



# Gloucester City Council

## Cabinet

**Meeting: Wednesday, 11th September 2019 at 6.00 pm in Civic Suite -  
North Warehouse, The Docks, Gloucester, GL1 2EP**

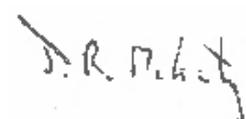
<b>Membership:</b>	Cllrs. James (Leader of the Council and Cabinet Member for Regeneration and Economy) (Chair), Watkins (Deputy Leader and Cabinet Member for Communities and Neighbourhoods), Cook (Cabinet Member for Environment), Gravells (Cabinet Member for Planning and Housing Strategy), Morgan (Cabinet Member for Culture and Leisure) and H. Norman (Cabinet Member for Performance and Resources)
<b>Contact:</b>	Democratic and Electoral Services 01452 396126 <a href="mailto:democratic.services@gloucester.gov.uk">democratic.services@gloucester.gov.uk</a>

## 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>MINUTES</b> (Pages 7 - 14)  To approve as a correct record the minutes of the meetings held on 14 <sup>th</sup> August and 10 <sup>th</sup> July 2019.
<b>4.</b>	<b>PUBLIC QUESTION TIME (15 MINUTES)</b>  The opportunity is given to members of the public to put questions to Cabinet Members or Committee Chairs 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>

<p><b>5.</b></p>	<p><b>PETITIONS AND DEPUTATIONS (15 MINUTES)</b></p> <p>To receive any petitions or deputations provided that no such petition or deputation is in relation to:</p> <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>
<p><b>6.</b></p>	<p><b>LEADER AND CABINET MEMBERS' QUESTION TIME (15 MINUTES)</b></p> <p>Any Member of the Council may ask the Leader of the Council or any Cabinet Member any question without prior notice, upon:</p> <ul style="list-style-type: none"> <li>• Any matter relating to the Council's administration</li> <li>• Any matter relating to any report of the Cabinet appearing on the summons</li> <li>• A matter coming within their portfolio of responsibilities</li> </ul> <p>Only one supplementary question is allowed per question.</p>
<p><b>7.</b></p>	<p><b>GLOUCESTER CITY PLAN - PRE-SUBMISSION PUBLICATION (Pages 15 - 162)</b></p> <p>To consider the report of the Cabinet Member for Planning and Housing Strategy seeking agreement on the 'Pre-Submission' Gloucester City Plan for publication and submission to examination to enable the Council to progress the Gloucester City Plan to adoption to help meet identified growth needs.</p>
<p><b>8.</b></p>	<p><b>COMMUNITY SAFETY UPDATE REPORT (Pages 163 - 182)</b></p> <p>To consider the report of the Cabinet Member for Communities and Neighbourhoods updating Members on the Stronger Safer Gloucester Partnership's most recent community safety work.</p>
<p><b>9.</b></p>	<p><b>CULTURE VISION AND STRATEGY 2016-2026 PROGRESS REPORT, GLOUCESTER CULTURE TRUST ANNUAL REPORT TO COUNCIL</b></p> <p>To consider the report of the Corporate Director and Gloucester Culture Trust Director presenting a progress report on delivery of the City's Cultural Vision and Strategy 2016-2026 and an update on delivery of the Great Place Programme. The report also presents the annual activity report of the Gloucester Culture Trust which was established as part of the Cultural Strategy to lead the City's cultural development.</p> <p>TO FOLLOW</p>
<p><b>10.</b></p>	<p><b>KINGS HOUSE AND GLOUCESTER CULTURE TRUST FUTURE FINANCIAL SUPPORT</b></p> <p>To consider the report of the Corporate Director seeking approval to offer Kings House for the Culture Trust's Creative Workspace Hub and Music Studios for The Music Works, an agreement to explore the potential of sustaining a Gloucester Festivals Innovation Fund and a commitment from the City Council for future funding from to allow the Culture Trust to continue to develop its activities and attract external funding into the City.</p> <p>TO FOLLOW</p>

11.	<p><b>FINANCIAL MONITORING QUARTER 1 2019/20</b> (Pages 183 - 194)</p> <p>To consider the report of the Cabinet Member for Performance and Resources seeking for year-end forecasts, and progress made against agreed savings targets for the 1st Quarter ended 30th June 2019 to be noted.</p>		
12.	<p><b>STRATEGIC RISK REGISTER UPDATE AND RISK MANAGEMENT ACTION PLAN 2019/20</b> (Pages 195 - 220)</p> <p>To consider the report of the Head of Audit Risk Assurance (Chief Internal Auditor) presenting the Strategic Risk Register and the Risk Management Action Plan 2019/20.</p>		
13.	<p><b>GYPSY, TRAVELLERS AND TRAVELLING SHOWPEOPLE - ACCOMMODATION NEED UPDATE</b> (Pages 221 - 228)</p> <p>To consider the report of the Cabinet Member for Planning and Housing Strategy updating Members on the current position in identifying permanent residential sites for Gloucester's Gypsy, Traveller and Travelling Showpeople communities and transit sites for those travelling through the county.</p>		
14.	<p><b>EXCLUSION OF PRESS AND PUBLIC</b></p> <p><b>To resolve:</b> that the press and public be excluded from the meeting during the following items of business on the grounds that it is likely, in view of the nature of business to be transacted or the nature of the proceedings, that if members of the press and public are present during consideration of these items there will be disclosure to them of exempt information as defined in Schedule 12A of the Local Government Act 1972 as amended.</p> <p><b>Agenda Item Nos. Description of Exempt Information</b></p> <table border="0" data-bbox="300 1249 1417 1323"> <tr> <td style="padding-right: 20px;">15, 16</td> <td>Paragraph 3: Information relating to the financial or business affairs of any particular person (including the authority holding that information).</td> </tr> </table>	15, 16	Paragraph 3: Information relating to the financial or business affairs of any particular person (including the authority holding that information).
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15.	<p><b>ST. OSWALDS REGENERATION REVIEW</b></p> <p>To consider the report of the Cabinet Member for Regeneration and Economy seeking an agreement on a way forward for the development of the vacant land at St. Oswalds in conjunction with the retail park owned by Hammerson.</p>		
16.	<p><b>GLOUCESTERSHIRE AIRPORT LIMITED</b> (Pages 229 - 286)</p> <p>To consider the report of the Cabinet Member for Environment seeking approval to further support Gloucestershire Airport Limited (GAL) through a series of recommendations in delivery of the business plan following the work commenced in 2017 by both Gloucester City and Cheltenham Borough Councils.</p>		



**Jon McGinty**  
Managing Director

**Date of Publication: Tuesday, 3 September 2019**

## 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**

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For 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.

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## CABINET

**MEETING** : Wednesday, 14th August 2019

**PRESENT** : Cllrs. James (Chair), Watkins, Morgan and H. Norman

**Others in Attendance**

Corporate Director

Corporate Director

Head of Policy and Resources

City Improvement and Environment Manager

Property Commissioning Manager

David Rice, Democratic Services and Elections Officer

**APOLOGIES** : Cllrs. Cook and Gravells

### 25. DECLARATIONS OF INTEREST

There were no declarations of interest.

### 26. EXCLUSION OF THE PRESS AND PUBLIC

**RESOLVED** that the press and public be excluded from the meeting during the following item of business (Agenda item 4) on the grounds that it is likely, in view of the nature of business to be transacted or the nature of the proceedings, that if members of the press and public are present during consideration of this item there will be disclosure to them of exempt information as defined in Schedule 12A of the Local Government Act 1972 as amended.

### 27. ROBINSWOOD HILL VISITOR CENTRE

Cabinet considered the report of the Cabinet Member for Environment that provided an update on the development of the Robinswood Hill Visitor Centre and presented a request for additional financial support from the Gloucestershire Wildlife Trust.

**RESOLVED** as per the recommendations in the confidential report

**Time of commencement: 5.30 pm**

**Time of conclusion: 5.35 pm**

**Chair**

**CABINET**  
**14.08.19**



## CABINET

**MEETING** : Wednesday, 10th July 2019

**PRESENT** : Cllrs. James (Chair), Watkins, Cook, Gravells, Morgan and H. Norman

**Others in Attendance**

Cllrs Haigh and Coole

Managing Director

Corporate Director

Corporate Director

Head of Policy and Resources

Head of Place

Head of Communities

Major Projects Consultant

Principal Conservation Officer

Democratic Services and Elections Officer

**APOLOGIES** : None

**13. DECLARATIONS OF INTEREST**

There were no declarations of interest.

**14. MINUTES**

**RESOLVED** that the minutes of the meeting held on 12th June 2019 be confirmed as a correct record and signed by the Chair.

**15. PUBLIC QUESTION TIME (15 MINUTES)**

There were no public questions.

**16. PETITIONS AND DEPUTATIONS (15 MINUTES)**

There were no petitions or deputations.

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**10.07.19**

**17. LEADER AND CABINET MEMBERS' QUESTION TIME (15 MINUTES)**

Cllr Haigh reminded Members of the discussions concerning the layout of the new City Council Westgate Street customer reception (The Gateway) at the special Overview and Scrutiny Committee (O&S) meeting of 12<sup>th</sup> March 2019. She asked if the illustrations published on the Council website were accurate as they did not reflect the outcome of those discussions particularly regarding the privacy of people in the interview booths. The Cabinet Member for Performance and Resources replied that the illustrations were merely conceptual representations and that elected members had been updated on changes by email. The Head of Communities confirmed that, unlike those illustrated, the interview booths would have half solid and half frosted glass screens completely obscuring occupants from those seated in waiting areas and mostly obscuring occupants from those standing. Cllr Haigh stated that she had not been informed of the introduction of full glass panels for the booths. She reiterated the concern expressed at the O&S meeting over occupants being identified from the street and sought reassurance that the matter would be addressed. The Cabinet Member for Performance and Resources stated that frosted external glazing would prevent individuals inside The Gateway being identified from outside. She commented on the need for compromise in the booths as full solid screens might feel oppressive to occupants. The Cabinet Member for Performance and Resources gave assurance that feedback around the function of the screens already ordered from suppliers will be very carefully monitored and replacement considered if necessary and cost effective.

**18. EQUALITY AND DIVERSITY - VISION AND ACTION PLAN FOR 2019-20**

Cabinet considered the report of the Cabinet Member for Communities and Neighbourhoods that updated Members on the work of the Equalities Working Group and the Equalities Action Plan for 2019/20.

The Cabinet Member for Communities and Neighbourhoods introduced the report and gave examples of how the relationship between the Council and many residents had improved through active engagement with, and support of, local communities. She noted that the action plan represented the continuing passion and hard work of officers, partners and elected members of all parties and thanked them all.

**RESOLVED** that the work of the Equalities Working Group (EWG) and the Equalities Action Plan (EAP) for this year be endorsed.

**19. COMMUNITY WELLBEING ENGAGEMENT UPDATE**

Cabinet considered the report of the Cabinet Member for Communities and Neighbourhoods that sought to update Members on the most recent community engagement work within the community wellbeing team.

The Cabinet Member for Communities and Neighbourhoods drew Members' attention to the important role of the team in building the positive relationships with partners and communities that enable the root of problems to be addressed and

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effective solutions to be found. She placed this work in the context of the shift to delivering services based on Asset Based Community Development (ABCD) principals empowering communities, an approach which has yielded successes such as the Podsmead Clearance Team social enterprise. The Cabinet Member for Performance and Resources commented that these could be widely shared as case studies. The Cabinet Member for Communities and Neighbourhoods advised Members that other local authorities had already pursued an interest in learning from Gloucester's model of working and how it will be developed further in the city. The Cabinet Member for Culture and Leisure emphasised the breadth of the improvements generated by such a fundamental shift in approach. The Cabinet Member for Planning and Housing Strategy informed Members of the contrast he observed between the process and enforcement driven approach when he was first elected to the Council that left residents in isolation to deal with multiple agencies and the current nurture of partnerships. He further commented on the wider benefits of the approach such as the implementation of the new noise service leading to neighbours talking to each other for the first time.

**RESOLVED** that the community engagement work undertaken by the Community Wellbeing Team, particularly using Asset Based Community Development and strengths-based working be noted.

**20. 2018-19 FINANCIAL OUTTURN REPORT**

Cabinet considered the report of the Cabinet Member for Performance and Resources that informed Members of the final Council position against agreed budgets for the 2018/19 financial year and sought that the final outturn position be noted and movement to and from earmarked revenue reserves be approved.

The Cabinet Member for Performance and Resources highlighted the key parts of the report. The Cabinet Member for Culture and Leisure acknowledged the financial pressures on his portfolio but noted that the net spend had decreased by £268,000 since the 2017/18 outturn position. He informed Members that he been impressed by the enthusiasm and willingness to adapt to change demonstrated by officers as challenges continue to be addressed. The Cabinet Member for Communities and Neighbourhoods referred to the financial costs associated with homelessness. She reassured Members that work is ongoing to tackle the problem with a broad range of measures including the addition of 48 units of temporary accommodation expected to be secured imminently. The Cabinet Member for Regeneration and Economy commented that although progress had been positive, there were nonetheless areas requiring attention.

**RESOLVED:**

(1) it is noted that:

- i. the year-end position for the financial year 2018/19 is an increase to the General Fund balance of £37k.
- ii. the General Fund balance has increased from £1.636m to £1.673m at the end of 2018/19.
- iii. the savings achieved in year total £150k.
- iv. the level of earmarked reserves has reduced by £152k to £4.567m.

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(2) that the transfers to and from earmarked reserves as detailed in the table in section 6 of the report is approved

**21. 2018-19 YEAR END PERFORMANCE REPORT**

Cabinet considered the report of the Cabinet Member for Performance and Resources that informed Members of the Council's performance against key measures in 2018-19.

The Cabinet Member for Performance and Resources outlined the most significant trends, the background to them and work being undertaken for improvement. She reminded Members that Cabinet had previously approved (12 June 2019) the establishment of two new posts to deliver effective performance, governance and strategy management and that these would contribute to a sharpening of the data to be presented in future reports. The Cabinet Member for Planning and Housing Strategy referred to the positive progress made against targets for the determination of major and minor planning applications (CDG5, CDG6) and commented that this would be good news for developers considering investment in the city. The Cabinet Member for Communities and Neighbourhoods drew Members' attention to the constructive feedback made by the Overview and Scrutiny Committee at their meeting of 1 July 2019 (Minute 18), especially around customer telephone waiting times (CST2). She reassured them that the concerns raised made were being addressed. The Cabinet Member for Environment commended the format of the report. This was reiterated by the Cabinet Member for Regeneration and Economy who further stated that it enabled focus to be directed to both successes and areas requiring improvement.

**RESOLVED** that the Year End Performance Report for 2018-19 at Appendix 1 of the report is noted.

**22. COUNCIL TAX - CIVIL PENALTIES**

Cabinet considered the report of the Cabinet Member for Performance and Resources that recommended the introduction of a Council Tax Civil Penalty Policy for those residents who make incorrect statements or fail to notify a change in their circumstances, fail to provide information or knowingly provide incorrect information therefore obtaining an incorrect council tax discount, reduction or an exemption from their council tax account.

The Cabinet Member for Performance and Resources placed the report in the context of current practice by other local authorities. The Cabinet Member for Environment commented that it was right for people deliberately misreporting to be penalised. The Cabinet Member for Planning and Housing Strategy expressed approval that the proposed policy would account for individual circumstances so that people who had innocently provided incorrect information might not face the penalty.

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**RESOLVED** that a Council Tax Civil Penalty Policy is implemented from 17 July 2019 which would see a £70 civil penalty imposed on those residents who knowingly obtain an incorrect discount or exemption from their council tax as outlined in Appendix A of the report.

**23. GLOUCESTER HERITAGE STRATEGY**

Cabinet considered the report of the Cabinet Member for Regeneration and Economy that informed Members of the approach taken to the production of the Gloucester Heritage Strategy 2019-29, presented the representations received on the draft strategy, and sought to secure Members' approval to adopt the strategy.

The Cabinet Member for Regeneration and Economy introduced the report and gave the background to it. He emphasised the importance of making the most of the city's rich heritage and advised that an action plan would be prepared to ensure its potential is realised and facilitate bids to outside bodies. The Cabinet Member for Regeneration and Economy drew Members' attention to the proposed creation of a 'Local List' as part of the Great Place scheme (Appendix 1 3.4) and reassured them that a report would be presented for Cabinet to consider any nominations for such a scheme following public consultation. The Cabinet Member for Culture and Leisure noted with approval that working with both partners and communities was embedded within the policy. He further commented on what has already been achieved and stated that he was looking forward to what will be achieved in future.

**RESOLVED** that the Gloucester Heritage Strategy 2019 to 2029 be adopted.

**24. KINGS QUARTER REGENERATION**

Cabinet considered the report of the Cabinet Member for Regeneration and Economy that sought to secure approval for the lease surrender of Bruton Way car park, extension of the project management contract and the necessary capital enabling costs to carry forward the momentum generated by the Kings Quarter regeneration project and ready the site for development.

The Cabinet Member for Regeneration and Economy summarised the report and stressed the importance of continuing the momentum of regeneration for Kings Quarter. He further advised members on the benefits of the proposals to remove buildings in visibly poor condition and conduct archaeological investigations which will inform future development.

**RESOLVED** that:

(1) the following activities be approved to assist in achieving the accelerated delivery programme for enabling the development of Kings Quarter and ensuring that the pace of change can be continued if planning permission is granted:

a) the surrender back to the Council of the present long lease to NCP Limited for the Bruton Way multi-storey car park at the earliest opportunity,

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10.07.19**

upon terms approved by the Property Commissioning Manager in consultation with the Head of Policy and Resources.

b) the extension of the contract for the Kings Quarter dedicated project management resource from 7th July 2019 until 6th January 2020, as envisaged by the original Cabinet approval dated 22nd June 2016, with Reef Estates Limited and to authorise the waiver of the contract rules under rule 6.1.5.

c) the allocation of additional costs required in respect of the determination of the Planning application for Kings Quarter and Kings Square as set out in Appendix A Table 1 of the report.

d) the demolition of Bruton Way Car Park, Bentinck House and partial demolition of the northern end of Grosvenor House.

(2) it be noted that subject to any necessary consents being obtained and the bids from the procurements listed in recommendation (1) and Appendix A, Table 1 in the report being in budget the Council will award the contracts (having first followed the appropriate decision-making process) to enable those works to be undertaken after determination of the planning application.

(3) it be noted that further budget will need to be identified for the next phases of the regeneration programme. Future Enabling Works associated with this have been listed in Appendix A Table 2 of the report.

**Time of commencement: 6.00 pm**

**Time of conclusion: 6.40 pm**

**Chair**

# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet Council</b>	<b>Date:</b>	<b>11 September 2019 26 September 2019</b>
<b>Subject:</b>	<b>Gloucester City Plan – Pre-Submission Publication</b>		
<b>Report Of:</b>	<b>Cabinet Member for Planning and Housing Strategy</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework:</b>	<b>Yes</b>
<b>Contact Officer:</b>	<b>Adam Gooch – Planning Policy Team Leader</b> <a href="mailto:Adam.Gooch@gloucester.gov.uk">Adam.Gooch@gloucester.gov.uk</a> / 01452 39-6836		
<b>Appendices:</b>	<b>1. Pre-Submission Gloucester City Plan 2. Policies Map</b>		

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 To agree the Pre-Submission Gloucester City Plan for publication and submission to examination to enable the Council to progress the Gloucester City Plan to adoption to help meet identified growth needs.

### 2.0 Recommendations

- 2.1 Cabinet is asked to **RECOMMEND** to Council that:

(1) it approves the Pre-Submission Gloucester City Plan for Publication under the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version of the Gloucester City Plan proposed to be submitted to the Secretary of State for independent examination.

- 2.3 Council is asked to:

(1) Approve the Pre-Submission Gloucester City Plan for Publication under the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version of the Gloucester City Plan proposed to be submitted to the Secretary of State for independent examination.

(2) Delegate authority to the Head of Place, in consultation with the Cabinet Member for Housing and Planning, to make minor amendments to the Pre-Submission Gloucester City Plan in relation to any grammatical and factual errors in advance of Publication.

### 3.0 Background and Key Issues

- 3.1 Following on from the adoption of the Joint Core Strategy (JCS) in December 2017, the Gloucester City Plan (GCP) has now been progressed to the next stage of the

process. The JCS provides strategic level planning policies, including housing and employment land requirements and large land allocations. The GCP sits underneath the JCS, further to those strategic policies and delivering it locally and addressing local issues and opportunities. Together they form the Local Plan for Gloucester City and provide full planning policy coverage.

- 3.2 The GCP has been informed by four rounds of public consultation, engagement with officers, external stakeholders and statutory consultees such as the Environment Agency, Natural England and Severn Trent.
- 3.3 It is underpinned by a significant amount of technical evidence, including a Strategic Flood Risk Assessment, Highways Assessment, Infrastructure Delivery Plan, Viability Appraisal, Sustainability Appraisal and Habitats Regulations Assessment.
- 3.4 The contents of the GCP have been considered and informed by the Planning Policy Member Working Group. This cross-party group was created in July 2018 following the removal of Planning Policy Sub-Committee and has played an active role in shaping and improving the vision, key principles and policies.

### **What does the plan contain?**

#### ***Vision and key principles***

- 3.5 The vision and key principles reflect the Council Plan (2017 – 2020), City Vision and other corporate plans and strategies, including the Regeneration and Economic Development Strategy (2016 – 2021). They also reflect the issues and opportunities that exist within the city, where they can be addressed through planning policy.

#### ***Development management policies***

- 3.6 The GCP includes development management policies that will positively influence development proposals and protect and enhance the natural and built environment. They include policies to support the delivery of purpose-built student accommodation, self-build and custom house building, deliver economic growth, create safer and better-quality places to live, ensure quality living environments for existing and future residents and tackle climate change.
- 3.7 Importantly, the GCP seeks to take the JCS affordable housing policy further, providing clarity to developers on what is expected of them. The position of the JCS is that Gloucester can secure 'at least' 20% affordable housing on development sites over 11 dwellings and that the viability of a site may enable additional levels of affordable housing to be delivered. This was on the basis that there are different 'value areas' within the city with different levels of viability. Through the GCP, additional evidence has been prepared through the 'Viability Appraisal' to analyse this further. It looks at different options; a blanket percentage requirement; the identification of value 'zones' with different percentage requirements; and a percentage based on the size of site. The analysis concluded that the most robust approach would be the identification of a blanket approach, and that this should be set at 25% in order to maintain viability.
- 3.8 The plan is particularly strong in supporting healthier communities, for example in encouraging people to lead more active and healthier lifestyles through access to

nature and green infrastructure, limit opportunities for hot food takeaways and prevent falls from taller buildings. The latter example requires developers to put in place measures to prevent measures on buildings over 12 metres to prevent attempted suicide and to the best our knowledge, is the first in the UK.

- 3.9 The City Council recently declared a climate change emergency. The GCP does everything it can (together with policies already set out in JCS) to support climate change adaptation and mitigation. This includes for example policies to ensure new development is located to avoid flood risk and take opportunities to improve flood risk from fluvial and pluvial sources, that opportunities are realised to reduce the need to travel by the private car through active travel and the use of public transport, and to ensure the delivery of green infrastructure and water efficiency standards.

***Development needs and site allocations***

- 3.10 Gloucester has a limited supply of land for development and the role of the GCP is to identify site allocations that can contribute to the delivering development needs, making the most efficient use of finite land. Sites have been identified through a variety of sources, including ongoing and targeted ‘call for sites’, the brownfield register and a review of internal land assets. In total, there are 22 site allocations for residential, employment, mixed-use and community development.
- 3.11 In terms of housing, the adopted JCS identifies a need of 14,359 new homes for Gloucester between 2011 and 2031. Approximately 34% of these will be delivered through strategic allocations in Tewkesbury Borough. Most of the remainder have been or will be delivered within the administrative area of Gloucester City, including new homes constructed since 2011, those with planning consent / currently under construction, and those allocated in the GCP. There is a shortfall of 708 dwellings, which is being taken forward through the JCS Review, which has already commenced. Full details are provided below.

	<b>Gloucester City</b>	<b>Tewkesbury Borough</b>
JCS Strategic allocations (Tewkesbury Borough)	-	4,895
Winnycroft Strategic allocation (Gloucester City)	620	-
Completed	3,993	
Planning consents	2,339	-
‘Windfall allowance’	640	-
Gloucester City Plan allocations	972	-
<b>TOTAL</b>	<b>13,459</b>	

**Table 1: Housing supply 2011 – 2031, Gloucester City**

- 3.12 From an employment land perspective, the JCS identified a figure of 192 hectares across the three local authority areas. A substantial amount of this is identified at the strategic allocations, with an additional 14.6 hectares identified through employment / mixed-use allocations within the GCP.
- 3.13 The GCP also makes an allocation for a multi-sports and community hub at Blackbridge, in response to the recommendation in the City Council’s adopted Playing Pitch Strategy.

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

4.1 The GCP provides a policy framework to inform future planning decisions.

#### **5.0 Alternative Options Considered**

5.1 Together with the JCS, once adopted, the GCP will form the Local Plan for Gloucester City. The JCS sets out an urban focussed strategy, maximising the urban capacity of the city where reasonable to do so, with sustainable urban extensions. This strategy was tested against reasonable alternatives at the JCS examination, found sound and subsequently adopted. The role of the GCP is to deliver this locally.

5.2 Each of the site allocations has been tested through the plan-making process to ensure that the site has been allocated for the most appropriate use, having regard to identified needs and the character of the wider area.

5.3 In relation to the affordable housing policy, three different options were tested to ensure the most robust option was taken forward. This is explained in more detail in paragraph 3.7 above.

#### **6.0 Reasons for Recommendations**

6.1 Following the adoption of the JCS in December 2017, the GCP has now been progressed to the final stage in its preparation, Pre-Submission, before Submission to the Planning Inspectorate for independent examination. The Pre-Submission GCP has been informed by several rounds of public consultation, a substantial evidence base, engagement with statutory consultees and internal expertise and in the opinion of officers, meets the 'tests of soundness' and is 'legally compliant'.

#### **7.0 Future Work and Conclusions**

7.1 Once approved by Council, the Pre-Submission GCP will be Published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for consultation. This will last for a six-week period, after which the Plan will be submitted to the Planning Inspectorate for Examination in Public.

7.2 In terms of the identified shortfall of sites in the latter part of the plan period, this is being taken forward by the Joint Core Strategy, which has already commenced. A review is also underway in relation to retail and city/town centres and it is anticipated this will be accelerated in advance of the wider JCS review.

#### **8.0 Financial Implications**

8.1 The Examination in Public has financial costs. The Planning Inspectorate charge for their time and it will be necessary to employ legal expertise and technical support. Costs are somewhat uncertain and depend on the nature and length of discussions however, based on a review of recent experience of other Local Plan examinations, a cost in the region of £100,000 is anticipated. These are being factored the budget requirements of City Growth and Delivery.

## **9.0 Legal Implications**

- 9.1 The Council is required to have an up to date local plan (development plan documents) for its area and must prepare it in accordance with legislative requirements, including ensuring the compliance with the Statement of Community Involvement, and must contain a reasoned justification for the policies contained in it.
- 9.2 The development plan for Gloucester City's administrative area is made up of the development plan documents which have been adopted or approved in relation to its area and any neighbourhood development plans which have been made in relation to that area.
- 9.3 If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted or made (as the case may be).
- 9.4 Legislation requires that where a development plan document contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.
- 9.5 Under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 before submitting a local plan to the Secretary of State for independent examination the Council must make a copy of all the proposed submission documents and a statement of representations procedure available via: their website; their principal office and such other places within their area as they consider appropriate; for a period of at least 6 weeks.
- 9.6 The proposed submission documents are to be the local plan which the Council proposes to submit to the Secretary of State; a submission policies map where the local plan if adopted would result in changes to the adopted policies map; a sustainability appraisal report of the local plan; a statement setting out the consultations already undertaken prior to the regulation 19 publication stage; a summary of the main issues raised by those representations and how those main issues have been addressed in the Pre-Submission local plan; and such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.
- 9.7 The statement of representations procedure must include the date by which representations about the local plan must be received and the address to which representations about the local plan must be made (representations may be made in writing or by way of electronic communications).
- 9.8 In addition to the proposed submission documents, on submission for independent examination the Council must also send a statement setting out as regards the regulation 19 Pre-Submission publication, the number of representations received in accordance with the representations procedure, copies of those representations and a summary of the main issues raised in those representations.

## 10.0 Risk & Opportunity Management Implications

10.1 A risk register has been completed in support of this report. Potential risks and mitigations are as follows:

Risk	Mitigation
Gloucester City Plan not approved by Council for Publication and Submission	The vision, key principles, development management policies and allocations within the Plan have been considered by the cross-party Planning Policy Member Working Group during preparation and will be considered by Overview and Scrutiny Committee in advance of Council. The contents reflect the Council Plan and other plans and strategies.
Gloucester City Plan found unsound at Examination in Public	Officers have worked closely with colleagues and One Legal to ensure the contents of the plan meet the 'tests of soundness' and are legally compliance. The examination in public process allows for changes to be made as 'main modifications'; these are changes necessary to make the plan sound.
Under-resourcing in terms of people and budget to progress the Gloucester City Plan through Examination in Public.	Budget forecasts have been made, with contingency, and fed into the annual budgeting process.

## 11.0 People Impact Assessment (PIA):

11.1 A PIA screening has been undertaken and it concludes that the Pre-Submission GCP would have a positive impact on all protected characteristics identified.

## 12.0 Other Corporate Implications

### Community Safety

12.1 The GCP includes policies to ensure the developments are designed in such a way to as to maximise opportunities to create safe environments.

### Sustainability

12.2 The Gloucester City Plan must go and has gone through a Sustainability Appraisal/Strategic Environmental Assessment process and Habitats Regulation Assessment, which considers the environmental, social and economic outputs of the Plan and ensures that development meets the needs of both present and future generations.

### Staffing & Trade Union

12.3 None

**Background Documents:** None

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# **Gloucester City Plan 2011 - 2031**

## **Pre-Submission**

### **Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012**

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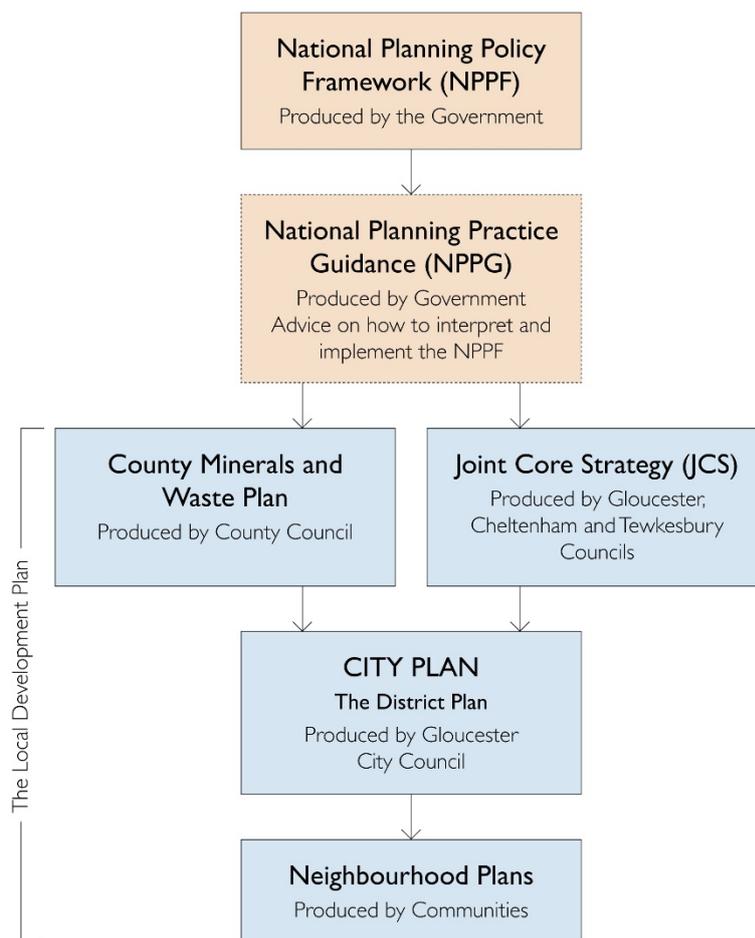
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# 1.Introduction and Overview

## What is the Gloucester City Plan?

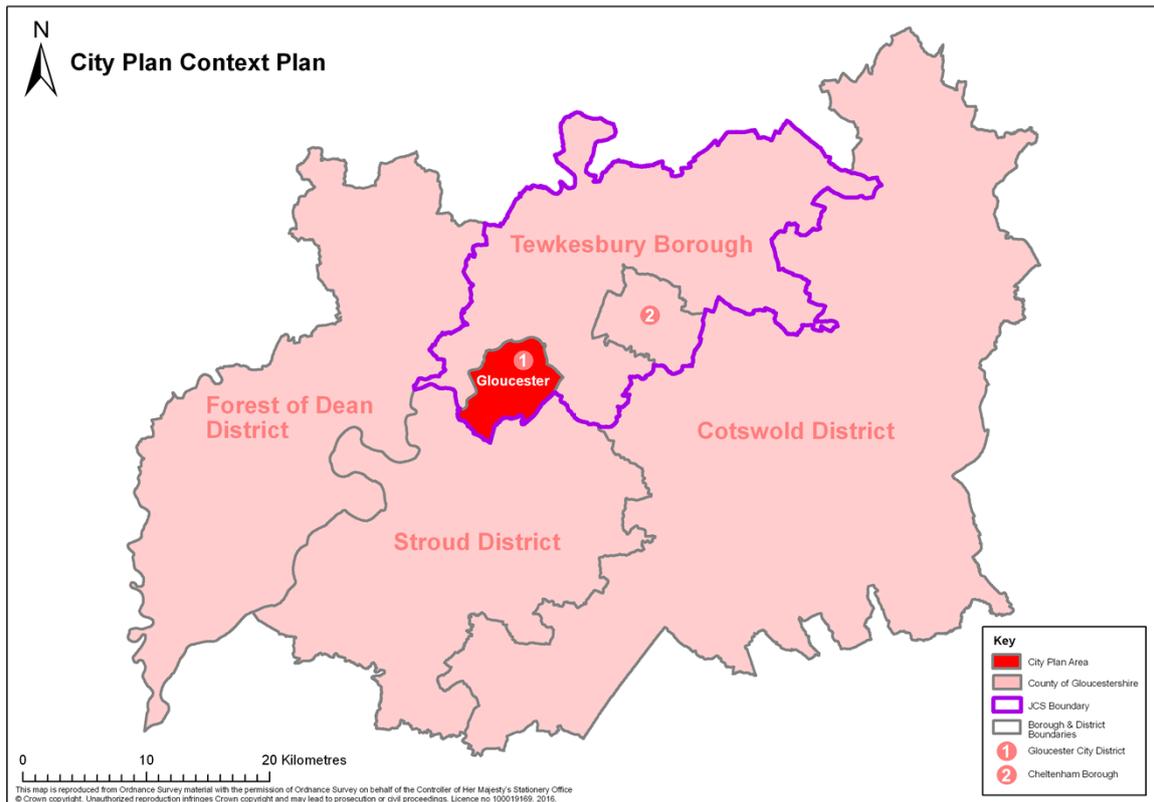
1.1 The Gloucester City Plan (GCP), together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), the Gloucestershire Minerals and Waste Local Plans and any Neighbourhood Plans will, when adopted, comprise the statutory Development Plan for Gloucester up to 2031. Whilst the development plan is primarily concerned with land-use planning, it is shared project that will support the delivery the Council Plan (2017 – 2020) and other strategies and plans. it is important the GCP is consistent with the objectives and principles of the JCS and the national content set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The diagram below shows the Development Plan for Gloucester City and its relationship with the NPPF and NPPG.



- 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.

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- 1.2 The JCS identifies larger sites for housing and employment and deals with strategic issues such as major infrastructure delivery and transport, the GCP will identify additional site allocations for smaller scale growth and set out detailed policies for development and key assets will be protected, for example heritage, open spaces and sports facilities. The map below shows the context Gloucester City Council and the GCP, in relation to the JCS area and Gloucestershire.
- 1.3 The GCP will deliver the JCS locally and addresses local issues and priorities. The GCP does not seek to cover strategic issues that are addressed by the JCS or the subsequent review of the JCS.



## Joint Core Strategy

- 1.4 The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. It is a strategic plan that covers a twenty-year period between 2011 and 2031, addressing cross-boundary planning matters including housing need for each of the local authorities, the need for employment land and strategic site allocations. The constrained nature of both Gloucester City and Cheltenham Borough means that it has been necessary for sites to be identified in Tewkesbury Borough to support the required levels of growth. The JCS was formally adopted by all three local authorities in December 2017.
- 1.5 The review has now begun and an 'Issues and Options' consultation was held between November 2018 and January 2019. This includes a focused and accelerated review of the retail and city/town centre policies which are already progressing. Further information is

available on the JCS website at [www.jointcorestrategy.org](http://www.jointcorestrategy.org).

## Neighbourhood Development Plans

- 1.6 Neighbourhood planning was first introduced in the Localism Act 2011 and Gloucester City Council has a duty to support communities in making their Neighbourhood Development Plan, commonly referred to as a Neighbourhood Plan. Neighbourhood Plans must support the delivery of strategic policies within the GCP.
- 1.7 At present, there are no Neighbourhood Plans in Gloucester City. However, if these were to be progressed in the future, and where they are 'made' (adopted), the plan and its policies will become a part of the Development Plan (together with the JCS and GCP) and will be used to guide development and determine applications in the designated neighbourhood planning area.

## Evidence base

- 1.8 Development plans are required to be supported and evidenced by robust evidence. The Gloucester City Plan (GCP) is supported by a wealth of supporting information including sustainability appraisals, habitats regulations assessment, flood risk assessment, infrastructure needs and viability appraisal. The full evidence base is available to view from the City Council's website.

## Sustainability appraisal

- 1.9 The Sustainability Appraisal and associated assessments are an integral part of the whole process, helping to shape by testing different policy options and potential site allocations for their contributions to ensure the plan is the most sustainable. The full sustainability appraisal assessment, for this and previous versions of the plan, are available to download from the City Council's website.

## What has happened so far?

- 1.10 This is the final stage in the preparation of the Gloucester City Plan (GCP) before it is submitted to the Planning Inspectorate for independent examination. The GCP has been prepared over several years and in different stages. At each stage, there has been engagement with the community and stakeholders on what the content of the GCP should be and to generate comments and debate on draft proposal as they emerge. The process to date has been as follows:
  - **Scope – 2011:** This consultation set out the context for the plan and the key issues for Gloucester. It sought views on the types of planning policies that the GCP should contain and the areas that should be identified for development or protection.
  - **Part 1 – 2012:** This stage of the plan took the scope further, providing further detail of the issues that Gloucester faces and setting out a number of 'key principles' that should be taken forward through the GCP.
  - **Part 2 – 2013:** This stage of the plan focused on the development needs of the city and considered potential site allocations.

- **Draft Plan – 2017:** This stage of the plan pulled the previous stages of the plan together, drawing on the outcomes of the different consultations to set out a range of proposed site allocations and detailed policies.
- 1.11 The City Council is now consulting on the final stage of the GCP, known as ‘Pre-Submission’. This is under Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2015. Between the Draft Plan and Pre-Submission version, changes have been made to reflect:
- Consultation responses;
  - Changes made to the Adopted Joint Core Strategy through the examination process;
  - Changes made by the Government to the National Planning Policy Framework and Planning Practice Guidance; and
  - New evidence and new City Council strategies.
- 1.12 Taken together, these changes have created a much more succinct plan and the number of policies has therefore reduced quite substantially. Policies relating to retail and city/town centres have been removed as they are now addressed through the Adopted Joint Core Strategy and are being taken forward as part of the Review.

## Responding to the consultation

- 1.13 The City Council is consulting on the Pre-Submission Gloucester City Plan for a period of six weeks between XX XXXXXX and XX XXXXXX 2019. Responses (known as ‘representations’), can be made via the consultation portal at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan). Alternatively, you may email your response to [cityplan@gloucester.gov.uk](mailto:cityplan@gloucester.gov.uk) or write to: Planning Policy Team, Gloucester City Council, PO BOX 3252, Gloucester, GL1 9FW.
- 1.14 Copies of this document are available at all libraries within Gloucester City, the Gloucester City Council ‘Hub’ on Westgate Street and the Guildhall.
- 1.15 Responses submitted to the consultation will be considered by an Independent Planning Inspector at a public examination. The role of the Inspector will be to examine whether the GCP is ‘sound’ and complies with the legal requirements. More information on the examination procedure has been produced by the Planning Inspectorate and is available from their website.
- 1.16 If you wish to make a representation seeking a change to the GCP, in your response you should explain why the Plan is not sound and/or legally compliant. Where possible you should provide evidence to support your representation and make clear what changes need to be made as a result.
- 1.17 Please note that your representation cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations will be made available on the Council’s website. Your name and organization (if applicable) will be viewable. However, your contact details will be removed. If your representation is anonymous it cannot be taken into account.

## What happens next?

- 1.18 Once the Pre-Submission consultation has ended, the responses and other required documentation will be submitted to the Planning Inspectorate. The timing of this will depend on the number of responses received to the consultation but it is expected this will happen before the end of 2019.
- 1.19 As many of the strategic planning issues have already been addressed through the adopted Joint Core Strategy, it is hoped that the examination process for the Gloucester City Plan will not be lengthy; however, the exact timescale cannot be defined.

## Structure of the Plan

- 1.20 The GCP is structured as follows:
- Section 1: Introduction and overview of the GCP, it's wider links with the JCS;
  - Section 2: Vision and key principles;
  - Section 3: Development Management policies, organised under key themes such as 'housing' and 'healthy communities';
  - Section 4: Site allocations;
  - Section 5: Monitoring framework;
  - Section 6: Strategic policy schedule;
  - Section 7: Superseded policies (from the adopted 1983 Gloucester Local Plan); and
  - Section 8: Glossary of terms.

## 2. PLANNING FOR GLOUCESTER

### Context

2.1 The Gloucester City Plan (GCP) delivers the Joint Core Strategy (JCS) locally and addresses local issues and opportunities. The City Plan Vision statement and key principles been informed by the Council Plan (2017 - 2020), City Vision: A City ambitious for its future and proud of its past (2012 – 2022), other relevant strategies and plans, as well evidence around the issues and opportunities that exist in the city. In terms of the latter, the following ‘portrait’ provides a summary.

#### **Gloucester today, Gloucester tomorrow – A portrait of the city**

2.2 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 near Gloucestershire, Bristol, Birmingham and Cardiff airports.

2.3 The city’s population in 2018 was estimated to be 129,285 and is growing year on year<sup>1</sup>. Gloucester will experience the greatest population growth of all the district authorities 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.

2.4 The population of Gloucester is relatively young with 24.8% of the population being under the age of 19, the highest of all Gloucestershire districts, the South West and UK. This is set to increase with the number of children and young people predicted to grow by over 16.4% between 2010 and 2035<sup>3</sup>. By 2035 Gloucester is expected to have 6,000 people over the age of 85. The GCP 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.

2.5 There are around 5,690 homes in Gloucester<sup>4</sup> and recent evidence shows there has been significant growth in new homes. The city needs over 14,300 new homes between 2011 and 2031. Almost half of these new homes will be provided in locations on the edge of the city, outside of the City Council’s administrative area. However, 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 and, given the limited amount of developable land, it has been necessary to consider all possible development sites on both greenfield and brownfield land and to ensure that the very best use is made of these sites.

2.6 Most homes in the city are owner-occupied<sup>5</sup>, the 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

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<sup>1</sup> NOMIS Mid-2018 Population Estimates, Office for National Statistics

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

<sup>3</sup> Ibid

<sup>4</sup> Centre for Cities

<sup>5</sup> ONS, Town and Cities, 2011 Census

Westgate. Privately rented homes are most common in Westgate, Kingsholm and Wotton and Barton and Tredworth. It is important a mix of new homes is delivered to meet the needs of our communities.

- 2.7 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>6</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>7</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>8</sup>. The city has a substantial stock of employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land, as well as identifying new employment opportunities where possible.
- 2.8 Tourism also forms a very important component of the city's economy, generating around 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. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events<sup>9</sup>. The Docks and canal is one of Gloucester's unique assets and is a major tourist destination, but which could be capitalised on further, particularly use of the waterspace<sup>10</sup>
- 2.9 The city has a strong regeneration programme within the city centre. This has seen the delivery of a new transport hub and plans are afoot for the redevelopment of the wider King's Quarter area to provide a range of different uses and a substantially improved arrival into the city centre. The Regeneration and Economic Development Strategy (2016 – 2021) 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.
- 2.10 Gloucester city centre is performing fairly well with a good range of shops, services and facilities. 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 types of product, particularly fashion / clothing, and that there are a limited number of independent retailers<sup>11</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>12</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 complement and not compete with or undermine the city centre.

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<sup>6</sup> Gloucestershire Strategic Economic Plan (SEP) March 2014

<sup>7</sup> Ibid

<sup>8</sup> Gloucester Regeneration and Economic Development Strategy, 2016 - 2021

<sup>9</sup> Gloucester's Cultural Vision and Strategy, 2016 - 2026

<sup>10</sup> Gloucester Waterspace Strategy (2019), Canal and River Trust

<sup>11</sup> Joint Core Strategy Retail Study: Phase 1, 2011

<sup>12</sup> Joint Core Strategy Retail Study 2015, February 2016

- 2.11 There are pockets of significant deprivation in the city and in some cases, these are worse 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, suicide and attempted suicide, 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.
- 2.12 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>13</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 GCP are to set the framework for the Council to work positively with the local education authority 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.
- 2.13 Gloucester is actively engaged in sport and has many sports clubs, particularly in football, rugby union and cricket, but with growing participation in rugby league, American football, Gaelic football and gymnastics<sup>14</sup>. Overall, participation in formal sports is increasing. There are a large number playing pitches and sporting facilities - but there are shortages in some areas. Evidence shows that many playing fields and sports facilities are poor quality but have been improving<sup>15</sup>. An expanded multi-sports hub has recently been completed in the north at Oxstalls Sports Park and the University of Gloucestershire, including two full-sized 3G artificial surfaces and a large indoor sports hall with stadium seating. The City Council is also working with partners to bring forward a further sports and community hub at 'Blackbridge' in Podsmead.
- 2.14 Car ownership and car use continues to dominate, and there are significant congestion issues on some roads, particularly at peak hours<sup>16</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. A new modern bus station has recently been delivered as part of Phase 1 of the King's Quarter regeneration project. Funding has also been secured through the Local Enterprise Partnership for substantial improvements to the adjacent railway station; this will have a positive impact in encouraging people to use alternative forms to transport to the private car. There is also a lack of cycle lanes between Gloucester and Cheltenham. It is important that the GCP, together with the JCS, creates a positive framework that supports the delivery of the Gloucestershire Local Transport Plan<sup>17</sup> and a move towards increased use of more sustainable modes of transport.
- 2.15 There are 48 formal play areas in Gloucester 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, both in terms of quantity and quality<sup>18</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

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<sup>13</sup> NOMIS official labour market statistics

<sup>14</sup> Gloucester Playing Pitch Strategy (2015 – 2025), Gloucester Built Sports Facilities Strategy (2019)

<sup>15</sup> Gloucester Playing Pitch Strategy, 2015 - 2025

<sup>16</sup> Draft Local Transport Plan, 2015 – 2031, Gloucestershire County Council

<sup>17</sup> Ibid

<sup>18</sup> Gloucester Open Space Strategy, 2014 - 2019

in visitor numbers. As the population of the city grows it is important to protect open spaces and further investment will be required to improve open space facilities and reduce recreational damage from increased usage.

