



# Gloucester City Council

## Cabinet

**Meeting: Wednesday, 4th May 2022 at 6.00 pm in Civic Suite, North Warehouse, The Docks, Gloucester, GL1 2EP**

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

## AGENDA

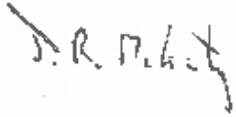
<b>1.</b>	<b>APOLOGIES</b>  To receive any apologies for absence.
<b>2.</b>	<b>DECLARATIONS OF INTEREST</b>  To receive from Members, declarations of the existence of any disclosable pecuniary, or non-pecuniary, interests and the nature of those interests in relation to any agenda item. Please see Agenda Notes.
<b>3.</b>	<b>MINUTES</b> (Pages 7 - 12)  To approve as a correct record the minutes of the meeting held on 6 <sup>th</sup> April 2022.
<b>4.</b>	<b>PUBLIC QUESTION TIME (15 MINUTES)</b>  The opportunity is given to members of the public to put questions to Cabinet Members or Committee Chairs provided that a question does not relate to: <ul style="list-style-type: none"><li>• Matters which are the subject of current or pending legal proceedings or</li><li>• Matters relating to employees or former employees of the Council or comments in respect of individual Council Officers.</li></ul> To ask a question at this meeting, please submit it to <a href="mailto:democratic.services@gloucester.gov.uk">democratic.services@gloucester.gov.uk</a> by Thursday 28 <sup>th</sup> April 2022 or telephone 01452 396203 for support.

5.	<p><b>PETITIONS AND DEPUTATIONS (15 MINUTES)</b></p> <p>To receive any petitions or deputations provided that no such petition or deputation is in relation to:</p> <ul style="list-style-type: none"> <li>• Matters relating to individual Council Officers, or</li> <li>• Matters relating to current or pending legal proceedings</li> </ul>
6.	<p><b>LEADER AND CABINET MEMBERS' QUESTION TIME (15 MINUTES)</b></p> <p>Any Member of the Council may ask the Leader of the Council or any Cabinet Member any question without prior notice, upon:</p> <ul style="list-style-type: none"> <li>• Any matter relating to the Council's administration</li> <li>• Any matter relating to any report of the Cabinet appearing on the summons</li> <li>• A matter coming within their portfolio of responsibilities</li> </ul> <p>Only one supplementary question is allowed per question.</p> <p>Questions must be submitted to <a href="mailto:democratic.services@gloucester.gov.uk">democratic.services@gloucester.gov.uk</a> by 12 noon on Thursday 28<sup>th</sup> April 2022. Responses to questions will be published in an addendum to the agenda by 12 noon on the day of the Cabinet Meeting.</p>
7.	<p><b>GLOUCESTER CITY PLAN - MAIN MODIFICATIONS (Pages 13 - 412)</b></p> <p>To consider the report of the Cabinet Member for Planning and Housing Strategy seeking approval for the publication of the Main Modifications to the Gloucester City Plan for public consultation.</p>
8.	<p><b>GLOUCESTERSHIRE STATEMENT OF COMMON GROUND (Pages 413 - 452)</b></p> <p>To consider the report of the Cabinet Member for Planning and Housing Strategy seeking approval from Members for the Gloucestershire Statement of Common Ground.</p>
9.	<p><b>GLOUCESTER BUSINESS IMPROVEMENT DISTRICT (BID) PROPOSAL FOR BID TERM 2 (Pages 453 - 460)</b></p> <p>To consider the report of the Cabinet Member for Communities and Neighbourhoods seeking Members to review the BID proposal for Term 2 including the draft business plan and process for a renewal ballot.</p>
10.	<p><b>LEISURE AND CULTURE OPTIONS APPRAISAL, CONTRACT EXTENSION AND INTERIM ARRANGEMENTS (Pages 461 - 494)</b></p> <p>To consider the report of the Cabinet Member for Culture and Leisure seeking to update Members on the existing culture and leisure provision and for them to consider future options.</p>



**11. ICT SERVICES: OPTIONS REPORT (Pages 495 - 500)**

To consider the report of the Cabinet Member for Performance and Resources seeking to ensure continuation of ICT services beyond the current contract end date of 30<sup>th</sup> April 2022 .



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

**Date of Publication: Tuesday, 26 April 2022**

## NOTES

### Disclosable Pecuniary Interests

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

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

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

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

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

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

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

### **Recording of meetings**

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

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

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

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## CABINET

**MEETING** : Wednesday, 6<sup>th</sup> April 2022

**PRESENT** : Cllrs. Cook (Chair), Norman, S. Chambers, Hudson and Lewis

**Others in Attendance**

Cllrs. D. Brown, Hilton, Wilson

Head of Culture

Democratic and Electoral Services Officer

**APOLOGIES** : None

### 106. DECLARATIONS OF INTEREST

There were no declarations of interest.

### 107. MINUTES

**RESOLVED** that the minutes of the meeting held on 9<sup>th</sup> March 2022 are confirmed as a correct record and signed by the Chair.

### 108. PUBLIC QUESTION TIME (15 MINUTES)

The Democratic and Electoral Services Officer read the following question on behalf of a member of the public who was unable to attend in person.

The city centre is where we need a clear and obvious statement of support for Ukraine. Although a Ukrainian flag is being flown at the North Warehouse this is out of the way and that at the Shire Hall does not draw the eye and represents the county. I would like to ask why the City has not hung flags or banners in the city to keep the current conflict in the public consciousness and encourage residents to continue making their own contributions in whatever form they are able?

The Leader of the Council thanked the member of the public and advised him that there was a third flag flying in a more central location at the Gloucester Guildhall. He further informed him that the demonstration of the newly installed lighting and fountains in Kings Square had used the national colours of Ukraine and he anticipated they would do so again in future performances. The Leader of the Council expressed confidence that media coverage continued to give the conflict a high public profile.

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The Leader of the Council commented on a suggestion previously received for bunting to be displayed in the streets but stated that he felt this would not be appropriate given the gravity of the situation in the Ukraine. He highlighted the resolution of the Council made on the day armed conflict began (24 February 2022 minute 84.5) to condemn Russian aggression, support the people of Ukraine and to write to the relevant ambassadors. The Leader of the Council took the opportunity to inform Members that he considered certain councillors and residents to be doing an amazing job gathering and delivering aid to the people of Ukraine.

A member of the public representing Gloucestershire Catch The Bus Campaign referred to the written questions submitted as below. The Cabinet Member for Performance and Resources expressed her gratitude for bringing these matters to her attention and advised him that the answers would appear in the minutes as below. She further reassured him that the issues in question would be raised with the relevant highway authority whom the City Council would lobby on his behalf, but advised him also to submit these questions to the County Council directly.

- (1) Gloucester Transport Hub is one of the best bus and coach stations in South West England. What progress is being made by the City Council, as its owner, to improve the cleaning of the ceilings and interior and to make sure all departures are displayed, especially given that more services will be calling from April 2022?

**Cabinet Member for Performance and Resources Response:** Thank you for this insightful question. The City Council owns the Gloucester Transport Hub to facilitate the transport services. However, the services in question are the responsibility of, and organised by, the Integrated Transport Unit of the County Council, including all the bus timetable and real time information displays. Therefore I cannot answer your questions in that regard to those services but the County Council should be able to assist. Where we can work with the County Council to make physical improvements, we will continue to do so.

