

Appendix 2 – Response Report

Please note: Respondent's comments have been added verbatim

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

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

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

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

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

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

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

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

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

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



promote the benefits of trees within the built environment. A South West TDAG is currently being set up, led by Exeter City Council. TDAG has produced guidance - 'No Trees, No Future'(Trees and Design Action Group, 2010) - which is aimed at designers, developers and planners to encourage integrated, joined up thinking, strategies, policies and implementation relating to trees in the urban realm. In London, Policy 7.21 of the draft Replacement London Plan advises Boroughs to take the emerging work of the Trees and Design Action Group into account in producing LDF policies and determining planning applications. We recommend that Gloucester City Council considers this guidance in developing its City Plan. We also consider that the City Council has a statutory duty to promote tree planting. Section 197 of the Planning Act (1990) states: 197. Planning permission to include appropriate provision for preservation and planting of trees. It shall be the duty of the local planning authority - 2 (a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees; Further comments are - - The Woodland Trust believes that tree planting, even in constricted urban areas, is especially important because of the unique ability of woodland to deliver across a wide range of benefits - see our publication Woodland Creation- why it matters <http://www.woodlandtrust.org.uk/EN/ABOUT-US/PUBLICATIONS/Pages/ours.aspx>. These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and aesthetic public realm benefits), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling, green infrastructure) and for the local economy (timber, wood fuel and 'fruiting' markets).- The Natural Environment White Paper states in para 2.54: 'We want to create more opportunities for planting productive and native woodlands; more trees in our towns, cities and villages..' - In a letter to all Local Authorities calling for support for the Government's National Tree Planting Campaign ('The Big Tree Plant'), the Environment Minister Caroline Spelman has extolled the many virtues of trees: 'Trees offer so many benefits to our citizens. They capture carbon and hold soils together, prevent flooding and help control our climate. They also add immeasurably to our quality of life by making areas more attractive and healthier places to live. In recent years the number of trees being planted annually across the country has declined, and could decrease further, unless action is taken to reverse this trend' (letter to all Local Authorities, 12th November 2010).- An important publication from the Forestry Commission, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), sets out 'The multiple value of trees for people and places - increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial', and lists (on p.10) the benefits as - Climate change contributions - Environment advantages - Economic dividends - Social benefits.

We would therefore like to see tree planting supported as a key component of improving the City's quality of life in the City Plan. 2. We are pleased to see Key Development Principle no.11 promote the important role that the natural environment can play in climate change mitigation and adaptation strategies. There are a number of ways in which trees offer a particular and cost effective answer to adaptation: - Urban heat island: Trees and woods can reduce the impact of the 'urban heat island'; which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. Dramatic summer temperature differences of as much as 10&#176;C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4&#176;C. 3 (Handley, J and Carter, J (2006) Adaptation strategies for climate change in the urban environment, Draft final report to the National Steering Group, Centre for urban and regional ecology, University of Manchester <a href="http://www.sed.manchester.ac.uk/research/cure/downloads/asccue\_final\_report\_national\_steering\_group">www.sed.manchester.ac.uk/research/cure/downloads/asccue\_final\_report\_national\_steering\_group</a>.pdf). - Air quality: Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources - such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). - Water management - flooding: Throughout the UK winter is predicted to be wetter and summers drier and there is also a predicted increase in the frequency of very heavy rainfall. Trees can reduce the likelihood of surface water flooding, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (Using green infrastructure to alleviate flood risk, Sustainable Cities - [www.sustainablecities.org.uk/water/surface-water/using-gi/](http://www.sustainablecities.org.uk/water/surface-water/using-gi/)). We would like to see tree planting promoted in the Gloucester City Plan for climate change mitigation benefits. 3. Finally, we are pleased to see Key Development Principle no.12 promote the important link between improved health and accessible green space like woodland. The Public Health white paper

range of policies supporting the natural environment and biodiversity in the city.

<p>(Healthy Lives, Healthy People; Nov 2010) states that: "Access to green spaces is associated with better mental and physical health across socioeconomic groups." and that "Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities." The Case for Trees: Forestry Commission (2010) sets out: 'The multiple value of trees for people and places - increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial;', and lists those benefits (on p.10) as -; - Climate change contributions - Environment advantages - Economic dividends - Social benefits.</p> <p>The Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that can be addressed by green infrastructure provision in urban design. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure. The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends: 4 - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. Applying this standard to Gloucester City, with comparisons against other nearby Councils and the SW region, gives the following figures (see table below). It indicates that Gloucester shows below average woodland accessibility compared to the South West as a whole in the smaller wood size category. This presents an excellent opportunity for improving small scale accessible woodland through new tree planting for health and wellbeing benefits in Gloucester. This revised data used can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form. Accessibility to Woodland in Gloucester using the Woodland Trust Woodland Access Standard</p> <table border="1"> <thead> <tr> <th></th> <th>Glos City Council</th> <th>Bristol City</th> <th>Tewkesbury</th> <th>All SW</th> </tr> </thead> <tbody> <tr> <td>Accessible woods % population with access to 2ha+ wood within 500m</td> <td>5.0%</td> <td>13.9%</td> <td>3.1%</td> <td>12.8%</td> </tr> <tr> <td>% population with access to 20ha+ wood within 4km</td> <td>87.7%</td> <td>90.4%</td> <td>35.4%</td> <td>67.4%</td> </tr> </tbody> </table> <p>The research report containing this data, 'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. The full 'Space for People' report can be found at <a href="http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx">http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx</a>. In addition, the UK is one of the least wooded areas of Europe, with just 11.8% woodland cover compared to around 44% for Europe as a whole. The Woodland Trust is therefore working &gt;to achieve its ambitious aim of doubling native woodland cover over the next 50 years. We would like to see an increase in accessible urban tree planting supported in the City Plan in order to deliver health &amp; wellbeing benefits for Gloucester.</p>		Glos City Council	Bristol City	Tewkesbury	All SW	Accessible woods % population with access to 2ha+ wood within 500m	5.0%	13.9%	3.1%	12.8%	% population with access to 20ha+ wood within 4km	87.7%	90.4%	35.4%	67.4%	
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% population with access to 20ha+ wood within 4km	87.7%	90.4%	35.4%	67.4%												
<p>The statement in the final sentence of Key Development Principle 3 (city centre first approach) should in Royal Mail's view either be removed or toned down so that a balance can be achieved with focus on the regeneration of the city centre without detrimental effect on the wider Gloucester City Council area. As alluded to in section 3 above, in Royal Mail's view there should be a separate Key Development Principle that takes a "whole economy" approach to employment development and builds in greater flexibility for employment generating non-B class uses to be development on employment sites in line with the findings of the 2011 Nathaniel Lichfield employment land study and recent Government guidance within the NPPF.</p> <p>Royal Mail also encourages the City Council to consider including a further Key Development principle that promotes the benefits of mixed use development with commercial and residential development taking place alongside each other. This is required for consistency with the ninth core planning principle of NPPF Paragraph 17</p>	<p>Noted.</p> <p>It is important that the city centre first principle for retail development continues to be applied in order to protect the city centre from unacceptable vacancy and underinvestment issues. However this should be done without stifling leisure and commercial investment that could reasonably take place outside of the city centre that would not harm the vitality and viability of the city centre and its retail offer in particular.</p>															
<p>As general objectives, we have no objection to the key development principles. some reference could be made to working with landowners and developers to stimulate and proactively bring forward vacant and redundant sites for development. References are made within the listed principles to a level of housing growth and it is understood that such levels of growth are being addressed through the Joint Core Strategy.</p>	<p>Noted.</p> <p>The policies of the City Plan are intended to provide flexibility that</p>															

