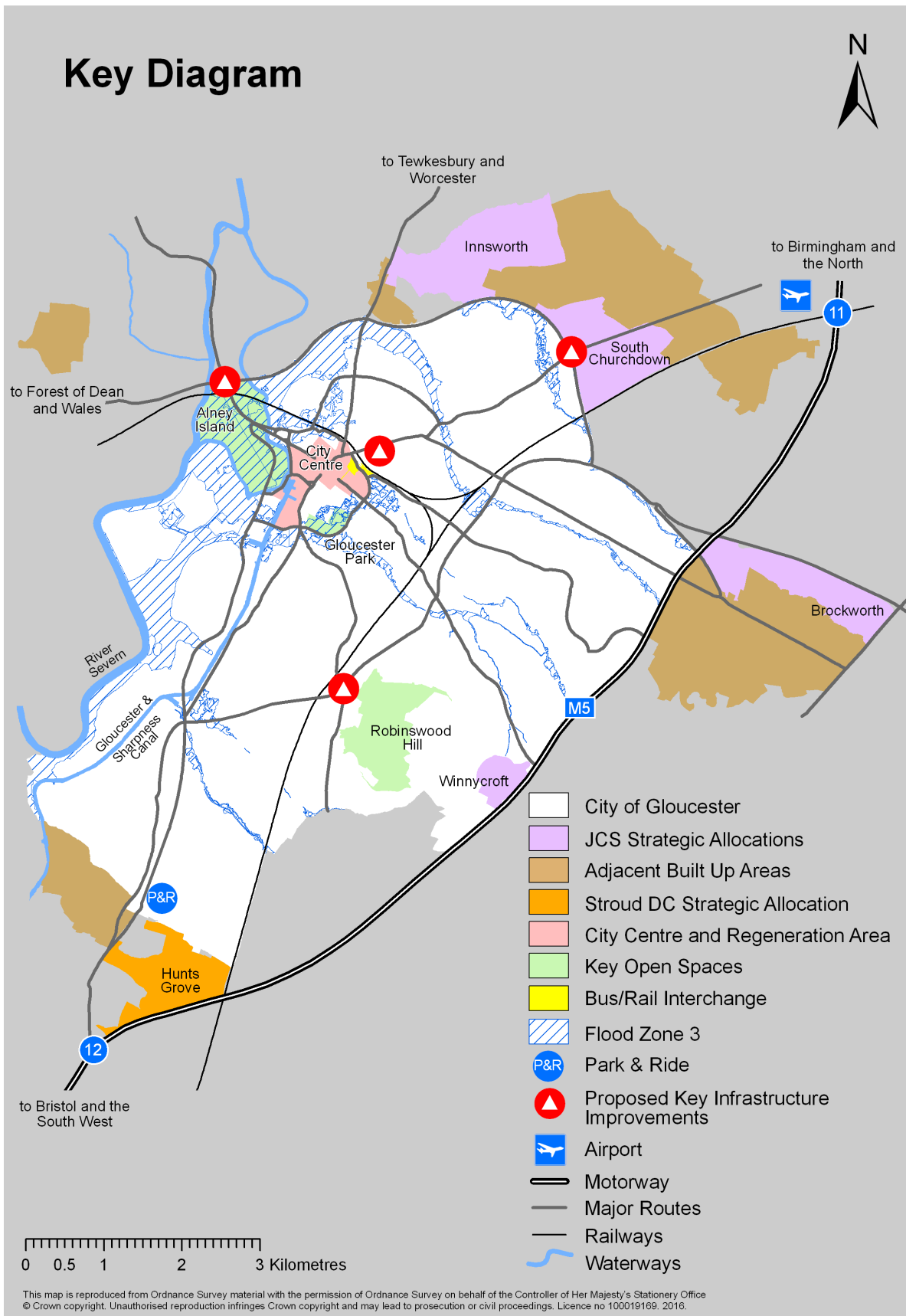
**City Plan key principles**

1. *To ensure development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings;*
2. *To ensure that new development is supported by the necessary infrastructure;*
3. *To regenerate the City Centre and other areas of the City in accordance with the Council's adopted strategies and maximise benefits associated with Housing Zone status;*
4. *To develop a City Centre that provides for the needs of the 21<sup>st</sup> Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations.*
5. *To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community.*
6. *To provide a balanced mix of new homes that provide for the needs and aspirations of the local community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community.*
7. *To encourage and facilitate inward and home grown investment, attracting innovative growth sectors, create high and stable levels of economic growth and increases job opportunities.*
8. *To improve educational attainment, skills and learning opportunities.*
9. *To protect and enhance the City's leisure, recreation and environmental assets, including valuable heritage, public open space, allotments, areas of nature conservation, sensitive landscapes, playing fields and sporting facilities.*
10. *To encourage a vibrant and safe evening and night-time economy in the City Centre that appeals to all age groups and encourages more people to stay overnight.*
11. *To tackle poverty and deprivation in the worst affected areas of the City.*
12. *To deliver development that achieves high quality design that reduces crime and the fear of crime, builds positively on locally distinctiveness and contributes to the creation of an active, connected and sustainable City.*
13. *To ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure.*
14. *To improve health and wellbeing through good design that promotes opportunities for all residents to lead 'activity lives', by providing access to good quality open spaces, playing fields and community facilities, and protecting air quality and residents from pollution and contamination.*

### 2.33 Key diagram

The following key diagram indicates the broad locations of strategic developments and identifies: the main strategic infrastructure elements, Key Open Spaces and the extent of Flood Zone 3.

At this time the JCS Strategic Allocations are being actively negotiated by all three councils. The key diagram will be updated to reflect the outcome of these negotiations prior to public consultation. The key diagram may therefore be subject to change and is a reflection of the Inspector's latest Main Modifications, which have yet to be agreed by all councils.



### **3.0 Development Management Policies**

3.1 This section contains the Gloucester City Plan Development Management policies. These policies will be used by Officers and Members in the determination of planning applications. New development will be required to accord with these policies in order to ensure that the plan delivers developments that meet the vision, aims and objectives.

3.2 The policies are set out in the following topic sections:

- A: Housing
- B: Economic Development
- C: Retail and the City Centre
- D: Health and Wellbeing
- E: Historic Environment
- F: Natural Environment
- G: Design
- H: Sustainable Transport
- I: Infrastructure

3.3 Each topic section begins with a summary of the key issues, an outline of the key evidence used in the policy development and a signpost to the relevant NPPF paragraphs and JCS policies.

## A: Housing

### Policies in this section:

- Policy A1: Use of upper floors for residential
  - Policy A2: Regeneration of neighbourhoods
  - Policy A3: Sub-division of plots for infill
  - Policy A4: Intensification of use of existing dwellings
  - Policy A5: Housing mix
  - Policy A6: Student housing
  - Policy A7: Housing choice for older people and supported and special needs housing
  - Policy A8: Self build
  - Policy A9: Static caravan sites
  - Policy A10: Extensions to existing dwellings
  - Policy A11: Annexes to existing dwellings
- 

### Key Issues

The country is facing a housing shortage; not enough dwellings are being built to meet the need and people's ability to access the housing market is also a matter of concern. The JCS sets the number of dwellings that will be required to meet Gloucester's needs until 2031. The current figure is 14,350. This figure includes dwellings that have been built since 2011, those that currently have planning permission, those that will be allocated through the City Plan, and a windfall allowance. Some of the key housing issues for Gloucester are:

- The delivery of over 14,350 dwellings by 2031, in line with JCS requirement
- Bringing forward brown field central area schemes.
- The delivery of bespoke student housing.
- The delivery of downsized accommodation for older people.
- Gloucester City Homes (GCH) regeneration areas.
- Areas of the city with high social housing need.
- Delivering well designed higher density housing schemes.
- Supporting the changes of use of upper floors in the City Centre to residential use.
- Linking housing delivery to reducing health inequalities in the city.
- The improvement of the private rented sector within the city.

A background topic paper on housing can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

### Key evidence:

- All housing evidence informing the JCS
- Gloucester City SHLAA (2012)
- Gloucester City SALA (2014/15 & 2016)
- Gloucestershire SHMA (2014)
- Housing Needs Assessment for Gloucester (2010)
- Annual Housing Monitoring Reports
- Gloucestershire Population Monitor

### Other key relevant strategies

**Relevant National Planning Policy Framework paragraphs**

21, 47 and 159

**Relevant policies from the JCS:**

SP1: The Need for New Development  
 SP2: Distribution of New Development  
 SD4: Sustainable Design and Construction  
 SD5: Design Requirements  
 SD11: Residential Development  
 SD12: Housing Mix and Standards  
 SD13: Affordable Housing  
 SD14: Gypsies, Travellers and Travelling Showpeople

**JCS strategic objectives met:**

Strategic Objective 8: Delivering a wide choice of quality homes

**Key City Plan principles met:**

1, 2, 3, 6,

INSERT IMAGES HERE

**Housing Policies*****Policy A1: Use of upper floors for residential***

***Within the City Centre proposals to facilitate the change of use of upper floors to residential will be supported and encouraged where they comply with the policies of the JCS and other policies of this plan.***

Within the City Centre evidence points to a large number of vacant floors above the commercial uses that operate at ground floor level. These vacant floors represent an opportunity for conversion to residential uses leading to benefits in terms of providing for housing needs, adding to the critical mass of people living in the City Centre and providing natural surveillance, particularly in the evenings.

***Policy A2: Regeneration of neighbourhoods***

***The Council shall consider applications for the regeneration of estates/neighbourhoods favourably where all of the following criteria are met:***

- 1. The proposal has been properly master planned.***
- 2. The local community has been actively engaged in shaping proposals.***
- 3. The scheme optimises the supply of new housing to meet the needs of the City and the neighbourhood.***
- 4. The scheme protects and improves existing housing.***
- 5. The scheme provides suitable tenure choices to meet the needs of the existing community affected by regeneration.***



- 6. The scheme promotes strong and thriving communities, with a mixed tenure and tenure blind approach, in so far as this does not undermine wider housing and regeneration objectives.**
- 7. The scheme helps to maintain and promote independent living, and improves health and well-being.**

In April 2015 the housing stock owned by Gloucester City Council was transferred to Gloucester City Homes (GCH). Inevitably, over time this housing stock will require considerable maintenance and further investment. Rather than bearing the increasing cost of maintenance, it may prove more economically viable for these areas of housing to be redeveloped in order to provide new accommodation to meet the needs of existing and future residents and to make the best use of land? However, older established housing areas can offer decent conditions, satisfied tenants, community stability, well-maintained buildings, high density, additional infill buildings and community facilities. Therefore it is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods involved. The work to assess any additional capacity that might arise as a result of estate regeneration in Gloucester is currently ongoing and a further update will be provided in the next iteration of the City Plan.

**Policy A3: Sub-division of plots for infill**

**The subdivision of plots for the construction of additional dwellings will be permitted provided that:**

- 1. The proposed development would not have an unacceptable affect on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of neighbouring dwellings.**
- 2. Adequate off street parking and access arrangements can be provided for both existing and proposed dwellings.**
- 3. The proposed development does not prejudice the potential for the comprehensive development of adjacent land where appropriate.**

There are circumstances where the sub-division of an existing plot to provide for additional homes can be reasonably accommodated. However, it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area. For this reason it is important to ensure that careful consideration is given to the design and location of the proposal as well as the parking and access arrangements. This policy seeks to ensure that factors such as these are given due consideration in the assessment of planning applications.

**Policy A4: Intensification of use of existing dwellings**

**The intensification of the use of existing dwellings will be permitted provided that the proposal meets all of the following criteria:**

- 1. The proposed development would not have an unacceptable affect on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of neighbouring dwellings.**
- 2. Adequate parking, access and covered and secure cycle storage arrangements can be provided for the proposed intensified use.**
- 3. There is adequate amenity space for the proposed number of residents.**
- 4. Adequate, well designed bin storage areas are integrated into the curtilage of the dwelling.**

There are circumstances where the existing use of a building as a dwelling can reasonably be intensified. For example the conversion of a larger dwelling into two or more flats. However, it is important to ensure that the proposal does not have a significant adverse impact on neighbouring properties or the wider area. For this reason it is important to ensure that careful consideration is given to the design and location of the proposal, to amenity space, as well as to parking and access arrangements. This policy seeks to ensure that these factors are given due consideration in the assessment of planning applications.

**Policy A5: Housing mix**

***The Council shall ensure that a suitable mix of housing tenure is provided in all new housing developments. This shall include affordable housing, in order to meet the needs of those who cannot access suitable market housing.***

***An appropriate housing tenure mix shall be informed by the Strategic Housing Market Assessment (SHMA) which is current at the time of the determination of applications and shall include a percentage of 'adaptable and adapted' homes to meet the needs of an ageing population.***

The City Council has commissioned a number of Housing Needs Assessments and completed a number of Strategic Housing Market Assessments (SHMA). These studies have consistently identified the need for a range of market housing and affordable housing in the City and in particular the need for rented affordable homes. The 2010 SHMA (Fordham Research) recommended that 75% of affordable homes built should be for rent with the remaining 25% intermediate rent or affordable home ownership. The 2015 SHMA (HDH Planning) indicates a shift towards a higher level of affordable home ownership.

***Policy A6: Student housing***

***The Council will work with local higher education establishments and student housing providers to facilitate the delivery of bespoke student accommodation at appropriate central locations within Gloucester but specifically within the City Centre. The Council expects proposals for student accommodation to demonstrate that they support educational establishments within, or in close proximity to the City. Housing provision for students should be located in accessible locations close to public transport corridors and local services and facilities.***

***The Council will support proposals that:***

- 1. Provide a high quality living environment which includes a range of unit sizes and layouts.***
- 2. Ensure that facilities will be well managed and that there will be no detriment to local amenity or unreasonable harm caused to nearby residents or the surrounding area.***
- 3. Demonstrate that the facility is suitable for year round occupation and that it has long term sustainability and adaptability.***

The presence of two local higher education establishments, Hartpury College, an outlier of the University of the West of England, and the University of Gloucestershire, within or in close proximity to the City has resulted in increased demand in the City for student accommodation. While there is some bespoke student housing within the City demand is also currently being met through the private rented sector. The University's housing services make use of the Council's 'Fit to Rent' scheme when recommending property in the private rented sector to its students.

The University of Gloucestershire has purpose built student accommodation within the City Centre and at its Oxstalls campus just outside the City Centre. A new Business School at Oxstalls, due to open in September 2018, will result in increased demand for student accommodation in the City.

When students occupy accredited 'Fit to Rent' scheme properties in the City, they utilize rented accommodation that might otherwise have been available to families or others in housing need. It is necessary therefore to deliver purpose built student accommodation in the City to ensure that family housing in the private rented sector remains available to families in need.

The Council is actively working with higher education establishments and student housing providers to deliver purpose built student accommodation at regeneration sites within the City Centre. New student housing should be well located to the public transport network between Gloucester and Cheltenham as well as in close proximity to existing shops and services and the City's regenerated transport interchange.

The Council will seek to negotiate with higher education establishments to ascertain whether any purpose built student housing in the City Centre could be used to provide accommodation for tourists/visitors during the long summer holiday period.

**Policy A7: Housing choice for older people and supported and special needs housing**  
**Housing proposals for older people should focus on the provision of high specification care ready accommodation which should:**

- 1. Help to meet an identified need.**
- 2. Demonstrate that it would not have a harmful impact on the character and amenities of the surrounding area.**
- 3. Be accessible to local shops and easily accessible by public transport.**

**A proportion of a scheme providing elderly care, defined by either C3 or C2 Use Class, or for supported or special needs housing will normally be required to contribute to affordable housing need.**

**Schemes should demonstrate adequate external amenity space to provide a high quality and safe external living environment for residents, including areas for sitting, socializing, gardening and active leisure pursuits.**

**Proposals for specialist elderly care, including dementia care accommodation, should provide adequate communal facilities including accommodation for essential staff on site and should reflect current best practice in the design of such specialist accommodation.**

In Gloucester in 2014 about 2.3% of the population were over the age of 85, this is expected to rise to 4%, by 2035 (Source: Gillian Skinner - Gloucester City Council citing ONS data). Planning for this demographic change therefore needs to happen now in terms of the availability and type of accommodation that older people may want to move into.

Older people are more likely to be owner occupiers without a mortgage and to under occupy their property, however as the population of the City ages some elderly people will remain in housing need. National research demonstrates that most older people would prefer accommodation that is part of the ordinary housing stock but is designed to meet their needs. Therefore adapting existing housing stock to extend housing choice for older people will be encouraged particularly where it can release family sized accommodation. This will help deliver the mixed communities as identified in the Joint Core Strategy.

The preferred form of housing development for older people in the City is high quality care ready accommodation. It is anticipated that an additional 387 units of such accommodation will be required by 2021.

It is unlikely that an additional extra care facility will be required in the City before 2021 as the predicted number of units required in that period of 52 is relatively small for a full stand alone extra care facility and would probably best be met by one larger cross boundary development.

In addition, it is important that housing continues to be provided within the City for those with specific housing needs including those with learning difficulties, the young homeless and those with specific physical and mental health needs. This is acknowledged through the adopted Gloucester City Council Plan (2014-2017) and its Objectives for Gloucester to be *'An active, healthy & safe city for all to enjoy'*, *'A City for Everyone'* and a city where there is *'Affordable and decent housing for all.'* Additionally, the Gloucester Housing Strategy (2015) emphasizes that housing plays a critical role in promoting the well being of its citizens. Housing for some client groups will have specific requirements such as the need to be located in

close proximity to district or local centres for the provision of shop and services and access to public transport.

**Policy A8: Self-build**

***The Council will continue to maintain a self-build register and positively support applications for self build that meet the relevant policy requirements.***

Self build housing is where the home is custom built to the individual's specification as opposed to being designed and built by a construction company to a standard specification for sale. Self build housing can be built or commissioned by individuals (or groups of individuals) for their own occupation. The NPPF Paragraphs 50 & 159 requires Local Planning Authorities (through their Strategic Housing Market Assessment and Strategic Housing Land Availability Assessments) to identify and make provision for housing need, including for 'people wishing to build their own homes.'

The City Council considers that the self build option can have a number of advantages such as; lower costs, increased choice, potential for more innovation & green technology, higher build quality, use of local suppliers / local economy and an improvement to the diversity of the local housing supply. The Council wishes to increase opportunities for low and middle income groups, communities and downsizers to build their own homes.

**Policy A9: Static caravan sites**

***Existing static caravan sites shown on the Proposals map will be safeguarded for their current use and proposals for alternative development on these sites will not be supported.***

Living in a static caravan is a choice and a way of life for some people and static caravans provide a type of affordable accommodation. There are four large static caravan parks in the City and their loss would place a considerable burden on alternative affordable provision. Sites could not easily be replaced within the City. Existing sites will therefore be protected from alternative development proposals.

**Policy A10: Extensions to existing dwellings**

***Permission will be granted for the extension of residential properties, and for the erection of outbuildings incidental to the enjoyment of the dwelling, provided all of the following criteria are met:***

- 1. The plot size of the existing property is large enough to accommodate the extension or outbuilding without resulting in a cramped or overdeveloped site.***
- 2. The height, size and design of the extension or outbuilding is in keeping with the scale and character of the original dwelling (accounting for any cumulative additions), and its wider setting.***
- 3. The residential amenity of existing or adjoining occupiers is not prejudiced by the proposal as a result of increased overlooking, overbearing development, increased noise, increased movement or intrusive lighting.***

A well designed house extension can be a good way of providing additional accommodation and an improved living environment. An extension can improve the overall quality and efficiency of a home, as well as improving its flexibility to enable for example: working from home, better access, space for growing or extended families and allow residents to remain in their home and community even if their circumstances change.

The Council seeks a high standard of design to house extensions to ensure that the extension is appropriate in terms of the character of the existing property, the surrounding street scene, and causes no unreasonable harm to those living in or around the property and to their enjoyment of their homes.

Further guidance can be found in the Supplementary Planning Document: "Home Extension Guide".

**Policy A11: Annexes to existing dwellings**

**Applications for the development of an annexe will only be permitted where it can be clearly demonstrated that the annexe will satisfy all of the following criteria:**

**The annexe should:**

- 1. Be an extension to (or at least closely related to) the principal dwelling and be designed in such a manner as to enable the annex to be used at a later date as an integral part of the principal dwelling.**
- 2. Have a functional link with the principal dwelling (i.e. the occupants should be a dependant relative(s), and the accommodation provided should not be wholly “self-contained”, such that the annexe is ancillary and there remains a reliance on the connection with the main dwelling).**
- 3. Be of a subservient design and scale and shall not provide more than 1 bedroom and restrained living accommodation (unless there is clear unambiguous justification provided).**
- 4. Be in the same ownership as the principal dwelling.**
- 5. Have no boundary demarcation or sub division of garden areas between a curtilage annexe and principal dwelling.**
- 6. Be of an appropriate design and scale which would preserve the character of the area and the living conditions of the occupiers of neighbouring properties.**

**The applicant should:**

- 7. Demonstrate that the annexe can only be accommodated within a separate building this shall be sited in close proximity to the principal dwelling house, be of a restrained scale, within the same curtilage and share the vehicular access, parking and amenity areas and not provide a self-contained living unit.**
- 8. Make a unilateral undertaking covenanting that the annexe will be used solely as accommodation ancillary to the main dwelling house and that it cannot be let or disposed of separately from the planning unit.**

Where planning permission is required for an annex the Council is unlikely to grant planning permission where the development results in the creation of a separate dwelling, which in normal policy circumstances would not be acceptable.

A key point when considering the link between the proposed annexe and the existing dwelling is who uses it, as well as what is provided within it. The test will be whether you would be happy with a “stranger” occupying the accommodation and sharing the garden and parking area etc. It is recognised that no two applications will be the same; applicants should therefore bring to the Council’s attention any other material considerations that may be relevant to the application.

The Council will expect any applications for planning permission to clearly set out for whom the accommodation is to be provided for and to fully justify the need. The application should be accompanied by a unilateral undertaking ensuring that the annexe is used solely as accommodation ancillary to the main dwelling house and cannot be disposed of separately from the main house. Such proposals will be expected to meet the development obligations associated with a new dwelling.

Annexes at dwelling houses which are in multiple occupation will not be supported.

**Gypsies, Travellers and Travelling Showpeople**

Gloucester has an established traveller community, particularly Travelling Showpeople. National planning policy<sup>20</sup> requires local planning authorities to locally assess the need for new accommodation for the traveller community and to put into place a strategy to provide for those needs within the period that is being planned for.

The most recent evidence on housing need for the traveller community is contained within the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSA). This study shows a need in Gloucester for two Gypsy/Traveller pitches and eight Travelling Showpeople plots between 2016 and 2031. This includes both those that travel for the purposes of work (i.e. meet the planning definition of a Gypsies, Travellers and Travelling Showpeople), as well as those that do not. For more information please refer to the GTTSA on the City Council's website at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

The JCS does not deal specifically with site allocations for the traveller community. This is because the need is not strategic. Site allocations therefore need to be included in Local Plans. However, JCS Policy SD14: 'Gypsies, Travellers and Travelling Showpeople' does set out a detailed criteria-based policy which is to be used in the determination of speculative planning applications and in the assessment of potential site allocations.

In partnership with other Gloucestershire local planning authorities, the City Council has undertaken a 'call for sites' (on two occasions), where members of the community, developers and landowners have been invited to submit sites they consider could be suitable for residential Gypsy, Traveller or Travelling Showpeople use. These processes yielded several sites that were assessed. However only one site has been identified as having potential for Travelling Showpeople. This site is known as the 'Former Town Ham Allotments' and is identified as a proposed site allocation in the Draft City Plan (Site reference SA21). It is considered appropriate to allocate this site for this community because it is located directly adjacent to the existing and long-established Travelling Showpeople community off Westend Parade to the north west of the City. However, the site is significantly constrained in terms of land stability, land contamination and the presence of a high pressure gas main. At the time of writing the City Council is undertaking the necessary background research to establish if the site is deliverable, taking account of the costs involved in remediating the site to the required standard. If the site is found to be deliverable as an extension to the existing Travelling Showpeople site then it will be allocated for this use.

At the time of writing there are no other known deliverable site opportunities to provide for the identified Travelling Showpeople or Gypsy / Traveller need. As part of the Draft City Plan consultation however the City Council is undertaking another 'call for sites'. With this in mind, if any members of the community, landowners or developers would like to submit a site for assessment this would be strongly encouraged.

If not enough deliverable sites are identified in the City for the Gypsy / Traveller and Travelling Showpeople community, a formal request will be put to neighbouring authorities under the 'Duty to Cooperate' for their assistance in meeting this need.

---

<sup>20</sup> Planning Policy for Traveller Sites, August 2015

## B: Economic Development

### Policies in this section:

Policy B1: Employment and Skills Plans  
 Policy B2: Existing Key Employment Sites  
 Policy B3: New Employment Sites  
 Policy B4: Existing Employment Space  
 Policy B5: New Employment Space

---

### Key issues:

With the emerging modifications to the JCS and the need for further employment evidence base for Gloucester city, the employment context and evidence base are still being finalised. However with our current knowledge the following are considered to be the key employment issues for the city:

- The regeneration of brownfield sites.
- Attracting new office investment into the city centre.
- Pressure for retail development on protected B Class employment sites with potential retail impact issues.
- Potential loss of 'unviable' employment sites that can be evidenced as suitable for Starter Homes development
- Retention of vacant employment sites outside the city centre that are situated on arterial routes.
- Retention of the large greenfield employment commitment at Kingsway Framework 5 for employment purposes
- Delivery of the JCS strategic allocations around Gloucester, including new employment land at Innsworth and South Churchdown.

A background topic paper on economic development issues can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

### Key evidence:

- JCS Strategic Assessment of Land Availability Gloucester (2013)
- Gloucester City Strategic Assessment of Land Availability (2014/2015 & 2016)
- JCS NLP Employment Land Review (March 2011/August 2011)
- Exam 138 NLP JCS Employment Land Assessment Update (Oct 2015)
- Exam 139 JCS Economic Update Paper (Nov 2015)
- Strategic Economic Plan for Growing Gloucestershire First (2014)
- General Permitted Development Order (2015)

### Other key relevant strategies:

- Gloucester Regeneration and Employment Strategy (2016 – 2021)
- 

### Relevant National Planning Policy Framework paragraphs:

18, 20, 21, 22, 24 and 161

---

### Relevant policies from the JCS:

SD.2 Employment

---

**JCS strategic objectives met:**

Strategic Objective 1: Building a strong and competitive economy

Strategic Objective 2: Ensuring vitality of town centres

Strategic Objective 3: Supporting a prosperous rural economy

**Key City Plan principles met:**

1, 2, 4, 7, 8,

INSERT IMAGES HERE

**Economic Development Management Policies*****Policy B1: Employment and Skills Plans***

***For major housing development (20 or more units) and major commercial development (1,000 sq. m of new commercial indoor floorspace) applicants will be required to submit an Employment and Skills Plan (ESP). The plan will identify opportunities for the employment and skill development of local people through the implementation of the development proposal.***

***The ESP should address priorities identified and agreed at an early stage through liaison with the Council and local employment and skills agencies. The ESP will have targets and these will be in conformity with industry standard benchmarks of the employment / skills outcomes expected from the particular size and type of construction proposed.***

There is a need for a focused improvement in educational attainment and skills in Gloucester. In order for local people to get jobs it is obvious that they need the right education and skills in order to be aligned with the needs of employers. But employers also need to play their part in giving opportunities to suitably qualified people from the local area.

In the long term it is not socially or environmentally sustainable for people to travel long distances to work so employers should be encouraged to recruit locally.

The Gloucester Regeneration and Economic Development Strategy 2016-2021 under Objective 4 seeks to:

- Promote recruit local policies and employment and training plans, connecting people and communities to economic opportunity.
- Work with partners to ensure new work opportunities target those in disadvantaged communities who have the support to ensure they are well placed to benefit from such opportunities.
- Work with employers and skills providers to ensure there is a direct correlation between skills supply and demand.

***Policy B2: Existing Key Employment Sites***

***As existing large-scale employment commitments, the following sites are safeguarded for B Class employment purposes in order to ensure a supply of employment land within the City over the plan period:***

- ***Land at Kingsway Framework 5***
- ***Land at Spinnaker Park***
- ***Land at Corinium Avenue***
- ***Land to the North of Walls***
- ***Land at Waterwells Business Park***
- ***Land at Northern Railway Triangle***
- ***Land at Bristol Road***



***Other existing employment sites will be safeguarded unless alternative proposals for development intensify levels of employment on that site.***

***Policy B3: New Employment Sites***

***With the aim of locating jobs near to economically active populations, new employment development will be supported:***

- ***at Strategic Allocations as outlined in Policy SA1 of the Adopted JCS; within new or existing buildings within Gloucester;***
- ***at suitable locations where it would encourage mixed use development, the expansion of existing businesses and small and medium sized enterprises;***
- ***at sites allocated for employment in Table X.***

***Policy B4: Existing Employment Space***

***A change of use from offices (Class B1) in the City Centre and at sites listed in Table X will not normally be permitted, unless alternative proposals for development intensify levels of employment on that site. The proposal must be considered acceptable against the plan policies as a whole. Proposal which result in the loss of a B Class use outside the City Centre and on sites not listed in Table X, will only be supported where there is clear evidence that the site is no longer viable and suitable for B Class use. The Council will encourage and support other employment generating uses subject to acceptability against the plan policies as a whole.***

***Policy B5: New Employment Space***

***Development proposals which enhance employment provision and help promote B Class employment will be supported where:***

- ***the proposal is appropriate in terms of its setting, impact, connectivity, scale, design and size;***
- ***the proposal makes better use of previously developed land or buildings;***
- ***the proposal is an appropriate extension to strengthen or diversify an existing business operation;***
- ***the proposal provides for opportunities for new office development in appropriate locations of the city which are well located to the road network and public transport network.***

Gloucester currently acts as an economic growth centre for the County, and this role is set to continue. The City's current employment provision is principally focussed within the Bristol Road corridor, (including Green Farm and Olympus Park), the City Centre, Barnwood Business Park, the Eastern Avenue gateway and Waterwells Business Park. These areas should be retained as a focus for local employment and principally for B class employment uses.

In meeting Gloucester's growing population it is imperative that new jobs are secured for the City and where possible existing employment areas are protected and strengthened for this purpose. Therefore there is a presumption against the redevelopment of existing employment land for other land uses where the location remains both viable and suitable for employment purposes.

Opportunities for new employment land also exist to the south of the City at the Kingsway urban extension in Quedgeley, which is in close proximity to the existing Waterwells Business Park, as well as a potential extension to the Waterwells Business Park. There are also opportunities for the more efficient use of existing employment land off Bristol Road and Eastern Avenue. Investment in these existing employment areas will be encouraged.

Measures to build enterprise, creativity, innovation and new skills will also be encouraged.

## C: Retail and the City Centre

### Policies in this section:

Policy C1: Maintaining the vitality and viability of city, district and local centres

Policy C2: Proposals located within the City Centre boundary, Primary Shopping Area, primary frontages and secondary frontages

Policy C3: Visitor attractions

Policy C4: Overnight accommodation

Policy C5: Major cultural venue

Policy C6: Evening and night-time uses

### Key issues:

- City Centre is performing well, and has many positive attributes but also has some weaknesses including lack of comparison goods choice; in some places a poor quality environment and a poor perception / image.
- Increasing competition from other city / town centres and out-of-centre shopping.
- Lack of significant investment in new retail floorspace in the City Centre since the 1970's.
- Significant amount of out-of-centre shopping, largely restricted to the sale of bulky goods but increased pressure for relaxation to allow wider range of goods which could adversely affect the City Centre and other centres if not carefully considered.
- Poor linkages and a lack of connectivity between some parts of the City Centre.
- Poor quality public transport arrival point, but this is changing with the development of Phase 1 of the King's Quarter scheme, with a new bus station, linked with the train station to form a high quality public transport interchange. It will be important to ensure active frontage in the Primary Shopping Area from the new bus station in later phases.
- Some large derelict areas that can leave users feeling isolated and unsafe, particularly during the evening and at night.
- Lack of people living in the City Centre, though recent additions include the former technical college scheme. Opportunities for increased City Centre living, for example through the redevelopment of vacant upper floors.
- Lack of a locally defined impact threshold affecting the ability of the authority to require impact assessments beyond the NPPF threshold of 2,500 sq m gross.
- Strong and improving evening / night-time economy at Gloucester Quays, but poor range of offers in and around the PSA meaning there is a lack of vibrancy and it can feel isolated and unsafe in parts. Potential for polarisation of the evening and night-time economy.
- Deliverability of City Centre sites.
- Allowing flexibility through planning policy whilst maintaining and enhancing the integrity, vitality and viability of the Primary Shopping Area.
- Lack of a full range of overnight accommodation choices. For example, the City does not benefit from a youth hostel and there isn't a higher end hotel located in the City Centre. In contrast, the City is well provided for in terms of budget hotel accommodation.
- Good range of district and local centres serving the needs of local residents. However, there is evidence that Quedgeley District Centre is overtrading, with pressure for change of use at adjacent sites, for example Space Business Park.
- Fairly static vacancy rates at around 10% with the Primary Shopping Area, down though from a high of 15% in 2012. There has been a drop in the number of smaller A1 units as a result of change of use to betting shops, tattoo parlours etc.
- Whilst the City is well provided for from mid-range chain restaurants, there is a lack of independent and higher end restaurant choices.
- There is some fear of crime in the City Centre.

- Excellent small venue in the Guildhall for meetings, the arts and music. However there is a lack of major conferencing facilities or a larger cultural arts venue, in contrast to other locations such as the Centaur in Cheltenham.
- Lower numbers of overnight visitors compared to other comparable cities.

A background topic paper on retail and the City Centre can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

### Key evidence:

- **JCS Retail Study (Phase 1) 2011**
- **JCS Retail Study 2016**
- **City Centre Healthcheck 2016**
- **District and Local Centre Survey 2016**

### Other relevant strategies:

- **Gloucester Regeneration Strategy 2016 - 2021**
- **Growing Gloucester's Visitor Economy 2014**
- **Gloucester's Cultural Vision and Strategy 2016 - 2026**
- **Public Realm Strategy 2015 (emerging)**
- **Hotel Capacity Study 2009**
- **Gloucester Parking Strategy (emerging)**
- **Gloucester Economic Development Strategy (emerging)**

---

**Relevant National Planning Policy Framework paragraphs:**  
23-27 and 161

---

**Relevant policies from the JCS:**  
SD.3 Retail and City/Town Centres

---

**JCS strategic objectives met:**  
Strategic Objective 1: Building a strong and competitive economy  
Strategic Objective 2: Ensuring vitality of town centres

---

**Key City Plan principles met:**  
1, 2, 3, 4, 5, 10

---

INSERT IMAGES HERE

**Policy C1: Maintaining the vitality and viability of city, district and local centres**

**A: The City Council identifies the following hierarchy of designated town centres to which this policy applies.**

<b>Key urban centre</b>	<b>District centres</b>	<b>Local centres</b>
<b>Gloucester City Centre (including the Primary Shopping Area)</b>	<b>Quedgeley District Centre Abbeymead District Centre</b>	<b>Barton Street Coney Hill Parade Finlay Road, Robinswood Glevum Way, Abbeydale High Street, Tredworth Kingsway Matson Avenue Mead Road Old Cheltenham Road, Longlevens Seventh Avenue, Tuffley Seymour Road Windsor Drive, Tuffley</b>

**The boundaries of the City Centre, Primary Shopping Area and primary and secondary shopping frontages have been adopted through Policy SD3 'Retail and City / Town Centres' of the JCS and are reproduced in the 'Central Area Inset' of the Proposals Map.**

**The boundaries of the district and local centres is shown of the Proposals Map.**

**B: Within these boundaries, proposals for main town centre uses, including retail and leisure development will be supported, provided that they are:**

- i. Appropriate in location and scale, having regard to the hierarchy identified above), and**
- ii. Contribute to a safe, attractive and accessible environment will be supported.**

**C: All proposals greater than 1,000 sq m where they affect the City Centre and 250 sq where they affect district and / or local centres will be required to submit a full Retail Impact Assessment.**

**D: Planning permission for retail and leisure development, located outside of these centres will not be granted unless the applicant has demonstrated that:**

- i. The sequential test as set out in the National Planning Policy Framework (or any future test that replaces this) has been completed to the satisfaction of the Local Planning Authority and there are no other more centrally located premises or sites that could reasonably accommodate the proposal; and**
- ii. The impact test as set out in the National Planning Policy Framework (or any future test that replaces this) has been completed to the satisfactory of the Local Planning Authority and it has been demonstrated that the proposal would not in itself, or in combination with existing planning permissions lead to a significant adverse impact on any designated city, district and local centres upon which the proposal would impact.**

*Proposals located within the Primary Shopping Area and City Centre*

*The boundaries of the Primary Shopping Area (PSA), primary frontages, secondary frontages and City Centre has been identified in the JCS. The PSA is the focus of retail development and within it, there are defined 'primary frontages' and 'secondary frontages'. Primary frontages include a high proportion of retail uses, such as clothes, food, drink and household goods. Secondary frontages are characterised by a wider range of different uses, such as restaurants, leisure uses and businesses. The City Centre is the focus for a wide range of other 'main town centre uses', such as leisure and offices, but not retail.*

The policy recognises that the nature and function of the PSA has, in recent years, changed. It seeks to maintain a focus for A1 retail within the PSA, but allows flexibility for the consideration of appropriate main town centre uses, where it can be demonstrated that they would maintain or enhance vitality and viability. Within secondary frontages, it is accepted that a wider range of main town centre uses are appropriate.

It further accepts a wider range of uses within the City Centre boundary, but not retail, which should be directed to the PSA.

**Policy C2: Proposals located within the City Centre boundary, Primary Shopping Area, primary frontages and secondary frontages**

**Within the City Centre boundary, primary frontages and secondary frontages, the following policies apply:**

1. **Within the City Centre boundary, new leisure, culture, tourism, office development, community facilities and residential will be supported, where it would not have a significant adverse impact on the amenity of adjacent residents or businesses.**
2. **Within the primary shopping frontages identified, new retail development will be encouraged. The change of use of A1 (retail) premises at ground floor level will not be permitted, unless it can be demonstrated that the proposed use will maintain or enhance the vitality of the area and where it would not have a significant adverse impact on the amenity of adjacent residents or businesses.**
3. **Within the secondary shopping frontages identified, the change of use of retail uses to use classes A2 (financial institutions), A3 (restaurants and cafes), A4 (pubs), A5 (hot food takeaway), D1 (non-residential institutions) and D2 (assembly and leisure) will be permitted provided that it would not have a significant adverse impact on the amenity of adjacent residents or businesses, or result in a continuous frontage of two or more non-A1 retail units.**

**Retail needs and sites**

The JCS identifies that up to 2031 Gloucester City should plan for at least 41,542 sq m (net) of floorspace for the sale of comparison goods (non-perishable goods such as clothing, household goods and toys) and 3,664 sq m (net) of floorspace for the sale of food (supermarkets, food stores and convenience stores).