Stagecoach, who are the main occupiers of the Gloucester Transport Hub undertake the cleaning, as they are present daily and can best deliver the cleaning requirements. The Council meets the cost of the cleaning provision and it is one of the most comprehensive cleaning services we are involved in. 'High cleans' for ceilings will occur less often as they involve the use of specialist equipment which also requires the Transport Hub to be closed to the public. This is the first time that the cleaning of the Transport Hub bus station has been raised, and I will forward your comments to Stagecoach.

- (2) In view of the ownership of the Gloucester Transport Hub being managed by Gloucester City Council, what progress is being made to bring back the cafe and to relet the kiosk, and is Tesco PLC blocking the reopening of these important passenger facilities with their remaining lease on the adjacent site?

**Cabinet Member for Performance and Resources Response:** Although owned by the City Council the Gloucester Transport Hub is managed by Stagecoach. COVID-19 affected many businesses detrimentally, and the Cafe and Kiosk fell into this category. Unfortunately matters must formally run their course before we are

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legally able to relet these spaces. On a positive note interest has been expressed in both of these opportunities. As soon as we can, we will progress with a marketing campaign to ensure these spaces are bought back into use. Tesco is not causing us any issue in this regard.

- (3) What discussions are taking place under the Gloucestershire Bus Service Improvement Plan and the Enhanced Quality Partnership with Gloucestershire County Council (the transport authority) and service providers on marketing campaigns to get passengers back onto public transport considering reductions in bus service recovery and railway grants from the Department of Transport?

**Cabinet Member for Performance and Resources Response:** This is a matter for the County Council however my fellow Cabinet Members and I are keen to promote green travel options, including public transport. The annual review of initiatives in the City Council Green Travel Plan is due to be considered by Cabinet in July.

- (4) With more bus and coach services using Gloucester Transport Hub there is a need to look at safety of passengers walking on the runway and signage on the automatic doors and also the bollards and kerbs as their positioning makes use of the automatic bus access ramps difficult for buggy and wheelchair users. Are these issues being looked at?

**Cabinet Member for Performance and Resources Response:** Thank you for raising this matter. Public safety and the accessibility of services to all users are of prime importance to us. I shall raise these concerns with Stagecoach who operate the Transport Hub.

- (5) What progress is being made on clear way-finder signage from the railway station to the Transport Hub and bus and coach service information displays at the former in view of the importance of the Transport Hub to integrated transport within the city and county?

**Cabinet Member for Performance and Resources Response:** Once again these are in the County Council's control, through either County Highways (street signage) or the Integrated Transport Unit, however we can flag these issues with them. We are happy to continue to work with the County Council to continue to help facilitate the services delivered and make improvements where we are able.

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

There were no petitions or deputations.

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

In respect of question 1 Councillor Wilson advised that some trees had been planted in inappropriate positions on Hucclecote Green. He sought reassurance that volunteer groups would not be left alone to rectify such situations and that in this case the Friends of Hucclecote Green would be assisted.

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The Cabinet Member for Environment stated that there was no expectation for volunteer groups to move planted trees. He recommended that the Climate Change Manager be alerted to the Hucclecote Green issues so action can be taken.

In respect of question 2 Councillor Wilson sought confirmation that the City's own tree planting budget could be carried forward into the 2022/23 financial year irrespective of the deadline required to spend the grant money received for the same purpose. The Cabinet Member for Environment confirmed that the budget in question would be carried forward.

In respect of question 3 Councillor Hilton requested the most recent date before the cyber incident when an insurance decision was made. The Cabinet Member for Performance and Resources replied that as she was not the decision maker herself, she would consult officers and supply a written answer.

In respect of question 4 Councillor Hilton queried what records there were of relevant discussions following the incident in question. The Cabinet Member for Performance and Resources responded that although she believed the dialogue between the then Cabinet and officers to have been unminuted, she would make enquiries with officers and deliver a written answer directly.

In respect of question 5 Councillor Hilton enquired when a planning application might be made. The Cabinet Member for Environment informed Councillor Hilton that he believed it was usual in such cases for the developer to ensure all funding was in place before submitting an application so he was not expecting an application yet.

In respect of question 6 Councillor Hilton asked when ward councillors would be briefed on options for the Wessex House site. The Cabinet Member for Planning and Housing Strategy confirmed that officers were keen to progress the development and that a briefing would take place at a future Group Leaders' meeting.

In respect of question 7 Councillor Hilton noted the importance to the development of the land belonging to Tesco PLC. He sought confirmation that its inclusion was guaranteed. The Cabinet Member for Planning and Housing Strategy gave her assurance that a written answer would be provided.

In respect of question 8 Councillor Hilton reminded Members that reports had been made of problems in the streets around the Public Space Protection Order (PSPO) area in Kingsholm. He sought clarification of progress being made to extend the PSPO. The Cabinet Member for Communities and Neighbourhoods reiterated the need for the Police to have sufficient evidence of disorder before the PSPO could be extended. He noted the reports alluded to and pledged to take the matter forward with officers.

In respect of question 9 Councillor Hilton informed Members that he received emails on the matter regularly from Kingsholm residents and noted the importance of the open space to them. He asked what the ways under consideration to make



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camping less attractive referred to in the written answer were. The Cabinet Member for Environment reassured Councillor Hilton that the ward councillors would be fully briefed on solutions including boulders and new trees. He further commented that although physical barriers might be most effective, they would be detrimental to the public's enjoyment of the park.

**RESOLVED** that the written questions submitted and corresponding responses are noted.

**111. EQUALITIES WORKING GROUP UPDATE**

Cabinet considered the report of the Cabinet Member for Communities and Neighbourhoods that updated Members on the work officers have undertaken regarding equalities, as well as the work that the Equality and Diversity Working Group has completed, this year.

The Cabinet Member for Communities and Neighbourhoods highlighted the key features of and background to the report. He particularly drew Members' attention to the Commission to Review Race Relations (3.3.1) and the Monuments Review (3.3.2). The Leader of the Council commented on the enormous amount of effort put in by the contributors to both and the extraordinary breadth and depth of the latter.

**RESOLVED** that the work undertaken by Council officers, the Equality and Diversity Working Group, elected members and Council partners regarding equalities is welcomed.

**Time of commencement: 6.00 pm**

**Time of conclusion: 6.37 pm**

**Chair**

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# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>4 May 2022</b>
<b>Subject:</b>	<b>Gloucester City Plan – Main Modifications</b>		
<b>Report Of:</b>	<b>Cabinet Member for Planning and Housing Strategy</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Adam Gooch – Planning Policy Manager</b>		
	<b>Email: adam.gooch@gloucester.gov.uk</b>	<b>Tel:</b>	<b>39-6836</b>
<b>Appendices:</b>	<ol style="list-style-type: none"> <li><b>1. Inspector’s Post Hearings Letter (August 2021)</b></li> <li><b>2. Schedule of Proposed Main Modifications</b></li> <li><b>3. Policies Map and Policies Map Addendum</b></li> <li><b>4. Sustainability Appraisal Addendum</b></li> <li><b>5. Schedule of Additional Modifications</b></li> <li><b>6. Gloucester City Plan with proposed modifications (tracked changes)</b></li> </ol>		

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

1.1 To seek approval from Cabinet for the publication of the Main Modifications to the Gloucester City Plan for public consultation.