	allows for development to proceed where possible.
CPRE fully supports the Key Development Principles, in particular continuing the long standing City Centre first approach, making the most efficient use of previously developed land and reducing the need for greenfield development: the proposed Kings Quarter redevelopment offers particular opportunities for revitalising the City. In relation to Principle 8 and Principle 11, we have advocated (above) that a Green Infrastructure Strategy is prepared as part of the Plan. This would ensure a focussed approach to conserving and enhancing landscape and biodiversity assets and improving open space and recreation provision. It should also address the need for enhanced opportunities for walking and cycling and access to the countryside surrounding the City.	Noted.  The strategy for the JCS and the City Plan adopts an approach of maximising urban capacity and the use of brownfield land before having to seek greenfield sites or areas located in the Green belt for development.  A Green Infrastructure Strategy has been produced as part of the JCS process. The City Plan will carry the strategy forward.
Referring to 'Key Development Principles to Deliver the Strategy' (paragraph 8) I note that the concept of 'environmental assets' is introduced which doesn't appear in the paragraphs covering protection of the natural environment or built heritage. It would be useful to introduce this phrase earlier as suggested above. Ironically, para. 8 does not mention the 'natural environment' which the previous paragraphs do. Para 8 should include the phrase to establish a consistency of approach. As it stands it only includes certain categories for improvement or protection and misses others e.g. agricultural land and woodland. Am I mistaken or did I miss the reference to leisure and sport in the earlier paragraphs? If there is no reference then I would suggest that these important community issues, which should include provision of other community facilities, health services etc. should be included. With the level of development envisaged, it will be absolutely vital for such facilities to be supported and enhanced if the City residents are to enjoy a better quality of life. I would suggest amendments so paragraph 8 reads: "8. To deliver a City to enjoy by protecting and improving the City's environmental assets, leisure and recreation opportunities. The City's built heritage and natural environment, including areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved and protected, particularly Alney Island, the setting of Robinswood Hill and areas of urban fringe. The wide range of leisure and sporting opportunities that the City already enjoys will be supported....."	Noted.  The natural environment of Gloucester and its important open spaces are of vital importance to the city and those that are considered worthy of protected status are (or will be) protected in the final City Plan and its supporting proposals and allocations map.  Additional community, health, sporting and recreation facilities will generally be supported in principle at appropriate locations in the city.
Yes + using the same idea as Tesco sponsoring local retail: ~make a city centre presence a condition of opening outside the centre in, eg Docks, retail parks. ~co-operate with manufacturers to consider the same sponsorship, maybe setting up outsourced admin functions in city centre empty offices - could include apprenticeship. ~city centre collection points for online purchases (agencies).	It would be unreasonable and beyond the regulations of the planning system to insist upon a condition of this nature.
We are broadly in agreement with the 13 Key Development Principles identified by the Part 1 consultation document. Key Development Principle Number 5 identifies the provision of 325 new dwellings in the City every year with additional homes to be provided through well integrated urban extensions on the City's edge. It is noted that this 'Key Development Principle' should be updated should be updated in line with the emerging JCS housing target, once finalised. This has the potential to alter the level of growth required at Gloucester and potentially the development strategy to be adopted. Accordingly, we wish to reserve the opportunity to comment further on this development strategy at the appropriate stages since the level of growth required will directly influence the number and nature of sites that will be required to come forward for development.	The City Plan seeks to maximise the spare capacity of land within Gloucester whilst seeking an acceptable approach to design and sustainability in all specific cases of development.
Whilst we welcome the 'Development Principles' that have been set out, we consider greater focus should be made on the environment to ensure the resultant Plan is truly sustainable. We believe the following themes should be included (or given greater emphasis) within the 'Development Principles' when taking the Plan forward: Flood Risk Flood risk is a key constraint and its consideration should be a prominent 'development principle' for the City Plan. We do not consider its relative importance is reflected in the consultation document. We have provided much guidance in this respect for the emerging Joint	Noted.  We believe that these environmental issues including flood risk, sustainable

Core Strategy (JCS) and this advice remains pertinent for this consultation. We append our consultation letter which responded to the latest JCS public consultation exercise (appendix A). Sustainable Drainage Systems (SuDS) The incorporation of SuDS should be a key 'development principle'. The SuDS approach can play a key role in delivering water quality improvements and Water Framework Directive (WFD) objectives. It involves using a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds, wetlands and green roofs to reduce flood risk by attenuating the rate and quantity of surface water run-off from a site. This approach not only provides betterment in terms of flood risk but should also offer other benefits in terms of promoting groundwater recharge, water quality and biodiversity benefits. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. SuDS seek to mimic natural drainage systems and retain water on or near to the site, when rain falls, in contrast to traditional drainage approaches, which tend to pipe water off site as quickly as possible. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by reducing the quantity of surface water run-off from a site and the speed at which it reaches water courses, promoting groundwater recharge, and improving water quality and amenity. The range of SuDS techniques available means that a SuDS approach in some form will be applicable to all developments. Provision for long-term maintenance should be provided as part of any SuDS scheme submitted to LPA. Model legal agreements that provide a mechanism for SuDS maintenance can be accessed on the CIRIA web site at <http://www.ciria.org/suds/icop.htm>. Climate Change We welcome climate changes inclusion within principle 11. However, we would take this opportunity to stress how important a principle tackling climate change is. It is a principle that should permeate throughout the policy base. The Plan should seek to reduce dependency on fossil fuels, reduce carbon emissions, secure sustainable construction methods, aim for highest standards possible and embed resilience and adaptation to climate change. We would advocate retrofitting existing buildings with energy efficient measures. (As examples, the Forest of Dean Core Strategy has included such a policy and Uttlesford District Council have a policy in their local plan for retrofitting when undertaking house extensions). Land Contamination Given Gloucester's industrial heritage, the importance of remediating historic contamination through regeneration should be a key 'development principle'. This important principle is currently absent from the consultation document. From a groundwater perspective, we consider the Plan needs to promote the protection of groundwater resources and re-development of Brownfield sites (contaminated land). We have produced a Groundwater Protection Policy (also known as GP3), for managing and protecting groundwater, setting out practices to prevent or mitigate impacts on groundwater. For further information: <http://www.environment-agency.gov.uk/research/library/publications/40741.aspx> <http://www.environment-agency.gov.uk/research/library/publications/40741> We need to manage and protect our groundwater resources from pollution if we are to continue to have sustainable supplies in the future. We also want to protect aquatic environments and ecosystems that depend on groundwater. Groundwater is important. It supplies local private water supply abstractors and river base-flows to local rivers within the joint strategy area, but pollution and demands for water puts the resource under increasing pressure. Groundwater also has many benefits, including to: society - by providing water that needs little treatment before it can be drunk the economy - groundwater reserves are worth an estimated £8 billion (England & Wales) the environment - all rivers are partly fed by groundwater. Some rivers and wetlands are completely dependent on it. The approach of GP3 utilises two main tools: 1. Resource Protection involving aquifer classification and mapping of water resources into Principal, Secondary A & B and unproductive strata. (Read more about our aquifer classifications here: <http://www.environment-agency.gov.uk/homeandleisure/117020.aspx> <http://www.environment-agency.gov.uk/homeandleisure/117020.aspx> 2. Source Protection which defines groundwater Source Protection Zones (SPZs) around those catchments to public water supply boreholes and certain other private supply boreholes. Please note: There are many other licensed and unlicensed abstractions supporting industrial, agricultural, domestic and other uses, which are of local consideration within the joint core strategy area which will not necessarily have a specific SPZ catchment designated. Those sources without a designated SPZ have a 50m Zone 1 protection zone applied for groundwater protection purposes. (Read more about SPZs here: <http://www.environment-agency.gov.uk/homeandleisure/37833.aspx> <http://www.environment-agency.gov.uk/homeandleisure/37833.aspx> ) Biodiversity We welcome the commitment in 'development principle' 8 to protect and improve environmental assets. However, we believe the importance of enhancing the areas habitats warrants a stand alone 'development principle'. This would serve to amplify its importance within the Plan as it is taken forward. Water Framework Directive It should be an objective of the City Plan to contribute towards the aims of the Water Framework Directive (WFD). The WFD aims to prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters. Planning authorities have a duty under the WFD to take account of the River Basin Management Plans (RBMPs) and can help deliver WFD objectives. Planning policies and activities can ensure that new development does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. Failure to comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK. Local Authorities have a responsibility not to compromise the

development, SUDS, biodiversity and ground water protection are now fully embedded within the City Plan document and the accompanying Sustainability Appraisal.

Severn Trent has been consulted at every stage of the plan making process and are consulted on major planning application.