<b>Floorspace (sq m net)</b>	<b>2015</b>	<b>2016</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>
<b>Comparison</b>	<b>0</b>	<b>0</b>	<b>6,819</b>	<b>23,381</b>	<b>41,542</b>
<b>Convenience</b>	<b>1,217</b>	<b>1,346</b>	<b>2,120</b>	<b>2,967</b>	<b>3,664</b>

The process of identifying specific sites to deliver new retail development will be undertaken through a combination of the immediate review of JCS Policy SD3 'Retail and City / Town Centres' following adoption and City Plan, within the context of a comprehensive retail strategy for the JCS and the city. In the meantime, the City Council will continue to support proposals that deliver additional retail floorspace within the adopted Primary Shopping Area and that support regeneration initiatives within it.

**Policy C3: Visitor attractions**

**The City Council will support proposals for new visitor attractions located within the City Centre boundary.**

**For proposals outside of the City Centre boundary, proposals will be supported where it is demonstrated that the proposal:**

1. **Cannot be accommodated in the City Centre; and**
2. **Is located in a location accessible by public transport; and**

**3. Is located on a main public transport route and where there would not be a significant adverse impact on the highways network and environmental quality.**

'Growing Gloucester's Visitor Economy' (2014) shows that tourism continues to play an important role in Gloucester's economy and in recent years growth has consistently outperformed both national and regional growth rates in the wider economy. Gloucester continues to be a nationally important historic City, with world class cathedral, rich and varied history, regenerated docks, premiership rugby team and a strong and expanding program of annual festivals and events.

Between 2002 and 2010 GVA growth rates of tourism related industries in Gloucester averaged at 7.9% per annum. Furthermore, figures released by the Office for National Statistics (ONS) in June 2014 show that in 2013 there was a 38% increase in international visitors to the City. Looking ahead, Visit England have projected that during the next two decades the visitor economy will grow by 5% per annum, which for Gloucester would mean an increase in GVA £110m to £230m. With this in mind, capitalising on tourism opportunities can make an important contribution to the City's economy.

**Policy C4: Overnight accommodation**

**Proposals for new overnight accommodation (hotels, guest houses, bed and breakfasts, youth hostels) will be supported within the City Centre boundary.**

**Outside of the City Centre boundary, proposals for overnight accommodation will be permitted where it can be demonstrated there are specific locational requirements or where the accommodation would be well located to an existing or proposed visitor attraction.**

Despite the increasing role tourism has played within Gloucester's economy, there is at present a lack of a full range of accommodation choices in the City Centre. There is not for example a youth hostel, or a full-service hotel. At the same time, tourism in Gloucester (and the wider area) is expected to grow significantly within the plan period and evidence shows the potential for a significant growth in the number of overnight rooms required. The City Council is therefore keen to encourage a range of new overnight accommodation options, particularly within the City Centre.

**Policy C5: Major cultural venue**

**The City Council will support proposals for a major cultural and arts venue in suitable locations within the City Centre boundary. The City Council, working with partners, will work to identify a suitable location and delivery mechanisms.**

Gloucester has some very good cultural and arts venues, including for example The Guildhall, which has an ongoing and expanding programme of events. There are also a range of other smaller facilities that offer spaces for small performances and exhibitions, and recently Gloucester Rugby has started hosting two large concerts a year. However, the city does not have a major cultural and arts venue, in particular that can host major events, and there is an aspiration to deliver one in a suitable location within the City Centre.

**Policy C6: Evening and night-time uses**

**The City Council will support proposals that enhance the evening and night time economy within the City Centre, provided that they:**

**Would not, either on their own or cumulatively, result in a significant adverse impact on neighbouring uses in terms of disturbance, highways, safety or the balance of uses in a particular locality.**

The City Council wishes to support a vibrant evening and night-time economy that provides for all members of the community. There are instances where some uses have the potential to cause disturbance to neighbouring properties or the locality more generally and this policy seeks to ensure that they are adequately considered and addressed as part of planning applications.

## D: Health and Wellbeing

### Policies in this section:

Policy D1: Active design  
 Policy D2: Outdoor space  
 Policy D3: Accessibility  
 Policy D4: Allotments  
 Policy D5: Open space  
 Policy D6: Provision of playing pitches in new development  
 Policy D7: Protection of open space and playing fields  
 Policy D8: Landscape  
 Policy D9: Community facilities  
 Policy D10: Mobile catering units  
 Policy D11: Air Quality  
 Policy D12: Noise  
 Policy D13: Pollution  
 Policy D14: Contamination  
 Policy D15: Cordon Sanitaire  
 Policy D16: Suicide Prevention

---

### Key issues:

Health and Wellbeing covers a wide range of issues, all of which impact on the quality of life for the City's residents and visitors.

The City faces a number of health challenges and inequalities in which planning and place making has an important role to play. The level of these health challenges is significant and it is of the utmost importance that the Local Plan includes meaningful policies that can help to influence positive future change.

The health and wellbeing of the City's residents should be a consideration in all policy making and in the determination of planning applications.

Access to quality built and natural environment undoubtedly impacts the health and wellbeing of those people who live or work in that place. Planning has an important role to play in delivering places and spaces that provide the best opportunities for people to make positive choices.

A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:

- Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.
- The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

A background topic paper on Health and Wellbeing can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

### Key evidence:

Active Planning Toolkit 2 – Promoting and creating built or natural environments that encourage and support physical activity, Gloucestershire NHS, February 2014  
 Future of Ageing, Government Office for Science Published 4th November 2013, updated 28th September 2015  
 Public Health England Adult Weight Data Factsheet, October 2015  
 World Health Organisation – Non-communicable disease Fact sheet, January 2015  
 Public Health England Gloucester District Health Profile, June 2015  
 Gloucestershire Health and Wellbeing Strategy 2012 – 2032 Fit for the Future, Gloucestershire Health and Wellbeing Board  
 Gloucestershire Suicide Prevention Strategy, Gloucestershire County Council and Partners, July 2015  
 Understanding Gloucestershire - A Joint Strategic Needs Assessment (JSNA), Gloucestershire County Council and Gloucestershire Clinical Commissioning Group, October 2015  
 Planning Healthier Places – report from the reuniting health with planning project, PHE and Town and Country Planning Association, November 2013  
 Planning Healthy Weight Environments, PHE and Town and County Planning Association, December 2014  
 Obesity and the Environment: Increasing Physical Activity and Active Travel, PHE and the Local Government Association, November 2013  
 Obesity and the Environment: Regulating the Growth of Fast Food Outlets, PHE, Chartered Institute of Environmental Health, Local Government Association, March 2014  
 Improving Access to Green Space, PHE, UCL Institute of Health Equity, September 2014  
 Everybody Active, Every Day – An Evidence-Based Approach to Physical Activity, PHE, September 2014  
 Everybody Active, Every Day – What Works – The Evidence, PHE, October 2014  
 Preventing Suicide in England, A cross-government outcomes strategy to save lives, HM Government Best Practice Guide, September 2012  
 Gloucester’s Cultural Vision and Strategy 2016 – 2026, Gloucester City Council, 2016  
 Gloucestershire’s Prevention and Self-Care Plan: Scaling up prevention through empowering individuals and enabling active communities, Gloucestershire County Council, Gloucestershire Clinical Commissioning Group, NHS Trust, 2016

**Relevant National Planning Policy Framework paragraphs:**

56 to 68 and 69 to 78

**Relevant policies from the JCS:**

SD.15 Health and Environmental Quality.

**JCS strategic objectives met:**

- 4 – Conserving and enhancing the environment
- 5 – Delivering excellent design in new developments
- 7 – Promoting sustainable transport
- 9 – Promoting healthy communities

**Key City Plan principles met:**

**1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14**

**Policies**

*Major planning applications will need to be accompanied by a Health Impact Assessment. The applicant will also be required to submit supporting information to demonstrate how the development positively contributes to health and wellbeing and the 10 principles of Active Design checklist developed Sport England and supported by Public Health England. <https://www.sportengland.org/media/3426/spe003-active-design-published-october-2015-email-2.pdf>*

*A Health Impact Assessment promotes sustainable development that supports the creation of strong, vibrant and healthy communities, by:*



- Demonstrating that health impacts have been properly considered when preparing, evaluating and determining development proposals.
- Ensuring developments contribute to the creation of a strong, healthy and just society.
- Helping applicants to demonstrate that they have worked closely with those directly affected by their proposals to evolve designs that take account of the views of the community.
- Identifying and highlighting any beneficial impacts on health and wellbeing of a particular development scheme.
- Identifying and taking action to minimise any negative impacts on health and wellbeing of a particular development scheme.

**Policy D1 Active Design**

**Streets and public areas should be designed to allow ease of movement for pedestrians and cyclists, and designed in such a way that they encourage walking to local amenities and services, and are well connected to surrounding area.**

The location, accessibility, layout and design of developments all affect the extent to which people are able to make healthy choices and lead active lives. Active design promotes healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities, good levels of connectivity; green open space and safe places for active play and food growing, and is accessible by walking, cycling and public transport.

Accessibility and walking distances shall be measured in accordance with the guidance provided in Manual for Gloucestershire Streets 4<sup>th</sup> Edition and any subsequent amendments.

**Policy D2 Outdoor Space**

**Outdoor amenity space and garden space should be retained or provided at a level that reflects the character of the area and the scale of the development.**

Gardens and amenity space have an important role to play in health and the creation of a sense of wellbeing. Gardens and amenity space should be of a size that reflects the character of the area and be fit for purpose for the scale of the development. This is in addition to the provision of public open space.

**Policy D3 Accessibility**

**Development proposals should meet the highest standards of accessible and inclusive design by demonstrating that they meet the following principles:**

- i. can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances**
- ii. are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment**
- iii. are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways**
- iv. are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.**
- v. are dementia friendly.**

Good design should reflect the diversity of people who use it and not impose barriers of any kind. People with both physical and learning disabilities in our community should be able to access the places everyone else takes for granted. Development proposals should ensure that the needs of people with all types of mobility difficulties, both physical and sensory, are taken into account when considering the design of development proposals. This includes extensions to all buildings particularly those used by the general public such as shops and community facilities.

With an increasing ageing population and a steady rise in the number of people with dementia it is important to ensure that new development is dementia friendly. The design of the environment can make a difference to levels of independence and a person's ability to access and negotiate the built environment.

Applicants are advised to refer to the key design features set out in “At a Glance: a Checklist for Developing Dementia Friendly Communities” Housing LIN, 2012  
[http://www.housinglin.org.uk/library/Resources/Housing/Support\\_materials/Viewpoints/Viewpoint25\\_AtAGlance.pdf](http://www.housinglin.org.uk/library/Resources/Housing/Support_materials/Viewpoints/Viewpoint25_AtAGlance.pdf)

The City Council will actively encourage developers to provide enhanced accessible toilets within schemes. Especially in developments that are accessed by the public. Standard accessible toilets do not meet the needs of all people with a disability. This reduces the accessibility of the City and its enjoyment for some of our residents and visitors. The Council endorsed the use of “Changing Places: the practical guide” which can be found at [http://www.changing-places.org/install\\_a\\_toilet.aspx](http://www.changing-places.org/install_a_toilet.aspx)

**Policy D4 Allotments**

**In housing developments of 30 or more dwellings, the Council will require the provision of a fully serviced allotment site to a standard of 0.2 hectares (1/2 acre) per 1,000 population. Off site financial contribution will be acceptable where on-site provision is not feasible.**

**Development involving the loss of part or all of an existing allotment site will only be permitted where:**

- 1. The loss of the site would not result in unmet demand for allotments within a reasonable walking distance (1.2km); and**
- 2. Replacement provision is made of at least equivalent size and quality, in a convenient and accessible location to serve the existing plot holders; or**
- 3. Existing allotment sites within the City and their management will be enhanced by compensatory measures secured by a planning obligation.**

Allotments have a number of benefits. They offer an economic, healthy and sustainable way of growing produce and provide vital habitats for wildlife and plants. Furthermore, they promote healthier lifestyles through regular exercise and promote mental health and wellbeing through stress reduction and purposeful activity.

Allotments are particularly important where residents do not have a suitably sized garden to offer a cultivable plot. Therefore the Council will seek in new residential development of 30 or more dwellings, a minimum of 0.2 hectares per 1,000 population, or equivalent financial contribution towards off-site provision or enhancement, where on site provision is not feasible.

This requirement is in addition to the Public Open Space requirement

**Policy D5 Open Space**

**The Council will expect all residential development and major employment development to provide an appropriate amount of Public Open Space in accordance with the City Council’s current Public Open Space Standards.**

**For larger residential schemes of 30 or more dwellings, public open space will be required on-site. For smaller residential schemes where the provision of public open space on-site is not feasible, a financial payment will be sought to improve and enhance existing public open space or to create new public open space within the locality.**

**Open space should be useable, accessible, well located, appropriately equipped and designed, overlooked by adjoining properties and take account of community safety issues.**

**An appropriate commuted sum will be sought from developers to cover future maintenance costs of public open space in new developments. This will be a matter for negotiation.**

Gloucester City Council defines public open space as the following:

‘Open Space is that which is available for sport, active recreation, or children’s play, which is of a suitable size and nature for its intended purpose, and safely and freely available to the general public’.

The Council’s 2014 ‘Open Space Strategy’ identifies that Gloucester is suffering from a deficiency in public open space. Gloucester’s deficiency in public open space is not evenly distributed, both in terms of quality and quantity. There is for example a notable lack of open space in some areas, such as Inner Barton and

Quedgeley, whilst some other areas have relatively high quantities of public open space, but quality and access to this space are not at an acceptable standard.

The strategy identifies and sets a quantity standard for open space provision across the city of 2.8ha per 1000 population. However, because open space is not distributed evenly, there are six city wards where there is a significant shortfall in terms of the adopted standard:

Barton & Tredworth (0.24ha/1000)

Moreland (1.04ha/1000)

Quedgeley Severn Vale (1.08ha/1000)

Tuffley (1.19ha/1000)

Hucclecote (1.54ha/1000)

Kingsholm & Wotton (1.74ha/1000)

Consideration should also to be given to Policy F5: Green Infrastructure to ensure connectivity between open spaces and the wider Green Infrastructure network.

**Policy D6 Provision of Playing Pitches in New Development**

**All new developments will be expected to provide for the sporting needs arising from the residents of that development, in accordance with the adopted Gloucester Playing Pitch Strategy (2015). Where possible, this should be provided for onsite. Alternatively, a financial contribution will be required for the improvements of facilities elsewhere in the City.**

The Council has an up-to-date Playing Pitch Strategy (PPS), prepared in accordance of Sport England guidance and which satisfies paragraphs 73 and 74 of the NPPF.

The PPS shows that there is a shortage of playing pitches to provide for demand both now and in the future. Therefore all pitches are subject to protection unless one of the five Sport England exception tests can be satisfied.

The PPS also shows that new provision is needed in the city and it is necessary for provision / contributions to be made through development sites.

**Policy D7 Protection of Open Space and Playing Fields**

**There is a general presumption against the loss of existing and proposed open space including playing fields unless it can be demonstrated that:**

- 1. There is no longer a demand or prospect of demand for the recreational use of the site and a deficiency would not be created in the short term or long term through its loss for recreational use; or**
- 2. The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use; or**  
*(Typical types of development that may meet with this exception include pavilions, changing rooms and sports lighting which improve the sporting usage of the site).*
- 3. Suitable alternative provision of equivalent or greater recreational or community benefit is made in an easily accessible location well served by a range of sustainable transport modes; or**
- 4. It can be demonstrated that it is an area or part area of poor quality which is unsuitable for recreation and compensatory enhancements to existing public open space in the locality are implemented; or**
- 5. The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development.**
- 6. The redevelopment of a small part of the site will secure the retention and improvement of the remainder (to be secured through a Section 106 legal agreement); or**
- 7. The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields’.**

Green open spaces in Cities are increasingly being recognised as important land uses in promoting the quality of life of urban living. Open space, both public and privately owned, contributes to the health of residents, adds aesthetic and visual amenity to the vitality of the built environment, provides opportunities for passive and formal recreational pursuits whilst also providing valuable habitats for wildlife in the City. The Council is therefore committed to protecting existing provision, bringing back into public use playing pitches that have been taken out of the supply and encouraging greater community access to playing fields currently either privately owned or operated or in education of ownership.

**Policy D8 Community Facilities**

**Planning permission for the redevelopment or change of use of community facilities will be permitted only when the following can be clearly demonstrated:**

- 1. It is no longer viable to run the property as a community facility, and;**
- 2. The facility has been appropriately and positively marketed for a reasonable period and no reasonable offers have been received, and;**
- 3. An alternative replacement community facility will be provided on part or all of the site, or within reasonable walking distance of the site. The size and nature of this facility will be determined through evidence of extensive engagement with the community and the Council's Partnership and Engagement team to ensure that the replacement facility meets the needs of the community that it will serve and is fit for purpose; or**
- 4. The facility is not in use due to lack of demand and it can be established that there is a surplus of community facilities providing the same offer in the locality, and no other organisation is willing to acquire the site and continue its use as a community facility.**

Community facilities are considered to be a necessary component in supporting strong, vibrant and healthy communities. It is important that the community facilities which reflects the community's needs and supports its health, social and cultural wellbeing are protected or provided as appropriate. As such the Council will seek to protect against the loss of community facilities.

Community facilities can include public houses, community centres, sports venues, meeting places, cultural buildings and places of worship.

Where applications for a change of use or redevelopment of a community facility are received, the Council will require evidence that:

- A. a comprehensive sustained marketing campaign (agreed in advance by the Council) has been undertaken using an agreed realistic valuation of the premises;**
- B. the marketing campaign has run for a period of at least twelve months before the planning application is submitted;**
- C. if marketing has been based wholly or partly on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal;**
- D. the community facility has been offered for sale locally, and in the region, in appropriate publications and through specialised agents;**
- E. it can be demonstrated that the community facility is not financially viable; in order to determine if this is the case, the Council will require submission of accounts for the last three full years in which the facility was operating as a full-time business;**

**Policy D9 Mobile Catering Units**

**Proposals for mobile catering units will be supported where the following criteria are met:**

- 1. The design of the mobile catering unit would not have a significant adverse impact on the visual amenity of the area;**
- 2. The proposal would not have a significantly adverse impact on neighbouring properties and uses within a reasonable distance of the proposed location in terms of noise, traffic disturbance, odour, litter, light or hours of operation;**
- 3. The proposal would not have a severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues;**
- 4. The proposal incorporates adequate waste storage and disposal facilities; and**
- 5. Consideration will be given to any positive health impacts provided by the range of food and drink available to customers, and the proposed location of the facility.**

**6. Note: The council will expect mobile catering units to be removed from the site following each day of trading, when located on public land.**

The council consider that there is a need to maintain a balance in the number of mobile catering units available for the public against permanent hot food establishments. Issues such as visual and residential amenity, transport impacts, possible pollution issues and health issues generally also need to be considered.

The permanent and regular stationing of a mobile catering normally requires planning permission because of the change of use of the land on which the unit is situated.

Although applicants for mobile catering units tend to apply for 7 days a week they do not always use this allowance. This note to the proposed interim policy will help prevent the units being parked in position 24 hours a day, 7 days a week, which sometimes occurs. This would benefit the visual amenities of the area and availability of on street parking at non trading times.

**Policy D10 Air Quality**

**Where there is a localised source of air pollution, buildings should be designed and sited to reduce exposure to air pollutants.**

**Development proposals will ensure that development is not contributing to poor air quality and provide air quality assessments where appropriate.**

Air pollution is the result of emissions, such as carbon monoxide, nitrogen oxides and sulphur dioxide, being released into the atmosphere. The impact of dust, fumes and odour on air quality also need to be considered. The main sources of emissions are transport, combustion and industrial processes. Air pollution has been linked to health problems such as asthma and other respiratory diseases, and damage to the surrounding environment.

There are three Air Quality Management Areas (AQMAs) in the city: Barton Street AQMA, Priory Road AQMA, Painswick Road AQMA. Opportunities shall be taken to improve the AQMAs wherever possible.

**Policy D11 Noise**

**Proposals to locate development that is likely to generate unacceptable noise levels close to noise sensitive uses will not normally be permitted.**

**Proposals to locate noise sensitive development in areas with existing high levels of noise will not normally be permitted. Mitigation of noise impacts through design, layout, and insulation will be expected where appropriate.**

Noise can impact on mental health, undermine quality of life and affect natural habitats. This includes persistent and intermittent noises, from service plant on buildings, road traffic, sound systems, construction and domestic noise. The separation of noise sensitive development such as residential, health and educational uses from noise generating sources can reduce the effects of noise on those uses. Noise generating sources within the city include transport routes, commerce, sport, recreation and other leisure time activities. Proposals for noise sensitive development where it is affected by noise generating sources will not be permitted unless satisfactory mitigation measures can be demonstrated.

**Policy D12 Pollution**

**Development that may be liable to cause pollution of water, air or soil, or pollution through noise, dust, vibration, light, heat or radiation will only be permitted if the quality and enjoyment of the environment would not be unduly damaged or put at risk.**

**Particular attention will be given to development of potentially polluting uses in close proximity to sensitive uses such as schools, hospitals, housing or offices. Development of sensitive uses such as schools, hospitals, houses and offices will not be permitted where they would be adversely affected by existing polluting uses.**

Pollution includes all manner of emissions that can cause harm to people and the environment generally. The role of the planning system is to ensure that potentially polluting new development is acceptable in its location. It is for other relevant bodies including our Environmental Health Section to actually control

emissions. Nevertheless, new development should be designed to ensure that it does not lead to unacceptable emissions of pollutants, which may cause health or environmental problems and then has to be controlled by our Environmental Health Section or other agencies. This is particularly relevant where a potentially polluting use is proposed next to a sensitive site (schools, hospitals etc.) It is also incumbent upon the authority to ensure that these potentially sensitive uses are not located near to existing sources of pollution.

#### **Policy D13 Contamination**

**Proposals on land which may be contaminated should be accompanied by an investigation to establish the level of contamination in the soil and/or groundwater/surface waters and identify appropriate mitigation. Development which could adversely affect the quality of groundwater will not be permitted.**

A full assessment of potential hazards and the measures necessary to counter these will be required before applications are determined. Developers should consult the Environment Agency and the City Council's Environmental Health Section prior to submitting a planning application to establish the need for studies to be undertaken into potential effects on water resources and other receptors. Any subsequent planning application will be referred to the Environment Agency for their comments.

#### **Policy D14 Cordon Sanitaire**

**Development likely to be adversely affected by smell from Netheridge Sewage Works, within the constraint areas defined on the proposals map, will not be permitted.**

Severn Trent Water Limited is responsible for sewerage and sewage disposal. They operate Netheridge sewage disposal works south of Hempsted. The fields adjoining Netheridge are used for sludge disposal that, in addition to the works itself, create unavoidable smell problems. In order to reasonably prevent development that would be adversely affected by smell, a cordon sanitaire area is shown on the proposals map within which development will not generally be permitted.

The cordon does not represent the absolute limit of the area where smells can be detected, but are drawn so as not unreasonably to constrain development in the existing built-up area.

#### **Policy D15 Suicide prevention**

**On buildings of 4 or more storeys management and/or mitigation measures should be taken to help prevent suicide. Mitigation measures are well designed and incorporated into the design of the building.**

Suicide is a national and local health priority. In Gloucestershire suicide kills approximately 60-67 people a year.<sup>21</sup> When compared to deaths from road traffic accidents, which were 29 in 2014<sup>22</sup>, suicide is responsible for twice as many deaths. Whilst not all suicide can be prevented through mitigation measures in the urban environment, it is the Council's responsibility to do all that in can to keep people safe. In planning, a simple thing that can be done is to make sure that where there is public access to tall buildings, that these buildings are designed in a way that restricts the access or the possibility of jumping or falling from the upper floors. This accords with the government's objective to reduce access to the means of suicide. Retrofitting schemes can be expensive, cumbersome and poorly designed, as such it is considered appropriate to deal with this issue from the outset to ensure well-designed buildings.

<sup>21</sup> Gloucestershire Suicide Prevention Strategy, July 2015, Gloucestershire County Council and Partners

<sup>22</sup> Road Safety Gloucestershire, 2014, Gloucestershire County Council

## E: Historic Environment

### Policies in this section:

Policy E1: Historic environment development management

Policy E2: Recording and advancing understanding of heritage assets

Policy E3: Buildings of local importance

Policy E4: Shopfronts, shutters and signs

---

### Key issues:

Whilst Gloucester does have a rich and unique heritage, it also has a number of local challenges that need addressing through the City Plan:

- There is a current perception by applicants and developers that only the area marked on the current local plan map (2001) as 'Principal Archaeological Area' is of archaeological significance, when in fact there is potential for significant archaeology across the whole city. The City Plan will need to see a move away from the 'Principal Archaeological Area', in favour of a more generic overarching policy across the city as significant archaeology could be present on any development within the City given its rich historical context.
- Findings from previous City Plan consultations indicate that residents think that the council should do more to make the most of the city's heritage assets. Depending upon ownership and resources it is not always possible or even appropriate to preserve every heritage asset as a tourist attraction or museum piece. However there are practical things that can be done to engage local community groups and make more of the city's heritage assets:
  - Seek opportunities for more community based archaeology and built heritage survey work to be undertaken.
  - Use development opportunities to bring into use, maintain, enhance and secure the future of heritage assets. – all assets including non listed and also public realm and streetscape.
  - Maintain interpretation boards, continue to update plaques and provide information available to residents and visitors.
  - Ensure that where development involves the recording of heritage assets that these recordings are publicly displayed and exhibited.
- The Conservation Area management policies that form part of the Conservation Area Appraisals are not fully utilised in the development management process and opportunities to improve the Conservation Areas are often missed. This is mainly due to the fact that the Conservation Area Appraisal and Management documents were produced after the Gloucester City Council Second Stage Deposit 2002 Local Plan and there are limited policies which can be used as they are only supplementary planning guidance. Specific policy inclusion in the City Plan heritage policy will be necessary.
- Gloucester has a number of Buildings at Risk and Vulnerable Buildings. There have been a number of prominent heritage assets that have been left vacant and abandoned for many years. The NPPF paragraph 130 clearly states that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision. Due to the issue of Buildings at Risk it is felt appropriate that although this point is iterated in the NPPF, it is also included in any local policy as part of the City Plan.
- Ensuring that development is locally distinctive and builds positively upon Gloucester's unique character and heritage.

- As part of the regeneration process it is important that improvement of the public realm and historic streetscapes are included, this is often missed due to the lack of a policy for this in the 2002 Plan, although it is identified in the conservation area appraisals

A background topic paper on the Historic Environment can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

### Key evidence:

Planning (Listed Buildings and Conservation Areas) Act 1990

Ancient Monuments and Archaeological Areas Act 1979

European Landscape Convention adopted at Florence on 20/10/2000 (European Treaty Series No. 176)

Convention for the Protection of the Architectural Heritage of Europe adopted at Granada on 3/10/1985 (European Treaty Series No. 121)

European Convention on the Protection of the Archaeological Heritage, revised (The Valletta Treaty) 1992 (European Treaty Series No. 143)

---

### Other relevant strategies:

#### Historic England Advice

GPA1 – Local Plan Making

GPA2 – Managing Significance in Decision-Taking in the Historic Environment

GPA3 – Setting and Views

Advice Note 1 – Conservation Areas

Advice Note 2 – Making Changes to Heritage Assets

Advice Note 3 – The Historic Environment and Site Allocations in Local Plans

---

### Relevant National Planning Policy Framework paragraphs:

126-141, 169

---

### Relevant policies from the JCS:

SD9 – Historic Environment

---

### JCS strategic objectives met:

**Strategic Objective 4** – Conserving and enhancing the environment.

Ensure that planning policy and decisions: Protect and enhance the JCS area's unique historic environment, archaeological heritage and geological assets

**Strategic Objective 5** – Delivering excellent design in new developments

Ensure that all new developments are valued by residents by:

- Integrating them well with existing communities and provide well-located infrastructure which meets the needs of residents



- Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.

**Key City Plan principles met:**

1, 8, 9, 12, 13

INSERT IMAGES HERE

Gloucester has a unique and rich heritage formed by historic buildings, street patterns, archaeological remains, landscape and other physical remnants of its past. A city of intense urban activity for nearly two thousand years, it has a special legacy of nationally significant heritage from all historic periods. The heritage of the city is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. This has wide reaching implications on the image of the city, the economy, tourism, legibility and the health and wellbeing of the city's residents.

This policy should be read in conjunction with the latest version of Policy SD9 Historic Environment of the Joint Core Strategy.

**Conserving and enhancing the historic environment**

The historic environment, consisting of archaeological remains, historic buildings, townscapes and landscapes, including locally significant assets and their settings in addition to designated and statutorily protected features, will be valued, protected, preserved, enhanced and managed for its contribution to character, local distinctiveness and sustainability. New development should seek to safeguard, and where possible enhance, heritage assets and their settings. Development will be required to respect and respond positively to designated heritage assets and their settings, avoiding loss or harm to their significance. Proposals that involve securing a viable future use or improvement to an asset on the Heritage at Risk register will be supported.

**Positive strategy for the conservation and enjoyment of the historic environment**

To ensure the conservation and enjoyment of the City's Historic Environment the Council will:

- Continue to contribute to the maintenance and enhancement of the Gloucestershire Historic Environment Record;
- Review and regularly update:
  - SPDs
  - Conservation Area Appraisals and Management Plans;
  - Article 4 directions; and
  - The local list.
- Produce and maintain a heritage at risk register, and proactively seek to reduce the number of heritage assets on the register by:
  - Exploring opportunities to bring assets into viable use; and
  - Appropriate enforcement.
- Produce and regularly review condition assessments for all heritage assets directly owned or managed by the City Council.
- Seek opportunities for community engagement, education and outreach activities as part of the planning process.

**Describing the significance of heritage assets**

Where planning applications are submitted for sites with archaeological interest:

- Applicants should seek early discussion with the City Archaeologist prior to the submission of an application in order to establish the likely level and scope of supporting information required.
- In the first instance applications on sites of archaeological interest will be required to provide an archaeological desk-based assessment. This assessment should:
  - Be informed by a search of the Gloucestershire Historic Environment Record;
  - Be produced in accordance with a brief from the City Archaeologist; and
  - (where possible) assess the impact of the proposed development on archaeological remains.
- Following receipt of the desk-based assessment the City Archaeologist may judge that archaeological evaluation is required in order to understand the potential impact of the development proposals on the significance of any archaeological remains. Any evaluation will:
  - Be outlined in a brief produced by the City Archaeologist;
  - Be undertaken in accordance with a Written Scheme of Investigation (approved by the City Archaeologist); and
  - The results will be outlined in a report to be submitted in support of the planning application.

Where applications are likely to affect a built heritage asset, or its setting:

- Applications should be supported by a description of the asset's historic, architectural and archaeological significance with an appropriate level of detail relating to the likely impact of the proposal on that interest. A site analysis identifying the qualities which contribute to local character, including development patterns, history, its landscape and views, and how these can contribute to the quality and sustainability of the proposed development should also be provided. This may include:
  - A built heritage assessment;
  - An assessment of significance;
  - A setting assessment; and
  - An impact assessment.
- Applicants should seek early discussions with a Conservation Officer prior to the submission of an application in order to establish the scope and nature of the supporting information required.

***E1: Historic Environment Development Management***

***The City Council will support development that conserves the significance of designated and non-designated heritage assets including archaeological remains and locally listed buildings.***

- ***Great weight will be given to the conservation of the City's heritage assets. New development affecting a designated or non-designated heritage asset or its setting, including alterations and additions, will be expected to make a positive contribution to its character, appearance and significance.***
- ***Proposals affecting designated and undesignated heritage assets and their settings should demonstrate that they meet the following guidance:***
  - ***The use of traditional, local materials and adherence to local building techniques and details, where appropriate;***
  - ***The conservation of features and elements that contribute to the special interest of a heritage asset, including structures forming part of the curtilage, in particular the structural integrity and historic plan-form of listed buildings and historic building groups;***
  - ***Appropriate use of the heritage asset that is compatible with the conservation of its significance;***
  - ***The location, form, scale, massing, density, height, layout, roofscape, landscaping, use and external appearance of developments within conservation areas should conserve and enhance the special historic and architectural interest of the conservation area;***
  - ***Development involving substantial harm to or loss of designated heritage assets will only be granted in exceptional circumstances (wholly exceptional circumstances for designated assets of the highest significance);***

- **Proposals affecting a non-designated heritage asset (including where identified through the planning process) should not harm its special interest and development involving substantial harm will be resisted unless significant public benefit has been clearly and convincingly demonstrated in accordance with the requirements of the NPPF;**
  - **When determining applications, nationally important archaeological remains which are currently non-designated will be considered subject to polices applying to Scheduled Monuments;**
  - **The condition of an historic building resulting from deliberate damage and neglect will not be taken into account in any decision.**
- **The City Council will support applications that make provision for the preservation insitu of archaeological remains.**

Gloucester has a unique and nationally important heritage. The city contains a large number of heritage assets which should be protected or enhanced for the benefit of the city, its residents and visitors, now and into the future.

The historic environment is not just important for its own sake; it adds value to regeneration, improves quality of life, attracts economic investment and contributes greatly to tourism. It is also a source of significant local pride, contributing to local identity and acting as a valuable cultural and educational resource.

In addition to this the historic environment is a finite and non-renewable resource and its protection is therefore an essential element in ensuring a sustainable future. The reuse of historic buildings can contribute to sustainability through retaining rather than wasting embodied energy and avoiding use of energy and materials for new build. Further guidance can be found in *Energy Conservation in Traditional Buildings*, English Heritage, 2008 <http://www.climatechangeandyourhome.org.uk/live/>

### **E2: Recording and advancing understanding of heritage assets**

**Where development will result in the loss (wholly or in part) of a heritage asset, the City Council will require developers to record and advance understanding of the significance of that asset prior to or during development. The appropriate form of mitigation employed will be dependent on the nature of the impact but may include:**

- **Historic building recording;**
- **Archaeological watching brief;**
- **Archaeological evaluation;**
- **Archaeological excavation; and**
- **Preservation insitu by design.**

Mitigation will be undertaken in accordance with a Written Scheme of Investigation approved by the City Council. All new information gathered from investigation and mitigation will be appropriately disseminated and any archive material deposited with the Gloucester City Museum and Art Gallery. Opportunities will be sought for community engagement, education and outreach activities to be integrated into any mitigation works.

The heritage of the city belongs to everyone who lives, works or visits Gloucester. As custodians of this heritage it is important to ensure that an accurate record of Gloucester's Heritage is documented and maintained, and that this information can be freely used by the City Council and its residents.

### **E3: Buildings of Local Importance**

**Where planning permission, Conservation Area Consent or any other form of relevant permission is required, it will not be granted if it would involve the demolition of, or substantial alteration to the external appearance of, any building designated as of local importance on the Local List unless:**

- *all reasonable steps have been taken to retain the building, including examination of alternative uses compatible with its local importance; and*
- *retention of the building, even with alterations, would be demonstrably impracticable;*
- *and the benefits of the redevelopment scheme outweigh the retention of the building*

***E4: Shopfronts, Shutters and Signs***

*There will be a presumption in favour of retaining good quality traditional shopfronts where they make a positive contribution to the character of the area and are capable of repair.*

*Proposals to alter or create a new shopfront, shutter or signs should take account of the guidance provided in the Shopfronts SPD and any subsequent amendments.*

*To ensure that shopfronts, shutters and signs are of a high standard of design and appearance and do not detract from the overall quality of the urban environment.*

## F: Natural Environment

### Policies in this section:

- Policy F1: Landscape
- Policy F2: Biodiversity
- Policy F3: Nature Improvement Areas
- Policy F4: Trees & Hedgerow
- Policy F5: Green Infrastructure
- Policy F6: Geodiversity
- Policy F7: Flooding

---

### Key issues:

As a focus for growth across the County, Gloucester will need to balance development with the requirement to protect worthy landscapes from inappropriate development and maintain and enhance biodiversity.

When looking at the current state of landscape, the City has a tightly drawn urban form surrounded by countryside. The green belt to the North, the AONB to the East and the Severn Floodplain to the West has ensured a sharp urban rural interface. Given the City will need to grow there is an expectation that some of these urban fringe sites will be developed. Also, within the City there are areas of valued landscape that may need to be protected, however, the reality is that they are predominantly in public or benign ownership and do not face the sort of development pressures seen on the periphery.

Concerning Biodiversity/Geodiversity, as is the case with many other urban authorities Gloucester is surprisingly diverse with its mosaic of gardens, allotments, railway lines and parks providing a rich diverse habitat. Biodiversity loss in this environment can be piecemeal and potentially on an individual basis can go unnoticed. While development if done properly can be biodiversity positive, the LPA will need to be aware of overall gains and losses of individual applications. Many of the City's recognised biodiversity assets are in City Council ownership, however, there are sites within private ownership and because of their urban nature suffer from development pressure. With regard to Geodiversity 'Natural' RIGS in Gloucester are owned by the City and should not be threatened from inappropriate development. Those not in a natural outcrop will be part of the built fabric, if they cannot be saved in situ then they can be moved.

The Severn and its Washlands Nature Improvement Area (NIA) is identified to the west of the City, any development will be severely constrained here due to its floodplain nature. Notwithstanding this, any essential development within this area will need to support the wider benefits of the NIA. Development in the City looking to mitigate its ecological impact could do so in this area

With regard to Green Infrastructure (GI) the County has a strong Local Nature Partnership with a commitment to deliver GI benefits across the County. The GI strategy for the JCS identifies a number of issues for Gloucester, of most relevance is the need to connect the urban area with its rural hinterland, in particular the Regional assets of the Cotswold AONB to the east and the River Severn and its Washlands to the west, identified in the JCS as a potential regional park. Development will need to take opportunities to maximise connectivity through innovative use of open space, existing natural features and SUDs. Reducing the impact of pinch points and barriers to biodiversity movement will be a priority. The City owns and manages an excellent network of existing semi natural open spaces on its periphery, connectivity to this will be key.