**2.0 Recommendations**

2.1 Overview and Scrutiny Committee is asked to consider the information in the report and make any recommendations to Cabinet.

2.2 Cabinet is asked to **RESOLVE that:**

- (1) **The proposed Main Modifications to the Gloucester City Plan as set out at Appendix 2 (including proposed modifications to the Policies Map), be approved for public consultation, alongside Additional Modifications and the Sustainability Appraisal and Habitats Regulations Assessment addendum.**
- (2) **The correction of any minor errors such as spelling, grammar, typographical and formatting changes that do not affect the substantive content of the plan be delegated to the Head of Place, in consultation with the Cabinet Member for Housing and Planning.**

**3.0 Background and Key Issues**

3.1 Local authorities have a statutory requirement to prepare a Development Plan. Gloucester City Council has chosen to do this through the preparation of two key documents: the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), and the Gloucester City Plan (GCP). Together, they will provide the planning

framework for the city until 2031, along with any Neighbourhood Development Plans that are 'made' (currently none) and the waste and minerals plans (prepared by the County Council).

- 3.2 The JCS was adopted in December 2017 and sets out the vision and objectives for the area together with strategic policies for shaping new development up to 2031. The JCS sets the overall need for housing and employment growth, the spatial strategy for meeting these needs and allocates a number of large strategic sites for development.
- 3.3 Whilst the JCS provides the higher-level strategic part of the Development Plan, more detailed, locally specific planning policies and smaller-scale site allocations are provided through individual district-level (second tier) plans. For Gloucester this is the GCP. A key role for the GCP is to help deliver the development requirements and spatial strategy of the JCS and the GCP therefore needs to be consistent and in conformity with it.
- 3.4 The GCP was submitted to the Secretary of State for Housing, Communities and Local Government for examination on 20<sup>th</sup> November 2020. Subsequently, virtual hearing sessions were held during May and June 2021 and the Inspector's 'Post Hearings Letter' was received on 17<sup>th</sup> August 2021, setting out preliminary conclusions (Appendix 1). The letter confirms the GCP is legally compliant, has passed the Duty to Cooperate and can be found 'sound' with 'Main Modifications'.

### **Proposed Main Modifications**

- 3.5 In the Post Hearings Letter, the Inspector has concluded that the GCP is legally compliant, has met the duty to cooperate, but that the Plan as submitted is 'unsound'. However, these soundness issues can be addressed through changes to the plan, known as Main Modifications (MMs) and these are set out in the letter, along with headline reasons. Consequential changes are required to be made to the draft Policies Map, though technically these do not form part of the MMs.
- 3.6 Following receipt of the Inspector's letter, officers have engaged with the Inspector and agreed a schedule of MMs that address the issues identified (Appendix 2), together with changes to the Policies Map (Appendix 3). An addendum to the Sustainability Appraisal and Habitats Regulations Assessment has also been undertaken in relation to the MMs (Appendix 4). The MMs set out are considered by the Inspector to be necessary in order to make the Plan sound and to allow it to proceed to adoption. Other minor grammatical corrections and non-material changes, known as 'Additional Modifications' (AMs), will be permissible without needing public comment or the Inspector's approval (Appendix 5). The Inspector's MMs may also require consequential amendments to some of the policies and reasoned justification. For ease of use, a copy of the submitted plan, with the MMs and other changes shown as tracked changes is provided (Appendix 6).
- 3.7 Once agreed by Cabinet, it is necessary to undergo a period of formal public consultation on the MMs because they are material changes upon which the public and other interested parties are required to have the opportunity to comment on under the Town and County Planning (Local Planning) (England) Regulations 2012. The consultation will focus on the proposed MMs; it is not the opportunity to raise

matters that were, or could have been, part of earlier representations or hearings on the submitted Plan.

- 3.8 The more significant changes required by the Inspector to make the plan sound are summarised below. The Inspector has provided more detailed reasoning in respect of these issues in the Post Hearings Letter.
- 3.9 **Housing and employment provision:** The Inspector is satisfied that the GCP proposes to allocate sufficient deliverable housing and employment sites to meet the needs of the city, as set out in the adopted JCS. Furthermore, that as of the end of March 2021, that the Council has a 5-year housing land supply of 5.0 years. The Inspector was further convinced that the City Council has undertaken a comprehensive search for sites to provide for Gypsy, Travellers and Travelling Showpeople need, that no deliverable sites currently exist in Gloucester City, and that officers are continuing to search for sites to address this need.
- 3.10 However, in relation to general housing and accommodation needs for traveller communities, there is an acknowledged shortfall. On this basis, the Inspector requires additional wording to make clear that the City Council is supportive of windfall developments (those not allocated in the plan) where they are consistent with the policies of the Development Plan.
- 3.11 **Climate change and resource efficiency:** The Inspector considered that elements of the plan should be strengthened with regard to climate change, waste reduction and underused buildings and space, requiring changes to the Vision and Key Principle 1.
- 3.12 **Affordable housing:** The Inspector has concluded that affordable housing is a strategic matter that should be addressed through the JCS, and that the approach set out in the Pre-Submission Plan was not consistent with the provisions of the adopted JCS. This policy has therefore been deleted and planning applications will now be determined in accordance with Policy SD12 'Affordable Housing' of the JCS.
- 3.13 **Homes in Multiple Occupation:** Policy A1 'Effective and efficient use of land and buildings' of the Pre-Submission GCP included provisions relating to Houses in Multiple Occupation. The Inspector felt this issue necessitates a specific policy, which has now been created.
- 3.14 **Accessible and adaptable homes:** In considering the viability of development, the Inspector considers that the requirement for 50% of new homes to meet 'accessible and adaptable' homes standard should be reduced to 25%.
- 3.15 **Cordon Sanitaire – Netheridge Sewage Treatment Works:** The Inspector considered the Cordon Sanitaire policy should be more positively worded and set out circumstances where planning permission would be granted for development. The policy needs to clarify that the boundary is a trigger for odour testing, to protect against proposals that are sensitive to odour and to ensure that proposals would not undermine the effective operate of the sewage works.
- 3.16 **Sustainable transport and parking:** The Inspector considered this policy should be rewritten to set out the sustainable transport criteria against which future development proposals will be determined, and to include parking requirements.

- 3.17 **Site allocations:** Several site allocations have been removed, either because they already have planning permission and development has started onsite (for example 'King's Quarter' and 'Land at Rea Lane', or the Inspector felt they were undeliverable (for example 'Lynton Fields', where the landowner confirmed the site was no longer available for employment development).
- 3.18 The Inspector considered that the indicative capacity of three sites should be increased, namely 67 – 69 London Road (former Prospect House), Great Western Road Sidings and Wessex House. In contrast, the capacity at the Jordon's Brook House has been reduced to allow for a proposal health centre on part of the site.
- 3.19 Other changes are required to address factual matters, such as the introduction of an updated National Planning Policy Framework (July 2021), significant changes to the Use Classes Order through the introduction of new legislation (Town and County Planning (Use Classes) (Amendment) (England) Regulations 2020), and the removal of reference to other plans and strategies from policy wording. There are further consequential amendments in terms of formatting and structure, arising from other modifications, such as policy numbering and order, and the Inspector asked for each policy to be accompanied by additional wording to explain the relationship between the GCP policy and other Development Plan Documents (namely the adopted Joint Core Strategy, Minerals Local Plan and Waste Local Plan).
- 3.20 Furthermore, since the Inspector's post hearings letters was received, new building regulations have been introduced that require vehicle charging points in new development. This renders policy G2 obsolete and this will be deleted.