<p>achievement of UK compliance with EU Directives. Foul Drainage Infrastructure Development should be supported by adequate and timely sewerage infrastructure to protect water quality and prevent foul flooding. Adequate foul drainage provision is therefore a key 'development principle. If there is inadequate capacity, development could put pressure on the sewerage system leading to more frequent discharges of sewage to rivers and could compromise WFD objectives. Planning Policy should require that sewerage capacity be fully investigated and any required improvements made in a timely manner to support development. There should be no unplanned increases of sewage discharges from existing storm overflows and no new storm overflows as a result of new development. We would expect that foul drainage from any development will discharge to the public sewer. The capacity of the sewer system will need to be confirmed with Severn Trent Water Ltd. The ability of the sewage works to cope with increased flows and potentially improved treatment standards will need to be discussed with the water company and ourselves. Any development will need to check if the sewerage system has any storm water overflows on the system. Any increase in capacity within the sewer may cause these to overflow more often and this situation would be objected to by us.</p>	
<p>Crest broadly supports the majority of the key development principles identified as being sufficiently robust to deliver the City Plan's vision. Development Principle 13 is particularly relevant to our comments above in respect of increasing connectivity and accessibility between new neighbourhoods along the A38 corridor and the City Centre. This principle seeks to deliver a 'connected City' however this holistic approach to improving connections within and through the City has not been translated into the Plan's strategy. This inconsistency between the strategy and Development Principle 13 needs to be resolved and the strategy amended accordingly. As briefly discussed in relation to Question 4 above, the City Plan's proposed 'City Centre first approach' needs further clarification to ensure that it does not apply to all development as currently suggested in Development Principle 3. Having regard to the previous comments, the key development principles should seek to focus on challenges and solutions within the City as opposed to focusing on issues in other local authority areas that shall be addressed in other plans. Accordingly it is submitted that Development Principle 5 be amended to remove reference to the delivery of urban extensions on the City's edge; it is not the function of the City Plan to allocate land outside of its administrative boundary for development and therefore it is pre-empting the Joint Core Strategy.</p>	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also need to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
<p>I think that development at the north of Gloucester is probably the best option. As a Quedgeley resident we have seen some disastrous development at Hunts Grove and Kingsway and people feel put upon. Our facilities such as doctors have deteriorated and it is very difficult to get appointments. The roads at Kingsway are tight and difficult to manoeuvre around and the quality of the development seems poor at the moment. I don't know if what else is planned for this area, but some landscaping and tree planting would help.</p>	<p>Noted.</p> <p>The City Plan will contain a number of policies that will help to secure good layout and design. In addition to this there will be facilitative policies around the provision of health care and community facilities should providers come forward wishing to develop these uses.</p>
<p>Key Development Principle deals with encouraging inward and indigenous investment. We are concerned that an over-supply of business and industrial units will create a desert of empty industrial units - which would be most off-putting to potential investors in Gloucester, and create a poor image for the City going forward. By way of background, we own industrial units 10-16 Brunel Court, off Stevenson Drive, Waterwells Business Park, Gloucester, as commercial investment properties. Our comments particularly relate to land east of Waterwells Business Park, but they are also relevant to other areas earmarked for employment use. In our experience there is currently an over-supply of employment land in this part of Gloucester. This is unlikely to change in the next few years. For your information, we bought the Waterwells units in 2004 and 2005. They have only been fully let for less than 8 months since then. At the moment several of the units are empty and we have had great difficulty trying to find new tenants, despite offering very considerable incentives. Quite simply, the current demand is very low. We are concerned about the impact of further development on existing land owners, and the overall economy of Gloucester.</p>	<p>Noted.</p> <p>Further work on employment land matters has been commissioned and will form part of the evidence base to inform the final policy position within the City Plan.</p>

<p>We are certainly not against the development, but we are concerned that if too much development takes place, it will have a negative impact. Unfortunately parts of Waterwells are becoming a bit of a desert already. Put simply, the creation of industrial units does not guarantee their take-up, and may have the contrary impact. Instead, we are strongly of the view that any development should be phased, as and when the need arises. This would avoid the depressing sight of empty units, and would be in the long-term interest of the City as a successful destination for inward and indigenous investment. In addition, there is a need to plan to avoid too much strain on local highways. There are already areas of congestion, for example at the entrance to junction 12 on the M5 and on the A38 towards the City. By way of background, we also own commercial properties in Cheltenham, Tewkesbury, Cirencester and Evesham. We do not suffer to such a degree from such over-supply in these other locations.</p>	
<p>On behalf of our client, we provide comments on the individual principles below:- Principle 1 - Aviva Investors support the reference to ensuring development contributes to transforming the City which brings regeneration benefits and makes the most efficient use of previously developed land and buildings. Specifically in relation to city-centres, opportunities whereby previously developed land can be used efficiently, for a mixture of uses will contribute to the vitality and viability of the centre, should be encouraged. Principle 3 - Our client strongly supports this principle and the identified 'primacy of Kings Quarter redevelopment' however we require that specific reference is inserted at the end of this statement which explicitly states that development will not be supported where it will also have an adverse or negative impact upon planned or committed investment. Currently this statement makes no reference to investment specifically and an amendment to this statement will help to ensure this Document more closely resembles the provisions set out in paragraph 26 of the NPPF. Principle 4 - Our client supports the identified primacy and function of the City Centre however we wish to re-highlight the heightened need to improve the health and prosperity of the City Centre specifically. Evidence published recently highlights that the comparison retail offer of Gloucester city centre is limited for a city of its size and is considered a weakness of the overall retail offer (see paragraph 6.7 of the DPDS critique). The pertinence of this issue is also highlighted by the City Centre's observed reduction in market share in comparison goods, which has decreased by 12% between 2001 and 2011. Therefore our client requires this principle to be amended slightly to more fully recognise the importance of addressing this evidence so as to bolster the 'city centre first and foremost' policy. Principle 5 - Our client supports the reference to housing growth and affordable housing provision; however this principle should also reference the need to consider viability. This reflects the approach set out in national planning policy - see NPPF paragraph 173 which states "pursuing sustainable development requires careful attention to viability and costs in plan making and decision-taking". Principle 6 - Aviva Investors support the provisions of this principle and the aim to deliver a City that encourages and facilitates inward and indigenous investment. However this principle should be expanded slightly to reference the national planning policy requirement which provides for the protection of existing, planned or committed investment in a centre against significant adverse impacts in accordance with (paragraph 27 of the NPPF).</p>	<p>Noted.</p> <p>The work of the Regeneration Strategy addresses the Council's regeneration priorities.</p> <p>The City Plan seeks to protect the city centre and is fully compliant with with the NPPF.</p> <p>Further work on retail will be undertaken as part of the JCS process.</p>
<p>As regards the key development principles: We endorse the statement that "development will not be supported where it will have a demonstrable negative impact on the City Centre and its regeneration" - we only trust that the decision makers will have the courage to take up this challenge; - In delivering sustainable communities we hope that greater emphasis will be applied regarding City Centre living and that future opportunities for City Centre development include a strong steer for the inclusion of homes. This would also apply to greater drive towards developing a clear 'living above the shop' policy; - The emphasis on 'high quality and skilled jobs for the local population' has long been championed by CCCP. However the drive towards extensive retail &amp; leisure provision can only mean that the majority of new jobs created will be part time, low paid. Therefore whilst jobs are welcome of course we really do need to ensure we give stronger planning emphasis to employment opportunities and developments which include 'high quality .... jobs' No further comment as regards this part of the City Plan as the key development principles outlined do in many aspects reflect the recently produced City Vision which we fully endorse.</p>	<p>Noted.</p> <p>The City Council is committed to the regeneration of the City Centre. The inclusion of housing within the centre is a key component of achieving a sustainable regeneration that will add vitality and activity.</p> <p>Further work will be undertaken in the form of an economic strategy.</p> <p>More consideration will be given to need to retain or attract 'high quality and skilled jobs'.</p> <p>The City Plan will contain a policy that protects quality employment land.</p>

Comment Received to Question 4: Do you have any further comments to make?	Key points and Officer Response
<p>I have just read the City Plan, paying special attention to future plans for sporting activities in the city. Once again it is rhetoric without backing it up with actions, and as a past member of Gloucester Civil Service CC, and having suffered the trauma of ground moves twice recently until we were finally shut down through a lack of ground facilities in the city, I am appalled by what the future holds for sport in Gloucester, if there is any at all? The sections below are pasted from the City Plan, and if they were true I would rest a bit better, but as this won't happen it just seems a waste of time supporting anything in this city, which is rapidly moving downhill.....no wonder we are the laughing stock of surrounding towns and cities!! 2 Valuable heritage, areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved The wide range of leisure and sporting opportunities that the City already enjoys will be supported To improve the health of Gloucester's residents by improving access to informal and formal green spaces thereby providing opportunities for people to pursue healthy activities and lifestyles.</p>	<p>Noted.</p> <p>The City Plan will provide policies that help to improve facilities for sport and recreation in the city, as well as enhancing and protecting heritage assets and the natural environment.</p>
<p>It would be useful to number the pages and paragraphs for ease of reference.</p>	<p>Noted.</p>
<p>The vision expressed does not provide a sense of place and does not set out a clear vision of how the city will change over the next 20 years. The wording could apply to most cities in the UK! It would be helpful if this vision were to take on board the 'place making' agenda and set out how the city and its various parts are envisaged to change over the plan period. The role of Gloucester in its wider settings is important and an understanding of the city's relationship with neighbouring areas, including Stroud, would inform its development.. Whilst this aspect may be addressed to some extent within the JCS, Stroud is not party to that. The City Plan is an appropriate medium for setting out the Gloucester City view of that relationship and how the two areas 'work' together.</p>	<p>Noted. These are important issues and Gloucester city will continue its duty to cooperate with Stroud with regard to cross boundary growth issues. The city plan does need to be read alongside the JCs in this regard as the JCS in particular addresses these cross boundary and south of Gloucester issues. The City Plan will also address this issue more fully as it progresses.</p>
<p>Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Royal Mail is a universal service provider under the Postal Services Act 2000. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a sister company to Royal Mail) operates the national network of post offices and sub post offices. The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly. Royal Mail will be making representations at the further consultation stages of the City Plan and wishes to have a continuing dialogue with Gloucester City Council and about its requirements in Gloucester.</p>	<p>Noted.</p>
<p>The plan needs to focus on delivery and ensure that policies and allocations are flexible enough to stimulate delivery, particularly in current challenging economic circumstances and early years of the plan. References are made to the potential for an Infrastructure Plan and an early draft of such a document will ensure a clear understanding of delivery issues.</p>	<p>Noted.</p> <p>The policies of the City Plan are intended to provide flexibility that allows for development to proceed where possible.</p> <p>An Infrastructure Delivery Plan for</p>