- 2.16 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 major positive 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 GCP contain policies that will require new development to be designed in ways that promote the use of sustainable transport, exploit all viable options for providing renewable energy, provide tree planting, create and connect to public open spaces and multi-functional green infrastructure, make use of Sustainable Urban Drainage Systems and opportunities to improve flood risk and manage it better, and to deliver improvements and net gains to biodiversity.
- 2.17 Gloucester is characterised by the River Severn, which runs along the western edge of the city and there are various tributaries that run into it. As a result, some areas 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.
- 2.18 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. Heritage is a central component in the identity of Gloucester and defines much of what is locally distinctive and 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 and the health and wellbeing of residents, as well as providing distinctive character and landmarks. The Gloucester Heritage Strategy (2019) sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.

## Vision

- 2.19 Taking all the above into account, the Gloucester City Plan Vision is as follows:

**Between 2011 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 and green spaces, woods and trees, 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.**

## **Key principles**

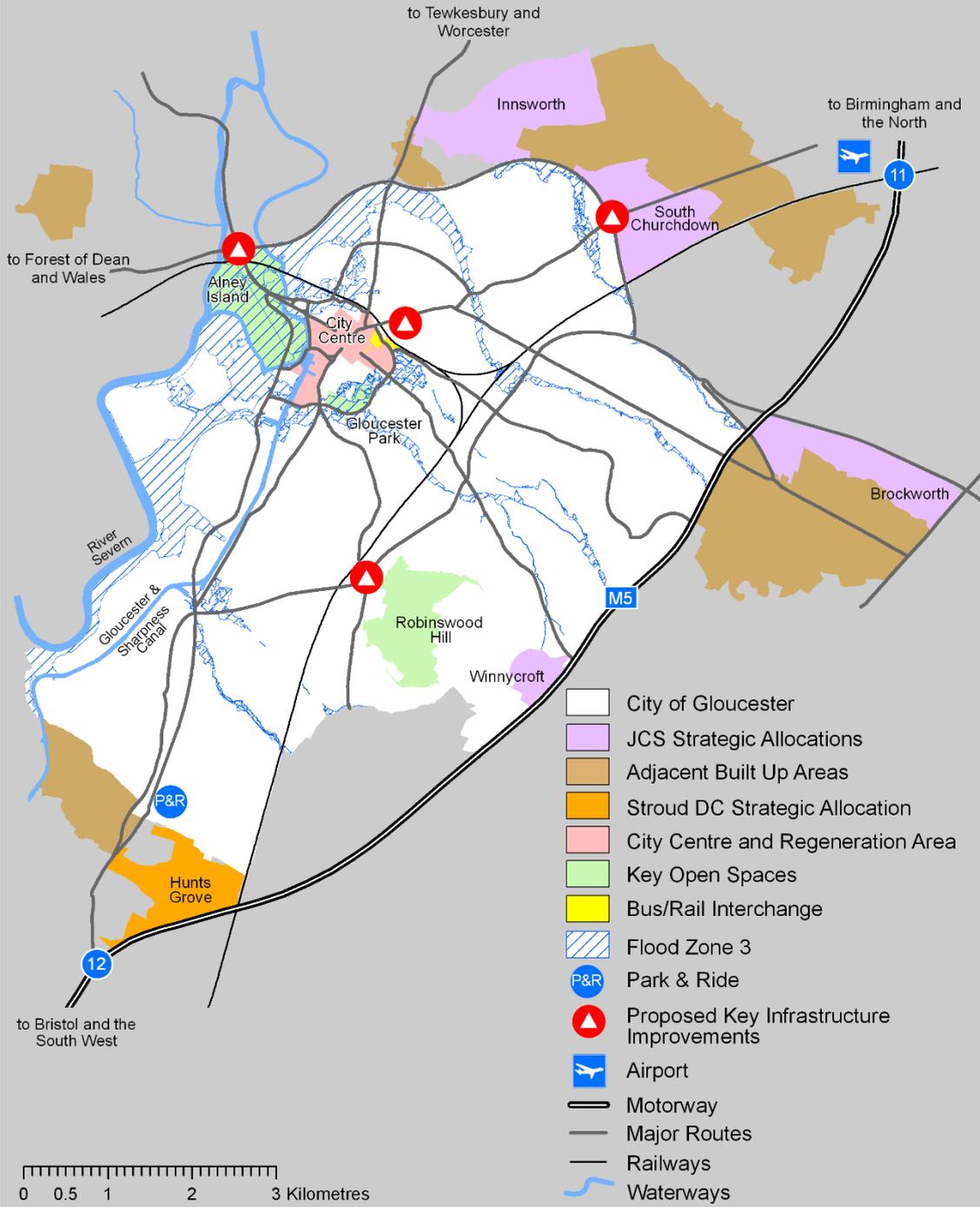
To deliver the City Plan Vision, the following key principles have been identified. These feed into each of the policies and ensure they meet the Vision.

- 1. Ensure that new 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 the reuse of vacant buildings.**
- 2. Ensure that new development is supported by the necessary infrastructure.**
- 3. Regenerate and develop the city centre and other areas of the city in a way that responds to and meets the needs of the 21<sup>st</sup> century and builds on strengths such as heritage and the waterside location.**
- 4. Build on existing strengths to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer.**
- 5. Encourage a vibrant and safe evening and night-time economy that appeals to all age groups and interests and encourages more overnight visitors.**
- 6. Provide a balanced mix of new homes that provide for the needs and aspirations of existing and future communities.**
- 7. Encourage and facilitate inward and homegrown investment, attract innovative growth sectors, create high and stable levels of economic growth and productivity, and increase jobs and skills development opportunities.**
- 8. Improve educational attainment, skills and learning opportunities.**

- 9. Protect and enhance the city's leisure, recreation and environmental assets, including the historic environment, public open spaces, woods and trees, allotments, areas of nature conservation, sensitive landscapes, playing fields and sports facilities.**
- 10. Deliver development that achieves high quality design and layouts that integrates new and existing communities, reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable city.**
- 11. Ensure that development responds, mitigates and minimises its impact on climate change through sustainable design and construction, addressing flood risk and encouraging the use of sustainable forms of transport, making the most of existing infrastructure.**
- 12. Improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities.**
- 13. Tackle poverty and deprivation and the worst affected areas of the city.**

The following key diagram shows Gloucester City within the context of JCS growth and key constraints.

# Key Diagram



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# 3. DEVELOPMENT MANAGEMENT POLICIES

## A: HOUSING

### Introduction and context

- 3.1.1 There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucester is certainly not immune from this major social and economic issue. Gloucester's population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighboring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, through the policies and allocations in City Plan it is important that every opportunity is taken within the city and every remaining suitable site provides for a range of suitable housing to meet a variety of needs.
- 3.1.2 When people have decent, affordable and secure housing this acts as a foundation for healthy and happy communities and stable family lives. Ideally good housing needs to be close to schools, healthcare and public transport links. Good housing improves environmental and economic wellbeing and helps to create stronger communities and places that can act as a draw to investment and skilled workers.
- 3.1.3 The policies in this chapter specifically reflect City Plan Key Principles 1, 3, 6 and 10. City Plan aims to create a policy framework whereby the needs of all types of households are met. The plan seeks to support families, single people, students, self-builders, the elderly and those with disabilities or particular special needs. Based on the NPPF, Policy A1 provides the overall driver which seeks to use land and buildings effectively and efficiently. If this is achieved, then there is a greater prospect of a. achieving higher densities which will increase the supply of homes and b. protecting and preserving sites which need to be protected for their natural environmental value.

### Policy A1: Effective use of land and buildings

**Proposals are required to make effective and efficient use of land and buildings. Development proposals should:**

- 1. Result in overall improvements to the built and natural environment; and**
- 2. Be of a suitable scale for the site and not have a significant adverse impact on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of the neighbouring properties; and**
- 3. Not lead to a saturation of intensified properties within the area; and**
- 4. Provide adequate off-street parking, access, covered and secure cycle storage which provides for the existing and proposed use; and**
- 5. Not prejudice the potential for the comprehensive development of adjacent land; and**

- 6. Provide outdoor amenity space and garden space at a level that reflects the character of the area and the scale of the development; and**
- 7. Provide adequate, well designed, appropriately located and accessible bin storage areas.**

**Mixed-use developments and the re-use of vacant floors above commercial premises will be supported where it can be demonstrated that the uses are compatible and will result in safe and healthy living conditions.**

- 3.1.4 Gloucester is a growing city which is constrained by several physical boundaries. Land is a precious resource and it is imperative that development maximises the number of homes and jobs provided, whilst safeguarding and improving the built and natural environment, and creating safe and healthy living conditions.
- 3.1.5 The National Planning Policy Framework (NPPF) encourages local authorities to make the most effective use of land in meeting the need for new homes and other uses. More specifically, the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, planning policies should avoid homes being built at low densities, developments make the optimal use of each site and that authorities consider the use of minimum density standards for city and town centres and other locations that are well served by public transport.
- 3.1.6 When considering the potential capacity of site allocations within the GCP, the City Council has identified those sites where higher densities are more appropriate in respect of their location and character. These are near the bus and rail interchange and within or adjacent to the city centre. Elsewhere, the indicative capacity has been determined based on a higher-level suburban density consistent with locations within the main urban area and in accordance with the Strategic Assessment of Land Availability (SALA) methodology.
- 3.1.7 However, it is not considered appropriate to set minimum densities for Gloucester City. This is because of the sensitive historic context within this area, with over 700 Listed Buildings and almost total coverage by different Conservation Areas, each with its own special character and distinctiveness. The most appropriate approach therefore is for applications to seek the most efficient use of land on a case-by-case basis, in the context of its location and character.
- 3.1.8 Developments will contribute to overall improvements to the built and natural environment of the city, including where appropriate its heritage. This includes ensuring that the scale of the development is befitting of the site and its wider locality and not cramped, awkward or 'squeezed' in appearance. This can be achieved by a proper site analysis and full understanding of the character of the area. In this regard, the Gloucester Townscape Character Assessment (2019) will be a particularly important consideration in determining appropriate densities and forms of development.
- 3.1.9 To increase density developers are encouraged to move away from smaller homes on smaller plots with less storage and amenity space, as this approach can often result in a cramped appearance and reduce mental wellbeing. Developers are encouraged to consider a range of innovative products and solutions that can compete with standard housing products. This could include apartments that are designed to be more desirable than a standard sized two- or three-bedroom house. This could be achieved by providing a higher

quality of living environment through maximising natural light, which can provide views and a feeling of space and mental wellbeing, useable balconies, higher ceiling heights, increased storage, larger room sizes, additional reception or bedroom spaces, excellent standards of sound insulation, and architectural design that is more appealing than a standard two or three bedroom house. Three or more-bedroom apartments are encouraged and may appeal to smaller families and 'down-sizers' freeing up valuable family homes. An additional bedroom is often appealing to down-sizers as it allows for carers, visitors, or hobbies and interest to be pursued.

- 3.1.10 Improvements to the natural environment will be proportionate to the scale of development and could range from SUDs systems that extend the Green Infrastructure network to smaller scale biodiversity support and habitat creation through green roofs, tree planting, bat boxes, bird boxes and the like.
- 3.1.11 Within the city Centre evidence points to many vacant floors above the commercial uses that operate at ground floor level. These vacant floors represent an opportunity for conversion to active uses including residential and office increasing the number of people living in the city centre and bringing back into positive use heritage assets. Residents and workers in the city centre create activity and help to support its viability and vitality. This enlivens the area and helps to reduce crime and the fear of crime by providing natural surveillance, particularly in the evenings.
- 3.1.12 Where it is proposed to intensify an existing building (by conversion into flats or large House in Multiple Occupation) it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area including its character. When assessing whether a proposed intensification of a dwelling would impact the character of the area consideration will be given to the number of existing of intensifications in the area. Applications that would result in a saturation of family homes converted into flats or HMOs will not be permitted. Saturation is deemed to be reached if:
1. It would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or
  2. Intensified properties represent more than 10% of households within a 100-metre radius of the application property.
- 3.1.13 Careful consideration will be given to the design and location of the proposal as well as to amenity space, parking, servicing and access arrangements. Any residential development, including the intensification of an existing dwelling, will be required to provide a suitable housing mix in accordance with SD11 Housing Mix and Standards of the JCS.
- 3.1.14 The City Council operates 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.
- 3.1.15 Good design is necessary in this area to encourage use of the service, to aid refuse collection, maintain a visually attractive streetscene and to ensure that the highway is kept safe and free from obstruction. It is important that bin storage is accessible but also discreet and not located directly under openable windows. Communal collection facilities for new streets are aspirational as this can often take up less space and make bin storage more discreet.

## Policy A2: Affordable Housing

**On residential sites of 10 dwellings or more, or sites with a gross site area of 0.5 hectares or more, 25% affordable housing is required on all residential sites within Gloucester City.**

**The City Council will support grant aided schemes that deliver greater than 25% affordable housing, and tenure and house types, that meet the city's needs. The occupation of affordable housing will be limited to people in need of affordable housing and shall be secured in perpetuity.**

**Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the pro-rata percentage of affordable housing sought will apply to the larger area as a whole.**

- 3.1.16 Gloucester has a significant need for more affordable homes. JCS Policy SD12 sets out the overarching strategic policy position; 'Outside of the strategic allocations, on sites of 11 dwellings or more, or sites with a maximum combined floorspace of greater than 1,000 sq m; a minimum of 20% affordable housing will be sought on developments in Gloucester City...' This policy reflects the fact that the evidence underpinning the JCS identified value areas within which different levels of affordable housing could be achieved. This evidence has been strengthened through the Viability Appraisal prepared in support the GCP, and this demonstrates that a 25% figure can be supported residential developments in the city. Please note that since the JCS was adopted, the Government has amended the affordable thresholds as reflected in the policy above.
- 3.1.17 Affordable housing is defined within the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), including (a) affordable housing for rent (b) starter homes (c) discounted market sales housing (d) other affordable routes to home ownership such as shared ownership.
- 3.1.18 In accordance with the adopted JCS, affordable housing should be provided on-site and seamlessly integrated and distributed through the development scheme. Developments should also include a balanced mix of dwelling sizes, types and tenures to meet the future housing needs of the area, and the design and price of homes should ensure they are genuinely affordable and fit for purpose.
- 3.1.19 The density, layout and type/tenure mix of a site can impact on viability and therefore the ability to deliver affordable housing. Applicants should design schemes to ensure the most efficient and effective use of land, whilst being consistent with other policies in the JCS and GCP, for example in relation to design and heritage.
- 3.1.20 In exceptional circumstances where an applicant may be able to provide robust evidence to demonstrate an inability to meet the affordable housing requirement, evidence must be provided in the form of a viability appraisal. This will be independently assessed for the City Council by a third party and this will be paid for by the applicant. Clarity as to the particular circumstances that have given rise to the development's reduced viability or non-viability

will be established through either an open-book valuation or through an independently commissioned assessment using the Homes and Communities Agency 'Development Appraisal Tool' or other equivalent tools, to be agreed with the City Council in advance of the assessment.

- 3.1.21 Where it can be demonstrated through viability that a development cannot support the required 25% affordable housing, the applicant is expected to seek, in accordance with JCS Policy SD12, public funding or other public subsidy in order to support the required level of affordable housing. Equally, the applicant should consider the mix and design of a scheme (whilst according with other relevant policies in the JCS and GCP) in order to reduce costs and maximise the delivery of affordable housing.
- 3.1.22 The City Council will support schemes that deliver levels of affordable housing greater than 25%, through public subsidy or other mechanisms.
- 3.1.23 In some circumstances, vacant building credit may apply to developments that would bring vacant buildings on a site back into lawful use, or where such buildings are demolished as part of a development. If the site in question is eligible, this would reduce the expected affordable housing contribution from a site.

### **Policy A3: Estate regeneration**

**There is a general presumption to support the regeneration of housing estates where the following criteria are met:**

- 1. The physical condition of the housing stock is poor (i.e. the dwellings are substandard, or demonstrably not fit for purpose in the short-medium term); and/or**
- 2. There is an area-specific socio-economic justification for re-development led regeneration, considered alongside alternative options for re-modelling or refurbishment;**

**If the criteria above are met, proposals must then meet the following:**

- 3. The proposal has been properly master-planned; and**
- 4. The existing strengths of the locality, both the built and natural environment and the community assets, are identified and positively improved upon as part of any regeneration; and**
- 5. The local community has been actively engaged in shaping the proposals; and**
- 6. The proposal provides suitable type and tenure housing choices to meet the needs of existing residents and the needs of the wider city; and**
- 7. The proposal promotes strong and thriving communities by providing community facilities, open spaces, retail and other economic opportunities at an appropriate level to meet the needs of the existing and expanded community; and**
- 8. The proposal can demonstrate that development led regeneration delivers positive socio-economic benefits for existing residents; and**
- 9. The proposal helps to maintain and promote independent living and improves health and well-being.**

- 3.1.24 There are several former local authority housing developments in Gloucester of varying age. The City Council supports the regeneration of housing estates such as these where it can be demonstrated that the physical condition of this housing stock is considered not fit for purpose and alternative options have been robustly considered. Any redevelopment to provide new accommodation must meet the needs of existing and future residents and, as with all other planning applications, be compliant with other policies within the JCS and GCP.
- 3.1.25 These established housing areas often have existing assets both in terms of the built and natural environment, but also in terms of residents and the communities they have created. It is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods and the communities involved. The council would encourage the use of independent community advisors and community builders throughout the process.
- 3.1.26 The redevelopment of affordable housing provides an opportunity to improve community infrastructure, health and wellbeing, and access to jobs and services.
- 3.1.27 The City Council is in the process of preparing Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs provide additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications.

## **Policy A4: Student accommodation**

**Proposals for new purpose-built student accommodation must satisfy the following criteria:**

- 1. The proposal will provide for an identified need of a further educational establishment located in Gloucestershire, for students attending full time courses for one academic year or more; and**
- 2. The developer has entered into a formal agreement with the further education establishment; and**
- 3. The proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution(s); and**
- 4. The location is well served by sustainable transport modes; and**
- 5. Rooms and facilities are of an appropriate size for living and studying.**

**The Council will seek appropriate controls to ensure that, within academic terms, the approved schemes are occupied solely as student accommodation for identified institution(s).**

**Proposals for purpose-built student accommodation will not be supported on sites allocated for housing elsewhere in the GCP.**

**The permanent loss of purpose-built student accommodation will only be supported where it can be demonstrated that the accommodation is surplus to the current and future requirements of relevant further education establishments, or equivalent or better replacement provision is made in a suitable location.**

- 3.1.28 Gloucester City has a strong presence from further educational establishments; namely the University of Gloucestershire, the University of the West of England and Gloucestershire Royal Hospital. Hartpury College and University is also located a short distance to the north of the city.
- 3.1.29 The City Council is keen to support the growth of these establishments, and others should they choose to locate campuses within the county, and recognise the important contributions that students living in the city make to the local economy. At the same time, over recent years the Council has received speculative planning applications for student accommodation that have not since come forward.
- 3.1.30 In support of the GCP, consultation with the current further educational establishment has been undertaken to understand current and future needs for purpose-built student accommodation. It concludes that current built supply of accommodation, plus an element of those units with planning consent, are adequate to provide for current needs, and those anticipated in the short to medium term.
- 3.1.31 The Council is keen to ensure that the best possible use of made of its finite land supply and will support planning applications for new purpose-built student accommodation where there is a proven need and it would deliver a quality living environment for future students. For the same reason, the Council is keen to protect from the loss of existing student accommodation to alternative uses. In support of planning applications, applicants will be expected to provide written evidence from the further education establishment, demonstrating the need the proposal would provide for, as well as evidence of a formal agreement between the developer and that further education establishment.
- 3.1.32 Outside of term time, student accommodation can provide an important source of accommodation in support of tourism, events and festivals. The City Council strongly supports the use of purpose-built student accommodation in this way.

## **Policy A5: Specialist housing - Housing choice for older, frail and disabled people**

**Development proposals for specialist housing must be:**

- 1. Supported by evidence of the demonstrable need for this form of housing within Gloucester City;**
- 2. Suitable for the intended occupiers in relation to the affordability, quality, design and type of facilities with, if appropriate, the provision of support and/or care supported by a sustainable business model;**
- 3. Accessible to local shops and services, public transport and community facilities appropriate to the needs of the intended occupiers; and**
- 4. In a location that avoids excessive concentration of such housing within any one street or small area.**

**Where the development falls within use class C3 (dwelling houses), the development will be expected to contribute to the supply of affordable housing within Gloucester in accordance with Policy A2.**

**If development, including change of use, would involve a net loss of specialist residential floorspace, this will only be permitted where appropriate replacement specialist housing accommodation will be made that satisfies the above policy or it is demonstrated that there is no local need for the floorspace to be retained for the current or last use.**

3.1.34 The UK has an ageing population and meeting the needs and aspirations of older, frail and disabled people is a priority. National and locally there is evidence that such housing should focus on the provision of well-designed adaptable, care-ready, HAPPI, general needs accommodation that meets identified needs and is suitable in terms of location, design and affordability. The accordance with the JCS, the City Council expects applications to support the delivery of inter-generational living and mixed and balanced communities in the city.

3.1.35 Specialist housing is defined as housing designed and designated for occupation by older people, disabled people, and vulnerable people with specific housing needs. Such provision will include an element of care and support needed to allow residents to live as independently as possible. Specialist housing includes the following types of provision:

- Sheltered housing
- Residential care and nursing homes
- Extra-care housing
- Shared homes
- Cluster units
- Respite, rehabilitation and convalescent accommodation
- Hostel accommodation.

3.1.36 The council will work closely with Social and Health Care commissioners to assess needs and develop strategies that will help inform development proposals. Early engagement with relevant commissioners by developers is essential to ensure there is a need for the form level and type of accommodation proposed.

3.1.37 Design is a critical element of any development or dwelling housing but has a particular relevance to specialist housing and older persons' housing: for example, space and flexibility, daylight in the home and in shared spaces, balconies and/ functional high-quality outdoor space, adaptability and 'care ready' design. Proposals for specialist housing will be expected to reflect existing and or emerging best practice in relation to the proposed occupants.

3.1.38 Older persons households, and disabled persons households often have a limited income. Therefore, applications will need to demonstrate how the housing costs and related service charges are sustainable in relation to local earnings and incomes of the specific group for which the housing is designed. A scheme's eligibility to be treated as 'exempt accommodation' for Local Housing Allowance purposes is not an indication that the provision is affordable housing, merely that the residents housing costs are benefit supported. Consideration will need to be given to future needs of residents and whether benefit dependency undermines longer term personal development, care, or housing needs.

3.1.39 Given that specialist housing often provides housing for vulnerable persons, the safeguarding of their health and wellbeing is a key issue. Proposals will need to demonstrate that the landlord and service providers are either on a relevant procurement framework and/or can demonstrate that they are a fit and proper organisation to deliver the proposed

scheme. Legal agreement will allow for the substitution of landlords or service providers whose business model risks long term delivery of the housing or the support/services, or the management of the scheme or provision of support/services are deemed inadequate by the Council and /or Social /Health Care commissioners.

## Policy A6: Accessible and adaptable homes

**In order to create accessible homes that meets the needs of an aging population, frail and disabled persons, and to meet the City Council’s duty under the Equalities Act, the following accessible and adaptable homes standards will be met:**

- 1. 50% of housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’ to be met; and**
- 2. 4 (four) % of the affordable housing component of every housing development should meet Building Regulations requirement M4 (3) ‘wheelchair user dwellings’ to be wheelchair accessible or be easily adapted for residents who are wheelchair users.**

- 3.1.40 Accessible homes support the changing needs of residents from raising children through to mobility issues faced due to frailty, old age or through disability. The standards allow people to live independently maintaining their health and wellbeing for as much of their life as possible, either in their existing home or in alternative accommodation to meet their changing needs and aspiration within their neighbourhood or local area. This helps to promote safe, accessible environments that promote inclusion and community cohesion.
- 3.1.41 Homes built to M4 (2) standards have design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs or enable future adaptation to accommodate this diversity of use.
- 3.1.42 The National Planning Practice Guidance states that local plan policies for wheelchair accessible homes (M4 (3)) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. In the interest of mixed and balanced communities, the Council would also encourage developers to build wheelchair accessible market homes, and Policy A7: Self build and custom build homes also supports provision of such homes.
- 3.1.43 Developers of Specialist Housing may wish to increase the level of M4(3) category homes to reflect the needs of the intended occupants.
- 3.1.44 Compliance with the criteria should be demonstrated in the Design and Access Statement submitted with the planning application and conditions will be applied to any consent granted to ensure the standards are complied with.

## Policy A7: Self build and custom build homes



**For all housing sites\* either allocated in this plan or which come forward as windfall developments, and which comprise 20 or more dwellings, a minimum of 5% of the net developable area shall be set aside as serviced plots. The serviced plots shall be offered for sale to self and custom builders, subject to demand being identified on the Council's Self & Custom Build Register.**

**Self and custom build plots which come forward through this policy shall be made available and appropriately marketed for a minimum of 12 months from grant of planning permission. Marketing should be directed at those on the Council's Self and Custom Build Register as well as the general public. If, after a 12-month period, the plots have not been sold it will be for the developer to consider whether the plots continue to be marketed as self / custom build opportunities or if they will be built out by the developer. Evidence of sustained marketing will need to be submitted to the Council.**

**Elsewhere, windfall sites for self-build and/or custom build housing will be supported where they meet other policies within the JCP and GCP.**

**\* Excluding sites and applications for flats/apartments.**

- 3.1.45 Self-build housing is where the individual or group has a high degree of autonomy and involvement in house design and construction. Custom-built housing involves an individual or a group commissioning specialist such as architects and/or builders to assist with the project.
- 3.1.46 The Self-Build and Custom Housebuilding Act 2015 requires the Council to keep, and have regard to, a register of people who have expressed an interest in self-build / custom build projects in the Local Authority area. Based on evidence of demand from the Self and Custom Build Register, the Act also requires the Council to put in place policies to support the delivery of planning permissions to meet the demand.
- 3.1.47 Developers are expected to liaise with the Council to ensure that plots available for self and or custom build are marketed to those on the register as well as to the general public.

## **Policy A8: Static caravan sites**

**Existing static caravan sites shown on the policies map are protected for their current use and proposals for alternative development on these sites will not be supported, unless it can be demonstrated the need for this form of accommodation no longer exists.**

- 3.1.48 For some people living in a static caravan is a choice and a way of life 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 A9: Extensions to existing dwellings

**Well-designed extensions of residential properties, and/or the erection of outbuildings incidental to the enjoyment of the dwelling, will be granted planning permission where they satisfy all of the following criteria:**

- 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. Proposals that result in an inappropriate increase in the scale, form or footprint of the original building will not be permitted; and**
- 2. The height, size, design and the external facing materials of the extension or outbuilding are in keeping with the scale and character of the existing dwelling and its wider setting; and**
- 3. The living conditions of neighbouring occupiers are not unduly harmed by the proposal as a result of overlooking, overshadowing, or overbearing development.**

3.1.49 A well-designed home 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.

3.1.50 The City 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.

3.1.51 Further guidance can be found in the Supplementary Planning Document 'Home Extension Guide' and any subsequent iteration.

## Policy A10: Annexes to existing dwellings

**Annexes to existing dwellings will be granted planning permission where it can be demonstrated that there is a clear need to accommodate a relative, dependant or full-time carer and the proposal meets the following criteria:**

- 1. There is a functional link with the principal dwelling; the accommodation provided within the annexe is ancillary and there remains a reliance on the connection with the main dwelling; and**
- 2. Is of a subservient design and scale to the existing dwelling; and**
- 3. Is in the same ownership as the principal dwelling; and**
- 4. There will be no boundary demarcation or sub-division of garden areas between the proposed annexe and the principal dwelling.**

3.1.52 Residential annexes are a common form of development that allows a relative or dependent to live with their family. The accommodation is ancillary to the main dwelling and is sited

within the residential curtilage. The resident of the annex should be clearly associated with the occupants of the principal dwelling house e.g. dependent relatives or domestic staff working for the residents of the principal dwelling. The annex should form part of the same “planning unit” by sharing the same access, parking area and garden.

- 3.1.53 The City Council will normally seek to add a planning condition to any permission to secure its continued use as an annex ancillary to the main dwelling. This is in order to avoid the development being later used by an unrelated occupant or as an independent dwelling.
- 3.1.54 Concerns can exist in respect of flood risk to vulnerable occupiers of ground floor annexes proposed in Flood Zones 2 and 3. Where there is no internal door linking an annex with the rest of an existing house a Flood Risk Assessment appropriate for a new dwelling will be needed to assess flood risk to occupiers of the annex.

# B: EMPLOYMENT DEVELOPMENT, CULTURE AND TOURISM

## Introduction and context

- 3.2.1 Gloucester has a strong a strong, diverse and growing economy, being the main economic driver in Gloucestershire, along with Cheltenham. Overall, the Gloucester economy supports 68,000 jobs and 3,425 businesses. Key sectors include manufacturing, energy, finance and insurance services and overall, the City has high rates of economic participation. Evidence shows that the city has a good range of different types of employment sites, supporting a diverse economy and with high occupancy rates.
- 3.2.2 Limited land supply within the administrative area of the City Council means that the strategic growth must take place in neighbouring authorities and the City Council must work with those authorities in realizing growth aspirations. The JCS provided an employment strategy for the JCS and strategic land release at urban extensions, aligned with the Strategic Economic Plan (SEP). It is important that the city protects existing employment land and buildings for the benefit of existing and future business, including small and medium size business (SMEs) and 'start-ups', and that opportunities are taken to support business growth and the attractiveness of employment stock.
- 3.2.3 At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets including the Docks and Canal and develop with tourist and cultural base.
- 3.2.4 These policies link with several key principles, but particularly (7) 'Encourage and facilitate inward and home-grown investment, attract innovative growth sectors, create high and stable levels of economic growth and increase jobs and skills opportunities' and (4) 'Build on existing strengths to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer.'
- 3.2.5 The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the designed centres. It covers all designed 'town centres', i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.
- 3.2.6 The policies in this section should be read in conjunction with JCS policies SP1 'The need for new development', SP2 'Distribution of new development', SD1 'Employment – Except retail development' and SD2 'Retail and City / Town centres'.

## Policy B1: Employment and skills plans

**For housing development of 10 or more units and major commercial development of 1,000 sq. m or more of new internal floorspace, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the**

**proposal and identify opportunities for the employment and skills development of local people through the implementation of the proposal.**

**The ESP should address priorities identified and agreed at an early stage through consultation with the City Council and local employment and skills agencies. The ESP will have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development.**

3.2.7 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.

3.2.8 The Gloucester Economic Growth Strategy 2019 (EGS) takes a strategic approach to encouraging employment and skills development, seeking to;

- Enable more people to enter the labour market with the skills, knowledge and attitudes required to make them employable;
- Develop a larger and more skilled workforce in line with local employer/labour market needs;
- Increase the number of apprenticeships available; and
- Help facilitate a reduction in the number of unemployed and economically inactive people of working age.

3.2.9 In terms of planning and development, the EGS seeks to:

- Insist that major regeneration schemes in which the Council has a financial interest create employment and skills opportunities for local communities and business opportunities for local suppliers.
- Require applicants seeking planning consent for major housing development and major commercial development to produce Employment and Skills Plans, identifying opportunities for the employment and skill development of local people.

3.2.10 Further guidance in relation to the preparation and implementation of Employment and Skills Plans is available on the City Council's website.

## **Policy B2: Safeguarding employment sites and buildings**

**Employment sites and buildings will be safeguarded for B class employment uses and change of use/redevelopment to non-B class uses will generally be resisted. Such proposals will only be supported where the following criteria are met:**

- a. The site or premise is redundant or no longer fit for purpose or capable of meeting employment needs; and**
- b. The proposal would not adversely impact on the viability of adjacent employment uses; or**

**c. The proposal would bring significant benefits to the local economy and/or community that would demonstrably outweigh the loss of employment land.**

- 3.2.11 Gloucester is a small urban authority with a limited supply of employment land. Evidence from the City Council's Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment sites and premises within the city, which overall meets the needs of and is attractive to the business community. The city provides a good range of different forms of employment space, from high profile business parks through to lower quality options, but which nevertheless provides the range of quality, type, size and price of accommodation to provide for the needs of businesses.
- 3.2.12 Gloucester is a primary focus for economic activity in the county and it is important this is maintained. In order to achieve this, it is important that existing sites and premises are protected from redevelopment to alternative uses. Where opportunities exist, the City Council will support proposals to intensify and improve the quality and offer of existing employment sites – see Policy B3 below.
- 3.2.13 In demonstrating compliance with criteria a) of this policy, the City Council will normally expect the submission of a Marketing Appraisal, prepared by a suitably qualified person, demonstrating that the site or premises have been marketed for a reasonable period of time, details of any expressions of interest received and expert opinion of why the site was not acquired/leased.
- 3.2.14 For the avoidance of doubt, this policy applies to all employment falling into Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) including Class B1 (a, b and c), B2 and B8. It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP.

### **Policy B3: New employment development and intensification and improvements to existing employment land**

**Proposals for new 'B' class employment development, and/or to improve the quality of accommodation, the environment and intensify the use of existing employment sites will be supported where the following criteria are met:**

- 1. Any increase in traffic can be accommodated by the existing transport network; and**
- 2. Satisfactory vehicular access, parking and maneuvering space can be provided; and**
- 3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties; and**
- 4. The scale and design of the proposal is compatible with the character of the location; and**
- 5. It would not result in unacceptable adverse environmental impacts, for example in terms of noise, air, water, soil or light pollution.**

**Proposals for limited non-B class uses will be supported where they are genuinely ancillary / complementary to the primary use of the site for B class uses. Where such**

**uses are defined as ‘main town centres uses’, they will be considered in the context of Adopted JCS Policy SD2 ‘Retail and City / Town Centres’.**

- 3.2.15 Policy SP2 of the Adopted Joint Core Strategy (JCS) identifies a need for 192ha of new employment land across the JCS area. Gloucester is a small urban authority with a finite supply of land and therefore the opportunity to allocate land within the administrative area is limited. The majority of new employment land therefore has to come forward through the adopted JCS on strategic allocations outside of the City Council’s administrative area. JCS Policy SD1 further supports employment development at locations allocated for employment development at allocated sites within Gloucester City and for the redevelopment of existing sites or the change of use from non-B class employment to B class where of an appropriate scale and character.
- 3.2.16 That said, the GCP allocates sites for additional employment land, in whole or in part, at the following locations; SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; SA21 Part of West Quay, The Docks; and SA22 Land adjacent to Secunda Way Industrial Estate.
- 3.2.17 The city’s existing employment stock makes an important contribution to the economy of the city and the wider county and region and, in light of the above, it is fundamentally important that the very best use of made of existing employment stock, whilst ensuring the impacts of doing so are adequately considered and addressed.
- 3.2.18 The City Council’s Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity and support economic growth. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.
- 3.2.19 In some circumstances additional uses within employment areas can provide an important local service within employment areas. In order to maintain the primary function of B use class employment sites, these will be genuinely ancillary to and, where constituting ‘main town centres uses’, assessed in accordance with the sequential test and impact test.

## **Policy B4: Development within and adjacent to Gloucester Docks and Canal**

**Proposals within, or adjacent to the docks and canal that facilitate accessibility and recreational use of the historic docks, waterspace and the wider canal network will be supported where they satisfy the following criteria:**

- 1. The development will not infill or reduce the depth of water of docks/canal waterspaces to the extent where it would limit the range of boats and other craft that could safely navigate and/or operate within the waterspaces; and**

2. The development would not adversely affect, and where possible enhances the historic built character, features and setting of the open waterspaces; and
3. There will be no significant adverse impact on the environmental amenity of local residents, visitors, workers or other recreational users of the waterspace; and
4. The development will not adversely affect existing, and where possible makes appropriate provision for future management and maintenance of public realm, movement routes, waterspaces and quaysides, moorings or waterway infrastructure and utilities; and
5. Development provides net biodiversity gain and facilitate its role as multifunctional green and blue infrastructure (including water quality).

**Where development could have an impact on internationally designated sites a Habitats Regulations Assessment is required.**

- 3.2.20 Gloucester Docks and the canal side is a major cultural and historic asset for the city, and already represents a major tourist attraction with the National Waterways Museum, Soldiers of Gloucestershire Museum and various festivals and events. However, the waterspace is generally underutilized and represent an opportunity to attract further investment, generate footfall within the city centre and encourage physical activity and improved health and wellbeing.
- 3.2.21 The whole of the Docks and part of the Gloucester & Sharpness canal is located within conservation areas, and within the main Docks basin, there are 14 Listed warehouses. Furthermore, the city's successful regeneration programme over recent years has resulted in the creation of a new residential and business community within the docks and wider area. It is important that increased use of the waterspaces does not lead to a significant adverse impact on local amenity or lead to an erosion of the special historic character within the area.
- 3.2.22 It is also important that land-based development does not have an adverse impact on or prevent the use of the waterspace and that new water-based activities do not impede the use of the waterspaces by boats, water craft and vessels.
- 3.2.23 Development that could come forward to support greater use of waterspaces includes, but is not limited to, the following:
- Floating pontoons for canal boat mooring, boat hire, water taxis and buses;
  - The provision of utilities and services to the quayside edge to enable/facilitate recreational activity (and reduce the reliance on generators, petrol engines, dock vehicular traffic etc).
  - Installation of stepped dockside structures to gain access at water level;
  - Feature lighting installations that assist in animating the dock and quaysides (waterspaces should remain dark);
  - Proposals that enhance the interpretation of the cultural heritage and archaeology of the historic dockland environment; and
  - Water sports activities.
- 3.2.24 Applicants are encouraged to discuss proposals with the Canal and River Trust at the earliest possible opportunity.

## Policy B5: Tourism and culture

**The City Council will support proposals that deliver the Cultural Strategy and Vision (2016 - 2026), or any future iteration. This includes proposals for the provision of new creative workspaces and for the improvement and/or extension of existing tourism, arts and cultural workspace and facilities.**

**Where the proposal includes 'main town centre uses', the applicant must demonstrate compliance with the sequential test and impact test, as set out at Policy SD2 of the adopted Joint Core Strategy.**

- 3.2.25 Gloucester has a strong and unique culture and tourism offer, with Gloucester Cathedral, the Docks, over 700 Listed buildings, Roman heritage, Gloucester Rugby, thriving festivals and events, museums and cultural venues such as the Guildhall. At the same time, it is recognized that the city lags other cities and towns of a similar size or status. In response to this, the City Council and the Gloucester Culture Trust have ambitions to build on current strengths and develop and cultural and arts offer of the city further. Further opportunity is identified in the City Council's adopted Heritage Strategy in terms of the role that the historic environment can play in underpinning the delivery of quality places, tourism and culture.
- 3.2.26 The City Council will therefore support proposals that seek to deliver the tourism and cultural offer of the city. Applicants should have regard to other relevant policies in the adopted JCS and GCP, for example in relation to development affecting designated and non-designated heritage assets and accessibility for all.
- 3.2.27 Where a proposal is for a main town centre use outside of the city centre boundary, the applicant will need to apply the sequential test and impact test in accordance with the Joint Core Strategy.

## Policy B6: Protection of public houses

**Development proposals for the redevelopment or change of use of public houses or buildings last used as public houses will only be permitted where it can be demonstrated that:**

- 1. All reasonable efforts have been made to keep the pub in viable use and it can be demonstrated that its continued use would not be feasible or practical; or**
- 2. There is an existing public house within a reasonable walking distance that meets the needs of the local community; or**
- 3. A replacement public house will be provided on part or all of the site, or within walking distance of the site.**

- 3.2.28 Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in

viable use. In order to satisfy the requirements of this policy, applicants will normally be expected to submit evidence demonstrating the following:

- a) A comprehensive sustained marketing campaign (agreed in advance by the Council) has been undertaken, offering the public house for sale as a going concern and using an agreed realistic valuation of the premises;
- b) The marketing campaign has run for a period of at least six months before the planning application is submitted;
- c) The public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents;
- d) Extensive engagement with the local community to demonstrate the acceptability of existing provision within a reasonable walking distance for the community, or alternative replacement provision.

## C: HEALTHY COMMUNITIES

### Introduction and context

3.3.1 Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle 14 of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities.

3.3.2 Most health issues have a strong preventable component that is significantly influenced by the places and spaces in which people live. For example reducing inactivity could prevent up to 40% of many common long term conditions, such as diabetes.

*“If being active was a pill we would be rushing to prescribe it. Physical activity is essential for health and reduces the risk of many preventable diseases and conditions from cancer to depression.” Public Health England, Everybody Active, Every Day (PHE, 2014).*

3.3.3 Local authorities have a statutory duty to improve the health of their residents through the Health and Social Care Act 2012. Directors of Public Health are statutory chief officers tasked with developing and supporting delivery of strategies to address local priorities to improve health and reduce inequalities. The City Council will continue to work closely with Public Health to ensure developments which contribute to the reduction of health inequalities across the city.

3.3.4 The NPPG highlights the importance of developing a healthy community which:

- Supports healthy behaviours
- Supports reductions in health inequalities, and
- Enhances the physical and mental health of the community

3.3.5 The environments in which people live, work and play influence their choices and behaviour. Planning, in being able to shape the urban environment and provide the infrastructure required for a healthy lifestyle, has a significant role to play in the creation of healthier places.

3.3.6 The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices.

### Policy C1: Active design and accessibility

**Development proposals must clearly demonstrate:**

- 1. A layout that fully accords with the principles of Active Design outlined by Sport England, or any future iteration:**

- 2. The proposal meets the highest possible standards of accessible and inclusive design, meeting the following principles:**
- i. The development can be used safely, easily and with dignity by all regardless of ability, age, gender, ethnicity or economic circumstances; and**
  - ii. The development is convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment.**

- 3.3.7 The location, accessibility, layout and design of developments have the potential to either positively or negatively impact on the extent to which people can make healthy choices and lead active lives.
- 3.3.8 Cycling and walking is often more cost effective and therefore brings opportunities for access and inclusion across a wider number of income groups. Gloucester is a relatively flat and compact city making it ideal for walking and cycling. Applicants will be expected to maximise all viable options to improve the opportunities for walking and cycling in and around proposed developments.
- 3.3.9 Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking or cycling. Developers will be required to demonstrate how their proposals accord with the 10 Principles of Active Design outlined by Sport England in ‘Active Design: Planning for Health and Wellbeing through Sport and Physical Activity’, or any future iteration.
- 3.3.10 Cycle parking, cycle storage, accessibility and walking distances shall meet the guidance provided in Manual for Gloucestershire Streets 4th Edition and any subsequent amendments from County Highways.
- 3.3.11 Good design should reflect the diversity of people who use it and not impose unnecessary barriers of any kind. People of all ages, genders, ethnicity, economic circumstance, those with both physical and learning disabilities in our community should be able to access and feel safe in all new developments. This includes extensions to all public buildings and the design and layout of public open spaces and playgrounds.

## **Policy C2: Allotments**

**Existing allotments are protected from redevelopment to alternative uses, unless alternative provision is made by the developer, of equivalent or better quality, in an accessible and appropriate location to the community where the loss would occur.**

**Provision of new allotments will be supported where there is demonstrable need to do so.**

- 3.3.12 Gloucester is a small urban authority with an increasing population and finite land supply. Allotments are an incredibly important resource, supporting local food growth, physical

activity and health and wellbeing. It is therefore important to protect against the loss of city 's existing allotments sites, which are well used and for which there is a waiting list.

- 3.3.13 Opportunities for new allotments are limited, however where demand arises and the proposal is in a suitable location, they will be supported by the City Council.

### **Policy C3: Public open space, playing fields and sports facilities**

**Existing public open spaces, playing fields and built sports facilities will be protected from redevelopment to alternative uses, in whole or in part, unless it can be demonstrated that:**

- 1. There is an excess of provision in the local area, there is no current or planned future demand for such provision and that there would be no overall shortfall; or**
- 2. The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; or**
- 3. The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; or**
- 4. The proposal affects land that is not suitable, or incapable, of forming an effective part of the open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.**

**The need for new open space and playing fields within new development will be determined in accordance with the aims and recommendations of the City Council's Open Space Strategy and Playing Pitch Strategy.**

**Development proposals to enhance or provide new open spaces, playing fields or built sports facilities will be supported where they deliver the aims and recommendations of the Council's Open Space Strategy, Playing Pitch Strategy and Built Sports Facilities Strategy, or any future iterations.**

- 3.3.14 Gloucester is a small urban authority with an increasing population, increasing participation in sports and physical activity and finite land supply. This will further increase with population growth through the delivery of new homes. The Council's Open Space Strategy, Playing Pitch Strategy and Built Sports Facilities Strategy identify the need to:

- Protect existing site from alternative uses;
- Make the best use of existing spaces and facilities should be made through improving quality and facilities to provide for the needs of communities and;
- Where possible, require new provision through new development to provide for the needs of new residents.