#### **4.0 Social Value Considerations**

- 4.1 The GCP includes Policy B1 'Employment and Skills Plans', which seeks to generate social value from new developments in Gloucester, through the identification of opportunities for employment and skills opportunities for local people.

#### **5.0 Environmental Implications**

- 5.1 The GCP (along with the adopted JCS) provides a key part of the Development Plan for Gloucester City, setting the sustainable planning framework to 2031. It balanced economic, social and economic considerations to achieve the most sustainable outcome for the city. In this regard, the GCP has been subject to an ongoing and iterative Sustainability Appraisal and Habitats Regulations Assessment process by independent consultants, and the MMs have been subject to further consideration (see Appendix 4)

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

- 6.1 At this stage in the process, changes to a Local Plan are Inspector-led, being amendments necessary to make the plan 'sound'.

#### **7.0 Reasons for Recommendations**

- 7.1 The Inspector requires MMs to be made in order that the GCP can be found sound and adopted by the City Council. The MMs are material changes where the public

and other interested parties must have the opportunity to comment (Town and Country Planning (Local Planning) (England) Regulations 2021). Therefore, a period of consultation is required, and approval is sought from Cabinet for the MMs, after which this will commence.

## **8.0 Future Work and Conclusions**

8.1 Cabinet approval is sought for the Main Modifications, and other supporting documents, to be subject to a six-week period of public consultation (dates to be confirmed). Following completion of consultation, the responses will be passed to the Inspector for consideration. The Inspector may then decide to hold examination hearing sessions to consider issues further. The Inspector will then issue her final report, the Council may formally adopt the GCP and it may be given full weight in determining planning applications.

## **9.0 Financial Implications**

9.1 The remaining steps in the examination process have officer resource requirements, for example in undertaking the public consultation and potentially attending further examination hearing sessions. Examination costs are factored into existing budgets.

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

## **10.0 Legal Implications**

10.1 Local authorities have a duty to prepare and keep up to date a Local Plan. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the statutory procedures for preparing planning policy documents. The GCP has been prepared in accordance with legislation and the National Planning Policy Framework.

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

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

11.1 The main risk at this stage relates to resources. However, officer resource has been identified within the Planning Policy Team to progress the MM consultation and next stages of the examination, and adequate budget is secured.

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

12.1 The GCP process included an Equalities Impact Assessment, which did not identify any potential or actual negative impact, therefore a full PIA was not required. An addendum has been completed as part of the Sustainability Appraisal process (Appendix 4).

## **13.0 Community Safety Implications**

13.1 The GCP includes Policy F3 'Community Safety, which seeks to ensure that developments are designed so as to ensure community safety is a fundamental principle in the design and layout of development, for example through maximising natural surveillance and attractive and safe streets.

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

14.1 None

### **Background Documents:**

Gloucester City Plan Pre-Submission (September 2019)

Gloucester City Plan Sustainability Appraisal and Habitats Regulations Assessment  
(September 2019)



Ian Kemp  
Programme Officer  
Gloucester City Local Plan Examination  
PO Box 241, Droitwich, Worcestershire, WR9 1DW  
Mobile: 07723 009 166  
E-Mail: idkemp@icloud.com

Adam Gooch  
Planning Policy Manager  
Gloucester City Council  
Shire Hall  
Westgate Street  
Gloucester  
GL1 2TG

19<sup>th</sup> August 2021

Dear Mr Gooch

**Gloucester City Plan 2011- 2031: post hearing letter**

1. As discussed on the last day of the hearings, I am pleased to provide you with my initial findings. I have found that the production of the Gloucester City Plan (GCP) has met the Duty to Co-operate and is legally compliant.
2. The plan, as submitted, is unsound but could be made sound through main modifications (MMs). To do this, I would ask the Council to prepare a schedule of potential MMs for formal consultation based on the MMs referred to in this letter and the accompanying appendix. This appendix also sets out any consequential amendments which would be necessary to the policies map.
3. I have concluded that these MMs are necessary, having taken into account the evidence, and documents which were considered at the examination hearings, my visits to the City, together with the additional information which I had requested, and which was made available for comment. Following the hearings, I have also undertaken a site visit of the Netheridge Waste Water Treatment Plant and the surrounding area.
4. This letter highlights several matters. However, my reasoning for all my recommended MMs will be set out in my final report to the Council. This will be provided after a period of formal consultation has taken place. The timetable for which should be agreed with me via the Programme Officer.

### Status of the Plan

5. The GCP is the daughter plan to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011- 2031. The adopted JCS sets out the strategic policies for the three districts, including the quantum of development which is expected to be delivered over the plan period. The most recently adopted Local Development Scheme (LDS) (CD009) describes the role of the GCP as, 'Delivers the JCS locally. Identifies and allocates local sites for development. Contains criteria-based policies against which all development within the City will be determined.' This explanation, and the short length of the plan period, is consistent with the description of non -strategic policies within the Framework.

6. However, some of the policies in the GCP, as submitted, are referred to as being strategic. Consequently, MMs are required to ensure that references to any of the policies being strategic are removed, and to make clear how the GCP relates to the policies of the JCS. This is to ensure that there is no ambiguity within the plan, as to its limited role to implement the policies of the JCS, and, where appropriate, to refine them without overreaching the parameters set within the JCS.

### Viability

7. In principle, the quantum of development proposed to be provided within the GCP should be viable as it has been tested as part of the JCS and as part of the CIL examination. Nonetheless, the additional costs resulting from the policies of the Plan, as submitted, have been tested, as have other scenarios, including the reduction in affordable housing requirement from 25% to 20%. Subject to a MM, requiring the reduction in the proportion of dwellings being required to meet Building Regulations requirement M4 (2), from 50% of all housing developments to 25%, I am content that the total cumulative costs of all relevant policies will not undermine deliverability of the plan.

### Housing provision

8. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) sets out the amount of housing development and its distribution for the three planning authorities. Policy SP1 of the JCS sets out a minimum housing requirement of 14, 359 homes for Gloucester.

9. It was accepted, at the time of the JCS examination, that it would be difficult for Gloucester to make provision for all its housing needs within its administrative boundaries. As such, the JCS in Table 2 SP2b: Apportionment of Strategic Allocation sites and District Capacity for Gloucester, Cheltenham and Tewkesbury references Gloucester City's

supply of c 13, 287 dwellings. This is made up of completions, commitments, strategic allocations, both within and outside of Gloucester's administrative boundary, together with an urban capacity of 7,772 dwellings.