	Gloucester will be prepared as part of the City Plan evidence base.
Improvement of the bus station is essential but it needs to be linked to a more pedestrian friendly access between the it and the railway station. At present people transferring from train to bus or vice-versa have to cross Bruton Way with its slow-acting pedestrian lights. Yet a number of bus routes, eg Stagecoach 1,4,7,9,91,93 actually pass in front of the railway station without stopping. Either there should be a new footbridge from the rail to the bus station or buses should stop nearer to the railway station. Sometimes it is quicker to walk (or rather run) from the railway station to the ASDA bus stop instead of trying to cross Bruton Way but this involves crossing Metz Way (where the lights are also slow to change for pedestrians) and having to stand in a two-way cycle lane in order to board the bus. It would be better not to have cycle lanes on pavements because speeding cyclists are a hazard to pedestrians.	Noted.  The planned improvements to the bus station, rail station and the Kings Quarter regeneration scheme will bring significant improvements for pedestrians in this area of the city generally.
This document would be much easier to comment on if the paragraphs had been numbered	Noted
To Tesco and manufacturers (being new here, I don't know any local large manufacturers) add the big banks. Have you involved them with the city's plans?	Everyone has the potential to be involved in the City Plan consultation which is widely advertised and consulted on, including the major supermarkets, local manufacturers and other local organisations.
<p>firstly, to plan for the future, it only right that you should look at the past briefly, there have been frankly quite a few monumental disasters, in this city regarding planning, the city centre wasn't rebuilt because of ww2 bombing, most of the city centre was ripped apart by the Jellicoe plan of 1960, which very sadly followed the country wide, concrete &gt;jungles, such as the bull ring[Birmingham] and Milton Keynes[there are countless others schemes around the uk]huge swathes of Gloucester's ancient buildings, streets were wiped off the face of the planet, has anything been learned locally, no not at all, amazingly its still going on, the last twenty or so years its got worse, the docks, with no thought whatsoever, about the long term future of transport, when fuel runs out, which it will, that's a well known fact, the canals/railways will comeback into there own, also very important, to remember that the global economy, will NOT last, why A, the standard of living[wages] in the emerging economies, will rise to our levels eventually, so there will be no profit producing things on the other side of the world. B - as I've said above fuel will run out, so on the logistics side alone, the uk will eventually become more reliant on home grown produced products, have you once thought about this, clearly not in recent times, because the docks/monk meadow, have been developed, in all for limited development yes, but if ever the docks were needed again for there original purpose, a docks, I fear its been and is being over developed, same can be said regarding the railway triangle. PLANNING - buildings developments etc now this is something, that has been totally ignored, and no thought has gone into this for decades, developers, planners etc have been aloud to build shops, flats etc,that have no respect at all for the local surroundings, history of the area at all none look at the flats/carpark in the barge arm of the docks as one example, hideous, they look like nothing from the historical past at all, if in future there are new buildings or ones that are going to be refurbished in the centre, please at least give them old style frontages, to make the main streets more historic looking, even persuade future developers to even purchase old building from elsewhere, like they have at the black country museum, beamish, which brings in masses of tourist, GATE STREETS SHOPPING[RETAIL]PARKING firstly the gate streets needs shops, to bring people into the city and spend money, perfectly simple to understand, convenience to those shop is key, so why were the gate streets totally closed off to traffic, when the gate streets were open to traffic, footfall into the then shops was much higher, why you ask, well it not just the obvious answer, more cars, its because people walked on the pavements next to the shops ,I'm not saying open the gate streets all the time I'm suggesting, open them at certain times just as an experiment. PARKING - parking meters rake in the money, for those who want to shop at the moment. BUT, but getting rid of the meters, that would transform footfall into the city, thus, more people, into the shops, more profit, higher council tax[but not to high as to put retailers off, there is a balance] SHOPPING as we know the retail bubble has burst, sadly I fear the quays development, was a fatal mistake, firstly it was built in the wrong place frankly, I understand the quays/dock city centre connection, but it hasn't worked out like that, yet again the building itself is totally out of kilter with the historical docks, frankly it looks like a 1970s hospital building, from the south, and again takes people out of town. CONCLUSION - I do hope you read this, these are not the</p>	<p>The various comments are noted.</p> <p>The City Plan has the policies and evidence base support that is required to seek good quality development and good design in development for the city.</p>



<p>same old tired views of ,oh well lets follow everybody else, retail this retail that, those days are gone, out of town shopping developments are good for the suburbs, but not near or next to the city centre they take people away, the railway triangle should be developed, with future manufacturing in mind due to its connections to the railway, same for a docks we have docks but nowhere to dock, all future buildings and present ones[when refurbishment permits] must look historical in the gate streets, this has been totally overlooked by planners new and old, fuel will not run out in the time frame of 30 years but when it does, we would be leading the way as far as planning is concerned, and be prepared when it does</p>	
<p>Part 1 of the City Plan identifies the next step in plan preparation is the publication of a Places and Sites document (Part 2). This document will identify sites to meet the City's growth requirements. The preparation of this document should coincide with the finalisation of housing targets to be identified through the JCS. In light of the next stage, this submission promotes that Land East of Winnycroft Lane to provide residential-led development adjoining, and contained by, the existing built limits of Gloucester. Development at this location is considered highly sustainable in view of the existing facilities nearby to the site. Development could also provide the opportunity to enhance the wider community within the Matson and Robinswood Ward; recognised as falling within the 10% most deprived wards in the country. We set out below further background to Land East of Winnycroft Lane and enclose a Facilities Analysis Diagram which demonstrates the sustainable nature of the site, in light of the existing facilities and services in the immediate vicinity of Winnycroft Lane.</p> <p>Land East of Winnycroft Lane - The site identified as part of this consultation response is under single ownership. The land lies to the east of Winnycroft Lane comprises 20.21 hectares. The site is bounded by: Winnycroft Lane and existing residential development to the east; Lane associated with Winnycroft Farm to the north, beyond which lies residential development; The M5 motorway to the east; and Agricultural land to the south. The site is currently in agricultural use and is bounded by mature hedgerows. A number of further hedgerows run through the site and are interspersed with trees.</p> <p>Accompanying this submission is an assessment of nearby facilities and services, overlaid on a map base. This analysis highlights: that Matson Avenue local centre, 2 primary schools (Robinswood and Moat Primary) and 2 surgeries (Wheatway ;and Matson Lane) all lie within 1 kilometre of the site; Abbeymead District Centre, Gloucester Academy, along with further primary school and health care services, are situated within 2 kilometres of the site; existing bus routes, providing access to Gloucester City Centre, the train station and Gloucester Business Park, run close by to the site. Residential development at Winnycroft Lane would provide the opportunity to extend these routes improving service provision for the existing local community as well as servicing the site itself; the site is situated close by to areas of public open space and the Robinswood Hill Country Park; and the contained nature of the identified site, situated between existing residential development and the M5 motorway.</p> <p>SHLAA Assessment - The site has previously been identified by SHLAA site reference P-G-003 (December 2011). The Council's assessment of the site highlighted: the site can be accessed from the highway by Painswick Road and Winnycroft Lane; bus services operate in close proximity to the site; the site is located in fairly close proximity to a variety of primary services and jobs at Gloucester, though little within immediate vicinity; and the site is fairly well located to access key local services and facilities. The Peripheral SHLAA Site Conclusion identified the availability and achievability of the site was 'to be confirmed'. As part of the submission we confirm that the land is available for development. Allowing for the publication of the City Plan and obtaining the necessary planning consents, we consider that development could commence on site within a 3-5 year timeframe. Despite the above credentials, the SHLAA considered that the site was not suitable for development given that landscape constraints could not be overcome. This matter is considered in further detail below.</p> <p>Landscape - The site is currently designated as a 'Landscape Conservation Area'. This designation extends significantly to the west, covering Robinswood Hill and its surrounds. The site identified by this submission is, however, separated from the Robinswood Hill by existing residential development situated between Winnycroft Lane and Matson Lane. Within the South West Draft RSS Urban Extension Evidence Base Review (February 2077) Winnycroft Farm forms a small part of Land Cell L. The assessment of this Land Cell identified a 'notable' constraint was that the majority of it fell within the Robinswood Hill Special Landscape Area. A 'notable' constraint was defined as: - 'a factor to prevent or restrict strategic development in relatively small parts of the land cell; this may require mitigation, infrastructure and / or sensitive masterplanning to overcome'. Accordingly the synopsis for the Land Cell commented - 'with the exception of the Robinwood Hill Special Landscape Area, the evidence base has not identified further environmental / landscape constraints. There may therefore be development potential in this area if a sustainable transport strategy for this part of Gloucester could be formulated. Due to the potential site capacity, the site was assessed as having 'non-strategic development potential'; not suitable for identification through the Regional Spatial Strategy. However this overall analysis of Land Cell L does not rule out parts of this area being suitable for more modest expansion coming forward through the LDF process.</p> <p>We recognise the wider landscape contribution that the Landscape Conservation Area makes to the setting of the city of Gloucester, in particular in the vicinity of Robinswood Hill. However, Land East of Winnycroft Lane is separated from Robinwood Hill (Country Park) by existing residential development. Further residential development also lies to the north and north west of the site. The existing context of residential development, along with the M5</p>	<p>The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of development.</p> <p>Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector) as the capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.</p>