- 3.3.15 At the same time, evidence shows that Gloucester has higher levels of inactivity than the national and regional averages (Sport England Active Lives 2017 – 2018) and, unsurprisingly, higher levels of health issues as a result. There is an opportunity within the city therefore to increase participation in formal sports and physical activity more generally.

- 3.3.16 Policy INF4 of the Joint Core Strategy sets out that where new residential development will create, or add to, a need for community facilities, including open space, it should be met as on-site provision and/or as a contribution to facilities or services off-site. In satisfying this requirement, applicants should have regard to the aims if recommendations of the strategies identified in the paragraph above. Normally, new on-site open space will be expected on sites of 35 homes or greater.
- 3.3.17 To achieve this, the site allocations within this plan identify specific opportunities for new provision where there is a shortfall in quantity, quality and accessibility, namely;
- Land rear of St Oswalds Retail Park;
  - Land at Great Western Road Sidings; and
  - Land at The Wheatridge (should it come forward for residential development)
- 3.3.18 Furthermore, site allocation SA06 allocates land at ‘Blackbridge’ in Podsmead for a sports and community hub. This forms a key part of the Council’s Playing Pitch Strategy, which seeks the delivery of two multi-functional sports hubs in Gloucester; one in the north and one in the south of the city. The northern hub, located at Oxstalls Sports Park and the University of Gloucestershire, was complete in 2018.
- 3.3.19 The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that aren’t shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.
- 3.3.20 Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.

## Policy C4: Hot food takeaways

**Proposals for hot food takeaways, including mobile catering units must satisfy the following criteria:**

- 1. The design of the unit, including its ventilation and bin storage would not have a significant adverse impact on the visual amenity of the area; and**
- 2. There would not be a significant 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; and**
- 3. There would not be a severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues; and**
- 4. The proposal incorporates adequate waste storage and disposal facilities; and**
- 5. There should be a minimum of two non-A5 units, or at least 10 metres, between the units, whichever is greater.**
- 6. Outside of the city centre, district centres and local centres, that the proposal is not within 400 metres of a secondary school or college.**

- 3.3.21 Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.
- 3.3.22 Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2017/18 66.3% of adults and 36.8% of children in Year 6 were overweight. Reducing obesity, particularly among children, is one of the priorities of (PHE and the government’s ‘Childhood Obesity Plan’). Being overweight increases a person’s risk of developing cancer, heart disease and type 2 diabetes.
- 3.3.23 To help tackle childhood obesity through supporting healthy behaviours, hot food takeaways will not be permitted within 400 metres of a secondary schools or colleges. Primary schools have been excluded as children in this age group are normally restricted from leaving the school premises at breaktimes.
- 3.3.24 The policy also aims to control the clustering of hot food take-aways in order to retain a balanced mix of shops and services within local centres and to preserve the amenity of the local environment by controlling the noise, smells and general disturbance generated from the use.

## Policy C5: Air quality

**Proposals for major development must demonstrate compliance with EU limit values and achieving national objectives for air pollutants. Proposals must:**

- 1. Not create a new “street canyon”, or a building configuration that inhibits effective pollution dispersion; and**
- 2. Minimise public exposure to pollution sources, e.g. by locating habitable rooms away from busy roads, or directing combustion generated pollutants through well sited vents or chimney stacks; and**
- 3. Use green infrastructure, trees and hedgerows, to absorb dust and other pollutants; and**
- 4. Provide infrastructure that promotes modes of transport with low impact on air quality; and**
- 5. Control dust and emissions from construction, operation and demolition.**

**Within the city’s Air Quality Management Areas (AQMAs) and in areas near schools and hospitals, development which reduces tree cover, hedges and other forms of vegetation will be expected to make provision for a net gain in vegetation onsite and/or within the relevant buffer zone. The use of green roofs and walls in these areas will be strongly supported along with other suitable measures to increase vegetative cover.**

- 3.3.25 Air pollution is a major threat to the health and wellbeing of people living in urban settings. In the UK it has been estimated that the mortality burden of long-term exposure to particulate matter (PM2.5) in 2008 was equivalent to nearly 29,000 premature deaths in those aged 30 or older. The Public Health Outcomes Framework data tool shows the fraction of mortality attributable to air pollution by local authority (range 2.7 - 8.3%, average for

England 5.4%). It is likely that removing exposure to all PM2.5 would have a bigger impact on life expectancy in England and Wales than eliminating passive smoking or road traffic accidents. The economic cost from the impacts of air pollution in the UK is estimated at £9-19 billion every year which is comparable to the economic cost of obesity (over £10 billion). In 2013, the International Agency for Research on Cancer has identified outdoor air pollution as causing lung cancer, without identifying the specific pollutants that are the carcinogenic component.

- 3.3.26 Local authorities have a wide remit and their responsibilities touch on many aspects of our lives. To achieve their objectives, they need to draw on many different resources, some statutory, and some that rely on cooperation with others. Good air quality is one such objective, where many players can affect the outcome through actions taken in different places and sometimes over long periods of time as one development succeeds another.
- 3.3.27 Determining one application in isolation may not achieve good air quality on its own. This is often achieved through many decisions made in different circumstances guided by a mosaic of policies that implemented together will create better air quality. Gloucester City Council currently has three Air Quality Management Areas (AQMA's) as identified by breaches of the average annual mean action levels. The M5 motorway also runs along the eastern edge of the city and creates impacts in terms of air and noise pollution.

#### **Mitigating impacts through planting**

- 3.3.28 There is evidence that increased urban vegetation can help to reduce the impacts of air pollution, but a distinction should be made between reductions in concentrations of particulate matter and gaseous pollutants. In terms of gases, certain types of vegetation can remove small amounts of pollutants from urban air by deposition, but in terms of particulate matter, the planting of trees can redistribute particulates but not remove them. However reduced air temperature as a result of tree planting is believed to improve air quality because emissions of many pollutants and/or ozone-forming chemicals are temperature dependent - <https://laqm.defra.gov.uk/laqm-faqs/faq105.html>
- 3.3.29 In terms of trees, it is important to note that the level of effectiveness of any planting will depend on the season, the number of trees, the species, the siting, the canopy density and the prevailing wind direction in the particular street. NPPF Paragraph 81 states that in tackling air pollution green infrastructure provision and enhancement should be considered along with other initiatives.
- 3.3.30 AQMAs have been targeted for action for obvious reasons but the policy also targets areas around the city's schools and hospitals. This is due to the fact that these areas generally have high levels of vehicular traffic combined with the congregation of large numbers of people who are particularly vulnerable to air pollution. Close proximity in the context of this policy means within 50 m of the site boundary identified in the buffer zones on the Policies Map.

### **Policy C6: Cordon sanitaire**

**Development likely to be adversely affected by smell from Netheridge Sewage Works, within the Cordon Sanitaire defined on the policies map, will not be permitted.**

- 3.3.31 Severn Trent Water Limited is responsible for sewerage and sewage disposal. They operate Netheridge Sewage Treatment Works (NSTW) 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 be permitted.
- 3.3.32 To support the GCP, a new assessment of the odour impact of NSTW has been undertaken and has informed the boundary on the policies map. The cordon does not represent the absolute limit of the area where smells can be detected but is drawn so as not unreasonably to constrain development in the existing built-up area.

## Policy C7: Fall prevention from taller buildings

**On buildings or structures above 12 metres in height, planning permission will be granted where mitigation measures have been taken to help prevent suicide and accidental falls.**

**Where mitigation measures are used, such as anti-climb methods, fences, barriers and rails, these will be well designed and integrated into the overall design of the building.**

- 3.3.33 Suicide is a national and local health priority. In Gloucestershire suicide kills approximately 60-67 people a year. When compared to deaths from road traffic accidents, which were 29 in 2014, suicide is responsible for twice as many deaths. During a six-month period in 2019 Gloucestershire Constabulary dealt with 67 incidents of people attempting or threatening to attempt to jump from tall buildings across the city. Whilst not all suicides and attempted suicides 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 terms, 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.
- 3.3.34 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 safe and well-designed buildings. It is known that falls from more than four storeys are more likely to result in life changing injuries or death. Falls can occur accidentally, through misadventure or suicide. The average floor to floor height for an office building is 3.9 meters per storey. Residential buildings tend to have floor to floor heights of about 3.1 meters. Therefore, where buildings or structures are proposed above 12 metres developers will be required to provide a statement within the Design and Access Statement outlining how they have considered this policy.
- 3.3.35 The statement should outline what public access there will be to any roof, open element, or structure above 12 metres and what measures will be integrated into the design of the building to reduce the opportunities for suicide and falls. This could be as simple as ensuring that there is no public access to roof top spaces or designing out open sides above 12 metres on a car park for example. Where public access to an open roof top or element is possible,

over 12 metres, suitable well-designed suicide prevention measures will be required to be incorporated into the design of the building. These will be subtle and cohesive to the architectural design.

## Policy C8: Changing Places Toilets

**Where appropriate, major applications for retail, sports venues, cultural and leisure developments that propose to provide toilets will provide at least one toilet to the 'Changing Places' standard.**

- 3.3.36 The NPPF requires local planning authorities to put in place policies that create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.
- 3.3.37 People with profound and multiple learning disabilities, as well as other disabilities that limit mobility, cannot often use standard accessible toilets. People may be limited in their own mobility and require equipment to help them, or the space to have support from one or more carers. Standard accessible toilets (or “disabled toilets”) do not allow for both right-hand and left-hand side transfers, provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the user is put at risk, and carers are forced to risk their own health and safety by changing their loved one on a toilet floor. This is potentially dangerous, unhygienic and undignified. Everyone has a right to live in the community, to move around within it and access all its facilities. For some people the lack of a fully accessible toilet is denying them this right.
- 3.3.38 At present, none of the public toilets in the city meet this standard, although a Changing Places toilet is proposed within the refurbishment of Kings Walk Shopping Centre. The City Council will actively encourage developers to provide enhanced accessible toilets within schemes. This is considered especially important for those uses that are accessed by the public. 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)

## D: HISTORIC ENVIRONMENT

### Introduction and context

- 3.4.1 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. Gloucester's heritage 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.
- 3.4.2 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.
- 3.4.3 Given the importance of heritage and the benefits it can bring to the economy, the following policies meet several of the of the GCP key principles. Of note is (3) in relation to heritage and regeneration, (4) in building on existing strengths to create a diverse and innovative cultural, tourism, arts and sporting offer and (9) which seeks protect and enhance environmental assets.
- 3.4.4 This policy should be read in conjunction with Policy SD8 'Historic Environment' of the JCS.

### Policy D1: Historic environment

**The City Council will support proposals that conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:**

- 1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and**
- 2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and**
- 3. The proposed use of the heritage asset is compatible with the preservation or enhancement of its significance; and**
- 4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and**

5. **The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and**
6. **Retains important views into or out of the Conservation Area.**

**Development involving substantial harm to, or the loss of designated heritage assets will only be granted in very exceptional circumstances. The condition of an historic building resulting from deliberate damage and neglect will not be considered in any decision.**

**The historic core of the city contains extensive archaeological remains of the highest significance. Sites of similar importance are found in more localised areas throughout the wider city. Great weight will be given to the preservation of any such remains, whether designated or undesignated.**

- 3.4.5 This policy sets out a clear and positive strategy for the conservation, enjoyment and enhancement of Gloucester’s historic environment and should be considered in conjunction with guidance provided in the National Planning Policy Framework (NPPF), the adopted JCS Policy SD8 Historic Environment and Gloucester Heritage Strategy 2019-2029 (2019). Development will be required to respect and respond positively to heritage assets and their settings, avoiding loss or harm to their significance. The NPPF defines significance as ‘The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’ It further defines designated heritage assets as ‘A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation’ (Annex 2: Glossary).
- 3.4.6 The historic environment consists of archaeological remains, historic buildings, townscapes and landscapes these add value to heritage-led regeneration, improving health and well-being and attract economic investment and tourism. They are also a source of significant local pride, contributing to local identity, acting as a valuable cultural and educational resource by improving our understanding and appreciation of Gloucester’s past. Heritage is a key component in the effective delivery of sustainable growth. It contributes to the creation of a competitive city centre, supports the diverse needs of local communities, and a high quality and sustainable environment. The City Council’s adopted Heritage Strategy (2019 – 2029) highlights a range of evidence / information on the city’s designated assets, and identifies opportunities for heritage to support wider regeneration, economic development, tourism and cultural aspirations. It will further be used to inform conservation and enhancement measures, public engagement and interpretation. The strategy and background document are available to download from the City Council’s website.
- 3.4.7 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. Where demolition is required that includes, or is adjacent to, a built heritage asset, the City Council will require the consolidation of that asset prior to demolition proceeding.
- 3.4.8 Equally the preservation of archaeological remains, especially those of the highest significance, is an objective of the NPPF. Preserving archaeological remains in-situ, rather

excavating them is also more economically viable and represents a more sustainable approach for the city (Preserving Archaeological Remains Decision-taking for Sites under Development, Historic England 2016).

### **Describing the significance of heritage assets**

3.4.9 Where planning applications are submitted for sites with archaeological interest:

- Applicants should seek early discussion with the City Council 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 may be required to provide an archaeological desk-based assessment. This assessment should be:
  - Informed by a search of the Gloucestershire Historic Environment Record;
  - 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 Council 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 Council Archaeologist;
  - Undertaken in accordance with a Written Scheme of Investigation (approved by the City Council Archaeologist); and
  - Outlined in a report to be submitted in support of the planning application.

### **Where applications are likely to affect a built heritage asset, conservation area 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. As assessment of the character of the local area with reference to the adopted conservation area appraisal and management recommendations should also be included where necessary. This may include:
  - Built heritage assessment;
  - Assessment of significance;
  - Character appraisal and photomontages; and
  - Setting assessment; and an impact assessment.

3.4.10 Applicants should seek early discussions with officers prior to the submission of an application to establish the scope and nature of the supporting information required.

## **Policy D2: Non-designated heritage assets**

**Where development affects a non-designated heritage asset, it will be necessary to satisfy the following criteria. Development proposals should:**

1. **Be of high quality and designed sympathetically to preserve the historic, architectural and archaeological interest.**
2. **Respect the surrounding landscape and its setting.**
3. **Seek to enhance the character of the non-designated heritage asset.**

**Proposals for demolition or total loss of non-designated heritage assets will be subject to a balanced assessment taking into account the significance of the asset, the scale of harm or loss, and that all reasonable steps have been taken to retain the asset, including an assessment of alternative uses.**

- 3.4.11 A building or monument which is identified as being of national importance for its 'special architectural or historic interest' are known as statutory Listed Buildings or scheduled monuments and are given special protection by law. There are, however, many heritage assets (for example buildings, structures, monuments, landscapes and spaces) which, while not satisfying the national criteria, have strong local interest or appearance and contribute significantly to the distinctive character of Gloucester's Historic Environment. These are identified as non-designated heritage assets. All archaeological remains should be considered as non-designated heritage assets.
- 3.4.12 Gloucester City Council does not have a formal local list of non-designated heritage assets, but the Council have developed criteria for the identification of undesigned heritage assets which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance 'Local Heritage Listing: Historic England Advice Note 7', which is available to download from the Historic England website.
- 3.4.13 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future Local List.

### **Policy D3: Recording and advancing understanding of heritage assets**

**Where development reveals, alters or damages a heritage asset, the City Council will require developers to record and advance the understanding of the significance of that asset prior to, and/or during development. The method used will be dependent on the nature of the impact and upon the significance of the asset. The developer will be responsible for the dissemination of any record created.**

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

3.4.15 Mitigation will be undertaken in accordance with a 'Written Scheme of Investigation' approved by the City Council. Mitigation may include (but is not restricted to):

- Historic building recording;
- Archaeological watching brief;
- Archaeological evaluation;
- Archaeological excavation; and
- Preservation in situ by design.

3.4.16 All new information gathered from investigations and mitigation will be appropriately disseminated and any archive material deposited with the Museum of Gloucester or other appropriate repository. Opportunities will be sought for community engagement, education and outreach activities to be integrated into any mitigation works. Dissemination may include (but is not restricted to):

- Public engagement and outreach;
- Interpretation and public art;
- Submitting of reports to the Historic Environment Record;
- Publication of results in appropriate journals; and
- Deposition of archives in appropriate repositories.

## **Policy D4: 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 an area. The City Council will support the following;**

- 1. Proposals that retain or reinstate traditional timber shopfront architectural detailing, including timber fascia's and painted signage;**
- 2. New shopfronts which are of a high quality and respond to the character of the area;**
- 3. Internal shutters which are open and allow shopfront displays to be prominent in the streetscene;**
- 4. Signage which is sympathetic to its surroundings and not visually dominant or results in visual clutter;**
- 5. Illuminated signage which is halo illuminated especially in sensitive historic settings;**
- 6. Traditional hanging signs in timber on a metal bracket; and**
- 7. Colours for shopfronts and signage should be sympathetic to the character of a building or area and very bright and garish colours should be avoided.**

**Proposals to alter or create a new shopfront, shutter or signs should take account of the guidance provided in the Shopfronts, Shutters & Signage Design Guidelines for Gloucester Supplementary Planning Document and any future iterations.**

3.4.17 The Shopfront, Shutters and Signage policy will ensure that schemes are well considered and make a positive contribution to the streetscene and wider urban environment. Most people recognise the importance of an attractive central shopping core to the city and encourages tourism providing an attractive environment for business and residents. A high standard of

shopfront design, construction and maintenance is one of the most effective ways of improving appearances and changing perceptions of local character and pride. Retention of historic shopfronts and sympathetic signage can help to protect the history of our city, provide opportunity for innovative and imaginative design and can result in a more attractive, richly varied and prosperous environment for residents, traders, workers and visitors alike.

- 3.4.18 Proposals should accord with the City Council's Shopfronts, Shutters & Signage Design Guidelines for Gloucester Supplementary Planning Document (2017) or any future iteration. This document provides information on general design guidelines to be used during the design or alterations to shopfronts, shutters and signs across the city and will be used to support the regeneration of Gloucester.

## **Policy D5: Views of the Cathedral and historic places of worship**

**Development proposals should not harm any key views of the Cathedral and other historic places of worship.**

- 3.4.19 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. Further guidance is available in the City Council's 'Heights of Buildings' Supplementary Planning Document or any future iteration.

## E: NATURAL ENVIRONMENT

### Introduction and context

- 3.5.1 The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25-year plan to improve the environment' which set several challenging targets. In June 2019 the Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this.
- 3.5.2 At a local level the City Plan seeks to make a difference. The policies in this chapter specifically reflect City Plan Key Principles 1, 9 and 11. All the policies aim, directly or indirectly, to address climate change. With effective implementation on the ground, these policies will make a difference locally even if the results seem small when weighed against the global climate change scenario. There is a push to protect our most valued natural environments and species and to green our urban neighbourhoods with more trees and more green roofs/walls. In doing this we cool the city, create more attractive places, encourage wildlife and tackle air pollution and associated health problems. The plan seeks better quality green infrastructure in Gloucester and areas where nature can recover and thrive.
- 3.5.3 The NPPF strongly promotes the concept of 'biodiversity net gain' through development. This is specifically reflected in Policy E2 and several other policies in the plan.
- 3.5.4 Gloucester is very prone to serious flooding and this situation will be exacerbated as the climate changes. Policy E6 is detailed and robust and has been written on the basis of collaboration and the latest advice from the Environment Agency.

### Policy E1: Landscape character and sensitivity

**Development proposals in areas of Gloucester outside of the Joint Core Strategy (JCS) Landscape Characterisation and Sensitivity Analysis (supporting JCS Policy SD6) will be judged on their own merits. Applicants will be expected to adopt a balanced approach, providing for housing, employment and/or other needs whilst seeking to protect and enhance features of the local landscape which contribute to a sense of environmental quality and local distinctiveness.**

**Trees, hedgerows and areas of green (not otherwise protected) but which contribute to local landscape character should, where at all possible, be retained and utilised to enhance development. Applications should make clear how retained features will be effectively managed and maintained in the future.**

**For major development proposals, a Landscape Visual Impact Assessment will be required where it is considered that the local landscape is particularly sensitive.**

- 3.5.5 This policy has clear links to JCS Policy SD6 Landscape and the associated evidence base namely the report: Landscape Characterisation Assessment and Sensitivity Analysis. This

evidence focused the sensitivity analysis on the fringes of the city but excluded those within the urban area.

- 3.5.6 This policy is focused on development sites in their wider landscape context; it's focus is on the wider setting, character and sensitivity which can be important even when assessing small schemes.

## **Policy E2: Biodiversity and geodiversity**

**Development proposals that demonstrate the conservation of biodiversity, in addition to providing net gains appropriate to the ecological network, will be permitted. Potential adverse impacts on natural environment assets, including the connectivity of the ecological network, must be avoided or satisfactorily mitigated in line with the objectives of the Gloucestershire Local Nature Partnership or a future equivalent body.**

**In exceptional circumstances, where an impact cannot be avoided or mitigated on site, compensatory measures, including the use of biodiversity offsets will be considered as a means to provide an overall net gain.**

### **1. Internationally designated sites:**

**Development proposals will only be permitted in localities that could have an impact upon designated Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar Sites, where it can be demonstrated that:**

- a) There will be no significant effect, alone or in combination, considering the site's conservation objectives; or**
- b) Any adverse effect on the site's integrity can be mitigated.**

**Where an adverse effect (or effects) on integrity cannot be mitigated, further tests will apply in order to decide whether permission can be granted.\***

### **2. Nationally designated sites:**

**Development proposals will only be permitted in localities that could have an impact upon designated Sites of Special Scientific Interest (SSSI), where it can be demonstrated that:**

- a) There will be no conflict with the conservation, management and enhancement of a designation; and**
- b) Any potentially harmful aspects of development can be satisfactorily mitigated; and**
- c) There would be no wider indirect and/or cumulative impact on the national network of SSSIs; or where the benefits of development clearly outweigh the potential adverse impacts upon the key features of any designation.**

### **3. Locally designated sites:**

**Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS)) and Regionally Important Geological Sites**

**(RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:**

- a) The development would not have an adverse impact on the registered interest features or criteria for which the site was listed; or**
- b) The importance of the development significantly and demonstrably outweighs the harm and the harm can be mitigated through appropriate measures and a net gain in biodiversity is secured.**

**Development proposals that could adversely affect legally protected species will only be permitted where it can be demonstrated that suitable safeguarding measures will be provided.**

- 3.5.7 Gloucester is a growing and regenerating city, but this need not be at the expense of protected and valued geodiversity and biodiversity. Open natural areas in and around the city, even those that are seemingly small or obscure, play an important role in supporting wildlife of many varieties and form part of a wider ecological network. Enhancing biodiversity can also lead to significant reductions in various forms of pollution and positive impacts for health and wellbeing.
- 3.5.8 In accordance with the NPPF, the City Council seeks to protect and enhance the ecological network, improving the biodiversity of sites by achieving net biodiversity gains from development. Developers should demonstrably follow the mitigation hierarchy, which should be designed to maintain and, where possible, improve the connectivity of the network. The appropriate type and level of provision will be a matter for the City Council in consultation with bodies such as the Local Nature Partnership (LNP).
- 3.5.9 The NPPF states that local wildlife-rich habitats and wider ecological networks should be mapped and taken account of through the planning process. The LNP are in the process of mapping the ecological network for Gloucestershire; identifying existing habitat, restoration opportunities (in terms of ecological opportunities), key existing connectivity and the strategic locations for increasing connectivity.
- 3.5.10 If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as 'biodiversity offsetting' in the nearest Green Infrastructure (GI) project as set out in the JCS Green Infrastructure Strategy, or if this isn't possible, in Gloucester's designated Nature Recovery Area (NRA) as detailed at Policy E3 of the GCP.
- 3.5.11 For the avoidance of doubt, please note that 'Local Wildlife Sites' were previously known as 'Key Wildlife Sites'.
- 3.5.12 The River Severn, Severn Estuary and tributaries provide a route for migratory fish forming part of the reasons for the Severn Estuary's designation as a Special Area of Conservation and Ramsar Site. The Severn Rivers Trust has been established to promote projects to improve fish passage along the Severn and to develop greater use of the rivers Severn and Teme by locals and visitors. Development that may have direct and indirect impacts on watercourses used by the SAC and Ramsar species will be subject to a Habitats Regulations Assessment (HRA).

- 3.5.13 Similarly, areas of land within the city such as Alney Island Nature Reserve provide refuge land for bird species designated as part of the Severn Estuary Special Protection Area (SPA). Development that may have direct or indirect impacts on such 'functionally linked land' used by SPA bird species will be subject to a Habitats Regulations Assessment (HRA).

### Policy E3: Nature Recovery Area

**The Severn Vale Nature Recovery Area (NRA) as shown on the policies map has been identified as an area for biodiversity offsetting as part of achieving biodiversity net gain when proposals cannot deliver enhancements on site or at priority Green Infrastructure projects.**

**Development proposals within the NRA, or in an area ecologically related to it, should identify the biodiversity constraints and opportunities. Applicants should show how the proposal will help to achieve net gain for biodiversity in keeping with the species and habitat priorities identified in consultation with the Local Nature Partnership (LNP) or future equivalent body.**

- 3.5.14 The Severn Vale Nature Recovery Area (NRA) lies to the west of Gloucester in the floodplain of the River Severn. The NRA (within Gloucester City) is just a small part of a much larger strategically important ecological network. Improvements and enhancements in the NRA will be part of a long-term strategy whereby the City Council, working with a range of stakeholders, will work to realize the potential of a Regional park or similar for the Severn Vale.
- 3.5.15 Target species currently identified for the Severn Vale NRA are: Brown Hare, Otter, Water Vole, Reed Bunting, Farmland Birds, Curlew, Herring gull, True Fox Sedge, Bullfinch, Bewick Swan, all bat species, Great Crested Newt, Lesser Spotted Woodpecker, House Sparrow, Starling, Noble Chafer, Mistletoe Marble Moth and the Harvest Mouse. The priorities may be subject to change due to ongoing renewal of evidence and will be determined by the LNP.
- 3.5.16 Target habitats for the Severn Vale NRA are:
- Lowland Meadows - management, restoration and creation
  - Coastal and Floodplain Grazing Marsh - management, restoration and creation
  - Traditional Orchards - management, restoration and creation
  - Ponds - management, restoration and creation (particularly of pond complexes)
  - Wet Woodland - management and creation
  - Hedgerows - management and restoration
  - Arable Field Margins - management and creation
  - Reed bed - creation
  - Coastal Saltmarsh and Intertidal Mudflats - creation
  - Lowland Mixed Deciduous Woodland – management and restoration
- 3.5.17 This list is not exclusive, and priorities may be subject to change due to the ongoing renewal of evidence and will be determined in partnership with the LNP or future equivalent body.

## Policy E4: Trees, woodlands and hedgerows

**Development proposals should seek to ensure there are no significant adverse impacts on existing trees, woodlands or hedgerows and that every opportunity is taken for appropriate new planting on site. In the case of an unavoidable significant adverse impact on trees, woodlands and hedgerows, the developer must provide for measurable biodiversity net gain on site, or if this is not possible:**

- 1. At nearby Green Infrastructure projects/areas; or**
- 2. In suitable areas of parks, open spaces, verges; or**
- 3. Through the restoration or creation of traditional orchards, prioritising sites identified as opportunities for increasing the connectivity of the ecological network; or**
- 4. As new or replacement street trees.**

**Development which would result in the loss of irreplaceable habitats such as Ancient Woodland, Ancient Trees and veteran trees\* will not be permitted except in wholly exceptional circumstances.**

**On development sites where existing trees to be retained, applicants will be required to demonstrate how these trees will be protected through all phases of development. It is expected that the protection measures will adhere to those contained within BS 5837:2012 Trees in relation to design, demolition and construction – recommendations, or subsequent revisions.**

**All new planting, either on site or elsewhere in the city as part of biodiversity net gain must be provided to the satisfaction of the City Council.**

- 3.5.18 The City Council recognises the many benefits which woodlands, orchards, hedgerows and trees generally bring to the city. Trees and hedgerows are an important part of the city's landscape having cultural and biodiversity significance, amenity value and providing cooling effects in urban areas. Tree planting can reduce the impacts of air pollution, the impacts of climate change and global warming and improve health and wellbeing of the community.
- 3.5.19 The basis of this policy is a strong commitment to increase tree cover across Gloucester and to increase the number of street trees and trees in parks and areas of Green Infrastructure where there is scope to do so. Likewise, it is important that trees and hedgerows, as natural assets, are preserved for the enjoyment of future generations. Net gain and mitigation planting, depending on location, will generally be required to be locally appropriate native species.
- 3.5.20 In terms of street trees, the Council considers that, given the significant benefits which trees afford to all residents of the city, technical solutions are available to address concerns such as pavement heave or issues of reduced visibility and mobility.

\* Veteran trees are defined as 'trees that are of interest biologically, culturally or aesthetically because of their age, size or condition' (Ministry of Housing, Communities and Local Government; Ancient trees and veteran trees: protecting them from development', 2019).

## Policy E5: Green Infrastructure: Building with Nature

**Development must contribute towards the provision, protection and enhancement of Gloucester's Green Infrastructure Network. Contributions should be appropriate and commensurate to the proposal. Major development proposals will be designed in accordance with 'Building with Nature' standards.**

- 3.5.21 JCS Policy INF3 and the associated Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale. Proposals will be supported that contribute to this objective. This also contributes to mitigating impacts of recreation pressure on European designated sites.
- 3.5.22 Development should generally contribute to the broader network of GI corridors and assets across the city using SuDS, open space, green roofs and walls and tree planting.
- 3.5.23 GI and its associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. It also has functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaptation and amenity value.
- 3.5.24 Development has the potential to block corridors resulting in the isolation of habitats from the ecological network which is a concern in an urban area such as Gloucester. The rivers, brooks, disused railway corridors, footpaths and 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.
- 3.5.25 'Building with Nature' was developed by the Gloucestershire Wildlife Trust in partnership with the University of the West of England and MHCLG. It promotes a new benchmark for the design and maintenance of green infrastructure in housing and commercial development.
- 3.5.26 For major developments, the Council will expect developers to use 'Building with Nature' standards to inform development. Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.

## Policy E6: Flooding, sustainable drainage, and wastewater

**Development shall be safe from flooding and shall not lead to an increase in flood risk elsewhere. In accordance with the National Planning Policy Framework, flood risk betterment shall be sought through the development process.**

**Planning permission will not be granted for any development in the functional flood plain (Flood Zone 3b) except for development with 'water compatible' and 'essential infrastructure' flood risk vulnerability development classifications.**

**The sequential test (flood risk) and exception test will be evaluated in line with government planning guidance.**

**All development will be expected to incorporate Sustainable Drainage Systems (SuDS) to reduce surface water discharge rates and address water quality, unless it can be shown, to the satisfaction of the City Council, that this is not feasible.**

**The most up to date Environment Agency and Local Lead Flood Authority climate change guidance shall be used in the evaluation of fluvial flood risk and for the design of drainage / SuDS.**

**Development proposals shall facilitate watercourse restoration, exploiting opportunities to open culverts, naturalise river channels, and protect and improve the floodplain, buffer strips and adjacent terrestrial habitats and water quality, as well as the heritage value. Development proposals to impound and narrow waterways will be refused.**

**An 8 metre riparian buffer strip, measured from the top of bank to each side of the watercourse or the outside edge of any culverted watercourses where is necessary for the culvert to remain in situ, shall be kept free of development. As well as for flood risk reasons, this is to facilitate maintenance access and to act as a green corridor for ecological benefit.**

**Applicants shall demonstrate that all surface water discharge points have been selected in accordance with the principles laid out in within the SuDS/drainage hierarchy. That is, where possible, connections to the public sewerage systems, and in particular the combined sewer network, are to be avoided. Wherever possible, foul drainage from development shall connect to the mains public sewer.**

**Where necessary, financial contributions towards flood risk management infrastructure will be sought through the development process.**

- 3.5.27 Proposals for new development must be in accordance with: the NPPF; Planning Policy Guidance; JCS Policy INF2; Gloucester's Strategic Flood Risk Assessment Level 1 and Level 2; Gloucestershire County Council's SuDS Design and Maintenance Guide; Gloucester City Council's Sustainable Drainage Design and Adoption Guide, or any future iterations.

### **Flooding**

- 3.5.28 Gloucester has been identified as a 'Flood Risk Area' by the Environment Agency following a preliminary flood risk assessment for river, sea and reservoir flooding, carried out to meet the requirements of the European Floods Directive (2007/60/EC) (transposed into the Flood Risk Regulations (2009)). Flood Risk Areas are where the risk of flooding is likely to be significant at a national scale for people, the economy or the environment (including cultural heritage). As such, it is particularly important that Gloucester has robust policy with respect to flooding, sustainable drainage, watercourses and wastewater. All of Gloucester's watercourses are considered to lack capacity during design rainfall events; any increase in surface water discharge from development sites therefore represents an increase in flood risk.
- 3.5.29 Proposals should have specific regard to the design principles outlined in the National Planning Practice Guidance, including a sequential approach to site layout, ensuring safe

access is available for the lifetime of the development (i.e. incorporating climate change) and that it is supported by suitable flood warning and evacuation plans.

### **Sequential Test & Exception Test**

- 3.5.30 The area of search for the flood risk sequential test shall generally be the whole of the Gloucester City - unless it can be demonstrated that there is a specific need in a specific location. The City Council's aspiration to redevelop a redundant brownfield site may be considered in the evaluation of the sequential test.
- 3.5.21 Sleeping accommodation shall not be permitted where the floor level is below the design flood level. For the purposes of the exception test, the design flood level is that with a return period of 1% (100 year probability) with the appropriate allowance for climate change.

### **Sustainable Drainage Systems (SuDS)**

- 3.5.22 Gloucester City Council actively seeks blue-green infrastructure through the development process, to mitigate against flood risk, by building with nature.
- 3.5.23 All development proposals will be required to manage surface water through SuDS and reduce the existing discharge rate on previously developed sites. For brownfield sites, the post-development discharge rate shall be as close to the greenfield rate as possible and, as a minimum, at least 40% lower than the pre-development discharge rate. The 40% reduction is used across all districts in Gloucestershire and is cited in the Lead Local Flood Authority (LLFA) 'SuDS Design & Maintenance Guide'. This figure reflects a consensus view amongst district drainage officers, and the consultant engaged to write the SuDS guide, about what is 'reasonably practicable'. Additionally, the LLFA and districts have been successfully applying this standard to development since November 2015, thus demonstrating that it is a viable requirement. For greenfield sites, in the absence of long-term storage, flows shall be attenuated to QBar (mean annual flood).
- 3.5.24 Above ground SuDS (for example attenuation basins and swales), offer significant benefits over below ground systems, including water quality, biodiversity and amenity, and shall be incorporated where practicable. Larger developments will be expected to incorporate SuDS for source control (for example water butts and green roofs) and conveyance (for example swales), as well as for attenuation.
- 3.5.25 The design of SuDS shall be considered at the earliest possible stage. If an adequate level of SuDS cannot be provided on site, there will be a requirement for a contribution to off-site measures.
- 3.5.26 None of Gloucester's watercourses, currently assessed under the Water Framework Directive, have reached the targeted 'good' status. In order to achieve 'good' status by the target date of 2027, surface water discharge from developments must address water quality issues. The preferred option for addressing water quality is through the installation of SuDS, but where this is not practicable, demonstrably effective proprietary devices may be used. Development should address the water quality guidelines set out in the most up to date version of the CIRIA SuDS Manual (C753).

### **Climate Change**

- 3.5.27 In calculating the attenuation volume requirements, the uplift on rainfall to allow for climate change shall be 40%, unless it can be demonstrated that the site is likely to revert to greenfield prior to 2070. It is expected that the Environment Agency climate change guidance will be updated in 2019/20 to incorporate the UK Climate Projections 2018 data (UKCP18). This is likely to increase the 40% requirement, and developments will be expected to adhere to the latest guidance, including any future upgrades to climate change guidance during the plan period.
- 3.5.28 For calculating the climate change uplift for river flows (i.e. to determine the design flood level for a development which influences the design of the development including floor levels, flow routes, floodplain compensation and safe access and egress arrangements), developers should refer to the latest Environment Agency climate change guidance. Developers are encouraged to assess the Upper End allowances (currently 70% for the Severn River Basin District based on 100 years lifetime of development). Major regeneration projects and infrastructure development are expected to be designed to this level.

### **Watercourses & culverts**

- 3.5.29 Gloucester's waterways and watercourses are multifunctional assets. They provide transport and recreation corridors, green infrastructure, a series of diverse and important habitats, a unique backdrop for important heritage sites, landscapes, views, a backdrop for cultural and community activities, as well as drainage, flood and water management, and urban cooling functions.
- 3.5.30 Gloucester City Council supports the Environment Agency in terms of culvert improvement; culverts shall be improved in accordance with the following hierarchy of betterment options; (1) open the culvert (2) replace the culvert (3) leave the culvert in open space for future to open up. All the above options need to incorporate 8 metre buffer strips to allow for access. Each option will still require riparian owners to undertake their responsibilities with regards to maintenance and upkeep of the culvert. It will need to be demonstrated that options higher up the hierarchy are not practicable for them to be discounted. Applicants should contact the Environment Agency and the Lead Local Flood Authority at the earliest opportunity to understand the constraints and opportunities of culverted watercourses for their proposals.
- 3.5.31 Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the city Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improvingly hydromorphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.

### **Wastewater**

- 3.5.32 The existing sewerage network is known to have areas with capacity issues and network constraints and in some cases improvements to the network may be required for new

development to connect. Applicants should contact Severn Trent at the earliest opportunity to understand if improvements to the network are required.

- 3.5.33 Surface water run-off discharge points should be as high up the hierarchy of drainage options as possible; (1) into the ground (infiltration) (2) to a surface water body (3) to a highway drain (4) to another drainage system and (5) to a combined sewer.
- 3.5.34 The creation of an overall masterplan for the development will enable strategic infrastructure serving multiple developments to be designed appropriately, providing wider benefits and efficiencies that would not otherwise be possible. The masterplan should outline key milestones that need to be achieved for critical infrastructure. This will help to align programmes between different stakeholders.

#### **Financial contributions towards flood risk management infrastructure**

- 3.5.35 Where appropriate, in partnership with the Environment Agency and other flood risk management bodies, the Council will seek financial contributions towards flood risk management infrastructure. The advice within paragraph 56 of the NPPF relating to planning obligations shall be key to determining appropriateness. Such instances would be rare but could include cases where the safety of a development and/or the ability to access the development safely, relies upon flood defences, the Environment Agency's Flood Warning System, or other flood risk management infrastructure.
- 3.5.36 The Environment Agency has experience of working with developers and Councils in Gloucestershire to secure financial contributions in such cases. Money secured through such planning obligations can be used towards maintenance and improvements of flood defences, provision and upkeep of river gauges (which support the Flood Warning Service), and other flood risk management projects.

### **Policy E7: Renewable energy potential of the River Severn and the canal**

**Development that utilises the renewable energy potential of the River Severn and the Gloucester and Sharpness Canal will be supported providing there will be no adverse impacts on commercial and leisure uses and on the biodiversity of watercourses and riparian habitats.**

- 3.5.37 All forms of renewable energy generation are increasingly important as globally, nationally and locally, mitigation and adaption measures are needed to combat climate change. According to the Canal and River Trust the water flowing through the UK's waterways contains enough energy to produce approximately 640 MW of energy.
- 3.5.38 Gloucester benefits both from a major river and a broad canal running through parts of the city. Through the use of heat exchange technologies there is the potential for significant benefits in terms of the heating and cooling of existing or future buildings. All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust and Natural England.

- 3.5.39 Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, which will be subject to a Habitats Regulations Assessment (HRA).

## **Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation**

**Development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) (alone or in combination), and the effects cannot be mitigated.**

**In order to retain the integrity of the SAC, and to provide protection from recreational pressure, all development that results in a net increase in dwellings will be subject to Habitats Regulations Assessment for likely significant effects. Any development that has the potential to lead to an increase in recreational pressure on the SAC will be required to identify any potential adverse effects and provide appropriate mitigation. This will be in accordance with the SAC mitigation and implementation strategy or through a Habitats Regulations Assessment.**

**Development which is likely to generate road traffic emissions to air, which are capable of affecting the SAC, will be screened against the Habitats Regulations Assessment Framework in line with Natural England's guidance 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)', or any future iteration.**

- 3.5.40 There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a Gloucestershire wide approach is required in order to successfully mitigate and likely adverse impacts.
- 3.5.41 The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. The mitigation strategy is expected to be available in early 2020.
- 3.5.42 In order to comply with the Habitats Regulations 2017, and specifically to address uncertainties regarding the effects of recreation pressure from new housing in Gloucester City, it is important to provide a policy approach to ensure effective mitigation. The above policy ensures this by requiring that, where residential development is likely to have an adverse impact on the SAC through increased recreational pressure, these impacts are mitigated. Mitigation should be undertaken as per the SAC mitigation strategy or through a bespoke Habitats Regulations Assessment for the development.

3.5.43 Appropriate mitigation measures may include:

- On-site measures, including for example the provision of open and green space where this can be accommodated.
- Where this is not possible, financial contributions towards off-site measures such as green infrastructure, habitat management, access management, residential travel plans, visitor infrastructure and publicity and awareness raising.

3.5.44 Any mitigation measures should take account of and integrate with:

- Adopted JCS Policy INF3: Green Infrastructure and the associated JCS Green Infrastructure Strategy.
- City Plan Policies E2: Biodiversity & Geodiversity, E3: Nature Recovery Areas and E5: Green Infrastructure / Buildings with Nature.

3.5.45 The Cotswold Beechwoods SAC lies within 200m of the A46. The 'air pollution information service' (APIS) website ([www.apis.ac.uk](http://www.apis.ac.uk)) indicates that the SAC currently exceeds its critical loads and levels for nutrient nitrogen. Natural England have therefore advised that development proposals that may generate additional traffic along this route should take account of Guidance Note NEA001. This will ensure that the most up-to-date information in line with the Habitats Regulations 2017 are referenced and that the information is consistent with the Wealden case law dealing with in combination effects.

## F: DESIGN

### Introduction and context

- 3.6.1 Design is an important part of a sustainable planning system. The design of buildings, streets and spaces affects how people feel, behave, and interact with the city. It is widely acknowledged that although design is only part of the planning process, it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Policy SD4 of the Joint Core Strategy (JCS) sets out a comprehensive list of urban design and architectural design requirements as part of new development. It also provides a list of requirements for the content of Masterplans and Design Briefs.
- 3.6.2 Key Principle 10 of the City Plan seeks to deliver development that achieves high quality design and layouts that integrates new and existing communities, reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable city.
- 3.6.3 Design is very closely linked to Healthy Communities and Sustainable Living, Transport, and Infrastructure. Well-designed places can help to reduce health inequalities and respond to the challenges of climate change.
- 3.6.4 The policies below aim to protect and enhance Gloucester's unique local distinctiveness by giving careful consideration to the architectural detailing of proposals, create attractive climate change resistant landscapes, ensure community safety is a fundamental part of the design process, mitigate against damage from gulls, protect open plan estates and adopted the Nationally Described Space Standards which will ensure new homes are suitable in size and have adequate storage.

### Policy F1: Materials and finishes

**Development proposals should achieve high quality architectural detailing, external materials and finishes that are locally distinctive. Developments should make a positive contribution to the character and appearance of the locality and respect the wider landscape.**

**Innovative modern materials will be encouraged where they strongly compliment local distinctiveness.**

- 3.6.5 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 using locally sourced materials and promoting traditional skills.
- 3.6.6 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.

- 3.6.7 Attention to detail can really make or hinder the overall design, appearance and quality of a place. Particular attention will be paid to: finishes, materials, joins and fixing methods between materials, window sills (double sub-sill window sills are architecturally inappropriate), window reveals, window design, lintels, door design, the placement of meter boxes, flues, vents, chimneys, gutters and down water pipes, aerials, antenna and boundary treatments (although this list is not exhaustive).
- 3.6.8 The wider landscape of a scheme needs to be carefully considered. New developments should avoid the use of light coloured or reflective roofing materials so that the development doesn't have undue prominence when viewed from the surround landscape.

## Policy F2: Landscape and planting

**Major development proposals must be accompanied by a landscape scheme, 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; and**
- 2. Retain and incorporate existing natural features such as trees, hedges and watercourses, where possible; and**
- 3. Ensure, in appropriate developments, especially housing schemes, that adequate space is provided for the planting and maturing of suitable large-scale trees; and**
- 4. Indicate areas of public open space and amenity land that are proposed for adoption and provide full details of who will be adopting and maintaining the spaces.**

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

- 3.6.9 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.
- 3.6.10 The use of native species in new planting schemes, particularly species that are indigenous to the Gloucester vale, will help to increase biodiversity in the city. Using local species means that they:
- Grow better as they are adapted to the local climate
  - Suit their local context (e.g. urban edge sites)
  - Support significantly more species of fauna.

- 3.6.11 The use of seed and plant stock of local provenance will also be encouraged. Consideration should also be given to the changing climate ensuring that species are chosen that can withstand the effects of climate change.
- 3.6.12 Where appropriate hard landscaping schemes should accord the Gloucester Public Realm Strategy and any subsequent amendments.

### **Policy F3: Community safety**

**Planning permission will be granted for developments, including the associated public realm and landscaped areas, that are designed to ensure that community safety is a fundamental principle of the proposed development. This includes:**

- 1. Maximising natural surveillance; and**
- 2. Laying out the development in a way that creates secure perimeter blocks with back to back development; and**
- 3. Providing secure rear gardens; where there are rear accesses these are secure and private; and**
- 4. Parking on plot or to the front of active frontages that provide overlooking; and**
- 5. Creating attractive to use, safe and where appropriate vibrant streets which provide visual interest and active frontages, particularly at street level avoiding blank walls; and**
- 6. Footpaths that are well designed, lit, straight and overlooked.**

- 3.6.13 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.
- 3.6.14 Parking courts are not normally considered appropriate as these can often be poorly surveilled and inconvenient for residents who prefer to park at the front of their property where they can see their vehicle and easily access their front door. Often parking courts are abandoned as the development ages and can become areas for fly tipping and antisocial behavior. Integrated garages will only be accepted where there are windows serving habitable rooms on the ground floor overlooking the driveway and street.
- 3.6.15 Further guidance can be found in the City Council's 'Designing Safer Places' Supplementary Planning Document, or any future iteration.
- 3.6.16 When designing public buildings and spaces consideration shall also be given to designing out opportunities for malicious threats and acts of terror. The council will seek the views of the Police Architectural Liaison Officer from Gloucestershire Constabulary on all major planning applications.