GWT are working on a GI benchmarking tool, its aim to encourage quality of GI within new development, the City Council will work with GWT developers and other stakeholders to promote this tool as a means of raising quality.

### Climate Change

The Gloucester Climate Change Strategy 2010 identifies that even the lower emission (best case) scenarios will result in the following climate changes for the local region:

- Winters up to 42% wetter.
- More frequent flooding.
- More frequent droughts.
- Worsening summer air pollution.
- More storms and gales and the resulting damage to property.
- Loss of wildlife habitats and species.
- Social unrest through increased migration.
- Higher average temperatures will create a greater need for cooling in offices and homes along with a higher probability of extreme temperatures that could threaten the health of many people.
- Drier summers, that will put a greater strain on water resources and wildlife and put pressure on farmers to diversify crops.
- Rising sea levels that will lead to more coastal erosion and a greater risk of flooding.
- Increased heat stress to the elderly and infirm (the 2003 heat wave in France killed 14,500 people). The weather conditions causing such events will become very frequent.

The high emissions scenario (essentially business as usual) is even more stark, predicting that by 2080 a maximum increase in temperature of 6.9 degrees C. This would leave much of North Africa and Southern Europe uninhabitable.

Gloucester will clearly need to 'do its bit' and help deliver what are challenging international targets. While new development over the plan period will only be a small fraction of the built environment it is important to get it right. Low carbon techniques used on new build will also help reduce the cost of retrofitting the existing building stock as new technologies become mature and more cost effective.

While an urban area such as Gloucester may not be as well endowed with renewable energy potential as some more rural districts, there are always opportunities as has been shown in Gloucester and other urban areas with regard heat pumps, solar and low head hydro. The close proximity of the Canal/River too many development sites in particular has the potential to provide heating and cooling for new build and retrofit. While biomass has potential, being predominantly on the gas grid currently means this may be a niche market. Hempsted land fill and Netheridge sewage works currently produce methane for electricity generation. Exploiting this energy to the full including exploiting waste heat should be maximised.

Resilience to weather extremes, especially the heat island will be a key issue. Gloucester will need to maintain and enhance its tree stock and generally encourage a greener urban fabric with everything from green roofs to public open space. This will also have positive implications for biodiversity.

The County Council in 2010 for published Renewable Energy Study for the County. This was for the purpose of providing an evidence base to help develop Local Plan Policy for renewable energy infrastructure provision on potential strategy development sites in Gloucestershire to help contribute to a reduction in CO2 emissions in line with Climate Change Targets.

Background topic papers on Natural Environment, Flooding, and Climate Change can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

**Key evidence:**

Strategic Flood Risk Assessment Level 1, *Halcrow on behalf of JCS Authorities*, December 2007

Strategic Flood Risk Assessment Level 2, *Halcrow on behalf of JCS Authorities*, October 2011

Strategic Flood Risk Assessment Level 2 – Additional Assessment, *Capita Symonds on behalf of JCS Authorities*, January 2013

Pitt Review (2008)

Sustainable Drainage a Design and Adoption Guide, *Gloucester City Council*, July 2013

Gloucestershire SuDS Design & Maintenance Guide, *Gloucestershire County Council*, November 2015

Briefing Note - Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment, *Environment Agency*, March 2016  
Regional Spatial Strategy South West evidence base  
Revision 2020, *Centre for Sustainable Energy*, 2005  
Merton Council, Merton Rule 2015.  
Renewable Energy Study – Final Report, *Gloucestershire County Council*, June 2010  
Gloucester City Climate Change Strategy, *Gloucester City Council*, 2010

---

**Other relevant strategies:**

United Nations Climate Change Conference 2015

---

**Relevant National Planning Policy Framework paragraphs:**

100, 101-109, 113, 117, 118

---

**Relevant policies from the JCS:**

Policy SD4 Climate Change  
Policy SD7 Landscape  
Policy SD10 Biodiversity/Geodiversity  
Policy INF4 Green Infrastructure  
Policy INF3 Flood Risk Management

---

**JCS strategic objectives met:**

Landscape JCS Objectives 4 and 9  
Biodiversity JCS Objective 4  
Green Infrastructure JCS Objectives 4,6,7 & 9  
Flooding JCS Objective 6  
Climate Change JCS Objective 6

---

**Key City Plan principles met:**

**9, 13, 14**

---

INSERT IMAGES HERE

The natural environment is a precious resource. Not only do natural places provide a refuge from our daily stresses they provide what are increasingly called ecosystem services. Essentially these are functions that green semi-natural spaces provide such as flood management, extreme weather mitigation and other well-being benefits that are rarely costed but are none-the-less essential to modern living. As well as these functional benefits we have of course a moral duty to ensure that species do not further decline. We are currently experiencing a collapse in biodiversity not seen since the mega extinctions of earlier geological epochs. Development has its role to ensure that this is not only halted but reversed.

Gloucester is a diverse City that benefits from a high quality natural environment which it will seek to protect and enhance where possible. Within the City there are:

- Sites of Special Scientific Interest,
- Key Wildlife Sites
- Regionally Important Geological sites
- Sites of high sensitivity in landscape terms
- Green network of formal and informal open spaces linked by green corridors such as disused railway lines and watercourses.
- Ancient trees and hedgerows

A landscape characterisation and sensitivity analysis has been undertaken on the periphery of Gloucester as part of the JCS evidence base. A number of sites vulnerable to large scale development within the city have also been subject to a Landscape Visual Analysis and indeed developable areas identified. Any application will be subject to JCS policy SD7 Landscape. Any sites within the city will also be subject to the following:

**Policy F1: Landscape**

***Smaller areas of land within the urban area not subject to formal landscape characterisation/sensitivity analysis will be judged on their merits. For larger sites (10 dwellings and more xxx m2 commercial floor space) a Landscape Visual Impact Assessment may be required where landscape issues are considered pertinent.***

***Development proposals on land outside the built up areas of the City will need to take account of the landscape character and sensitivity of the area. Applications for development may require a landscape and visual impact assessment to be prepared to inform development proposals. Proposals within sites of higher sensitivity will be subjected to increased scrutiny and constraint and will generally be protected from development to ensure their landscape qualities are retained and safeguarded.***

*The open areas around and within the city are a precious resource that is enjoyed by residents and visitors on a daily basis. The planning system should ensure that this asset where appropriate is protected and if possible enhanced ensuring future generations can share the experience. All development can play a role in protecting and enhancing biodiversity where appropriate the City Council will seek bird and bat box provision and other associated infrastructure as part of development and landscape proposals.*

*When assessing applications for development where biodiversity is potentially affected it will be judged against policy SD10 of the JCS in conjunction with local designated sites as identified on the proposals map.*

*To ensure that small scale development does not erode biodiversity on a piecemeal basis*

**Policy F2: Biodiversity**

***Small scale piecemeal erosion of background biodiversity is to be resisted, applications for small scale development will be judged as a component of a wider system and applications will need to show how biodiversity interests will be taken account of and mitigated against.***

*As a focus for growth in the County, we need to ensure that new development takes place in appropriate locations in order to safeguard the City's valued natural environment. For a number of reasons biodiversity has been in significant decline for a number of years and it is clear that Government expects development to play a role in protecting and where appropriate enhancing biodiversity.*

**Policy F3: Nature Improvement Area**

***Development within/adjacent to the Nature Improvement Area (NIA) as defined on the proposals map will not be subject to any further constraint over and above floodplain requirements, however, any biodiversity mitigation/compensation required will be expected to contribute to the overall NIA target species and habitats. Developers wishing to offset biodiversity loss elsewhere in the plan area can do so by contributing to NIA target species and habitats within the identified local NIA.***

*The Severn and its Washlands NIA lies to the west of the City and is focused on the floodplain of the river Severn. It is an important habitat of strategic value and could be the focus for biodiversity offsetting when proposals within the City cannot deliver biodiversity enhancements on site.*

**Policy F4: Trees & Hedgerows**

**Development will be supported where:**

- 1. It does not have an adverse impact on trees, woodlands or hedgerows of wildlife, landscape, amenity, or cultural value; and**
- 2. It includes the appropriate retention and new planting of trees and woodland; and**
- 3. It does not have an adverse impact on ancient woodland or a veteran\*tree; or**
- 4. In the case of an unavoidable adverse impact on trees and woodlands of wildlife, landscape, amenity, or cultural value, compensatory provision is made.**

*\* Please note: Veteran trees are defined as 'trees that are of interest biologically, culturally or aesthetically because of their age, size or condition'.*

*Trees and hedgerows have cultural significance as well as biodiversity interest. Development proposals should seek to retain where possible these assets for the enjoyment of future generations.*



*Compensatory or mitigation planting depending on location will in general be required to be locally appropriate native species.*

*Tree preservation orders will be served where appropriate to protect trees for their amenity, cultural or biodiversity value.*

*Trees and hedgerows are an important part of the City's landscape. Not only do they give a sense of maturity and attractiveness to development, they are also an important wildlife resource. The City contains a small amount of Semi ancient woodland, this will be protected for its cultural, wildlife and its amenity value.*

#### **Policy F5: Green Infrastructure**

**Development proposals will have regard to Gloucester City Councils Green Infrastructure Plan as articulated in the JCS GI strategy. Proposals that do not contribute to the connectivity of the GI plan will not be permitted unless other aspects of the overall GI plan are supported. Development adjacent to or within the identified GI asset will be expected to connect to and support the GI plan in particular the target points identified.**

*The GI plan seeks to connect the urban areas of Gloucester with the high quality GI assets of the Cotswold's AONB and the Washlands of the River Severn. Proposals will be supported that contribute to this objective.*

*Development generally will contribute to the broader network of GI corridors and assets across the City by the use of SUDS, open space, green roofs and tree planting.*

*GI and its associated corridors and links are a vital component of maintaining and enhancing wellbeing. It also has functions with regard to biodiversity, surface water management, climate change adaption and amenity value. Development has the potential to block corridors resulting in the isolation of habitats which is a particular concern in an urban area such as Gloucester. The rivers, brooks, disused railway corridors, footpaths, open spaces form important corridors linking communities within the City and habitats to the wider countryside. These vital corridors need to be protected and where possible enhanced for their biodiversity value and as pedestrian/cycle routes through the city. GWT are developing a GI benchmarking tool, the City Council will work with developers and other stakeholders as a means of raising the standard of GI across the City*

#### **Policy F6: Geodiversity**

**Any proposal that impacts upon RIGS will be re-sited unless it can shown that the geological interest can remain in situ and be made available to the public potentially this could involve removal to another site. In exceptional circumstances where the permanent loss of a RIG is unavoidable then and relocation is not possible then a full geological assessment will be required and the information deposited on an appropriate records site.**

*The stock of geological exposure is limited and critical (once lost it cannot be recreated) and for scientific and educational reasons needs to be maintained*

#### **Flooding**

The JCS, NPPF & NPPG cover most policy concerns for Gloucester and all development will be expected to be in accordance with these policy statements.

Furthermore on all planning applications involving surface water discharge, development will be expected to be in accordance with the latest version of Gloucestershire County Council's SuDS Design and Maintenance Guide.

Given the unique position of Gloucester at the interface of tidal and fluvial events in the Severn, any development within the Severn Floodplain will be expected to increase flood flow across this area.

The Environment Agency Briefing Note "Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment" March 2016, seeks to protect properties predominantly within Westgate Ward by increasing flood defences along the Eastern Parting of the Severn. Development that

contributes to the delivery of the Environment Agency plans outlined in the Briefing Note, and any subsequent amendments, will generally be supported.

**Policy F7: Flooding**

**All development should not be subject to flood or lead to increased flooding elsewhere. Drainage schemes should broadly be in accordance with the Local Lead Flood Authority Gloucestershire SuDs Design and Maintenance Guide and Gloucester City Council Sustainable Drainage Design and Adoption Guide, and any subsequent amendments.**

**Large Scale Development should deal with its own water and provide betterment of 20% on the calculated greenfield run off rate.**

**Large scale development within flood zone 2 and 3 in Lower Westgate will be expected to contribute to new flood defences along the eastern parting of the River Severn.**

*The effective management of water is important in the development of sustainable communities. It reduces the impact flooding may have on the community, maintains the quality and quantity of our water environment, and can help to enhance local amenity value and biodiversity through the provision of green space.*

*The Strategic Flood Risk Assessments (SFRAs) for the JCS area identify fluvial flood risks from the River Severn and local tributaries, in addition to increased problems from surface water runoff. Site specific flood risk assessments (FRAs) should be submitted alongside development proposals, consistent with national policy and JCS Policy INF4. Developers should use the SFRAs as a starting point for understanding the level of flood risk posed to a particular site. FRAs should be proportionate to the level of flood risk, scale, nature and location of the proposed development, as identified within the SFRAs.*

*The City Council seeks to avoid flood risk. It recognizes also that there is a need to reduce the impact of flooding when it does occur. Proposals should have specific regard to the design principles outlined in the SFRAs, including taking a sequential approach to site layout, ensuring safe access is available for the lifetime of the development and is supported by flood warning and suitable evacuation plans. Surface water runoff can contribute to flood risk and new development will be required to incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage runoff and to ensure that flood risk is not increased elsewhere and to improve the quality of the receiving watercourse and groundwater.*

*All development, including any proposals relating to the existing building stock, should contribute to the management of surface water runoff through the use of SuDS. Consideration should be given to the appropriate application of SuDS, in relation to the scale of development and site characteristics. Proposals should recognize the multi-functional role of SuDS and demonstrate that provision has been made for their long term maintenance and management.*

**Climate Change**

*All applications for development will be assessed against SD4: Sustainable Design and Construction of the JCS.*

*In addition, to ensure the renewable energy potential of the river and canal are exploited and indeed not sterilised by inappropriate development the following policy will apply:*

**Policy F8: Potential of River and Canal**

**Development that exploits the renewable energy potential of the River and Canal will generally be supported. Any development that could potentially disrupt or indeed sterilise this potential will be resisted.**

**Policy F9: Efficiency measures**

**In exceptional cases major applications where no form of renewable/low carbon generation is practical or viable then the extra insulation and efficiency measures may be appropriate.**

**Policy F10: Mitigation through planting and SUDs**

**Development will be expected to help mitigate against the impacts of climate change. In this respect development that provides for trees, green roofs, green open space and Sustainable Urban Drainage Systems will be encouraged and supported.**

*Climate change is an issue that will impact upon us all. Gloucester needs to develop in a manner that minimizes the emission of green house gasses and in a manner that is resilient to the impacts of climate change. There are very tough international targets that need to be met. As climate change becomes more of an issue then it is likely that the pressure to do more will increase. The recent UN conference on climate change will only add impetus.*

*Policy SD4 of the JCS provides a strong policy position on these issues and applicants will need to demonstrate that they have met the requirements of the policy.*

*Buildings currently account for about a third of the UKs greenhouse gas emissions when coupled with transport between them then land use planning clearly has a significant role to play. Roofs on buildings are a vast un-exploited resource that in many cases be utilised for energy generation every effort should be exploited to ensure this resource is not wasted. Also as renewable technologies often require planning permission then the authority needs to be supportive where landscape and other constraints are not overly prohibitive.*

*With regard to resilience, flooding is perhaps the most obvious concern, however other impacts of climate change such as extreme temperatures should also be a factor. Trees and other greenery for example are shown to have a significant cooling effect on urban areas. Trees green walls and green roofs for example should be supported. Research from Manchester University for examples suggests that trees in urban areas can reduce summer heat levels by as much as 4 degrees centigrade.*

**G: Design****Policies in this section:**

Policy G1: Living conditions  
 Policy G2: Car parking  
 Policy G3: Materials and finishes  
 Policy G4: Landscape  
 Policy G5: Bin storage  
 Policy G6: Cycle parking and storage  
 Policy G7: Public realm  
 Policy G8: Public art  
 Policy G9: Community safety  
 Policy G10: Delivering strategies  
 Policy G11: Development alongside main routes  
 Policy G12: Design standards  
 Policy G13: Large scale 20<sup>th</sup> century buildings  
 Policy G14: Transport arrival nodes  
 Policy G15: Gulls  
 Policy G16: Design and climate change  
 Policy G17: Views of the Cathedral

**Key issues:**

- Addressing a legacy of unattractive large scale 20th Century buildings and transport nodes such as multi-storey car parks and the bus and train station.
- Enhancing the routes into the City
- Enhancing the overall standard of design across all developments in a way that respects and enhances what makes Gloucester unique and locally distinctive.
- Addressing specific design issues in residential schemes such as how to best design for car parking, bin storage, cycle storage and house extensions.

A background topic paper on Design can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

**Key evidence:**

All consultation responses to date on City Plan  
 Local Transport Plan (2015 – 2031)  
 Public Realm Strategy (currently in production)  
 Townscape Character Analysis  
 Active by Design – Design Council (2014)  
 Manual for Gloucestershire Streets (2014)

**Other relevant strategies:**

Home Extension Guide – GCC (2008)  
 Heights of Buildings – GCC (2008)  
 Designing Safer Places – GCC (2008)  
 Shop Front Shutters and Signs  
 Lighting Strategy – GCC (2008)  
 Building for Life 12, 3rd edition (2015)

**Relevant National Planning Policy Framework paragraphs:**

56, 57, 58, 59, 60, 61, 63, 64 and 66

**Relevant policies from the JCS:**

SD4 – Sustainable Design and Construction  
 SD5 – Design Requirements (including tables SD5a, SD5b, SD5c, SD5d)  
 SD15 – Health and Environmental Quality

**JCS strategic objectives met:**

Strategic Objective 5 – Delivering excellent design in new developments  
 Strategic Objective 6 – Meeting the challenges of climate change  
 Strategic Objective 7 – Promoting sustainable transport  
 Strategic Objective 9 – Promoting healthy communities

**Key City Plan principles met:**

**1, 4, 10, 12, 13, 14**

Insert images here

*Design should be based on an understanding of the characteristics of the local area, in terms of character, built form, architecture, heritage and landscape. Well-designed attractive places improve the quality of life for all, minimising the opportunity for crime and the perception or fear of crime and enhance the environment; at the same time it contributes to the development of safer, stronger and sustainable communities that can adapt to the challenges of a changing climate*

*Where appropriate the Local Planning Authority may request a Design Brief or Masterplan to accompany a planning application. These documents shall comply with the requirements set out in the Joint Core Strategy Policy SD5.*

*The development should accord with the relevant topic based Supplementary Planning Documents and any subsequent amendments:*

*Home Extension Guide (August 2008)  
 Heights of Buildings (November 2008)  
 Designing Safer Places (August 2008)  
 Shop Front Shutters and Signs (in production)  
 Lighting Strategy (2008)  
 Public Realm Strategy (in production)  
 Townscape Character Analysis (in production)*

**Policy G1: Living Conditions**

***The development should not cause any significant adverse overshadowing, overlooking, or overbearing impacts to the living conditions and amenity of the occupiers of the surrounding properties or to the potential future occupiers and users of the development.***

*It is important that new development does not have an adverse impact on the people who live, or use the spaces around it. Of equal importance, and as a marker of high quality design, new developments must not create new poor quality environments that will adversely affect the amenity of future residents.*

**Policy G2: Car Parking**

***Car parking should be overlooked by active frontages, be sited at the front or as close to the front of the principle elevation of the dwelling or unit as possible, encourage a sense of ownership of the space, uphold the active frontage of the building and reduce opportunities for vehicle crime.***

*There are many examples of failed or failing rear parking courts across the city. Rear parking courts lack a sense of ownership, create opportunities for crime and a fear of crime, reduce activity on the street frontage, are inconvenient to use because of their location away from the front of the property, create areas prone to fly tipping and are often abandoned – pushing more vehicles to park on the highway on streets that were not designed with on street parking in mind.*

Parking provision across all development types must comply with the relevant information contained within Manual for Gloucestershire Streets 4<sup>th</sup> Edition April 2016, and any subsequent amendments.

### **Policy G3: Materials and Finishes**

**The development should be finished in high quality materials that are locally distinctive and respond to the positive character and appearance of Gloucester. The architectural detailing and finishes of the scheme should be of a high quality.**

Attention to detail can really make or hinder the overall appearance and quality of a place. Particular attention will be paid to finishes and materials, joins and fixing methods between materials, window cills and sub cills (double window cills are architecturally inappropriate), window reveals, window design, door design, the placement of meter boxes, flues, vents, chimneys, gutters and down water pipes, aerials and antenna.

Local distinctiveness in the built environment is founded on the understanding of the characteristics and influences of the locality particularly its landscape quality and corresponding use of materials. Understanding this can help to shape our modern communities, giving them a sense of history and distinct local identity whilst supporting sustainable development through use of locally sourced materials and promoting traditional skills. Development will be expected to complement and enhance the varied built environment, creating interesting and attractive buildings and places. It is important that new developments are designed to a high standard to ensure an attractive and functional place for people to live, work and visit to deliver prosperity and help attract inward investment.

### **Policy G4: Landscape**

**Applications for development should be accompanied by a landscape scheme all on a single plan, incorporating hard landscape and planting details. Such plans must:**

- 1. Exhibit a design and choice of hard materials, boundary treatment and planting appropriate to the particular location and existing landscape character, or create a new and distinctive character where this is currently lacking;**
- 2. Retain and incorporate existing natural features such as trees, hedges and watercourses;**
- 3. Ensure, in appropriate developments, especially housing schemes, that adequate space is provided for the planting and maturing of large scale trees;**
- 4. Indicate areas of public open space and amenity land that are proposed for adoption by the City Council.**

**Where appropriate, the use of native species in planting schemes will be required**

Landscape design can do much to enhance a development by providing an appropriate setting for buildings and an environment for people to enjoy. It can define spaces, create shelter and privacy, enhance or screen views, extend wildlife habitats and create identity and character.

The landscape scheme must be considered as an integral part of the project from the outset and throughout the design process. Where appropriate the layout, implementation and management of landscape schemes will be achieved by the use of planning conditions.

The use of native species in new planting schemes, particularly species that are indigenous to the Vale of Gloucester, will help to increase biodiversity in the city. Using local species means:

- they grow better as they are adapted to the local climate
- they will suit their local context (e.g. urban edge sites)
- they support significantly more species of fauna.

Use of seed and plant stock of local provenance will also be encouraged.

### **Policy G5: Bin Storage**

**Bin storage areas are well designed and integrated into the curtilage of the dwelling house, apartment block, or business and are not on the highway. Each storage area is of a size that can**

**easily accommodate all of the bins and kerbside collection boxes required to take advantage of all of the current recycling services offered by the City Council.**

The council operates a number of bin and kerbside recycling facilities. Recycling is an important part of the council's commitment to sustainability. New developments will need to demonstrate how they can comfortably provide space for the various bins required so that residents can easily access all of the recycling and collection services.

Good design is necessary in this area to encourage use of the service, to aid collection, maintain a visually attractive streetscene and to ensure that the highway is kept safe and free from obstruction.

#### **Policy G6: Cycle Parking and Storage**

**All new residential and development will be expected to provide a suitable level of cycle storage and cycle parking. Applicants will need to demonstrate that cycle parking and storage complies with the relevant guidance produced by Gloucestershire County Council.**

In order to encourage cycling it is important that storing and parking cycles is made to be easy, safe and convenient. Cycle parking in public spaces should be situated in open areas with natural surveillance, signage, lighting, be close to key locations and offering security by way of suitable anchor points or lockers. Where necessary shower and changing facilities may be required. Further guidance can be found in the following Gloucestershire County Council documents: Cycle Facility Guidelines (March 2012), Gloucestershire Manual for Streets (4<sup>th</sup> Edition April 2016), Gloucestershire Third Local Transport Plan, and any subsequent amendments.

#### **Policy G7: Public Realm**

**The development is cohesive and well integrated with the surrounding public realm. Viable opportunities to enhance the surrounding public realm are fully investigated, and where appropriate designed in accordance with the guidance provided in the Public Realm Strategy and any subsequent amendments.**

The public realm is an important part of the urban environment. It is crucial that the public realm has a cohesive appearance across the City, rather than a piecemeal approach with a large variety of surfaces materials and street furniture. This is important to the overall quality and appearance of the City, to legibility and to the user experience.

#### **Policy G8: Public Art**

**In new major development schemes across the city the City Council will seek the provision of or a financial contribution towards the commissioning of, publically accessible art, craft and design work, or towards the conservation of part of a public heritage asset.**

In suitable new developments, we will seek the provision of art or artist-designed features. The design and execution of public art should fully involve the local community in which it is located and be properly related to the wider public realm or buildings in the area. In certain circumstances it may be more appropriate that we seek a financial contribution towards conserving a public heritage asset e.g. a statue. We will secure such provision through use of planning obligations.

#### **Policy G9: Community Safety**

**The development, including the associated public realm and landscaped areas, is designed to ensure that community safety is a fundamental principle of the proposed development. This includes:**

- maximizing natural surveillance,
- layout that creates secure perimeter blocks with back to back development,
- creating attractive to use, safe and where appropriate vibrant streets which provide visual interest, active frontages, particularly at street level and avoid blank walls.

*A well-designed environment can help to reduce the real and perceived risk of crime. The design and layout of buildings, open spaces, roads and footpaths can influence opportunities to commit crime and affect people's sense of safety and security. Appropriate design and layout of landscaping, planting and lighting can reduce crime and the fear of crime. Development proposals should be designed to provide safety within the development site and in nearby and adjacent areas. Further guidance can be found in *Designing Safer Places* and any subsequent amendments.*

**Policy G10: Delivering Strategies**

***Development should take every viable opportunity to support the objectives and delivery of the Regeneration Strategy, Lighting Strategy and Public Realm Strategy.***

*The City Council supports all opportunities taken as part of the development process to support the objectives and delivery of the Lighting Strategy and Public Realm Strategy. Improving the quality of the appearance of the City has wide reaching benefits to perception, image, tourism, ease of use, economy and retail.*

**Policy G11: Development Alongside Main Routes**

***New development alongside main routes to the city centre will be expected to be of a high quality to make the routes more attractive to residents and visitors. This will include well-designed buildings and spaces and where appropriate landscaping of the route in the vicinity of the development. Improvements to existing poor quality development alongside these routes will be encouraged.***

*Routes into the City play an important role in the overall image and perceptions of the City.*

**Policy G12: Design Standards**

***Design is of a high quality that takes every opportunity to drive up the standard of development in an area.***

*It is simply not acceptable to reproduce poor or low quality design to be 'in keeping with the local area'. This outlook goes against the intention of national and local design policy and guidance. It is also contrary to the ambitions of the council to ensure that all new development achieves a high standard of integrated design, which reflects the local context and takes advantage of any opportunities to improve the character and quality of an area.*

**Policy G13: Large-scale 20<sup>th</sup> Century Buildings**

***The City Council supports the redevelopment of negative large-scale 20<sup>th</sup> Century buildings and spaces. Redevolutions shall provide buildings, streets and spaces that are of a suitable scale and proportion which is reflective of Gloucester's historic urban grain.***

*Gloucester is a compact city with a distinctive historic core and street structure. Over sized, large scale 20<sup>th</sup> Century developments (buildings and spaces) have eroded this structure and have contributed to the creation of a poor quality visual amenity and a lack of richness and quality to the urban environment.*

**Policy G14: Transport Arrival Nodes**

***The City Council will support the redevelopment of the City's main transport arrival nodal points, including the bus station, train station, and all surface and multistory car parks, where it can be successfully demonstrated that:***

- 1. That there will be no loss in provision of spaces and services, unless the loss can be fully justified and it can be demonstrated that there will be no significant adverse harm to local businesses and that there will be no server impact to highway safety.***



**2. The site will be developed in a way that enhances the connectivity and quality of the routes between the transport nodal point and the City Centre.**

The quality of the arrival points have an impact on the perception and use of the City by residents and visitors. In order to support the City Centre economy, tourism, legibility and visual amenity it is important that the transport nodal points are redeveloped to a high standard.

**Policy: G15: Gulls**

**All viable non-lethal humane steps to prevent gull roosting, nesting and damage should be taken. Gull mitigations measures shall be well designed and sympathetic to the building and its setting.**

Gloucester's large urban gull population cause disturbance and damage to buildings, through their excrement, nesting, and from their mating ritual of dropping stones on glazing and other shiny materials. They are a nuisance to residents and visitors and can be particularly aggressive at certain times of the year. All viable non-lethal steps should be taken on new development to prevent exacerbation of this problem. Ideally, gull mitigation should be considered from the outset. Design advice and advice on suitable non-lethal mitigation measures can be found in Gulls – How to Stop Them Nesting on Your Roof produced by Gloucester City Council.

**Policy G16: Design and Climate Change**

**The development achieves a high quality design which demonstrates through its siting, orientation, layout and minimised energy consumption a high level of environmental awareness which contributes positively to climate change mitigation and adaptation.**

Climate change is one of the greatest challenges the world is facing and a key priority for Gloucester's future. Mitigating the emissions which cause climate change through reducing energy use is important to protect against the impacts of climate change which in the long term could affect the city's character and amenity.

New development should provide the opportunity to meet the highest standards of energy efficiency and minimise carbon emissions. Adapting to climate change means that we are better prepared for the following possibilities; increased frequency and severity of flooding, water shortages, hotter summers, rising energy costs and increased risk of damage to homes and infrastructure.

**Policy G17: Views of the Cathedral**

**The development does not harm any key views of the Cathedral and other historic places of worship identified and protected in the Heights of Buildings SPD and any subsequent amendments.**

Views of key historic landmark buildings act as way finders and improve the legibility of the city. They also contribute to the city's identity and sense of place. They make Gloucester unique and are a special distinctive part of the skyline.

**Please see the Health and Wellbeing section E, for other design based policies such as Outdoor Amenity and Garden Space, Active Design, and Suicide Prevention policies.**

## H: Sustainable Transport

### Policies in this section:

Policy H1: Sustainable Transport

---

#### Key Issues:

- car parking – particular issues include parking on housing developments designed under the restrictions of PPG3, and parking in densely populated Victorian areas of the city.
- Poor access to the canal frontage and natural assets such as Robinswood Hill.
- Traffic congestion along some key routes – Bristol Road, Cheltenham Road and roundabout, Elmbridge Court roundabout (the most congested junction in the County)
- Poor public transport connectivity in Matson and Robinswood ward to the centre and the expense of public transport journeys.
- Air Quality Management Areas – demonstrating poor air quality in some areas along road ways.
- Opportunities to improve the footpath and cycle network.

The key transport infrastructure issues for the City are therefore mainly improvements to the existing transport network to help facilitate the growth provided through city centre urban regeneration initiatives, and the peripheral urban extensions to the north of Gloucester at Innsworth and Churchdown, and to the south of Gloucester at St Barnabus roundabout and at the Hunts Grove urban extension.issues:

A background topic paper on Sustainable Transport can be found on the council's website by visiting [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

---

#### Key evidence:

Local Transport Plan

---

#### Other relevant strategies:

Gloucestershire Manual for Streets

---

#### Relevant National Planning Policy Framework paragraphs:

Chapter 4,

---

#### Relevant policies from the JCS:

INF1: Access to the Transport Network  
 INF2: Safety and Efficiency of the Transport Network  
 INF3: Flood Risk Management  
 INF4: Green Infrastructure  
 INF5: Social and Community Infrastructure  
 INF6: Renewable Energy/Low Carbon Development  
 INF7: Infrastructure Delivery  
 INF8: Infrastructure Contributions

Of particular relevance for Sustainable Transport in the City Plan are INF1 and INF2 covering access, safety and efficiency issues for the transport network. Policy SD5 criterion 7 and table SD5a is also relevant and seeks to transfer to non-car modes. There is also a JCS transport strategy which provides an important strategic context and key local projects.

---

#### JCS strategic objectives met:

Strategic Objective 7 – Promoting Sustainable Transport

---

#### Key City Plan principles met:

2, 13, 14

---

Insert images here

---

**Policy H1: Sustainable Transport**

**The Council will work closely with Gloucestershire County Council and other organisations with regard to all local transport matters. The Council will take direction from both the transport strategy and policies of the JCS and the Gloucestershire Transport Plan (2015-2031) with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the City. The policies set out in the JCS and the Gloucestershire Transport Plan will also be used with regard to development management matters and planning application decision making.**

**New development shall provide car parking and cycle provision in accordance with the guidance provided in Gloucestershire Manual for Streets 4th Edition 2016 and any subsequent amendments. The City Council supports and encourages improvements to the sustainable transport network including access to the open spaces, and our natural assets such as the River and Canal, Robinswood Hill, Alney Island and the open countryside.**

The provision of transport projects and improvements is a fast moving and changing activity and closely linked to more general development delivery activities especially those that are planned through the JCS. Setting policies in the city plan for each specific piece of potential transport infrastructure is not considered necessary and would become out of date very quickly. The Local Transport Plan performs this role better than the City Plan can, and will be frequently updated. The JCS also provides a transport strategy and policy context for the consideration of transport issues in the development management process. This is appropriate given the significance of joint working in the county and the likelihood that this will continue.

Further information on Car Parking in new residential developments, Cycle Storage, Active Design, Air Quality and Pollution can be found in the Design and Health and Wellbeing Topic Papers.

**I: Infrastructure****Policies in this section:**

Policy I1: Infrastructure

Policy I2: Schools and Other Education Needs

**Key evidence:**

JCS Submission document

JCS Infrastructure Delivery Plan

JCS Interim Inspector report

Gloucestershire Local Transport Plan

JCS Transport strategy

**Other relevant strategies:****Relevant National Planning Policy Framework paragraphs:**

7, 17, 21, 31, 41, chapter 5, 156, 157, 162

**Relevant policies from the JCS:**

INF1: Access to the Transport Network

INF2: Safety and Efficiency of the Transport Network

INF3: Flood Risk Management

INF4: Green Infrastructure

INF5: Social and Community Infrastructure

INF6: Renewable Energy/Low Carbon Development

INF7: Infrastructure Delivery

INF8: Infrastructure Contributions

**JCS strategic objectives met:**

Strategic Objective 5: Ensure that all new developments are valued by residents by integrating them well with existing communities and provide well located infrastructure which meets the needs of residents.

**Key City Plan principles met:**

2, 5, 8, 13, 14

Gloucester's future infrastructure needs are being assessed in coordination with key infrastructure providers including Gloucestershire County Council, the Environment Agency and health providers. Infrastructure delivery at the local level is fundamental for City Plan and through investigations to date with key providers on major sites a number of key infrastructure issues have been identified including:

- Flooding infrastructure: Especially in terms of protection from the River Severn in the vicinity of the Blackfriars regeneration site and the city centre, through the Quayside flood alleviation scheme and Housing Zone funding
- Schooling infrastructure: In the short term, addressing the shortage of primary school places and catering for housing growth in the south of the city. In the medium term, catering for growth to the north of Gloucester being provided through the JCS and the impending shortage of secondary school places.
- Health care facilities for a growing and aging population; addressing the changing health care environment and demands.
- Transport infrastructure: Mainly improvements to the existing transport network to help facilitate the growth provided through city centre urban regeneration initiatives, and the peripheral urban extensions to the north of Gloucester at Innsworth and Churchdown and to the south of Gloucester at Hunts Grove.
- Community Infrastructure Levy (CIL) pooled funds regime introduction, and the continuation of the s106 mechanism for site specific infrastructure requirements.

**Policy I1: Infrastructure**

**Infrastructure provision in Gloucester will reflect the council's priorities for infrastructure set out in the JCS, LTP and the Infrastructure Delivery Plan. The council will focus on the delivery of infrastructure for the following:**

- **new primary and secondary school capacity to the north and south of Gloucester;**
- **new health care facilities to support an expanding population;**
- **new transport infrastructure projects contained within the Gloucestershire LTP;**
- **new and enhanced green infrastructure, playing pitches and open space;**
- **new flood defence infrastructure capacity in the city centre and at Blackfriars; and**
- **other infrastructure items identified over time and through the IDP.**

**Public and private sector infrastructure providers should work closely with the council to deliver local infrastructure needs. The council will aim to refresh the IDP on a regular basis, and this will require the cooperation and involvement of all the local infrastructure providers.**

*Infrastructure provision is a fast moving and changing activity and closely linked to strategic planning and ongoing local delivery activities. Setting separate policies in the city plan for each specific piece of potential infrastructure is not considered necessary. The draft policy sets out the key priorities for Gloucester, and a list of the priority infrastructure projects will be included in the Regulation 123 list for funding through the CIL mechanism. Our CIL charging schedule will be Examined separately in the context of the strategy and policies of the JCS.*

**Policy I2: Schools and Other Education Needs**

**There is a particular need for new primary and secondary schools in Gloucester. The Council intends to work with the County Council and other partners to ensure that these needs are met. New school buildings should be located in sustainable locations and the co-location of other services and facilities with schools will be encouraged.**

**The Council will also look to meet Gloucester's needs for: Nurseries, Pre-schools, Special schools, Free schools, Community learning and life long learning facilities, Further and higher education facilities and other facilities which provide for education and promote the development of skills.**

*Guided by the County Council as LEA, the provision of new schools and the growth plans of existing schools in Gloucester will be supported in line with good planning and sustainability objectives. It is recognised that good schools, which are appropriately located, have a vital role to play in maintaining and improving the quality of life of communities across the City.*

*The Council will seek to ensure that the design of new schools is flexible enough to accommodate the changing needs of students and nearby communities. Out of hours, the use of school/college buildings and land will be encouraged to support learning among the wider community and to increase access to opportunities for recreation and sports.*

*The Council will support proposals for a new University Technology College which is proposed on Site SA09 on Great Western Road. This is regarded as an opportunity to strengthen the education and skills base of the City.*

#### 4.0 Proposed land allocations

- 4.1 Gloucester as a City is growing and constantly changing. Its population needs new housing, new job opportunities, access to shops, transport modes and community facilities such as schools, colleges, health care, parks and gardens / areas for sports and recreation. We all want to live in a pleasant and healthy environment and so when planning for the future it is important that areas of landscape and biodiversity value are protected. Gloucester has a rich heritage and it is important that this is preserved for present and future generations to enjoy.
- 4.2 There is a significant demand for new homes and land to provide for new jobs in Gloucester, and indeed in the UK as a whole. It is important that the Gloucester City Plan (GCP), along with the JCS, identifies land to provide for the quantity, quality and type of new homes and jobs needed by the local community and to support economic growth.
- 4.3 The Government requires local authorities to plan for the amount of development to be delivered in their areas to ‘...proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.’ It goes on to state that ‘Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’<sup>24</sup>

#### Establishing Gloucester’s development needs

- 4.4 The overall level of new homes, jobs and retail floorspace has been set by the Joint Core Strategy (JCS) between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. This process has been informed by a considerable amount of evidence and debate at the JCS examination. Further detail regarding this is available to view in the associated ‘Development need and sites’ topic paper and from the JCS website at [www.gct-jcs.org](http://www.gct-jcs.org).
- 4.5 The development requirements for Gloucester are; 14,359 new homes and 45,000 sq. m (net) of new retail floorspace (see policies SP1, SD2 and SD3 of the JCS). Gloucester is also required to provide for a share, with its JCS partners, of 192 hectares of B-Class employment land to support approximately 39,500 new jobs. Other evidence has been prepared, or is being prepared, to identify the right type and tenure the new homes should be, as well as the economic sectors that will contribute positively towards the growth of the City’s economy in the future. Where available, this evidence has been used to inform other policies in either the JCS or City Plan and will be important in informing the assessment of future planning applications.