motorway, provides defensible boundaries for new development at this location. The JCS Broad Locations Report (October 2011) also assessed 'Winnycroft Farm' as part of a larger land parcel identified by reference 'G6 - Land at Brookthorpe with Whaddon'. The north east of Site G6 (i.e. land around Winnycroft Lane) was identified as having a medium landscape sensitivity, due to visual associations with Robinswood Hill and the Area of Outstanding Natural Beauty. However it was also recognised that this land parcel 'has a loss of tranquillity and is overlooked by housing development in Matson.'

Accordingly, the development of Land East of Winnycroft Lane could be achieved without detrimental impact upon the immediate landscape and wider setting of Robinswood Hill. Sensitive masterplanning and design, coupled with landscape mitigation measures, would enable development at this location without significant adverse impact on the environment. This approach is in accordance with the key sustainability theme of the NPPF, which seeks a balance between economic, social and environmental issues and the delivery of much needed housing growth. Green Belt - It is noted that the JCS Green Belt Assessment considered the inclusion of 'land south-east of Gloucester, around Robinswood Hill' within the Green Belt. The assessment, finalised in September 2011, identified no clear case for inclusion in the Green Belt, given the land does not perform a Green Belt role and would not physically link to the main area of Green Belt. It was considered that unrestricted sprawl could be controlled through other policy measures. Historic Environment - The scheduled Ancient Monument (SAM) of Sneedham's Green Moated Site lies to the south of the identified site at Winnycroft Lane. Land surrounding this SAM is identified as an Area of Archaeological Interest; Appropriate mitigation measures can be implemented to enable development at Winnycroft Lane, whilst safeguarding the SAM and its settings for the long term. Through the course of the Gloucester City Plan site allocation process, we would be happy to further explore the archaeological value of the site through appropriate technical assessments. Delivery - We confirm that the site is available for development. Subject to a development allocation and achieving the necessary planning consents, we envisage that the site could be delivered in a 3-5 year timeframe. Summary - In conclusion, we promote the allocation of land east of Winnycroft Lane for residential-led development through the Gloucester City Plan. The accompanying plan highlights the sustainable credentials of the site, by way of its proximity to existing education, community, employment and recreation facilities. The site offers a naturally contained development area that can deliver necessary housing growth at Gloucester in a sustainable location. Development at this location would have the added benefits of reducing the pressure for Green Belt release and not impinging on environmental assets of importance. It is envisaged that the site could deliver in the region of 300-450 dwellings. This is based on a density of 30 dwellings per hectare and allows for appropriate open space provision and landscape mitigation. The JCS process is currently assessing the additional level of growth required across the three administrative boundaries of Gloucester City, Cheltenham Borough and Tewkesbury Borough Council's for the period 2021-2031 (Phase 2). Land East of Winnycroft Lane would contribute to the development requirements of the area within this timeframe. The site also has the benefit of not being reliant on the delivery of significant new infrastructure and could therefore be delivered early in the plan period ahead of larger land releases that will need significant early infrastructure before housing delivery is commenced. We trust that the Council will take the above comments into consideration in order to inform the on-going preparation of the Gloucester City Plan. In light of our land ownership interest, we would be grateful if you would keep us informed of the on-going plan preparation process.

Although the City Plan confirms the requirement for it to be prepared in the context of the emerging Joint Core Strategy (JCS), it fails to acknowledge the need for the plan to be prepared having regard to the provisions within the emerging Stroud Local Plan. This is a critical omission that will need to be remedied owing to the emphasis that Section 110 of the Localism Act (2011) places on the Duty to Cooperate and the fact that Stroud District directly abuts the administrative boundary of Gloucester City and already accommodates growth as part of the enlarged Gloucester Urban Area. It is therefore submitted that the City Plan should be prepared having regard to both the emerging JCS and the Stroud Local Plan.

Noted.

The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also needs to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.

<p>I would like to see Gloucester grow and become once again the hive of activity it once was. But we need a high quality development to encourage aspirations and provide work. Also I would like to see Gloucester as a healthy city with low pollution in the air and waterways, with lots of opportunity for exercise, green areas, parks, and an athletics track to be proud of that could double as a stadium for events and concerts. Gloucester needs entertainment venues for its residents that are safe and fun. Gloucester lacks high quality nightlife for all its residents. People should have a reason to come into the city centre, somewhere to eat, a nighttime cafe culture (al Fresco eating) and entertainment. All these things provide employment, we have the population but they are going to Cheltenham for their nightlife and entertainment or to Bristol for shopping and nightlife. People are travelling as far as Birmingham and Cardiff for nightclubs and spa weekends, we need a high quality hotel in the city. If you would like a four/five star wedding venue you have to look outside the city. Spa breaks are very popular, and bring in tourists who would shop, we don't have a suitable place in Gloucester. an outstanding spa like Bath be a great asset.</p>	<p>Noted.</p> <p>Major regeneration in the city as is being planned for in the City Plan should continue to bring additional leisure and recreational facilities for the residents of Gloucester.</p> <p>Policies on Health and Wellbeing including Air Quality and Pollution have been prepared and tested through the Sustainability Appraisal.</p>
<p>Suggest that Green infrastructure is more closely linked to infrastructure provision (perhaps be reordering the list to put current items 2 and 8 closer together or by cross referencing. Also make it clear that new growth will be able to support improvements to existing strategic and green infrastructure rather than simply provide new.</p>	<p>Noted.</p>
<p>We have previously raised concern, on behalf of our client, about with the order in which the City Plan is being drafted. The Joint Core Strategy (JCS) is currently at an early stage - 'Developing the Preferred Option' and we question the logic behind progressing the City Plan, which is required to accord with the JCS, ahead of finalisation of this JCS document.</p>	<p>Noted.</p> <p>The City Plan will of course sit beneath, and carry forward the aims and objectives of the JCS. However, there is much work to be done and much that can be done alongside the JCS.</p>

<b>Other Comments Received not in the questionnaire format</b>	<b>Key points and Officer Response</b>
<p>Western Power Distribution may have/has a number of strategic electricity distribution circuits (which can operate at 132,000 volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary. Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.</p>	<p>Noted.</p> <p>Development Management have been notified of Western Power Distribution's request to be notified of Major applications.</p> <p>An Infrastructure Delivery Plan will be produced as evidence base to the City Plan.</p>
<p>NHS Gloucestershire welcomes the proposals set out in the City Plan Consultation and Kings Quarter Planning Concept Statement documents. The</p>	<p>Noted.</p>

availability of safe, affordable, warm housing is essential for health and wellbeing and we welcome sustainable infrastructure and housing growth to support the needs of the growing population in Gloucester. The proposed regeneration, infrastructure and housing developments provide a unique opportunity to significantly improve health and wellbeing. There are examples in Europe (for example Freiburg) where health outcomes in the local area have been significantly improved by the well considered design and layout of the community and associated infrastructure. With a growing population in Gloucester the role of community infrastructure in enhancing physical activity; providing access to local healthy food and protecting well-being through social cohesion cannot be understated. Prevention is always better than cure and we welcome the explicit references to the role of this proposed development in enhancing the health and wellbeing of people in Gloucester. The Health and Social Care Reforms set out a new vision for the leadership and delivery of health and care services. A key element of the reforms is the establishment of a Local Health and Wellbeing board that brings together local government, health and local communities to work together effectively to improve services and population health and wellbeing. The board will be responsible for the delivery of a local Joint Health and Wellbeing Strategy (JHWS) which will use the Marmot Review 'Fair Society, Healthy Lives' as a framework for tackling health inequalities. The Marmot review provides evidence on the links between the provision of more affordable housing and improved access to appropriate education and employment opportunities as important determinants of health outcomes across the life course. The JHWS will be published later this year. We would recommend this is explicitly mentioned in the Policy Context sections of the development proposals to ensure formal links are in place.