### **Policy F4: Gulls**

**Developments are expected to implement 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.**

- 3.6.17 Both lesser black-backed gulls and herring gulls nest in and around Gloucester City. Both species are experiencing declines across their range and a major proportion of the European breeding population of both species is found within the UK. The herring gull's conservation status is listed as 'red' and that of the lesser black-backed gull 'amber'. Gulls are declining in their traditional breeding localities due to a reduction in food (fish) and have colonised urban areas because of the ready availability of food (food waste, litter) and predator-free nest sites (buildings).
- 3.6.18 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 can be a nuisance to residents and visitors and can be particularly aggressive at certain times of the year.
- 3.6.19 All viable non-lethal steps should be taken on new development to prevent exacerbation of this problem. Gull mitigation measures should be considered from the outset to avoid the need for retro-fitted schemes which can be costly and disturb an established habitat.
- 3.6.20 Design advice and advice on suitable nonlethal mitigation measures can be found in Gulls – 'How to Stop Them Nesting on Your Roof', produced by Gloucester City Council, or any future iteration.

## **Policy F5: Open plan estates**

**Enclosure of front and side gardens and unusable strips of land will be allowed on existing open plan estates provided that the land to be enclosed does not adjoin a footpath link and its enclosure does not harm the visual amenity or community safety of the locality.**

- 3.6.21 Open plan estates have a unique character and appearance. Erecting fences and walls can erode this character and can create an unattractive piecemeal appearance to boundary treatments.
- 3.6.22 Extending the boundary treatment of gardens to incorporate amenity land can reduce the feeling of openness. When the boundary is adjacent to a footpath enclosing the surrounding amenity space can have a negative impact on visual amenity and community safety by narrowing the overall width of the footway and its landscaping. This can reduce views along the footpath and make the footpath feel more enclosed and less safe to use.

## **Policy F6: Nationally Described Space Standards**

**Planning permission for new residential development (including change of use or conversions) will be permitted where they meet Nationally Described Space Standards.**

- 3.6.23 The NPPF states makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for a variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.
- 3.6.24 Poor internal space is linked to poorer health (specifically mental health) and poorer educational achievement. Where new dwellings are created with sufficient internal space inhabitants are afforded a range of benefits including; the ability to better socialise with family members and guests, sufficient storage, greater flexibility in arranging rooms to suit need, the ability to work from home, space for effectively managing waste and recycling, adequate access to daylight and ventilation and allowance for adaptation should inhabitants suffer from permanent or temporary impaired mobility.
- 3.6.25 In respect of the above; development will be robustly assessed against the standards set out in Technical Housing Standards – Nationally Described Space Standard March 2015, or any standards revoking or superseding those standards.

# G: SUSTAINABLE LIVING, TRANSPORT AND INFRASTRUCTURE

## Introduction and context

- 3.7.1 This chapter addressed broad but important issues for Gloucester. The policies reflect the aspirations in City Plan Key Principles 2, 11 and 12. Everyone has a part to play and all residents of Gloucester must aim to live, work and travel in more sustainable ways. The realities of climate change and other forms of environmental damage and degradation are pushing these issues to the fore.
- 3.7.2 The chapter sets out policies focusing on sustainable transport, including two of the most sustainable forms which are walking and cycling. It also covers requirements for various forms of infrastructure and measures to improve the efficiency of communications and resource use.
- 3.7.3 The specific ways in which the plan addresses the challenge of climate change are set out below.

### Climate change

- 3.7.4 Climate change is happening now; it is the issue of our times that cannot be ignored. The City Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step-change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.
- 3.7.5 Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.
- 3.7.6 Climate change is a theme that runs through the whole of GCP and is a Strategic Objective of the JCS. A number of policies in this plan address climate change and its impacts either directly or indirectly. These include:
- Requiring new developments to make overall improvements to the natural environment (Policy A1)
  - Protecting existing trees, woodlands, hedgerows and ensuring every opportunity is taken to increase new planting. (Policy E4)
  - Requiring development to contribute towards the protection and enhancement of the Green Infrastructure Network. (Policy E5)
  - Requiring major development to be designed in accordance with 'Building with Nature'. (Policy E5)

- Requiring developments are safe from flooding and contribute to flood risk betterment. (Policy E6)
- Requiring all development to incorporate SUDs and facilitate watercourse reconstruction. (Policy E6)
- Ensuring appropriate attenuation volume rates to allow for the increased rainfall from climate change. (Policy E6)
- Supporting the use of the River Severn and canal for renewable energy generation. (Policy E7)
- Requiring new landscape and planting to be climate change adaptable. (Policy F2)
- Requiring development proposals to conserve and provide net gains to biodiversity. (Policy E2)
- Requiring electric vehicle charging points in every new home with a garage or on plot parking space, and 2% of spaces within 100 or more car parking spaces. (Policy G3)
- Protecting and improving cycle lanes and maximising opportunities for sustainable active travel. (Policy C1, G4, G5)
- Introducing the enhanced water efficiency standards reducing water consumption for each new home. (Policy G8)
- Protecting allotments and providing new allotments where there is a need. (Policy C2)
- Using green infrastructure to absorb dust and air pollutants from major developments, and increasing planting in AQMA, and around schools and hospitals. (Policy C5)

3.7.7 The City Council strongly supports proposals that incorporate sustainable design and construction measures, including renewable energy generation within new development and within development sites.

3.7.8 Policies SD3: Sustainable Design and Construction, SD4: Design Requirements, INF2: Flood Risk Management, and INF3: Green Infrastructure of the JCS also provide climate change requirements.

3.7.9 This policy also links to the recently published the Gloucestershire Energy Strategy 2019 <https://www.gfirstlep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf> This strategy sets out nine key building blocks. The fifth is: Developing Stronger Planning Policies. These policies should “...enable more local renewables and require zero-carbon and smart enabled new developments. To meet long-term targets, new planning policies need (a) to ensure that all new developments contribute to reducing carbon emissions rather than increasing them and are resilient to climate change and (b) to enable the growth of renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities.’

## Policy G1: Sustainable transport

**The Council will work closely with Gloucestershire County Council and other organisations regarding all local transport matters. The Council will take direction from both the Transport Implementation Strategy and policies of the JCS and the Gloucestershire Local Transport Plan 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 Local Transport Plan will also be used for development management matters and planning application decision making.**

**New development shall provide car parking and cycle provision in accordance with the latest version of Gloucestershire Manual for Streets and any subsequent amendments.**

**The City Council strongly supports and encourages improvements to the sustainable transport network.**

- 3.7.10 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 Gloucestershire Local Transport Plan performs this role better than the GCP 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.
- 3.7.11 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 sections of this plan.

## **Policy G2: Charging infrastructure for electric vehicles**

**An electric vehicle charging point/socket should be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage.**

**In all other new residential properties, the provision of electric vehicle charging points/sockets will be strongly encouraged where, in the opinion of the City Council, it is reasonable to do so and where it is technically feasible.**

**For non-residential development which provides 100 or more car parking bays, at least 2% of bays should be utilised for the provision of rapid charging points for electric vehicles. Exceptions will only be made where the applicant can demonstrate the local electricity network is technically unable to support this.**

- 3.7.12 JCS Policy SD4 'Design requirements' promotes, where feasible, facilities for charging plug-in and other ultra-low emission vehicles for the scale of development where a masterplan is required. The GCP builds on this, based on the following:
- The NPPF (2019) at Para 105 encourages policies to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicles.
  - Under Government plans, the sale of new petrol and diesel vehicle will be prohibited by 2040 and possibly sooner.
  - Global vehicle manufacturers are already making a major shift to electric or hybrid vehicle production and during the plan period there is likely to be major technological

change at a rapid pace. Towns and cities across the UK are putting in new infrastructure and Gloucester cannot afford to get left behind.

- Meeting targets outlined in the Government’s 25 Year Environment Plan especially relating to ‘Clean air’ and ‘Mitigating and adapting to climate change’.
- Existing air quality issues within the city, including the existence of four Air Quality Management Areas.

3.7.13 In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a single phase 13-amp socket. This is likely to be upgraded by the homeowner as technologies change.

3.7.14 Exemptions are made for residential flats/apartments and residential care homes with communal parking areas where, due to high costs and issues of security, servicing and maintenance it may not always be suitable or feasible to require charging points.

### Policy G3: Cycling

**Cycle lanes and paths that make up Gloucester’s existing cycle network will be protected and development that promotes new routes and improved cycle security will be encouraged.**

**The Council wish to encourage comprehensive city-wide cycling initiatives in line with the County Council’s Local Transport Plan. Working with Gloucestershire County Council and other partners, the Council will support development leading to:**

- 1. Improvement of cycle routes to sustainable transport hubs.**
- 2. Cycle access improvements to the:**
  - a. Outer ring road corridor in Gloucester**
  - b. Canal towpath**
  - c. A40 corridor between Gloucester and Cheltenham.**

3.7.15 Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards reducing carbon emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently.

3.7.16 The extent of Gloucester’s existing cycle lanes and paths are outlined in the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017). The four priorities highlighted in the policy reflect recent work undertaken by the County and City Council and the project delivery priorities on page 23 of the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017).

### Policy G4: Walking



**The City Council will support development that protects and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council's administrative boundary.**

**New footpaths that link neighbourhoods to each other and to areas of open space and Green Infrastructure will be supported subject to acceptability against other plan policies. Working with Gloucestershire County Council and other partners, the City Council will support development leading to the improvement of walking routes to sustainable transport hubs.**

**New public realm development should reflect the fact that pedestrians are at the top of the road user's hierarchy.**

**Proposals that disrupt walking desire lines, reduce the pedestrian legibility or reduce pedestrian connectivity will not generally be supported.**

- 3.7.17 For most people walking as a leisure activity or as a means of getting about is an important part of daily life. Gloucester is a relatively small city which is also quite flat, and it is possible to walk right across the city in a reasonable time frame.
- 3.7.18 Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car.
- 3.7.19 Working together the City Council and Gloucestershire County Council are particularly keen to promote improvements in walking routes to sustainable transport hubs i.e. the new bus station and railway station.

## **Policy G5: Broadband connectivity**

**All new residential and commercial development must be served by a high speed, reliable full-fibre broadband connection. The connection must reach each dwelling unit and commercial premise.**

**Exceptions may only be made where applicants are able to demonstrate through consultation with broadband infrastructure providers that this would not be possible, practical or economically viable.**

- 3.7.20 Access to high speed broadband and uninterrupted connected is a fundamental of modern living and working. However, there are still instances where new homes and business units have been built within high speed broadband connectivity.
- 3.7.21 The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-fibre broadband by 2025.

## Policy G6: Telecommunications infrastructure

**Planning permission for telecommunications infrastructure will be permitted where it can be demonstrated that the development would not have an adverse impact upon the environment (including heritage assets, biodiversity, local amenity, the landscape and its setting).**

**In siting any equipment, every effort must be made to minimise visual impact. Proposals will be expected to use/share existing structures of buildings where possible.**

**Where an installation becomes redundant for telecommunication purposes, the infrastructure and all associated apparatus and structures shall be removed by the developer or operator, and the site reinstated in accordance with proposals approved at the application stage.**

- 3.7.22 The City Council supports the introduction of modern communications networks, which are essential to support the growing demand for improved communications. However, this has land-use implications in the form of structures such as masts, aerials and satellite dishes and this in turn has implications for the surrounding area.
- 3.7.23 Planning applications for new telecommunications infrastructure will be required to balance environmental, visual, amenity and health concerns with the future development needs of the mobile technology networks. Mobile phone masts and antennas should always be located and designed to respect their context and the amenity of those living, working or spending time in the locality.
- 3.7.24 Well-designed telecommunications equipment might be painted an appropriate colour to relate to background and surroundings or existing features. Prominent building-mounted antennas and equipment might be appropriately disguised and camouflaged to blend in with the building and streetscape. Equipment cabinets should be kept to a minimum and should be as small and unobtrusive as reasonably practical.
- 3.7.25 Where proposed development may affect a footpath or the public highway, applicants should have regard to how equipment siting may affect pedestrian movements and visibility splays for all highway users. Good, safe access for service vehicles to the proposed apparatus should also be demonstrated. The City Council will consult the highway authority on these matters where appropriate.

## Policy G7: Water Efficiency

**Development proposals should demonstrate that the estimated consumption of wholesome water per dwellings should not exceed 110 litres of water per person per day.**

- 3.7.26 The NPPF sets out that plans should take a proactive approach to mitigating and adapting to climate change, taking into account long-term implications for flood risk, water supply,

biodiversity and landscapes. Gloucester City lies within the Severn Trent Strategic Grid area, which has been identified as 'high vulnerability' within the Water Resource Management Plan (2019). It is therefore important that the amount of water used is reduced and that new developments install water efficient fitting and appliances in new homes. More generally, improved water efficiency provides wider benefits to the water cycle and environment.

## Policy G8: Review mechanism

**Where planning policies cannot be immediately met by a development, due to wholly exceptional circumstances, a review mechanism shall be imposed for phased developments to ensure the ability of the development to comply with the relevant policies over the lifetime of the project is rigorously tested.**

- 3.7.27 The viability of the policies contained within this plan and the JCS have been tested in accordance with the NPPF and NPPG. The policies and the contributions expected from development should be assumed viable.
- 3.7.28 The applicant would need to demonstrate whether there are any wholly exceptional circumstances that justify the need for a further viability assessment at the application stage. Such circumstances may include a site coming forward that was not part of the 24 typologies tested as part of the whole plan viability assessment, or a significant regional economic change. The applicant would need to provide robust evidence of the changes that have occurred.
- 3.7.29 Priority will be given to the delivery of affordable homes over other policy requirements.
- 3.7.30 A review mechanism will be implemented through a S106 process. This is likely to require an independent review of the site viability at regular practical intervals and shall be funded by the developer.

## 4. SITE ALLOCATIONS

### Introduction and context

#### Gloucester's development needs and strategy

- 4.1 The city's development needs are set by the Adopted Joint Core Strategy. Between 2011 and 2031, the development needs are;
- Policy SP1: 14,357 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, 192 hectares of B-Class employment land to support approximately 39,500 new jobs.
  - Policy SP2: Circa 45,000 sq m (net) of new retail floorspace.
- 4.2 The Gloucestershire Gypsy and Traveller Accommodation Assessment (2016) identifies a need of two Gypsy pitches and 16 Travelling Showpeople plots arising from Gloucester's existing communities.
- 4.3 The JCS delivery strategy, as set out in Policy SP2, is for the delivery of development by maximising urban capacity and the identification of urban extensions (strategic allocations) to the main urban areas of Gloucester and Cheltenham. Most strategic allocations are in Tewkesbury Borough; this reflects the fact that Gloucester has a very limited land supply and in order to meet development needs, it has been necessary to work under the duty to cooperate to identify urban extensions in an adjoining authority. One strategic allocation, Winnycroft, is located within the administrative area of Gloucester City.

#### Delivery

- 4.4 A significant proportion of Gloucester's development needs will be delivered through 'Strategic Allocations' in the Adopted JCS. Likewise, they will make a substantial contribution to the need for employment land for the wider JCS area.
- 4.5 That said, a substantial proportion will be provided for within Gloucester's administrative area. Some of the needs within the plan period have already been delivered, having been granted planning permission and already built or under construction. Many more already have planning permission (known as 'commitments') and will be constructed over the next few years. In addition, the City Council makes an allowance for 'windfall' development; this is development that comes forward on sites that aren't allocated for development.
- 4.6 Further capacity is to be delivered through site allocations within the Gloucester City Plan (GCP). These have been identified through officer searches, call for sites, regeneration priorities and the brownfield register. All together the GCP makes 22 site allocations for residential development, employment development, mixed-use development, a school and community use. A summary of the site allocations is provided below:

Policy	Site	Allocation
SA01	Land at the Wheatridge	2 Form Entry Primary School and approximately 10 residential dwellings.
SA02	Land at Barnwood Manor	Approximately 30 residential dwellings.

SA03	Former Prospect House, 67 – 69 London Road	Approximately 30 residential dwellings.
SA04	Former Wessex House, Great Western Road	Approximately 20 residential dwellings.
SA05	Land at Great Western Road Sidings	Approximately 200 residential dwellings.
SA06	Blackbridge Sports and Community Hub	Multi-use sports, physical activity and community hub.
SA07	Lynton Fields, Land East of Waterwells Business Park	'B' class employment uses.
SA08	King's Quarter	Mixed use 'main town centre uses'.
SA09	Former Quayside House, Blackfriars	B1 offices, combined GP practice, pharmacy, approximately 50 residential dwellings.
SA10	Former Fleece Hotel / Longsmith Street Car Park	Mixed use 'main town centre uses' and approximately 25 residential dwellings.
SA11	Land rear of St Oswalds Retail Park	Approximately 300 residential dwellings.
SA12	Land at Rea Lane, Hempsted	Approximately 30 residential dwellings.
SA13	Former Colwell Youth and Community Centre	Approximately 20 residential dwellings.
SA14	Land off New Dawn View	Approximately 30 residential dwellings.
SA15	Land south of Winnycroft allocation	Approximately 30 residential dwellings.
SA16	Land off Lower Eastgate Street	Approximately 15 residential dwellings.
SA17	Land south of Triangle Park (Southern Railway Triangle).	B1 / B8 class employment uses.
SA18	Jordan's Brook House	Approximately 20 residential dwellings.
SA19	Land off Myers Road	Approximately 10 residential dwellings.
SA20	White City Replacement Community Facility.	Replacement community facility.
SA21	Part of West Quay, The Docks.	Mixed use 'main town centre uses' and approximately 20 residential dwellings.
SA22	Land adjacent to Secunda Way Industrial Estate	'B' class employment uses.

4.7 The potential capacity of a site to accommodate new development has been determined in one of two ways; the first is to draw on existing masterplans or proposal from which a realistic capacity can be identified; the second is to use a 'density calculation', where an allowance is made from the gross site area for infrastructure and community uses, and a calculation made of the likely capacity of the remainder.

- 4.8 In making the most efficient use of land, higher capacities have identified for site allocations where they are within or close to the city centre, near the transport hub (bus station and train station), and where appropriate in the context of the surrounding character and uses. In other locations, the capacity assumptions are based on a higher level 'suburban density' of 35 to 40 dwellings per hectare.

### ***Housing***

- 4.9 Gloucester city's housing delivery position, as of 31st March 2019, is summarised in the table below.

	<b>Gloucester City</b>	<b>Tewkesbury Borough</b>
JCS Strategic allocations (Tewkesbury Borough)	-	4,895
Winnycroft Strategic allocation (Gloucester City)	620	-
Completed	3,993	
Planning consents	2,339	-
'Windfall allowance'	832	-
Gloucester City Plan allocations	972	-
<b>TOTAL</b>	<b>13,651</b>	

- 4.10 Further information is available from the housing monitoring report (August 2019), available to download from the City Council's website.
- 4.11 Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to 900 dwellings. This shortfall is acknowledged and accepted within the Adopted JCS. Policy REV01 'Gloucester and Tewkesbury Housing Supply Review' states the need for an immediate review of housing supply and that 'The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities'.
- 4.12 The JCS Review has already commenced and further information is available from the JCS website – see paragraph 4.14 below.

### ***Employment land***

- 4.13 From an employment perspective, a total of 14.6 hectares is allocated, either as 100% B Class employment sites or as part of wider mixed-used schemes, but which will deliver a substantial amount of employment floorspace. Further information of available in the employment background paper, available to download from the City Council's website.

### ***Retail and city / town centres***

- 4.14 The JCS also sets out a need for retail development and Policy SP2 'Retail and City/Town Centres' sets out the current policy position. However, the policy is subject to an immediate review; criterion 7 of the policy states 'Following adoption of the JCS, this policy will be subject to an immediate review. The single-issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.' This review has already

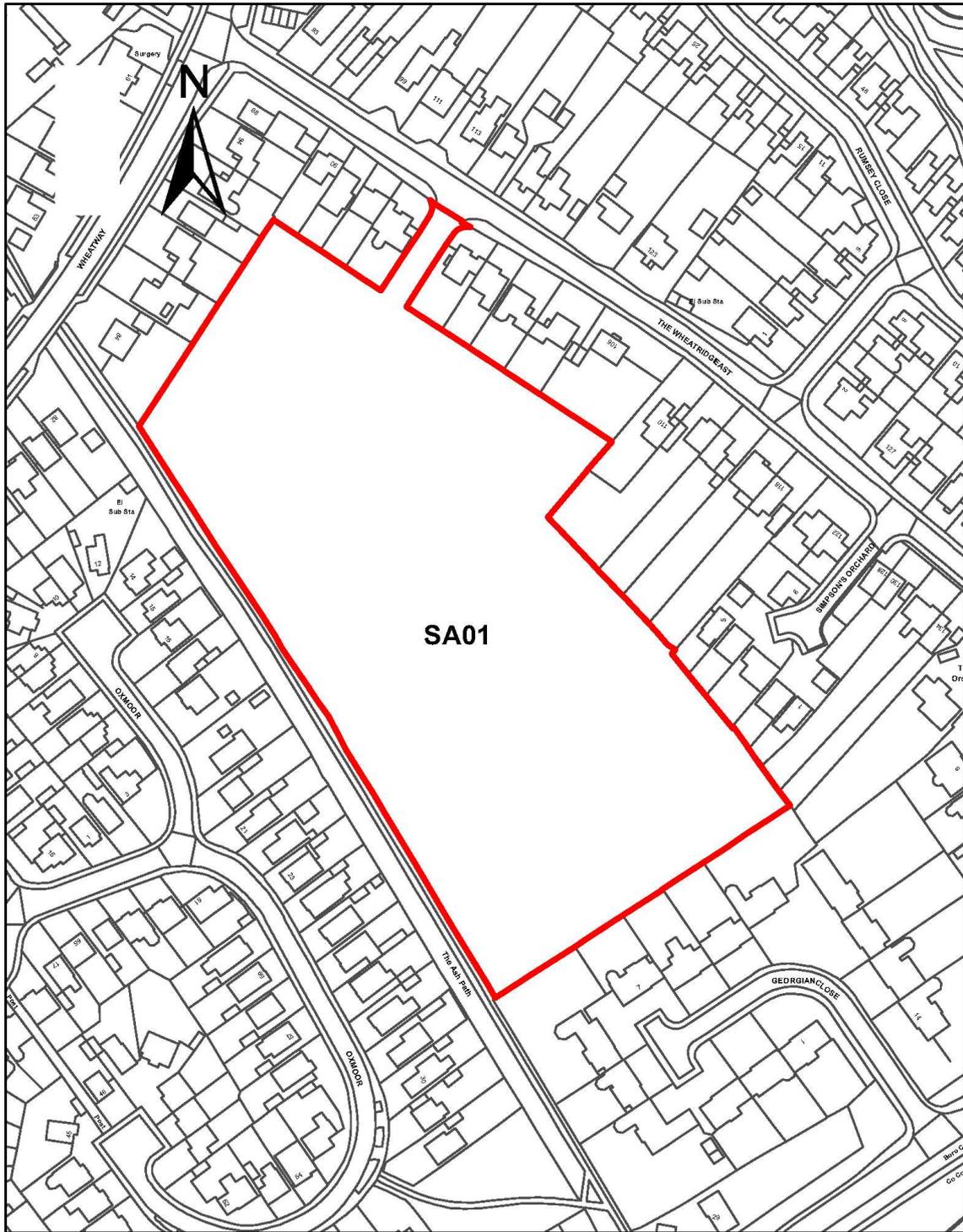
commenced, and consultants have appointed to undertake the necessary evidence to underpin it.

***Gypsy and traveller communities***

- 4.15 As identified above, there is a need for additional Gypsy and Travelling Showpeople accommodation to meet the needs of Gloucester's existing communities. The City Council has reviewed all possible site opportunities, including their own land assets, and it has been concluded there are none that are suitable, available or viable within the city. A request has been submitted to all neighbouring authorities, under the 'duty to cooperate', for help in identifying deliverable sites elsewhere.

## Policy SA01: Land at the Wheatridge

Ward / Postcode / GeoRef	SA01 / Abbeydale / GL4 5DF / E: 386060 N: 215495
Gross Site Area:	2.28 ha (Note: a minimum of 1.6 ha is required for a primary school).
Allocation:	Two Form Entry Primary School, plus approximately 10 residential dwellings.
<p><b><u>Description and overview</u></b></p> <p>Greenfield site located within Abbeymead to the east of the city in a predominantly residential area. The site was originally reserved for a primary school when the estate was originally granted planning permission but was not needed at that time. However, the County Council as education authority have now identified a potential need for a new Two Form Entry Primary School within the plan period, in response to housing growth in the wider area.</p> <p>In addition to the Primary School, in order to make the best use of the site, approximately ten additional dwellings can be accommodated within the site. A minimum of 1.6 hectares is required for the Primary School, the remaining land being available for residential development.</p> <p>The need for the Primary School is dependent upon regeneration initiatives at Matson coming forward. If these do not, it is accepted that the site can come forward for 100% residential development. In this case the Council would expect approximately 50 residential dwellings and open space to include a Locally Equipped Area for Play.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Maintain and increase tree cover across the site.</li> <li>• Connect with the Ash Path, providing overlooking whilst retaining the tranquillity of the path.</li> <li>• The layout of any buildings should be placed to reduce any negative impacts to the amenity of the neighbouring properties.</li> </ul> <p><b><u>Open space</u></b></p> <ul style="list-style-type: none"> <li>• A Two Form Entry Primary School doesn't require any specific open space; however, it will be required to include play space for pupils. If the site doesn't come forward for a Primary School and instead delivered approximately 50 new residential dwellings, the City Council expects new open space to include a Locally Equipped Area for Play in order to address a locally identified shortfall.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological assessment.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Improved connectivity to local areas of woodland including Hucclecote Meadow SSSI, possibly via the M5 embankment and farmland to the east of the M5. On site opportunities should be taken to implement species rich grassland and improvements to the species mix of hedgerows.</li> <li>• Bat survey: To assess their use of linear features such as hedges.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul>	

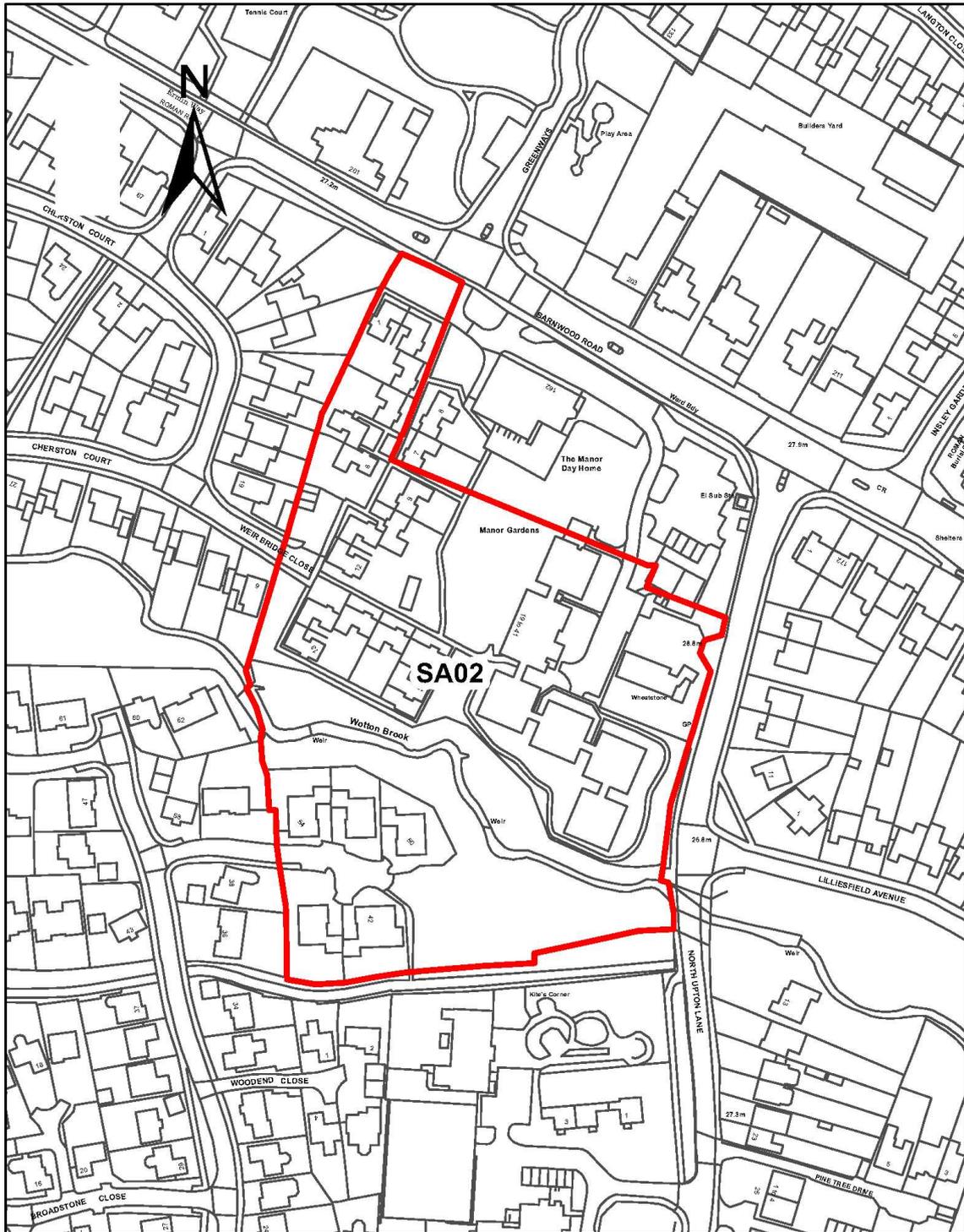


## Land at the Wheatridge

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## Policy SA02: Land at Barnwood Manor

Ward / Postcode / GeoRef	Barnwood / GL4 3JX / E: 386341 N: 217774
Gross Site Area:	1.95 ha.
Allocation:	Approximately 30 residential dwellings.
<p><b>Description and overview</b></p> <p>Occupied and functioning sheltered retirement accommodation. The nursing home is not included in the allocation and would remain as a fully functioning facility. The site is situated in a residential area and would provide the opportunity for the intensification of residential use, whilst protecting the setting of the listed manor building.</p>	
<p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• Increase density whilst maintaining the setting of the Listed Building.</li> <li>• Improve legibility and connective through the site between Barnwood Road and Barnwood Arboretum.</li> <li>• Improve frontage and overlooking to Barnwood Road and North Upton Lane. Maintain pedestrian access to Wotton Brook from the surrounding dwellings.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Built heritage and archaeological assessments.</li> <li>• Protection of the setting of the Listed Manor.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Improved Green Infrastructure corridor through to Barnwood Arboretum / Park and Local Wildlife Site (LWS).</li> <li>• Retention of naturalised watercourse.</li> <li>• Lighting scheme that retains darkness to protect local otter population using Wotton Brook.</li> <li>• Bats survey: Building inspections (and any required emergence/re-entry surveys) and activity survey.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Otter and water voles survey: Survey of watercourse for recent evidence of presence.</li> <li>• Reptiles: To assess presence.</li> </ul> <p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> </ul>	

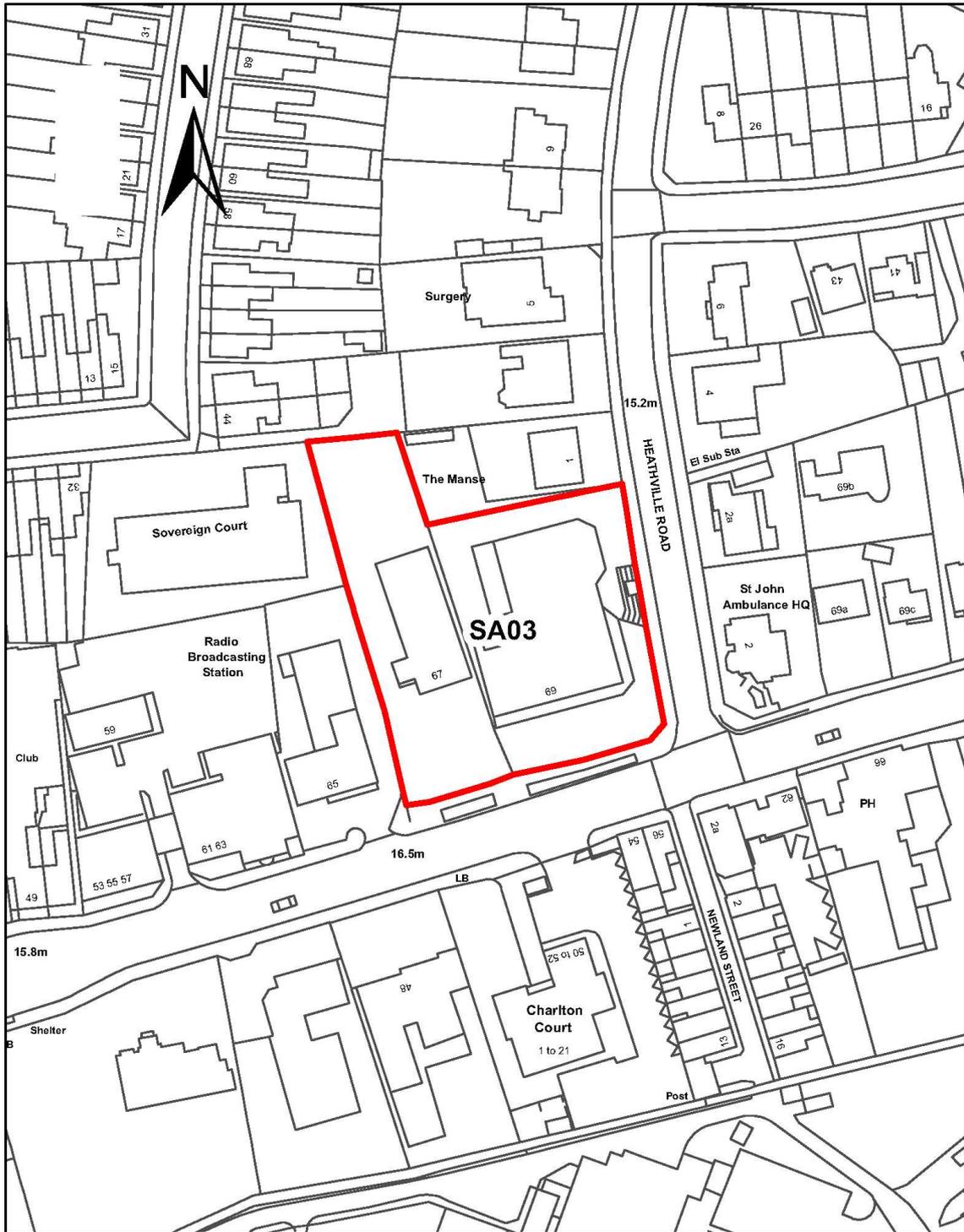


### Land at Barnwood Manor

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## Policy SA03: Former Prospect House, 67-69 London Road

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3HF / E: 383906 N: 218911
Gross Site Area:	0.35 ha.
Allocation:	Approximately 30 residential dwellings. There is an expectation that the main existing building will be refurbished/repurposed.
<p><b><u>Description and overview</u></b></p> <p>A redundant office block in a prominent location on the corner of London Road and Heathville Road. The premises have been marketed by the landowner for a considerable period but have been vacant for several years. The site offers the opportunity for the redevelopment to provide a higher density residential scheme, in a location supported by high frequency public transport and near to the city centre and public transport hub.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Improve the architectural appearance of the buildings and the streetscene.</li> <li>• Careful consideration to be given to the relationship between the site and the existing residential properties on Heathville Road. Improve the public realm along London Road.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Site located within the London Road Conservation Area; new development must therefore positively respond to the London Road Conservation Area Appraisal and Management document.</li> <li>• Archaeological Assessment given proximity of location to Roman Road.</li> <li>• Refer to detailed Site Historic Environment Assessment (November 2016) which concludes that development would be allowed with mitigation.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul>	

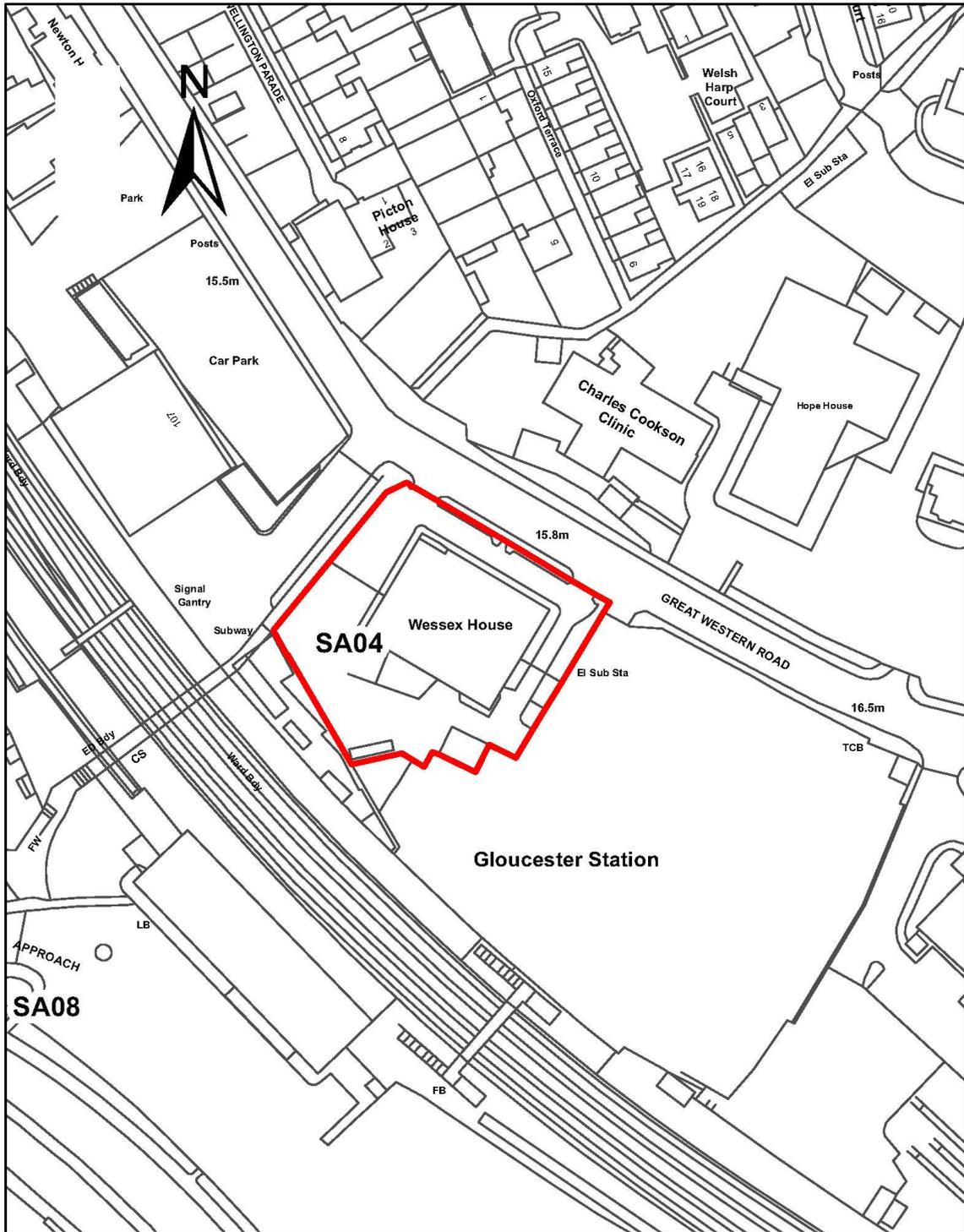


**Former Prospect House, 67-69 London Road**

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## Policy SA04: Former Wessex House, Great Western Road

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3NF / E: 383701 N: 218632
Gross Site Area:	0.3 ha.
Allocation:	Approximately 20 residential dwellings, temporary accommodation or mixed use.
<p><b><u>Description and overview</u></b></p> <p>A small, strategically located site close to Great Western Road underpass. Current building 'Edmundson Electrical' in the centre of the site is severely dilapidated and in need of demolition in order to facilitate development. The site offers the opportunity for higher density residential development or mixed-use given its very close proximity to the city centre and transport hub.</p> <p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• The site should be laid-out to provide direct overlooking and create active frontages to Great Western Road and the adjacent underpass.</li> <li>• Opportunity to widen the entrance into the underpass and create improved visibility.</li> <li>• Green buffer to be created alongside adjacent railway to mitigate against noise and air pollution from the railway.</li> <li>• Clearly defined public and private space, and appropriate boundary treatments will be important around the underpass.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological assessment.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul>	



## Wessex House, Great Western Road

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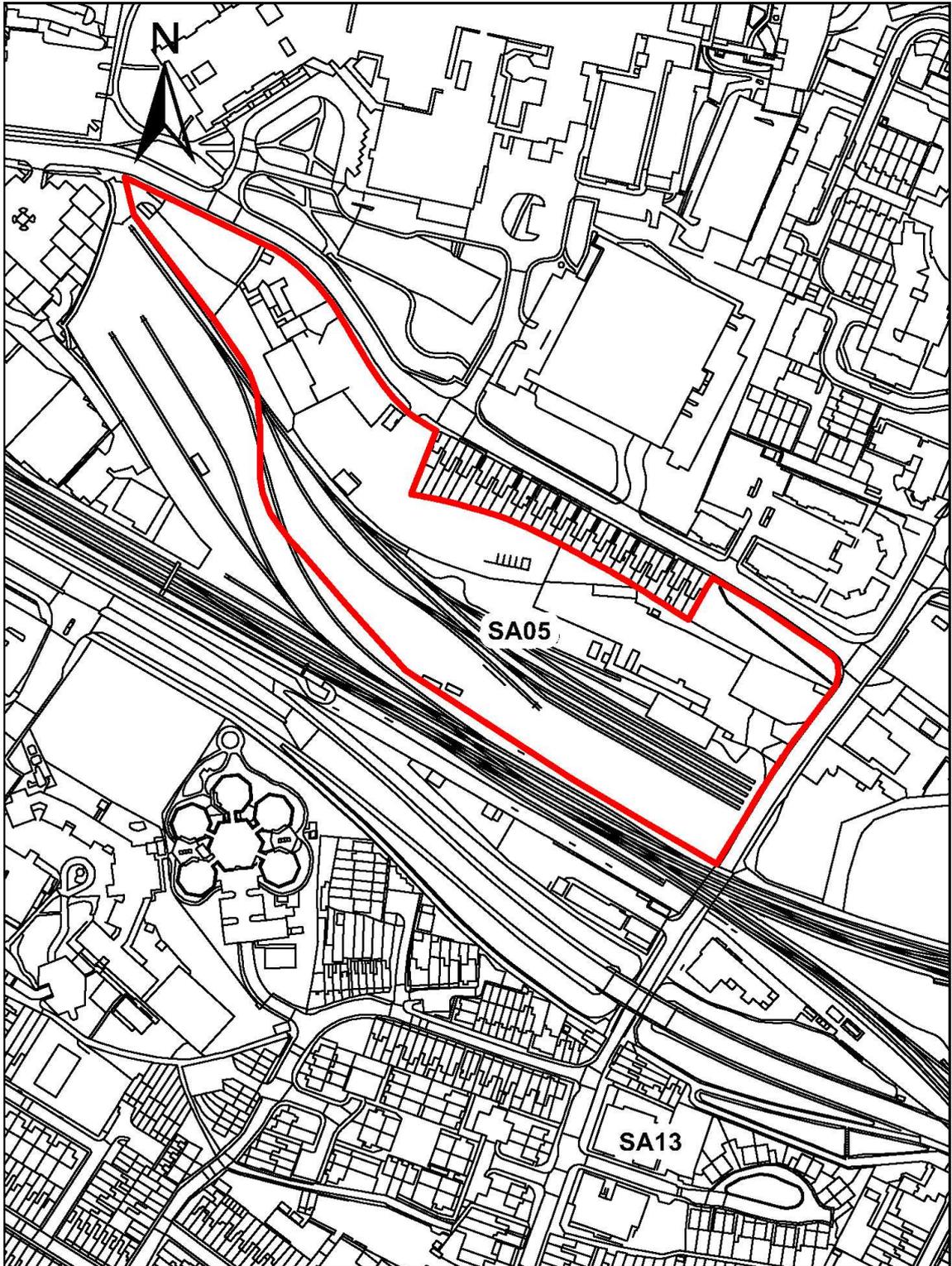
## Policy SA05: Land at Great Western Road Sidings

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3PZ / E: 384152 N: 218365
Gross Site Area:	4.3 ha.
Allocation:	Approximately 200 residential dwellings.
<p><b><u>Description and overview</u></b>            Large brownfield site; an area of railway sidings close to Gloucestershire Royal Hospital on the junction of Great Western Road and Horton Road. The site offers the opportunity for a higher density scheme near the city centre and transport hub.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Create a well-defined built frontage to Great Western Road.</li> <li>• Create a green link between Great Western Road and the southern end of Horton Road.</li> <li>• Increase tree coverage and create a more meaningful useable open space that connects to the hospital and could be utilised by hospital visitors.</li> <li>• Provision of appropriate crossing point to access open space.</li> </ul> <p><b><u>Open space</u></b></p> <ul style="list-style-type: none"> <li>• The site includes existing green space known as the 'Great Western Road Rest Gardens'. This should be included and expanded within the wider redevelopment, to provide a functional area of open space including a Locally Equipped Area for Play.</li> </ul> <p><b><u>Highways and access</u></b></p> <ul style="list-style-type: none"> <li>• Implementation of a new strategic cycle and footway linking to city centre and transport hub to the west and the new residential development at the Allstone site to the east.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Built heritage and ecological assessments.</li> <li>• Presence of historic steam engine shed is a non-designated heritage asset.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Creation of green corridor following the proposed walking/cycle route from Horton Road (with links to the Allstone site / Armscroft Park), through the sidings towards former Wessex House and railway station.</li> <li>• Creation of bat habitat/roosts.</li> <li>• Likely presence of nationally scarce invertebrates; any loss of brownfield habitat should be mitigated through brown roofs.</li> <li>• Bat survey: Building inspections (and any required emergence/re-entry surveys) if any buildings are scheduled to be removed or altered.</li> <li>• Birds survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> <li>• Invertebrates survey: To determine presence of important habitats for invertebrates.</li> </ul> <p><b><u>Air Quality</u></b></p> <ul style="list-style-type: none"> <li>• Given the likely high density of development and the proximity of the site to existing potential sources of air pollution, all proposals for development should demonstrate their compliance in</li> </ul>	

meeting EU limit values and national objectives for air pollutants. The development must be consistent with the Local Air Quality Action Plan.