#### Gloucester’s land supply

##### *Housing*

- 4.6 Approximately half of Gloucester’s need for new homes will be provided for at ‘strategic allocations’ identified through the JCS; some of these sites will also make a significant contribution to the employment land needs of the City. Sites located in Tewkesbury Borough that provide for Gloucester’s housing need are located at Innsworth, Twigworth, South Churchdown and Brockworth and all provide for at least 1,000 dwellings (Please note this is currently under negotiation and has yet to signed off by all three authorities. A further update to this paragraph will be provided between SMT and Planning Policy Sub). Land off Winnycroft Lane in Gloucester City<sup>25</sup> is also identified as a strategic allocation in the JCS for 620 homes. Some of these sites already have planning permission and will make a positive contribution to Gloucester’s housing and employment land supply throughout the timeframe of the plan to 2031.

<sup>24</sup> National Planning Policy Framework, paragraph 17

<sup>25</sup> Joint Core Strategy, Main Modifications, October 2016

- 4.7 Some of the housing needs of Gloucester for the plan period have already been provided for, with the sites being granted planning permission and built out, or to be built out in the future. These are known as ‘commitments’ and any that have been granted planning permission since the start of the JCS plan period in 2011 will count towards the City’s identified needs – unless they have expired (where planning permission was granted but not implemented).
- 4.8 When considering potential supply, the Council has also made a small allowance for ‘windfall’ sites. These are sites that are not allocated for development by the local authority but that arise on an ad hoc basis. When this happens their suitability is assessed against the relevant policies in the Local Plan.
- 4.9 In addition however it is necessary for the City Council to identify further sites, in order to make a significant contribution to providing for the needs of the City. This fits with the agreed JCS spatial strategy of providing for needs where they arise and maximising the amount of development provided for within the existing urban areas. These sites are identified in the City Plan and further information provided in the rest of this chapter.
- 4.10 Overall, the supply of housing for Gloucester City is summarised in the following table.

Completions – developed since 2011	2,526
Commitments	2,216
Windfall Allowance	832
Gloucester City Plan – proposed allocations	1,937
JCS Strategic Allocations (Gloucester City)	620
JCS Strategic allocations (within Tewkesbury borough)	5,262
<b>Total</b>	<b>13,394</b>

**Table 1: Current housing supply for Gloucester City**

### ***Traveller communities***

- 4.11 The City has also identified needs for the Gypsy / Traveller and Travelling Showpeople community. The most recent evidence shows a need for two pitches for the gypsy / traveller community and up to 16 yards for the travelling showpeople community between 2016 and 2031.
- 4.12 At the time of writing, the City Council is undertaking investigatory work to establish if a site known as the ‘Former Town Ham allotments’ is capable of being delivered for the travelling showpeople community – see site SA22 below. However at present there are no known site opportunities to provide for the gypsy / traveller community needs.

### ***Employment and retail***

- 4.13 Reflecting the NPPF, the JCS employment policy considers employment in its widest sense covering traditional industrial, office and warehousing (B1,B2 and B8 uses) as well as uses such as hotels, tourism, leisure facilities, education and health services which are also large employment providers in the area. Policy SD2 supports employment related development in a number of suitable locations but through Strategic Allocation linking new housing to new employment. For Gloucester this means the north of the City at Innsworth and at South Churchdown. The approved planning application at Brockworth strategic allocation also includes an element of employment land adjacent to the M5 motorway.

The City’s current employment provision is principally focused within the Bristol Road corridor (including Green Farm and Olympus Park), the City Centre, Barnwood Business Park, the Eastern

Avenue gateway and Waterwells Business Park. These areas should remain as focus for local employment and principally for B Class employment uses.

- 4.14 Currently an Economic Development Strategy is being produced to inform City Plan, and to ensure that the emerging strategy complements the supports relevant strategies which operate across Gloucester, helping to build on the City's clear strengths and growth areas.
- 4.15 The JCS proposes that the JCS area should accommodate a minimum of 192 ha of employment land (from proposed JCS allocations, existing local plan allocations, existing commitments and proposed new Local Plan employment allocations. Additionally, the JCS should support a jobs target of 39,500 for the period 2011 to 2031. The Inspector comments that 238 ha of employment land is available across the JCS area with 56 ha around Gloucester and a capacity of 20 ha of existing undeveloped capacity in Gloucester City together with 7 hectares made up of other available and suitable sites.

These figures point to the need to ensure that existing employment land commitments and proposed City Plan employment allocations need to be retained as appropriate for employment purposes in order to maintain a suitable supply of sites within Gloucester City and the JCS area as a whole for the plan period up to 2031.

- 4.16 The JCS sets out a need for approximately 41,600 sq. m (net) of comparison goods floorspace (non-food goods such as clothing, footwear, electrical, DIY, furniture and home wear) and 3,700 sq. m net of convenience goods floorspace (food items) between 2016 and 2031.
- 4.17 At the time of writing there are a number of commitments in place that absorb some of this retail floorspace requirement. In addition, the section that follows identifies several sites within the 'Primary Shopping Area' (PSA)<sup>26</sup> that have the potential to deliver some of the floorspace needs, including for example King's Quarter and land adjacent to the Eastgate Shopping Centre. However there is a need to identify further appropriate sites, in accordance with the sequential test and impact test. As set out in the vision and key principles section of this document, it is important to make sure that future allocations for retail development support the regeneration of the City Centre and, if located in an out-of-centre location, complement and do not undermine the PSA or other designated retail centres. Any sites submitted as part of the 'call for sites' (see below) will be tested and assessed as part of an overarching strategy for the City Centre.

### **Call for sites**

- 4.18 This section of the consultation document sets out a range of proposed site allocations for the City. However, given the constrained nature of Gloucester's administrative area, the City Council is interested to hear of any other potential development sites that exist. These will then be factored into the next iteration of the Council's Strategic Assessment of Land Availability (SALA). We ask that when a site is submitted for consideration, it is accompanied with a completed proforma, which is available to download from the City Council's website at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

### **Proposed allocations**

- 4.19 In May 2013 the City Council consulted on the City Plan Part 2: Places, Sites & the City Centre Strategy. Part 2 of the City Plan presented a comprehensive analysis of Gloucester's development needs and opportunities. Since this time, some of the site opportunities identified have been developed or are now a commitment (i.e. granted planning permission but not yet developed) and will not therefore form a proposed allocation. Equally, other sites have been submitted to the Council as part of the SALA process and, where found to be deliverable, have now been identified as a proposed allocation in the schedule that follows. Further information on the assessment of

---

<sup>26</sup> See Policy C1.



proposed site allocations is available in the 'Development need and sites' topic paper and by referring to the most recently published SALA from 2016<sup>27</sup>.

4.20 A summary of proposed site allocations is provided in the table below. The associated plans showing the extent of the sites is available separately.

Summary of Site Allocations						
Ref No.	2013 Consultation Ref No.	SALA Ref No.	Site Name	Ward	Gross Area (ha) ----- Potential Capacity	Proposed Development
SA01	A2	SUB09	Land at 'The Wheatridge'	Abbeydale	2.28 ha --- 50 units	Residential / Educational
SA02	Not in	SUB25	Barnwood Manor, Barnwood Road	Barnwood	1.95 ha --- /	Residential
SA03	B2	SUB56	Gloucester Mail Centre, Eastern Avenue	Barnwood	2.25 ha --- /	Employment
SA04	E2	SUB04	Helipebs, Sisson Road	Elmbridge	1.6 ha --- 50 - 60 units	Residential
SA05	Not in	SUB43	Allstone site, Myers Road	Elmbridge	5.26 ha --- 250 units	Residential
SA06	KW1	SUB52	Former Civil Service Club, off Estcourt Road	Kingsholm & Wotton	3.6 ha --- 20 units	Residential
SA07	KW4	ED044	67-69 London Road	Kingsholm & Wotton	0.35 ha --- 30 units	Residential
SA08	KW5	SUB51	Wessex House off Great Western Road	Kingsholm & Wotton	0.25 ha --- 20	Residential / Mixed use / Educational use
SA09	KW8	HA20	Great Western Road Sidings	Kingsholm & Wotton	4.34 ha --- 100	University Technical College (UTC) on part / also Residential / Mixed use
SA10	L2	HA26	Land off Leven Close	Longlevens	1.4 ha --- 20 units	Residential

<sup>27</sup> Gloucester Strategic Assessment of Land Availability, March 2016.

SA11	Not in	FS13	Land Adjacent to St Aldates	Matson & Robinswood	0.5 ha	Residential
SA12	Not in	/	Blackbridge Sports Hub, off Podsmead Road	Podsmead	10.47 ha --- /	Sports Hub
SA13	QF1	EA03	Land east of Waterwells Business Park	Quedgeley Fieldcourt	6.1 ha for residential / 1.8 ha for employment --- 150 units	Residential on two southern portions / Employment on northern section
SA14	QSV1	SUB18	Land at Clearwater Drive	Quedgeley Severnvale	2.09 ha --- 15 units	School or possibly residential
SA15	WN4	HA02	King's Quarter	Westgate (City Centre)	2.2 ha --- 50 units	Retail, Market hall, Residential & Other uses
SA16	WN3	HA17	Greater Blackfriars	Westgate (City Centre)	4.8 ha --- 400 units	Retail, Other City Centre Uses, Residential
SA17	WN6	FS02	Southgate Moorings off Commercial Road	Westgate (City Centre)	0.5 ha --- 40 units	Mixed use development including residential
SA18	WN2	FS10	104 Northgate Street	Westgate (City Centre)	0.06 ha --- 20 units	Residential & Commercial
SA19	Not in	FS16	Land adjacent to Eastgate Shopping Centre	Westgate (North)	0.32 ha --- /	Retail
SA20	Not in	SUB28	Land at St Oswalds	Westgate (North)	2.5 ha --- 60 units	Residential
SA21	Not in	/	Former Town Ham Allotments off Westend Parade	Westgate (North)	1.1 ha --- /	Extension to existing site for Travelling Showpeople
SA22	WS11	EA04	Secunda Way Industrial Estate	Westgate (South)	0.7 ha --- /	Employment
SA23	WS14	SUB54	Land at Rea Lane, Hempsted	Westgate (South)	1.5 ha --- 35 units	Residential

Table 2: Schedule of proposed site allocations

- 4.21 The following section provides further information on each of the proposed site allocations. In keeping with the approach taken in the City Plan Part 2 consultation in 2013, the sites are presented in ward order. This allows for the consideration of the specific issues and characteristics of each ward and whether the proposed site allocation could help to address any of the ward issues. The evidence for this is contained within the 'Ward Profiles', which are available to download from the evidence base section of the City Council's website<sup>28</sup>.
- 4.22 For each ward a short summary of its characteristics is provided, followed by a schedule of all proposed site allocations within it. For each site, key information including a description, site area, development constraints, results from the Sustainability Appraisal and feedback from the previous consultations is set out. It then goes on to detail the proposed site allocation and any site specific requirements that will be expected within a proposal. It is important to note that in addition to this, any development proposals would be subject to the requirements of other policies contained in the local planning framework – i.e. from both the JCS and the Gloucester City Plan.
- 4.23 There are no proposed site allocations in Abbeymead, Barton & Tredworth, Coney Hill, Grange, Kingsway, Moreland and Tuffley wards.

---

<sup>28</sup> Ward Profiles 2013, Gloucester City Council

**Abbeydale Ward**

- 4.24 Abbeydale is one of Gloucester's smaller wards. It was formerly part of the larger 'Abbey Ward' but in recent boundary changes 'Abbey' was split into Abbeymead to the west (including part of Hucclecote) and Abbeydale to the east. Abbeydale is a popular area of the city with good quality modern housing stock and facilities. The ward is constrained by the M5 motorway on its southern boundary, but has functional links with Upton St Leonards in Stroud District.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA01: Land at 'The Wheatridge'</b>
<b>Site description and overview:</b> The site is a greenfield site. It is currently vacant, grassed land surrounded by residential development on all sides. There are a number of mature trees on the boundary and in the centre of the site. This site was included as a development opportunity in the 2013 City Plan Sites consultation.
<b>Gross site area:</b> 2.28 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• This part of Abbey/Upton currently suffers from a general lack of public open space, and it is critical to the local people and wildlife that this area is left untouched.</li> <li>• Need for open space, used by dog walkers, pedestrians, horses.</li> <li>• It's a nature corridor and habitats for wildlife will be lost.</li> <li>• Concerns about the impact on the road junction.</li> <li>• Any development should be small, keep as much of the field as possible.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential development of up to 50 dwellings with formal public open space. The site is also potentially suitable for educational use.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• The site has unknown archaeological potential. Further archaeological assessment may be required.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Minor negative SA scores for soil quality and landscape.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• At least 50 dwellings.</li> <li>• New public open space.</li> <li>• Neighbourhood area for children's play.</li> <li>• Archaeological assessment.</li> </ul>

**Barnwood Ward**

- 4.25 Barnwood Ward is a large and varied Gloucester ward. It includes popular residential areas with good schools and facilities. The northern part of the ward hosts some of Gloucester's significant employers namely: Unilever's Walls factory and the EDF Energy offices. In recent boundary changes Coney Hill Ward has been formed out of the south west part of Barnwood.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA02: Barnwood Manor, Barnwood Road</b>
<b>Site description and overview:</b> Occupied and functioning sheltered retirement accommodation. The nursing home is not included in the development area and would remain. The site is situated in a predominantly residential area and would provide the opportunity for the intensification of residential use whilst protecting the setting of the Listed Barnwood Manor.

<b>Gross site area:</b> 1.95 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Not subject to consultation.</li> </ul>
<b>Proposed allocation:</b> Residential development of up to 20 dwellings.
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Development within the curtilage of a Listed building and would impact on the setting.</li> <li>• Part of the site is in Flood Zone 2.</li> <li>• Trees with Tree Preservation Orders.</li> <li>• An area of high archaeological potential.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Major negative SA scores for health. Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive. Minor negative SA scores for soil quality and townscape / landscape.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• Up to 20 residential dwellings.</li> <li>• Enhanced pedestrian permeability needed through site.</li> <li>• Equipped children's play areas.</li> <li>• Built heritage and archaeological assessment.</li> </ul>
<b>SA03: Gloucester Mail Centre, Eastern Avenue</b>
<b>Site description and overview:</b> Site of former Royal Mail sorting office and distribution centre. When operating fully the site had various different employment types including office and storage and distribution. Part of the site is currently still occupied and use for storage and distribution. The site is surrounded by employment uses and the line railway line to the west with no connectivity to surrounding residential uses. Given its location and surrounding uses it is not considered suitable for residential development but offers the opportunity for redevelopment in whole or in part to provide for a different form of B Use Class employment.
<b>Gross site area:</b> 2.25 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Site is known as Gloucester Mail Centre.</li> <li>• At present nearby uses include retail, residential, a drive through restaurant as well as warehousing and offices. So, Royal Mail considers that the area should be characterised as mixed use.</li> <li>• No evidence of 'possible contamination' on site.</li> <li>• The references to the traffic capacity of the Walls and C&amp;G roundabouts is not a site specific issue and should also be deleted. It is noted that this issue is not noted in the schedule entries for sites B1 and B2, which is inconsistent. The Mail centre site's existing single vehicular access to the north bound carriageway of the A38 Eastern Avenue is a constraint and should be added.</li> <li>• There is an extensive planning history for this site going back to 1955. The site is 'Sui generis' use but effectively a B class use.</li> <li>• The Proposed uses section should be amended to read as follows: '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.'</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Employment use.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Western boundary of the site is mainline railway, so potential noise and vibration issues.</li> <li>• Local heritage value and potential archaeological investigations may be needed.</li> </ul>
<b>Sustainability Appraisal findings:</b>

<ul style="list-style-type: none"> <li>• Yet to be assessed.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• Build heritage and archaeological assessment.</li> </ul>

### Elmbridge Ward

4.26 Elmbridge used to be one of Gloucester's smaller wards but it has increased in area as a result of recent boundary changes. The south west of the ward now includes Armscroft Park and the northern railway triangle which were previously in Kingsholm and Wotton. The ward has a close relationship with the neighbouring wards of Barnwood and Longlevens. The ward contains popular schools and community facilities. Generally crime levels are low and household incomes are above the UK average.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA04: Helipebs, Sisson Road</b>
<b>Site description and overview:</b> This is an occupied and functioning industrial site. It is surrounded by residential uses and public open space. Industrial uses are located across the railway line to the west. Whilst an existing employment site, it is understood that the occupier has found alternative accommodation within the City. Given the proximity to other residential dwellings (most of Sisson Road) it is considered that redevelopment to provide further residential dwellings is the most suitable alternative use.
<b>Gross site area:</b> 1.6 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• This is a functioning site and should not therefore be allocated.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential development, 53 dwellings.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Potential contamination issues.</li> <li>• Impact on local industrial heritage.</li> <li>• The site is adjacent to the railway and industrial uses so potential noise and vibration issues.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• No negative SA scores given.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• At least 53 residential dwellings.</li> <li>• Neighbourhood area for children's play.</li> </ul>
<b>SA05: Allstone site, Myers Road</b>
<b>Site description and overview:</b> This is an occupied and functioning aggregate and waste recycling facility. Surrounded by industry / employment, residential, railway line and public open space. Relocation of existing uses to an appropriate alternative site required to make the site available for residential development.
<b>Gross site area:</b> 5.26 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• None - Not included in the consultation.</li> </ul>
<b>Proposed allocation:</b> Residential development of up to 250 dwellings.
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Flood risk on a small portion of the site nearest to Wotton Brook.</li> <li>• Area of Principal Archaeological Interest.</li> <li>• Potential contamination issues.</li> </ul>

<ul style="list-style-type: none"> <li>• Impact on local industrial heritage.</li> <li>• Adjacent to railway and other industrial uses so potential noise and vibration issues.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Minor negative SA scores for sustainable transport and traffic.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• Around 250 dwellings to include affordable units.</li> <li>• Strategic cycle/footway link to the city centre to link with GWR sidings cycle/footway.</li> <li>• Public open space.</li> <li>• Equipped children's play areas.</li> <li>• Contribution to formal sport.</li> </ul>

### ***Kingsholm and Wotton Ward***

4.27 As a result of recent boundary changes, Kingsholm and Wotton Ward has recently reduced in size. The ward is varied and interesting in terms of housing stock and neighbourhoods. It is close to the city centre and contains the city's railway station and main hospital - Gloucester Royal Hospital. The ward is also home to Kingsholm Rugby Stadium; which is an important part of Gloucester's cultural life and identity.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA06: Former Civil Service Club, off Estcourt Road</b>
<b>Site description and overview:</b> Former sports pitches and facilities including changing rooms and a club house that has been lying vacant for a number of years. Accessed from Estcourt Road, bounded by Denmark Road and Kingsholm Conservation Area to west, south and east. The adopted Gloucester Playing Pitch Strategy (PPS) identifies a shortfall of playing fields in the City to provide for current and future needs. However, the site has been sold to a housing development and there is very little chance that the site will be reinstated for community sports use. With this mind, the Council will consider the redevelopment of part or the entire site provided that significant contributions are made to the developer of what sports facilities would be lost from the site and the needs identified in the PPS. This could take the form of: retained playing pitches and ancillary facilities on part of the site as well as financial contributions to improve existing facilities elsewhere and/or the redevelopment of the whole site but with significant financial contributions for sports facilities elsewhere.
<b>Gross site area:</b> 3.6 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Concern regarding the loss of the playing fields and open space.</li> <li>• Consider as potential location for Gloucester City Football Club.</li> <li>• Well located in relation to the City Centre, but potential to generate a significant number of trips that will need to be considered.</li> <li>• Need to check BGS maps for this site.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential development of up to 60 dwellings.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Flood risk (majority of site is in Flood Zone 2).</li> <li>• Conservation areas to south, east and west.</li> <li>• Previous use of playing fields and ancillary facilities.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Major negative SA scores for flood risk. Problematical and improbable because of</li> </ul>

known sustainability issues; mitigation likely to be difficult and/or expensive.
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• Up to 60 dwellings.</li> <li>• New public open space.</li> <li>• New contribution to formal sports provision.</li> <li>• Neighbourhood play area for children.</li> </ul>
<b>SA07: 67-69 London Road</b>
<p><b>Site description and overview:</b></p> <p>This is a small brownfield site with residential uses to the north, west and east and BBC Gloucestershire studios to the south. The site currently has two long-term vacant office units and there is an opportunity for demolition and redevelopment for residential development. The site is located in close proximity to the City Centre and has excellent links to the sustainable transport network.</p>
<b>Gross site area:</b> 0.35 ha.
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• No comments specific to this site.</li> </ul>
<p><b>Proposed allocation:</b></p> <ul style="list-style-type: none"> <li>• Residential development of at least 30 dwellings.</li> </ul>
<p><b>Constraints:</b></p> <ul style="list-style-type: none"> <li>• London Road Conservation Area.</li> <li>• Archaeological potential owing to proximity of Roman Road</li> <li>• Mature trees located around periphery of site.</li> </ul>
<p><b>Sustainability Appraisal findings:</b></p> <p>No negative SA scores given.</p>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• Redevelopment of a brownfield site to include approximately 30 dwellings.</li> <li>• Retention of TPO trees at site.</li> </ul>
<b>SA08: Wessex House, off Great Western Road</b>
<p><b>Site description and overview:</b></p> <p>This site has been vacant for a considerable period of time and was previously used as an electrical wholesalers - Edmundson Electrical Ltd. It is located in close proximity to Gloucestershire Royal Hospital and has connections to other uses within the wider area including residential and business and is located within the boundary of the Housing Zone. It is also located in very close proximity to the City Centre and has excellent access to the sustainable transport network, being adjacent to the bus and rail interchange (which will be subject to significant improvements as part of the King's Quarter redevelopment). There is however a poor connection to the City Centre and the station via an underpass which is in need of significant improvements. The site offers the opportunity for redevelopment to provide for a range of uses, including residential or employment.</p>
<b>Gross site area:</b> 0.25 ha.
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• There were no comments specific to this site.</li> </ul>
<p><b>Proposed allocation:</b></p> <ul style="list-style-type: none"> <li>• Residential or employment.</li> <li>• Potential for educational use.</li> </ul>
<p><b>Constraints:</b></p> <ul style="list-style-type: none"> <li>• Area of Principal Archaeological Interest.</li> <li>• Noise and vibration from railway.</li> <li>• Possible contamination from former railway uses.</li> </ul>
<p><b>Sustainability Appraisal findings:</b></p> <p>Minor negative impacts on sustainable transport and traffic.</p>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• Redevelopment of a brownfield site to include residential units.</li> <li>• Improvements to station underpass.</li> </ul>



<b>SA09: Great Western Road Sidings</b>
<b>Site description and overview:</b> Extensive area of railways sidings to the south of Great Western Road and north of Metz Way. The site contains vacant and redundant buildings, railway tracks and open scrubby land. Access is from Great Western Road. The site is still in operational use by Network Rail, but is being marketed and may in future be accessible to the Homes and Communities Agency (HCA). The HCA are actively looking to accelerate housing delivery at this site as lies within Gloucester City Housing Zone. Freight sidings are either currently being relocated to southern triangle or there is a future plan to undertake this. As of September/October 2016, the University of Gloucestershire has proposed using part of the site (1.15 ha) directly opposite Gloucestershire Royal Hospital's main entrance for a University Technical College. Their proposals include a new 3 storey building, car parking, landscaping and 2 five a-side football pitches.
<b>Gross site area:</b> 4.34 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>The site would be opened up if a new entrance to the station were to be provided giving access onto platform 4.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>University Technical College.</li> <li>Residential development, 100 dwellings.</li> <li>Whole site may lend itself well to employment development.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>Noise, vibration &amp; air pollution from railway..</li> <li>Area of Principal Archaeological Interest.</li> <li>Contamination from former railway use.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>Minor negative impacts on sustainable transport &amp; traffic.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>University Technical College</li> <li>100 dwellings.</li> <li>New strategic cycle and footway linking to City Centre and to any future development on Site SA05, Allstone site, Myers Road.</li> <li>Large children's play area.</li> <li>Formal sport provision.</li> <li>Public open space.</li> </ul>

### **Longlevens Ward**

- 4.28 Longlevens is an attractive suburb to the north of the City. It has a good quality housing stock and good facilities such as an excellent library, popular primary schools, sports facilities and shops. The ward is also home to the University of Gloucestershire. There are good public transport links to the City Centre and also to Churchdown and Cheltenham.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA10: Land off Leven Close</b>
<b>Site description and overview:</b> The site is a former playing field/pitch surrounded by residential uses. Access to the site is locked and therefore it is not public open space. Current access is off Paygrove Lane. The site is in close proximity to Longlevens Infant School. It was previously used as playing fields for use by the wider community and local schools. It is understood however that this was a significant time ago. The site offers the opportunity for a limited amount of residential development whilst retaining a significant amount of public open space and /or playing pitches for use by the wider community.
<b>Gross site area:</b> 1.4 ha.
<b>Summary of responses to previous consultation:</b>

<ul style="list-style-type: none"> <li>• Loss of playing fields will be detrimental.</li> <li>• Need to check BGS maps for this site.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• A residential development of 20 dwellings with open space.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• No obvious constraints.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Potential minor negative impacts on the historic environment.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 20 dwellings.</li> <li>• Comprehensive SUDS scheme required.</li> </ul>

### **Matson and Robinswood Ward**

4.29 Matson and Robinswood Ward is located to the south of the city with the southern boundary abutting the M5 motorway. Much of the housing stock is post-war social housing and the layout and built form of the ward is strongly influenced by Robinswood Hill which dominates the western third. The ward (and particularly Matson estate) contains high levels of deprivation, low household incomes, a high number of benefit claimants and a lack of employment opportunities. On the positive side, Matson's residents are fortunate to have good community facilities and easy access to public open space and beautiful rural areas.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA11: Land Adjacent to St Aldates</b>
<b>Site description and overview:</b> The site is in a residential area. On site is a former church hall which was originally a mission building for the local community. Now this wooden structure is in a poor state of repair. Demolition of this structure would release land for development along with part of vicarage grounds & release funds for repair of the listed St Aldates building.
<b>Gross site area:</b> 0.5 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• None – not included in the consultation.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential development, 20 dwellings.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Adjacent to Grade II* Listed Building.</li> <li>• Loss of existing community facility to be assessed against policy.</li> <li>• TPO trees on site</li> <li>• Parking required for residents and for church /community use.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Minor negative impacts on soil quality and landscape / townscape.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 20 dwellings.</li> <li>• Equipped children's play area.</li> <li>• Community uses could be accommodated in the church building, post development.</li> </ul>

### **Podsmead Ward**

4.30 In terms of land area, Podsmead is one of the smallest wards in Gloucester. It has a strong sense of local identity and community as well as good levels of open space, playing pitches and community

facilities. It also has good public transport links, access to the canal and pleasant views to Robinswood Hill. However the ward also has some of the highest levels of deprivation in Gloucester and the highest proportion of people living in social rented housing in the City.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA12: Blackbridge Sports Hub</b>
<p><b>Site description and overview:</b> Playing field site with an actively used running track. Other than this the site is underused and has been identified in the adopted Gloucester Playing Pitch Strategy and Artificial Grass Pitch Strategy as being a significant opportunity for the creation of a sports hub to the southern half the City, to complement that being taken forward at the University of Gloucestershire and Oxstalls Sports Park. This could be in combination with adjacent sports pitches. The City Council, along with Active Gloucestershire, has recently committed funding to commission external support in preparing a feasibility study looking at potential improvements to existing pitches and the provision of new sports facilities. The site could be delivered in part through S106 and/or CIL contributions (once adopted).</p>
<p><b>Gross site area:</b> 10.47 ha.</p>
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• None – not included in the consultation.</li> </ul>
<p><b>Proposed allocation:</b></p> <ul style="list-style-type: none"> <li>• Multi-sports hub, potentially in combination with adjacent sports pitches / sites.</li> </ul>
<p><b>Constraints:</b></p> <ul style="list-style-type: none"> <li>• No major land-use constraints, although it is understood that parking and access arrangements are currently difficult.</li> </ul>
<p><b>Sustainability Appraisal results:</b></p> <ul style="list-style-type: none"> <li>• Yet to be assessed.</li> </ul>
<p><b>Site specific requirements:</b> To act as a sports hub for Gloucester. The exactly nature of this is yet to be determined but feasibility work is currently on-going. The site could be delivered in part through S106 and or CIL contributions (once adopted).</p>

### **Quedgeley Fieldcourt Ward**

4.31 Quedgeley Fieldcourt is the most southerly of Gloucester's wards. The ward is divided east and west by the A38. To the east is the older and more established area of Quedgeley, and to the west is the rapidly developing area of new housing and employment development. This area includes Waterwells Business Park, and major County Infrastructure namely the Gloucestershire Constabulary building and the Compass House Custody Suite.

**Note potential boundary changes, but see also: [2013 Ward Profile](#)**

<b>SA13: Land East of Waterwells Business Park</b>
<p><b>Site description and overview:</b> This is a greenfield site with a small number of dwellings in the centre. The site is bounded by the railway line to the east and by employment development (off Brunel Court and Marconi Drive) to the west. To the south lie open fields. Naas Lane runs through the site and provides access via a narrow railway tunnel to Brookthorpe and Colethorp in Stroud District. About one quarter of the site is consented for employment use.</p>
<p><b>Gross site area:</b> 6.1 ha for residential / 1.8 ha for employment</p>
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• Residential development will be the most appropriate on this site.</li> <li>• Evidence is needed to test the transport impact of this proposed allocation and in particular the additional traffic which would use Junction 12 of the M5. Additionally what mitigation measures will accompany the development?</li> </ul>

<ul style="list-style-type: none"> <li>• The site is better suited to residential development as opposed to employment use. Necessary community services are now becoming available in this area.</li> <li>• The best road/access through would be at the rear of Waterwells Business Park, but would be interested in looking at alternative routes in to the land.</li> </ul>
<b>Proposed allocation:</b> Residential development, 150 dwellings.
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Area of Principal Archaeological Interest.</li> <li>• Further built heritage and archaeological assessment required.</li> <li>• Part of the site is in Flood Zones 2 &amp; 3.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Major negative SA scores for soil quality. Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive.</li> <li>• Minor negative SA scores for townscape / landscape and health.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 150 dwellings.</li> <li>• Enhanced pedestrian routes to Kingsway.</li> <li>• Integration with Hunts Grove development (Stroud District).</li> <li>• Open space provision.</li> <li>• Equipped children's play area.</li> <li>• Contribution to formal sport.</li> </ul>

### **Quedgeley Severnvale Ward**

- 4.32 Quedgeley Severn Vale Ward is situated to the south west of the City and is the northern most ward in Quedgeley Parish, which also includes Quedgeley Fieldcourt ward. The ward is bounded to the west by the River Severn and is bisected by the Gloucester to Sharpness Canal which runs north east to south west through the ward. The predominant land use to the west of the canal is agriculture while residential development lies to the east of the canal. The employment areas of Green Farm and Olympus Park are situated in the north east of the ward.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA14: Land at Clearwater Drive</b>
<b>Site description and overview:</b> This is a greenfield site with residential development on three sides and the Gloucester/Sharpness canal to the north.
<b>Gross site area:</b> 2.09 ha.
<b>Summary of responses to previous consultation:</b> Partial development of this site ensuring that nature conservation assets are managed and enhanced long-term is accepted from a biodiversity perspective on this County Council owned site. The site is designated as a Key Wildlife Site and thus an ecological survey and assessment will be needed to inform any detailed development proposals that might come forward.
<b>Proposed allocation:</b> 2 Form Entry Free School.
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Half of site in Flood Zone 2.</li> <li>• Wildlife and nature conservation considerations (Key Wildlife Site) to north west of site.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Minor negative SA scores for biodiversity, soil quality and townscape/landscape.</li> </ul>

Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 2 Form Entry Free School.</li> <li>• Or 15-30 dwellings plus enhanced public open space provision.</li> <li>• Large children's play area.</li> </ul>

### **Westgate Ward (City Centre)**

- 4.33 Westgate ward is the largest ward in Gloucester in terms of land area. It is located to the northwest of the city and includes two distinct parts; the city centre and Hempsted. The city centre forms the historic core of Gloucester, with Roman occupation commencing in AD 65 – 70. The basic layout of the city, with its 'gate' streets was laid out at this time. The ward includes the historic docks and other key sites and areas that have either been regenerated in recent times, or are in the process of regeneration such as Gloucester Quays, the Kings Quarter area, Greyfriars and Blackfriars.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA15: King's Quarter</b>
<b>Site description and overview:</b> <b>This central site is a priority regeneration site for Gloucester City Council. It has excellent access to services, facilities and employment. In terms of public transport the City's new bus station is being built within the site and Gloucester railway station is located at very close proximity opposite the site. Located within the Regeneration Area and Housing Zone.</b>
<b>Gross site area: 2.2 ha.</b>
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Important that the vitality and viability of the primary shopping area is protected and not undermined by developments in out of centre locations.</li> <li>• Need to provide meaningful links between the existing redevelopment sites in this area.</li> <li>• Kings square should be a park with surrounding cafes and restaurants.</li> <li>• Need for quality housing close to the centre and to encourage city centre living.</li> <li>• Fill empty shops in the city centre before any extra retail facilities are provided in King's Square.</li> <li>• Provide for a multi-service development on that site, including an incorporated new facility that delivers traditional and modern library and information services alongside other information and cultural links.</li> <li>• Need for a new bus station and individual shops rather than chains.</li> <li>• Use Woolwich Square in London as a successful design example; it's always busy and used by all ages.</li> <li>• Enforce traffic free areas.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Mixed town centre uses.</li> <li>• As per July 2016 Master plan options: 5,000 – 10,000 sq. m gross retail (including small-scale convenience retail and ancillary A3, A4 and A4 uses), a new market hall, residential dwellings and student accommodation.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Listed buildings.</li> <li>• Area of Archaeological Interest.</li> <li>• City Centre Conservation Area.</li> <li>• Flood risk.</li> <li>• Below ground Scheduled Ancient Monument.</li> </ul>

<p><b>Sustainability Appraisal findings:</b></p> <ul style="list-style-type: none"> <li>• Minor negative SA scores for flood risk, the historic environment and public open space. Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.</li> </ul>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• At least 50 dwellings.</li> <li>• 5,000 - 10,000 sq. m gross retail.</li> <li>• New indoor market hall.</li> <li>• Enhanced pedestrian and cycle linkages from city centre to railway and bus station.</li> <li>• Improved public realm and open space.</li> <li>• A careful and sympathetic understanding and interpretation of the historic environment including Whitefriars Priory.</li> </ul>
<p><b>SA16: Greater Blackfriars (Incorporating: Quayside &amp; Barbican, Gloucester Prison, Ladybellgate Street Car Park, Longsmith Street Car Park and The Fleece).</b></p>
<p><b>Site description and overview:</b></p> <p>This complex brownfield site lies in the south west quadrant of the city centre. It has long been in need of regeneration. The successful redevelopment of this site would have major positive effects on the vitality and viability of the city centre and linkages between the centre, the historic docks and the River Severn. The County Council and City Council are working in partnership on this important area to progress a Master plan by way of a Local Development Order (LDO). The adoption of the LDO will enable a simplified planning regime for specified development. The LDO will effectively grant planning permission for specified types of development set out in the Order and accompanying Design Guide. Site located within the Regeneration Area and Housing Zone.</p>
<p><b>Gross site area:</b> 4.8 ha.</p>
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• Uses within the Greater Blackfriars redevelopment should complement and not compete with the Primary Shopping Area (PSA).</li> <li>• A key objective could be to bring existing heritage assets into active use within a specified time frame, to act as an anchor for the Quarter and a focus for the development of a creative/cultural hub.</li> <li>• The Ministry of Justice (MoJ) support Gloucester City Council in its wider regeneration aims for the Greater Blackfriars area and it is recognised that the prison is an important component part of the regeneration. The former prison should be identified as a self-contained development site and should be identified as a predominantly residential led development.</li> <li>• Flooding is a major concern especially the north west part of the Greater Blackfriars area.</li> </ul>
<p><b>Proposed allocation:</b></p> <ul style="list-style-type: none"> <li>• Residential-led development, student accommodation and retail and ancillary town centre uses. At least 400 dwellings.</li> </ul>
<p><b>Constraints:</b></p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• Scheduled Monuments</li> <li>• Listed Buildings</li> <li>• Conservation Areas</li> <li>• Areas of Principal Archaeological Interest.</li> </ul>
<p><b>Sustainability Appraisal findings:</b></p> <ul style="list-style-type: none"> <li>• Minor negative SA scores for sustainable transport &amp; traffic, flood risk, the historic environment and pollution and amenity. Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.</li> </ul>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• At least 400 dwellings.</li> <li>• 4,000 sq. m gross retail.</li> </ul>

<ul style="list-style-type: none"> <li>• Active ground floor frontages.</li> <li>• Student accommodation.</li> <li>• Multi storey car park to replace parking lost elsewhere on site.</li> <li>• Enhanced pedestrian connectivity between the City Centre, the Docks and Alney Island.</li> <li>• New public open space/square to enhance setting of Blackfriars Priory.</li> <li>• Active interpretation and public access to Gloucester Castle.</li> <li>• Contributions to strategic infrastructure delivery.</li> </ul>
<b>SA17: Southgate Moorings off Commercial Street</b>
<b>Site description and overview:</b> The site is located to the south west of Victoria Basin and is currently used as a pay and display car park for Gloucester Docks and the City Centre.
<b>Gross site area: 0.5 ha.</b>
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• The site is currently being used as a car park, it needs to be separated from Site WN6 and handled as a single development opportunity.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Mixed-use redevelopment.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Flood risk.</li> <li>• Docks Conservation Area.</li> <li>• Adjacent to Listed Buildings.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Minor negative SA scores for sustainable transport, the historic environment and education. Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• At least 40 dwelling units.</li> <li>• Potential for HQ office building.</li> <li>• Active ground floor frontage to Southgate Street.</li> </ul>
<b>SA18: 104, Northgate Street</b>
<b>Site description and overview:</b> A small vacant/derelict site located in Gloucester City Centre. The site had a previous planning permission for residential development and is located within the Regeneration Area and Housing Zone .
<b>Gross site area: 0.06 ha.</b>
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Has the potential (along with other city centre sites) to be a significant trip generator.</li> <li>• Performs well in terms of the SA, but some doubts over deliverability.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential with commercial uses on the ground floor. 20 dwellings and 50 sq. m for commercial uses.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• In a Conservation Area.</li> <li>• In proximity to Listed Buildings.</li> <li>• In proximity to Area of Principal Archaeological Interest.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• No negative SA scores given.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 20 dwelling units.</li> <li>• Commercial activity at ground floor.</li> <li>• Integration required with Kings Quarter redevelopment opportunities.</li> </ul>

**Westgate Ward (North)**

- 4.34 The northern part of Westgate Ward includes the City Centre, Alney Island Nature reserve and St Oswald's Retail Park. A large proportion of the eastern part of this area is in Flood Zone 3.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA19: Land adjacent to Eastgate Shopping Centre</b>
<b>Site description and overview:</b> The site is located in Gloucester City Centre adjacent to a Scheduled Monument and a new residential development. On site is an existing market hall and former bowling green. Site located in the Regeneration and Housing Zone.
<b>Gross site area:</b> 0.32 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• None – not included within the consultation.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Up to 5,000 sq. m gross retail, with other main town centre uses.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Adjacent to Scheduled Monument.</li> <li>• Within City Centre Conservation Area.</li> <li>• Potential archaeological constraints requiring further consideration.</li> <li>• Vehicular access to site is a constraint - pedestrian only?</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Potential minor negative impact on the historic environment.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 5,000 sq. m. gross retail and/or residential development contributing to city centre viability and enhanced public surveillance.</li> </ul>
<b>SA20: Land at St Oswalds</b>
<b>Site description and overview:</b> This is a vacant site surrounded by retail development. Residential development is under construction adjacent to the site. Housing development could be a continuation of these developments. The site is located in the Regeneration Area and Housing Zone.
<b>Gross site area:</b> 2.5 ha.
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• None – not included within the consultation.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Residential development, 60 dwellings.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Flood risk.</li> <li>• Possible contamination from previous uses.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Major negative SA scores for flood risk. Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• 60 dwellings to include affordable units.</li> <li>• Contributions to open space.</li> <li>• Equipped Children's play area.</li> <li>• Contribution to formal sport.</li> </ul>
<b>SA21: Former Town Ham Allotments off Westend Parade</b>
<b>Site description and overview:</b> The site is located to the north west periphery of the City, directly adjacent to existing Travelling Showpeople sites at Pool Meadow and Fairview. The site is owned by the City Council, is well located in terms of access to the road network and fairly close to the City Centre. Given the proximity to the existing Travelling Showpeople community and in the



light of the need identified in the most recent assessment, this site could form a useful extension/addition to existing sites.
<b>Gross site area: 1.1 ha.</b>
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• None – not included within the consultation.</li> </ul>
<b>Proposed allocation:</b> <ul style="list-style-type: none"> <li>• Depending on the outcome of assessment work, a site for Travelling Showpeople – either residential use, open storage use, or a mixture of both.</li> </ul>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• Poor access.</li> <li>• Land contamination and instability.</li> <li>• The presence of a high pressure gas pipe.</li> <li>• Flood risk.</li> <li>• Presence of mature trees and potentially ecologically sensitive areas.</li> </ul>
<b>Sustainability Appraisal findings:</b> <ul style="list-style-type: none"> <li>• Yet to be tested.</li> </ul>
<b>Site specific requirements:</b> <ul style="list-style-type: none"> <li>• If the site is found to be deliverable for a residential purpose, an element of affordable accommodation may be required.</li> </ul>

### **Westgate Ward (South including Hempsted)**

- 4.35** Hempsted has a long history. As a village it was originally part of Stroud District, but was absorbed into Gloucester City in 1967. It now forms part of the wider built up area of the city. Hempsted landfill site is located to the east of the ward and this area is also prone to significant flooding. Hempsted is an attractive village. Recently developed areas around Monk Meadow are almost entirely residential, but there are new areas of employment along the South West Bypass and a new large Sainsbury's was built in 2009 backing onto the canal.