City Plan Part 1 response - The Department of Health has recognised the importance of delivering care closer to home and NHS Gloucestershire has been investing in primary healthcare facilities to ensure that people can access services close to home and to minimise waiting times. Delivering care in peoples own homes is equally important and the new role of telehealth will help people to self-manage some conditions. The new housing provision in Gloucester should provide for people's needs as they get older, to support independent living, for example through consideration of Lifetime Homes design criteria. The anticipated increases in the number of people in Gloucester will have implications for the demand for acute specialist services – particularly as the population ages, or, in the case of maternity services if the birth rate increases. Whilst we envisage that the overall number of beds on our sites may decrease over time, the two District General Hospitals will both continue to remain a key element of the existing NHS infrastructure. Our shared challenge will be to ensure that once patients no longer require the specialist input of the two District General Hospitals, that there are sufficient and appropriate facilities within the local communities themselves to enable people to return swiftly to their home areas. The layout of towns and cities and how we move around them has a significant impact on physical activity levels. The practicalities of planning the infrastructure to derive the best physical activity benefits is documented in the Active Planning Toolkit that was produced by a multi-agency partnership in Gloucestershire and can be found at <http://www.glospct.nhs.uk/pdf/publications/2011/ActivePlanningToolkit.pdf>. Access to good quality public open space has been shown to have positive impacts on mental and physical health and can help to reduce health inequalities. The commitment to protecting and improving the City's leisure, recreation and environmental assets is welcomed. Opportunities for leisure based activities should be promoted including walking, cycling and opportunities for outdoor play. These actions should help to tackle two of the greatest PH challenges for the City, namely obesity levels and mental health and wellbeing. It should be remembered that play does not need to take place at a 'playground' and the redevelopments should seek opportunities for natural play, for example the use of trees and the use of colour in the developments. The design and layout of neighbourhoods can provide natural surveillance over public space that can reduce both the fear and incidence of crime. The inclusion of community safety as a fundamental principle in the developments is welcomed and should include the provision of effective lighting to reduce opportunities for anti social behaviour and criminal activity. The planned developments provide an opportunity to contribute to the development of sustainable healthy communities in Gloucestershire. We therefore feel strongly that a policy for sustainable and healthy communities should be one of the essential policies developed within the developments. We enclose with this letter an outline of what such a policy could encompass. A lack of housing creates a complex range of health needs that all of the public sector agencies work hard to tackle. It is important for the delivery of a wide range of public services that key workers have access to affordable housing. It is also important that those homes built are designed to accommodate the key population groups and this means that we need to ensure that homes accommodate an increasingly older population. In line with the population demographics noted in the documents, housing is important to prevent younger people leaving the city in search of employment and thus affordable housing that allows younger people to remain in the county is also supported. It should be noted that there are alternative ways to increase housing provision without building new properties for example bringing vacant properties back to use and schemes such as Living Over The Shop (LOTS). One of the challenges identified in the City Plan consultation document is a need to regenerate the more deprived areas of the City to bring forward improved housing, access to jobs, services and open space. In addition to geographical pockets of deprivation, the plans also need to consider individuals and groups who may experience poorer health outcomes and barriers to accessing services and opportunities. The Annual Report of the Director of Public

A background Topic Paper on Health and Wellbeing has been produced to ensure that the City Plan takes account of all of the identified health and wellbeing issues facing the city.

<p>Health 2010-11 sets out examples of the types of groups which will need to be considered to ensure that any existing barriers to accessing services can be overcome. <a href="http://www.nhsglos.nhs.uk/your-local-nhs/about-nhs-gloucestershire/corporate-publications-and-strategies/director-of-public-health-annual-reports/">http://www.nhsglos.nhs.uk/your-local-nhs/about-nhs-gloucestershire/corporate-publications-and-strategies/director-of-public-health-annual-reports/</a></p> <p>The strategy to deploy housing growth to the northern periphery of the City's boundary in well integrated and connected areas has value. However, the document recognises that some communities in the south of the City Centre feel isolated and unconnected and any regeneration must ensure that these areas are not left behind. We must ensure that transport infrastructure and services are improved for all the City's residents and in line with the housing growth. We are aware that the detail around the exact location of the future developments is being further developed at present and we welcome the opportunity to be actively engaged and to shape the next stage of the plans. In order to support the anticipated growth in the population expected to be generated by the new housing developments included in these proposals and the Joint Core Strategy, due provision will need to be made to enhance, explore and expand primary and social care facilities related to such expansion proposals. Detailed healthcare related studies will be needed to assess the precise level of demand for services and the timing requirements of these services in conjunction with growth. The outcome of these studies will help to identify the specific need for land/properties in which we can provide these public healthcare services and will also help to establish the cost of providing such services. There will therefore be a need for both capital and revenue contributions arising from the provision of such health and social care services, which will need to be factored into the financial appraisals relating to the overall costs associated with the expansion proposals. NHS Gloucestershire welcomes the inclusion of leisure, food and drink establishments in both the proposed policy frameworks. It should be noted that these developments have a role to play in the provision of affordable local healthy food e.g. through local shops and grow your own schemes such as allotments. The provision of fast food outlets in near proximity to schools should be avoided and instead there should be access to healthy food options. The evidence base demonstrates the need to provide access to employment; social, cultural and leisure activities; goods and services and transport as key socio-economic determinants of health. We welcome the further engagement of Gloucestershire's Public Health Team, healthcare providers and commissioners during future stages of the developments.</p>	
<p>The statement that the Southern part of Gloucester suffers "isolation and lack of connection", and is "not sustainable" is of concern, as is the statement that there has been "artificial distortion with growth along the A38 to south". The fairly recent development of substantial areas of City at Hardwicke, Waterwells Business Park and Quedgeley, including the Kingway Development, have been supported and approved City Council, and these areas are very much part of Gloucester City and should be treated as such. The statement that Gloucester has a "significant number of development sites" is questionable, particularly in terms of the existing tightly constrained administrative boundary and the likelihood or not of any particular site being delivered. The statement that an additional 6,500 houses are required within the City boundary to 2031 in notes, but it is also noted that this assumes large numbers of houses to satisfy City needs are to be located beyond the boundary. In summary, the Strategy based on these particular statements needs reconsideration. There is land within the City boundary at Naas Lane which could be allocated for housing to assist in satisfying these needs. However, if the City Council remain of the view that land to the east Waterwells Business Park, including my Clients Land, is to be allocated for employment development, two general requirements to encourage the delivery of this development should be incorporated. However, if the City Council remains of the view that land to the east of Waterwells Business Park, including my Clients land, is to be allocated for employment development, two general requirements to encourage the delivery of this development should be incorporated. Firstly, the full range of employment uses (B1, B2 and B8) would need to be specified. Secondly, in order to address the high costs of infrastructure to serve this particular land, particularly at a time when development of employment land is not a market priority would need to be addressed by including an element of enabling residential development in the allocation of the land.</p>	<p>Noted.</p> <p>The City Plan should be consistent with the JCS strategy which is for growth to take place to the north of Gloucester. It also needs to account for the growth being planned for by Stroud district to the south of Gloucester, by for example planning for and taking account of the infrastructure improvements in this area that are identified in the Gloucestershire county Local Transport Plan.</p>
<p>We support the recognition that there is a need to accommodate a growing population and that 60% of this predicted growth will be from people within the working age range. There is a clear demonstrated need for affordable housing units within the city and it will be important that the right type of dwellings are planned. We could encourage the Council to consider the latest evidence base in line with guidance contained in the NPPF and to ensure that policies are based on identified needs. We are encouraged by the emphasis and recognition that it is 'vitally important' to provide new affordable housing to meet the needs of the city. We support the council in their efforts to try to plan for more affordable dwellings and would like to ensure that this policy remains a priority throughout the plan period. We would also like to point out that affordable housing should not only provide for single and young people but that there are many families and older people in housing need in Gloucester and their needs should be considered thorough policy. The Gloucestershire Strategic Housing</p>	<p>Noted.</p> <p>The City Plan will accord with the NPPF.</p> <p>Affordable homes and homes for older people will be addressed through the policies of the JCS and the City Plan.</p>