10. The most recent completion figure for dwellings within Gloucester's administrative boundary, set out in Exam 7a, is 5,070 dwellings since the beginning of the JCS plan period. The windfall allowance, of 64 dwellings per annum, has already been agreed as part of the examination of the adopted JCS of which the GCP forms the daughter document. The examination of the GCP is not the appropriate vehicle in which to reappraise this figure, which, over the remaining plan period, could bring forward a further 512 dwellings.

11. I have amended the total of the extant non-strategic commitments<sup>1</sup>. Therefore, taking into account the extant non-strategic commitments of 1769 dwellings, and including the 92 dwellings at the former oil storage depot, which is identified as a deliverable Brownfield Register Site around 300 dwellings would be required to be allocated, and delivered, within the GCP to meet the figure of 7,772 dwellings.

12. With the MMs discussed at the hearings, the plan allocates sites which could provide capacity for around 920 dwellings. Consequently, I conclude, even if a substantial proportion of the sites did not come forward for whatever reason, or no additional windfall housing was realised, I am confident the minimum capacity would have been provided for, and thus the plan would be consistent with Policy SP2 of the JCS.

13. However, this planned quantum of housing, including windfalls, falls short of the 14,359 homes referred to within Policy SP1 of the JCS.

14. Consequently, even though, with the MMs proposed, the Council has provided for a potential of 920 new dwellings, this still leaves, at the most optimistic interpretation of the Council's housing figures, a substantial gap between Gloucester's housing needs and the availability of suitable sites.

15. The JCS is predicated on their being limited opportunities for housing developments within Gloucester's urban area. I am aware that the keenly awaited, and oft delayed, review of the JCS is considered to be the appropriate arena in which to progress the identification of additional

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<sup>1</sup> I have amended the figure by removing the 9 dwellings whose permissions have expired or were in outline only. I have also removed the 36 units at land at Secunda Way where committee approval had been given. However, the S106 agreement had not been signed within the monitoring period, and therefore permission had not been granted.

strategic sites. Nonetheless, there is nothing within the JCS, subject to Policy SD10, which would preclude a more positive approach to the provision of additional housing within the City's administrative boundary, and which would go some way towards bridging the gap in housing provision which is set out within the JCS.

16. As it stands, whilst I am aware that the GCP together with the JCS will make up the development plan, and that with the MMs which I have requested there will be a clearer articulation of the relationship of the two plan documents, with specific reference to setting out how the policies of the GCP relate to specific policies within the JCS. Nonetheless, MMs are required to set out a positive approach to the bringing forward of sites for housing consistent with Policy SD10 of the JCS and Policy SP2 of the JCS. The urban capacity figure of 7,772 identified and planned for within the GCP, should be considered as a minimum figure, and reference made to the housing requirement of at least 14,359 dwellings in Policies SP1 and SP2 of the JCS.

17. This will require further references within the supporting text of the plan, and amendments to Policy A1 consistent with Paragraph 69 c) of the Framework and the section Making Effective Use of Land.

18. Gloucester's housing supply derives from sites inside and outside of its administrative boundary. The GCP's remit only applies to land located within the district. I have found that the Council has a marginal five-year supply of deliverable housing. However, in common with my colleagues, who have examined the Cheltenham Local Plan 2011- 2031, and the Tewkesbury Borough Plan 2011- 2031, both of which are subsidiary plans like the GCP, I consider that the ability to provide a five- year supply of deliverable housing on adoption is not essential to my examination of the plan.

#### Affordable Housing

19. Following on from my conclusion above regarding strategic policies, the affordable housing policy A2 should be deleted, and reliance placed on Policy SD12 of the JCS.

#### Gypsies and Travellers and Travelling Showpeople

20. Based on the Gypsy and Traveller Accommodation Assessment carried out in 2017, the supporting text to JCS Policy SD13 sets out the number of pitches and plots that are required in each district between 2016 and 2031, both for those that meet the definition in the Planning Policy for Traveller Sites, and for those that do not.

21. To satisfy the need identified in the 2017 study, a further two pitches are required for non-travelling Gypsies and Travellers, and 16 plots for Travelling Showpeople, 8 of which are travelling and the other 8 are unknown.

22. The plan as submitted does not include any allocations for either Gypsies and Travellers, or for Travelling Showpeople. A number of sites within Gloucester's administrative boundary have been considered for allocations for both Gypsy and Traveller sites and Travelling Showpeople. I am satisfied, from the detailed evidence contained within Ex19, that the Council has undertaken a rigorous search for appropriate sites, including those owned by public bodies. None of the sites put forward were appropriate, or available to be allocated, given flood risk and land instability matters, as well as odour issues associated with the Netheridge Waste Water Treatment Plant and ownership constraints.

23. However, I am also satisfied that the Council continues to actively work to bring forward sites, wherever possible. For example, it is exploring, with the Environment Agency and Homes England, whether land at Spinnaker Park could be made suitable and viable to provide land for Travelling Showpeople.

24. This situation is consistent with the Statement of Common Ground (SoCG8) between Gloucester and other authorities. This states that Gloucester is constrained, and that the other authorities will consider how to assist Gloucester in meeting its needs through Local Plan reviews.

25. A draft allocation, for 8 plots for Travelling Showpeople at Whaddon, has been made within the emerging Stroud Local Plan to help meet Gloucester's unmet needs. It is possible this allocation may not be included within the final adopted plan, given objections. Moreover, my understanding is that it is intended to be on land safeguarded for Gloucester's future needs. Nonetheless, it does demonstrate joint working to bring forward sites, albeit it does not immediately address the current requirement.

26. Ideally, the plan would have identified sufficient allocations to meet Gloucester's unmet needs, either through the GCP, as submitted or through sites in neighbouring districts. However, I am convinced the Council continues to actively work with its neighbours, as well as within its administrative boundary, to attempt to bring forward appropriate sites. Moreover, in the absence of suitable site allocations, Policies SD11 and SD13 of the JCS provide the appropriate policy mechanism to deliver additional sites for both travelling and non-travelling households.

### Site allocations

27. As submitted, it is unclear whether the text within boxes SA01-SA22 should be given the status of policy. Therefore, in order for the policies to be effective, a means should be found to differentiate between any background information which may be useful, and akin to a supplementary planning document, and the actual allocation.

28. Where site allocations are currently being developed, such as at Kings Quarter and land at Rea Lane, these should be removed as allocations.

29. In addition, Lynton Fields and Secunda Way should be deleted as site allocations, given that the landowners have stated that they do not consider that the land is available for the uses proposed.

### Next steps

30. Appendix 1 sets out a list of where I consider potential MMs should be made. This list includes MMs which have previously been discussed at the examination hearings, based on the Council's Schedule of Possible Modifications (CD010a), as well as those which are the result of further consideration.

31. In preparing the schedule of potential MMs for consultation, the Council should liaise with me, via the Programme Officer, to refine the detailed wording. Once I am happy with the wording, the potential MMs will then be the subject of formal public consultation.

32. The Policies Map is a geographic illustration of where the various policies in the GCP apply, and certain amendments are necessary to it for the geographic application of the policies to be justified and effective. Where the Policies Map needs to be amended from that submitted with the GCP, the changes should be published in a schedule alongside the MMs and also form part of the consultation. These changes include deleted or added sites and amended boundaries and are listed in the appendix.

33. To avoid any doubt, I am not inviting comments about the contents of this letter. There will be the opportunity, at the formal consultation stage, for those who wish to make representations on the potential main modifications.