Note potential boundary changes, but see also: [2013 Ward Profile](#)

<b>SA22: Secunda Way Industrial Estate</b>
<b>Site description and overview:</b> This is a relatively small and narrow site forming vacant land located adjacent to existing employment units. Located off the Hempsted Bypass (Secunda Way) opposite the new housing development at Quayside Way. The site is surrounded by residential, public open space and employment uses. The development of this site for employment uses would form a natural extension to adjacent employment uses, although it is considered B2 Use Class would not be appropriate given the proximity to existing residential properties.
<b>Gross site area: 0.7 ha.</b>
<b>Summary of responses to previous consultation:</b> <ul style="list-style-type: none"> <li>• Development here would be the worst sort of linear development.</li> <li>• Development would block the view of the green space west of the bypass.</li> <li>• This site is supported.</li> <li>• Development of this and other nearby sites would be damaging to the rural character of Hempsted.</li> <li>• Further development would not be sustainable.</li> <li>• Current infrastructure cannot sustain growth.</li> </ul>
<b>Proposed allocation:</b> <b>Employment use.</b>
<b>Constraints:</b> <ul style="list-style-type: none"> <li>• No obvious constraints.</li> </ul>

<p><b>Sustainability Appraisal findings:</b></p> <ul style="list-style-type: none"> <li>• Minor negative SA scores for soil quality and townscape/landscape. Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.</li> </ul>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• Avoid B2 Use.</li> </ul>
<p><b>SA23: Land at Rea Lane, Hempsted</b></p>
<p><b>Site description and overview:</b></p> <p>A greenfield site to the south of Chartwell Close, on the south western edge of Hempsted village. The land is agricultural improved grassland bounded by species poor hedge of high to medium landscape sensitivity. The land is adjacent to existing residential properties and would make a small but important contribution to Gloucester's housing supply.</p>
<p><b>Site area:</b></p> <p>The gross site area is 1.5 ha.</p>
<p><b>Summary of responses to previous consultation:</b></p> <ul style="list-style-type: none"> <li>• Unsuitable development site due to access on Rea Lane.</li> <li>• Lack of infrastructure for education and drainage constraints apply.</li> <li>• These greenfield areas should be protected from development.</li> <li>• Pleasant character of Hempsted would be destroyed.</li> <li>• Inappropriate in terms of impact on Landscape Character Area.</li> <li>• Adverse impact on character of the old village.</li> <li>• Limited access with narrow roads.</li> <li>• Already access problems for emergency vehicles.</li> <li>• Local school too small to cope with more numbers as a result of development.</li> <li>• Instability of land resulting from development of Chartwell close.</li> <li>• The Sustainability Appraisal fails to properly assess the Hempsted sites.</li> </ul>
<p><b>Proposed allocation:</b></p> <p>Residential development of around 35 dwellings.</p>
<p><b>Constraints:</b></p> <ul style="list-style-type: none"> <li>• Adjacent strategic Green Infrastructure (Severn and its wash lands).</li> <li>• Potential impact on Hempsted Conservation Area.</li> <li>• Topography of site constrains development.</li> <li>• Potential archaeological implications.</li> <li>• Site is adjacent to Cordon Sanitaire.</li> <li>• Access into the site is a constraint and off site highway works may be required to bring the site forward.</li> </ul>
<p><b>Sustainability Appraisal findings:</b></p> <ul style="list-style-type: none"> <li>• Minor negative SA scores for soil quality, townscape/landscape, city centre &amp; local centres and health. Potential sustainability issues in relation to these areas, but with the possibility of mitigation and/or negotiation.</li> </ul>
<p><b>Site specific requirements:</b></p> <ul style="list-style-type: none"> <li>• Around 35 dwellings.</li> <li>• Enhanced vehicular access to the site.</li> <li>• Large children's play area.</li> </ul>

## 5.0 Delivery, Monitoring and Review

### Introduction

- 5.1 The delivery of the City Plan policies and site allocations are crucial to the success of the City Plan. This will involve its use in day to day development management, the management of major regeneration initiatives in the city and the need for extensive partnership working.
- 5.2 The delivery of the City Plan will at all times be intrinsically linked to the delivery of the JCS. The policies and proposals of the City Plan should always be read alongside those of the JCS. The two plans will be delivered in parallel, and any review of these two separately produced plans is likely to be undertaken as one in the future.

### Development Management

- 5.3 The core purpose of the City Plan is to provide an up to date suite of planning policies, which are compliant with national planning policy and planning guidance in the NPPF and NPPG, against which planning applications submitted to the council can be assessed. These policies should be used alongside the strategic planning policies within the JCS.

### Regeneration Initiatives

- 5.4 There are also a number of major regeneration initiatives, especially in the city centre that the council is working on with our development partners. This includes the Housing Zone projects in conjunction with the HCA (including Blackfriars), and other joint projects and private sector led projects such as at the Kings Quarter.
- 5.5 The policies of the City Plan (and JCS) will be used as guidance for the pre-application discussions, and the City Plan allocations as policy guidance for the types of development that would be supported on these regeneration sites.

### Partnership Working

- 5.6 We will continue to work with our neighbouring authority partners, both the JCS partners and other authorities including Stroud, all under our Duty to Cooperate.
- 5.7 The delivery of the City Plan will be linked to the need for partnership working, especially on those development and infrastructure proposals that are located on the periphery of the city.
- 5.8 This will include working with Tewkesbury on the implementation of the JCS strategic allocations to the north and east of the city at Innsworth, Twigworth, South Churchdown and Brockworth.
- 5.9 This will also include working with Stroud on the issues arising from the planned growth to the south of the city, including the major new growth area at Hunts Grove in Stroud district.
- 5.10 This will also involve the need for good collaboration and partnership working with the private sector.

### Transport and Infrastructure Delivery

- 5.11 Fundamental to the delivery of the City Plan will be the ongoing relationship with Gloucestershire County Council. In particular there will need to be ongoing dialogue with regard to the delivery of the various transport projects contained within the Local Transport Plan, and also ongoing dialogue on issues such as education provision in the city.

- 5.12 Other issues such as the ongoing discussions regarding flood protection infrastructure with the Environment Agency will also be important. The Infrastructure Delivery Plan and consequent updates will be a useful guide in this regard.

**Funding - Section 106, Community Infrastructure Levy and Other Sources**

- 5.13 We must work together with the County Council and other delivery agencies to find innovative ways of funding the necessary infrastructure to support the planned growth and changing infrastructure needs of residents.
- 5.14 Infrastructure that is closely related to each development proposal will be accommodated on site, and continue to be negotiated via s106 agreements. This will continue to include the provision of policy compliant levels of affordable housing, subject to site specific viability issues.
- 5.15 The s106 approach needs to work alongside the new Community Infrastructure Levy which is being implemented for the purposes of funding our strategic infrastructure requirements. Close partnership working with all other Gloucestershire local authorities will be required for the collection and spending of CIL monies.
- 5.16 In addition to s106 and CIL, other sources of funding will be required to be sourced for the delivery of essential infrastructure, including direct funding of infrastructure from central Government and other national / regional organisations.

**Monitoring of the City Plan**

- 5.17 Annual monitoring of housing and employment delivery against land supply and targets for delivery will continue as per previous years. This includes the calculation of the 5 year housing land supply position.
- 5.18 Housing delivery will be monitored against the housing targets and trajectory set out in the JCS and any future updates of the housing trajectory. Performance will always be measured against the housing need set out in the JCS.
- 5.19 Output indicators have been included in the Monitoring Framework of the JCS to highlight progress in funding and delivering essential projects such as road improvement schemes and open space provision. The JCS output indicators are considered sufficient for the area and therefore it is not considered necessary to have a second set of indicators for the City Plan. The JCS provides comprehensive guidance for indicators in this regard.
- 5.20 The primary and secondary employment allocations will be monitored for gains and losses of both employment land supply and floorspace provision.
- 5.21 In time the annual monitoring of housing and employment is likely to be carried out in conjunction with our JCS partners.

**Review of the City Plan**

- 5.22 The NPPF sets out that plans should be flexible to adapt to changing circumstances. The Council is therefore committed to reviewing the City Plan at an appropriate time if significant delivery issues emerge through its annual monitoring and / or if policy compatibility issues emerge.
- 5.23 Monitoring the performance of the City Plan is essential to assess its effectiveness, to record whether proposals and allocations are being delivered, and whether policies are being implemented and remain effective. The outputs of the annual housing and employment monitoring will enable us to be fully informed of progress on the ground, and ultimately whether a partial or full review of the City Plan is necessary.

- 5.24 The City Plan has been written with the intention of it remaining a robust policy document for Gloucester city for the foreseeable future. It is not expected that a review of its policies in particular would be required before 10 years following its adoption.
- 5.25 However the supply of land for housing, employment and other uses is an area that requires constant monitoring. Whilst the strategic approach adopted for this City Plan is to maximise the capacity of developable land within the city boundary, further land may be required for the needs of Gloucester in the future. This is likely to require land from outside of the city boundary, and in this regard the review of the JCS is relevant.
- 5.26 The JCS sets out a specific approach to an early review. The early review approach uses percentage indicators for the delivery of housing including the use of a 10% buffer on housing delivery for each authority on an annual basis and a 75% trigger mechanism for strategic allocations should delivery of these fall below the expected rates of delivery over any three consecutive years.
- 5.27 The JCS is also expected to be reviewed in conjunction with other Gloucestershire authorities, including Stroud district. This is consistent with the Gloucestershire approach to Devolution.
- 5.28 An immediate single issue review of JCS retail policy is also required following its adoption in 2017. This may have an impact on sites identified for retail purposes within the city.
- 5.29 The need for a review of the City Plan will therefore be an ongoing consideration in the context of any JCS review that may take place, and / or any significant changes to the national planning policy context. Therefore no specific time frame for the review of the City Plan is required at this time.

## Appendices

### Glossary

***Disclaimer – The Glossary is neither a statement of law nor an interpretation of the law. Its status is only an introductory and should not be used as a source for statutory definitions.***

**Accessibility** - The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.

**Affordable Housing** - Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

**Air Quality Management Areas** - Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

**Allotment** – A plot of land rented by an individual or community for the purposes of growing food and/or flowers.

**Amenity** - A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

**Amenity Space** - Open land, often landscaped, that makes a positive contribution to the appearance of an area or improves the quality of the lives of people living or working within the locality.

**Ancillary Use** - A subsidiary or secondary use or operation closely associated with the main use of a building or piece of land.

**Archaeological Assessment** - An assessment of the potential archaeological interest of a site or building. This can be either a desk-based assessment or a field assessment, involving ground survey and small-scale pits or trial trenching carried out by professionally qualified archaeologist(s) looking for historical remains.

**Areas of Outstanding Natural Beauty** - An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Together with National Parks, AONB represent the nation's finest landscapes. AONB are designated by the Natural England.

**Back-land Development** - Development of 'landlocked' sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.

**Biodiversity** - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Biodiversity Action Plan** - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Brownfield Land and Sites** - Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. Also see 'Previously-Developed Land'.

**Bulky Goods** - Goods of a large physical nature (for example DIY, furniture, carpets) that sometimes require large areas for storage or display.

**City Centre** - The highest order centre, often a regional or sub-regional retailing and service centre, serving a wide catchment.

**City Plan** – The Development Plan for the City of Gloucester

**Climate Change** - Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.

**Climate Change Adaption** - Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

**Climate Change Mitigation** - Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

**Commitments** - All land with current planning permission or allocated in adopted development plans for development (particularly residential development).

**Community Facility** – A place where the community can meet and come together to hold meetings and events.

**Community Infrastructure Levy** - A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.

**Conservation** - The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Conservation Area** - Local authorities have the power to designate as conservation areas, any area of special architectural or historic interest. This means the planning authority has extra powers to control works and demolition of buildings to protect or improve the character or appearance of the area. Conservation Area Consent has been replaced by planning permission for relevant demolition in a conservation area.

**Convenience Goods** – Everyday essential items, such as food.

**Convenience Shopping** – The provision of everyday essential items, such as food.

**Conversions** - Generally means the physical work necessary to change the use of a building from a particular use, classified in the use classes order, to another use. Can also mean the sub-division of residential properties into self-contained flats or maisonettes.

**Culture** - Culture includes arts, media, sports, libraries, museums, parks, and the countryside, built heritage, tourism, and the creative industries.

**Curtilage** - The area normally within the boundaries of a property surrounding the main building and used in connection with it.

**Decentralised Energy** - Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.

**Density** - In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

**Development Management** - The process whereby a local planning authority receives and considers the merits of a planning application and whether it should be given permission having regard to the development plan and all other material considerations.

**Development Plan** - A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

**District Centres** - A group of shops and some service outlets serving part of an urban area and providing a geographic focus for it, separate from the town centre but with more variety than local centres.

**Dwelling and Dwelling House** - A self-contained building or part of a building used as a residential accommodation, and usually housing a single household. A dwelling may be a house, bungalow, flat, maisonette or converted farm building.

**Economic Development** - Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

**Edge of Centre** - For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Elevation** - The actual facade (or face) of a building, or a plan showing the drawing of a facade.

**Evidence Base** - The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

**Flood Plain** - Generally low-lying areas adjacent to a watercourse, tidal lengths of a river or the sea, where water flows in times of flood or would flow but for the presence of flood defences.

**Flood Risk Assessment** - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

**Fossil Fuel** - Carbon-rich fuel (coal, oil and natural gas) formed from the remains of ancient animals and plants. Their combustion is considered to contribute to the 'greenhouse effect'.

**Geodiversity** - The range of rocks, minerals, fossils, soils and landforms.

**Greenbelt (not to be confused with the term 'greenfield')** - A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purposes of the green belt is to: check the unrestricted sprawl of large built up areas, prevent neighbouring towns from merging, safeguard the countryside from encroachment, preserve the setting and special character of historic towns, assist urban regeneration by encouraging the recycling of derelict and other urban land. There is no designated Green Belt land within the Gloucester City Boundary. The Green Belt outside of the City is defined within the Joint Core Strategy.

**Greenfield Land or Sites** - Land (or a defined site) usually farmland, that has not previously been developed.

**Greenhouse Effect/ Global Warming** - The gradual heating of the Earth due to greenhouse gases, leading to climate change and rising sea levels. Renewable energy, energy efficient buildings and sustainable travel are examples of ways to help avert the greenhouse effect.



**Green Infrastructure** - A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**Groundwater** - An important part of the natural water cycle present underground, within strata known as aquifers.

**Heritage Asset** - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Highway** – A publicly maintained road, together with footways and verges.

**Highways Agency** - An executive agency of the Department for Transport. The Highways Agency is responsible for operating, maintaining and improving the strategic road network of England.

**Historic Environment** - All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Historic Environment Record (HER)** - Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

**Housing Associations** - A common term for independent, not-for-profit organisations that work with councils to offer flats and houses to local people.

**Independent Retailer** - A non-multiple retailer operating separately and outside of a larger company chain.

**Infill development** - The development of a relatively small gap between existing buildings.

**Infrastructure** - Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.

**Joint Core Strategy** – The local core strategy ‘Development Plan’ document for the administrative areas of Gloucester City, Cheltenham Borough and Tewkesbury Borough councils.

**Layout** - The way buildings, routes and open spaces are placed or laid out on the ground in relation to each other.

**Legibility (in terms of settlement patterns)** - A legible area is one with a strong sense of local identity. Locations, streets, open spaces and places that have a clear image and are easy to understand. For example, a location that is easy to find your way around.

**Listed Building** - A building of special architectural or historic interest. Listed buildings are graded I, II\* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. wells within its curtilage).

**Listed Building Consent** - Consent required for the demolition, in whole or in part of a listed building, or for any works of alteration or extension that would affect the character of the building.

**Local Centre** - A small group of shops and perhaps limited service outlets of a local nature (for example, a suburban housing estate) serving a small catchment. Sometimes also referred to as a local neighbourhood centre.

**Local Development Plan** – see ‘Development Plan’

**Local Enterprise Partnership (LEP)** - A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

**Local Planning Authority** - The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the district council, London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.

**Main Town Centre Uses** - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Master Plan** - A type of planning brief outlining the preferred usage of land and the overall approach to the layout of a developer. To provide detailed guidance for subsequent planning applications.

**Material Consideration** - A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

**Minerals Local Plan** - A statutory development plan prepared by a minerals planning authority (Gloucestershire County Council) under transitional arrangements, setting out policies for the control of development constituting of the winning and working of minerals or the deposit of mineral waste.

**Mixed Use (or mixed use development)** - Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

**Multi-Use Games Area (MUGA)** - An enclosed area, using a synthetic grass or hard surface for playing sports, for example five-a-side soccer or netball.

**Nature Improvement Area** - The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.

**Neighbourhood Development Plan** - A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

**National Planning Policy Framework** – The Government's planning policies for England and how these are expected to be applied.

**Older People** - People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

**Open Space** - All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

**Original Building** - A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

**Out-of-Centre** – A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Out-of-Town** - A location out of centre that is outside the existing urban area.

**Over-development** - An amount of development (for example, the quantity of buildings or intensity of use) that is excessive in terms of demands on infrastructure and services, or impact on local amenity and character.

**Overbearing** - A term used to describe the impact of a development or building on its surroundings, particularly a neighbouring property, in terms of its scale, massing and general dominating effect.

**Overlooking** - A term used to describe the effect when a development or building affords an outlook over adjoining land or property, often causing loss of privacy.

**Overshadowing** - The effect of a development or building on the amount of natural light presently enjoyed by a neighbouring property, resulting in a shadow being cast over that neighbouring property.

**Planning Brief** - A planning brief can include site-specific development briefs, design briefs, development frameworks and master plans that seek to positively shape future development.

**Planning Condition** - A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

**Planning Field** - The whole of a site which encompasses at least one playing pitch as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Pollution** - Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

**Previously Developed Land** - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Primary and secondary frontages** - Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

**Primary Shopping Area** - Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

**Private Open Space** - Open space that is usually privately owned and is not usually accessible by members of the public.

**Protected Species** - Plants and animal species afforded protection under certain Acts and Regulations.

**Public Art** - Permanent or temporary physical works of art visible to the general public, whether part of a building or free-standing. For example, sculpture, lighting effects, street furniture, paving, railings and signs.

**Public Open Space (POS)** - Urban space, designated by a council, where public access may or may not be formally established, but which fulfils or can fulfil a recreational or non-recreational role (for example, amenity, ecological, educational, social or cultural usages).

**Public Realm** - Those parts of a village, town or city (whether publicly or privately owned) available, for everyone to use. This includes streets, squares and parks.

**Regeneration** - The economic, social and environmental renewal and improvement of the City.

**Renewable and Low Carbon Energy** - Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

**Retail Floorspace** - Total floor area of the property that is associated with all retail uses. Usually measured in square metres. May be expressed as a net figure (the sales area) or in gross (including storage, preparation and staff areas).

**Retail Impact** - The potential effects of proposed retail development upon existing shops.

**Retail Impact Assessment** - An assessment undertaken for an application for retail use (normally on developments over 2,500 square metres gross floorspace, but they may occasionally be necessary for smaller developments, such as those likely to have a significant impact on smaller centres) on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

**Site of Special Scientific Interest (SSSI)** - A site designated by Natural England under the Wildlife and Countryside Act 1981 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (plants, animals and natural features relating to the Earth's structure).

**Supplementary Planning Documents (SPD)** - Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Supplementary Planning Guidance (SPG)** - may cover a range of issues, both thematic and site specific and provide further detail of policies and proposals in a development plan.

**Sustainability Appraisal (SA)** - An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

**Sustainable Transport Modes** - Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

**Transport Assessment** – A comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences.

**Travel Plan** - A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

**Tree Preservation Order** - A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a tree preservation order may not normally be topped, lopped or felled without the consent of the local planning authority.

**Urban Design** - The art of making places. It involves the design of buildings, groups of buildings, spaces and landscapes, in villages, towns and cities, to create successful development.

Urban Regeneration - Making an urban area develop or grow strong again through means such as job creation and environmental renewal.

Veteran Tree - A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.

Ward - A small sub-area of a local authority district.

Windfall Site - Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

## **Acronyms**

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Areas
BAP	Biodiversity Action Plan
JCS	Joint Core Strategy
HER	Historic Environment Record
HRA	Habitat Regulations Assessment
LDS	Local Development Scheme
LEAP	Locally Equipped Area of Play
LEP	Local Enterprise Partnership
MUGA	Multi Use Games Area
NPPF	National Planning Policy Framework
POS	Public Open Space
PPG	Planning Practice Guidance
PSA	Primary Shopping Area
SA	Sustainability Appraisal
SALA	Strategic Assessment of Land Availability
SCI	Statement of Community Involvement
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order

**This page is intentionally left blank**

Appendix 2 – Response Report

Please note: Respondent's comments have been added verbatim

Comment Received to Question 1: Do you agree with the general strategy identified for dealing the key challenges? If no....	Key points and Officer Response
<p>Generally yes, but whilst there is a general recognition that the City will need to accommodate growth on its periphery the references to that growth being best directed to the north of the city ignore the fact that the city will continue to grow south of the city with the build out of the already consented Hunts Grove development. In the proposed Stroud Local Plan an extension of this area is proposed to accommodate between 500-750 houses and associated infrastructure, services and community facilities. The relationship of Gloucester with Stroud is not addressed in the City plan. It is a fact that Gloucester's influence stretches beyond its city boundaries, attracting workers, shoppers, students and visitors from Stroud district. The Hunts Grove proposals present the opportunity to effectively complete this development and improve the infrastructure and service provision to the south of the city within a planned urban extension at a well contained and sustainable location as supported by the Council's evidence base. The City Council should co-operate with Stroud District continuing to work together to resist major expansion south of the city in less sustainable locations. Acknowledgement of this limited southward growth in the City plan would help address the relationship between the two LA areas and their populations.</p>	<p>Noted. These are important issues and Gloucester city will continue its duty to cooperate with Stroud with regard to cross boundary growth issues. The City Plan does need to be read alongside the JCS in this regard as the JCS in particular addresses these cross boundary and south of Gloucester issues. The City Plan will also address this issue more fully as it progresses.</p>
<p>We strongly support the Council's strategy 'Going for growth' which is a City First approach to development and identifies Kings Quarter as the City's priority regeneration site for delivering a step change in its retail and an improved City Centre environment.</p>	<p>Noted.</p>
<p>In general terms Royal Mail supports Gloucester City Council's strategy for dealing with the identified challenges and the intention of "going for growth", subject to the following comments:                      The "city centre first" approach should not be so rigorously applied through the emerging policy framework such that it has a detrimental effect on the wider City council area. In promoting sites for development there may be instances where the occupational demand (for example from retailers) is not in the city centre, in which case the city could lose valuable investment unless it applies the city centre first principle in a flexible manner.                      The fifth paragraph of the strategy section addresses opportunities for expansion of the built area of Gloucester to meet identified need for housing. It is noted that sites within the administrative area of Gloucester will be allocated for housing. Royal Mail considers that the emphasis here should be on maximising the use of brown field land within the existing urban area before considering the release of green field land. This is reflected in the wording of Key Development Principle 1, but requires greater emphasis in the fifth paragraph.</p>	<p>Noted.                       It is important that the city centre first principle for retail development continues to be applied in order to protect the city centre from unacceptable vacancy and underinvestment issues. However this should be done without stifling leisure and commercial investment that could reasonably take place outside of the city centre that would not harm the vitality and viability of the city centre and its retail offer in particular.</p>
<p>The general strategy of "Going for Growth" is supported and therefore embracing the growing population and opportunities it offers for the City is positive. The Strategy recognises the key role the City should have within the County as a principle focus for jobs, new homes and development and this is supported. It also recognises a significant number of constraints which exist within the urban area of the City and within the administrative area of Gloucester. The Plan suggests that this will be required. Whilst this may be the case, then the appropriateness of such development will be enhanced if the City has also worked closely with developers in a positive manner to bring forward opportunities for housing development within the City in the first instance and as a priority.                      Directing more development to the north of the City is also supported, given its general proximity to the City centre and available service infrastructure.</p>	<p>Noted.                       The policies of the City Plan are intended to provide flexibility that allows for development to proceed where possible.                       An Infrastructure Delivery Topic paper for Gloucester will be prepared as part</p>

	of the City Plan evidence base.
Within the County of Gloucestershire, CPRE supports the intention that Gloucester should be the main focus for new jobs, houses and development; and that a first priority should be to maintain the momentum to regenerate the City Centre, with a City Centre first approach to development. We endorse the aspiration that "the City's retail offer, economic base, cultural facilities, quality of connections, visitor management and public realm will all be improved."	Noted.
Related to my comments under the heading 'Gloucester's Challenges' on environmental assets, the wording of the second paragraph before the "Key Development Principles to Deliver the Strategy" box should be amended to read: 'Development pressure within the City also needs to be balanced with the protection of the City's environmental assets including its natural environment, wildlife and built heritage. Areas of open space and allotment provision will be improved to encourage healthier communities and protect biodiversity. The plans proposals map will identify areas for protection of the natural environment including sensitive landscapes. This will include areas around Robinswood Hill, the River Severn flood plain and Alney Island.....'	Noted.  The natural environment of Gloucester and its important open spaces are of vital importance to the city and those that are considered worthy of protected status are (or will be) protected in the final City Plan and its supporting proposals and allocations map.  Additional sporting and recreation facilities will be supported in principle at appropriate locations in the city.
The emerging JCS and accompanying Evidence Base are clear in identifying the need for Green Belt review and the delivery of new housing to the north of the City. However, this general strategy should not preclude smaller scale growth around the urban edge of Gloucester at appropriate sustainable locations, including Land East of Winnycroft Lane. A number of future City Plan preparation stages are to be undertaken (as identified by the 'Next Steps' stages of the Part 1 Consultation Document). Whilst a significant Evidence Base has informed the production of the JCS, to date, it is considered that the above wording could be read as eliminating any development opportunities to the east, south or west of the City, despite the potential capacity of these sites or the wider benefits that could be secured through growth at such locations. Accordingly it is considered that the above wording be amended to read: '...to meet all Gloucester's growth need, as set out in the Joint Core Strategy, additional land on the periphery of the City's boundary is required... to achieve this future growth, and as identified in the Joint Core Strategy, growth is best directed to the north of the City rebalancing the urban area which has over the years become artificially distorted with growth southwards along the A38. In addition, extensions to the urban area at other locations around the City will be considered where sustainable development can be delivered at a scale appropriate to its location.' Under the 'Gloucester's Challenges' section of the Part 1 Consultation Document, bullet point number 7 identifies that growth needs to assist in regenerating more deprived areas of the City. Paragraph 5 of the 'general strategy' identifies that 'integrated growth is the key to ensuring growth benefits the City'. In line with this principle Paragraph 8 identifies that 'regeneration opportunities within more deprived areas of the City will be progressed where resources permit'. We consider there is opportunity to create a stronger link between the delivery of the new homes and the regeneration of deprived areas of the City. For example, new residential development situated within the identified wards, provides the opportunity for the Council to secure wider community benefits as a result of new development.	The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of development.  Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector). The capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.
National Planning Policy Framework. Since drafting this document, the National Planning Framework has been published. It will, therefore, be incumbent on you to ensure that this local plan will meet the criteria as laid out in the NPPF. Whilst the City Plan has enormous potential to revitalise the city, it must clearly demonstrate that the degree of change envisaged will be managed to avoid significant adverse impact on the city's archaeological and historic integrity. A key feature of any Area Action Plan should be to protect areas particularly sensitive to change. The historic environment offers important clues to achieving a sense of place, something much harder to do with a cleared site, and should be seen as an asset and not a liability. This applies to large group elements, whether it be specific buildings or down to small elements such as the detail of the public realm. The Plan should identify the significance and value of these assets and ensure that new development presents a positive view of contemporary urban design in the historic setting of Gloucester. In accordance with NPPF paragraph 126, the City Plan should 'set out a positive strategy for the conservation and enjoyment of the historic environment'	Noted.  The historic environment of Gloucester is very important and respecting this in the design of new buildings whilst introducing exciting new styles is also important.



<p>(whether direct, indirect, cumulative, long-term or short-term). In doing so, this should provide a framework for the recognition of the limits of the historic environment to accept further change without irreversible damage. Significant adverse impacts on the historic environment should be avoided and alternative options that might reduce or eliminate those impacts pursued. Presentation - The document appears to have been developed in a similar style and presentation to a Core Strategy. This may be a deliberate strategy in preparing a suite of documents within the LDF family or it may be premature to start considering this aspect of the document. However, we would strongly advocate moving away from a strategic policy approach to a more detailed format that should be designed to attract developers with clear and exciting graphics. The final document needs to be an eye catching, visually exciting document to read than a conventional DPD. Gloucester's Challenges. Managing Gateways-Consideration should be given to a separate document or appendix that provides a movements/connectivity strategy for the city that would help to link and enhance the gateways identified. The work undertaken to date by City Council, County Council and GHURC may appear to be ad-hoc but there are clear underlying principles that could be brought together in a strategy that features existing improvements and where the need for further linkage improvements around gateways could be undertaken. We still believe that one of the Key areas to concentrate on is the Cathedral Precincts. It may not be a true gateway but is one of the pivotal nodes for visitors. Historic Environment We previously commented on the 'The Vision'. We reiterate that the role of the historic environment in the regeneration of the city should not be underestimated and indeed could be the instigator for major attractions as the example of the Docks re-development has demonstrated. We repeat our previous concerns about the use of the 'built heritage' only being referred to. There is a need to consider the historic environment more holistically. One of the greatest assets of the city is in its underground wealth of archaeology. The implications of 'built environment' imply above ground heritage only. We recommend in line with the NPPF that your plan should embrace both designated and non-designated heritage assets. Sustainability Appraisal - We previously criticised the Draft Sustainability Appraisal and understand that a letter will be sent through in due course explaining the situation regarding this matter.</p>	<p>The Gloucester Public Realm Strategy will assist in this regard. It is due to be adopted in 2017.</p> <p>The City Plan will refer to all heritage assets in the widest sense of the term in accordance with the NPPF.</p>
<p>It is a concern that the strategy in the emerging City Plan addresses issues outside of Gloucester City's administrative boundary, which are matters for the Joint Core Strategy (JCS). This Plan does not need to concern itself with the location of strategic allocations within neighbouring districts; its purpose is to identify and plan for local allocations within Gloucester, not to help facilitate and promote growth to the north of the City within Tewkesbury Borough. In accordance with the City Plan's vision which places a focus on the economy and Gloucester's communities, the Plan's strategy should concentrate on delivery of growth within its administrative boundary and promote greater connectivity between the City Centre and outlier suburban communities within the City's administrative boundary. The strategy states that new communities to the south of the City Centre, along the A38 corridor, feel 'isolated and unconnected due to their significant distance from services and facilities provided in the City'. However rather than resolving this challenge, the strategy instead promotes growth elsewhere on the basis that 'perpetuating or extending this direction of growth (to the south of the City Centre) for the urban area will exacerbate this situation and would be incompatible with the principles of sustainability'. Therefore the strategy does not seek to resolve the connectivity issue to the south of the City Centre and instead proposes to deliver infrastructure to facilitate the development of greenfield sites to the north of the City. Rather than identifying this as a problem that should not be exacerbated, the City Plan should instead identify this as a challenge that needs to be resolved. These new communities are located along a key transport route leading from the M5 Motorway to the City Centre, which represents an opportunity to support a sustainable transport policy and an improved 'gateway' to the City from the south (in accordance with the first challenge identified in the emerging City Plan). Furthermore, this part of the City hosts a range of employment facilities, such as Waterwells Business Park, that benefit the wider City and it is imperative that enhanced connections between the City Centre and these areas are facilitated within the City Plan. Accordingly, it is submitted that the City Plan should prioritise improving access to infrastructure and services for the new and existing communities along the A38 corridor and improving connections between the communities and the City Centre. In addition to the above, the City Plan's strategy section states that the 'City Plan strategy is therefore adopting a City Centre first approach to development to regenerate and enhance the City Centre experience'. Crest supports the plan's attempts to regenerate the City Centre, however it should not adopt a City Centre First approach to all development as suggested in the above extract at the expense of facilitating the delivery of housing and economic growth in other parts of the City. The City needs to maximise flexibility to ensure that the demands of business and communities are met and it is submitted that 'City Centre first approach' should apply only to Town Centre uses.</p>	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also needs to account for the growth being planned for by Stroud district to the south of Gloucester, by for example, planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
<p>Yes this seems sensible, Gloucester has a good age range of people and we should be targeting poverty and getting people into work so that they can improve their lives. What seems to happen is that people improve their education and skills and move out of the city to live elsewhere. We need to encourage people to live in the city by providing high quality larger home for these qualified and skilled people. Otherwise they move to Cheltenham and the</p>	<p>Noted.</p> <p>Major regeneration in the city, as is being planned for in the City Plan,</p>

surrounding countryside.	should continue to deliver additional homes, leisure and recreational facilities for the residents of Gloucester.
We would like to see City Centre regeneration as a priority development on the periphery of the City's boundary is not relied upon as a viable alternative to developing the Centre. We are keen to retain Brockworth's heritage and not erode the history and green space of the village with further housing development at the East of Gloucester City.	Noted.  The City Plan will be taking a centre first approach as per the guidance in the National Planning Policy Framework (NPPF).  Brockworth lies outside of the administrative boundary of the City.
We fully support the Council's desire to increase the City's tourism and culture offer, and agree that the Docks are an ideal location to attempt to improve the City's retail offer via niche retailing, independent shops and markets. A balance needs to be struck in the docks which at present have a high proportion of residential use, resulting in insufficient movement and vibrancy during the day time. To achieve this any further residential usage should be above other mixed uses such as commercial / retail / food & drink / entertainment etc.	Noted.
Our client supports the City Plan's aim to embrace the City's potential to expand and improve its economy. As part of this, our client supports the identification of regenerating the City Centre as a catalyst for the wider regeneration of the City. Our client strongly supports the City Plan's strategy which adopts a city centre first approach to regenerate and enhance the City Centre experience, raise its retail ranking position and increase its attractiveness to the market. However it is considered that this 'city-centre first approach' should be more clearly referenced as part of the previous section entitled "Gloucester's Challenges". Aviva Investors also supports the identification of Kings Square as a regeneration priority and key to delivering this aim. However our client is concerned with the ambiguous reference to 'large retailers'. It is unclear what is meant by this reference - do large retailers mean multiple nationals or physically larger units? Our client therefore requires this section is amended to relate to a broader aim to provide a varied retail experience in the City Centre encompassing a range of retail units which are likely to be attractive to independent retailers as well as multi-national occupiers.	Noted.  The City Plan will define the term and set a threshold.
As a general point we totally support the 'City Centre first' approach to regeneration aiming to increase the numbers visiting the Centre by improving the range and quality of the provision.	Noted.