<p>Market Assessment (SHMA) indicated that house prices in Gloucestershire have been above average since 1996 and between 1996 and 2004 Gloucester (and Stroud) recorded the highest growth rates for entry level home. We therefore support the emphasis on affordable housing within the City Plan.</p> <p>Older People - We consider that the Council should produce a policy and strategic objective to meet the needs of older people. The NPPF requires local authorities to assess the needs of inter alia older people and to meet those needs where possible. There is a lack of recognition within the draft City Plan in particular of the special needs which are associated with providing care and accommodation for the ageing population within Gloucester. Page 7 of the City Plan state that Gloucester is expected to experience a growth in the number of people aged 65 and over, which will reflect national trends. The SHMA further indicates that innovative accommodation types may be required in the future to meet their need and extra care is mentioned on page 161 of the SHMA. We would like to encourage the Council to include a policy which addresses the full spectrum of housing care options including Continuing Care Retirement Communities (CCRC), care homes, extra care and sheltered housing.</p> <p>Key Development Principle 5 - We support this development principle and the need to plan for growth in the city with a balance of housing types to meet a diverse range of people. However, we consider that the figure of 325 new dwellings per annum is too low, it also prejudices the outcomes of this consultation process. A range of figures should have been provided and consulted upon before a final figure is produced. The household projections included on page 8 of the City Plan indicates that the population of the city will grow by 1,383 households per year. Clearly, some of this need will be met by existing housing but we consider to plan for only 325 new dwellings per year will not keep pace with the household projections.</p>	<p>The housing need for Gloucester will be set through the JCS process. Gloucester will be relying on neighbouring authorities to meet its housing need requirements.</p>
<p>Natural England broadly supports the City Centre first approach and we agree that steering development away from green field sites should make best use of land, minimise the need to travel and provide opportunities to enhance the City for new and existing communities. However future policy guidance will be needed to recognise and protect the potential ecological interest of some brown field sites. We are particularly pleased to note that the proposed Development Principles include the need for development to contribute to climate change mitigation and adaptation, maximise protection for and enhancement of important environmental and heritage assets and contribute to a connected City that people can enjoy and be proud of.</p> <p>Green Infrastructure (GI) - Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, river and wetlands'. (Natural Environment White Paper) Natural England appreciates that to some extent the principles of green infrastructure are conveyed in the City Plan and Concept Statement; however we believe GI should be strategically planned at all spatial scales and designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. We therefore strongly recommend that GI is incorporated into the next stages of the City Plan. The City Plan presents an opportunity to identify a strategic GI framework for Gloucester that reflects and responds to the built and natural environment, recognises and supports ecosystem services and contributes positively to the wider green network. This should inform the next stages of the City Plan preparation and provide guidance to lower tier plans, including Kings Quarter Concept Statement and to individual developments, which would help to ensure a coordinated and consistent approach is taken to GI provision and management, both within and beyond the City boundary. This approach would better reflect the multi-functional and cross cutting nature of GI planning and provision and would also accord with National Planning Policy Statement (NPPS) guidance that local planning authorities should set out a strategic approach in the Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>NPPF also identifies a need to plan for biodiversity at a landscape scale across administrative boundaries, requiring local authorities to:-</p> <ul style="list-style-type: none"> <li>• identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation</li> <li>• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets; and identify suitable indicators for monitoring biodiversity in the plan</li> <li>• aim to prevent harm to geological conservation interests; and</li> </ul>	<p>Noted.</p> <p>The Green Infrastructure evidence base collated for the JCS, and the policies contained within the JCS, have been used to inform locally specific policies with regard to GI, biodiversity and the wider natural environment.</p> <p>A Habitat Regulations Assessment was completed in Autumn 2016 for the emerging City Plan.</p> <p>Nature Improvement Areas and key open spaces have been plotted on the draft policy map.</p>

<p>• where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas</p> <p>There is considerable existing evidence and guidance available to the Council that is likely to be relevant to green infrastructure planning, including the Gloucestershire Nature Map developed by the Gloucestershire Biodiversity Partnership, the Rights of Way Improvement Plan, town/landscape assessments, and Historic Environment Records. Natural England would be pleased to provide further information on designated sites and landscapes if this is not already available to the Council.</p> <p>Habitats Regulations Assessment (HRA) - The Joint Core Strategy HRA Screening Report concluded that it is not possible, at this stage, to rule out likely significant effects on the integrity of certain European sites, either alone or in combination. Uncertainties remain about water quantity and quality, air pollution and recreational pressure. The likelihood of significant effects increases with the amount of development and with proximity to European sites. A need has been identified for urban extensions on the edge of Gloucester to meet estimated housing requirements. In our response to the recent Joint Core Strategy consultation, Natural England raised concerns that the evaluation of the Gloucester sites had not given due consideration to the proximity of the Cotswold Commons &amp; Beechwoods SAC. Lower tier plans and projects are also subject to the Habitats Regulations and the Council, as Competent Authority, is required to assess the likely effects of implementing the City Plan on European protected sites, both alone and in-combination. The process of screening the Plan for Likely Significant Effect (LSE) should be consistent with the approach being undertaken for the Joint Core Strategy HRA.</p> <p>Counteracting policies and measures will be an important consideration when assessing the likely effects of the City Plan on protected sites. The provision of well planned and managed green infrastructure would make an important contribution to mitigating the effects of growth and development on European designated sites. For example improving air quality by reducing the need to travel by private car through the provision of enhanced walking and cycling opportunities and off-setting recreational impacts by providing alternative green space and recreational opportunities. However these measures are more likely to be effective if they genuinely meet people's needs and are meaningfully coordinated across administrative boundaries.</p> <p>National Planning Policy Framework (NPPF) - The NPPF has been published during the consultation period. Natural England has not specifically considered the City Plan Part 1 or Kings Quarter Concept Statement with respect to the NPPF. We would expect the Council to consider compliance, but would be pleased to comment further on this in due course.</p>	
<p>NPPF section 50 encourages self-build. With a view to setting and meeting targets to meet needs of this particular market, Local Planning Authorities will need to have a clearer understanding of what the market requires, so that their plan is robust and suitably evidence based.</p>	<p>Noted.</p>
<p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>The new Sport England Strategy 2012-17 sets a challenge to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> See more people taking on and keeping a sporting habit for life</li> <li><input type="checkbox"/> Create more opportunities for young people</li> <li><input type="checkbox"/> Nurture and develop talent</li> <li><input type="checkbox"/> Provide the right facilities in the right places</li> <li><input type="checkbox"/> Support local authorities and unlock local funding</li> <li><input type="checkbox"/> Ensure real opportunities for communities</li> </ul> <p>Sport England has considered the City Plan (Part 1) to 2031 in the light of Sport England's 'Planning for Sport &amp; Active Recreation: Objectives &amp; Opportunities' (Interim Statement 2005). The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport</p>	<p>Noted.</p> <p>A number of policies have been designed to protect and enhance sports, playing fields and public open space.</p> <p>The Sport England's exception tests have been used in the development of the relevant policies.</p> <p>In addition to this a policy on Active Design has also been included.</p>

is necessary in order to ensure the sport and recreational needs of local communities are met.

1. Local Plan & CIL Evidence Base - The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, para 73 of the NPPF requires that: "Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area."

This includes a wide range of sport and recreation facilities including playing pitches, courts, swimming pools, sports halls, etc. It stresses that to ensure effective planning for open space, sport & recreation it is essential that the needs of local communities are known. Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sport and recreation. Assessments will normally be undertaken at district level, although assessments of strategic facilities should be undertaken at regional or sub-regional levels. Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development. We note that The Council is currently working towards a more detailed review of playing pitches.

2. Planning Obligations/Community Infrastructure Levy to Sport - Sport England supports use of planning obligations/community infrastructure levy as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF sport and recreation evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts. All new dwellings in Gloucester in the local plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.

Planning, leisure and sports officers should:

- Assess existing information on the need and demand for sport and recreation provision in terms of how it will assist in creating a CIL charging schedule
- Look at the potential for adapting any existing standard charge approaches to sport, currently used for section 106 agreements, into CIL charges
- Ensure liaison between sport and planning officers results in built sports facilities, as well as outdoor facilities such as playing fields, being included in CIL charging schedules
- Consider how lists of appropriate projects, in areas affected by development, can be established and prioritised for implementation

For information regarding planning obligations for sport:

[http://www.sportengland.org/facilities\\_\\_planning/planning\\_tools\\_and\\_guidance/planning\\_contributions.aspx](http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx)

For more information re: sport and CIL: [http://www.sportengland.org/facilities\\_\\_planning/planning\\_tools\\_and\\_guidance/planning\\_contributions\\_-\\_what/community\\_infrastructure\\_levy.aspx](http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions_-_what/community_infrastructure_levy.aspx)

3. Active Design - Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy. Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via [www.sportengland.org](http://www.sportengland.org). Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and



increasing awareness. Sport England would encourage the developers to design future proposals in Gloucester in line with the Active Design principles.