**Other**

- Regard to the City Council's adopted 'Railway Corridor' Planning Brief.



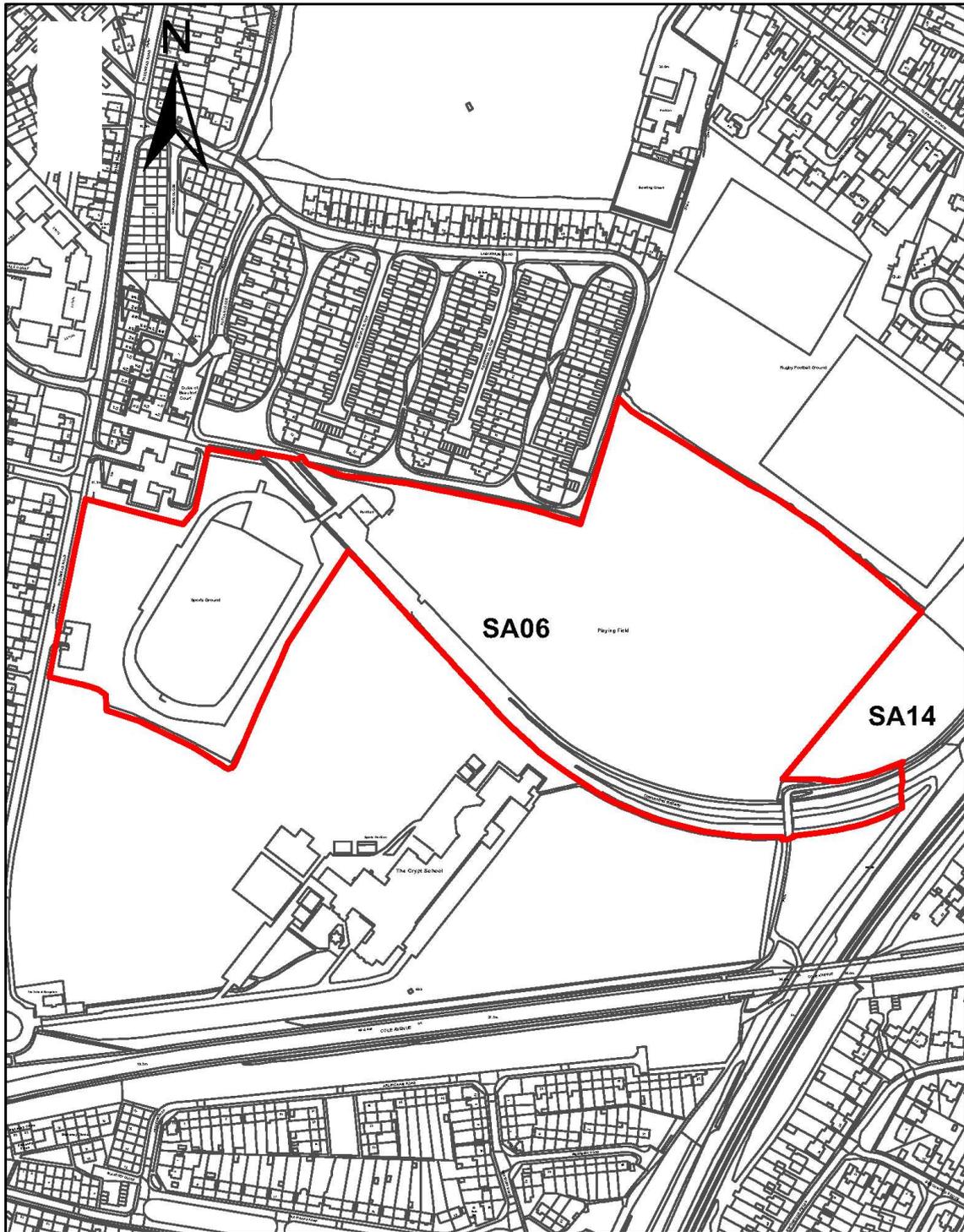
## Land at Great Western Road Sidings

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## Policy SA06: Blackbridge Sports and Community Hub

Ward / Postcode / GeoRef	Podsmead / GL1 5TY (closest) / E: 382935 N: 215862
Gross Site Area:	9.69 ha
Allocation:	Multi-use sports, physical activity and community hub, to include a full-sized 3G artificial surface, grass playing fields and a multi-use health and wellbeing facility.
<p><b><u>Description and overview</u></b></p> <p>Historically used as playing fields, this site has been identified in the Playing Pitch Strategy and Built Sports Facility Strategy as a priority for a multi-sports and community hub within the Podsmead community, but with a city-wide reach. It also provides opportunities for physical activity beyond formal sport. The development should include a multi-use health and wellbeing facility to provide for the needs of the local community and those arising from the delivery of sports facilities with the city-wide catchment.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Careful consideration needs to be given to the access route into the site and the boundary treatments.</li> <li>• An improved street presence and adequate parking will need to be provided.</li> <li>• Opportunity to improve visibility and instate a footpath to the eastern side of Podsmead Road.</li> <li>• Safe and secure routes will be needed between the facilities and its potential users.</li> </ul> <p><b><u>Gloucester Athletics Club</u></b></p> <ul style="list-style-type: none"> <li>• Incorporation of the adjacent Gloucester Athletics Club into the wider site to secure a seamless multi-sports venue. Protection of the amenity and facilities currently enjoyed by the club.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Any requirements for upfront information and mitigation would depend on the scale and impact of any proposal.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Incorporation of and improvements to the dismantled railway cutting, currently an extensive area of brambles, shrubs and small trees including apples and damson. This area forms a potential Local Wildlife Site and is identified as having considerable potential for enhancing local conservation value and protection/enhancement of a key ecological corridor within an urban environment.</li> </ul> <p><b><u>Flood risk</u></b></p> <ul style="list-style-type: none"> <li>• The site is located within flood zones and the redevelopment provides an opportunity for flood risk mitigation for the wider area. Any development should therefore implement Sustainable Drainage Systems (SuDS).</li> </ul>	

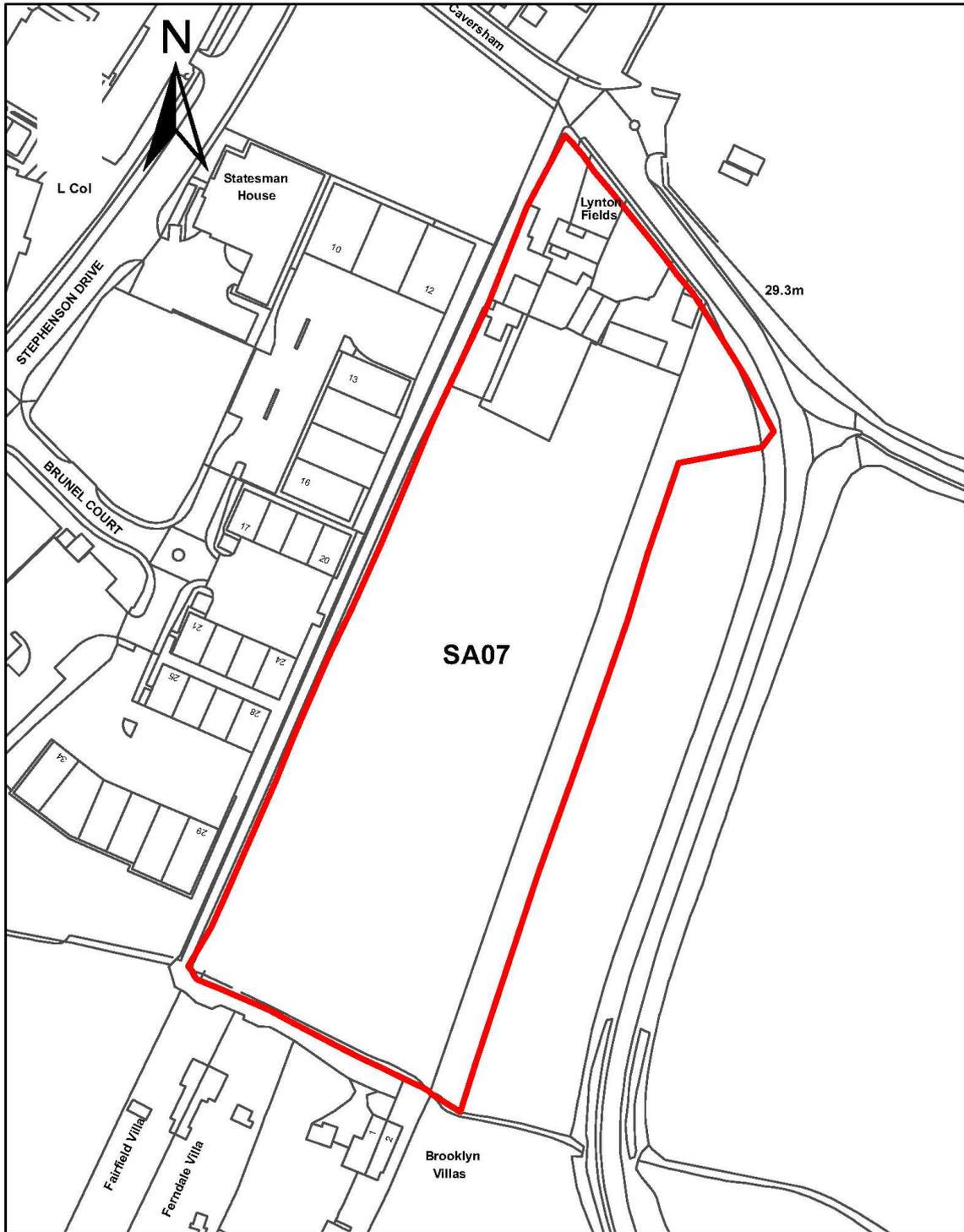


## Blackbridge Sports & Community Hub

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## Policy SA07: Lynton Fields, Land East of Waterwells Business Park

Ward / Postcode / GeoRef	Quedgeley Fieldcourt / GL2 2SF / E: 381831 N: 212615
Gross Site Area:	2.0 ha.
Allocation:	B Class employment uses
<p><b><u>Description and overview</u></b></p> <p>The site comprised mainly improved grassland with buildings related to the poultry business and to small scale industry. There are car storage facilities to the north and east, industrial buildings to the west and three large villas to the south. It is located to the east of the very successful Waterwells Business Park and offers the opportunity for an extension to this.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Any development should be laid-out to mitigate any potential impacts to the existing residential properties to the south of the site.</li> <li>• The transition between employment and residential will need to be carefully considered and appropriately designed.</li> <li>• Development should be set back from Nass Lane to preserve its character.</li> <li>• Potential for widening Nass Lane to provide footways and cycling routes should be fully explored.</li> <li>• Consider opportunities for improving public transport.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological Assessment.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Enhancement to species rich grassland connectivity through site and enhancement to watercourse.</li> <li>• Bat surveys: Building inspections (and any required emergence/re-entry surveys) and activity survey.</li> <li>• Bird surveys: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul> <p><b><u>Flood risk</u></b></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> </ul>	

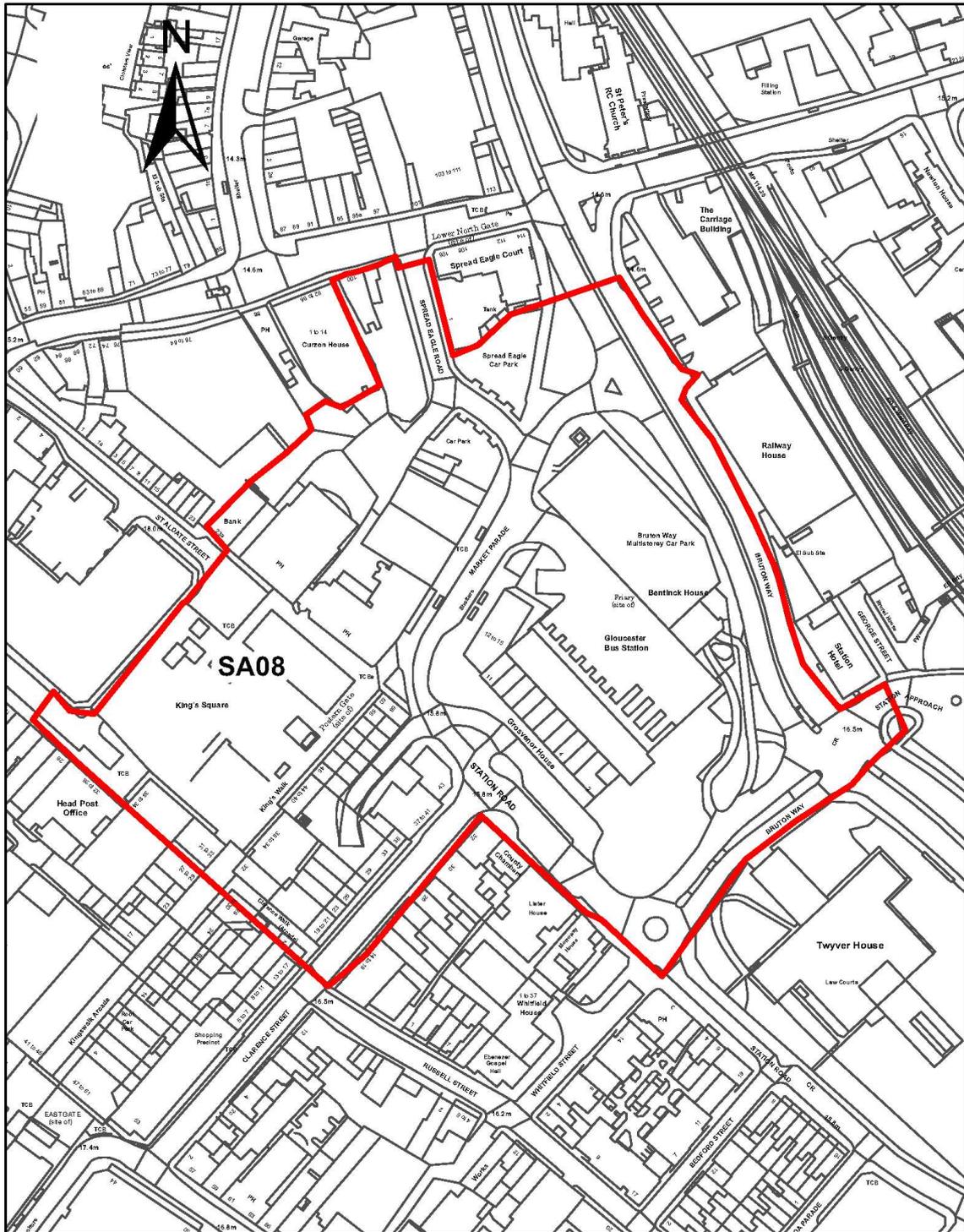


### Lynton Fields, Land East of Waterwells Business Park

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## Policy SA08: King's Quarter

Ward / Postcode / GeoRef	Westgate / GL1 1SZ / E: 383463 N: 218589
Gross Site Area:	4.5 ha.
Allocation:	Mixed use development: residential, retail, employment, hotel and leisure use, city centre parking.
<p><b><u>Description and overview</u></b></p> <p>King's Quarter is the City Council's top regeneration priority. The site is in the heart of the city centre and links the primary shopping area with the recently completed transport hub (bus station) and railway station. The site is substantial in size, comprising King's Square, The Oxbode and St Aldate Street, as well as parts of Northgate Street, Spread Eagle Road, Market Parade, Station Road and Bruton Way. King's Quarter has the opportunity to create lost connections between the bus and train stations, with a high-density mixed-use scheme of a range of different main town centre uses including commercial floorspace, a hotel, offices, residential dwellings and city centre parking.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Views to the Cathedral should be enhanced and maintained.</li> <li>• Direct connectivity between the bus and arail station across to Kingswalk, The Oxbode and St Aldates to be maintained.</li> <li>• Density should be increased particularly around the edges of any open spaces. The current height of building ratio to open space is incongruous.</li> </ul> <p><b><u>Open space</u></b></p> <ul style="list-style-type: none"> <li>• Retention and enhancement of King's Square as a multi-use events space and focus within the city centre.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Site located within the City Centre Conservation Area and adjacent to the London Road Conservation Area; new development must therefore positively respond to both Conservation Area Appraisal and Management documents.</li> <li>• Detailed Historic Environment Assessments: Potential for significant Roman and other era archaeological interest. The Scheduled Monument of Whitefriars is within the site area.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised on this site.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><b><u>Flood risk</u></b></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> </ul>	

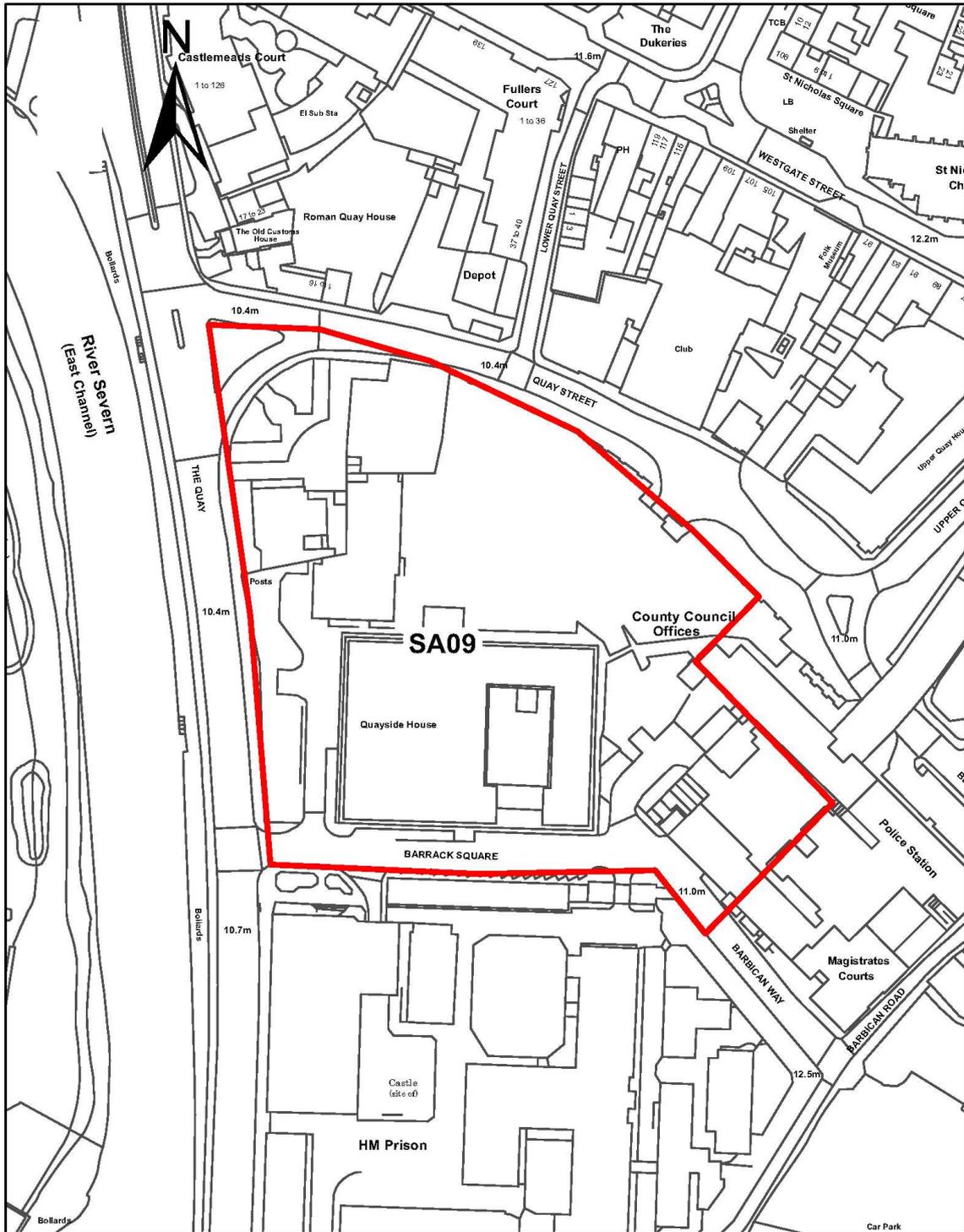


## Kings Quarter

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## Policy SA09: Former Quayside House, Blackfriars

Ward / Postcode / GeoRef	Westgate / GL1 2TZ / E: 382781 N: 218659
Gross Site Area:	1.6 ha.
Allocation:	B1 Class offices, Combined GP Practice, Pharmacy, Residential (approximately 50 dwellings)
<p><b><u>Description and overview</u></b>          Brownfield site adjacent to Shire Hall. Formerly the site was the location of Gloucestershire County Council offices 'Quayside House' but this has been demolished and is used in part for staff parking. The site provides the opportunity for a higher density scheme to provide additional office accommodation to meet the operational needs of the County Council, as well as a Combined GP Practice to provide for local need and approximately 50 residential dwellings.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Natural surveillance to key routes. Improved pedestrian permeability through the site.</li> <li>• Respect and respond to designated heritage assets of the former prison to the south.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological and built heritage assessments have been established and to some extent undertaken through the LDO (16/01510/LDO). It may be the case that further assessments are required, depending on the form of development proposed.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised on this site.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><b><u>Flood risk</u></b></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> </ul>	

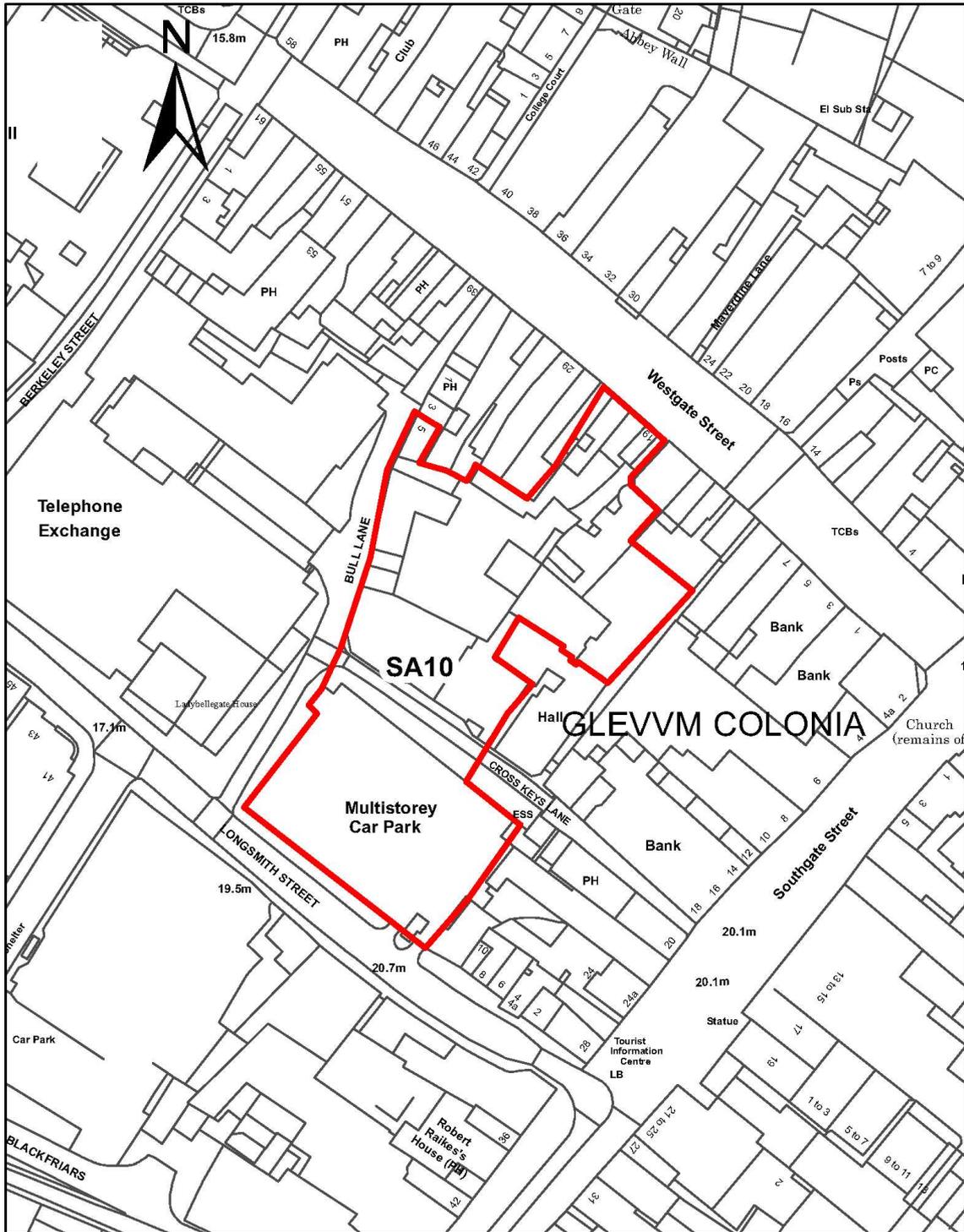


## Former Quayside House - Greater Blackfriars

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## Policy SA10: Former Fleece Hotel & Longsmith Street Car Park

Ward / Postcode / GeoRef	Westgate / GL1 2TZ (nearest) / E: 383056 N: 218561
Gross Site Area:	1.6 ha
Allocation:	Mixed use including approximately 25 residential units.
<p><b><u>Description and overview</u></b></p> <p>The Fleece complex is a centrally located historic site which is under-utilised and run down. It is comprised of a combination of important listed buildings, and a number of modern buildings all in poor condition within a tight urban grain. Longsmith Street car park is an operational City Council car park to the south west of the Fleece complex. The site offers the opportunity for a sensitive redevelopment to protect and enhance heritage assets, whilst delivering a mix of main town centre uses to support the vitality and viability in this key area of the city.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Opportunities to provide active frontages to Bull lane, Cross Keys Lane and Longsmith Street.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• This is a sensitive historical site. There is a requirement to refer to the City Council’s Concept Statement on all matters to do with built heritage and archaeology.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul>	



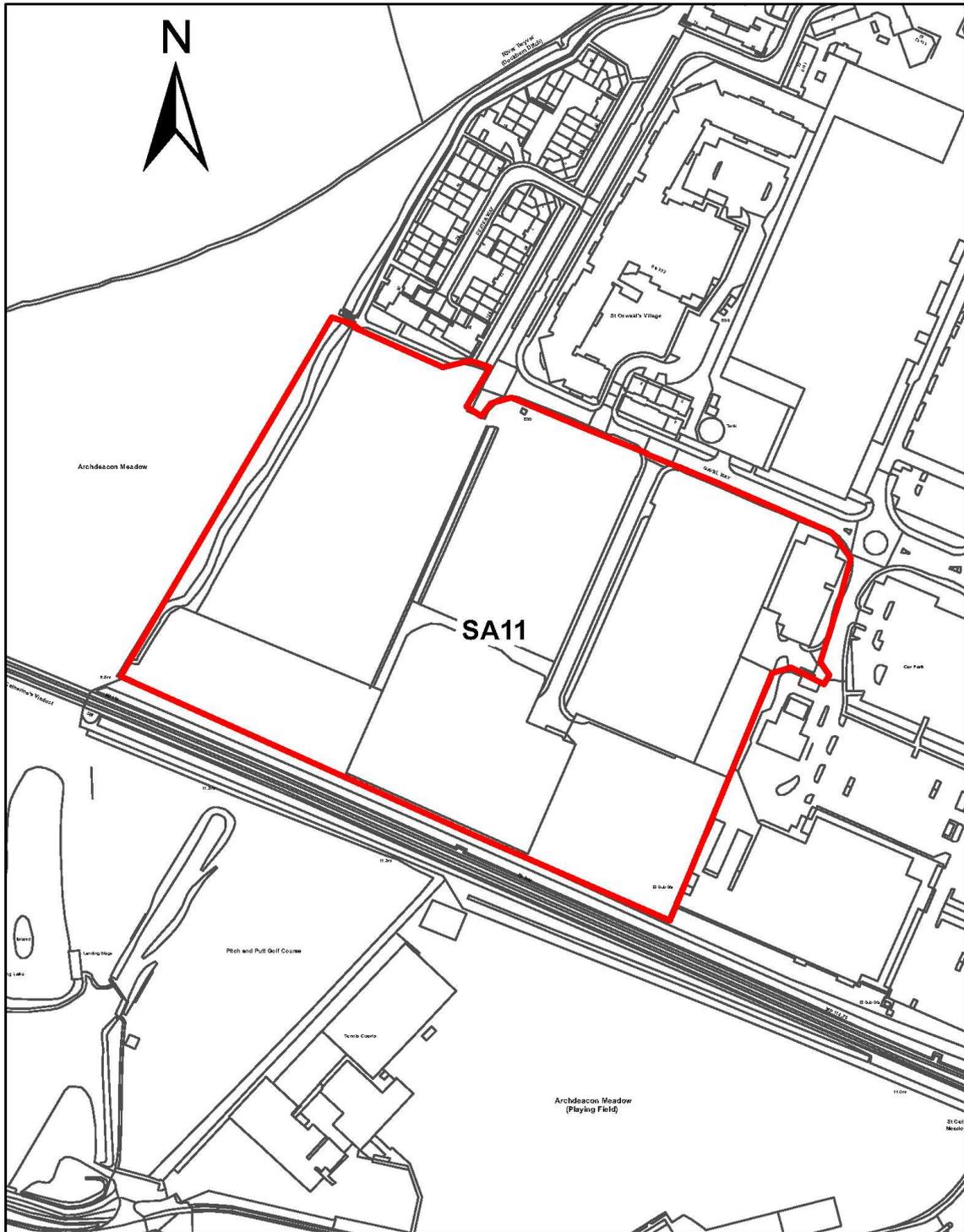
### Former Fleece Hotel and Longsmith Street Car Park

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## Policy SA11: Land rear of St Oswalds Retail Park

Ward / Postcode / GeoRef	Westgate / GL1 2SR / E: 382738 N: 219372
Gross Site Area:	6.44 ha.
Allocation:	Residential: Approximately 300 dwellings.
<p><b>Description and overview</b>            Large brownfield site to the west of the Tesco superstore at St Oswalds. A railway line runs the length of the southern boundary. To the north is residential development and older people's housing in the form of St Oswalds Village. To west of the site lies Archdeacon Meadow which is in the floodplain of the River Severn.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Provide/improve cycleways and pathways, including linkages and integration with the GI network and the provision of level pedestrian access to Westgate Park and Severn Way.</li> <li>• Opportunities to enhance green corridor along railway and create an appropriate buffer.</li> <li>• Routes should be created across the site to create a legible link from Westgate park to the adjacent retail uses.</li> <li>• Residential uses should be carefully sited to avoid conflict with the adjacent retail use.</li> <li>• Buildings located to make the most of views of the Cathedral and surrounding countryside.</li> </ul> <p><b><u>Open space</u></b></p> <ul style="list-style-type: none"> <li>• Provision of new open space to provide for the needs of the new community as well as to address identified shortfalls within the existing community at Dexter Way and Longhorn Avenue. To include a Locally Equipped Area for Play.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological Assessment: This is a former unregulated landfill site with made up ground and there is unknown archaeological potential.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Retention of some areas of brownfield habitat for brownfield species.</li> <li>• Creation of:               <ul style="list-style-type: none"> <li>○ Green habitat / landscaping suitable for invertebrates and reptiles.</li> <li>○ Nutrient poor dry conditions using rock, gravel, rubble encouraging high flower abundance of native nature rich species.</li> <li>○ Patches of bare ground, exposed earth banks, seasonally wet areas.</li> <li>○ Green and brown roofs will be required on some buildings.</li> </ul> </li> <li>• Bat survey: To assess their use of the site.</li> <li>• Bird survey: None, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul> <p><b><u>Air Quality</u></b></p> <ul style="list-style-type: none"> <li>• The site is in close proximity of Priory Road AQMA, all proposals for development should demonstrate their compliance in meeting EU limit values and national objectives for air pollutants. The development must be consistent with the Local Air Quality Action Plan.</li> </ul> <p><b><u>Flood risk</u></b></p>	

- **A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.**
- **Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).**

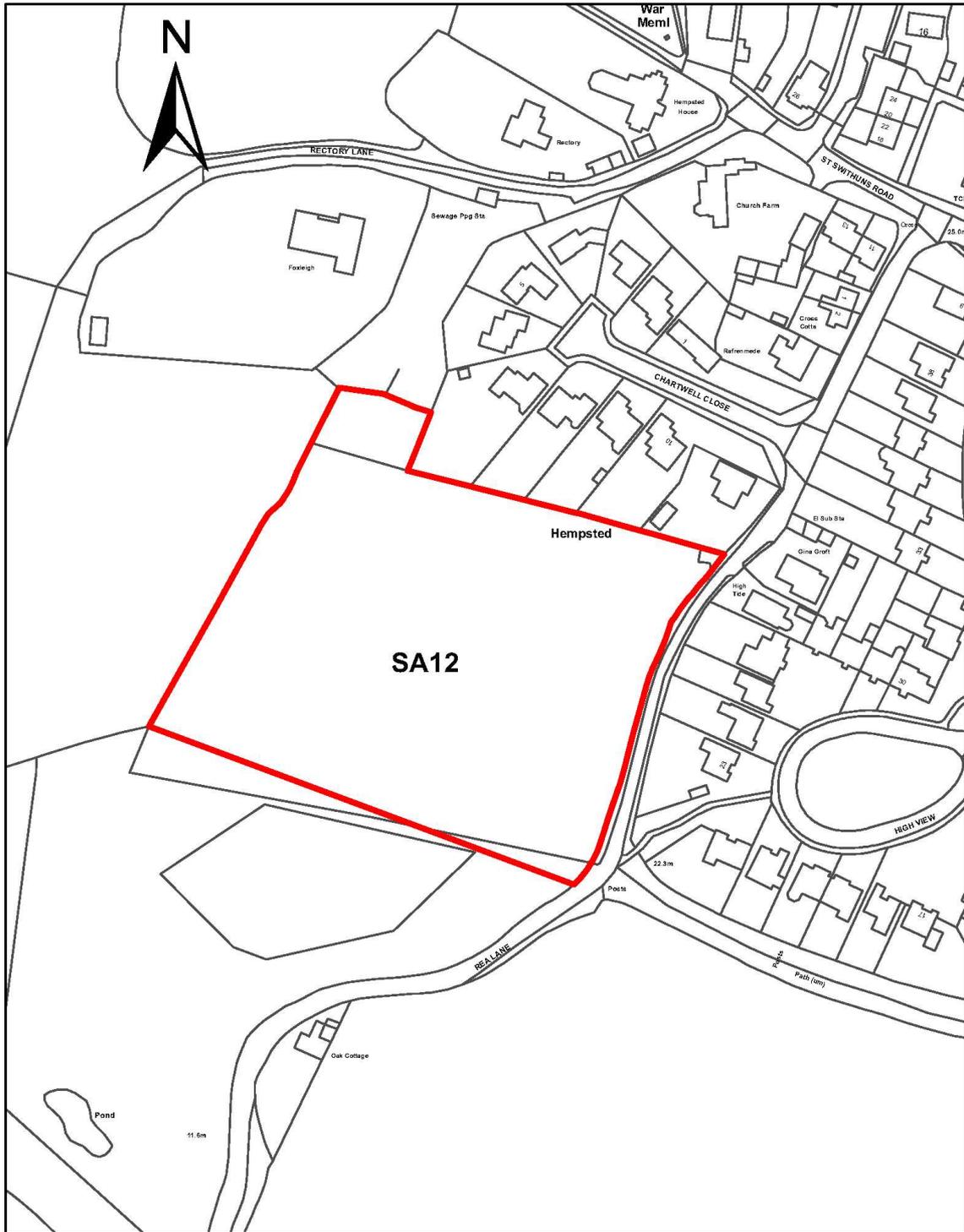


## Land at St Oswald's

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## Policy SA12: Land at Rea Lane, Hempsted

Ward / Postcode / GeoRef	Westgate / GL2 5XA / E: 381320 N: 216812
Gross Site Area:	1.2 ha.
Allocation:	Approximately 30 dwellings.
<b><u>Description and overview</u></b>	
Greenfield site on the edge of Hempsted village. The site offers the opportunity for a small residential development located on the edge of the city and outside of the cordon sanitaire.	
<b><u>Site specific requirements and opportunities</u></b>	
<b><u>Design and layout</u></b>	
<ul style="list-style-type: none"> <li>• Any development will need to respond sensitively to the landscape character of the area.</li> <li>• Buildings should be no more than two-storey and detailed with materials that complement the landscape.</li> <li>• Trees, hedgerows and SUDs should be utilised to soften the development and protect views into the site from the open countryside.</li> </ul>	
<b><u>Historic environment</u></b>	
<ul style="list-style-type: none"> <li>• Written scheme of Investigation for archaeological evaluation.</li> <li>• Mitigate potential impacts to the Hempsted Conservation Area and its setting.</li> </ul>	
<b><u>Biodiversity</u></b>	
<ul style="list-style-type: none"> <li>• The adjacent land has some potential for a Local Wildlife Site and opportunities should be explored. Orchard restoration is a possibility as there is restored orchard to the south and remnant orchard to the west. Additionally, improvements could focus on hedgerows, lowland meadow, coastal &amp; floodplain grazing marsh, wet woodland, pond and margins.</li> <li>• For the protection of hedgerows, foraging bats and breeding birds: A level of habitat protection and buffering. In terms of enhancement: Protection of sensitive habitats during construction. Enhancement of existing habitats through additional planting. Development of a sensitive lighting strategy to reduce light spill.</li> <li>• For the protection of badgers, breeding birds and hedgehog: Hedgerow retention and buffering, as well as provision of green open space. In terms of enhancement: Protection during construction, enhancement of existing habitats through additional planting (shrub and/or wildflower grassland). Provision of nesting boxes to increase opportunities for breeding birds, roosting boxes to increase opportunities for bats, and log piles to provide refuge and foraging for hedgehogs.</li> <li>• For the protection of Great crested newts and reptiles: Creation of new pond and species-rich wildflower grassland. Non-licenced avoidance measures to be included within an Ecological Construction Method Statement and provision of log piles to increase foraging and refuge opportunities.</li> </ul>	

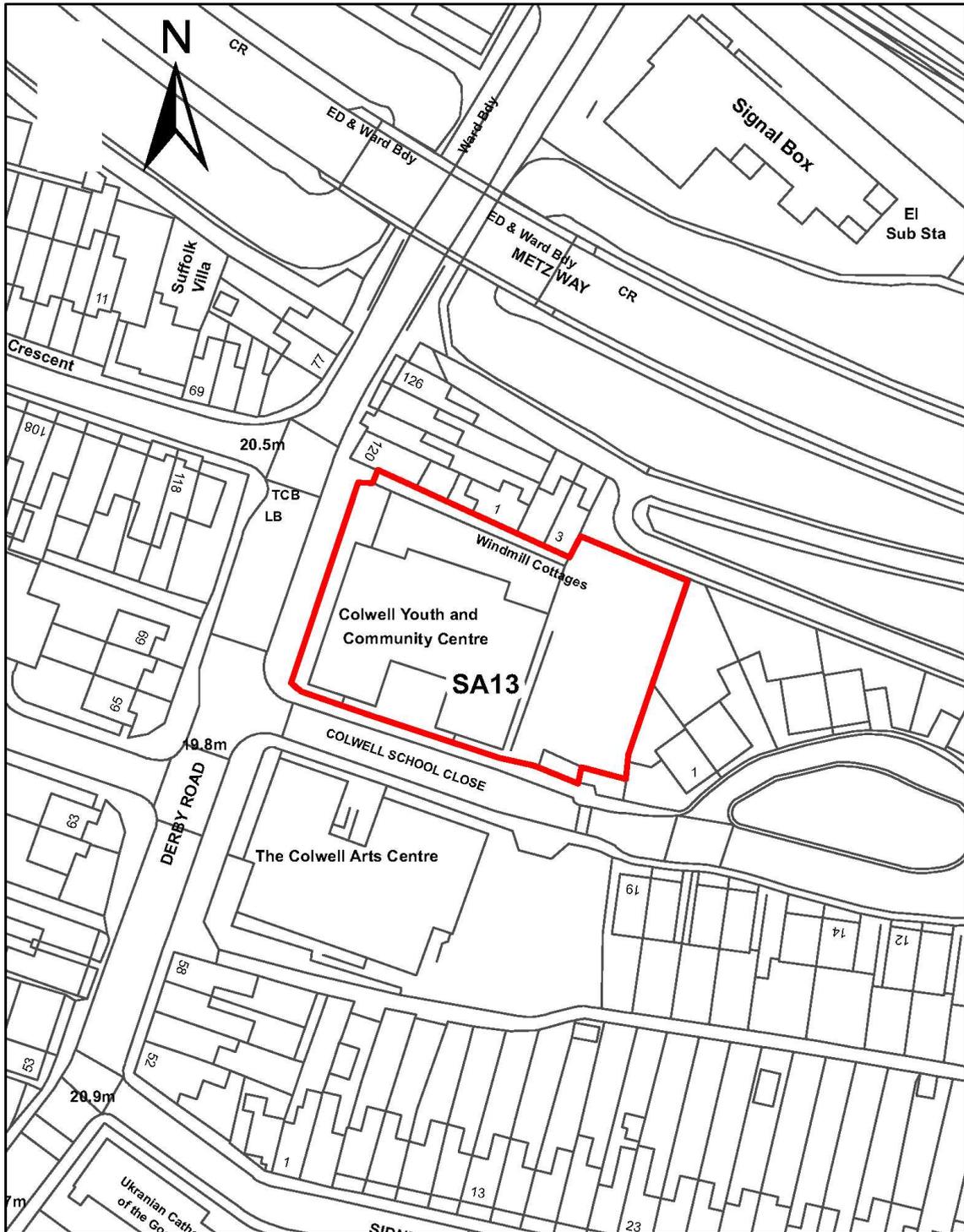


## Land at Rea lane

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## Policy SA13: Former Colwell Youth & Community Centre

Ward / Postcode / GeoRef	Barton & Tredworth / GL1 4BD (nearest Sydney Street) / E: 384220 N: 218107
Gross Site Area:	0.18 ha.
Allocation:	Residential: Approximately 20 dwellings.
<b><u>Description and overview</u></b>	
Redundant former school building and car park. The site provides the opportunity to provide new homes in a predominantly residential area. The building should be retained and converted.	
<b><u>Site specific requirements and opportunities</u></b>	
<b><u>Design and layout</u></b>	
<ul style="list-style-type: none"> <li>• The building and the boundary treatments should be preserved and enhanced to make the most of this attractive building that makes a positive contribution to the streetscene.</li> <li>• Any proposed new development to the car park area will need to be considerate to the amenity of the adjacent existing two-storey residential properties.</li> <li>• Overlooking of the pedestrian link to Metz way is encouraged provided it can be achieved whilst being sensitive to the amenity of the adjacent residential properties.</li> <li>• Any proposed solar panels to the roof will need to be assessed to ensure there is no glint caused to the users of the elevated roadway Metz Way.</li> </ul>	
<b><u>Historic environment</u></b>	
<ul style="list-style-type: none"> <li>• Existing building is considered a candidate for the 'Local List' in the City Council's Townscape Character Appraisal (2019).</li> <li>• Built Heritage Assessment of significance and character.</li> </ul>	
<b><u>Biodiversity</u></b>	
<ul style="list-style-type: none"> <li>• Incorporate green roofs or walls as part of any development of this site.</li> </ul>	

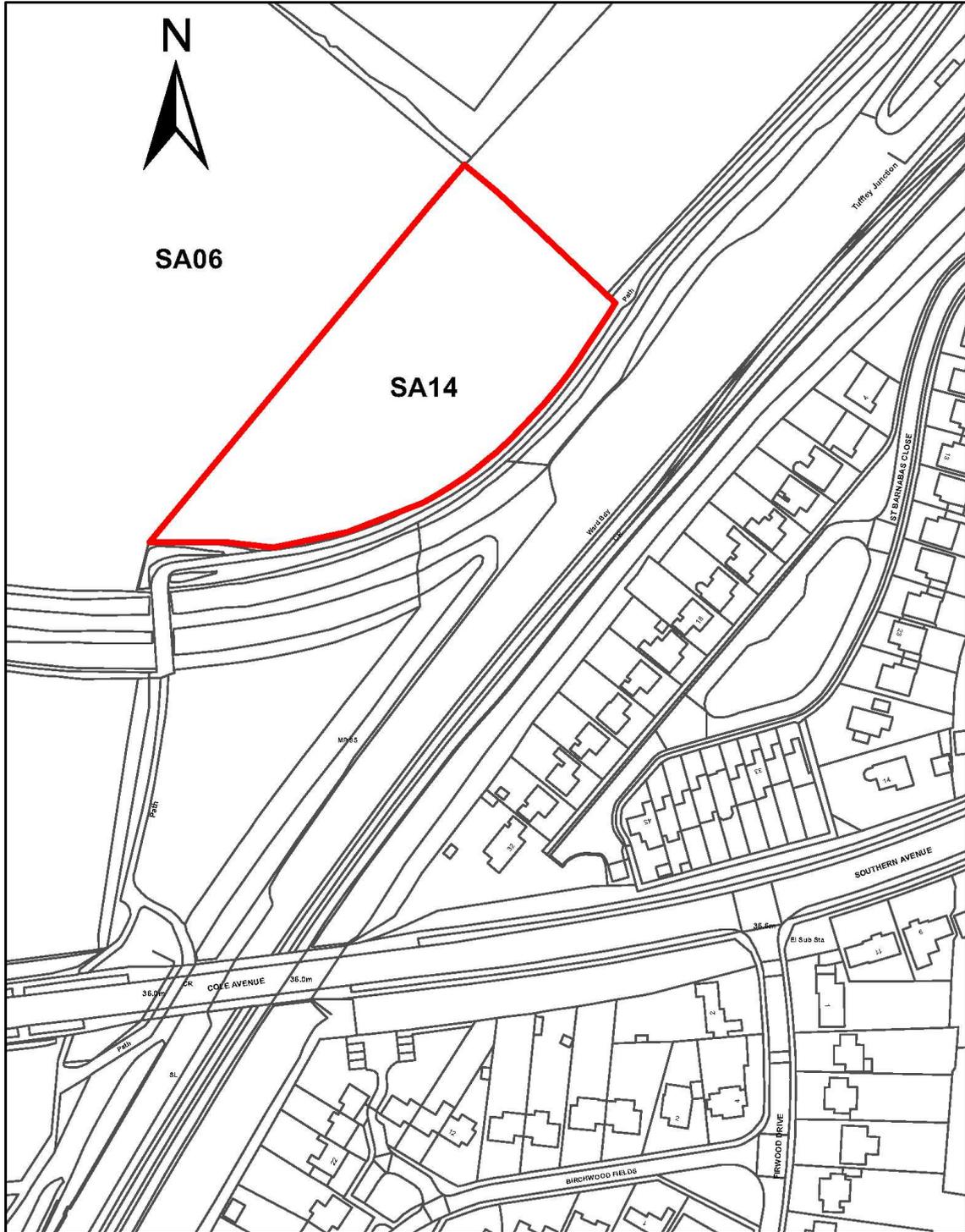


## Former Colwell Youth & Community Centre

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## Policy SA14: Land off New Dawn View