<b>Comment Received to Question 2: Do you agree with the key challenges identified? If no, what alternatives would you like to see...</b>	<b>Key points and Officer Response</b>
<p>We are pleased to see (on page 4?) that 'the City's retail offer, economic base, cultural facilities, quality of connections, visitor management and public realm will all be improved.' We advise that the impact of theatre on the evening economy can be significant. According to the Arts Council England's (Economic impact study of UK theatre April 2004), in addition to the theatre ticket purchase; 'Every audience member spends on average £7.77 on food, transport and childcare when they visit a UK theatre outside the West End'.</p> <p>There is now clear guidance in the new NPPF which states that one of the three dimensions to support economic development is for the support of communities' health, social and cultural well-being. It also recommends that established cultural facilities and services are retained and able to develop for the benefit of the community, and there should be policies to guard against the unnecessary loss of valued cultural and community facilities.</p> <p>The primary purpose of cultural facilities is to enlighten and entertain the public through the production, presentation, exhibition, advancement and preservation of art, music, theatre and dance. Support of culture is increasingly seen as an investment in an area's present and future quality of life and there is a growing awareness of the role that the arts and culture play in developing an educated workforce and, on the other hand, in attracting an educated workforce to a town. The infrastructure that is provided for communities' quality of life will become an increasingly important element in attracting new</p>	<p>A Cultural Strategy for Gloucester has been produced.</p> <p>Policies to encourage new cultural and leisure facilities for residents and visitors are included in the City Plan.</p>

residents	
<p>Generally yes, but under "There is a need to raise the profile, image and overall attractiveness of Gloucester including a need to improve gateways into and around the city" the gateways mentioned appear to relate mainly to the city centre and not gateways to the city as a whole. Taking entry to the wider city from the Stroud direction, the main 'gateways' to Gloucester are currently along the A38 at Hardwicke/Waterwells and the A4173 at Tuffley. The sentiments expressed in this challenge apply equally to these areas and they should equally receive attention in terms of improving their attractiveness to raise the profile and image of the city as a whole. In the proposed Hunts Grove development at Hardwicke (albeit outside the City Plan jurisdiction) there is the opportunity to provide a sense of arrival to the built up area of wider Gloucester. The City Council should work together with Stroud District Council to take advantage of this unique opportunity.</p>	<p>Noted. These are important issues and Gloucester city will continue its duty to cooperate with Stroud with regard to cross boundary growth issues. The City Plan does need to be read alongside the JCS in this regard as the JCS in particular addresses these cross boundary and south of Gloucester issues. The City Plan will also address this issue more fully as it progresses.</p>
<p>We strongly support the issues to be addressed described as Gloucester Challenges, in particular the need to protect and enhance the core shopping area and raise its retail ranking.</p>	<p>Noted.</p>
<p>Royal Mail generally agrees with the 9 key challenges identified within the Part 1 consultation document, save for the following comments:  The stated need in the first key challenge (raising the profile and attractiveness of Gloucester including the need to improve gateways into and out of the city) does not refer to the A38 Eastern Avenue / Barnwood Road area as a gateway. It should be referred to. The A38 serves as an important arterial route from the M5 via the A417 into Gloucester and its commercial areas on the eastern outskirts. Royal Mail has an interest in the promotion of this area due to its 2.25 ha landholding at Gloucester Mail Centre is a prominent site with frontage to Eastern Avenue and its roundabout junction with Barnwood Road. The second key challenge (increasing and making best use of the city's tourism and culture offer) should reference the need to additional hotel accommodation in the city which has been identified as a requirement for Gloucester in the Joint Core Strategy evidence base (Lambert Smith Hampton and Marketing Planning Associates report May 2009). In the context of the fifth key challenge (bringing forward positive opportunities for deliverable development sites), the focus here should be on brown field sites first, but there is no mention of this in current wording. Royal Mail is aware that in the next iteration of the City Plan Gloucester City Council will be putting forward suggested site allocations for development to meet housing and economic needs. In this further consultation period, Royal Mail is likely to be notifying the Council of the potential opportunity presented by the Gloucester Mail Centre site on Eastern Avenue. As the Council may be aware from Royal Mail Group's recent SHLAA response, the Mail Centre site may become available for redevelopment in next 5 years subject to appropriate re-provision being made on an alternative Mail Centre site to serve Gloucester. If the site does become available, Royal Mail considers the Mail Centre site will present a positive opportunity that may assist the Council with meeting the fifth key challenge.  The third core planning principles set out in paragraph 17 of the NPPF indicates that "plans should take account of market signals, such as land prices and housing affordability and set out a clear strategy for allocating sufficient land which is suitable for redevelopment in their area, taking account of the needs of the residential and business communities." In relation to the sixth stated key objective (supporting economic growth through delivery of sufficient employment land), the Council will no doubt be aware that there is significant amount of employment land available in Gloucester, both allocated and unallocated. The most recent study into employment land in Gloucester is the employment land review conducted by Nathaniel Lichfield Associates in March 2011 and which now forms part of the Joint Core Strategy evidence base. This report concluded that "...the total amount of employment land identified should mean that there is more than sufficient land to accommodate employment requirements in the area."  Particularly in view of this supply and demand position, Royal Mail would encourage Gloucester City Council to build in greater flexibility for employment generating non-B class uses to be developed on employment sites, in line with the "whole community" approach advocated in paragraph 7.11 of the Nathaniel Lichfield report and paragraphs 21 and 22 of the National Planning Policy Framework (NPPF) as published in March 2012.</p>	<p>Noted.  It is important that the city centre first principle for retail development continues to be applied in order to protect the city centre from unacceptable vacancy and underinvestment issues. However this should be done without stifling leisure and commercial investment that could reasonably take place outside of the city centre that would not harm the vitality and viability of the city centre and its retail offer in particular.</p>
<p>The key challenges are generally agreed and supported. There is welcomed recognition of the need to accommodate the growing population by providing a good range and mix of high quality housing. It is also welcomed that this is expressed in a positive manner highlighting exciting and positive ways in which this would benefit the city.</p>	<p>Noted.  The City Plan will aim to facilitate the</p>

<p>Recognition is also made of the significant number of development sites within the city which present positive opportunity for development although the plan does note that a number of these are constrained. The Plan should look to proactive working with landowners and developers to bring forward sites which may have become redundant from their former use, or stand vacant, particularly where these sites form part of the established urban area of the City. A flexible approach should be taken to address constraints and assist in bring such sites forward for development. Many of these sites could contribute to the overall housing target as References are made to the need to provide new affordable housing to meet the needs in the City but also recognition is given to the challenges of affordable housing delivery on previously developed sites. We would advocate a flexible approach to the delivery of affordable housing, which should embrace the full broad definition of affordable housing within the new National Planning Policy Framework, as well as recognising other wider market led initiatives to improve access to the housing market.</p>	<p>delivery of homes that meet the needs of residents.</p>
<p>CPRE agrees with the key challenges which have been identified and that all need to be addressed. The most difficult challenges, in the current economic climate, are seen as ensuring that all brownfield redevelopment opportunities are realised, that sufficient affordable housing is delivered, and that progress to regenerate the City centre is maintained. It will also be a challenge to ensure that all aspects of new development are of the highest quality with associated improvements to the streetscape and pedestrian links.</p>	<p>Noted. The strategy for the JCS and the City Plan adopts an approach of maximising urban capacity and the use of brownfield land before having to seek greenfield sites or areas located in the Green belt for development.</p>
<p>General support but concerned about statement on protecting and improving Gloucester's valuable natural environment and built heritage. It follows and appears secondary and subservient to 'meeting the pressure for growth and development needs of the City'. Furthermore the reference to protecting 'valuable' natural environment and built heritage suggests that value judgements have already been made or will be made in the future as to what is valuable. Has there been any consultation on such issues and is there likely to be? Will such judgements be made on an ad hoc basis in answer to development pressures? In addition the word 'natural' adds ambiguity to the statement. There are many 'non-natural open spaces' including public, private open space and agricultural land which might not be considered "natural" yet are very important to the character of the City and in providing green infrastructure in the urban area. Perhaps a definition or explanation of the phrase "natural environment" would be helpful? Reference to the importance of such areas for wildlife should also be included. The statement needs rewording with greater emphasis on protection of the natural environment, other open land and built heritage. Preferably it should be a separate statement, not linked to meeting the pressure for growth which should be separated. If not, I fear, growth will be read as the priority in a paragraph which is aimed at protecting environmental assets. There are already a number of statements above this paragraph stating the need to meet growth for shopping, housing, employment land, regeneration and affordable housing. This need not be again repeated in this paragraph. I suggest the following wording: 'The City contains an extensive network of open areas, both natural and man-made but often referred to collectively as the 'natural environment'. The natural environment is of great importance to the character and setting of the City and makes a major contribution in the 2 provision of green infrastructure in the urban area. It includes woodland, agricultural land, sensitive landscapes, flood plains, parks, playing fields, allotments and other open space. Many of these areas are also important for nature conservation. In addition there is a high quality built heritage including..... listed buildings and..... designated Conservation Areas whose character is often enhanced by the adjoining natural environment. Together they form the City's pool of environmental assets which add to the quality of life for its residents, workers and visitors and should be positively protected and improved wherever possible.'</p>	<p>Noted The natural environment of Gloucester and its important open spaces are of vital importance to the city and those that are considered worthy of protected status are (or will be) protected in the final City Plan and its supporting proposals and allocations map. The natural environment policies of the JCS will also apply.</p>
<p>Yes + ~making more of views, especially gateway views, by attending to their 'frames.</p>	<p>Noted. The Supplementary Planning Document "Heights of Buildings" affords protection to key views. This will be fully adopted through the City Plan process.</p>

	The JCS and City Plan contain design policies that seek to ensure high standards of urban design.
Concept Statement SECTION: firstly I haven't read all the documents relating to this, from what I have read, it is full of feel good clichés & business speak, and not easy on the eye, frankly, I think it better if i put my comments in box number six, at least then they are all in one place	Noted.
<p>The JCS Housing Background Paper (Nov 2011) identifies a number of opportunities to assist in meeting the housing needs of Gloucester City. However, the specific housing target of the JCS remains to be finalised. The JCS 'Developing the Preferred Option Consultation Document' (Dec 2011 - Feb 2012) identified the need to provide between an additional 3,700 to 11,000 dwellings across the JCS area. We consider that a housing target at the upper end of this scale is necessary to adequately respond to the scale of the requirement. Furthermore, the NPPF not only requires that every effort be made to objectively and then meet the need for housing, but also 'respond positively to wider opportunities for growth' (NPPF, Para 17). It is not therefore enough merely to seek to reach a numerical target, but to explore all opportunities for growth such as that presented at Land East of Winnycroft Lane.</p> <p>A number of constraints (e.g. Green Belt boundaries) potentially restrict the growth of Gloucester, however it is imperative that the Gloucester City Plan delivers the extent growth required by the JCS. It is therefore agreed that Bullet Point 5 represent a key challenge that the Gloucester City Plan will need to address. It should be noted that no such constraints affect the site at Winnycroft Lane, which is just one advantage of this site.</p> <p>It is agreed that the regeneration of the City is an important challenge. Securing new development at sustainable locations can assist in the regeneration of existing communities situated nearby. In considering the appropriate location for new development, it is imperative that the City plan ensures that development benefits as wide a proportion of the community as possible and not just the new community created by development.</p>	<p>The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of development.</p> <p>Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector) as the capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.</p>
Crest supports the key challenges identified within the emerging City Plan and considers them to form an appropriate foundation upon which the Plan's strategy can be based. It is critical that the challenges retain their focus on issues arising within the City's boundaries to ensure that there is a clear distinction between the roles of the City Plan and the Joint Core Strategy and to enable the City Plan's strategy to focus on issues arising within its administrative area. Notwithstanding the above, it is strongly recommended that a new key challenge be included in the next iteration of the Plan that specifically identifies the need to deliver or facilitate the delivery of better connectivity between communities to the south of the City Centre and services and facilities either close to the communities and/or within the City Centre. This issue is currently identified as a problem within the emerging City Plan's proposed strategy but no corresponding solution has been proposed other than dissuading growth in this part of the City and instead focusing growth to the north of the City within Tewksbury Borough's administrative area: 'This direction of growth (southwards along the A38) has led to some communities south of the City Centre feeling isolated and unconnected due to their significant distance from the services and facilities provided in the City. Perpetuating or extending this direction of growth for the urban area will exacerbate this situation and would be incompatible with the principles of sustainability'. The City Plan should regard these connectivity issues as a challenge that needs to be resolved rather than an insurmountable problem. Furthermore this new challenge and an associated strategy would facilitate the delivery of Key Development Principle 13 which seeks to deliver a 'connected City'.	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also need to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
Yes I do agree with the key challenges identified. I would like to see an improvement in Gloucester and the quality of facilities available to residents and tourists. Gloucester needs to encourage people into the city. At night , my teenagers find that the nightclubs are very full and could be of a higher standard. Two nightclubs is not enough for the growing population of Gloucester. It would be good to see a development of a concert hall or theatre for shows and for a higher standard of eating establishment to cater for the older person who may want to spend a little more on a meal. I think it is very important to highlight the historic nature of Gloucester and also the natural beauty that surrounds the city with the glorious countryside, the canal and river Severn	<p>Noted.</p> <p>Further work on employment land matters will be undertaken as part of the City Plan evidence base.</p> <p>A Cultural Strategy for Gloucester has been produced with a Cultural Board to be shortly formed to tackle these</p>

	issues and improve the cultural offer in the City.
Yes, In general agreement but raise issue the point that in an attempt to encourage sustainable development the NPPF is advocating mixed use development strongly. Of concern is that the continuing focus on employment provision in the canal corridor may stifle redevelopment opportunities which could not only vastly improve the southern gateway to the city, but open up important views of the water frontage, increase usage as a sustainable transport route and use the presence of water to help act as a catalyst for inward investment. We would ask that at this stage the city consider a mixed use designation for the area to allow flexibility going forward to make the best use of this important area and take greater advantage of any investment/improvement opportunities in this difficult economic period. The City Centre First approach should also consider improvement of the routes into the city centre i.e. route along West Quay and river into the centre from the Docks. While the regeneration of Glos Docks and The quays is now largely complete, parts of West Quay and the area around the river corridor are still in need of upgrading, a new focus and inward investment. We welcome Development Principal 11, as the canal towpath already acts as a traffic Sustainable transport route for walking and cycling..	Noted.  The City Plan will contain a policy to ensure that development along the main routes into the city are of a high quality of design.  Mixed use development is encouraged where it does not conflict with the city centre first approach to sustainable development.
Our client considers that the identified key challenges broadly cover the issues relevant to the Gloucester area however we make some more specific comments in regard to three of these key challenges:- "... raising the profile, image and overall attractiveness of Gloucester..." - Our client considers that the accompanying paragraph to this challenge should be amended to reference a city-centre first approach. The recently published NPPF recognises centres to be the heart of communities. Therefore measures and resources aimed at raising the profile, image and overall attractiveness of Gloucester would be most effectively directed towards the city-centre rather than sporadic locations around the City. Effort needs to be concentrated in the city-centre, first and foremost, as this will best help to attract investors, employers tourists, visitors, and shoppers back to the city-centre, which will bolster Gloucester's image, profile and fabric. Intertwined with this, our client supports the identification of the Bus Station as a key gateway identified for improvement, but considers that the Kings Quarter as whole should be specifically identified. Whilst the bus station is an important node in the city-centre, its redevelopment is set to be undertaken as part of the wider Kings Quarter, which should be explicit. The achievement of the Kings Quarter redevelopment will deliver significant improvements to the attractiveness of the City Centre and, therefore, based on its contribution to meeting this challenge, should be specifically identified in this supporting paragraph - "...need to increase and make best use of the City's tourism and culture offer..." - It is recognised that many people identified Gloucester as a poor shopping destination. This challenge therefore seeks to capitalise upon opportunities presented within the City to encourage more people into Gloucester, particularly by improving the City Centre and promoting areas such as the Cathedral and Gloucester Quays. Our client considers that the redevelopment of Kings Quarter is a key means by which the heart of the city centre can be rejuvenated and much needed new shopping opportunities provided. Kings Quarter has been a long-standing regeneration objective for the City and therefore should be identified specifically as part of this challenge. Efforts to improve the City's tourism and culture offer should be focussed on the heart of the city centre first and foremost, as these locations are highly accessible for visitors and most sustainable. "The City needs to protect and enhance the core shopping area of the City Centre and raise its retail ranking" - Our client strongly supports this challenge and the identification of Kings Quarter as a key regeneration scheme. However despite the challenge's reference to protecting the core shopping area, limited reference is made to how this will be completed in practice. The national planning policy position, which identifies a town centre first approach and recognises town centres to be heart of communities, provides the context for bolstering this statement and the paragraph should be amended accordingly. It should also make it clear that out-of centre developments will need to demonstrate that there are no suitable sites within the town centre and that they will not have a detrimental impact on town centres in the catchment area and, if they fail either of these tests, will be refused.	Noted.  The work of the Regeneration Strategy addresses the Council's regeneration priorities.  The City Plan will of course sit beneath, and carry forward the aims and objectives of the JCS. However, there is much work to be done and much that can be done alongside the JCS.

Comment Received to Question 3: Do you agree with the key development principles identified to deliver the strategy? If no...	Key points and Officer Response
Key Development Principles to Deliver the Strategy 1. We are pleased to see Key Development Principle no.8 seeking to: 'deliver a City to enjoy by protecting and improving the City's leisure, recreation and environmental assets'. The Woodland Trust supports the work, and is a member of, the Trees and Design Action Group - a unique multi-disciplinary group of professionals and organisations from both the private and public sectors that is seeking to	Noted.  The City Plan will provide for a full

promote the benefits of trees within the built environment. A South West TDAG is currently being set up, led by Exeter City Council. TDAG has produced guidance - 'No Trees, No Future'(Trees and Design Action Group, 2010) - which is aimed at designers, developers and planners to encourage integrated, joined up thinking, strategies, policies and implementation relating to trees in the urban realm. In London, Policy 7.21 of the draft Replacement London Plan advises Boroughs to take the emerging work of the Trees and Design Action Group into account in producing LDF policies and determining planning applications. We recommend that Gloucester City Council considers this guidance in developing its City Plan. We also consider that the City Council has a statutory duty to promote tree planting. Section 197 of the Planning Act (1990) states: 197. Planning permission to include appropriate provision for preservation and planting of trees. It shall be the duty of the local planning authority - 2 (a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees; Further comments are - - The Woodland Trust believes that tree planting, even in constricted urban areas, is especially important because of the unique ability of woodland to deliver across a wide range of benefits - see our publication Woodland Creation- why it matters <http://www.woodlandtrust.org.uk/EN/ABOUT-US/PUBLICATIONS/Pages/ours.aspx>. These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and aesthetic public realm benefits), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling, green infrastructure) and for the local economy (timber, wood fuel and 'fruiting' markets).- The Natural Environment White Paper states in para 2.54: 'We want to create more opportunities for planting productive and native woodlands; more trees in our towns, cities and villages..' - In a letter to all Local Authorities calling for support for the Government's National Tree Planting Campaign ('The Big Tree Plant'), the Environment Minister Caroline Spelman has extolled the many virtues of trees: 'Trees offer so many benefits to our citizens. They capture carbon and hold soils together, prevent flooding and help control our climate. They also add immeasurably to our quality of life by making areas more attractive and healthier places to live. In recent years the number of trees being planted annually across the country has declined, and could decrease further, unless action is taken to reverse this trend' (letter to all Local Authorities, 12th November 2010).- An important publication from the Forestry Commission, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), sets out 'The multiple value of trees for people and places - increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial', and lists (on p.10) the benefits as - Climate change contributions - Environment advantages - Economic dividends - Social benefits.

We would therefore like to see tree planting supported as a key component of improving the City's quality of life in the City Plan. 2. We are pleased to see Key Development Principle no.11 promote the important role that the natural environment can play in climate change mitigation and adaptation strategies. There are a number of ways in which trees offer a particular and cost effective answer to adaptation: - Urban heat island: Trees and woods can reduce the impact of the 'urban heat island'; which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. Dramatic summer temperature differences of as much as 10&#176;C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4&#176;C. 3 (Handley, J and Carter, J (2006) Adaptation strategies for climate change in the urban environment, Draft final report to the National Steering Group, Centre for urban and regional ecology, University of Manchester <a href="http://www.sed.manchester.ac.uk/research/cure/downloads/asccue\_final\_report\_national\_steering\_group">www.sed.manchester.ac.uk/research/cure/downloads/asccue\_final\_report\_national\_steering\_group</a>.pdf). - Air quality: Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources - such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). - Water management - flooding: Throughout the UK winter is predicted to be wetter and summers drier and there is also a predicted increase in the frequency of very heavy rainfall. Trees can reduce the likelihood of surface water flooding, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (Using green infrastructure to alleviate flood risk, Sustainable Cities - [www.sustainablecities.org.uk/water/surface-water/using-gi/](http://www.sustainablecities.org.uk/water/surface-water/using-gi/)). We would like to see tree planting promoted in the Gloucester City Plan for climate change mitigation benefits. 3. Finally, we are pleased to see Key Development Principle no.12 promote the important link between improved health and accessible green space like woodland. The Public Health white paper

range of policies supporting the natural environment and biodiversity in the city.

<p>(Healthy Lives, Healthy People; Nov 2010) states that: "Access to green spaces is associated with better mental and physical health across socioeconomic groups." and that "Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities." The Case for Trees: Forestry Commission (2010) sets out: 'The multiple value of trees for people and places - increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial;, and lists those benefits (on p.10) as -; - Climate change contributions - Environment advantages - Economic dividends - Social benefits.</p> <p>The Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that can be addressed by green infrastructure provision in urban design. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure. The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends: 4 - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. Applying this standard to Gloucester City, with comparisons against other nearby Councils and the SW region, gives the following figures (see table below). It indicates that Gloucester shows below average woodland accessibility compared to the South West as a whole in the smaller wood size category. This presents an excellent opportunity for improving small scale accessible woodland through new tree planting for health and wellbeing benefits in Gloucester. This revised data used can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form. Accessibility to Woodland in Gloucester using the Woodland Trust Woodland Access Standard</p> <table border="1"> <thead> <tr> <th></th> <th>Glos City Council</th> <th>Bristol City</th> <th>Tewkesbury</th> <th>All SW</th> </tr> </thead> <tbody> <tr> <td>Accessible woods % population with access to 2ha+ wood within 500m</td> <td>5.0%</td> <td>13.9%</td> <td>3.1%</td> <td>12.8%</td> </tr> <tr> <td>% population with access to 20ha+ wood within 4km</td> <td>87.7%</td> <td>90.4%</td> <td>35.4%</td> <td>67.4%</td> </tr> </tbody> </table> <p>The research report containing this data, 'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. The full 'Space for People' report can be found at <a href="http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx">http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx</a>. In addition, the UK is one of the least wooded areas of Europe, with just 11.8% woodland cover compared to around 44% for Europe as a whole. The Woodland Trust is therefore working &gt;to achieve its ambitious aim of doubling native woodland cover over the next 50 years. We would like to see an increase in accessible urban tree planting supported in the City Plan in order to deliver health &amp; wellbeing benefits for Gloucester.</p>		Glos City Council	Bristol City	Tewkesbury	All SW	Accessible woods % population with access to 2ha+ wood within 500m	5.0%	13.9%	3.1%	12.8%	% population with access to 20ha+ wood within 4km	87.7%	90.4%	35.4%	67.4%	
	Glos City Council	Bristol City	Tewkesbury	All SW												
Accessible woods % population with access to 2ha+ wood within 500m	5.0%	13.9%	3.1%	12.8%												
% population with access to 20ha+ wood within 4km	87.7%	90.4%	35.4%	67.4%												
<p>The statement in the final sentence of Key Development Principle 3 (city centre first approach) should in Royal Mail's view either be removed or toned down so that a balance can be achieved with focus on the regeneration of the city centre without detrimental effect on the wider Gloucester City Council area. As alluded to in section 3 above, in Royal Mail's view there should be a separate Key Development Principle that takes a "whole economy" approach to employment development and builds in greater flexibility for employment generating non-B class uses to be development on employment sites in line with the findings of the 2011 Nathaniel Lichfield employment land study and recent Government guidance within the NPPF.</p> <p>Royal Mail also encourages the City Council to consider including a further Key Development principle that promotes the benefits of mixed use development with commercial and residential development taking place alongside each other. This is required for consistency with the ninth core planning principle of NPPF Paragraph 17</p>	<p>Noted.</p> <p>It is important that the city centre first principle for retail development continues to be applied in order to protect the city centre from unacceptable vacancy and underinvestment issues. However this should be done without stifling leisure and commercial investment that could reasonably take place outside of the city centre that would not harm the vitality and viability of the city centre and its retail offer in particular.</p>															
<p>As general objectives, we have no objection to the key development principles. some reference could be made to working with landowners and developers to stimulate and proactively bring forward vacant and redundant sites for development. References are made within the listed principles to a level of housing growth and it is understood that such levels of growth are being addressed through the Joint Core Strategy.</p>	<p>Noted.</p> <p>The policies of the City Plan are intended to provide flexibility that</p>															



	allows for development to proceed where possible.
CPRE fully supports the Key Development Principles, in particular continuing the long standing City Centre first approach, making the most efficient use of previously developed land and reducing the need for greenfield development: the proposed Kings Quarter redevelopment offers particular opportunities for revitalising the City. In relation to Principle 8 and Principle 11, we have advocated (above) that a Green Infrastructure Strategy is prepared as part of the Plan. This would ensure a focussed approach to conserving and enhancing landscape and biodiversity assets and improving open space and recreation provision. It should also address the need for enhanced opportunities for walking and cycling and access to the countryside surrounding the City.	Noted.  The strategy for the JCS and the City Plan adopts an approach of maximising urban capacity and the use of brownfield land before having to seek greenfield sites or areas located in the Green belt for development.  A Green Infrastructure Strategy has been produced as part of the JCS process. The City Plan will carry the strategy forward.
Referring to 'Key Development Principles to Deliver the Strategy' (paragraph 8) I note that the concept of 'environmental assets' is introduced which doesn't appear in the paragraphs covering protection of the natural environment or built heritage. It would be useful to introduce this phrase earlier as suggested above. Ironically, para. 8 does not mention the 'natural environment' which the previous paragraphs do. Para 8 should include the phrase to establish a consistency of approach. As it stands it only includes certain categories for improvement or protection and misses others e.g. agricultural land and woodland. Am I mistaken or did I miss the reference to leisure and sport in the earlier paragraphs? If there is no reference then I would suggest that these important community issues, which should include provision of other community facilities, health services etc. should be included. With the level of development envisaged, it will be absolutely vital for such facilities to be supported and enhanced if the City residents are to enjoy a better quality of life. I would suggest amendments so paragraph 8 reads: "8. To deliver a City to enjoy by protecting and improving the City's environmental assets, leisure and recreation opportunities. The City's built heritage and natural environment, including areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved and protected, particularly Alney Island, the setting of Robinswood Hill and areas of urban fringe. The wide range of leisure and sporting opportunities that the City already enjoys will be supported....."	Noted.  The natural environment of Gloucester and its important open spaces are of vital importance to the city and those that are considered worthy of protected status are (or will be) protected in the final City Plan and its supporting proposals and allocations map.  Additional community, health, sporting and recreation facilities will generally be supported in principle at appropriate locations in the city.
Yes + using the same idea as Tesco sponsoring local retail: ~make a city centre presence a condition of opening outside the centre in, eg Docks, retail parks. ~co-operate with manufacturers to consider the same sponsorship, maybe setting up outsourced admin functions in city centre empty offices - could include apprenticeship. ~city centre collection points for online purchases (agencies).	It would be unreasonable and beyond the regulations of the planning system to insist upon a condition of this nature.
We are broadly in agreement with the 13 Key Development Principles identified by the Part 1 consultation document. Key Development Principle Number 5 identifies the provision of 325 new dwellings in the City every year with additional homes to be provided through well integrated urban extensions on the City's edge. It is noted that this 'Key Development Principle' should be updated should be updated in line with the emerging JCS housing target, once finalised. This has the potential to alter the level of growth required at Gloucester and potentially the development strategy to be adopted. Accordingly, we wish to reserve the opportunity to comment further on this development strategy at the appropriate stages since the level of growth required will directly influence the number and nature of sites that will be required to come forward for development.	The City Plan seeks to maximise the spare capacity of land within Gloucester whilst seeking an acceptable approach to design and sustainability in all specific cases of development.
Whilst we welcome the 'Development Principles' that have been set out, we consider greater focus should be made on the environment to ensure the resultant Plan is truly sustainable. We believe the following themes should be included (or given greater emphasis) within the 'Development Principles' when taking the Plan forward: Flood Risk Flood risk is a key constraint and its consideration should be a prominent 'development principle' for the City Plan. We do not consider its relative importance is reflected in the consultation document. We have provided much guidance in this respect for the emerging Joint	Noted.  We believe that these environmental issues including flood risk, sustainable

Core Strategy (JCS) and this advice remains pertinent for this consultation. We append our consultation letter which responded to the latest JCS public consultation exercise (appendix A). Sustainable Drainage Systems (SuDS) The incorporation of SuDS should be a key 'development principle'. The SuDS approach can play a key role in delivering water quality improvements and Water Framework Directive (WFD) objectives. It involves using a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds, wetlands and green roofs to reduce flood risk by attenuating the rate and quantity of surface water run-off from a site. This approach not only provides betterment in terms of flood risk but should also offer other benefits in terms of promoting groundwater recharge, water quality and biodiversity benefits. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. SuDS seek to mimic natural drainage systems and retain water on or near to the site, when rain falls, in contrast to traditional drainage approaches, which tend to pipe water off site as quickly as possible. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by reducing the quantity of surface water run-off from a site and the speed at which it reaches water courses, promoting groundwater recharge, and improving water quality and amenity. The range of SuDS techniques available means that a SuDS approach in some form will be applicable to all developments. Provision for long-term maintenance should be provided as part of any SuDS scheme submitted to LPA. Model legal agreements that provide a mechanism for SuDS maintenance can be accessed on the CIRIA web site at <http://www.ciria.org/suds/icop.htm>. Climate Change We welcome climate changes inclusion within principle 11. However, we would take this opportunity to stress how important a principle tackling climate change is. It is a principle that should permeate throughout the policy base. The Plan should seek to reduce dependency on fossil fuels, reduce carbon emissions, secure sustainable construction methods, aim for highest standards possible and embed resilience and adaptation to climate change. We would advocate retrofitting existing buildings with energy efficient measures. (As examples, the Forest of Dean Core Strategy has included such a policy and Uttlesford District Council have a policy in their local plan for retrofitting when undertaking house extensions). Land Contamination Given Gloucester's industrial heritage, the importance of remediating historic contamination through regeneration should be a key 'development principle'. This important principle is currently absent from the consultation document. From a groundwater perspective, we consider the Plan needs to promote the protection of groundwater resources and re-development of Brownfield sites (contaminated land). We have produced a Groundwater Protection Policy (also known as GP3), for managing and protecting groundwater, setting out practices to prevent or mitigate impacts on groundwater. For further information: <http://www.environment-agency.gov.uk/research/library/publications/40741.aspx> <http://www.environment-agency.gov.uk/research/library/publications/40741> We need to manage and protect our groundwater resources from pollution if we are to continue to have sustainable supplies in the future. We also want to protect aquatic environments and ecosystems that depend on groundwater. Groundwater is important. It supplies local private water supply abstractors and river base-flows to local rivers within the joint strategy area, but pollution and demands for water puts the resource under increasing pressure. Groundwater also has many benefits, including to: society - by providing water that needs little treatment before it can be drunk the economy - groundwater reserves are worth an estimated £8 billion (England & Wales) the environment - all rivers are partly fed by groundwater. Some rivers and wetlands are completely dependent on it. The approach of GP3 utilises two main tools: 1. Resource Protection involving aquifer classification and mapping of water resources into Principal, Secondary A & B and unproductive strata. (Read more about our aquifer classifications here: <http://www.environment-agency.gov.uk/homeandleisure/117020.aspx> <http://www.environment-agency.gov.uk/homeandleisure/117020.aspx> 2. Source Protection which defines groundwater Source Protection Zones (SPZs) around those catchments to public water supply boreholes and certain other private supply boreholes. Please note: There are many other licensed and unlicensed abstractions supporting industrial, agricultural, domestic and other uses, which are of local consideration within the joint core strategy area which will not necessarily have a specific SPZ catchment designated. Those sources without a designated SPZ have a 50m Zone 1 protection zone applied for groundwater protection purposes. (Read more about SPZs here: <http://www.environment-agency.gov.uk/homeandleisure/37833.aspx> <http://www.environment-agency.gov.uk/homeandleisure/37833.aspx> ) Biodiversity We welcome the commitment in 'development principle' 8 to protect and improve environmental assets. However, we believe the importance of enhancing the areas habitats warrants a stand alone 'development principle'. This would serve to amplify its importance within the Plan as it is taken forward. Water Framework Directive It should be an objective of the City Plan to contribute towards the aims of the Water Framework Directive (WFD). The WFD aims to prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters. Planning authorities have a duty under the WFD to take account of the River Basin Management Plans (RBMPs) and can help deliver WFD objectives. Planning policies and activities can ensure that new development does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. Failure to comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK. Local Authorities have a responsibility not to compromise the

development, SUDS, biodiversity and ground water protection are now fully embedded within the City Plan document and the accompanying Sustainability Appraisal.

Severn Trent has been consulted at every stage of the plan making process and are consulted on major planning application.