34. I will take into account the responses to the consultation, before reaching my final conclusions, on the MMs required, in order that I can find the Plan sound. However, the general expectation is that issues

raised, following the consultation of the draft MMs, will be considered through the written representations process. Further hearing sessions will only be scheduled exceptionally.

35. My reasoning will be set out in my report to the Council which will accompany the schedule of main modifications.

36. Please consider whether any of the MMs will need to be subject to Sustainability Appraisal or whether the Habitats Regulations Assessment may need to be updated or an addendum produced to take them into account. If so, these documents should be published alongside the MMs, in due course, for the assistance of consultees.

37. A copy of this letter should be placed on the examination website.

Yours sincerely,

Louise Nurser

INSPECTOR

## **APPENDIX – OUTLINE OF MAIN MODIFICATIONS REQUIRED (IN PLAN ORDER)**

To ensure the plan is sound, the following main modifications are required. Numbers in brackets refer to the PM numbers in CD010a, the Council's suggested schedule of changes to the plan. Some editing and amendments will be required to these prior to formal consultation.

For the avoidance of doubt, all references to paragraph numbers relate to the plan as submitted.

### **MM1:** Relationship with the JCS

Make explicit that all the policies within the GCP are non- strategic (119). Requires consequential amendments throughout the plan eg para 1.5, and Appendix 6 of the GCP.

### **MM2:** review of JCS

1.4 set out up to date position.

### **MM3:** Resource efficiency and waste reduction

As per (004).

### **MM4:** Vision/ Key Principles

As per (005).

### **MM5:** Development needs and strategy

Insert paras 4.1 to 4.3, and 4.10- 4.16 after para 2.22.

Include reference to employment land and how it relates to the 192 ha identified within the JCS in SP1.

Amend the table at paragraph 4.10 as follows:

Strategic allocations (Tewkesbury Borough)	4331
Winnycroft Strategic allocation	620
Completed	5,070
Planning consents (commitments)	1769
Windfall allowance	512
Gloucester City Plan allocations	920
Other supply	92
TOTAL	13,314

Insert, 'at least' before 14,359 homes in first bullet point.

Set out how much employment land Gloucester City is required to provide over the JCS period.



Delete para. 4.13

Add new paragraph making explicit, notwithstanding the on-going review of the JCS, that the Council has a positive approach to bringing forward additional development consistent with the spatial strategy and policies of the JCS.

**MM6:** Housing

Delete last sentence of para 3.1.1

Add additional paragraph reiterating the positive approach to be taken by the Council in providing housing within the administrative boundary of Gloucester, in addition to the sites which are allocated to bring forward housing. (159)

Reference the housing requirement of at least 14,359 dwellings, as set out in Policy SP1 of the JCS and make explicit that the 7,772 urban capacity figure derived from the JCS is not a cap. (161)

Reference new appendices to update pages 109- 110 of the JCS to include an updated trajectory and five year housing land calculation. This should be based on Ex 11, other than the removal of the following allocated sites from the 5 year housing land supply: SA10 Former Fleece Hotel and Longsmith Street Car park (loss of 25 dwellings); SA16 Land off Lower Eastgate Street (loss of 15 dwellings) and SA18 Jordan's Brook House (loss of 10 dwellings). (76)

Table 2 should read as follows:

Small sites- 278 consisting of ((3 x 64) + 86))

Large sites- 1856

Large deliverable sites on the brownfield register- 92

City Plan allocations- 500

Strategic allocations in Tewkesbury Borough/ Gloucester City attributed to Gloucester 2,083

TOTAL 4809 units

Table 3 should read as follows:

Row k 4809

Row l 100%

Row m 5.00

Include table setting out 5 year housing supply for travelling showpeople.

Reference supportive approach to the provision of pitches and plots for gypsy and travellers and travelling showpeople. (160)

Include reference to the needs of gypsies and travellers, and travelling showpeople within paragraph 3.1.3.

**MM7:** Policy A1- Effective and efficient use of land and buildings

Insert housing into title.

Rephrase first line to be positively worded: 'Development for housing will be permitted where it makes effective and efficient use of land of buildings and: ...'.

Delete the word 'amenities' in the second bullet point and replace with 'living conditions', or similar.

Add a criterion to ensure that the development results in good living conditions for those occupying the development. (120)

Delete reference to 'saturation of intensified properties' within the policy and the supporting text.

**MM8:** New policy

Insert standalone Houses in Multiple Occupancy policy.

**MM9:** Policy A2- Affordable housing

Delete the policy and supporting text. (121)

Consequential amendment to Policy A5- delete text beginning, 'Where development falls...', underneath criterion 4).

**MM10:** Policy A4- Student accommodation

Amend criterion 1) to broaden policy to include students who attend block courses (121) and insert 'to the educational establishment' within criterion 4). (122)

**MM11:** Policy A5- Specialist housing

Delete 'Development proposals must be', and replace with 'Specialist housing will be permitted where...'.

Delete 'supported by a sustainable business model'.(126) Make consequential amendments to paragraphs 1.38 and 1.39.

Delete criterion 4) and provide criteria to determine whether a concentration of a particular form of specialist housing would lead to harm. (124)

**MM12:** Policy A6- Accessible and adaptable homes

Delete '50% of housing..' and replace with, '25% of housing...'.

Delete text after, 'wheelchair user dwellings'.

Include additional supporting text setting out the circumstances where category M4 (3) (2b) will be required. (129)

Set out within the supporting text the circumstances under which a specific site would be less suitable for M4(2) and M4(3) compliant dwellings. (10)

**MM13:** Policy A7- Self build and custom build homes

Remove reference to ,‘a minimum of 5% of the net developable area... as serviced plots’, and replace with, ‘5% of the serviced plots shall be offered.....’. (130)

Second paragraph insert, ‘or a shorter period if previously agreed with the Council’, after ‘a minimum of 12 months...’. Delete ‘a 12- month period’ and replace with ‘set marketing period’. (131)

**MM14:** Employment development, culture and tourism

Introduction- Insert text explaining that the JCS Update Note provided an indicative availability of land for offices, research & development, light and general industrial, storage and distribution of 7 ha.

Amend paragraph 3.3.3 to delete the allocations which have already been permitted and are being developed, or which are to be deleted.

**MM15:** Policy B1- Employment and skills plans

Split policy to reflect the difference between the construction and the operational stage of the development.

Remove second paragraph from policy text and include within supporting text. Include reference to the Construction Industry Training Board. (12)

**MM16:** Policy B2- Safeguarding employment sites and buildings

Remove reference to ‘B Class’ from the policy and supporting text. Replace with, ‘offices, research & development, light industrial, general industrial, storage and distribution’.

Replace ‘non- B class use’ with ‘other uses’.

Delete ‘and’ after criterion a) replace with ‘or’ and insert new criterion b) ‘Alternative local employment facilities of an equivalent standard can be provided without adversely impacting on the operation of the existing business and its accessibility to existing employees; and..’.

**MM17:** Policy B3- New employment development and intensification and improvements to existing employment land.

Remove reference to 'B Class' from the policy and supporting text.  
Replace with, 'offices, research & development, light industrial, general industrial, storage and distribution'.