Ward / Postcode / GeoRef	Podsmead / GL1 5LH (nearest) / E: 383101 N: 215801
Gross Site Area:	0.8 ha.
Allocation:	Residential: Approximately 30 dwellings.
<p><b><u>Description and overview</u></b></p> <p>Green land adjacent to the allocation for the Blackbridge Sports and Community Hub (see allocation SA06). The site is accessed through an existing residential area and provides an opportunity for an extension to provide small number of new homes. The land currently forms playing field land as part of the wider Blackbridge site. The proposal to allow the loss of limited playing field land to support the delivery of the Blackbridge Sports and Community Hub (Policy SA06) is supported by the PPS Delivery Group. The use of a small part of the site for residential development releases the wider site to deliver significant net gains including a full-sized 3G pitch, grass pitches, a health and wellbeing building and opportunities for informal physical activity. On this basis, it is considered the proposal meets in whole or in part the Sport England exception tests relating to the loss of playing field land.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Layout should be designed to incorporate as much of the existing green infrastructure as possible.</li> <li>• Overlooking should be provided to the playing fields.</li> <li>• An existing network of green and active routes exists and provide wild food including: blackberries, damsons, sloes, and apples exists.</li> <li>• These routes and opportunities will need to be maintained for the purposes of health and wellbeing and biodiversity.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Requirements for upfront information and mitigation would depend on the scale and impact of proposals.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Incorporation of and improvements to the dismantled railway cutting, currently an extensive area of brambles, shrubs and small trees including apples and damson. This area forms a potential Local Wildlife Site and is identified as having considerable potential for enhancing local conservation value and protection/enhancement of a key ecological corridor within an urban environment.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> </ul>	

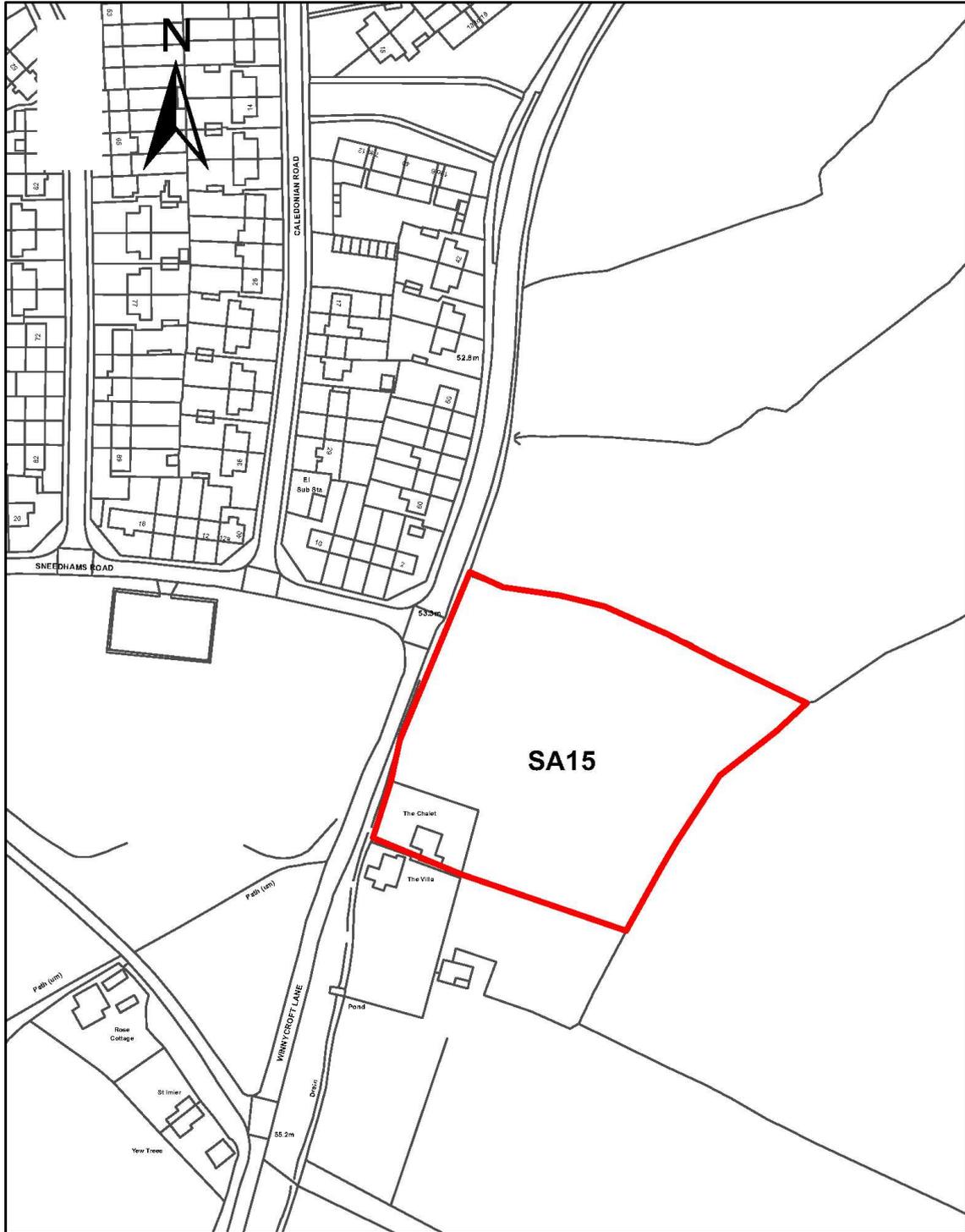


**Land off new Dawn View**

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## Policy SA15: Land South West of Winneycroft Allocation

Ward / Postcode / GeoRef	Matson & Robinswood / GL4 6HY (nearest) / E: 385108 N: 214493
Gross Site Area:	0.86 ha.
Allocation:	Approximately 30 residential dwellings.
<p><b><u>Description and overview</u></b></p> <p>Greenfield site on the eastern side of Winneycroft Lane, broadly opposite Sneedhams Road. Currently used for grazing and keeping horses. This site provides an opportunity to link with the wider JCS strategic allocation at Winneycroft and deliver a small number of new homes.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• The site lies in a medium Landscape Sensitivity Area. The layout, form, scale and architectural appearance should complement the setting of the site and not impact on the views into or from the Cotswold AONB and Robinswood Hill.</li> <li>• Properties should be laid out to create an active frontage to Winneycroft Lane.</li> <li>• The site should be designed to create a suitable transition between any built up area to the north and the rural fringe of the city.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological assessment.</li> <li>• Site is relatively close to the protected moated site to the south.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Maintain and enhance hedgerows and trees.</li> <li>• A remnant orchard is located to the north east of adjacent land and on the opposite side of the M5, plus fruit and nut trees on site. Implement opportunities for linear orchard planting in hedgerows, in consultation with the City Council.</li> <li>• Bat surveys: Building inspections (and any required emergence/re-entry surveys) if any buildings are scheduled to be removed or altered and bat activity surveys.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul>	

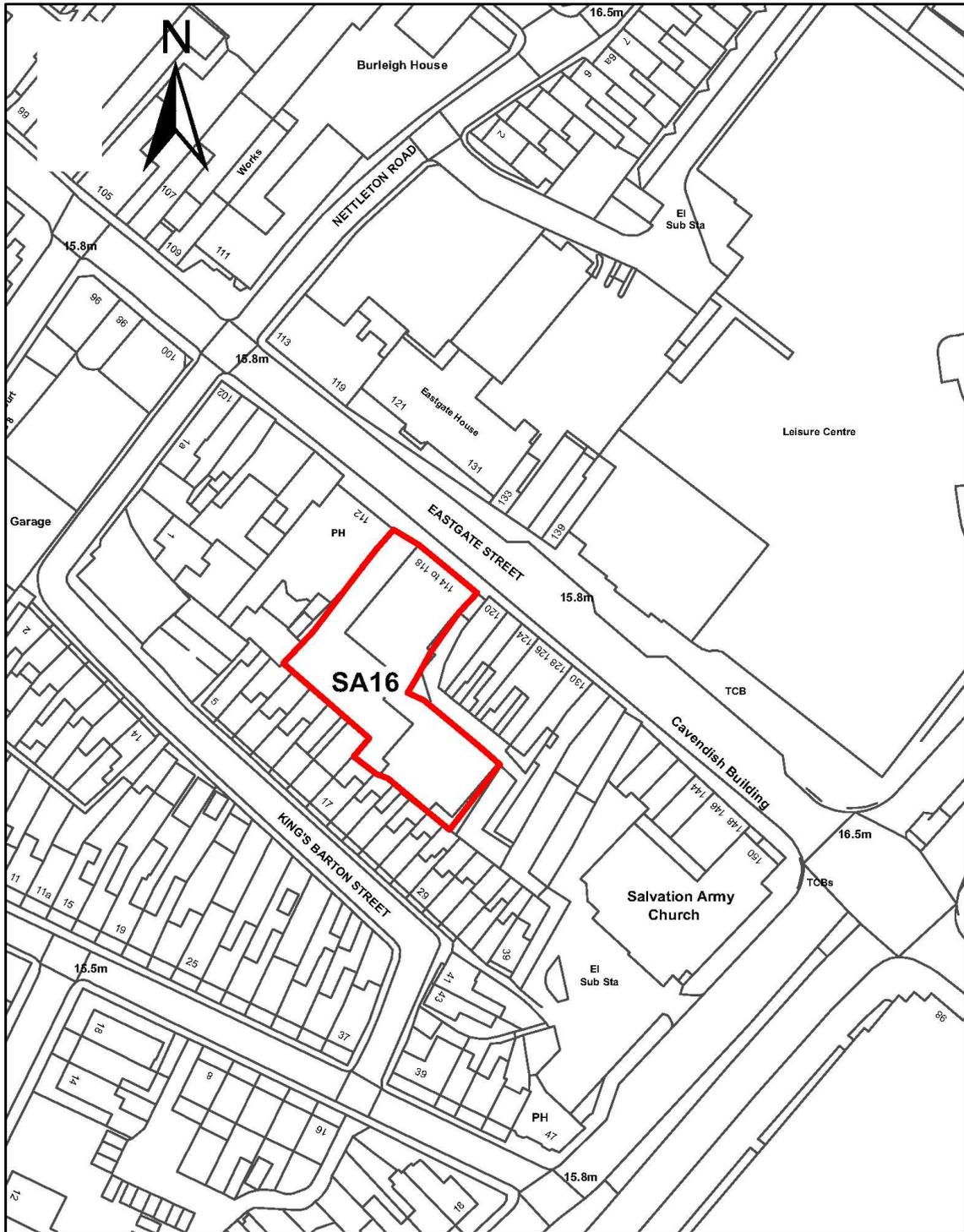


### Land South of Winnycroft Allocation

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## Policy SA16: Land off Lower Eastgate Street

Ward / Postcode / GeoRef	Westgate / GL1 1QT / E: 383542 N: 218189
Gross Site Area:	0.13 ha.
Allocation:	Approximately 15 residential dwellings.
<p><b>Description and overview</b>  Urban infill site on lower Eastgate street. The area is a busy city centre location with a relatively large number of commercial uses in proximity. The site offers the opportunity for a small higher density development of residential dwellings, within the city centre boundary and near the transport hub.</p> <p><b>Site specific requirements and opportunities</b></p> <p><u>Design and layout</u></p> <ul style="list-style-type: none"> <li>• Enhance the streetscene to Eastgate Street with the opportunity to increase the height of the built form whilst complimenting the existing parade of shops.</li> <li>• Any development to the rear will have to be considerate of the relationship to the residential properties along Kings Barton Street. These properties have limited rear gardens and are at risk of being overlooked or overshadowed.</li> <li>• The scale of any development at the rear must not be overbearing to the existing residential properties.</li> <li>• Consideration needs to be given to the neighbouring uses surrounding the site. These include pubs, nightclubs and fastfood outlets. Careful design and mitigation will be required to ensure any proposed development is compatible with existing uses.</li> </ul> <p><u>Historic environment</u></p> <ul style="list-style-type: none"> <li>• Site is within the Eastgate &amp; St Michaels Conservation Area. new development must therefore positively respond to the London Road Conservation Area Appraisal and Management document.</li> <li>• Various listed buildings in proximity and development must respect the buildings and setting.</li> <li>• Desk-based evaluation and possibly a trial trench; Route of the Roman road known as the 'Portway' extends through the northern part of the site and there is evidence of archaeological remains. It is possible that settlement and burial activity of Roman date extends through the site.</li> </ul> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised on this site.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><u>Flood risk</u></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> </ul>	



**Land off Lower Eastgate Street**

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## Policy SA17: Land South of Triangle Park (Southern Railway Triangle)

Ward / Postcode / GeoRef	Elmbridge / GL4 3JS (nearest) / E: 384603 N: 217834
Gross Site Area:	4.2 ha
Allocation:	B1 / B8 Class Employment use
<b><u>Description and overview</u></b>	
This site is currently used by Network Rail for operational purposes. However, this will cease during the plan period. The site provides an opportunity for an extension to the successful 'Triangle Park' to the north and is therefore allocated for B use employment.	
<b><u>Site specific requirements and opportunities</u></b>	
<b><u>Design and layout</u></b>	
<ul style="list-style-type: none"> <li>• Consideration to be given to the views of the site from the Metz Way and the railway line approaches.</li> <li>• Design should be of a high quality that is locally distinctive and positive given this site forms an entrance point into the city particularly for rail users</li> <li>• Create appropriate planting buffers to help mitigate any noise, vibration and air pollution from the railway line and integrate with the wider GI network.</li> </ul>	
<b><u>Highways and access</u></b>	
<ul style="list-style-type: none"> <li>• Access via existing route of Metz Way, with link into site via Metz Way bridge.</li> </ul>	
<b><u>Historic environment</u></b>	
<ul style="list-style-type: none"> <li>• Archaeological Assessment given previous use of the site.</li> </ul>	
<b><u>Biodiversity</u></b>	
<ul style="list-style-type: none"> <li>• Green infrastructure contributions between Ayland Gardens and Overbury Road (the closest opportunity to the site). Further consider Green Infrastructure connectivity to Former Great Western Road Sidings (Site Allocation SA5).</li> <li>• Creation and retention of suitable habitat for invertebrates and reptiles and other brownfield site species.</li> <li>• Green roofs and walls should also be utilised on site.</li> <li>• Bat survey: Building inspections (and any required emergence/re-entry surveys) if any buildings are scheduled to be removed or altered and bat activity surveys.</li> <li>• Badger survey: To assess presence.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul>	

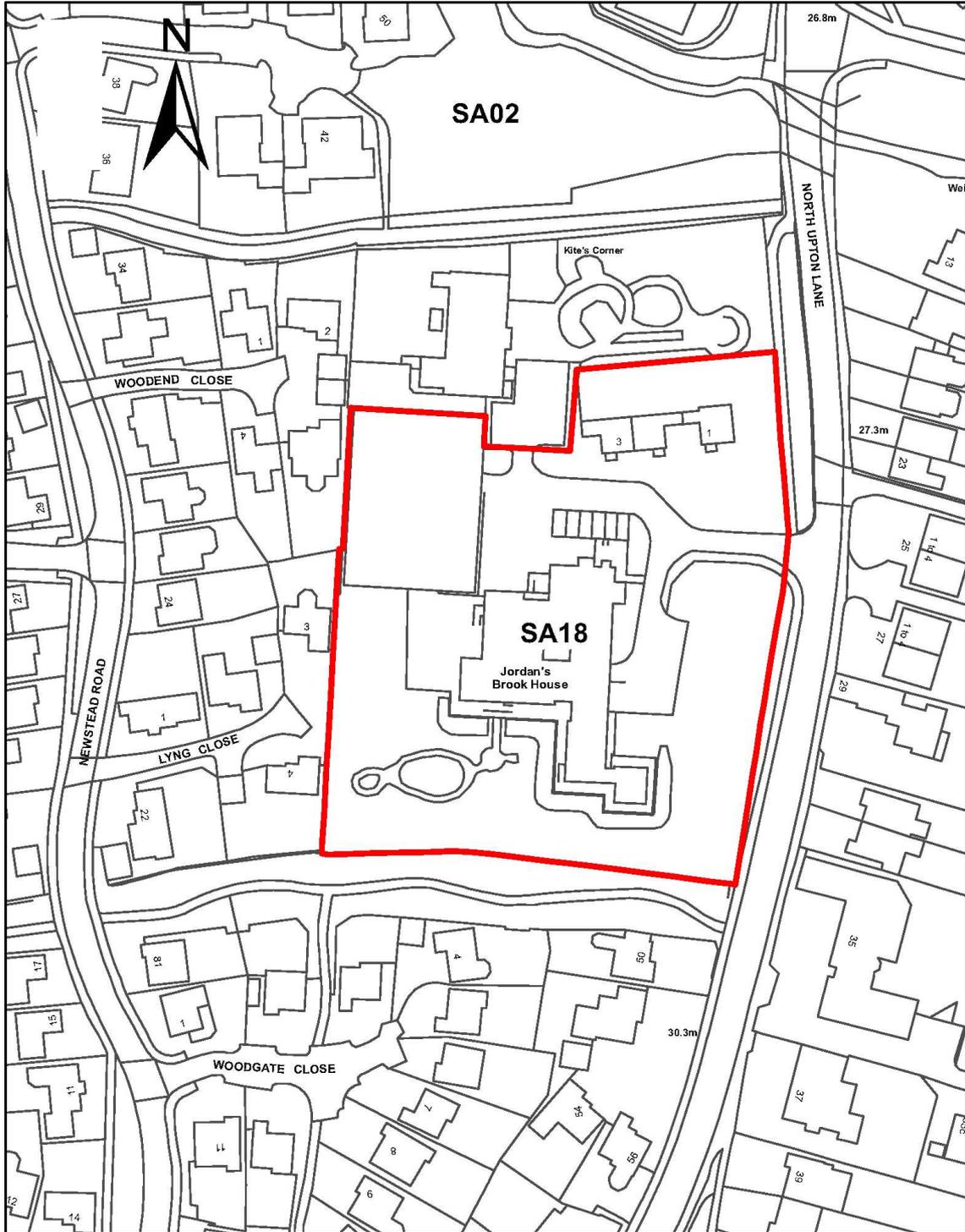


### Land South of Triangle Park (Southern Railway Triangle)

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## Policy SA18: Jordan's Brook House

Ward / Postcode / GeoRef	Barnwood / GL4 3TL / E: 386354 N: 217605
Gross Site Area:	0.85 ha.
Allocation:	Residential: Approximately 20 dwellings.
<p><b><u>Description and overview</u></b></p> <p>The site is in an attractive location off North Upton Lane and contains existing Council buildings (C2 residential) as well as car parking and gardens. There are a good number of large trees on the periphery. The site offers the opportunity for redevelopment to deliver a small number of new homes.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Provide overlooking to the public footpath to the south of the site.</li> <li>• Preserve the mature character of North Upton Lane through the retention of the existing mature trees building line.</li> <li>• Site will need to be sensitively developed to reduce impacts to the existing occupiers to the west and south of the site. Development should not encroach on these boundaries or create any overlooking or loss of privacy.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological desk-based assessment, possible archaeological evaluation via trial trenching.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Improve Green Infrastructure links via a corridor to Land at Barnwood Manor (Site Allocation SA02) and Barnwood Arboretum / Park and Local Wildlife Site.</li> <li>• Retention of naturalised watercourse.</li> <li>• Lighting scheme that retains darkness to protect local otter population using Wotton Brook.</li> <li>• Minimum 10m green buffer strip between any development and the watercourse.</li> <li>• Swift blocks, bat boxes and provision for house martins.</li> <li>• Maintain good tree connectivity.</li> <li>• Bats survey: Building inspections (and any required emergence/re-entry surveys) and activity survey.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Otter and water voles survey: Survey of watercourse for recent evidence of presence.</li> </ul>	

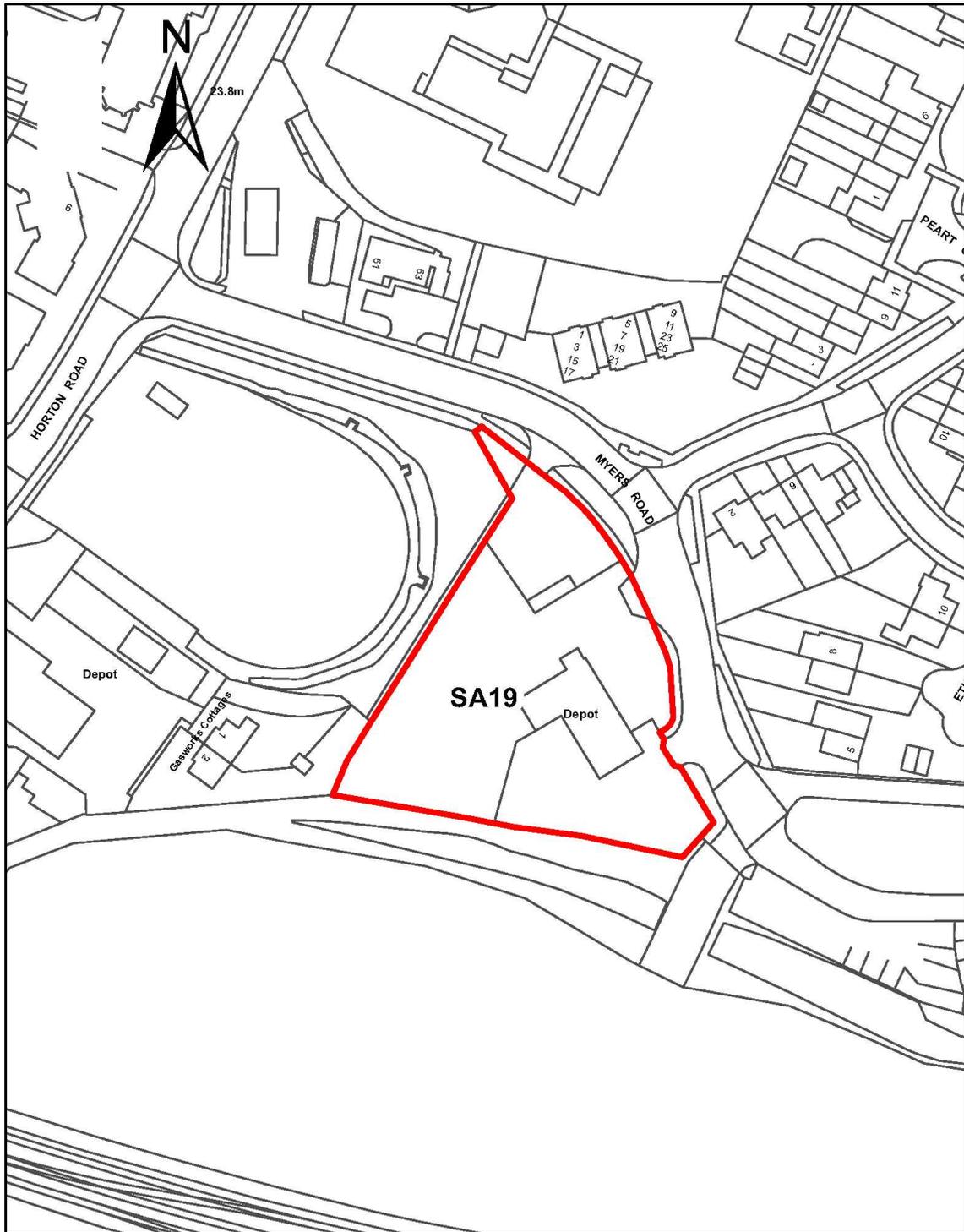


## Jordan's Brook House

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## Policy SA19: Land off Myers Road

Ward / Postcode / GeoRef	Elmbridge / 3L1 3QD / E: 384437 N: 218299
Gross Site Area:	0.36 ha.
Allocation:	Approximately 10 residential dwellings
<p><b><u>Description and overview</u></b></p> <p>A small brownfield site located off Myers Road, backing onto former gas holder land. The suitability of this site is dependent on the removal of the adjacent Allstones Sand and Gravel site, which has planning permission for residential development and student accommodation.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Enhance the streetscene and create an active building frontage and overlooking to Myers Road.</li> <li>• Provide more green infrastructure and create a more pleasant environment.</li> <li>• Layout to not preclude the adjacent sites coming forward for development.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological investigation via trial trenching; the site is near the recorded locations of two Roman period lead coffins, therefore an historic cemetery could extent into the area.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Improve tree or hedge planting on the adjacent dismantled gas holder site.</li> <li>• Green infrastructure improvements linking to those undertaken and required for Great Western Road sidings (Site Allocation SA05).</li> </ul> <p><b><u>Air Quality</u></b></p> <ul style="list-style-type: none"> <li>• Given the proximity of potentially polluting land uses and the railway line development should demonstrate compliance in meeting EU limit values and national objectives for air pollutants. The development must be consistent with the Local Air Quality Action Plan.</li> </ul>	

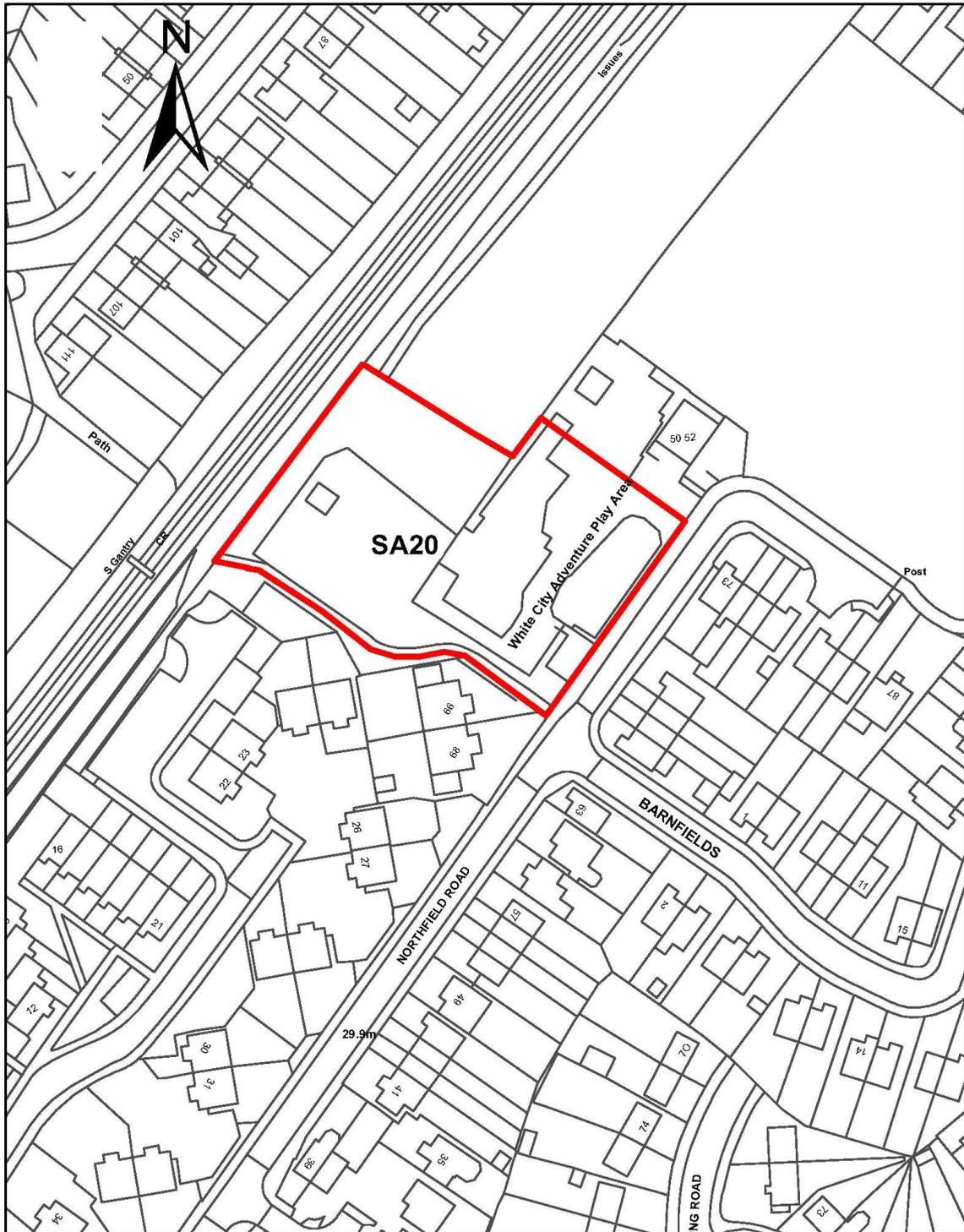


## Land off Myers Road

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## Policy SA20: White City Replacement Community Facility

Ward / Postcode / GeoRef	Matson & Robinswood / GL4 6UW / E: 383749 N: 216444
Gross Site Area:	0.42 ha.
Allocation:	Community facility
<p><b><u>Description and overview</u></b></p> <p>There is an identified need for new community facility in the White City area of the city, to replace that lost at the former St Aldates site. The Gloucester Built Sports Facility Strategy further identifies the capacity for a small sports hall in this area. A new community facility on this site must deliver for the needs of the local community and complement the multi-use health and wellbeing facility proposed at Blackbridge Sports and Community Hub (Site Allocation SA06).</p> <p>Part of the site is a playground with various apparatus and amenity grassland. The other half of the site is amenity grassland with a cultivated patch used by the neighbouring allotments. It is bordered to the west by a railway line, and allotments and green space to the north. To the south and east of the site are residential areas.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• Careful consideration should be given to the impact to the adjacent bungalows. Development should be set away and set down from these properties.</li> <li>• Any proposed building will need to respond to the residential setting and character of the area and be domestic in scale.</li> <li>• The properties opposite the site have limited front gardens and windows overlooking the site. Consideration should be given to the location of the site access, hours of operation, and scale of development to ensure that existing residents are not unduly impacted by any intensification of use at the site or additional vehicular movements.</li> </ul> <p><b><u>Open space</u></b></p> <ul style="list-style-type: none"> <li>• Facilitate better use existing open space (Open Space Strategy reference MR13: White City Open Space, Northfield Road).</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Retention of some brownfield land adjacent to the railway, and/or basic enhancements such as trees, hedges and planting for pollinators.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: Not required, but vegetation should be removed during the active season in a phased manner.</li> </ul>	

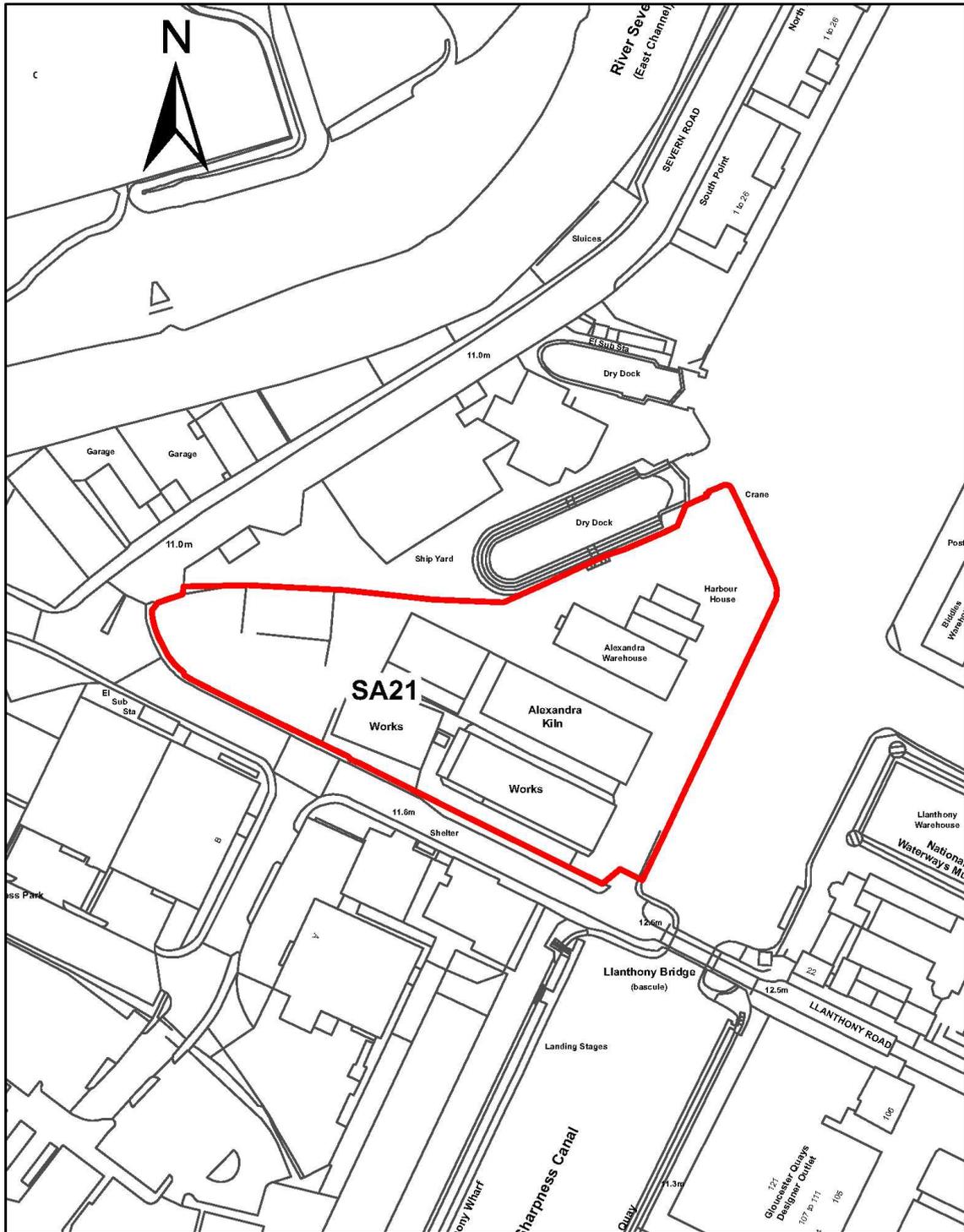


## White City Replacement Community Facility

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## Policy SA21: Part of West Quay, the Docks

Ward / Postcode / GeoRef	Westgate / GL2 5HQ / E: 382574 N: 218207
Gross Site Area:	0.7 ha.
Allocation:	Main town centre uses, including approximately 20 dwellings. Please note, the allocation does not include Alexander Warehouse.
<b><u>Description and overview</u></b>	
An attractive dockside site adjacent to Gloucester's historic dry docks. The site is currently utilised by a range of different uses including Gloucester Brewery and the Furniture Recycling Project. The site offers the opportunity for a redevelopment to better reflect the character of the wider area, including the Listed Alexandra Warehouse and setting, and its location with the Docks Conservation Area.	
<b><u>Site specific requirements and opportunities</u></b>	
<b><u>Design and layout</u></b>	
<ul style="list-style-type: none"> <li>• Protect the amenity and business activities of the T. Neilson &amp; Company who operate the Dry Dock.</li> <li>• Opportunity to provide additional overlooking to Llanthony Road.</li> <li>• Public realm will need to be addressed to bring together a cohesive overall appearance that relates to the wider Docks area.</li> </ul>	
<b><u>Historic environment</u></b>	
<ul style="list-style-type: none"> <li>• Site located within The Docks Conservation Area; new development must therefore positively respond to The Docks Conservation Area Appraisal and Management document.</li> <li>• Respect and enhance the setting of the Listed Alexandra Warehouse.</li> <li>• Archaeological desk-based assessment and further evaluation.</li> </ul>	
<b><u>Biodiversity</u></b>	
<ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised on this site.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> <li>• Bat survey: Building inspections (and any required emergence/re-entry surveys).</li> <li>• Birds: None, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> </ul>	
<b><u>Flood risk and water</u></b>	
<ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (July 2019).</li> <li>• Consideration to be given to the protection of water quality during construction and operation.</li> </ul>	

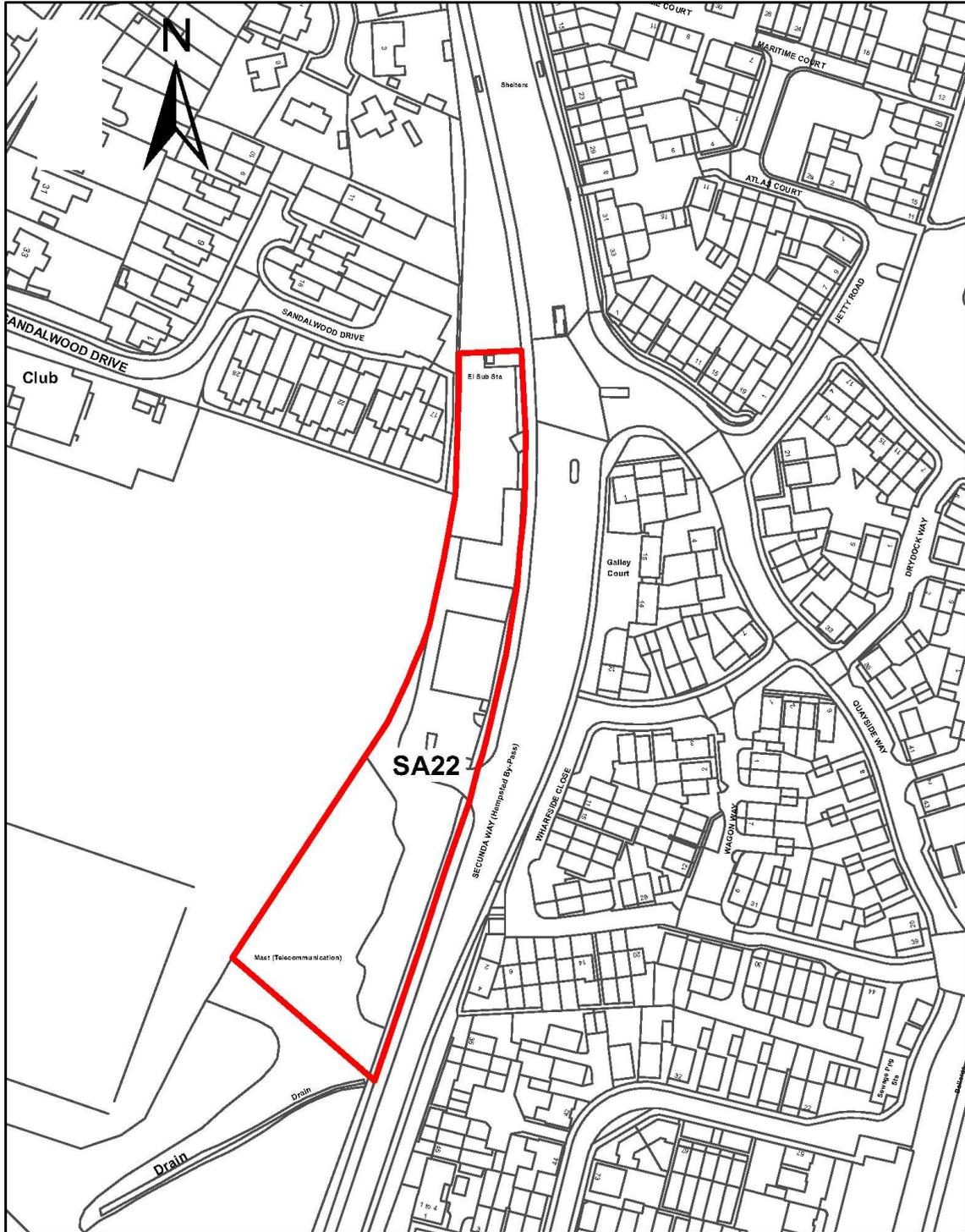


## Part of West Quay, The Docks

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## Policy SA22: Land adjacent to Secunda Way Industrial Estate

Ward / Postcode / GeoRef	Westgate / GL2 5GA / E: 382065 N: 217271
Gross Site Area:	0.7 ha.
Allocation:	B Class Employment Use
<p><b><u>Description and overview</u></b></p> <p>Small linear site to the west of A430 Secunda way with buildings previously in employment use on the northern section. Recently cleared scrubby land on the southern section. The site offers the opportunity for a small addition to the city's employment land.</p>	
<p><b><u>Site specific requirements and opportunities</u></b></p> <p><b><u>Design and layout</u></b></p> <ul style="list-style-type: none"> <li>• The site should be laid out as to avoid causing adverse impacts to residents of Sandalwood Drive.</li> <li>• Development should be set back from the road to allow for a suitable buffer and adequate landscaping.</li> <li>• Where appropriate a pedestrian route should be established to allow employees to access the playing fields at the rear of the site.</li> </ul> <p><b><u>Historic environment</u></b></p> <ul style="list-style-type: none"> <li>• Archaeological investigation.</li> </ul> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• Bat survey: If buildings are to be removed or altered.</li> <li>• Reptiles: A reptile method statement will be required during construction or a reptile survey if habitat is left to develop naturally.</li> </ul>	



## Land adjacent to Secunda Way Industrial Estate

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## 5. MONITORING FRAMEWORK

5.1 To be completed.

## 6. STRATEGIC POLICIES AND PROPOSALS IN THE JOINT CORE STRATEGY AND GLOUCESTER CITY PLAN

- 6.1 For Gloucester the majority of strategic policies are contained within the JCS. A full list of strategic and non-strategic policies contained within the development plan as a whole are as follows:

### Joint Core Strategy 2011-2031 – Strategic Policies

Paragraph 2.2 - Vision
Paragraph 2.35 – Strategic Objectives 1 to 9
Policy SP1 – The Need for New Development
Policy SP2 - Distribution of New Development
Policy SD1 - Employment
Policy SD2 - Retail and City / Town Centres
Policy SD3 - Sustainable Design and Construction
Policy SD4 – Design
Policy SD5 – Green Belt
Policy SD6 - Landscape
Policy SD7 - AONB
Policy SD8 Historic Environment
Policy SD9 – Biodiversity and Geodiversity
Policy SD10 – Residential Development
Policy SD11 - Housing Mix and Standards
Policy SD12 – Affordable Housing
Policy SD13: GTTS
Policy SD14 – Health and Environmental Quality
Policy SA1 - Strategic Allocations
Policy INF1 – Transport Network
Policy INF2 - Flood Risk Management
Policy INF3 – Green Infrastructure
Policy INF4 - Social and Community Infrastructure
Policy INF5 – Renewable Energy and Low Carbon Energy Development
Policy INF6 – Infrastructure Delivery
Policy INF7 – Developer contributions
Policy SA1 - Strategic Allocations

### Gloucester City Plan 2011-2031 – Strategic Policies

Vision
Key Principles
Policy A2: Affordable Housing Policy
Policy A6: Accessible and adaptable homes
B2: Safeguarding employment sites

Policy B3: New employment development and intensification and improvements to existing employment land
Policy C6: Cordon sanitaire
Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation
Policy F6: Nationally Described Space Standards
Policy G8: Review mechanism
Site Allocations SA01 to SA22
Policy SA01: Land at the Wheatridge
Policy SA02: Land at Barnwood Manor
Policy SA03: Former Prospect House, 67-69 London Road
Policy SA04: Former Wessex House, Great Western Road
Policy SA05: Land at Great Western Road Sidings
Policy SA06: Blackbridge Sports and Community Hub
Policy SA07: Lynton Fields, Land East of Waterwells Business Park
Policy SA08: King's Quarter
Policy SA09: Former Quayside House, Blackfriars
Policy SA10: Former Fleece Hotel & Longsmith Street Car Park
Policy SA11: Land rear of St Oswalds Retail Park
Policy SA12: Land at Rea Lane, Hempsted
Policy SA13: Former Colwell Youth & Community Centre
Policy SA14: Land off New Dawn View
Policy SA15: Land South West of Winneycroft Allocation
Policy SA16: Land off Lower Eastgate Street
Policy SA17: Land South of Triangle Park (Southern Railway Triangle)
Policy SA18: Jordan's Brook House
Policy SA19: Land off Myers Road
Policy SA20: White City Replacement Community Facility
Policy SA21: Part of West Quay, the Docks
Policy SA22: Land adjacent to Secunda Way Industrial Estate

#### **Gloucester City Plan (2011-31) – Non-Strategic Policies**

Policy A1: Effective use of land and buildings
Policy A3: Estate regeneration
Policy A4: Student accommodation
Policy A5: Specialist housing - Housing choice for older, frail and disabled people
Policy A7: Self build and custom build homes
Policy A8: Static caravan sites
Policy A9: Extensions to existing dwellings
Policy A10: Annexes to existing dwellings
Policy B1: Employment and skills plans
Policy B4: Development within and adjacent to Gloucester Docks and Canal
Policy B5: Tourism and culture
Policy B6: Protection of public houses
Policy C1: Active design and accessibility
Policy C2: Allotments
Policy C3: Open space, playing fields and sports facilities
Policy C4: Hot food takeaways
Policy C5: Air quality
Policy C7: Fall prevention from taller buildings

Policy C8: Changing Places Toilets
Policy D1: Historic environment
Policy D2: Non-designated heritage assets
Policy D3: Recording and advancing understanding of heritage assets
Policy D4: Shopfronts, shutters and signs
Policy D5: Views of the Cathedral and historic places of worship
Policy E1: Landscape character and sensitivity
Policy E2: Biodiversity and geodiversity
Policy E3: Nature Recovery Area
Policy E4: Trees, woodlands and hedgerows
Policy E5: Green Infrastructure: Building with Nature
Policy E6: Flooding, sustainable drainage, and wastewater
Policy E7: Renewable energy potential of the River Severn and the canal
Policy F1: Materials and finishes
Policy F2: Landscape and planting
Policy F3: Community safety
Policy F4: Gulls
Policy F5: Open plan estates
Policy G1: Sustainable transport
Policy G2: Charging infrastructure for electric vehicles
Policy G3: Cycling
Policy G4: Walking
Policy G5: Broadband connectivity
Policy G6: Telecommunications infrastructure
Policy G7: Water Efficiency

#### Article 4 Directions

- 6.2 Gloucester currently has two Article 4 directions, at St Michael's Square and Southgate Street Conservation Area. Full details can be found online <https://www.gloucester.gov.uk/planning-development/conservation-regeneration/article-4-direction/>

## 7. SUPERSEDED POLICIES

7.1 The following policies from the Adopted Gloucester City Local Plan (1983) are superseded by the Gloucester City Plan.