<p>achievement of UK compliance with EU Directives. Foul Drainage Infrastructure Development should be supported by adequate and timely sewerage infrastructure to protect water quality and prevent foul flooding. Adequate foul drainage provision is therefore a key 'development principle. If there is inadequate capacity, development could put pressure on the sewerage system leading to more frequent discharges of sewage to rivers and could compromise WFD objectives. Planning Policy should require that sewerage capacity be fully investigated and any required improvements made in a timely manner to support development. There should be no unplanned increases of sewage discharges from existing storm overflows and no new storm overflows as a result of new development. We would expect that foul drainage from any development will discharge to the public sewer. The capacity of the sewer system will need to be confirmed with Severn Trent Water Ltd. The ability of the sewage works to cope with increased flows and potentially improved treatment standards will need to be discussed with the water company and ourselves. Any development will need to check if the sewerage system has any storm water overflows on the system. Any increase in capacity within the sewer may cause these to overflow more often and this situation would be objected to by us.</p>	
<p>Crest broadly supports the majority of the key development principles identified as being sufficiently robust to deliver the City Plan's vision. Development Principle 13 is particularly relevant to our comments above in respect of increasing connectivity and accessibility between new neighbourhoods along the A38 corridor and the City Centre. This principle seeks to deliver a 'connected City' however this holistic approach to improving connections within and through the City has not been translated into the Plan's strategy. This inconsistency between the strategy and Development Principle 13 needs to be resolved and the strategy amended accordingly. As briefly discussed in relation to Question 4 above, the City Plan's proposed 'City Centre first approach' needs further clarification to ensure that it does not apply to all development as currently suggested in Development Principle 3. Having regard to the previous comments, the key development principles should seek to focus on challenges and solutions within the City as opposed to focusing on issues in other local authority areas that shall be addressed in other plans. Accordingly it is submitted that Development Principle 5 be amended to remove reference to the delivery of urban extensions on the City's edge; it is not the function of the City Plan to allocate land outside of its administrative boundary for development and therefore it is pre-empting the Joint Core Strategy.</p>	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also need to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
<p>I think that development at the north of Gloucester is probably the best option. As a Quedgeley resident we have seen some disastrous development at Hunts Grove and Kingsway and people feel put upon. Our facilities such as doctors have deteriorated and it is very difficult to get appointments. The roads at Kingsway are tight and difficult to manoeuvre around and the quality of the development seems poor at the moment. I don't know if what else is planned for this area, but some landscaping and tree planting would help.</p>	<p>Noted.</p> <p>The City Plan will contain a number of policies that will help to secure good layout and design. In addition to this there will be facilitative policies around the provision of health care and community facilities should providers come forward wishing to develop these uses.</p>
<p>Key Development Principle deals with encouraging inward and indigenous investment. We are concerned that an over-supply of business and industrial units will create a desert of empty industrial units - which would be most off-putting to potential investors in Gloucester, and create a poor image for the City going forward. By way of background, we own industrial units 10-16 Brunel Court, off Stevenson Drive, Waterwells Business Park, Gloucester, as commercial investment properties. Our comments particularly relate to land east of Waterwells Business Park, but they are also relevant to other areas earmarked for employment use. In our experience there is currently an over-supply of employment land in this part of Gloucester. This is unlikely to change in the next few years. For your information, we bought the Waterwells units in 2004 and 2005. They have only been fully let for less than 8 months since then. At the moment several of the units are empty and we have had great difficulty trying to find new tenants, despite offering very considerable incentives. Quite simply, the current demand is very low. We are concerned about the impact of further development on existing land owners, and the overall economy of Gloucester.</p>	<p>Noted.</p> <p>Further work on employment land matters has been commissioned and will form part of the evidence base to inform the final policy position within the City Plan.</p>

<p>We are certainly not against the development, but we are concerned that if too much development takes place, it will have a negative impact. Unfortunately parts of Waterwells are becoming a bit of a desert already. Put simply, the creation of industrial units does not guarantee their take-up, and may have the contrary impact. Instead, we are strongly of the view that any development should be phased, as and when the need arises. This would avoid the depressing sight of empty units, and would be in the long-term interest of the City as a successful destination for inward and indigenous investment. In addition, there is a need to plan to avoid too much strain on local highways. There are already areas of congestion, for example at the entrance to junction 12 on the M5 and on the A38 towards the City. By way of background, we also own commercial properties in Cheltenham, Tewkesbury, Cirencester and Evesham. We do not suffer to such a degree from such over-supply in these other locations.</p>	
<p>On behalf of our client, we provide comments on the individual principles below:- Principle 1 - Aviva Investors support the reference to ensuring development contributes to transforming the City which brings regeneration benefits and makes the most efficient use of previously developed land and buildings. Specifically in relation to city-centres, opportunities whereby previously developed land can be used efficiently, for a mixture of uses will contribute to the vitality and viability of the centre, should be encouraged. Principle 3 - Our client strongly supports this principle and the identified 'primacy of Kings Quarter redevelopment' however we require that specific reference is inserted at the end of this statement which explicitly states that development will not be supported where it will also have an adverse or negative impact upon planned or committed investment. Currently this statement makes no reference to investment specifically and an amendment to this statement will help to ensure this Document more closely resembles the provisions set out in paragraph 26 of the NPPF. Principle 4 - Our client supports the identified primacy and function of the City Centre however we wish to re-highlight the heightened need to improve the health and prosperity of the City Centre specifically. Evidence published recently highlights that the comparison retail offer of Gloucester city centre is limited for a city of its size and is considered a weakness of the overall retail offer (see paragraph 6.7 of the DPDS critique). The pertinence of this issue is also highlighted by the City Centre's observed reduction in market share in comparison goods, which has decreased by 12% between 2001 and 2011. Therefore our client requires this principle to be amended slightly to more fully recognise the importance of addressing this evidence so as to bolster the 'city centre first and foremost' policy. Principle 5 - Our client supports the reference to housing growth and affordable housing provision; however this principle should also reference the need to consider viability. This reflects the approach set out in national planning policy - see NPPF paragraph 173 which states "pursuing sustainable development requires careful attention to viability and costs in plan making and decision-taking". Principle 6 - Aviva Investors support the provisions of this principle and the aim to deliver a City that encourages and facilitates inward and indigenous investment. However this principle should be expanded slightly to reference the national planning policy requirement which provides for the protection of existing, planned or committed investment in a centre against significant adverse impacts in accordance with (paragraph 27 of the NPPF).</p>	<p>Noted.</p> <p>The work of the Regeneration Strategy addresses the Council's regeneration priorities.</p> <p>The City Plan seeks to protect the city centre and is fully compliant with with the NPPF.</p> <p>Further work on retail will be undertaken as part of the JCS process.</p>
<p>As regards the key development principles: We endorse the statement that "development will not be supported where it will have a demonstrable negative impact on the City Centre and its regeneration" - we only trust that the decision makers will have the courage to take up this challenge; - In delivering sustainable communities we hope that greater emphasis will be applied regarding City Centre living and that future opportunities for City Centre development include a strong steer for the inclusion of homes. This would also apply to greater drive towards developing a clear 'living above the shop' policy; - The emphasis on 'high quality and skilled jobs for the local population' has long been championed by CCCP. However the drive towards extensive retail &amp; leisure provision can only mean that the majority of new jobs created will be part time, low paid. Therefore whilst jobs are welcome of course we really do need to ensure we give stronger planning emphasis to employment opportunities and developments which include 'high quality .... jobs' No further comment as regards this part of the City Plan as the key development principles outlined do in many aspects reflect the recently produced City Vision which we fully endorse.</p>	<p>Noted.</p> <p>The City Council is committed to the regeneration of the City Centre. The inclusion of housing within the centre is a key component of achieving a sustainable regeneration that will add vitality and activity.</p> <p>Further work will be undertaken in the form of an economic strategy.</p> <p>More consideration will be given to need to retain or attract 'high quality and skilled jobs'.</p> <p>The City Plan will contain a policy that protects quality employment land.</p>

Comment Received to Question 4: Do you have any further comments to make?	Key points and Officer Response
<p>I have just read the City Plan, paying special attention to future plans for sporting activities in the city. Once again it is rhetoric without backing it up with actions, and as a past member of Gloucester Civil Service CC, and having suffered the trauma of ground moves twice recently until we were finally shut down through a lack of ground facilities in the city, I am appalled by what the future holds for sport in Gloucester, if there is any at all? The sections below are pasted from the City Plan, and if they were true I would rest a bit better, but as this won't happen it just seems a waste of time supporting anything in this city, which is rapidly moving downhill.....no wonder we are the laughing stock of surrounding towns and cities!! 2 Valuable heritage, areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved The wide range of leisure and sporting opportunities that the City already enjoys will be supported To improve the health of Gloucester's residents by improving access to informal and formal green spaces thereby providing opportunities for people to pursue healthy activities and lifestyles.</p>	<p>Noted.</p> <p>The City Plan will provide policies that help to improve facilities for sport and recreation in the city, as well as enhancing and protecting heritage assets and the natural environment.</p>
<p>It would be useful to number the pages and paragraphs for ease of reference.</p>	<p>Noted.</p>
<p>The vision expressed does not provide a sense of place and does not set out a clear vision of how the city will change over the next 20 years. The wording could apply to most cities in the UK! It would be helpful if this vision were to take on board the 'place making' agenda and set out how the city and its various parts are envisaged to change over the plan period. The role of Gloucester in its wider settings is important and an understanding of the city's relationship with neighbouring areas, including Stroud, would inform its development.. Whilst this aspect may be addressed to some extent within the JCS, Stroud is not party to that. The City Plan is an appropriate medium for setting out the Gloucester City view of that relationship and how the two areas 'work' together.</p>	<p>Noted. These are important issues and Gloucester city will continue its duty to cooperate with Stroud with regard to cross boundary growth issues. The city plan does need to be read alongside the JCs in this regard as the JCS in particular addresses these cross boundary and south of Gloucester issues. The City Plan will also address this issue more fully as it progresses.</p>
<p>Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Royal Mail is a universal service provider under the Postal Services Act 2000. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a sister company to Royal Mail) operates the national network of post offices and sub post offices. The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly. Royal Mail will be making representations at the further consultation stages of the City Plan and wishes to have a continuing dialogue with Gloucester City Council and about its requirements in Gloucester.</p>	<p>Noted.</p>
<p>The plan needs to focus on delivery and ensure that policies and allocations are flexible enough to stimulate delivery, particularly in current challenging economic circumstances and early years of the plan. References are made to the potential for an Infrastructure Plan and an early draft of such a document will ensure a clear understanding of delivery issues.</p>	<p>Noted.</p> <p>The policies of the City Plan are intended to provide flexibility that allows for development to proceed where possible.</p> <p>An Infrastructure Delivery Plan for</p>

	Gloucester will be prepared as part of the City Plan evidence base.
Improvement of the bus station is essential but it needs to be linked to a more pedestrian friendly access between the it and the railway station. At present people transferring from train to bus or vice-versa have to cross Bruton Way with its slow-acting pedestrian lights. Yet a number of bus routes, eg Stagecoach 1,4,7,9,91,93 actually pass in front of the railway station without stopping. Either there should be a new footbridge from the rail to the bus station or buses should stop nearer to the railway station. Sometimes it is quicker to walk (or rather run) from the railway station to the ASDA bus stop instead of trying to cross Bruton Way but this involves crossing Metz Way (where the lights are also slow to change for pedestrians) and having to stand in a two-way cycle lane in order to board the bus. It would be better not to have cycle lanes on pavements because speeding cyclists are a hazard to pedestrians.	Noted.  The planned improvements to the bus station, rail station and the Kings Quarter regeneration scheme will bring significant improvements for pedestrians in this area of the city generally.
This document would be much easier to comment on if the paragraphs had been numbered	Noted
To Tesco and manufacturers (being new here, I don't know any local large manufacturers) add the big banks. Have you involved them with the city's plans?	Everyone has the potential to be involved in the City Plan consultation which is widely advertised and consulted on, including the major supermarkets, local manufacturers and other local organisations.
firstly, to plan for the future, it only right that you should look at the past briefly, there have been frankly quite a few monumental disasters, in this city regarding planning, the city centre wasn't rebuilt because of ww2 bombing, most of the city centre was ripped apart by the Jellicoe plan of 1960, which very sadly followed the country wide, concrete >jungles, such as the bull ring[Birmingham] and Milton Keynes[there are countless others schemes around the uk]huge swathes of Gloucester's ancient buildings, streets were wiped off the face of the planet, has anything been learned locally, no not at all, amazingly its still going on, the last twenty or so years its got worse, the docks, with no thought whatsoever, about the long term future of transport, when fuel runs out, which it will, that's a well known fact, the canals/railways will comeback into there own, also very important, to remember that the global economy, will NOT last, why A, the standard of living[wages] in the emerging economies, will rise to our levels eventually, so there will be no profit producing things on the other side of the world. B - as I've said above fuel will run out, so on the logistics side alone, the uk will eventually become more reliant on home grown produced products, have you once thought about this, clearly not in recent times, because the docks/monk meadow, have been developed, in all for limited development yes, but if ever the docks were needed again for there original purpose, a docks, I fear its been and is being over developed, same can be said regarding the railway triangle. PLANNING - buildings developments etc now this is something, that has been totally ignored, and no thought has gone into this for decades, developers, planners etc have been aloud to build shops, flats etc,that have no respect at all for the local surroundings, history of the area at all none look at the flats/carpark in the barge arm of the docks as one example, hideous, they look like nothing from the historical past at all, if in future there are new buildings or ones that are going to be refurbished in the centre, please at least give them old style frontages, to make the main streets more historic looking, even persuade future developers to even purchase old building from elsewhere, like they have at the black country museum, beamish, which brings in masses of tourist, GATE STREETS SHOPPING[RETAIL]PARKING firstly the gate streets needs shops, to bring people into the city and spend money, perfectly simple to understand, convenience to those shop is key, so why were the gate streets totally closed off to traffic, when the gate streets were open to traffic, footfall into the then shops was much higher, why you ask, well it not just the obvious answer, more cars, its because people walked on the pavements next to the shops ,I'm not saying open the gate streets all the time I'm suggesting, open them at certain times just as an experiment. PARKING - parking meters rake in the money, for those who want to shop at the moment. BUT, but getting rid of the meters, that would transform footfall into the city, thus, more people, into the shops, more profit, higher council tax[but not to high as to put retailers off, there is a balance] SHOPPING as we know the retail bubble has burst, sadly I fear the quays development, was a fatal mistake, firstly it was built in the wrong place frankly, I understand the quays/dock city centre connection, but it hasn't worked out like that, yet again the building itself is totally out of kilter with the historical docks, frankly it looks like a 1970s hospital building, from the south, and again takes people out of town. CONCLUSION - I do hope you read this, these are not the	The various comments are noted.  The City Plan has the policies and evidence base support that is required to seek good quality development and good design in development for the city.

<p>same old tired views of ,oh well lets follow everybody else, retail this retail that, those days are gone, out of town shopping developments are good for the suburbs, but not near or next to the city centre they take people away, the railway triangle should be developed, with future manufacturing in mind due to its connections to the railway, same for a docks we have docks but nowhere to dock, all future buildings and present ones[when refurbishment permits] must look historical in the gate streets, this has been totally overlooked by planners new and old, fuel will not run out in the time frame of 30 years but when it does, we would be leading the way as far as planning is concerned, and be prepared when it does</p>	
<p>Part 1 of the City Plan identifies the next step in plan preparation is the publication of a Places and Sites document (Part 2). This document will identify sites to meet the City's growth requirements. The preparation of this document should coincide with the finalisation of housing targets to be identified through the JCS. In light of the next stage, this submission promotes that Land East of Winnycroft Lane to provide residential-led development adjoining, and contained by, the existing built limits of Gloucester. Development at this location is considered highly sustainable in view of the existing facilities nearby to the site. Development could also provide the opportunity to enhance the wider community within the Matson and Robinswood Ward; recognised as falling within the 10% most deprived wards in the country. We set out below further background to Land East of Winnycroft Lane and enclose a Facilities Analysis Diagram which demonstrates the sustainable nature of the site, in light of the existing facilities and services in the immediate vicinity of Winnycroft Lane.</p> <p>Land East of Winnycroft Lane - The site identified as part of this consultation response is under single ownership. The land lies to the east of Winnycroft Lane comprises 20.21 hectares. The site is bounded by: Winnycroft Lane and existing residential development to the east; Lane associated with Winnycroft Farm to the north, beyond which lies residential development; The M5 motorway to the east; and Agricultural land to the south. The site is currently in agricultural use and is bounded by mature hedgerows. A number of further hedgerows run through the site and are interspersed with trees.</p> <p>Accompanying this submission is an assessment of nearby facilities and services, overlaid on a map base. This analysis highlights: that Matson Avenue local centre, 2 primary schools (Robinswood and Moat Primary) and 2 surgeries (Wheatway ;and Matson Lane) all lie within 1 kilometre of the site; Abbeymead District Centre, Gloucester Academy, along with further primary school and health care services, are situated within 2 kilometres of the site; existing bus routes, providing access to Gloucester City Centre, the train station and Gloucester Business Park, run close by to the site. Residential development at Winnycroft Lane would provide the opportunity to extend these routes improving service provision for the existing local community as well as servicing the site itself; the site is situated close by to areas of public open space and the Robinswood Hill Country Park; and the contained nature of the identified site, situated between existing residential development and the M5 motorway.</p> <p>SHLAA Assessment - The site has previously been identified by SHLAA site reference P-G-003 (December 2011). The Council's assessment of the site highlighted: the site can be accessed from the highway by Painswick Road and Winnycroft Lane; bus services operate in close proximity to the site; the site is located in fairly close proximity to a variety of primary services and jobs at Gloucester, though little within immediate vicinity; and the site is fairly well located to access key local services and facilities. The Peripheral SHLAA Site Conclusion identified the availability and achievability of the site was 'to be confirmed'. As part of the submission we confirm that the land is available for development. Allowing for the publication of the City Plan and obtaining the necessary planning consents, we consider that development could commence on site within a 3-5 year timeframe. Despite the above credentials, the SHLAA considered that the site was not suitable for development given that landscape constraints could not be overcome. This matter is considered in further detail below.</p> <p>Landscape - The site is currently designated as a 'Landscape Conservation Area'. This designation extends significantly to the west, covering Robinswood Hill and its surrounds. The site identified by this submission is, however, separated from the Robinswood Hill by existing residential development situated between Winnycroft Lane and Matson Lane. Within the South West Draft RSS Urban Extension Evidence Base Review (February 2077) Winnycroft Farm forms a small part of Land Cell L. The assessment of this Land Cell identified a 'notable' constraint was that the majority of it fell within the Robinswood Hill Special Landscape Area. A 'notable' constraint was defined as: - 'a factor to prevent or restrict strategic development in relatively small parts of the land cell; this may require mitigation, infrastructure and / or sensitive masterplanning to overcome'. Accordingly the synopsis for the Land Cell commented - 'with the exception of the Robinwood Hill Special Landscape Area, the evidence base has not identified further environmental / landscape constraints. There may therefore be development potential in this area if a sustainable transport strategy for this part of Gloucester could be formulated. Due to the potential site capacity, the site was assessed as having 'non-strategic development potential'; not suitable for identification through the Regional Spatial Strategy. However this overall analysis of Land Cell L does not rule out parts of this area being suitable for more modest expansion coming forward through the LDF process.</p> <p>We recognise the wider landscape contribution that the Landscape Conservation Area makes to the setting of the city of Gloucester, in particular in the vicinity of Robinswood Hill. However, Land East of Winnycroft Lane is separated from Robinwood Hill (Country Park) by existing residential development. Further residential development also lies to the north and north west of the site. The existing context of residential development, along with the M5</p>	<p>The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of development.</p> <p>Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector) as the capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.</p>

motorway, provides defensible boundaries for new development at this location. The JCS Broad Locations Report (October 2011) also assessed 'Winnycroft Farm' as part of a larger land parcel identified by reference 'G6 - Land at Brookthorpe with Whaddon'. The north east of Site G6 (i.e. land around Winnycroft Lane) was identified as having a medium landscape sensitivity, due to visual associations with Robinswood Hill and the Area of Outstanding Natural Beauty. However it was also recognised that this land parcel 'has a loss of tranquillity and is overlooked by housing development in Matson.'

Accordingly, the development of Land East of Winnycroft Lane could be achieved without detrimental impact upon the immediate landscape and wider setting of Robinswood Hill. Sensitive masterplanning and design, coupled with landscape mitigation measures, would enable development at this location without significant adverse impact on the environment. This approach is in accordance with the key sustainability theme of the NPPF, which seeks a balance between economic, social and environmental issues and the delivery of much needed housing growth. Green Belt - It is noted that the JCS Green Belt Assessment considered the inclusion of 'land south-east of Gloucester, around Robinswood Hill' within the Green Belt. The assessment, finalised in September 2011, identified no clear case for inclusion in the Green Belt, given the land does not perform a Green Belt role and would not physically link to the main area of Green Belt. It was considered that unrestricted sprawl could be controlled through other policy measures. Historic Environment - The scheduled Ancient Monument (SAM) of Sneedham's Green Moated Site lies to the south of the identified site at Winnycroft Lane. Land surrounding this SAM is identified as an Area of Archaeological Interest; Appropriate mitigation measures can be implemented to enable development at Winnycroft Lane, whilst safeguarding the SAM and its settings for the long term. Through the course of the Gloucester City Plan site allocation process, we would be happy to further explore the archaeological value of the site through appropriate technical assessments. Delivery - We confirm that the site is available for development. Subject to a development allocation and achieving the necessary planning consents, we envisage that the site could be delivered in a 3-5 year timeframe. Summary - In conclusion, we promote the allocation of land east of Winnycroft Lane for residential-led development through the Gloucester City Plan. The accompanying plan highlights the sustainable credentials of the site, by way of its proximity to existing education, community, employment and recreation facilities. The site offers a naturally contained development area that can deliver necessary housing growth at Gloucester in a sustainable location. Development at this location would have the added benefits of reducing the pressure for Green Belt release and not impinging on environmental assets of importance. It is envisaged that the site could deliver in the region of 300-450 dwellings. This is based on a density of 30 dwellings per hectare and allows for appropriate open space provision and landscape mitigation. The JCS process is currently assessing the additional level of growth required across the three administrative boundaries of Gloucester City, Cheltenham Borough and Tewkesbury Borough Council's for the period 2021-2031 (Phase 2). Land East of Winnycroft Lane would contribute to the development requirements of the area within this timeframe. The site also has the benefit of not being reliant on the delivery of significant new infrastructure and could therefore be delivered early in the plan period ahead of larger land releases that will need significant early infrastructure before housing delivery is commenced. We trust that the Council will take the above comments into consideration in order to inform the on-going preparation of the Gloucester City Plan. In light of our land ownership interest, we would be grateful if you would keep us informed of the on-going plan preparation process.

Although the City Plan confirms the requirement for it to be prepared in the context of the emerging Joint Core Strategy (JCS), it fails to acknowledge the need for the plan to be prepared having regard to the provisions within the emerging Stroud Local Plan. This is a critical omission that will need to be remedied owing to the emphasis that Section 110 of the Localism Act (2011) places on the Duty to Cooperate and the fact that Stroud District directly abuts the administrative boundary of Gloucester City and already accommodates growth as part of the enlarged Gloucester Urban Area. It is therefore submitted that the City Plan should be prepared having regard to both the emerging JCS and the Stroud Local Plan.

Noted.

The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also needs to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.



<p>I would like to see Gloucester grow and become once again the hive of activity it once was. But we need a high quality development to encourage aspirations and provide work. Also I would like to see Gloucester as a healthy city with low pollution in the air and waterways, with lots of opportunity for exercise, green areas, parks, and an athletics track to be proud of that could double as a stadium for events and concerts. Gloucester needs entertainment venues for its residents that are safe and fun. Gloucester lacks high quality nightlife for all its residents. People should have a reason to come into the city centre, somewhere to eat, a nighttime cafe culture (al Fresco eating) and entertainment. All these things provide employment, we have the population but they are going to Cheltenham for their nightlife and entertainment or to Bristol for shopping and nightlife. People are travelling as far as Birmingham and Cardiff for nightclubs and spa weekends, we need a high quality hotel in the city. If you would like a four/five star wedding venue you have to look outside the city. Spa breaks are very popular, and bring in tourists who would shop, we don't have a suitable place in Gloucester. an outstanding spa like Bath be a great asset.</p>	<p>Noted.</p> <p>Major regeneration in the city as is being planned for in the City Plan should continue to bring additional leisure and recreational facilities for the residents of Gloucester.</p> <p>Policies on Health and Wellbeing including Air Quality and Pollution have been prepared and tested through the Sustainability Appraisal.</p>
<p>Suggest that Green infrastructure is more closely linked to infrastructure provision (perhaps be reordering the list to put current items 2 and 8 closer together or by cross referencing. Also make it clear that new growth will be able to support improvements to existing strategic and green infrastructure rather than simply provide new.</p>	<p>Noted.</p>
<p>We have previously raised concern, on behalf of our client, about with the order in which the City Plan is being drafted. The Joint Core Strategy (JCS) is currently at an early stage - 'Developing the Preferred Option' and we question the logic behind progressing the City Plan, which is required to accord with the JCS, ahead of finalisation of this JCS document.</p>	<p>Noted.</p> <p>The City Plan will of course sit beneath, and carry forward the aims and objectives of the JCS. However, there is much work to be done and much that can be done alongside the JCS.</p>

Other Comments Received not in the questionnaire format	Key points and Officer Response
<p>Western Power Distribution may have/has a number of strategic electricity distribution circuits (which can operate at 132,000 volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary. Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.</p>	<p>Noted.</p> <p>Development Management have been notified of Western Power Distribution's request to be notified of Major applications.</p> <p>An Infrastructure Delivery Plan will be produced as evidence base to the City Plan.</p>
<p>NHS Gloucestershire welcomes the proposals set out in the City Plan Consultation and Kings Quarter Planning Concept Statement documents. The</p>	<p>Noted.</p>

availability of safe, affordable, warm housing is essential for health and wellbeing and we welcome sustainable infrastructure and housing growth to support the needs of the growing population in Gloucester. The proposed regeneration, infrastructure and housing developments provide a unique opportunity to significantly improve health and wellbeing. There are examples in Europe (for example Freiburg) where health outcomes in the local area have been significantly improved by the well considered design and layout of the community and associated infrastructure. With a growing population in Gloucester the role of community infrastructure in enhancing physical activity; providing access to local healthy food and protecting well-being through social cohesion cannot be understated. Prevention is always better than cure and we welcome the explicit references to the role of this proposed development in enhancing the health and wellbeing of people in Gloucester. The Health and Social Care Reforms set out a new vision for the leadership and delivery of health and care services. A key element of the reforms is the establishment of a Local Health and Wellbeing board that brings together local government, health and local communities to work together effectively to improve services and population health and wellbeing. The board will be responsible for the delivery of a local Joint Health and Wellbeing Strategy (JHWS) which will use the Marmot Review 'Fair Society, Healthy Lives' as a framework for tackling health inequalities. The Marmot review provides evidence on the links between the provision of more affordable housing and improved access to appropriate education and employment opportunities as important determinants of health outcomes across the life course. The JHWS will be published later this year. We would recommend this is explicitly mentioned in the Policy Context sections of the development proposals to ensure formal links are in place.

City Plan Part 1 response - The Department of Health has recognised the importance of delivering care closer to home and NHS Gloucestershire has been investing in primary healthcare facilities to ensure that people can access services close to home and to minimise waiting times. Delivering care in peoples own homes is equally important and the new role of telehealth will help people to self-manage some conditions. The new housing provision in Gloucester should provide for people's needs as they get older, to support independent living, for example through consideration of Lifetime Homes design criteria. The anticipated increases in the number of people in Gloucester will have implications for the demand for acute specialist services – particularly as the population ages, or, in the case of maternity services if the birth rate increases. Whilst we envisage that the overall number of beds on our sites may decrease over time, the two District General Hospitals will both continue to remain a key element of the existing NHS infrastructure. Our shared challenge will be to ensure that once patients no longer require the specialist input of the two District General Hospitals, that there are sufficient and appropriate facilities within the local communities themselves to enable people to return swiftly to their home areas. The layout of towns and cities and how we move around them has a significant impact on physical activity levels. The practicalities of planning the infrastructure to derive the best physical activity benefits is documented in the Active Planning Toolkit that was produced by a multi-agency partnership in Gloucestershire and can be found at <http://www.glospct.nhs.uk/pdf/publications/2011/ActivePlanningToolkit.pdf>. Access to good quality public open space has been shown to have positive impacts on mental and physical health and can help to reduce health inequalities. The commitment to protecting and improving the City's leisure, recreation and environmental assets is welcomed. Opportunities for leisure based activities should be promoted including walking, cycling and opportunities for outdoor play. These actions should help to tackle two of the greatest PH challenges for the City, namely obesity levels and mental health and wellbeing. It should be remembered that play does not need to take place at a 'playground' and the redevelopments should seek opportunities for natural play, for example the use of trees and the use of colour in the developments. The design and layout of neighbourhoods can provide natural surveillance over public space that can reduce both the fear and incidence of crime. The inclusion of community safety as a fundamental principle in the developments is welcomed and should include the provision of effective lighting to reduce opportunities for anti social behaviour and criminal activity. The planned developments provide an opportunity to contribute to the development of sustainable healthy communities in Gloucestershire. We therefore feel strongly that a policy for sustainable and healthy communities should be one of the essential policies developed within the developments. We enclose with this letter an outline of what such a policy could encompass. A lack of housing creates a complex range of health needs that all of the public sector agencies work hard to tackle. It is important for the delivery of a wide range of public services that key workers have access to affordable housing. It is also important that those homes built are designed to accommodate the key population groups and this means that we need to ensure that homes accommodate an increasingly older population. In line with the population demographics noted in the documents, housing is important to prevent younger people leaving the city in search of employment and thus affordable housing that allows younger people to remain in the county is also supported. It should be noted that there are alternative ways to increase housing provision without building new properties for example bringing vacant properties back to use and schemes such as Living Over The Shop (LOTS). One of the challenges identified in the City Plan consultation document is a need to regenerate the more deprived areas of the City to bring forward improved housing, access to jobs, services and open space. In addition to geographical pockets of deprivation, the plans also need to consider individuals and groups who may experience poorer health outcomes and barriers to accessing services and opportunities. The Annual Report of the Director of Public

A background Topic Paper on Health and Wellbeing has been produced to ensure that the City Plan takes account of all of the identified health and wellbeing issues facing the city.

<p>Health 2010-11 sets out examples of the types of groups which will need to be considered to ensure that any existing barriers to accessing services can be overcome. <a href="http://www.nhsglos.nhs.uk/your-local-nhs/about-nhs-gloucestershire/corporate-publications-and-strategies/director-of-public-health-annual-reports/">http://www.nhsglos.nhs.uk/your-local-nhs/about-nhs-gloucestershire/corporate-publications-and-strategies/director-of-public-health-annual-reports/</a></p> <p>The strategy to deploy housing growth to the northern periphery of the City's boundary in well integrated and connected areas has value. However, the document recognises that some communities in the south of the City Centre feel isolated and unconnected and any regeneration must ensure that these areas are not left behind. We must ensure that transport infrastructure and services are improved for all the City's residents and in line with the housing growth. We are aware that the detail around the exact location of the future developments is being further developed at present and we welcome the opportunity to be actively engaged and to shape the next stage of the plans. In order to support the anticipated growth in the population expected to be generated by the new housing developments included in these proposals and the Joint Core Strategy, due provision will need to be made to enhance, explore and expand primary and social care facilities related to such expansion proposals. Detailed healthcare related studies will be needed to assess the precise level of demand for services and the timing requirements of these services in conjunction with growth. The outcome of these studies will help to identify the specific need for land/properties in which we can provide these public healthcare services and will also help to establish the cost of providing such services. There will therefore be a need for both capital and revenue contributions arising from the provision of such health and social care services, which will need to be factored into the financial appraisals relating to the overall costs associated with the expansion proposals. NHS Gloucestershire welcomes the inclusion of leisure, food and drink establishments in both the proposed policy frameworks. It should be noted that these developments have a role to play in the provision of affordable local healthy food e.g. through local shops and grow your own schemes such as allotments. The provision of fast food outlets in near proximity to schools should be avoided and instead there should be access to healthy food options. The evidence base demonstrates the need to provide access to employment; social, cultural and leisure activities; goods and services and transport as key socio-economic determinants of health. We welcome the further engagement of Gloucestershire's Public Health Team, healthcare providers and commissioners during future stages of the developments.</p>	
<p>The statement that the Southern part of Gloucester suffers "isolation and lack of connection", and is "not sustainable" is of concern, as is the statement that there has been "artificial distortion with growth along the A38 to south". The fairly recent development of substantial areas of City at Hardwicke, Waterwells Business Park and Quedgeley, including the Kingway Development, have been supported and approved City Council, and these areas are very much part of Gloucester City and should be treated as such. The statement that Gloucester has a "significant number of development sites" is questionable, particularly in terms of the existing tightly constrained administrative boundary and the likelihood or not of any particular site being delivered. The statement that an additional 6,500 houses are required within the City boundary to 2031 in notes, but it is also noted that this assumes large numbers of houses to satisfy City needs are to be located beyond the boundary. In summary, the Strategy based on these particular statements needs reconsideration. There is land within the City boundary at Naas Lane which could be allocated for housing to assist in satisfying these needs. However, if the City Council remain of the view that land to the east Waterwells Business Park, including my Clients Land, is to be allocated for employment development, two general requirements to encourage the delivery of this development should be incorporated. However, if the City Council remains of the view that land to the east of Waterwells Business Park, including my Clients land, is to be allocated for employment development, two general requirements to encourage the delivery of this development should be incorporated. Firstly, the full range of employment uses (B1, B2 and B8) would need to be specified. Secondly, in order to address the high costs of infrastructure to serve this particular land, particularly at a time when development of employment land is not a market priority would need to be addressed by including an element of enabling residential development in the allocation of the land.</p>	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also needs to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
<p>We support the recognition that there is a need to accommodate a growing population and that 60% of this predicted growth will be from people within the working age range. There is a clear demonstrated need for affordable housing units within the city and it will be important that the right type of dwellings are planned. We could encourage the Council to consider the latest evidence base in line with guidance contained in the NPPF and to ensure that policies are based on identified needs. We are encouraged by the emphasis and recognition that it is 'vitally important' to provide new affordable housing to meet the needs of the city. We support the council in their efforts to try to plan for more affordable dwellings and would like to ensure that this policy remains a priority throughout the plan period. We would also like to point out that affordable housing should not only provide for single and young people but that there are many families and older people in housing need in Gloucester and their needs should be considered thorough policy. The Gloucestershire Strategic Housing</p>	<p>Noted.</p> <p>The City Plan will accord with the NPPF.</p> <p>Affordable homes and homes for older people will be addressed through the policies of the JCS and the City Plan.</p>

<p>Market Assessment (SHMA) indicated that house prices in Gloucestershire have been above average since 1996 and between 1996 and 2004 Gloucester (and Stroud) recorded the highest growth rates for entry level home. We therefore support the emphasis on affordable housing within the City Plan.</p> <p>Older People - We consider that the Council should produce a policy and strategic objective to meet the needs of older people. The NPPF requires local authorities to assess the needs of inter alia older people and to meet those needs where possible. There is a lack of recognition within the draft City Plan in particular of the special needs which are associated with providing care and accommodation for the ageing population within Gloucester. Page 7 of the City Plan state that Gloucester is expected to experience a growth in the number of people aged 65 and over, which will reflect national trends. The SHMA further indicates that innovative accommodation types may be required in the future to meet their need and extra care is mentioned on page 161 of the SHMA. We would like to encourage the Council to include a policy which addresses the full spectrum of housing care options including Continuing Care Retirement Communities (CCRC), care homes, extra care and sheltered housing.</p> <p>Key Development Principle 5 - We support this development principle and the need to plan for growth in the city with a balance of housing types to meet a diverse range of people. However, we consider that the figure of 325 new dwellings per annum is too low, it also prejudices the outcomes of this consultation process. A range of figures should have been provided and consulted upon before a final figure is produced. The household projections included on page 8 of the City Plan indicates that the population of the city will grow by 1,383 households per year. Clearly, some of this need will be met by existing housing but we consider to plan for only 325 new dwellings per year will not keep pace with the household projections.</p>	<p>The housing need for Gloucester will be set through the JCS process. Gloucester will be relying on neighbouring authorities to meet its housing need requirements.</p>
<p>Natural England broadly supports the City Centre first approach and we agree that steering development away from green field sites should make best use of land, minimise the need to travel and provide opportunities to enhance the City for new and existing communities. However future policy guidance will be needed to recognise and protect the potential ecological interest of some brown field sites. We are particularly pleased to note that the proposed Development Principles include the need for development to contribute to climate change mitigation and adaptation, maximise protection for and enhancement of important environmental and heritage assets and contribute to a connected City that people can enjoy and be proud of.</p> <p>Green Infrastructure (GI) - Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, river and wetlands'. (Natural Environment White Paper) Natural England appreciates that to some extent the principles of green infrastructure are conveyed in the City Plan and Concept Statement; however we believe GI should be strategically planned at all spatial scales and designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. We therefore strongly recommend that GI is incorporated into the next stages of the City Plan. The City Plan presents an opportunity to identify a strategic GI framework for Gloucester that reflects and responds to the built and natural environment, recognises and supports ecosystem services and contributes positively to the wider green network. This should inform the next stages of the City Plan preparation and provide guidance to lower tier plans, including Kings Quarter Concept Statement and to individual developments, which would help to ensure a coordinated and consistent approach is taken to GI provision and management, both within and beyond the City boundary. This approach would better reflect the multi-functional and cross cutting nature of GI planning and provision and would also accord with National Planning Policy Statement (NPPS) guidance that local planning authorities should set out a strategic approach in the Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>NPPF also identifies a need to plan for biodiversity at a landscape scale across administrative boundaries, requiring local authorities to:-</p> <ul style="list-style-type: none"> <li>• identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation</li> <li>• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets; and identify suitable indicators for monitoring biodiversity in the plan</li> <li>• aim to prevent harm to geological conservation interests; and</li> </ul>	<p>Noted.</p> <p>The Green Infrastructure evidence base collated for the JCS, and the policies contained within the JCS, have been used to inform locally specific policies with regard to GI, biodiversity and the wider natural environment.</p> <p>A Habitat Regulations Assessment was completed in Autumn 2016 for the emerging City Plan.</p> <p>Nature Improvement Areas and key open spaces have been plotted on the draft policy map.</p>

<p>• where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas</p> <p>There is considerable existing evidence and guidance available to the Council that is likely to be relevant to green infrastructure planning, including the Gloucestershire Nature Map developed by the Gloucestershire Biodiversity Partnership, the Rights of Way Improvement Plan, town/landscape assessments, and Historic Environment Records. Natural England would be pleased to provide further information on designated sites and landscapes if this is not already available to the Council.</p> <p>Habitats Regulations Assessment (HRA) - The Joint Core Strategy HRA Screening Report concluded that it is not possible, at this stage, to rule out likely significant effects on the integrity of certain European sites, either alone or in combination. Uncertainties remain about water quantity and quality, air pollution and recreational pressure. The likelihood of significant effects increases with the amount of development and with proximity to European sites. A need has been identified for urban extensions on the edge of Gloucester to meet estimated housing requirements. In our response to the recent Joint Core Strategy consultation, Natural England raised concerns that the evaluation of the Gloucester sites had not given due consideration to the proximity of the Cotswold Commons &amp; Beechwoods SAC. Lower tier plans and projects are also subject to the Habitats Regulations and the Council, as Competent Authority, is required to assess the likely effects of implementing the City Plan on European protected sites, both alone and in-combination. The process of screening the Plan for Likely Significant Effect (LSE) should be consistent with the approach being undertaken for the Joint Core Strategy HRA.</p> <p>Counteracting policies and measures will be an important consideration when assessing the likely effects of the City Plan on protected sites. The provision of well planned and managed green infrastructure would make an important contribution to mitigating the effects of growth and development on European designated sites. For example improving air quality by reducing the need to travel by private car through the provision of enhanced walking and cycling opportunities and off-setting recreational impacts by providing alternative green space and recreational opportunities. However these measures are more likely to be effective if they genuinely meet people's needs and are meaningfully coordinated across administrative boundaries.</p> <p>National Planning Policy Framework (NPPF) - The NPPF has been published during the consultation period. Natural England has not specifically considered the City Plan Part 1 or Kings Quarter Concept Statement with respect to the NPPF. We would expect the Council to consider compliance, but would be pleased to comment further on this in due course.</p>	
<p>NPPF section 50 encourages self-build. With a view to setting and meeting targets to meet needs of this particular market, Local Planning Authorities will need to have a clearer understanding of what the market requires, so that their plan is robust and suitably evidence based.</p>	Noted.
<p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>The new Sport England Strategy 2012-17 sets a challenge to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> See more people taking on and keeping a sporting habit for life</li> <li><input type="checkbox"/> Create more opportunities for young people</li> <li><input type="checkbox"/> Nurture and develop talent</li> <li><input type="checkbox"/> Provide the right facilities in the right places</li> <li><input type="checkbox"/> Support local authorities and unlock local funding</li> <li><input type="checkbox"/> Ensure real opportunities for communities</li> </ul> <p>Sport England has considered the City Plan (Part 1) to 2031 in the light of Sport England's 'Planning for Sport &amp; Active Recreation: Objectives &amp; Opportunities' (Interim Statement 2005). The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport</p>	<p>Noted.</p> <p>A number of policies have been designed to protect and enhance sports, playing fields and public open space.</p> <p>The Sport England's exception tests have been used in the development of the relevant policies.</p> <p>In addition to this a policy on Active Design has also been included.</p>

is necessary in order to ensure the sport and recreational needs of local communities are met.

1. Local Plan & CIL Evidence Base - The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, para 73 of the NPPF requires that: "Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area."

This includes a wide range of sport and recreation facilities including playing pitches, courts, swimming pools, sports halls, etc. It stresses that to ensure effective planning for open space, sport & recreation it is essential that the needs of local communities are known. Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sport and recreation. Assessments will normally be undertaken at district level, although assessments of strategic facilities should be undertaken at regional or sub-regional levels. Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development. We note that The Council is currently working towards a more detailed review of playing pitches.