Add additional text to criterion 3) and additional criterion 6). (14)

Delete, 'for example...'. (173)

Last paragraph, delete reference for 'non- B class uses' and replace with 'limited development outside these uses will be supported where...' Delete 'for B class uses'. (110a)

**MM18:** Policy B4- Development within and adjacent to Gloucester Docks and Canal.

Delete criterion 2. Replace with text as per (16a).

Criterion 3) delete 'environmental'.

Add additional text as per (17 & 18).

**MM19:** Policy B6- Protection of Public Houses

As per (174).

**MM20:** Policy C1- Active design and accessibility.

Remove reference to Active Design and Sport England. (132)

**MM21:** Policy C3- Public open space, playing fields and sports facilities

Amend as per (23.)

Remove reference to various strategies. (133)

**MM22:** Policy C4- Hot food takeaways

Criterion 2 as per (135). Delete reference to 'neighbouring' replace with 'nearby'.

Criterion 3 as per (25).

Criterion 5 as per (112).

Criterion 6 as per (136) make consequential amendment to supporting text.

Amend supporting text as per (26).

**MM23:** Policy C6- Cordon Sanitaire

Reference policy WCS11 of the Gloucestershire Waste Core Strategy 2012.

Include additional policy text to set out the circumstances under which planning permission would be granted for sensitive uses that could potentially constrain the operation of the Netheridge Sewage Works.

Delete second sentence in para 3.31 of supporting text.

Include supporting text which explains that circumstances may alter over the plan period, through the intensification of waste facilities at the site, or a reduction in odour nuisance, through the introduction of new technologies. Consequently, the cordon sanitaire should be treated as a trigger, to ensure that any development which could be adversely affected by odour is able to take place, without impacting on the operation of the Sewage works, or without resulting in unacceptable living conditions.

**MM24:** Policy C8- Changing Places Toilets

Amend policy as per (113) (138) and (139).

**MM25:** Policy D1- Historic Environment

Amend policy as per (36A).

**MM26:** Policy D2- Non-designated heritage assets

Amend policy as per (37A).

**MM27:** Policy D4- Shopfronts, shutters and signs

Move to Design section.

Amend policy as per (140-142). Ensure policy is written in a positive manner and is not overly prescriptive in terms of design or materials.

Amend supporting text to be more flexible.

**MM28:** Natural Environment- Introduction and context

As per (41), (42a).

**MM29:** Policy E1- Landscape character and sensitivity

Delete the policy.

**MM30:** Policy E2- Biodiversity and geodiversity

Delete reference to the Gloucestershire Local Nature Partnership.

**MM31:** Policy E3- Nature Recovery Area

Delete reference to the Gloucestershire Local Nature Partnership.

**MM32:** Policy E4- Trees, woodlands and hedgerows

Move E4 to end of chapter.  
Amend as per (44, 45a, &146).  
Delete last sentence in paragraph 4.5.8 of the supporting text.  
Insert text referencing the requirement for developments to provide tree lined streets, as per the Council's response to the 2021 version of the Framework.  
Remove last sentence of penultimate paragraph and reference within supporting text.

**MM33:** Policy E5- Green Infrastructure: Building with Nature

Reword policy to ensure that the objective of the policy is that green infrastructure is designed to meet established recognisable standards including those within the National Design Guide.

Make consequential amendments to the supporting text.  
As per (46 & 114).

**MM34:** Policy E6- Flooding, sustainable drainage and wastewater

As per (147, 49a, 50, 51, 52, 53, & 54).

**MM35:** Policy E7- Renewable energy potential of the River Severn and canal

As per (55).

**MM36:** Policy F1- Materials and finishes

Amend as per (149 and 150).

**MM37:** Policy F2- Landscape and Planting

Amend as per (149 and 150).

Amend paragraphs 3.6.7 and 3.6.8 to be less prescriptive.

**MM38:** Policy F3- Community Safety

Amend as per (60 and 61).

Amend as per 152 and insert 'cycle routes' after footpaths.

**MM39:** Policy F5- Open Plan Estates

Amend as per (62).

**MM40:** Policy F6- Nationally Described Space Standards

Insert (or any future successor) into policy.

Reference exceptions where development would be acceptable where it does not meet the standards.

Require reference to transitional arrangements within supporting text.

**MM41:** Introduction to Chapter G: Sustainable living, transport and infrastructure

Insert as per (116) except, delete text after 'Waste Minimisation Statement' in new para 3.7.7 and delete text in new para 3.7.8, 'A proposals demonstrations....(and future iterations).

Amend fourth bullet point to delete reference with 'Building with Nature'.

Delete all of para 3.7.9 after, 'Energy Strategy 2019'. Insert reference to 'The Gloucestershire Climate Change Strategy 2019 and The Gloucester Climate Change Strategy and future iterations'.

**MM42:** Policy G1- Sustainable transport

Remove references to other documents that elevates them to development plan status (153) and include within supporting text if necessary.

Remove references that suggest that GCP is not the decision maker.

Rewrite policy to set out sustainable transport criteria against which future development proposals will be determined.

Include text as per (78).

**MM43:** Policy G2- Charging infrastructure for electric vehicles

Amend as per (69).

Amend as per (70) remove references to socket from policy.

Define what is meant by a rapid charger.

In second paragraph replace 'properties' with 'developments'. Delete text after 'strongly encouraged'.

Delete paragraph 3.7.15 of the supporting text.

**MM44:** Policy G3- Cycling

Amend as per (71 & 72 & 155).

Delete first part of second paragraph up to and including, 'other partners'.

Include additional policy text reflecting the requirement for all development to provide safe and secure access by cycle.

Ensure reference to Local Transport Plan is removed from policy text.

**MM45:** Policy G4- Walking

Remove reference to the County Council and other partners from the policy text.

Make explicit that pedestrians are the top of the road hierarchy for all developments.

**MM46:** Policy G6- Telecommunications infrastructure

Amend as per (117 and 157).

Remove reference to the County Council and other partners from the policy text.

**MM47:** Policy G8- Review mechanism

Amend as per (75).

**MM48:** Site allocations

Provide new policy within a table setting out the land use allocations of each individual site.

Cross reference with allocation statements providing further detail to inform the determination of any application. (162)

Clarify that the indicative capacity for residential development should not be treated as a ceiling. (161)

**MM49:** Site allocations- Housing

SA03 Former Prospect House, increase residential capacity to 60 dwellings. (83)

SA04 Former Wessex House, ditto to 40 dwellings. (164)

SA05 Land at Great Western sidings, ditto to 300 dwellings. (165)

SA18 Jordan's House, reduce residential capacity to 10 dwellings. (168)

**MM50:** Site allocations- Commitments

Delete SA08: King's Quarter.

Delete SA12 Land at Rea Lane, Hempsted.

**MM51:** Site allocations- Employment

Delete SA07: Lynton Fields, Land east of Waterwells Business Park.  
Delete SA22: land adjacent to Secunda Way.

**MM52:** Site allocations- Mineral consultation areas



Include reference to MCA within accompanying site allocation statements as per (79, 80, 81, 84, 89, 95, 99, & 101).

**MM53:** Site allocations- Mineral consultation areas and land contamination

As per (90).

**MM54:** Site allocations- Mineral consultation areas and mitigation measures

As per (85, 96, & 100).