E1	Release of industrial land sufficient for 5 years requirement
E2	Release of office development sufficient to cater for 5 years requirement
H1	Release of land for residential development to cater for 5 years requirement
H1c	Provision of additional housing sites to those identified in H1a will be encouraged in the city centre
H1e	Density and quality of housing development
H3	Preservation and revitalization of older housing stock
H4b	Provision of grants for adaptation of homes for the registered disabled
A1a	Heights of buildings and protection of views
A2	Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas
A2d	Demolition of listed buildings in conservation areas
A3g	Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street
A4e	Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances
A5a	The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged
A5c	Conservation and maintenance of structures and settings of City's historic fabric (various sites)
A5d	Redevelopment of Blackfriars as a tourist attraction
A6a	Provision of coach parking facilitate at Westgate Street and the Docks

A7	Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand
A7a	Provision of appropriate self-catering accommodation. Conference Centre and central area hotels
A7b	Encourage Guest House developments along main radial routes and the city centre
T1e	Pedestrian priority within traffic management schemes in the main shopping area of the city.
T1f	Pedestrian priority in the city centre outside the main shopping area
T2d	Measures to facilitate rear access servicing
T3	Introduction of traffic regulation and control measures along Bristol Road and Southgate Street
T3a	Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures
T3b	Consideration will be given to traffic management along Bristol Road
T4a	Differential charging of short and long stay car parks to discourage inappropriate use
T4k	Provision of car parking at private development in accordance with the Councils car parking standards
S1e	Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area
S2b	Major convenience shopping will not usually be permitted outside the main shopping area
S3	Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged
S3a	Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas
S3b	The City Council will seek to maintain the existing neighbourhood shopping provision in the City
L1	Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.

L1a	Retain existing areas of public open space
L1c	In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.
L1d	Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.
L2d	Seek to provide additional sports facilities on public open space in new developments.
L3c	Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester
L3d	Maintenance and protection of Robinswood Hill Country Park

## 8. 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.

**Article 4 Direction** - An article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

**Biodiversity** - 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'.

**Built Sports Facility** – Buildings used for playing sport and undertaking physical activity, including sports halls, swimming pools, squash courts, athletics tracks, climbing walls, gymnastics centres and indoor bowls.

**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.

**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.

**Designated heritage asset** - A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

**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.

**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).

**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.

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

**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.

**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 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).

**Major development** – Developments of 10 or more residential dwellings or a gross site area of 0.5 hectares or more.

**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.

**Nature Recovery 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.

**National Planning Practice Guidance** – The Government’s guidance in support of the National Planning Policy Framework.

**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 (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).

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

**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.

**Playing 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.

**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 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).

**Significance (heritage)** - The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

**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.

**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.

# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>11 September 2019</b>
<b>Subject:</b>	<b>Community Safety Update Report</b>		
<b>Report Of:</b>	<b>Cabinet Member for Communities and Neighbourhoods</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Emily Bolland – Community Wellbeing</b> <a href="mailto:emily.bolland@gloucester.gov.uk">emily.bolland@gloucester.gov.uk</a>		
		<b>Tel:</b>	<b>396268</b>
<b>Appendices:</b>	1. Stronger Safer Gloucester Partnership Annual Review 2. Stronger Safer Gloucester Partnership priorities 2019/20		

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 To update Cabinet on the Stronger Safer Gloucester Partnership's most recent community safety work.

### 2.0 Recommendations

- 2.1 Cabinet is asked to **RESOLVE** that the community safety work of the Stronger Safer Gloucester Partnership be noted.

### 3.0 Background and Key Issues

- 3.1 Gloucester City Council hold responsibility for delivering community safety work across the City. Community safety is a statutory obligation for local authorities; the Crime and Disorder Act 1998 as amended by the Police Reform Act 2002 requires local authorities and the Police to work in partnership to reduce crime and disorder in their areas.
- 3.2 The Stronger Safer Gloucester Partnership (SSGP) is Gloucester's community safety partnership. Previously known as Safer Gloucester, the partnership was reviewed and rebranded in late 2017 during which it broadened its focus to incorporate health and wellbeing in recognition that crime, health, wellbeing and levels of deprivation can be intrinsically linked and should be looked at together in order to successfully address the root causes of crime and anti-social behaviour.
- 3.3 The review of the Safer Gloucester Partnership was conducted with stakeholders in September 2016 to take stock of the work that the partnership was doing, look at how we worked and where we could work better. This work coincided with the countywide review which led to the establishment of Safer Gloucestershire. The

Gloucester review was completed between August and October 2017 through interviews with key partner agencies and stakeholders who had been part of the Safer Gloucester Leadership Group.

- 3.4 The Stronger Safer Gloucester Partnership held its first meeting in November 2017 with attendance from key partner agencies and has maintained increased engagement from partners since with 15 regularly attending, almost doubling previous attendance. A list of key partners can be found in Appendix 1.
- 3.5 The SSGP has evolved to become more outcome-focussed, with clear objectives agreed upon by all partners who all commit to being part of the delivery. The role of the SSGP is seen as one of influencing and conveying the benefits of partnership working, continually looking to enhance the partnership work across the City. Focussing on what we can only do together, looking to co-commission, being mindful of practitioner and community input alongside data to understand our communities better, and incorporating ABCD in our joint way of working we have seen some positive and progressive work taking place within our City.
- 3.6 The SSGP has several offshoot partnerships including DaySafe and NightSafe, and sets up Task & Finish Groups for relevant issues. In addition, it links in to and is mindful of the aims and objectives of other partnerships including Safer Gloucestershire, the Health and Wellbeing Board, Integrated Locality Partnerships, the Prevention and Self Care Board, Safeguarding boards, Gloucester BID, the Early Help Partnership, various culture boards and place-based groups.
- 3.7 The Stronger Safer Gloucester Partnership focusses on key priorities each year which are categorised in to three subjects: Prevention, Protection and Response. The priorities are agreed in partnership, have input from all and are backed up with local knowledge and data around the subject matter so that we can ensure we are addressing issues which are relevant to our communities.
- 3.8 For 2018/19, the SSGP focussed on the priorities described in appendix 1. The work around these agreed priorities is undertaken in addition to “business as usual” work by individual partner organisations.
- 3.9 Community safety incorporates many strands. Day to day work for the Council and SSGP partners over the past year has included:
  - General crime and anti-social behaviour (including Solace ASB casework)
  - Domestic abuse and sexual violence (DASV)
  - Modern day slavery
  - Drug related issues including dangerous drug networks, county lines and exploitation
  - Alcohol related issues including street drinking, licensing and the Bluelight project
  - Violence issues including knife crime and prevention work
  - Night-time economy specific issues such as alcohol related disorder and personal safety
  - Daytime economy specific issues such as shoplifting, drug dealing and begging
  - Homelessness/rough sleeping and associated vulnerabilities which can lead to victims/perpetrators of crime

- The safety of public spaces, incorporating Public Spaces Protection Orders and prevention workstreams such as Street Aware
- CCTV across the City
- Domestic Homicide Reviews
- Safeguarding, and the recognition that places as well as people can be safeguarding concerns
- Adverse Childhood Experiences
- Strengths based problem solving around any crime or ASB issues which may be affecting the community
- Focussing on building community strength and resilience
- Supporting victims, communities and perpetrators, all of whom may be leading chaotic lives and have complex needs
- Bringing together enforcement and support agencies to encourage greater partnership working and understanding of each other's roles
- Exploring co-commissioning with partner agencies

3.11 The safety of our public spaces has been a key piece of work over the last two years, with Public Spaces Protection Orders introduced across the City in November 2018. A full report on this came to Council in 2018 following widespread consultation, and a review report will be submitted within the next 12 months.

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

4.1 We have consciously woven ABCD and strengths-based problem solving in to our community safety approaches in order to support residents to feel better connected to their neighbours and neighbourhoods. It is recognised in ABCD research that when residents know the names of their neighbours they feel safer in their area, and that when residents do things together the area becomes safer.

#### **5.0 Environmental Implications**

5.1 Creating safer and stronger communities across our City is a key aim for Gloucester City Council. Key to this is working in partnership and by building and continuing to create strong relationships with partner agencies including statutory organisations, communities and the Voluntary and Community Sector, we are able to work together to build stronger relationships with and amongst our communities. The environmental implications of this are that areas feel safer and residents feel happier where they live.

#### **6.0 Alternative Options Considered**

6.1 The City Council realised that it was important to review our community safety partnership and our approach in order to work more systemically and be able to link key themes together to achieve sustainable change within our communities. As a result, we have seen further increased joint working and more positive outcomes, especially in groups with vulnerabilities and complex needs.

6.2 The Council could have remained working as Safer Gloucester rather than review the scope of our work, however since establishing the Stronger Safer Gloucester Partnership we have seen a reduction in duplication of work, increase in partnership working on various subjects and a greater understanding amongst partner agencies (for example from support and enforcement backgrounds) of the work that each

other does and how we can support and compliment joint aims to co-ordinate our work better and achieve better outcomes for residents.

## **7.0 Reasons for Recommendations**

7.1 No recommendations are made in this report, it is for information only.

## **8.0 Future Work and Conclusions**

8.1 In addition to day to day work and following on from the 2018/19 work of the Stronger Safer Gloucester Partnership, the SSGP has recently reviewed its objectives for 2019/20. Priorities are agreed in partnership and link in to the aims of the Police and Crime Commissioner as well as the other partnership boards mentioned earlier in this report. The SSGP's aims for 2019/20 continue to include those from last year and additionally focus on:

### **8.1.1 Prevention**

- **Vulnerable Women's Project**

Continue to co-commission bespoke and holistic support to a cohort of up to 16 vulnerable women to improve their lives and reduce engagement with statutory services.

- **Health**

Support the work of partners in public health and Integrated Locality Partnerships by exploring co-production with the aim of reducing health inequalities in the City. Particular focus on mental health, obesity and physical activity

### **8.1.2 Protection**

- **Intensive Engagement in Widden**

Piloting the intensive engagement method in Widden. Area chosen because of issues with crime and anti-social behaviour, street drinking and sex work.

- **Knife Crime**

To monitor, understand and respond to local trends. To ensure communication is balanced and thoughtful and provide public reassurance. Partners to update on work being undertaken to impact on knife crime, particularly focussing on the root causes of knife crime and the support available to prevent escalation

### **8.1.3 Response**

- **Street Aware**

Continue to increase the safety and attractiveness of Gloucester City Centre particularly in relation to ASB. Strands for Begging, Street Drinking and Youth ASB. Work effectively with partners in City Centre, focus throughout 2019 on youth ASB

- **Gloucester Park**

Work in partnership to increase the safety and attractiveness of Gloucester Park, increasing positive uses of the park to overcome negative ones

8.2 The SSGP's priorities dashboard for 2019/20 is included as Appendix 2.

## **9.0 Financial Implications**

9.1 There are no financial implications as a result of this report as it is an update report covering activities funded through the budget and remit of the Council or via shared resources as agreed through the Stronger Safer Gloucester Partnership. (Financial Services have been consulted in the preparation this report.)

## **10.0 Legal Implications**

10.1 Community safety work is a statutory duty, local authorities have a responsibility to work with local police to address crime and disorder in their areas. The work of the Stronger Safer Partnership and the Council fulfils this duty.  
(One Legal have been consulted in the preparation this report.)

## **11.0 Risk & Opportunity Management Implications**

11.1 There are no risks associated with this update report.

11.2 The City Council and the Stronger Safer Gloucester Partnership take or create opportunities where possible to increase public reassurance, encourage responsible reporting of issues and implement prevention strands or proactive work in response to trends in order to increase resident's safety and feelings of safety.

## **12.0 People Impact Assessment (PIA) and Safeguarding:**

12.1 An Equality Impact Assessment is not relevant for this report as it is giving an overview of work undertaken rather than proposing service changes.

12.2 Considerations are given when undertaking all community safety work to ensure that we do not adversely impact on any group and that we are fostering good relations and promoting advancement of opportunities within the community.

## **13.0 Community Safety Implications**

13.1 The contents of this report all work towards increasing community safety across Gloucester.

13.2 Our community safety work has evolved to include ABCD and strengths-based problem solving. From a community safety point of view, we have found that working with residents, including alleged perpetrators, has led to more creative problem solving and solutions that are more sustainable because they are led by the individual or community rather than the agency.

## **14.0 Staffing & Trade Union Implications**

14.1 None

**Background Documents:** None

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## Stronger Safer Gloucester Partnership

### Annual Review 2018

The Stronger Safer Gloucester Partnership first met in November 2017. Previously known as the Safer Gloucester partnership, as a community safety partnership it was reviewed in autumn 2017 and broadened to include a health and wellbeing focus and with the intention of working more systemically with partners.

The Stronger Safer Gloucester Partnership (SSGP) is now the strategic group responsible for the wider wellbeing, health and community safety agenda in the City of Gloucester. Focusing on co-production and building on the strong relationships that exist between partner agencies in our City, bringing together the people who have the ability, resources and commitment to make things happen.

The SSGP is supportive and professionally challenging in our work in order to link the engagement, prevention and enforcement agendas. We work collectively and use positive and strengths-based problem-solving methodologies to shape our shared response to local trends.

The partnership works to three themed areas – Prevention, Protection and Response. This is in line with the review of the partnership and based on feedback from partners in order to keep our work focused on outcomes for the communities of Gloucester.

During 2018, our shared partnership work focused on the below:

#### Prevention

##### **Bluelight Project**

The Bluelight Project is a pilot set up by Public Health with funding from Alcohol Concern to work with hard to engage, change resistant drinkers in Gloucester City who are impacting heavily on their own health, the community or bluelight services as a result of their alcohol consumption. Delivery is provided by CGL who offer an enhanced service to people who meet the Bluelight criteria, this includes assertive engagement and outreach and holistic problem solving.

The group began in May 2018 with just two referrals in the first months. Promotion through the partnership and partner agencies has seen this grow to 27 referrals to the group so far. Some have not been taken on for various reasons including the referred person already engaging with standard services or living outside of the pilot area. However, due to crossover identified in people moving between Gloucester and Cheltenham, the group is expanding in 2019 to include Cheltenham too.

The group has partners from health, supported housing, emergency services, councils and support agencies engaged and actively referring. One of the most significant case studies is a woman who had been heavily drinking for years and has experienced complex issues including childhood trauma, exploitation, eating disorders and acute health needs and has frequently failed to engage with support. Since July 2018 she has worked with partners who were able to put in place local support to start addressing some of the root causes of her drinking, before a rehab placement was secured for her. She has been actively engaging now for 10 months and has become a peer mentor at her rehab placement, with robust transition plans in place for when she leaves.

- Approx. 70-80 Gloucester-based front-line staff attended 5 training sessions in Oct 2017-Feb 2018
- 27 referrals to Bluelight group since June 2018
- Actively working with cohort of 16
- 19 partner agencies involved/referring
- Expanding to include Cheltenham referrals in Summer 2019

### **Vulnerable Women Project (Holistic support)**

The Vulnerable Women Project aims to work with women with complex needs who engage continually with a range of services. The aim is to have a key worker to support each woman to address their short and long term needs in order to live safer and healthier lives without the long term need for agency involvement.

The project will measure success based on results for each individual. In addition, learning from the project will help to evaluate current practise and inform person centred commissioning in future. The project has been commissioned from spring 2019 and will be established over the next year.

### **Domestic Abuse & Sexual Violence (DASV)**

The partnership supports ongoing DASV initiatives through day to day work but in addition to this has specifically taken part in the 16 Days of Action campaign and has committed to cross-partnership engagement in domestic abuse and sexual violence campaigns, awareness raising both within communities and our own organisations.

A high profile publicity campaign was delivered in November and December 2018 which is set to be repeated in 2019. Ongoing awareness of domestic abuse, violence, stalking and harassment has taken place within the City and County Councils and partner agencies. Work has included training sessions, management awareness on how to support team members, introduction of domestic abuse policies for staff and ongoing information sharing to staff on various DASV topics.

### **ACEs**

Adverse Childhood Experiences (ACEs) are proven to play an intrinsic part in peoples lives and affect their interactions with others. Without the presence of resilience factors which help to overcome ACEs, people who experience ACEs go on to face negative challenges in adulthood which can include entering the criminal justice system, living with long term health impacts, relationship breakdowns and misuse of drugs or alcohol. By identifying what challenges someone has faced in life, services can work with them to support them more holistically, leading to more successful and sustainable life changes as well as breaking the cycle for future generations.

Throughout 2018 partners in the SSGP have worked to raise awareness of ACEs within their own organisations with a view to shaping services to be more ACEs informed, with the aim of being able to support people better. ACEs training has taken place throughout the year, with many agencies attending. ACEs awareness is now being embedded in service provision including associated work such as trauma informed spaces. Work with communities has also focussed on raising awareness of ACEs, with agencies working in Kingsholm particularly and aiming to help it to become an ACEs aware community.

- Gloucestershire Constabulary have been delivering ACE awareness sessions. More than 1000 people have attended events communicating the key messages from the ACEs Strategy including schools, Early Help, Educational Psychologists and community partners
- More than 100 people have signed up to become ACEs Ambassadors. Ambassadors come from a range of organisations, communities, experiences and backgrounds.
- ACEs is being embedded across the workforce via the Gloucestershire County Council Social Work Academy and mandatory safeguarding training.
- ACEs training provided to all primary care GPs in the City.
- All rough sleeping services are ACEs aware and work in a multi-agency approach to address these.

## Protection

### **Focus area- Kingsholm**

Trends such as drug use, housing, high levels of police incidents and high demand for social care led to Kingsholm being chosen as a focus area for the partnership to bring together services and work with the community in a more resident-led approach to address issues of concern.

Led by colleagues from the Early Help Partnership, the work in Kingsholm has focussed on engaging with residents to understand how we can work together to overcome issues based on what was important to them, instead of relying solely on data from agencies. A community builder for Kingsholm was funded with money from the NHS with part of their aim of addressing community safety as a public health and wellbeing issue. The community builder has connected many residents in the area and seen an increase in resident-led activity. Colleagues from Early Help and City Council have done intensive work in the area with guidance from the community builder, to engage with residents and address particular issues. Work in Dexter Way has seen an increase in resident led activity and the partnership will continue to support residents to become better connected with their neighbours, a factor which is known to increase safety in neighbourhoods.

- Public Health have signed up Kingsholm doctors surgery to deliver NHS Health Checks, a cardiovascular risk assessment for all adults aged 40-74 years who don't already have cardiovascular or related diagnoses.
- A Healthy Lifestyles Service coach is allocated to work in the most deprived areas of Kingsholm to engage with community groups and services to promote the Healthy Lifestyles and support residents.
- Local PCSOs dedicated to Kingsholm continue their work building relationships and carry out engagement opportunities as and when they can.
- Community building work has connected about 10 residents in that area that had never met before. Through this, residents have gone on to make their own connections with other

neighbours and a facebook page has been set up to connect residents further. A space has been cleared in the area for a community garden and funding secured for materials etc.

- Community Builders continue to engage with residents to find out more about what they would like from their neighbourhood.
- Kingsholm School have commented that they have noticed more cohesion amongst parents.
- Resident led Kingsholm Community group set up and includes members of the settled and traveller community.

### **Dangerous Drug Networks**

Alongside regular reviews of crime trends, during 2018 the partnership focussed on Dangerous Drug Networks (DDNs - otherwise known as County Lines). Proactive work has been undertaken by Police and other partner agencies, including support from Solace with closure orders on premises that have been cuckooed. Cuckooing is where a person (often a vulnerable person) has their home taken over by drug dealers to use as a base for drug distribution. Strong partner agency working has seen Police and housing working together more which has meant victims of cuckooing have been treated as victims and rather than having enforcement action taken against them too, they have been able to access additional support and be relocated to safer accommodation where needed. Working with housing providers to raise awareness of County Lines has seen consideration of sensitive lettings plans in certain areas and increased support for residents.

- Gloucestershire Constabulary put out proactive messaging to the community as part of County Lines awareness weeks along with community engagement to raise awareness amongst residents and partner agencies.
- Police have information on their website - [www.gloucestershire.police.uk/operations/operation-tarak/](http://www.gloucestershire.police.uk/operations/operation-tarak/)
- Change Grow Live (CGL, Gloucester's commissioned drug and alcohol support service) have worked constructively with the police where vulnerable adults are identified.

### **Nightsafe**

NightSafe is a multi-agency partnership of agencies who work in the night time economy. A Memorandum of Understanding is currently being produced which outlines the roles and responsibilities of each partner, including the voluntary and community sector.

Policing of the night time economy has seen a reduction during 2018 but with partners sharing responsibilities for night time safety, the impact of policing reductions has been minimal. Schemes such as Street Pastors, Taxi Marshals, Ask Angela and regular multi-agency operational briefings over weekends have ensured strong partnership working which has resulted in Gloucester City being awarded Purple Flag status for safety in the night time economy.

### Response

#### **Review of Gloucester crime statistics**

Regular review of crime and anti-social behaviour statistics has allowed the partnership to support multi-agency work to address trends such as youth anti-social behaviour, knife crime concerns and Dangerous Drug Networks. Multi-agency work to address these has also been able to incorporate ACEs awareness, bring together support for individuals and adopt assertive outreach to challenge negative behaviours.

## **Street Aware**

Street Aware was introduced in 2016 to tackle street based nuisance in the City centre, initially focussing on begging. During 2018 it expanded to address street drinking and youth anti-social behaviour. Alongside the introduction of a PSPO (Public Spaces Protection Order), the Street Aware approach has seen a decrease in street drinking in the City centre and increase in engagement and offers of support with those seen street drinking. Street Aware approach focusses on “engage, support, enforce” with enforcement as a last resort and engagement and support aimed at tackling the root causes of issues. Monthly meetings bring together support and enforcement agencies to agree a way forward for each individual case. Youth Street Aware works with other partnership initiatives and police operations to avoid overwhelming young people with too many agencies to work with. The two strands to youth Street Aware are casework - which focusses on intensive, co-ordinated multi agency work with ringleaders of ASB incidents - and community building with young people which aims to understand how and why they use the city centre, increasing connectivity between young people and local businesses and feeding the voice of young people into services.

Since the beginning of 2018:

- 28 individuals worked with in relation to begging
- 28 referred for support from various agencies
- 2 have had enforcement action taken (anti-social behaviour injunctions)
- for street drinking, a core group of 10 individuals engaged with
- For youth ASB, 20 young people engaged with and all offered support
- 5 young people have been arrested over this time – 3 arrested only once, two on multiple occasions
- No injunctions against street drinkers or young people

## **Action Glos**

Action Glos is a social impact bond model of support for entrenched homeless or those in an ongoing cycle of homelessness. The project focusses on outcomes for the individual and aims to work effectively in partnership with projects aimed at supporting vulnerable people with complex needs to make sustainable changes in their lives. This partnership approach to supporting rough sleepers and those in cycles of negative behaviour also links heavily with Street Aware, Bluelight Project and has had crossover with DDN work.

- 117 people housed since the project started
- 94 sustained accommodation for 3 months,
- 52 sustained accommodation for 6 months and 12 for one year
- 47 people working with drug or alcohol support, with 31 achieving 3 month sustainment

The SSGP is working towards key data outcomes over the next six years. Progress on these so far is shown below:

<u>Measure</u>	<u>2018</u>	<u>Goal- 2024</u>	<u>2019</u>
Index of Multiple Deprivation	139/ 326	155/326 (5% improvement)	
LSOAs in the City	19	18 LSOAs in the City (5% improvement)	
% of adults who are 'physically inactive'	25.3%	20.0 % (continued trend)	
Life expectancy	male 77.9, female 82.2	Male 79.5, female 83.1 (Nat average)	
Crime (per 1000 pop)-	81.5	55.2 per 1000 (county rate)	
ASB incidents (per 1000 pop)-	55.0	37 per 1000 (county rate)	
Collaborative commissioning projects	SIBs (2), CB Kingsholm, TH Project	50% increase	
Social Mobility-	Ranked 282	Ranked 266 (5% improvement)	
% adults are overweight or obese	65.8%	61.3% (Nat average)	
Deaths seen as preventable	223 per 1000	182 per 1000 (Nat average)	
Annual Homeless Count	6	0	

Partners who have actively participated in the Stronger Safer Gloucester Partnership this year are:

- Gloucester City Council
- Public Health Commissioners
- Early Help Partnership
- County Hate Crime strategic group
- Gay Glos
- Solace, anti-social behavior team
- Gloucestershire Fire & Rescue Service
- Health & wellbeing board representatives
- Gloucester City Homes
- Victim Support
- Police
- Office of the Police and Crime Commissioner
- County Homelessness Coordinator

The SSGP is part of a wider network of partnerships across the City which also includes:

- Safer Gloucestershire
- Health and Wellbeing Board
- Integrated Locality Partnerships
- Prevention and Self Care Board
- Safeguarding Children and Adults boards
- Early Help Partnership
- Gloucester BID
- Daysafe
- Nightsafe



# Stronger Safer Gloucester Partnership Strategy

Updated April 2019

# Purpose

The Partnership is the strategic group responsible for the wider wellbeing, health and community safety agenda in the City of Gloucester.

The Partnership will build on the strong relationships that exist between partner agencies in our City, bringing together the people who have the ability, resources and commitment to make things happen.

We will be supportive and challenging in our work in order to link the engagement, prevention and enforcement agendas. We will work collectively and use positive problem solving methodologies in our work to shape our shared response.

# What will the Partnership do?

- Page 176 Translate strategic priorities and data analyses into a partnership delivery framework with appropriate resources to make things happen.
- Look at the causes of harm and vulnerability in our community; ensure that there is a collective response.
- Tackle priorities and achieve positive outcomes for communities by commissioning specific, time-limited task and finish groups or specific pieces of work.
- Influence, facilitate and drive priorities and commissioning processes through its understanding of data, evidence, intelligence, needs, resources, priorities and outcomes.
- Mobilise, align and deploy available resources to deliver the agreed partnership priorities and look to community-based solutions where possible.
- Monitor and review the outcomes of the partnership, providing accountability to members who will be expected to set out their own organisation's operational commitment to the Partnership's priorities.
- Remove barriers to partnership working and delivery.
- Identify where gaps in service provision exists and how these could be addressed by bringing forward new ways of working to overcome long-standing or complex problems.
- Have regard to the priorities of the Gloucestershire Police and Crime Commissioner.
- Ensure that partnership activity is publicised to the communities of Gloucester.

# Data

This document contains a range of data-

- 1- High level aspirational measures- these represent our current (to recent data documented) and aspirational goals for the City which will bring us closer in line with either National or County averages. This will be updated annually where possible and where data availability allows.
- 2- Low level, project specific data or local crime data- this is shorter term and less able to reflect trends. It is however regularly updated and easier to access.

Context		Shared Long-term Outcomes (6 years)		
		Measure	Current	Goal- 2024
<ul style="list-style-type: none"> <li>Review carried out in June-September 2017</li> </ul>		Index of Multiple Deprivation	139/ 326	155/326 (5% improvement)
<ul style="list-style-type: none"> <li>15 Partners in regular attendance</li> </ul>		LSOAs in the City	19	18 LSOAs in the City (5% improvement)
<ul style="list-style-type: none"> <li>TORs updated (Jan 2018) and reviewed (March 2018)</li> </ul>		% of adults who are 'physically inactive'	25.3%	20.0 % (continued trend)
<ul style="list-style-type: none"> <li>6 new partners attending regularly</li> </ul>		Life expectancy	male 77.9, female 82.2	Male 79.5, female 83.1 (Nat average)
<ul style="list-style-type: none"> <li>Challenging economic situation for the majority of partners.</li> </ul>		Crime (per 1000 pop)-	81.5	55.2 per 1000 (county rate)
		ASB incidents (per 1000 pop)-	55.0	37 per 1000 (county rate)
		Collaborative commissioning projects	SIBs (2), CB Kingsholm, TH Project	50% increase
		Social Mobility-	Ranked 282	Ranked 266 (5% improvement)
		% adults are overweight or obese	65.8%	61.3% (Nat average)
		Deaths seen as preventable	223 per 1000	182 per 1000 (Nat average)
	Annual Homeless Count	6	0	
	Note- Long term measures identified through a range of methods incorporating a range of issues including health, wellbeing and safety. The majority of targets relate to either a National or County average, whichever is closer to our current position.			
Themes	Projects/Measures			
<div style="writing-mode: vertical-rl; transform: rotate(180deg);"> <p>Page 177</p> <h1>Prevention</h1> </div>	<p><b>Vulnerable Women Project (Holistic support)-</b>  Objective- reduce engagement of 16 women with statutory services and provide strategic oversight.  Action- To ensure that there is City wide support and awareness of this work and critically evaluate how our services meet the needs of these individuals.  Lead- Kath Rees  Measures- Review evaluation and reflect on learning to evaluate practice as commissioners.  Timescale- starts April 2019 for 2 years</p>			
	<p><b>HEALTH</b>  Objective – supporting the work of partners in public health and Integrated Locality Partnerships by exploring co-production with the aim of reducing health inequalities in the City  Action – particular focus on mental health, obesity and physical activity  Lead – Emma Savage, Anne Brinkhoff?  Measures – co-produced initiatives, reflect on learning to evaluate practice as commissioners.  Timescale – from May 2019</p>			
	<p><b>Previous priorities now embedded.</b> Regular updates to be provided at meetings:</p> <ul style="list-style-type: none"> <li><b>Bluelight Group</b> – holistic and assertive outreach work with entrenched, change resistant drinkers. <b>Leads</b> – Steve O’Neill, Emily Bolland</li> <li><b>DASV</b> – raising awareness of DASV, support and services. Partnership supported publicity. <b>Leads</b> – Anne Brinkhoff, Kath Rees</li> <li><b>ACEs</b> (adverse childhood experiences) – increase awareness and understanding to be used in commissioning &amp; shaping services. <b>Lead</b> – Ruth Saunders</li> </ul>			

# Protection

<p><b>Intensive Engagement in Widden</b>          Objective- To pilot working with a focus area and measure impact through the intensive engagement method.          Action- Intensive Engagement working group to be supported by IE oversight group made up of key colleagues with experience of ABCD and strengths-based working          Lead- Emily Bolland, Neighbourhood Policing Inspector (TBC)          Measures – community led so will be defined throughout process. Progress reviewed at each meeting          Timescale- Review approach after one year</p>
<p><b>Knife Crime</b>          Objective – To greater understand and respond to local trends and understand where we are compared to the national picture          Action – Partners to update on work being undertaken to impact on knife crime, particularly focussing on the root causes of knife crime and the support available to prevent escalation          Lead – Emily Bolland, Jennie Watkins          Measures – raise awareness of root causes of knife crime and pathways of intervention and support          Timescale – review at each meeting with aim of one year for increased co-production and awareness</p>
<p><b>Previous priorities now embedded.</b> Regular updates to be provided at meetings:</p> <ul style="list-style-type: none"> <li>• <b>NightSafe &amp; DaySafe</b> – established partnerships aimed at keeping the City safe during the day and night time economies. <b>Leads</b> – Emily Bolland, Jennie Watkins</li> <li>• <b>DDNs and Organised Crime</b> – work as partnership to tackle Organised Crime in our communities. <b>Lead</b> – Neighbourhood Policing Inspector (TBC)</li> <li>• <b>Kingsholm Focus Area</b> – continue to feed back on partnership work happening in Kingsholm and support co-production and an ACES aware community. <b>Leads</b> – Abi Fletcher, Emily Bolland</li> </ul>

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# Response

<p><b>Street Aware</b>          Objective- Increase the safety and attractiveness of Gloucester City Centre particularly in relation to ASB. Strands for Begging, Street Drinking and Youth ASB.          Action- Work effectively in partnership with partners in City Centre, attend Street Aware meetings, and report to SSGP. Focus throughout 2019 on youth ASB and integrating youth community building alongside casework          Lead- Louise Boyle          Measures- Reduction in incidents of ASB in City Centre (from police data), reduction in numbers of individuals being monitored by Street Aware.          Timescale- Meetings are monthly, reports to SSGP will be prior to each meeting.</p>
<p><b>Gloucester Park</b>          Objective – increase the safety and attractiveness of Gloucester Park, increasing positive uses of the park to overcome negative ones          Action – work effectively with partners, including via DaySafe &amp; NightSafe and using strengths-based approaches where possible          Lead – Victim Support, others TBC          Measures – reduction in incidents in Gloucester Park and increased positive action          Timescale – to be reviewed after one year</p>
<p><b>Previous priorities now embedded.</b> Regular updates to be provided at meetings:</p> <ul style="list-style-type: none"> <li>• <b>Review Crime Statistics</b> – crime stats reviewed every other meeting to identify trends and responsive work. <b>Lead</b> - Neighbourhood Policing Inspector (TBC)</li> <li>• <b>Action Glos</b> – supporting entrenched homeless and people in cycles of homelessness, supporting vulnerable individuals to make sustainable change. <b>Lead</b> – Kathy Gibson, Kath Rees</li> </ul>

**Appendix 1- Projects** The below table is information regarding projects supported by members of the SSGP which will be updated on an annual basis.

Lead Organisation	Project name	Project aims
Community Roots CIC	Gloucester Park	Create a safer and regenerated Gloucester park that is cared for by confident, skilful and well connected community members and to create sustainable solution for the future care and management of the park.
Coney Hill Working Group	Echoes#2	Provide distraction activities away from ASB in the local area. It will help the young people to develop some community pride & help identify the strength that is within the community. Hopefully resulting in a stronger community more resilient to negative effects upon it. The project will be run by volunteers totally giving up their time. The Vibe has been provided as the building free of charge to help establish the project.
Friendship Café	Friendship Café Boxercise	Train complete beginners with the skills of amateur boxing, with a view to giving them confidence, instilling discipline, occupy their time constructively and make them proud of the area and link them up to other opportunities.
Furniture Recycling Project	Volunteer to Belong	Working in partnership with GARAS we will invite new migrants to volunteer at FRP. We will place them carefully according to their needs, interests and abilities. This will effectively be an induction to life in the UK, with training offered and valuable opportunities to practice English.
GL COMMUNITIES	Phoenix –Older but still Creating	The aim of the project is to support Older but not overlooked people as part of the Social and Community Inclusion Project which supports older people from the community, those living in residential care and those living in supported housing.
Gloucester City Football Club	Community Tigers	1. Community Tigers aim to provide a safe place for participants to take place in sport instead of hanging around in the streets causing anti-social behaviour by providing a safe environment for our participants when participating in our activities, both during the day and during the night (later stages of the evening) We provide positive role models for our participants so that they have someone to look up to and show a positive pathway, using prison mentors to tell their stories on how one decision can change your life as the prison mentors have experienced the negative pathway.
Gloucester City Safe BID Gloucester City Council	Gloucester City Wardens	To provide a highly-visible uniformed presence of City Wardens that contributes to maintaining and improving community safety for businesses, customers, residents and visitors to the city.

Gloucester FM	Bringing Communities together	The aim of the project is to engage and give primarily but not exclusively black and minority ethnic young people in the community access to training and volunteering opportunities which will help improve their chances in life through the community radio station. To help create a stronger community in Gloucester, particularly within the black and minority ethnic communities in which members of the community will become more active and will work together to solve their problems.
Gloucester street Pastors	Gloucester street Pastors	Our aim is simply to 'care, listen and help' folks out in the city clubs and pubs with practical acts of support.
Gloucestershire Bike Project CIC	3rd Gear	The overarching aim of the project is to set up a network of older volunteers, informal 'stay safe, stay connected' ambassadors in their communities; who help reduce and prevent crimes targeting older people, reducing demand on police services and helping create safer, more caring, supportive places in which to grow old.
Gloucestershire Constabulary	Barton & Tredworth Cultural Fayre 2017.	The overall aim is to encourage a greater community cohesion between the various cultures living in the Barton and Tredworth area of Gloucester.
Gloucestershire Constabulary	Gloucestershire Youth Mini Bike Project	We provide young people aged 6 to 16 years old with a safe, controlled and legal environment to ride mini motos away from the highways and public spaces.
Gloucestershire Constabulary	National star college Paid work placement scheme	To provide paid work for National Star College students who are capable of performing an administrative role for the Constabulary
Gloucestershire constabulary -Glos city homes	Junior wardens	The Junior Warden Scheme is an after school club run in partnership with Glos Police, Local Primary School, Glos City Homes and local Youth Groups. The sessions will teach the wardens how to identify issues in the community and how to resolve them or who to contact to discuss sorting the issues.
Gloucestershire Music Makers T/A The Music Works	Making It	The aim of the pilot project is to develop and test a music mentoring intervention that builds character building attributes that lead to a reduction in anti-social behaviour and offending in young people as well as increasing their wellbeing. The programme is being co-designed with the youth justice team from Youth Support as well as young people from our targeted cohort.
Kingfisher Treasure Seekers	Support at The Cavern Activities	We are planning to set an activity programme for people attending Support at The Cavern (and others who may benefit) which operates at least 3 nights per week, giving people the opportunities for development.

Kingsway Primary School	Freedom Programme at The Beacon	To run The Freedom Programme on a rolling programme until December 2018. To purchase "Living with the dominator" book & workbook for 10 participants for 4 courses.
Roots coffee and community	Roots coffee and community	Roots ultimately aims to make Kingsholm and more positive, safer, friendlier, supportive and healthier place to live, and to help combat loneliness and reduce social isolation. We aim to provide a "third space" for people to gather and to find support and friendship.
The Venture: White City	Community Matters	The Venture provides free, open access, supervised play sessions afterschool, at weekends and during all school holidays for local children, young people and their families.
The Venture: White City	Community Counts	To maintain the activities and services that the Venture provides and to extend these services and develop the role of the Venture as a community hub. Currently the Venture provides free, open access, supervised play sessions after school, at weekends and during all school holidays but we want to extend this to staffing the site so that services and facilities can be accessed during the school day.
The Wiggly Worm Ltd.	Community Kitchen (NAME TBC)	This is a partnership project between The Wiggly Worm and Kingfisher Treasure Seekers. Together we will establish a thriving, accessible community kitchen. Our principle aim is to provide a supportive, practical and life-enhancing environment where adults with mental health challenges can cook and share meals.
Page 181 Together in Matson	Redwell Centre	Working with and without other agencies to reach the most vulnerable, disadvantaged people of all ages and abilities to overcome their barriers to self development and build community capacity to assist community cohesion.
Youth and Community Services	All Welcome	The aim of All Welcome is to enable Czech young people to positively engage with their wider community. The project gives them a safe space, meeting weekly during the evening, whilst welcoming any young person from the Barton & Tredworth area.
Public Health, Gloucestershire County Council	Blue Light Project	Implemented by Public Health and Alcohol Concern, this multi-agency group aims to work intensively with change resistant drinkers who are impacting on blue light services or the wider community due to their drinking (for example alcohol related anti-social behaviour, misuse of emergency services or involvement in or being a repeat victim of crime). Brings together partner agencies to support individuals holistically and assertively, with a focus on health and wellbeing.
Chaired by Lianne Panting from Victim Support	Safer Estates Steering Group for Gloucester	This group is a forum to discuss high risk ASB cases and share information between agencies working in partnership with each other for a safer community.

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<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>11 September 2019</b>
<b>Subject:</b>	<b>Financial Monitoring - Quarter 1, 2019/20</b>		
<b>Report Of:</b>	<b>Cabinet Member for Performance and Resources</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Jon Topping, Head of Policy &amp; Resources</b>		
	<b>Email: jon.topping@gloucester.gov.uk</b>	<b>Tel:</b>	<b>396242</b>
<b>Appendices:</b>	<b>1. Progress against savings targets</b> <b>2. Capital monitoring</b>		

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

1.1 For Cabinet to note year-end forecasts, and progress made against agreed savings targets for the 1<sup>st</sup> Quarter ended 30<sup>th</sup> June 2019.

**2.0 Recommendations**

2.1 Cabinet is asked to **RESOLVE** that it be noted that:

- (1) the forecast year end position is currently for a decrease to the Council’s General Fund balance of £131k against a budgeted decrease of £91k.
- (2) the details of specific budgetary issues identified by officers and the actions being taken to address those issues
- (3) the current level of Capital expenditure as shown in Appendix 2.

**3.0 Background and Key Issues**

3.1 The figures contained within this report forecast the best estimate at the current time of the year-end position on the Council’s General Fund.

3.2 A summary table below shows the projected position for each portfolio with a further detailed table analysing the variances in more detail.

**4.0 Whole Council Summary**

4.1 The forecast position is a decrease of the Council’s General Fund by £131k as shown in the table below. At this early stage of the financial year most budgets are assumed to be on target and only those areas which are already known to be a budget pressure have been incorporated into this report. Where such variances have been identified officers will work towards ensuring a balanced position at year

end. Therefore, although the forecast is currently for a overspend of £40k there can be some confidence that this will have been turned into a balanced position by the end of the year.

<b>Council Summary</b>	<b>Year</b>			
	<b>19/20 Budget</b>	<b>Actual</b>	<b>End Forecast</b>	<b>Final Variance</b>
Regeneration and Economy	(3,250)	1,447	(3,148)	102
Communities and Neighbourhoods	1,460	(144)	1,470	10
Performance and Resources	5,552	4,552	5,348	(204)
Culture	921	419	970	49
Planning and Housing	82	(73)	153	71
Environment	4,082	1,015	4,066	(16)
Corporate and Funding	(8,756)	10,344	(8,637)	119
<b>Total</b>	<b>91</b>	<b>17,560</b>	<b>222</b>	<b>131</b>

- 4.2 The budget monitoring undertaken during 2019/20 will inform if any pressures or opportunities can be included in Money Plan to be presented to Council in February 2020.

## 5.0 Regeneration and Economy

<b>Regeneration &amp; Economy</b>	<b>Year</b>			
	<b>19/20 Budget</b>	<b>Actual</b>	<b>End Forecast</b>	<b>Final Variance</b>
Economic Development	199	164	228	29
Asset Management	741	273	733	(8)
Commercial Property	(3,319)	1,170	(3,154)	165
Parking	(1,238)	(354)	(1,345)	(107)
Senior Management	473	216	527	54
Markets and Street Trading	(106)	(22)	(137)	(31)
<b>Total</b>	<b>(3,250)</b>	<b>1,447</b>	<b>(3,148)</b>	<b>102</b>

- 5.1 This portfolio is currently forecast to be over budget by £102k.
- 5.2 The current forecast reports reduced income from commercial property during 2019/20. The regeneration of Kings Walk is underway, but the present forecast is for rent income during 2019/20 to be lower than that budgeted for the year. Some of the Kings Walk rent reduction is mitigated by the rent guarantee sums agreed when the contract was entered into in 2017.
- 5.3 The new parking enforcement contract and the investment in ticket machines during 2018/19 are continuing to deliver improved income levels and overall the parking service is currently forecast to generate additional income of £107k.

## 6.0 Communities and Neighbourhoods

Communities and Neighbourhoods	19/20		Year	
	Budget	Actual	End Forecast	Final Variance
Voluntary Sector Grants	135	15	130	(5)
Community Strategy and Other Projects	145	66	177	32
Homelessness	1,174	(184)	1,174	(0)
Shopmobility	76	17	52	(24)
Health and Safety	3	(1)	(1)	(4)
Private Sector Housing	(73)	(57)	(62)	11
<b>Total</b>	<b>1,460</b>	<b>(144)</b>	<b>1,470</b>	<b>10</b>

- 6.1 This portfolio is currently forecasting to achieve its budgeted targets.
- 6.2 The Council continues to experience significant costs in relation to the placing of homeless families in temporary accommodation; many of whom have complex needs. This is largely due to a general shortage of social rented housing or affordable rented housing. These increased costs are partly recoverable through the housing benefit system and positive steps have been taken to ensure that the amounts recovered are being maximised.
- 6.3 During Q1 the Council has taken positive steps to reduce this temporary accommodation cost by entering into a loan and grant arrangement to allow Cheltenham YMCA to buy properties at Potters Place which are subject to a Nominations Deed between the Council and the YMCA for the placement of homeless people. This is forecast to reduce the homelessness costs from Q3 onwards and allow this service to meet its budget.
- 6.4 A flexible homelessness prevention grant has been received from Government and much of this will be used to fund the in-year costs, as well as to further develop alternative sources of temporary accommodation provision to reduce pressures in the longer term.

## 7.0 Performance and Resources

Performance and Resources	19/20		Year	
	Budget	Actual	End Forecast	Final Variance
Internal Audit	190	(3)	175	(15)
Financial and Corporate	1,238	343	1,117	(121)
Revenues and Benefits Admin	912	392	829	(83)
Housing Subsidy	(377)	2,699	(294)	83
IT	1,522	772	1,475	(47)
Human Resources	278	30	239	(39)
Communications	89	0	86	(3)
Legal Services	394	0	388	(6)
Contact Centre and Customer Services	448	182	515	67
Democratic Services	858	137	818	(40)
<b>Total</b>	<b>5,552</b>	<b>4,552</b>	<b>5,348</b>	<b>(204)</b>

- 7.1 The portfolio is currently forecast to be under budget by £204k. However, there are a number of significant variances contributing to that overall position.
- 7.2 The largest forecast adverse variance is against housing subsidy and benefits. The current forecast is to overspend by £83k, however it must be noted that the Council manage in excess of £42m of benefit payments and the smallest percentage change has a significant impact on this forecast in either direction.
- 7.3 The contact centre and customer services are forecast to overspend by £67k. This is a result of the current increased staffing within this service area related to the customer service transformation project that is currently underway with the move to the new reception area at the Gateway.