4. Community Use of Educational Sites - Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

PLANNING POLICY OBJECTIVE 9: To promote the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations. Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

5. Protecting Facilities & Playing Fields - Our Planning for Sport & Active Recreation: Objectives & Opportunities (Interim Statement 2005) has relevant objectives that may be of use to you:

PLANNING POLICY OBJECTIVE 2: To prevent the loss of facilities or access to natural resources which are important in terms of sports development. Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location. For playing fields Sport England will promote policies and practices that:

- make use of playing pitch assessments and strategies to identify the adequacy of existing provision to meet community needs for pitch sports;
- encourage greater community access to playing fields currently under private or educational ownership;
- encourage improvements to the overall quality of playing fields, e.g. through improved drainage or the provision of changing facilities;
- ensure that adequate funds are secured for maintenance where new or enhanced playing fields are provided in relation to new development; and
- clearly indicate the role of S106 agreements in helping to achieve the above policies.

PLANNING POLICY OBJECTIVE 5: To promote detailed local assessments of playing field requirements using the methodology as outlined in 'Towards a Level Playing Field'.

PLANNING POLICY OBJECTIVE 6: To ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England would consider any future planning application in the light of its playing fields policy [http://www.sportengland.org/facilities\\_\\_planning/putting\\_policy\\_into\\_practice/playing\\_fields.aspx](http://www.sportengland.org/facilities__planning/putting_policy_into_practice/playing_fields.aspx). The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met.

The Policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the

<p>judgement of Sport England, one of the specific circumstances applies.”</p> <p>Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met:</p> <p>E1 - “A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.”</p> <p>E2 - “The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.”</p> <p>E3 - “The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.”</p> <p>E4 - “The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”</p> <p>E5 - “The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.”</p> <p>Playing fields, sports buildings and facilities have been given greater protection and recognition by the Government through the recently published National Planning Policy Framework which states (paragraph 74):</p> <p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus of requirements; or</li> <li><input type="checkbox"/> The loss resulting from the proposed development would be replaced by equivalent or better provision in term of quantity and quality in a suitable location; or</li> <li><input type="checkbox"/> The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> <p>To counter this, a key element of the City Plan must be to promote a mixed housing strategy which offers greater certainty over delivery and the ability to plan for the full range of market and affordable housing needs on which the community depends. The need to provide larger dwellings at Gloucester was a key conclusion of the Gloucestershire Strategic Housing Market Assessment (Figure 14.11 refers) and is identified as a key issue in the Consultation Document.</p>	
<p>We generally support the Vision for Gloucester set out on page 1 of the Consultation Document. It 3.2is right that the City Plan fosters economic growth. However, the Vision does not acknowledge other key challenges facing the City, such as providing sufficient homes to support an expanding population and the need to identify suitable development sites in deliverable and sustainable locations. Accordingly this part of the Vision should be recast as follows: “We will work to encourage sustainable economic growth for the city’s expanding population by driving forward its regeneration programme and providing a sufficient quantum of housing and employment opportunities in suitable and sustainable locations.” The need to provide sufficient homes to support the growing population is rightly identified as a Key 3.3Challenge as well as a Key Development Principle. This document should go further to meet the</p>	<p>Noted.</p> <p>The City Plan seeks to maximise the spare capacity of land within Gloucester city whilst seeking an acceptable approach to design and sustainability in all specific cases of</p>

requirements of para 47 of the NPPF – significantly higher than the 6,500 dwellings This is particularly important given the strategic planning status afforded to Gloucester in the emerging Joint Core Strategy which is also reiterated in the Consultation Document. Whilst the overall level of housing for Gloucester City will be determined through the Joint Core Strategy process, it is important that the City meets objectively assessed levels of housing need and demand as required by para. 47 of the NPPF. In representations to the Joint Core Strategy Consultation in February 2012, the Trustees outlined their support for housing scenario D (40,500 dwellings for the Joint Core Strategy area). Moreover, evidence presented within the Part 1 Consultation would suggest that the level of household change will be some 16,600 dwellings by 2031. Once the strategic planning role afforded to Gloucester is taken into consideration this would be expected to increase further and would suggest the need for a significantly higher quantum of development than the 6,500 dwellings referred to in the Consultation Document. It will also be important for the City Plan to facilitate the development of a range and choice of 3.4housing – a key requirement of the NPPF (para. 47 refers). Hitherto, regeneration efforts have, so far as housing has been concerned, inevitably focused on high density schemes, which have typically been characterised by flatted development. This has narrowed the range and choice of housing and cannot be the sole focus for housing provision going forward. To counter this, a key element of the City Plan must be to promote a mixed housing strategy which 3.5offers greater certainty over delivery and the ability to plan for the full range of market and affordable housing needs on which the community depends. The need to provide larger dwellings at Gloucester was a key conclusion of the Gloucestershire Strategic Housing Market Assessment (Figure 14.11 refers) and is identified as a key issue in the Consultation Document. In order to satisfy the need and demand for housing and to achieve a more ‘balanced’ housing 3.6market, a portfolio of sites suitable for higher and low/medium density development will be required. This will inevitably involve not only previously developed land, but also greenfield land. We comment further on the most appropriate distribution of growth for Gloucester City in the following Section. In accordance with the NPPF, it is important that the location of new development will depend on a 3.7balance of considerations between economic, social and environmental impacts. Whilst it is therefore appropriate for the City Plan to provide sufficient protection of environmentally sensitive locations, there is a concern that in the case of some sites, such as Land at Corncroft Lane, Matson, too great an emphasis has been placed on the impact on landscape, particularly when the evidence presented to date does not support this view.

Distribution of Development within Gloucester City - The Consultation Document identifies that growth up to 2031 is “best directed” to the north of the 4.7City. Such a statement prejudices the outcome of the Joint Core Strategy process, which itself has only reached the development of the Preferred Option Stage (Regulation 25). The proposed distribution of growth outlined in both the City Plan and the Joint Core Strategy would 4.8see the identification of a significant quantum of strategic development within one location, to the north of Gloucester. It is the deliverability and identification of such a distribution of growth which most concerns the Trustees, particularly so early within the process and absent the evidence to demonstrate it is the appropriate strategy.

In its current form the Joint Core Strategy would see the development of some 5,350 dwellings 4.9developed on strategic development sites to the north of Gloucester. If a higher housing requirement were pursued, the quantum of development to the north of Gloucester could be increased further through the identification of broad locations. The deliverability of this quantum of development must be questioned. It would represent a 4.10significantly higher rate of development than delivered at both south west Gloucester and at RAF Quedgeley. To ensure the deliverability of both the Joint Core Strategy and the City Plan it is therefore 4.11necessary to re-examine the most appropriate strategy for accommodating development at Gloucester. This affords a very obvious role for smaller sites within the City’s administrative area to provide development land throughout the plan period. Where this involves no conflict with properly identified constraints, it represents a valuable source of housing potential. Such sites generally have additional merits – often they will be more straightforward to implement; 4.12they can contribute to the mix and range of housing opportunities consistent with Government Policy; are not located within the Gloucestershire Green Belt and they are in equally or more sustainable locations than the strategic urban extension sites. Thus they will add flexibility and should be properly reflected in emerging Development Plan policy. It is in this regard that land at Corncroft Lane, Matson provides an eminently suitable location. The 4.13NPPF emphasises that Green Belt release should only be contemplated in exceptional circumstances. The availability of alternative non Green Belt sites at Gloucester should represent a priority location for the City’s future development. Information regarding the suitability of this site is provided in the following Section. In addition to the above, the Trustees are also concerned that alternative distributions of growth 4.14have not been assessed through a robust Sustainability Appraisal. Absent this evidence there can be no certainty that the strategy outlined in the Consultation Document is the most appropriate strategy when compared against reasonable alternatives, which is a requirement of the NPPF (para. 182 refers) In the submission of the Trustees, the Gloucester City Plan must have regard to the following: 6.1 The City Vision is focused too narrowly on regeneration initiatives and does not acknowledge the other key challenges identified in Part 1 of the City Plan; There is a need for the City Plan to provide an appropriate

development.

The Objectively Assessed Need has been determined through the JCS process.

A choice of housing will be provided to meet the need as outlined in the latest housing needs evidence base.

Winnycroft is an area that is likely to be included in the JCS (as recommended by the Inspector) as the capacity of the site(s) is now estimated to be 620 dwellings which puts it into the category of a Strategic Allocation for the purposes of the JCS.

framework for the distribution of a level of housing akin to objectively assessed development requirements; There is a need to provide a range of housing types and tenures; The City Plan must provide a careful balance between environmental and other objectives. At present there is a concern that it will place too great an emphasis on untested and non-statutory environmental constraints when considering the suitability of sites to accommodate development;

It is appropriate that the City Plan identifies Gloucester as a focus for growth within the County; The development of non-Green Belt land should be afforded a priority over development in Green Belt locations; The spatial strategy for Gloucester City places too much strategic development in one location (North Gloucester). To ensure the Vision is delivered, the strategy should recognise the obvious benefits associated with the development of smaller sites, such as Land at Corncroft Lane, Matson; and Land in the control of the Trustees at Corncroft Lane, Matson should be recognised as suitable to contribute to the necessary mixed housing strategy for the City. It is being promoted to deliver between 150-200 dwellings.