2. Planning Obligations/Community Infrastructure Levy to Sport - Sport England supports use of planning obligations/community infrastructure levy 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 sport and recreation evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts. All new dwellings in Gloucester in the local plan period 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.

Planning, leisure and sports officers should:

- Assess existing information on the need and demand for sport and recreation provision in terms of how it will assist in creating a CIL charging schedule
- Look at the potential for adapting any existing standard charge approaches to sport, currently used for section 106 agreements, into CIL charges
- Ensure liaison between sport and planning officers results in built sports facilities, as well as outdoor facilities such as playing fields, being included in CIL charging schedules
- Consider how lists of appropriate projects, in areas affected by development, can be established and prioritised for implementation

For information regarding planning obligations for sport:

[http://www.sportengland.org/facilities\\_\\_planning/planning\\_tools\\_and\\_guidance/planning\\_contributions.aspx](http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx)

For more information re: sport and CIL: [http://www.sportengland.org/facilities\\_\\_planning/planning\\_tools\\_and\\_guidance/planning\\_contributions\\_-\\_what/community\\_infrastructure\\_levy.aspx](http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions_-_what/community_infrastructure_levy.aspx)

3. Active Design - Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy. Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via [www.sportengland.org](http://www.sportengland.org). 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. Sport England would encourage the developers to design future proposals in Gloucester in line with the Active Design principles.

4. Community Use of Educational Sites - Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

PLANNING POLICY OBJECTIVE 9: To promote the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations. Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

5. Protecting Facilities & Playing Fields - Our Planning for Sport & Active Recreation: Objectives & Opportunities (Interim Statement 2005) has relevant objectives that may be of use to you:

PLANNING POLICY OBJECTIVE 2: To prevent the loss of facilities or access to natural resources which are important in terms of sports development. Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location. For playing fields Sport England will promote policies and practices that:

- make use of playing pitch assessments and strategies to identify the adequacy of existing provision to meet community needs for pitch sports;
- encourage greater community access to playing fields currently under private or educational ownership;
- encourage improvements to the overall quality of playing fields, e.g. through improved drainage or the provision of changing facilities;
- ensure that adequate funds are secured for maintenance where new or enhanced playing fields are provided in relation to new development; and
- clearly indicate the role of S106 agreements in helping to achieve the above policies.

PLANNING POLICY OBJECTIVE 5: To promote detailed local assessments of playing field requirements using the methodology as outlined in 'Towards a Level Playing Field'.

PLANNING POLICY OBJECTIVE 6: To ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England would consider any future planning application in the light of its playing fields policy [http://www.sportengland.org/facilities\\_\\_planning/putting\\_policy\\_into\\_practice/playing\\_fields.aspx](http://www.sportengland.org/facilities__planning/putting_policy_into_practice/playing_fields.aspx) . The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met.

The Policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the

<p>judgement of Sport England, one of the specific circumstances applies.”</p> <p>Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met:</p> <p>E1 - “A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.”</p> <p>E2 - “The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.”</p> <p>E3 - “The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.”</p> <p>E4 - “The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”</p> <p>E5 - “The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.”</p> <p>Playing fields, sports buildings and facilities have been given greater protection and recognition by the Government through the recently published National Planning Policy Framework which states (paragraph 74):</p> <p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus of requirements; or</li> <li><input type="checkbox"/> The loss resulting from the proposed development would be replaced by equivalent or better provision in term of quantity and quality in a suitable location; or</li> <li><input type="checkbox"/> The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> <p>To counter this, a key element of the City Plan must be to promote a mixed housing strategy which offers greater certainty over delivery and the ability to plan for the full range of market and affordable housing needs on which the community depends. The need to provide larger dwellings at Gloucester was a key conclusion of the Gloucestershire Strategic Housing Market Assessment (Figure 14.11 refers) and is identified as a key issue in the Consultation Document.</p>	
<p>We generally support the Vision for Gloucester set out on page 1 of the Consultation Document. It 3.2is right that the City Plan fosters economic growth. However, the Vision does not acknowledge other key challenges facing the City, such as providing sufficient homes to support an expanding population and the need to identify suitable development sites in deliverable and sustainable locations. Accordingly this part of the Vision should be recast as follows: “We will work to encourage sustainable economic growth for the city’s expanding population by driving forward its regeneration programme and providing a sufficient quantum of housing and employment opportunities in suitable and sustainable locations.” The need to provide sufficient homes to support the growing population is rightly identified as a Key 3.3Challenge as well as a Key Development Principle. This document should go further to meet the</p>	<p>Noted.</p> <p>The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of</p>



requirements of para 47 of the NPPF – significantly higher than the 6,500 dwellings This is particularly important given the strategic planning status afforded to Gloucester in the emerging Joint Core Strategy which is also reiterated in the Consultation Document. Whilst the overall level of housing for Gloucester City will be determined through the Joint Core Strategy process, it is important that the City meets objectively assessed levels of housing need and demand as required by para. 47 of the NPPF. In representations to the Joint Core Strategy Consultation in February 2012, the Trustees outlined their support for housing scenario D (40,500 dwellings for the Joint Core Strategy area). Moreover, evidence presented within the Part 1 Consultation would suggest that the level of household change will be some 16,600 dwellings by 2031. Once the strategic planning role afforded to Gloucester is taken into consideration this would be expected to increase further and would suggest the need for a significantly higher quantum of development than the 6,500 dwellings referred to in the Consultation Document. It will also be important for the City Plan to facilitate the development of a range and choice of 3.4housing – a key requirement of the NPPF (para. 47 refers). Hitherto, regeneration efforts have, so far as housing has been concerned, inevitably focused on high density schemes, which have typically been characterised by flatted development. This has narrowed the range and choice of housing and cannot be the sole focus for housing provision going forward. To counter this, a key element of the City Plan must be to promote a mixed housing strategy which 3.5offers greater certainty over delivery and the ability to plan for the full range of market and affordable housing needs on which the community depends. The need to provide larger dwellings at Gloucester was a key conclusion of the Gloucestershire Strategic Housing Market Assessment (Figure 14.11 refers) and is identified as a key issue in the Consultation Document. In order to satisfy the need and demand for housing and to achieve a more ‘balanced’ housing 3.6market, a portfolio of sites suitable for higher and low/medium density development will be required. This will inevitably involve not only previously developed land, but also greenfield land. We comment further on the most appropriate distribution of growth for Gloucester City in the following Section. In accordance with the NPPF, it is important that the location of new development will depend on a 3.7balance of considerations between economic, social and environmental impacts. Whilst it is therefore appropriate for the City Plan to provide sufficient protection of environmentally sensitive locations, there is a concern that in the case of some sites, such as Land at Corncroft Lane, Matson, too great an emphasis has been placed on the impact on landscape, particularly when the evidence presented to date does not support this view.

Distribution of Development within Gloucester City - The Consultation Document identifies that growth up to 2031 is “best directed” to the north of the 4.7City. Such a statement prejudices the outcome of the Joint Core Strategy process, which itself has only reached the development of the Preferred Option Stage (Regulation 25). The proposed distribution of growth outlined in both the City Plan and the Joint Core Strategy would 4.8see the identification of a significant quantum of strategic development within one location, to the north of Gloucester. It is the deliverability and identification of such a distribution of growth which most concerns the Trustees, particularly so early within the process and absent the evidence to demonstrate it is the appropriate strategy.

In its current form the Joint Core Strategy would see the development of some 5,350 dwellings 4.9developed on strategic development sites to the north of Gloucester. If a higher housing requirement were pursued, the quantum of development to the north of Gloucester could be increased further through the identification of broad locations. The deliverability of this quantum of development must be questioned. It would represent a 4.10significantly higher rate of development than delivered at both south west Gloucester and at RAF Quedgeley. To ensure the deliverability of both the Joint Core Strategy and the City Plan it is therefore 4.11necessary to re-examine the most appropriate strategy for accommodating development at Gloucester. This affords a very obvious role for smaller sites within the City’s administrative area to provide development land throughout the plan period. Where this involves no conflict with properly identified constraints, it represents a valuable source of housing potential. Such sites generally have additional merits – often they will be more straightforward to implement; 4.12they can contribute to the mix and range of housing opportunities consistent with Government Policy; are not located within the Gloucestershire Green Belt and they are in equally or more sustainable locations than the strategic urban extension sites. Thus they will add flexibility and should be properly reflected in emerging Development Plan policy. It is in this regard that land at Corncroft Lane, Matson provides an eminently suitable location. The 4.13NPPF emphasises that Green Belt release should only be contemplated in exceptional circumstances. The availability of alternative non Green Belt sites at Gloucester should represent a priority location for the City’s future development. Information regarding the suitability of this site is provided in the following Section. In addition to the above, the Trustees are also concerned that alternative distributions of growth 4.14have not been assessed through a robust Sustainability Appraisal. Absent this evidence there can be no certainty that the strategy outlined in the Consultation Document is the most appropriate strategy when compared against reasonable alternatives, which is a requirement of the NPPF (para. 182 refers) In the submission of the Trustees, the Gloucester City Plan must have regard to the following: 6.1 The City Vision is focused too narrowly on regeneration initiatives and does not acknowledge the other key challenges identified in Part 1 of the City Plan; There is a need for the City Plan to provide an appropriate

development.

The Objectively Assessed Need has been determined through the JCS process.

A choice of housing will be provided to meet the need as outlined in the latest housing needs evidence base.

Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector) as the capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.

framework for the distribution of a level of housing akin to objectively assessed development requirements; There is a need to provide a range of housing types and tenures; The City Plan must provide a careful balance between environmental and other objectives. At present there is a concern that it will place too great an emphasis on untested and non-statutory environmental constraints when considering the suitability of sites to accommodate development;

It is appropriate that the City Plan identifies Gloucester as a focus for growth within the County; The development of non-Green Belt land should be afforded a priority over development in Green Belt locations; The spatial strategy for Gloucester City places too much strategic development in one location (North Gloucester). To ensure the Vision is delivered, the strategy should recognise the obvious benefits associated with the development of smaller sites, such as Land at Corncroft Lane, Matson; and Land in the control of the Trustees at Corncroft Lane, Matson should be recognised as suitable to contribute to the necessary mixed housing strategy for the City. It is being promoted to deliver between 150-200 dwellings.



# **GLOUCESTER CITY PLAN**

## **SUSTAINABILITY (INTEGRATED) APPRAISAL**

**(Sustainability Appraisal, Strategic  
Environmental Assessment, Health Impact  
Assessment, Equalities Impact  
Assessment)**

### **NON-TECHNICAL SUMMARY**

**OCTOBER 2016**

# Gloucester City Council Gloucester City Plan: Draft

## SUSTAINABILITY (INTEGRATED) APPRAISAL (SA): Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equalities Impact Assessment (EqIA)

### **DRAFT** Sustainability Appraisal Report NON-TECHNICAL SUMMARY

October 2016

enfusion

environmental planning and management for sustainability



Treenwood House  
Rowden Lane  
Bradford-on-Avon  
BA15 2AU  
T: 01225 867112  
[www.enfusion.co.uk](http://www.enfusion.co.uk)

## Non-Technical Summary (NTS)

### **This is the NTS of the Sustainability Report**

1. This is the Non-Technical Summary of the Sustainability (Integrated) Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal for the Draft Gloucester City Plan (GCP). This summary is an integral part of the Sustainability (Integrated) Appraisal Report that accompanies the Draft GCP for public consultation in January 2017. It provides an outline of the SA process and findings, including how the SA has influenced the development of the Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Gloucester City Plan (GCP)**

2. Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) which sets out a strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, which includes strategic direction for development growth and strategic policies. The Gloucester City Plan (GCP) covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
3. The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore is in the process of identifying strategic allocations / urban extensions around Gloucester to meet the residual need.
4. The GCP will identify the sites to deliver the 7,685 new dwellings. Two of these sites (Land at Winneycroft Lane / Corncroft Lane) are included within the GCT JCS given the strategic scale of development at these sites. As such, these sites have been appraised within the GCT JCS Sustainability Appraisal Addendum Report (2016), and it is not considered necessary to duplicate an assessment of these sites within this SA Report. The GCP, alongside the GCT JCS, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
5. The Draft GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability (Integrated) Appraisal, and consultation with the public, stakeholders and the regulators. The Draft GCP sets out the key challenges for the GCP area with a

proposed Vision for the development until 2031 and suggests Principles to address key issues and to help deliver the Vision.

6. The Draft GCP comprises of proposed Policies and site allocations, and alongside the GCT JCS, will guide the planning and management of growth and development in the Gloucester City area to accommodate the necessary new housing and jobs whilst protecting important and valued environmental assets such as biodiversity and historic heritage. The Draft GCP invites comments on the proposed site allocations, a call for new sites, and planning policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making.

### **Integrated Appraisal: SA, SEA, EqIA and HRA**

7. The purpose of Sustainability (Integrated) Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
8. Gloucester City Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in June 2016. For the SA of the GCP, an integrated process has been undertaken that also addresses health and equality issues alongside the requirements of the Habitats Assessment Regulations (HRA) (HRA Report available separately). The findings of the health and habitats assessments have been integrated into the SA. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the GCT Joint Core Strategy.
9. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope, the SA is prepared and includes an SA Framework of objectives for sustainable development in the Gloucester City area, and which forms the basis against which the Draft GCP is assessed.

### **Sustainability characteristics of the Gloucester City area**

10. Gloucester City is characterised by its strong historic heritage, and dockland areas which have been the subject of ongoing regeneration. Much of the central area of Gloucester City forms part of the historic setting, containing many Listed Buildings, Scheduled Monuments and Conservation Areas. The

central area is also a designated Area of Archaeological Potential. The City is well connected in terms of road, rail and freight movements, and also with national cycle network connections and promoted walking routes. The City also contains over 500ha of open space and two designated Sites of Special Scientific Interest (SSSIs).

11. The majority of housing in Gloucester is semi-detached, and property prices in Gloucester are significantly lower than those in the surrounding local authority areas of Tewkesbury, Cheltenham, Stroud, Cotswold and Forest of Dean. A high percentage of the people of Gloucester City are economically active and the City also experiences a high number of in-commuters. A number of health indicators are identified as worse than the average for England in Gloucester, and these include levels of adult and child obesity, and levels of adult physical activity. The City is also constrained by flood risk, particularly fluvial flood risk as the River Severn channel becomes narrower, and the raising of flood defences, particularly around Westgate, is considered to deliver the most benefit is combating this risk. Without the Gloucester City Plan to guide new development, pressures on important townscape, heritage and biodiversity assets may cause adverse effects. The GCP can also maximise the potential benefits arising from new development, with opportunities for sustainable, well connected development that contributes to improving the experience of the City and the health and wellbeing of its residents, employees and visitors.

### Key Sustainability Issues, Problems and Opportunities

12. The key sustainability issues and opportunities are summarised in the table below:

Key Sustainability Issues and Opportunities
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.
A large proportion of the City falls within the River Severn floodplain.
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings.
Certain areas of the City suffer from traffic congestion and poor air quality.
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces are accessible to all.
There are areas of the City that experience high unemployment rates.
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry.
High levels of in-commuting.
Limited early hours / evening economy.
Need to plan for and protect quality employment land and ensure a future

supply.
There are older, less attractive employment areas.
Lack of overnight tourist visitors.
Poor retail provision compared to the size of Gloucester's shopper population.
There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station.
There is acute housing 'need' in the City.
'Pockets' of acute deprivation exist in some parts of the City.
There is a significant growth in the population predicted, particularly in the young and working age bands.
Growth in the number of households, in particular single person households.
Educational achievement needs improving.
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment rates.
There is a national requirement to minimise waste production and the amount of waste sent to landfill.
There is a requirement to maintain and improve the ecological status of the River Basin.

### How has the GCP been assessed?

13. An SA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including SA Objectives that aim to resolve the issues and problems identified for development planning in the GCP area. This SA Framework, together with the baseline information and PP Review has been updated in this SA Report, and comprises the basis for assessment. The updated SA Framework can be found in Table 2.1 of the main SA Report, and a summary of the updated key issues and SA Objectives is presented in Appendix II of the main SA Report.
14. Each developing element of the Draft GCP, including potential site allocations and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging Draft GCP were assessed. The SA considered positive, negative and cumulative effects according to categories of significance as set out in the following table:

Categories of Significance for SA		
Symbol	Meaning	Sustainability Effect
--	Major	Problematical and improbable because of known sustainability



	Negative	issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

15. Sustainability (Integrated) Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

#### **What reasonable alternatives have been considered and addressed?**

16. Through the development of the Draft GCP, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed the plan-making. Potential reasonable options for site allocations were assessed individually and with consideration of cumulative effects in settlement areas where possible. This Draft GCP invites comments on the proposed site allocations, a call for sites, and development management policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making. The findings of the SA informed this selection but is not the sole source of information to inform decision-making as part of the plan preparation.
17. The Sustainability (Integrated) Appraisal considered cumulative effects and the inter-relationships between sustainability topics for each site option where possible, and made comments with regard to any significant effects, where possible.

#### **What are the likely significant effects of the Draft GCP?**

18. Overall, the implementation of the policies presented in the Draft GCP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are as follows:

- Major long term and cumulative positive effects through meeting the housing needs of the GCP area - will also support economic objectives; good quality housing will have major direct cumulative positive effects on health
  - Ensuring that community facilities and other supporting infrastructure will be provided with both short and long term positive effects
  - Support for the economy and employment – will also have further positive effects for health and wellbeing; the vitality of the city and town centres
  - Long term protection against flood risk from all sources
  - Landscape, biodiversity and historic assets are protected.
  - Significant cumulative positive effects as a result of regeneration, which is heritage led providing a sense of identity and distinctiveness, delivering mixed-use development within the identified housing / regeneration zones.
19. Alongside the positive effects, some minor negative effects were also identified, largely as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development in the plan area. The key potential negative effects are summarised as follows:
- Noise, air quality reduction, pollution, and congestion, arising from the overall predicted growth in road based traffic
  - Effects on landscape and indirect effects for biodiversity, where local level habitats and linkages disturbed or removed – cumulative in the longer term

### **How could negative effects be mitigated?**

20. A key function of the SA and overall Sustainability (Integrated) Appraisal process is to provide advice and recommendations to the development of the plan in order to mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the next stage of the plan making process. The SA includes recommendations to support the plan development stages.
21. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable and connected communities through requirements for appropriate provision of supporting infrastructure, such as community centres and transport. This is supported by policies within the higher-level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. A strong feature of the JCS is the commitment to Green Infrastructure, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational spaces for people. Potential negative effects on local biodiversity in the Draft GCP will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible. The SA Recommendations and Suggestions include:

Recommendation(s):

- Enhanced support for the strategic connectivity of open recreational spaces, in line with the Open Space Strategy.
- Enhanced policy wording that seeks qualitative improvements to existing open spaces, where quantitative contributions are not required
- Clarification around acceptable approaches to preventing Gull roosting, nesting and damage, and the prioritisation of non-lethal solutions

Suggestions:

- Encouragement for early Phase 1 Habitats Surveys on brownfield sites

**EqIA**

22. The screening assessment has found that the Draft GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

**Consultation**

23. The Draft GCP and its accompanying SA documents are provided for consultation through the Council's website. Comments made and responses to them will be recorded and made available. Thus consultation is a vital ongoing and iterative element of the plan-making and SA processes. The Draft GCP and accompanying SA Report reflect the findings of various technical studies and responses received so far during consultation.
24. The Draft GCP and this accompanying Sustainability Appraisal Report will be available for consultation for a period of approximately 6 weeks beginning in January 2017.

**Monitoring Proposals**

25. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
26. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Gloucester City Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place going forward.

**This page is intentionally left blank**

## **Draft City Plan Consultation Plan**

### **The Regulations**

The Draft City Plan is being consulted under Regulation 18 of the Town and Country Planning (Local Development) England Regulations 2012. The regulation that requires that in the preparation of a Local Plan (and in advance of its submission to the Planning Inspectorate for examination) local planning authorities notify and invite comments from a range of different people and organisations. The regulation requires the authority to consult certain specific consultees, such as neighbouring local authorities, the Environment Agency and Natural England. It also provides flexibility for the authority to invite any other person or organization that they believe would have an interest in the plan.

The approach set out in this Consultation Plan also satisfies the requirements of the City Council with regard to other relevant Regulations, for example relating to the availability of consultation documents.

### **Statement of Community Involvement**

The City Council's 'Statement of Community Involvement' was adopted in 2015 and sets out when and how the Council will consult in the preparation of its Local Plan, supplementary planning documents and major development management planning applications. This document has been taken into account in drawing up this consultation plan.

### **Consultation dates**

Subject to timely completion of the Joint Core Strategy (JCS) 'Main Modifications' consultation, it is intended the Draft City Plan will be published for a six week period of public consultation between **Monday 16<sup>th</sup> January and Monday 27<sup>th</sup> February 2017**.

## **Consultation Plan**

### ***Letting people know***

- Email / hard copy letters to all members of the community, organisations and stakeholders on the planning consultation database<sup>1</sup>.
- Emails to all relevant consultees on the City Council's consultation database<sup>2</sup>.
- Press advert
- Press release (working proactively with press team)
- City Life magazine article
- Linked from the City Council website homepage.
- Social media notifications<sup>3</sup>
- Quedgeley Parish Council article
- Member newsletters

### ***Access to consultation documents***

---

<sup>1</sup> This will need to be accompanied with a review of the database to make sure it has the right representation and correct contact details. Also to download from the JCS database all consultees who also asked to be added to the GCC database.

<sup>2</sup> Will require liaison with Wendy Jones in advance.

<sup>3</sup> At the start of the consultation, half way through and a week before it closes.

- Publication on the City Council's website, both on the homepage and the City Plan homepage – [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)
- Hard copies of all consultation documents, supporting information and response forms made available at all 'deposit locations' – the City Council offices (including a permanent exhibition), all local libraries, the Guildhall and Tourist Information Centre.
- Printed hard copied available upon request (subject to small fee)

### ***Going into the community***

- Public exhibitions – four in total, one on the City Centre and up to four others strategically located across the City, using the 'Hello Gloucester' minibus and/or appropriate community venues.
- Exhibition / workshop for City Council, County Council staff and Members.
- Targeted engagement with the community, for example presentations and discussions with:
  - School(s);
  - Older persons housing (e.g. St Oswald's retirement village);
  - Younger people (e.g. Young Gloucestershire)
- Add to the agenda of relevant City Council committees or forums, e.g. Environment and Ecology Forum, Business Forum.

### ***Ways of responding***

- Set out specific consultation questions to frame responses, including the 'call for sites'. Other methods available but strongly encourage people to respond to the questions.
- Responses can be made in a variety of ways:
  - Online via the City Council's bespoke planning consultation system;
  - Email to [spatialplanning@gloucester.gov.uk](mailto:spatialplanning@gloucester.gov.uk)
  - Responding at one of the consultation events
  - Writing to the Planning Policy and Heritage Team, Gloucester City Council, Herbert Warehouse, The Docks, Gloucester, GL1 2EQ.

### **Business support**

#### October

- Updating / amending I-Novem consultation database

#### Mid-November to consultation launch

- Email / letter notifications
- I-Novem structured document
- I-Novem questionnaire
- Deposit location packs (inc. printing as needed)
- Press notice
- Add people to database responding to City Life

#### During consultation

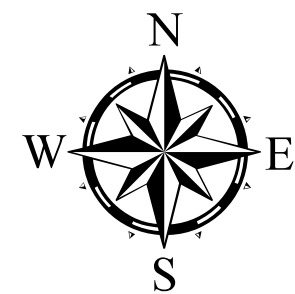
- Processing responses (with planner support)

#### Post consultation

- Processing responses (with planner support)
- Deadline to have all responses on the I-Novem system – 13<sup>th</sup> March

# DRAFT Central Gloucester City Plan Map

















**Gloucester  
City Council**  
Transforming Your City

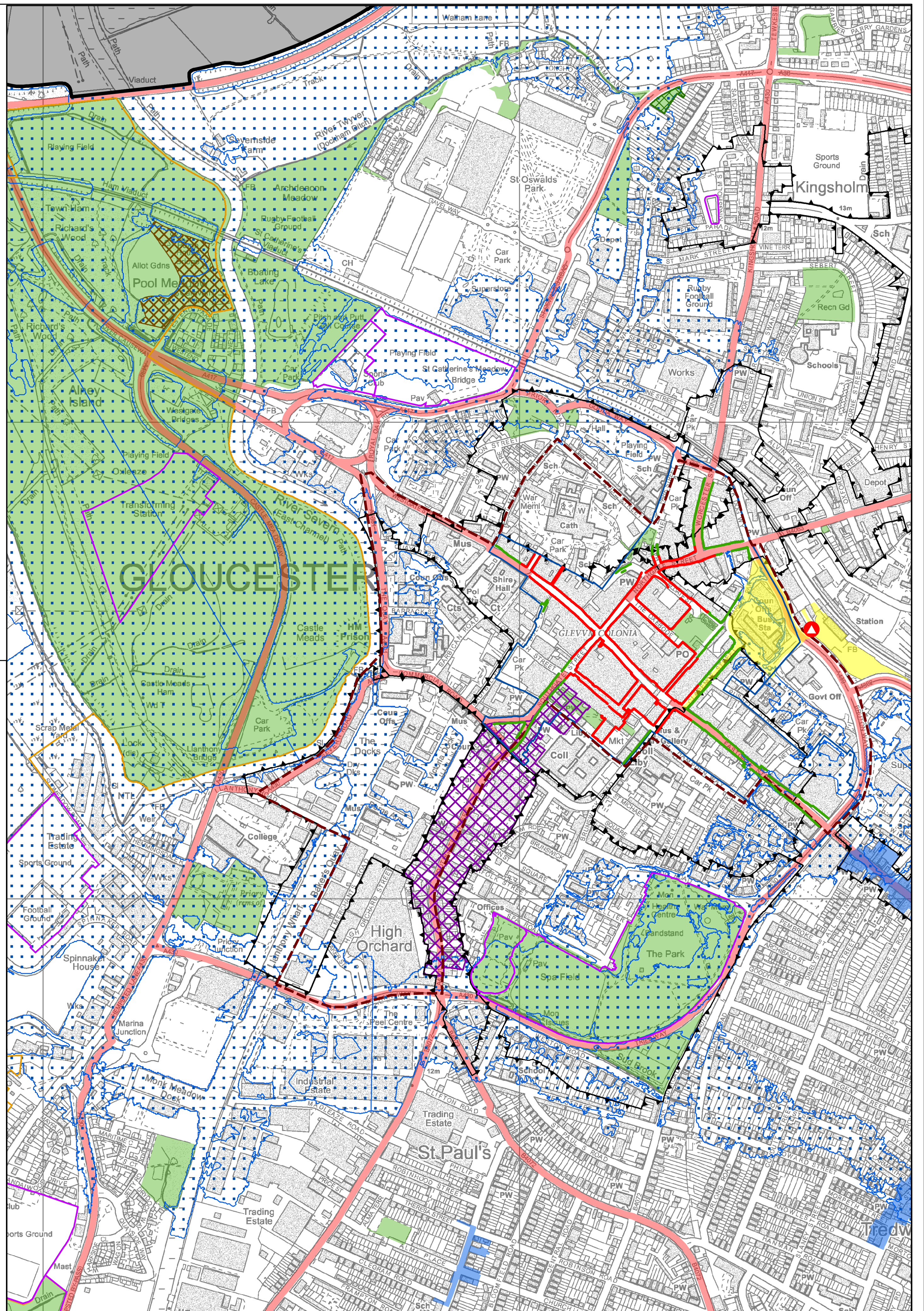


Scale 1:500

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence no 100019169. 2016.

## Key

-  Playing Field
-  Bus and Rail Interchange
-  Strategic Infrastructure Projects
-  Proposed Primary Shopping Area Revised
-  Shopping Area Primary Frontage
-  Shopping Area Secondary Frontage
-  Nature Improvement Area
-  Public Open Space
-  Article 4 Area – Southgate THI
-  Key Routes into the City Centre
-  Conservation Area
-  City Centre Boundary
-  Existing Travelling Showpeoples Site
-  District Centre
-  Local Centre
-  Floodzone 3 (Environment Agency)



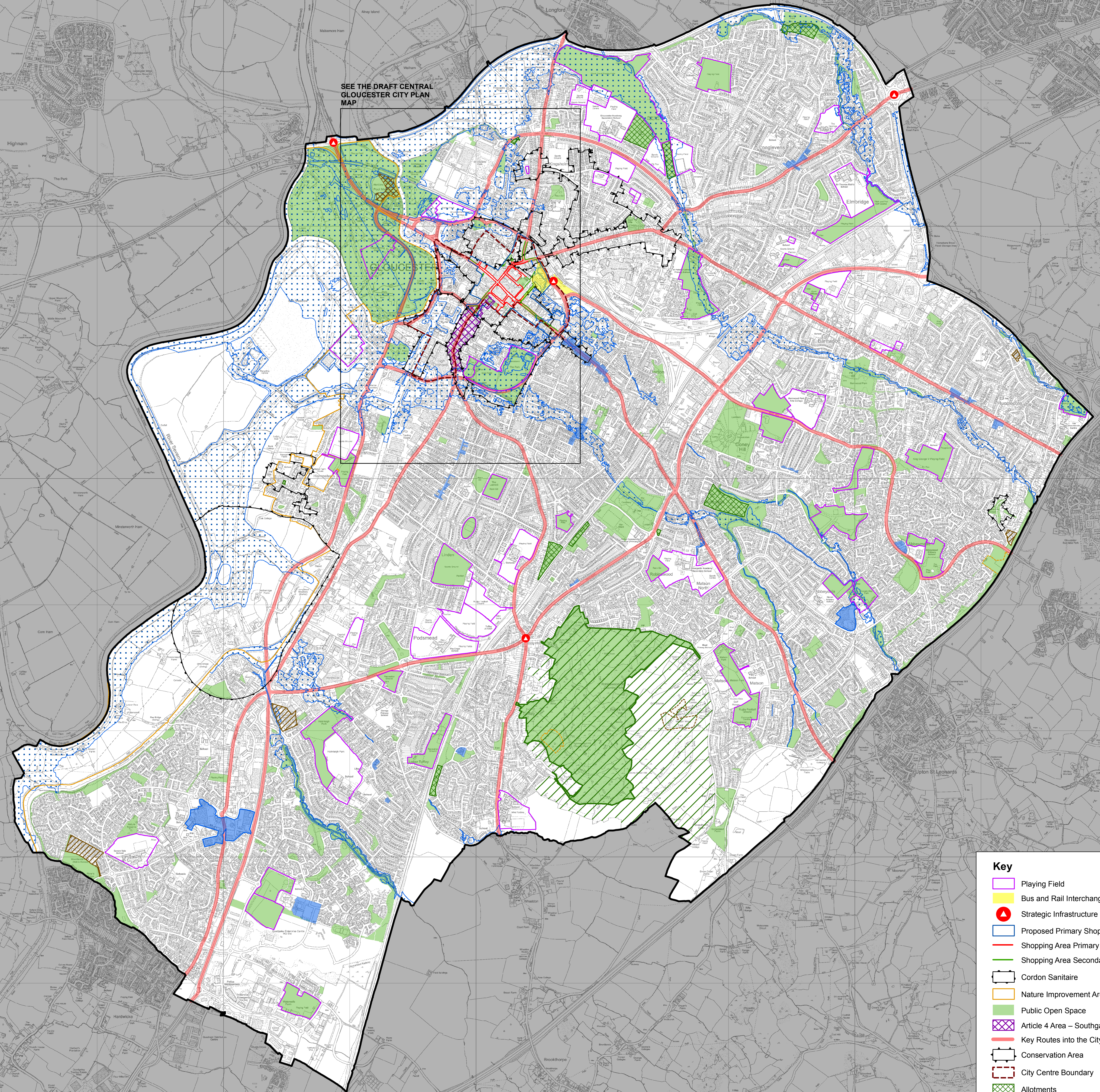
This page is intentionally left blank





# DRAFT Gloucester City Plan Map

SEE THE DRAFT CENTRAL  
GLOUCESTER CITY PLAN  
MAP



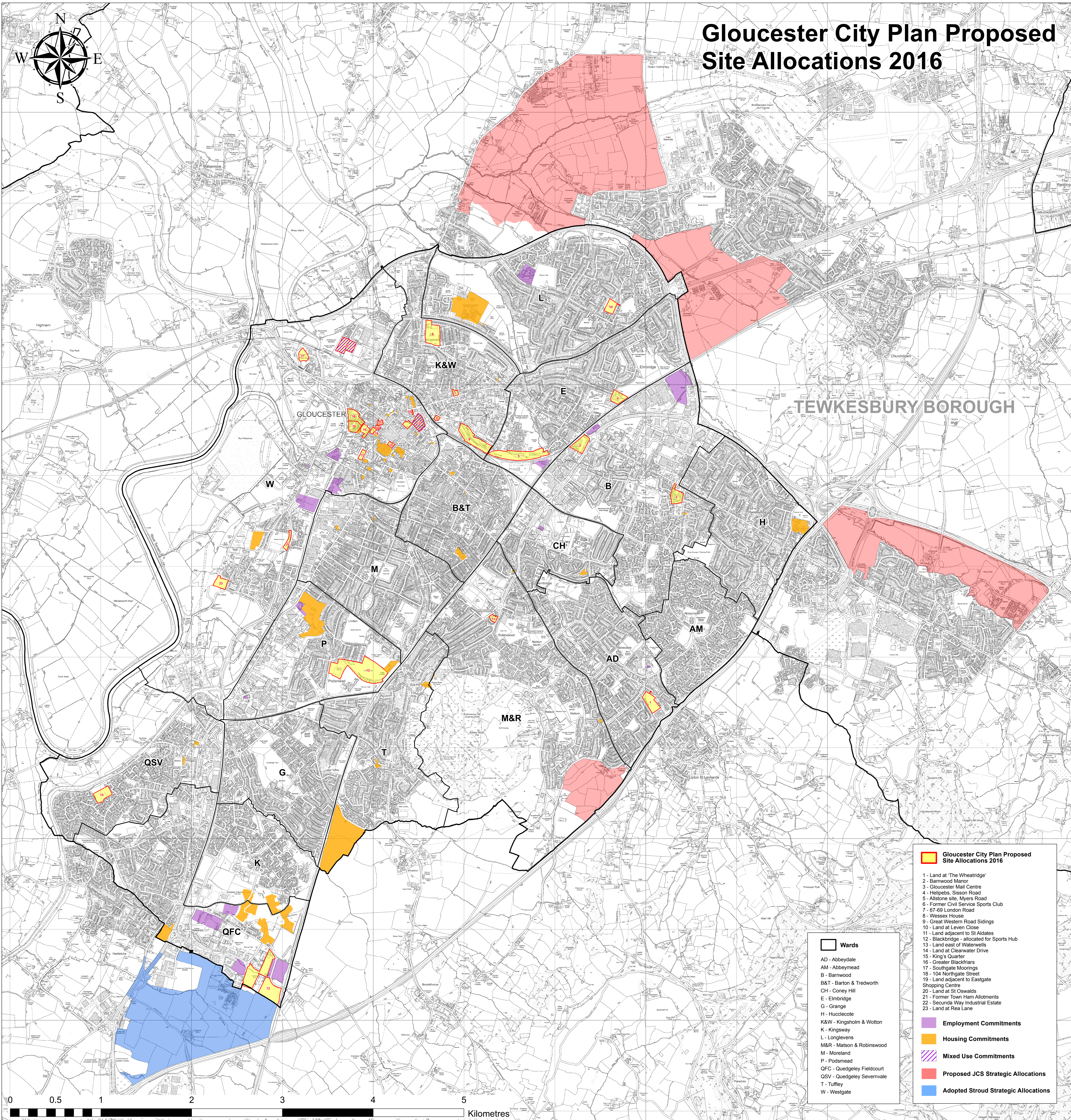
Key	
	Playing Field
	Bus and Rail Interchange
	Strategic Infrastructure Projects
	Proposed Primary Shopping Area Revised
	Shopping Area Primary Frontage
	Shopping Area Secondary Frontage
	Cordon Sanitaire
	Nature Improvement Area
	Public Open Space
	Article 4 Area – Southgate THI
	Key Routes into the City Centre
	Conservation Area
	City Centre Boundary
	Allotments
	Ancient Woodland
	Sites of Special Scientific Interest (SSSI)
	High Landscape Value
	Existing Travelling Showpeoples Site
	Static Caravan Park
	Robinswood Hill Country Park
	District Centre
	Local Centre
	Floodzone 3 (Environment Agency)



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorized reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence no 100019169, 2016.

This page is intentionally left blank

# Gloucester City Plan Proposed Site Allocations 2016



TEWKESBURY BOROUGH

### Gloucester City Plan Proposed Site Allocations 2016

- 1 - Land at 'The Wheatridge'
- 2 - Barnwood Manor
- 3 - Gloucester Mail Centre
- 4 - Heilings, Sisson Road
- 5 - Allstone site, Myers Road
- 6 - Former Civil Service Sports Club
- 7 - 67-69 London Road
- 8 - Wessex House
- 9 - Great Western Road Sidings
- 10 - Land at Leven Close
- 11 - Land adjacent to St Aldates
- 12 - Blackbridge - allocated for Sports Hub
- 13 - Land east of Waterwells
- 14 - Land at Clearwater Drive
- 15 - King's Quarter
- 16 - Greater Blackfriars
- 17 - Southgate Moorings
- 18 - 104 Northgate Street
- 19 - Land adjacent to Eastgate Shopping Centre
- 20 - Land at St Oswalds
- 21 - Former Town Hall Allotments
- 22 - Secunda Way Industrial Estate
- 23 - Land at Rea Lane

### Wards

- AD - Abbeydale
- AM - Abbeymead
- B - Barnwood
- B&T - Barton & Tredworth
- CH - Coney Hill
- E - Elmbridge
- G - Grange
- H - Hucclecote
- K&W - Kingsholm & Wotton
- K - Kingsway
- L - Longlevens
- M&R - Matson & Robinswood
- M - Moreland
- P - Podsmead
- QFC - Quedgeley Fieldcourt
- QSV - Quedgeley Severnvale
- T - Tuffley
- W - Westgate

### Employment Commitments

### Housing Commitments

### Mixed Use Commitments

### Proposed JCS Strategic Allocations

### Adopted Stroud Strategic Allocations

This page is intentionally left blank