## 8.0 Culture and Leisure

Culture	19/20		Year	
	Budget	Actual	End Forecast	Final Variance
Museums	211	29	194	(17)
Food and Drink	(74)	4	(62)	12
Guildhall	40	6	43	3
Aspire Client	(30)	11	(29)	1
TIC	20	3	112	92
Great Place	0	(1)	0	0
Marketing Gloucester	261	263	261	0
Visitor Experience	493	104	451	(42)
<b>Total</b>	<b>921</b>	<b>419</b>	<b>970</b>	<b>49</b>

- 8.1 This portfolio is currently forecasting to have a overspend against budget of £49k.
- 8.2 The removal of the charges to visit the Museum of Gloucester and the relocation of the Tourist Information service have led to an increase in footfall. It is expected that this increased footfall will lead to increase in income from the shop, catering offer and the major exhibitions that are being staged this year (the summer Moon Exhibition and the autumn Puppet Exhibition). Any fluctuation in the level of income received may have a large financial impact and accordingly this income source will continue be monitored closely during the year.
- 8.3 As noted above the Tourist Information Centre transferred from its Southgate premises from 1<sup>st</sup> April 2019. This will see savings realised in relation to the property rental and upkeep. However, in the short term there will be the cost of a dilapidations bill payable under the terms of the lease to the landlord of the property. This amount is currently under negotiation.
- 8.4 The proposed transfer of the Life Museum is almost complete and the savings arising from this are forecast to be delivered during the year. There are still some ongoing costs in relation to the storage and management of the various exhibits. Income is being generated from the loan of museum exhibits. This is minimal at present but is seen as an area for development.

## 9.0 Planning and Housing

Planning and Housing	19/20		Year	
	Budget	Actual	End Forecast	Final Variance
Housing Strategy and SIB	0	(150)	(0)	(0)
Planning	82	77	153	71
<b>Total</b>	<b>82</b>	<b>(73)</b>	<b>153</b>	<b>71</b>

9.1 This portfolio is currently forecast to be over budget by £71k during the year.

9.2 Income from Planning Fees provides a significant source of funding for the Service and is currently behind the budgeted levels. This income is affected by the timing and progress of applications made in respect of major developments. Some of the larger applications are still to be received. The current forecast is a prudent reflection of the expected receipt of these applications. Any fluctuation in the level of income received may have a large financial impact and accordingly this income source will continue be monitored closely during the year.

## 10.0 Environment

Environment	19/20		Year	
	Budget	Actual	End Forecast	Final Variance
Waste and Streetcare	4,742	1,100	4,745	3
Neighbourhood Management	19	3	30	11
Countryside and Allotments	87	23	86	(1)
Environmental Health	602	134	543	(59)
Flooding and emergency planning	107	65	105	(2)
Head of Service	62	16	65	3
Cemetery and Crematorium	(1,279)	(261)	(1,263)	16
Licensing	(258)	(65)	(245)	13
<b>Total</b>	<b>4,082</b>	<b>1,015</b>	<b>4,066</b>	<b>(16)</b>

10.1 This portfolio is currently forecast to be on budget for the year.

10.2 The saving within Environmental Health is largely a result of lower than budgeted staff costs.

10.3 Income at the Crematorium is forecast to be lower than 2018/19 as a result of Cheltenham crematorium now being back in operation. However the income for the year is expected to achieve the budgeted target for 2019/20.

### 11.0 Progress against savings targets

11.1 Full details of the Council's progress against its savings targets are shown at Appendix 1.

### 12.0 Capital Programme

12.1 The Capital Programme budget for the year is £3.5m including budgets carried forward from 18/19. The expenditure for the period to Quarter 1, including amounts committed totals £1.4m. Quarter 1 reports progress with the Councils main buildings improvement programme, work is progressing at the Guildhall, while work

has also been undertaken at 92-94 Westgate Street as part of the Councils transformation programme.

12.2 Quarter 1 has seen the continued investment in the Councils information technology as the Council implements technology to enable smarter ways of working, this investment is part of the programme ensuring the relocation from our offices at warehouses to our new offices at Shire Hall and The Gateway are successful.

12.3 The nature of capital projects means that many of them span a number of financial years; budgets are set per project any unspent budgets at the end of any one financial year may be carried forward into the next

12.4 A summarised table for the Capital Programme is shown as Appendix 2.

### 13.0 Prompt payment performance

13.1 The Council aims to make payments to all suppliers promptly and in accordance with contract terms. The performance on invoice payments during the quarter is below. The performance in the table shows the strong performance in supplier payments is being maintained.

	<u>Apr</u>		<u>May</u>		<u>Jun</u>		<u>Qtr 1</u>	
Number paid within 30 days	684	96%	563	97%	597	98%	<b>1844</b>	<b>97%</b>
Number paid over 30 days	30	4%	16	3%	14	2%	<b>60</b>	<b>3%</b>
Average Days to Pay (from receipt of invoice to payment date)	5		4		5		<b>5</b>	

### 14.0 Asset Based Community Development (ABCD) Considerations

14.1 There are no ABCD implications as a result of this report.

### 15.0 Alternative Options Considered

15.1 When considering how to reduce budgetary pressure or make savings officers explore a wide range of options.

### 16.0 Reasons for Recommendations

16.1 It is a good practice for members to be regularly informed of the current financial position of the Council. This report is intended to make members any of any significant issues in relation to financial standing and any actions that officers are taking in response to identified variances.

### 17.0 Future Work and Conclusions

17.1 Work will continue to reach savings targets or limit in year budget pressures. A further financial monitoring report will be produced for members at the end of the third quarter.

**18.0 Financial Implications**

18.1 All financial implications are contained within the report which is of a wholly financial nature.

**19.0 Legal Implications**

19.1 There are no legal implications from this report  
(One Legal have been consulted in the preparation this report.)

**20.0 Risk & Opportunity Management Implications**

20.1 There are no specific risks or opportunities as a result of this report

**21.0 People Impact Assessment (PIA):**

21.1 A PIA screening assessment has been undertaken and the impact is neutral. A full PIA is not required.

**22.0 Other Corporate Implications**

Community Safety

22.1 None

Sustainability

22.2 None

Staffing & Trade Union

22.3 None

**Background Documents:** None

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Savings Monitoring 2019/20

Prior Year Savings

Service	Details: aim of the project	Target £000	Achieved £000	In Progress £000	At Risk £000	Comments	Status
Policy & Resources	Reduce postage costs	(20)	0	(20)	0	Digital mail project is due to go live early in 2019/20	☹️
Policy & Resources	Property Investment Strategy	(50)	0	(40)	(10)	Interest on loans provided for delivery of services	☹️
<b>Total</b>		<b>(70)</b>	<b>0</b>	<b>(60)</b>	<b>(10)</b>		

Savings Target 2019/20

Service	Details: aim of the project	Target £000	Achieved £000	In Progress £000	At Risk £000	Comments	Status
Policy and Resources	Energy efficiencies and income generation opportunities	(50)	0	(50)	0		☹️
Policy and Resources	Property Investment Strategy	(100)	0	(50)	(50)	A number of projects are under review to deliver the expected income in year	☹️
Policy and Resources	Disposal of HKP warehouses	(100)	0	0	(100)	The disposal of the warehouses has commenced following relocation to Shire Hall and the Gateway.	☹️
<b>Total</b>		<b>(250)</b>	<b>0</b>	<b>(100)</b>	<b>(150)</b>		
<b>Savings Brought Forward</b>		<b>(70)</b>	<b>0</b>	<b>(60)</b>	<b>(10)</b>		
<b>Total</b>		<b>(320)</b>	<b>0</b>	<b>(160)</b>	<b>(160)</b>		

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Scheme	Budget	Actual	Variance	Forecast
	2019/20	Spend to date		
Kings Quarter development	1,000,000	137,201	862,799	1,000,000
Kings Walk Shopping Centre	-	47,226	(47,226)	-
City Centre Improvement Fund	409,860	-	409,860	394,860
GCC Building Improvements	148,371	474,609	(326,238)	248,371
ICT Projects	50,000	330,713	(280,713)	400,000
Housing projects	1,077,250	131,154	946,097	455,000
Drainage and Flood Protection Works	150,353	23,555	126,798	100,000
Townscape Heritage Initiative - HLF	120,115	42,377	77,738	120,115
Ranger Centre Barns/Storage	-	-	-	-
Horsbere Brook Local Nature Reserve works	76,698	1,128	75,570	76,698
Play Area Improvement Programme	116,560	60,000	56,560	100,000
Crematorium Cremator Improvements	-	-	-	-
Grant Funded Projects	19,614	119,164	(99,550)	169,614
Robinswood All Paths Project	49,683	707	48,976	49,000
Robinswood Hill	200,000	-	200,000	200,000
GL1 Emergency Works	46,490	-	46,490	46,490
<b>TOTAL CAPITAL PROGRAMME</b>	<b>3,464,994</b>	<b>1,367,833</b>	<b>2,097,161</b>	<b>3,313,658</b>

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<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>11 September 2019</b>
<b>Subject:</b>	<b>Strategic Risk Register Update and Risk Management Action Plan 2019/20</b>		
<b>Report Of:</b>	<b>Head of Audit Risk Assurance (Chief Internal Auditor)</b>		
<b>Wards Affected:</b>	<b>Not applicable</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Theresa Mortimer - Head of Audit Risk Assurance</b>		
	<b>Email:</b>	<b>Tel: 01452 396338</b>	
	<a href="mailto:Theresa.Mortimer@gloucester.gov.uk">Theresa.Mortimer@gloucester.gov.uk</a>		
<b>Appendices:</b>	<b>1: Strategic Risk Register as at 2<sup>nd</sup> July 2019</b>		
	<b>2: Risk Management Action Plan 2019/20</b>		

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

1.1 To present the Strategic Risk Register and the Risk Management Action Plan 2019/20 to Members for their awareness and consideration.

**2.0 Recommendations**

2.1 Cabinet is asked to **RESOLVE** that both the Strategic Risk Register and the Risk Management Action Plan 2019/20 be noted and endorsed.

**3.0 Background and Key Issues**

Background

3.1 ‘Risk management is the culture, process and structures that are directed towards effective management of potential opportunities and threats to the Council achieving its priorities and objectives’ – ALARM, the public risk management association.

3.2 The Accounts and Audit Regulations 2015 (part 2 paragraph 3) state ‘a relevant local authority must ensure that it has a sound system of internal control which...includes effective arrangements for the management of risk’.

3.3 Risk management is a key part of the Council’s corporate governance framework and internal control environment. It is one of the seven core principles within the Council’s Code of Corporate Governance – ‘managing risks and performance through robust internal control and strong public financial management’.

3.4 The Council’s Risk Management Policy Statement and Strategy provides the framework for the effective management of risks and opportunities within the Council,

supports decision making at all levels, and aids delivery of the Council Plan values, key actions and projects. The Strategy also includes the process for monitoring and reporting of strategic risks. The Risk Management Policy Statement and Strategy 2017–2020 was last updated and approved by Members in February 2017 (Cabinet approval following recommendation by Audit and Governance Committee).

- 3.5 The Risk Management Policy Statement and Strategy requires the Council to assess risks at a strategic level through documentation and management of the Strategic Risk Register. The Strategic Risk Register is owned and formally reviewed by Senior Management Team (SMT) on a regular basis. Strategic risk owners are at SMT level.
- 3.6 Member receipt and endorsement of the Strategic Risk Register is completed on a biannual basis by the Audit and Governance Committee and Cabinet. This is to enable Member awareness of the strategic risks facing the Council, the mitigation measures put in place to manage them and the impact on decisions to be made by the Council.
- 3.7 This report is the first Strategic Risk Register update to Members within 2019/20.

#### Strategic Risk Register – position and review

- 3.8 The process for officer review and update of the Strategic Risk Register includes:
  - Update of individual strategic risks by designated risk owners via the Pentana performance and risk management system (including risk scores, current control position, further mitigating actions required and their timing); and
  - Regular formal review of the Strategic Risk Register by SMT, including review and challenge of current strategic risks and consideration of potentially emerging strategic risks.

Operational Risk Registers are held at service, partnership and project levels. Where operational risks are high scoring or have potential strategic implications, these are also considered through the above process and added to the Strategic Risk Register where appropriate.

- 3.9 The Strategic Risk Register is documented in line with the Risk Management Policy Statement and Strategy risk register template and assesses strategic risks over three stages:
  - Original risk score: the impact and likelihood of a risk if no action were taken;
  - Current risk score: the impact and likelihood of a risk considering current controls in place; and
  - Mitigated risk score: the target risk score, achievable following full implementation of the agreed further mitigating actions.

Emerging strategic risks (risks that may have a future strategic impact) are also documented and considered by SMT.

- 3.10 The Strategic Risk Register was last reviewed, updated and agreed by SMT on 2<sup>nd</sup> July 2019. See **Appendix 1**.

### Strategic Risk Register – changes since last Member review:

- 3.11 The Strategic Risk Register version last reviewed by Members was as at 23<sup>rd</sup> October 2018. The main areas of Strategic Risk Register update between that date and 2<sup>nd</sup> July 2019 (**Appendix 1**) are summarised below:
- Strategic risk removed:
    - o No strategic risks have been removed from the register, to date within 2019/20.
  - Strategic risks added:
    - o Emerging strategic risks have been considered by SMT (including the progression and impact of Brexit and the implications of climate change); however no new strategic risks have been added to the strategic risk register to date within 2019/20.
- 3.12 As with the 23<sup>rd</sup> October 2018 Strategic Risk Register, this updated version has been produced for Member review from the Pentana performance and risk management system. Future risk registers submitted to Members will continue to reflect the direction of travel of risk scores.

### Risk Management Action Plan 2019/20

- 3.13 The Risk Management Action Plan 2019/20 was reviewed and agreed by SMT on 2<sup>nd</sup> July (**Appendix 2**).

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

- 4.1 There are no ABCD implications as a result of the recommendation made in this report.

## **5.0 Alternative Options Considered**

- 5.1 The alternative option is not to present the Strategic Risk Register to Members. This option is not compliant with the CIPFA: Audit Committees Practical Guidance for Local Authorities and Police (2018) and does not support strategic risk awareness or informed prudent decision making.

## **6.0 Reasons for Recommendations**

- 6.1 The Audit and Governance Committee's role (as per the Constitution) includes the function to 'monitor the adequacy and effectiveness of the Council's governance arrangements' including 'monitoring the arrangements for the identification, monitoring and control of strategic and operational risk within the Council'.
- 6.2 The CIPFA: 'Audit Committees Practical Guidance for Local Authorities and Police (2018)' confirms that the role of an Audit Committee includes keeping up to date with the risk profile of an organisation through regular review of the risk profile and areas of strategic risk.

6.3 The Risk Management Policy Statement and Strategy includes the following role and responsibility for Cabinet 'Endorse the content of the Strategic Risk Register and proposed risk mitigation plans, and monitor implementation'.

6.4 This report aims to meet requirements 6.1 to 6.3 and support Member delivery of their relevant roles and responsibilities.

## **7.0 Future Work and Conclusions**

7.1 Strategic Risk Register review will be completed on an ongoing basis by SMT, with the next formal presentation and agreement in October 2019. The next presentation to Audit and Governance Committee will be in March 2020.

## **8.0 Financial Implications**

8.1 There are no direct financial implications arising from the report recommendations. However, there are a number of risks within the Strategic Risk Register which, if not managed, have the potential to expose the Council to financial costs which are not provided for within existing budgets. The documented current controls and mitigating actions aim to manage the risk of Council exposure to these costs.

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

## **9.0 Legal Implications**

9.1 None specifically arising from the report recommendations.

9.2 It is fundamental that the Council has an embedded risk management framework (including a Risk Management Policy Statement and Strategy) which considers the identification, recording and management of risks to the Council in the delivery of its priorities and objectives.

9.3 The existence and application of an effective Risk Management Policy Statement and Strategy (including Member review of the Strategic Risk Register and awareness of strategic risks) assists prudent decision making. Failure to identify and manage strategic risks could lead to inappropriate decision making, unnecessary liability and costly legal challenge.

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

## **10.0 Risk and Opportunity Management Implications**

10.1 The lack of a robust approach to the management of risks and opportunities could result in inappropriately informed decision making and non-achievement of the Council's priorities and objectives at both strategic and service levels.

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

11.1 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 There are no 'Community Safety' implications arising out of the recommendations in this report.

### Sustainability

12.2 There are no 'Sustainability' implications arising out of the recommendations in this report.

### Staffing and Trade Union

12.3 There are no 'Staffing and Trade Union' implications arising out of the recommendations in this report.

## **Background Documents:**

- Accounts and Audit Regulations 2015
- CIPFA: Audit Committees Practical Guidance for Local Authorities and Police (2018)
- Council Constitution (current)
- Risk Management Policy Statement and Strategy 2017- 20

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# Strategic Risk Register Report as at 2<sup>nd</sup> July 2019

## SRR1 Strategic Risk Register

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
SRR1.1	Non achievement of the Money Plan – including the annual savings / income targets and the result of a balanced budget	4	4	16	<p>*Budget setting process – including consultation; management/leadership input into savings targets; and Overview &amp; Scrutiny and Council involvement.</p> <p>*Forecasting Money Plan for medium term.</p> <p>*Allocation of individual savings/income targets to an SMT sponsor, Cabinet Member and leading manager.</p> <p>*Rigorous monthly monitoring of the Council's financial position - monthly budget monitoring (including budget savings programme lines) at budget holder level (Finance led) and by SMT.</p> <p>* Financial Services staff professionally qualified in accountancy-related disciplines.</p> <p>*Assurance reviews by Internal Audit to ensure compliance with approved policies and procedures.</p> <p>*Service Plans aligned with resources and subject to regular review.</p>	3	2	6			3	2	6	Head of Policy & Resources

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Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
SRR1.2	Adverse public and media relations	3	3	9	*Dedicated communications and marketing resource with defined service scope – service delivery by County Council (SLA). *Regular monitoring of press coverage. *Formal route for media press contact (controlled approach). *Standardised FOI approach with FOI Champions. *Dedicated support for key consultations. *Communication Strategy on key campaigns, including performance measures. *Internal Communications Channel Plan. *Complaints policy / monitoring. *Digital communications team in place – including objectives, policies and procedures. *Approved campaigns plan in place. *Release of new Council website. * Completion of media training for Members and key officers	3	2	6			2	2	4	Corporate Director - Partnerships
SRR1.3	Lack of competence, staff engagement, probity and professionalism within the authority	3	3	9	*Dedicated HR resource with defined service scope – service delivery by County Council (s101 agreement). *Adherence to best practice recruitment and selection procedures and principles. *Member and staff training.	3	2	6	Further review and development of the apprenticeship scheme	31-Aug-2019	3	1	3	Corporate Director - Partnerships
									Workforce Strategy Action Plan approval and delivery	30-Sep-2019				

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
	leading to diminished performance, inappropriate behaviour, and failure to comply with governance arrangements				*Complaints monitoring. *Member role descriptors. *Codes of conduct for members and officers. *Defined officer roles. *Staff 1:1s and performance appraisals. *Disciplinary procedure. *Adherence to health and safety Policy and procedures. *Staff survey. *Staff engagement activities. *Governance Group bi-monthly meetings. *Council Values and behaviours refreshed and adopted. *Development Plan and Learning & Training Plan in place. *OD Plan in place. *Talent management scheme and apprenticeship scheme in place. *Together Gloucester phase 1 (transformation) delivery. *Provision of comprehensive Policies and Management Guidance Notes on the intranet on all aspects of people management and core HR topics, including performance, behavioural standards expected and conduct. *Dedicated Staff Wellbeing Working Group tasked with developing/ procuring health and wellbeing initiatives for staff and increasing staff									

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
Page 204					<p>engagement in such activities.</p> <p>*Culture Action Plan setting out key actions arising from Staff Survey covering a range of areas including Performance and Workload Management, Member-Officer Relationships, Council Transformation and Wellbeing.</p> <p>*Staff Engagement Index – annual measure to assess level of engagement as part of Staff Survey.</p> <p>*Gender Pay Working Group and Action Plan to ensure that our family friendly offer is competitive and we attract and retain the best staff.</p> <p>*Comprehensive staff benefits offer.</p>									
	SRR1.4	Failure to effectively manage contracts and SLAs with key partners / other significant bodies, including: Amey, Civica, Marketing Gloucester, Aspire, Gloucestershire Airport, VCS organisations,	3	3	9	<p>*Central list held of all contracts and SLAs with named responsible officers and Members.</p> <p>*In set up of the partnerships:            * Corporate procurement strategy and procedures;            Contract Standing Orders;            Constitution requirements;            and Availability of advice from legal, finance &amp; procurement.            * Documentation on the Council contracts register.            *Partnership specific controls required (for each partner);            *Documented signed SLA.</p>	3	2	6	Together Gloucester Phase 2, Work Package 5	30-Sep-2019	2	2	4

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
Page 205	Gloucestershire County Council (e.g. Audit shared service) a				<ul style="list-style-type: none"> <li>*Lead contact officers assigned to each partner.</li> <li>*Regular performance management meetings, with reporting to SMT/Committee.</li> <li>*SLAs incorporate contingency business plan approach to mitigate loss of service.</li> <li>*Partnership risk registers – either individually or within the service risk register.</li> <li>*Governance arrangements identifying where decisions are taken.</li> <li>*Agreement of SLA KPIs, performance standards and payments (within contract).</li> <li>*Ongoing negotiation with partners to review current contract contents, to ensure up to date (e.g. GDPR considerations) and fit for purpose.</li> </ul>									
	SRR1.5	Failure to support and enable business growth within the city	3	3	9	<ul style="list-style-type: none"> <li>*Support local businesses both start up and new - 'Better Business For All'.</li> <li>*Partnership support for skills/jobs and attraction of inward investment.</li> <li>*Council's promotion of city through links with GFirst LEP; Marketing Gloucester; and with adjacent authorities (e.g. JCS).</li> <li>*Cultural Strategy – including 6 monthly review and update.</li> <li>*Liaison with Business Improvement District</li> </ul>	3	2	6	City Plan development and delivery	31-Dec-2019	2	2	4

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
					(including consideration of uncertainties arising from the UK leaving the EU). *Regeneration and Economic Development Strategy in place. *Ongoing review and bidding for regeneration funding, with continued focus on regeneration sites.									
SRR1.6	Loss of finance, resource and reputation due to fraudulent activity	4	3	12	*The following are approved policies available to officers: -Anti-fraud and corruption strategy (including Anti-bribery policy and Anti-money laundering policy). -Whistle blowing policy. -Fraud response plan. *Financial regulations (including standing orders). *Existing internal control framework. *Internal Audit inc. Audit & Governance Committee and annual risk based internal audit plan (deterrent). *External audit presence (deterrent). *Benefit case referral to the Single Fraud Investigation Service – DWP. *Brilliant Basics modules (fraud awareness, project management and influencing skills) available to management team. *SLA with ARA (County hosted) for drawdown of days from Glos. Counter Fraud	4	1	4			4	1	4	Head of Policy & Resources

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
					Unit for targeted anti-fraud work – Council position reviewed monthly by S151 Officer and Chief Internal Auditor.									
SRR1.7	Failure to deliver key regeneration priorities (including Kings Quarter and Blackfriars)	3	3	9	*Regeneration Advisory Board. *Capital Monitoring Steering Group & existing capital programme controls. *Brilliant Basics modules (project management and influencing skills) available to management team. *Project specific controls that should be in place: -Project plans in place for major schemes. -Project review meetings led by experienced/qualified Members and Officers with third party links/presence (e.g. developers and associated commercial agents). -Project update reporting to Cabinet and Council (in line with project plan milestones). - Re-assessment of projects at appropriate points to review objectives and deliverables. - Maintenance and review of project risk registers for each regeneration project. -Ongoing internal review and financial scrutiny of projects.	3	2	6	Together Gloucester Phase 2, Work Packages	30-Sep-2019	2	2	4	Head of Place
SRR1.8	Failure to manage	4	4	16	*IT Security: -Civica ITO contract includes	4	2	8			4	1	4	Head of Policy & Resources

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner	
	information in accordance with legislation				<p>key IT security control continued delivery with ongoing client monitoring required.</p> <ul style="list-style-type: none"> <li>-Virus protection (desktop, server, email, attachments etc) and fire wall controls.</li> <li>-Monitoring of internet access and restriction on sites permitted to access</li> <li>-E-mail content scanning (incl. Forcepoint).</li> <li>-Physical security and protection of IT suite.</li> <li>-Procedures for login lockdown when IT staff leaving organisation.</li> <li>-Data cleansing of IT equipment prior to disposal.</li> <li>-Client monitoring (in-house intelligent client function) team in place.</li> <li>-IT risk register monthly review and update by the IT Operations Board.</li> <li>*Use of information: <ul style="list-style-type: none"> <li>-FOI procedures; standardised approach; &amp; FOI Champions.</li> </ul> </li> <li>-Information management rules within the Constitution.</li> <li>-Data Protection guide and GDPR implementation/training action plan.</li> <li>-Staff training and induction to confirm appropriate management of information.</li> <li>*Info stored / accessed - Building access controls.</li> </ul>										

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
					*SIRO role allocated. *Information Governance Board and ICT Strategy Board in place. *Suite of information policies in place and available on NETconsent policy management system. * SIRO and IT Service Manager attend Government sponsored Warning, Advice and Reporting Point (WARP) and participate in LGA / NCSC run Cyber Security awareness programme * The council has subscribed to NCSC email and web security monitoring tools * SMT, Members and Staff Cyber security awareness training plan in place									
SRR1.9	Ability to respond effectively to unexpected events in support of our communities (e.g. weather/terror attack/phone system failure/other)	4	3	12	*Up-to-date Emergency Response Plan, Flood Plan, Vulnerable People Plan, Pandemic Plan etc. drafted in conjunction with agencies, government departments and other local authorities. *Regular review and updating of Emergency Response Plan and other plans. *Allocated Emergency Team Leaders within the Council e.g. District Emergency Controller and Gold Officer roles. *Business continuity plans in place for each Service. *Bad weather policy and	4	2	8	Review and refresh of all service Business Continuity Plans to ensure up to date and appropriate content	31-Aug-2019	3	2	6	Head of Communities

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner	
					<p>communications.</p> <p>*Climate change strategy supported by Local Resilience Forums.</p> <p>*Emergency Contacts list updated every quarter.</p> <p>*Defined Mutual Aid Agreement including all Gloucestershire local authorities.</p> <p>*Continued testing of Emergency Plan arrangements; bi annual exercises &amp; live events (e.g. Christmas call out exercise); and use of Mutual Aid agreement. With ongoing shared learning.</p>										
RR1.10	Council services loss for a significant period, due to technology failure (leading to other financial, reputational and information governance risks).	4	4	16	<p>*Up to date IT asset register now electronically maintained through Snow.</p> <p>*Appropriate secure physical location of the servers planned enhancement by the end of 2019 through the migration to Azure and Indectron data centre hosting service.</p> <p>*2017 – 2019 ICT Strategy, including budget signed off, which has seen significant investment in improving the resilience of the council's IT infrastructure .</p> <p>*Infrastructure/network topology (mapping) identified a number of areas of high risk, all of which have been</p>	4	2	8	<p>IT internal audit to be completed to support ICT action plan</p> <p>Review and refresh of all service Business Continuity Plans to ensure up to date and appropriate content</p> <p>Achievement of Cyber Essential Plus</p>	31 Mar 2020	3	2	6	Head of Policy & Resources	

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Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner	
					<p>mapped to the ICT Strategy to secure funding to mitigate or remove by the end of 2019</p> <p>*PSN Compliance Certificate achieved. Stage one of Cyber Essential achieved with Cyber Essential Plus plan to be achieved by the end of 2019</p> <p>*ICT Business Continuity Plan is being built around the use of Azure and Indectron data centre which will be in place by the end of 2019. The council's cloud first strategy has seen Microsoft productivity tools, email, security, Intranet and web site hosted externally which help simplify the BC plan. A number of line of business application are also planned to be cloud hosted by the end of 2020</p> <p>*ICT Strategy in place to the end of 2019, with that for a further two years in development.</p> <p>*Information Governance Board and ICT Security Board in place.</p>										
SRR1.11	Inability of the Council to continue to identify viable plans to achieve savings	4	4	16	<p>*Budget setting process – including consultation; management/leadership input into savings targets; and Overview &amp; Scrutiny and Council involvement.</p> <p>*SMT and Cabinet review and approval of Money Plan</p>	4	3	12			4	2	8	Head of Policy & Resources	

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
Page 212					<p>savings delivery options – including commissioning and alternative delivery opportunities for savings and income generation.</p> <p>*Allocation of individual savings/income targets to an SMT sponsor, Cabinet Member and leading manager.</p> <p>*Rigorous monthly monitoring of the Council's financial position - monthly income / budget monitoring at budget holder level (Finance led) and by SMT.</p> <p>*Engagement with GMT to ensure corporate ownership of financial challenges and need for active identification of efficiency &amp; income opportunities for the Council.</p>									
	SRR1.13	Inability of the Council to deliver the Corporate Plan to 2020	4	4	16	<p>*Corporate Plan developed jointly by Cabinet and Senior Management Team, scrutinised and endorsed by the wider Council membership.</p> <p>*Corporate Plan approval completed.</p> <p>*Budget Strategy and Money Plan designed to appropriately resource the delivery of the Corporate Plan.</p> <p>*Performance management framework.</p> <p>*Service planning processes to ensure Corporate Plan link</p>	3	2	6			3	2	6

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
					to Service Plans. *Appraisal processes link personal objectives and development needs to the needs of the organisation, talent development and personal well being.									
SRR1.14	Negative financial implications due to inappropriate delivery and management of the Property Investment Strategy; and a risk of political priorities diluting commercial considerations around hedging	4	4	16	*Property Investment Strategy (including risk management considerations) endorsed by Cabinet and approved by Council. *Property Investment Board set up with a defined Terms of Reference to oversee the investment of the £80m fund. *Council approved delegation of authority to the Council Solicitor to conclude documents (in line with senior officer agreed heads of terms) to enable completion of each acquisition. *Property Investment Board to receive investment prospectus and officer evaluations of potential property acquisitions; to make recommendations to the s151 Officer with regards to investment; and to oversee the due diligence and acquisition process in accordance with the Property Investment Strategy. *Property Investment Board to monitor fund position (including cost of borrowing) and the management of the	4	2	8			4	2	8	Head of Policy & Resources

Risk Ref	Risk	Original Impact	Original Likelihood	Original Score	Description	Current Impact	Current Likelihood	Current Score	Further Mitigating Action	Timescale	Target Impact	Target Likelihood	Target Score	Risk Owner
					estate, with outcomes to be reported to senior officers and Members. *Legal implications ongoing review to ensure relevant local authority powers remain in place to support the Property Investment Strategy.									

## Gloucester City Council - DRAFT Risk Management Action Plan 2019/20

The below proposed actions aim to support the Council in continuing to embed risk management at Gloucester City Council and deliver the requirements of the Risk Management Policy Statement and Strategy. Delivery of the plan will be undertaken by Audit Risk Assurance (ARA).

Area	Action	Deadline/Target
Strategic Risk Register	<p>Facilitation and support of Strategic Risk Register review and update by Senior Management Team (SMT). Formal quarterly updates to occur at SMT.</p> <p>Bi annual reporting of the Strategic Risk Register to Audit and Governance Committee.</p>	<p>Ongoing within 2019/20.</p> <p>July 2019 and March 2020 Committee meetings.</p>
Annual Risk Management Report	Draft the Annual report to Audit and Governance Committee.	March 2020 Committee.
Risk Management Self Assessments	<p>Completion of risk management self assessments against the latest regulatory requirements, best practice guidance, principles and standards.</p> <p>Outcomes/actions to be fed into the updated Risk Management Policy Statement and Strategy and Risk Management Toolkit.</p>	Ongoing within 2019/20.
Risk Management Policy Statement and Strategy	Review and update of the document, considering regulatory requirements, best practice principles, guidance and standards. Final version to be presented to Audit and Governance Committee for approval.	January 2020 Committee.

Area	Action	Deadline/Target
Risk management guidance and support available to staff and Members	Creation of a Risk Management page on the Council's intranet, to include (but not be exclusive to) the up to date Risk Management Policy Statement and Strategy and Risk Management Toolkit.	November 2019.
Risk management support on Council's significant projects	Offer and provision of risk management advice, support and guidance e.g. Together Gloucester, Gloucester Transport Hub, Climate Change Forum, etc.	Ongoing within 2019/20.
Risk management training and awareness sessions programme	Linking with the Council's insurers, Zurich Municipal, to deliver training for: Members; SMT; Gloucester Management Team and Service Managers.	Ongoing within 2019/20.
Service Risk Registers	<p>Provision of guidance and support to service leads to ensure service risk registers are documented for all Council service areas and are updated accordingly.</p> <p>Exercise to be undertaken to confirm that all services have documented up to date service risk registers.</p>	<p>Ongoing within 2019/20.</p> <p>March 2020.</p>
Risk Maturity Model	To ascertain the level of risk maturity within the Council to include a risk maturity self assessment within the Annual Governance Statement assurance statement process. This will enable more focused risk management support to service areas as required.	To be included within the 2019/20 assurance statements.

Area	Action	Deadline/Target
Risk Management responsibilities – the 2 <sup>nd</sup> Line of Defence	<p>ARA risk management work will be based on the 3 Lines of Defence risk assurance model, which includes the key objectives (detailed below) on what risk management roles and responsibilities are:</p> <ul style="list-style-type: none"> <li>• Supporting management policies, defining roles and responsibilities, and setting goals for implementation.</li> <li>• Providing risk management frameworks.</li> <li>• Identifying known and emerging issues.</li> <li>• Identifying shifts in the organisation's implicit risk appetite.</li> <li>• Assisting management in developing processes and controls to manage risks and issues.</li> <li>• Providing guidance and training on risk management processes.</li> <li>• Facilitating and monitoring implementation of effective risk management practices by operational management.</li> <li>• Alerting operational management to emerging issues and changing regulatory and risk scenarios.</li> <li>• Monitoring the adequacy and effectiveness of internal control, accuracy and completeness of reporting, compliance with laws and regulations, and timely remediation of deficiencies.</li> </ul>	Ongoing within 2019/20.

Area	Action	Deadline/Target
	<p>Tasks and targets will be allocated beneath each objective, thus ensuring we are operating in line with this model.</p>	



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# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>11 September 2019</b>
<b>Subject:</b>	<b>Gypsies, Travellers and Travelling Showpeople – Accommodation Need Update</b>		
<b>Report Of:</b>	<b>Cabinet Member for Planning and Housing Strategy</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Adam Gooch – Planning Policy Team Leader</b> <a href="mailto:Adam.Gooch@gloucester.gov.uk">Adam.Gooch@gloucester.gov.uk</a> / 01452 39-6836 <b>David Durden – Strategic Housing Officer</b> <a href="mailto:David.Durden@gloucester.gov.uk">David.Durden@gloucester.gov.uk</a> / 01452 39-6558		
<b>Appendices:</b>	<b>1. Site Assessment Summary</b>		

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 To update Cabinet on the current position in identifying permanent residential sites for Gloucester’s Gypsy, Traveller and Travelling Showpeople communities and transit sites for those travelling through the county.
- 1.2 To seek endorsement from Cabinet with regard to the Council’s current position with regard to permanent Gypsy, Traveller and Travelling Showpeople sites.

### 2.0 Recommendations

- 2.1 Cabinet is asked to **RESOLVE** that:
  - (1) the City Council’s position with regard to permanent site opportunities for the Gypsy, Traveller and Travelling Showpeople community be endorsed; and
  - (2) it be noted that officers have made a formal request under the ‘Duty to Cooperate’ to Gloucestershire district planning authorities seeking assistance in identifying a deliverable site to provide for the needs of Gloucester’s Gypsy, Traveller and Travelling Showpeople community.
  - (3) the ongoing work within the County to review the need for transit sites and temporary tolerated stopping places be noted.

### 3.0 Background and Key Issues

#### ***Need for permanent Gypsy/Traveller pitches and Travelling Showpeople plots***

- 3.1 Local planning authorities are required to assess and plan for the housing needs of all communities residing in their area, including Gypsy, Traveller and Travelling Showpeople communities. National planning policy places a duty upon authorities to have in place a five-year supply of specific ‘deliverable’ sites to provide for identified needs, and specific ‘developable’ sites for years 6 to 10 and 11 to 15, in the same way as is required for ‘bricks and mortar’ housing. This requirement applies to those who meet the Government’s planning definition as set out in ‘Planning Policy for Traveller Sites’ (March 2015).
- 3.2 The Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA) (March 2016) sets out the accommodation needs between 2016 and 2031 for each of the six local authorities in the county. For Gloucester City, it identifies a need for two Gypsy / Traveller pitches and 16 Travelling Showpeople plots, including some need in the next five years. In response to the Government’s revised planning definition of Gypsies, Travellers and Travelling Showpeople (Planning Policy for Traveller Sites 2015), Table 1 below presents the figures by those that meet the definition (travelling households), those that do not (non-travelling households) and those where status is not known.

<b>Gypsies / Travellers</b>	<b>Pitches</b>			<b>Total</b>
	<b>2016 - 2021</b>	<b>2021 - 2026</b>	<b>2026 - 2031</b>	
Travelling households	0	0	0	0
Non-travelling households	1	0	1	2
Not known	0	0	0	0
<b>Total</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>Travelling Showpeople</b>	<b>Plots</b>			<b>Total</b>
	<b>2016 - 2021</b>	<b>2021 - 2026</b>	<b>2026 - 2031</b>	
Travelling households	6	1	1	8
Non-travelling households	0	0	0	0
Not known	2	3	3	8
<b>Total</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>16</b>

**Table 1: Gypsy, Traveller and Travelling Showpeople needs in Gloucester**

#### ***Site opportunities***

- 3.3 Gloucester City has a limited land supply for all forms of development within its administrative area. Over the past few years officers have undertaken several targeted ‘call for sites’, seeking to identify sites to provide for the needs of Gypsy, Traveller and Travelling Showpeople communities.
- 3.4 Through this process, several sites were put forward by the community, that are located within the administrative area of the city. However, the majority had to be ruled out because of the existence of ‘absolute’ constraints that make them unsuitable for residential development, such as location within an area of high flood risk, or within the ‘cordon sanitaire’ (an area around the Netheridge Sewage Treatment Works where development is not appropriate because of odour nuisance). Some were also in third party ownership and not being promoted by the landowner and therefore not available for development; limited land supply within the city means that sites suitable for development will always be able to achieve a higher value for alternative uses for

which there is also a demand in the city, such as bricks and mortar housing, employment or retail.

- 3.5 In terms of land owned by the City Council, the majority are designated for community uses such as public open space, allotments and playing fields. They are not therefore suitable or available for redevelopment.
- 3.6 However a site known as the 'former Town Ham Allotments' has been subject to substantial consideration. It is located adjacent to existing Travelling Showpeople sites off Westend Parade in the north of the City and could provide for an extension. However, it is subject to contamination and unstable land in relation to its previous use as a landfill. There is also a high pressure gas pipe running underground through the site.
- 3.7 With this in mind, officers appointed a consultancy called Hydrock to provide additional expertise to establish whether the site could be developed. This work has been completed and it shows that the extent of the constraints would require substantial engineering work and funding to address them. In addition, the presence of the gas pipe would require the creation of a 'buffer zone' where it would not be possible to develop and would restrict the number of plots that could be accommodated, as well as the layout of the site. It has therefore been concluded that the site is not viable and cannot be taken further.
- 3.8 In relation to Gypsy/Traveller need, a site at Sims Lane in Quedgeley currently has temporary planning consent. An application was submitted for the permanent residential Gypsy site, but this wasn't considered acceptable given its location within the cordon sanitaire. For this reason, planning consent was granted for a limited period of time. This was appealed by the applicant but upheld by the Planning Inspector.
- 3.9 It is worth noting that speculative planning applications would count towards supply and would be deducted from the pitch/plot requirement. However, with the exception of the site at Sims Lane, no planning applications have been received for permanent Gypsy, Traveller or Travelling Showpeople sites.
- 3.10 Having regard to the above, the current position is that despite best efforts, there are currently no deliverable / developable sites to provide for needs within the administrative area of Gloucester City. Officers have investigated all possible site options in the city, undertaken several 'call for sites' and investigated the Council's own land assets. It is necessary therefore to seek support from neighbouring authorities to address these needs under the 'duty to cooperate' and a letter has now been sent to all Gloucestershire district planning authorities, seeking support in identifying sites to provide for need.
- 3.11 A summary of site assessments in relation to those submitted under the 'call for sites' and those in City Council ownership is provided at Appendix 1.

### ***Transit sites***

- 3.12 Transit sites are for members of the community who are travelling through the area as opposed to those who have a need for a permanent residential pitch. The 2016 GTAA recommended that, except for a specific community needs in the Forest of

Dean, there wasn't a need for formal transit sites within the County. Instead, the authorities should consider 'temporary tolerated stopping places', whereby an area or areas of land are identified for members of the community to reside for a short period of time before moving on. In some cases, the local authority will provide basic services such as bins or toilets. This is a more positive approach and helps to create better relationships between the settled and traveller communities.

- 3.13 To date, 15 transit pitches have been granted planning consent in the Forest of Dean as recommendation in the GTAA recommendation. In addition, eight pitches have been granted consent in Tewkesbury Borough. Both sites are in private ownership and anyone wishing to reside on them would need permission of the landowner. The City Council is also currently assessing a planning application for four transit pitches and one permanent pitch (for an on-site caretaker) at Severnside Farm in the north of the City.
- 3.14 The GTAA noted that the Government's change the planning definition of Gypsies, Travellers and Travelling Showpeople (based on propensity to travel) could encourage more travel within the community in order to maintain that status. With this in mind, it recommends that the Gloucestershire districts should review whether there is an increased need for formal transit pitches as a result.
- 3.15 Work to take this forward the consideration of temporary tolerated stopping places and a review of transit site needs is currently being taken forward through a county-wide group.

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

- 4.1 Not applicable. This report considers the City Council's statutory duty with regard to land-use planning.

#### **5.0 Alternative Options Considered**

- 5.1 Officers have considered all site options to provide for the accommodation needs of its Gypsy, Traveller and Travelling Showpeople communities. None can be found at this time.

#### **6.0 Reasons for Recommendations**

- 6.1 The City Council has a duty to assess and plan for the housing needs of all of the communities residing in their area, including Gypsy, Traveller and Travelling Showpeople communities. It is not possible for the Council to identify sites within its own administrative area and it will therefore be necessary to seek support from neighbouring authorities, under the 'duty-to-cooperate'.

#### **7.0 Future Work and Conclusions**

- 7.1 Requests have been made under the 'duty to cooperate' for support from neighbouring authorities in identifying sites to provide for Gloucester's needs.

## **8.0 Financial Implications**

- 8.0 None at this stage. However, if sites opportunities can be identified in other local authority areas, the City Council would need to financially support the required evidence to underpin the allocation.

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

## **9.0 Legal Implications**

- 9.1 Legislation requires local authorities to assess the need for different communities residing in their area and to place in place a strategy to address them. Where there are strategic cross-boundary planning issues whereby a local authority can demonstrate development needs cannot be accommodated within its area, the duty to cooperate requires authorities to work positively in order to try and address these.

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

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

- 10.1 Not having a five year housing supply for Gypsy, Traveller and Travelling Showpeople needs means there is a risk that speculative applications may come forward in locations the authority finds undesirable. The lack of a five year supply would be a material consideration in the determination of the application. That said, the limited land supply in the city means this risk is low.
- 10.2 There is also the risk that a lack of sites to provide for needs limits housing options for the community, which could lead to overcrowding on existing sites or members of the community moving elsewhere.
- 10.3 If future need should be identified, a lack of transit sites and/or temporary tolerated stopping places could increase the number of unauthorised encampments in the city/county, resulting in additional costs through enforcement.
- 10.4 However, the authority is taking positive action under the duty to cooperate and by working in partnership with neighbouring authorities to address these issues.

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

- 11.1 A PIA screening has been undertaken and is concludes that overall the content of the report will likely have a positive impact for the Gypsy, Traveller and Travelling Showpeople in that positive steps are being taken to address the need for permanent and transit sites through the duty to cooperate.

## **12.0 Other Corporate Implications**

### Community Safety

- 12.1 None

Sustainability

12.2 None

Staffing & Trade Union

12.3 None

**Background Documents:** None

## Appendix 1

### Planning definition of 'deliverable' and 'developable'

The planning definitions, set out in 'Planning Policy for Traveller Sites' (August 2015), footnote 4 and 5, are:

4. To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

5. To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged

### Site Assessment Summary

	<b>Suitable</b>	<b>Available</b>	<b>Viable</b>
Former Town Ham Allotments	No – investigatory work undertaken by the City Council confirms significant constraints that affect the suitability of the site. The most significant of these is the presence of a high-pressure oil pipe, which introduces a development exclusion area. The site is also subject to significant contamination as a former landfill.	Whilst the City Council as landowner would make the site available if it was suitable, it cannot be accessed by large vehicles via the existing track. Other forms of access are ransomed via third party ownerships.	No – the extent of constraints and limited developable area mean redevelopment of the site is not viable.
40 Sims Lane	No – site located within the 'cordon sanitaire' around Netheridge Sewage Treatment Works.	Yes	Yes
Port Ham Sidings	No – site located within floodzone 3.	No	N/A
Land at Hempsted Meadows	No – site located within the 'cordon sanitaire' around Netheridge Sewage Treatment Works.	No	N/A
Land off Naas Lane	N/A – the site is operating as a car storage facility.	No	N/A
Land rear of St Oswalds Retail Park	Yes – the site provides a suitable location for residential development.	No. Whilst the City Council owns the freehold, a significant proportion of the site is subject to	No. The land is subject to significant constraints in the form of contamination and a leachate

		a third-party leasehold, and other an option for alternative forms of development.	drain. The redevelopment of the site requires higher value uses in order to be viable. In addition, land assembly costs are substantial.
Land adjacent to Hempsted Recycling Centre	No – located directly adjacent to the landfill.	No	N/A
Land adjacent to Netheridge Sewage Treatment Works	No – site located within the 'cordon sanitaire' around Netheridge Sewage Treatment Works.	No	N/A
Land adjacent to Riverside Health and Fitness Club	No – the site is designated public open space and located in floodzone 3.	No	N/A
Land South of A417 (Over Causeway)	No – the site is located in floodzone 3.	No	N/A

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