**MM55:** Site allocations- SA03 – Former Prospect House, 67 – 69 London Road

As per (82 & 163)

**MM56:** Site allocations- SA09 – Former Quayside House, Blackfriars

As per (88).

**MM57:** Site allocation- SA10 – Former Fleece Hotel and Longsmith Street Car park

As per (166).

**MM58:** Site allocation- SA11 – Land rear of St Oswalds Retail Park

As per (91).

**MM59:** Site allocation- SA15 – Land South West of Winnycroft Allocation

As per (94).

**MM60:** Site allocation- SA16 – Land off Lower Eastgate Street

Delete requirement for green roofs (167).

**MM61:** Site allocation- SA21 – Part of West Quay, The Docks

As per (169).

## **PLAN WIDE**

**MM62:** Relationship with other development plans

Reference and set out how each policy relates to the relevant policy in the JCS (172), or the Gloucestershire Waste Core Strategy 2012, or the Gloucestershire Minerals Local Plan 2018- 2032 (GMLP).

**MM63:** Other guidance

Remove reference to external studies, guidance or policy documents from the policy text.

**MM64:** National Planning Policy Framework 2021

Update any references to the previous version of the National Planning Policy Framework to the 2021 revision.

**MM65:** Monitoring framework

As per (177).

**MM66:** Superseded policies

Clarify that all policies from the 1983 Gloucester Local Plan have been superseded by the GCP with the exception of the retail policies, as the GCP does not have any retail policies, relying on the policies of the JCS.

**POLICIES MAP**

The following amendments are necessary to the submitted Policies Map for the geographic application of the policies in the GCP to be justified and effective.

As per (105, 178, 179 and 180, apart from SA22 which is to be deleted).

Gloucester City Plan  
Main Modifications Schedule  
April 2022

The Main Modifications below are those the Inspector considers necessary to make the plan sound. They are expressed either in the conventional tracked-changes form of strikethrough for deletions and bold underlining for additions of text. In the interests of being succinct, only those paragraphs that have been amended are shown within this schedule, i.e. unchanged text paragraphs will not be shown below.

Reference	Section / paragraph of submitted plan	Main Modification				
MM1	Relationship with the JCS  Paragraph 1.3	<p>Joint Core Strategy</p> <p>1.3 The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. It is a <u>the</u> strategic plan that covers a twenty-year period between 2011 and 2031, addressing cross-boundary planning matters including housing need for each of the local authorities, the need for employment land and strategic site allocations. <b><u>The JCS provides strategic policies for the local authorities, in accordance with paragraphs 20 – 23 of the NPPF. The district plans provide non-strategic policies, which for Gloucester City is the Gloucester City Plan.</u></b></p>				
MM1	Relationship with the JCS – Appendix 6  Paragraph 4.1	<p><del>6</del><b>7</b>. STRATEGIC POLICIES AND PROPOSALS IN THE JOINT CORE STRATEGY AND GLOUCESTER CITY PLAN</p> <p><del>4.1</del> <b>7.1</b> For Gloucester the majority of strategic policies are contained within the JCS. A full list of strategic and non-strategic policies contained within the development plan as a whole are as follows:</p> <p>Joint Core Strategy 2011 – 2031 – Strategic Policies</p> <table border="1"> <tr> <td>Paragraph 2.2 – Vision</td> </tr> <tr> <td>Paragraph 2.35 – Strategic Objectives 1 – 9</td> </tr> <tr> <td>Policy SP1 – The Need for New Development</td> </tr> <tr> <td>Policy SP2 – Distribution of New Development</td> </tr> </table>	Paragraph 2.2 – Vision	Paragraph 2.35 – Strategic Objectives 1 – 9	Policy SP1 – The Need for New Development	Policy SP2 – Distribution of New Development
Paragraph 2.2 – Vision						
Paragraph 2.35 – Strategic Objectives 1 – 9						
Policy SP1 – The Need for New Development						
Policy SP2 – Distribution of New Development						

			Policy SD1 – Employment
			Policy SD2 – Retail and City/Town Centres
			Policy SD3 – Sustainable Design and Construction
			Policy SD4 – Design
			Policy SD5 – Green Belt
			Policy SD6 – Landscape
			Policy SD7 – AONB
			Policy SD8 – Historic Environment
			Policy SD9 – Biodiversity and Geodiversity
			Policy SD10 – Residential Development
			Policy SD11 – Housing Mix and Standards
			Policy SD12 – Affordable Housing
			Policy SD13 – GTTS
			Policy SD14 – Health and Environmental Quality
			Policy SA1 – Strategic Allocations
			Policy INF1 – Transport Network
			Policy INF2 – Flood Risk Management
			Policy INF3 – Green Infrastructure
			Policy INF4 – Social and Community Infrastructure
			Policy INF5 – Renewable Energy and Low Carbon Energy Development
			Policy INF6 – Infrastructure Delivery
			Policy INF7 – Developer Contributions
			Policy SA1 – Strategic Allocations
			Gloucester City Plan 2011 – 2031 – <b>Non</b> -strategic Policies
			Vision
			Key Principles
			Policy A1: Effective and efficient use of <b>housing</b> , land and buildings
			Policy A2: Affordable housing <b>Houses in Multiple Occupation</b>
			Policy A3: Estate regeneration
			Policy A4: Student accommodation

			Policy A5: Specialist housing
			Policy A6: Accessible and adaptable homes
			Policy A7: Self-build and custom-build homes
			Policy A8: Static caravan sites
			Policy A9: Extensions to existing dwellings
			Policy A10: Annexes to existing dwellings
			Policy B1: Employment and skills plans
			Policy B2: Safeguarding employment sites
			Policy B3: New employment development and intensification and improvements to existing employment land
			Policy B4: Development within and adjacent to Gloucester Docks and Canal
			Policy B5: Tourism and culture
			Policy B6: Protection of public houses
			Policy C1: Active design and accessibility
			Policy C2: Allotments
			Policy C3: Open spaces, playing fields and sports facilities
			Policy C4: Hot food takeaways
			Policy C5: Air quality
			Policy C6: Cordon Sanitaire: <b>Netheridge Sewage Treatment Works</b>
			Policy C7: Fall prevention from taller buildings
			Policy C8: Changing Places Toilets
			Policy D1: Historic Environment
			Policy D2: Non-designated heritage assets
			Policy D3: Recording and advancing understanding of heritage assets
			Policy D4: Views of the Cathedral and historic places of worship
			<del>Policy E1: Landscape character and sensitivity</del>
			Policy E2 <u>1</u> : Biodiversity and geodiversity
			Policy E3 <u>2</u> : Nature Recovery Area
			Policy E4 <u>3</u> : Green/blue infrastructure
			Policy E5 <u>4</u> : Flooding, sustainable drainage and wastewater
			Policy E6 <u>5</u> : Renewable energy potential of the River Severn and Canal
			Policy E7 <u>6</u> : Development affecting Cotswold Beechwoods Special Area of Conservation

		<p>Policy <del>D5</del><u>E7</u>: Trees, woodlands and hedgerows</p> <p>Policy F1: Materials and finishes</p> <p>Policy F2: Landscape and planting</p> <p>Policy F3: Community safety</p> <p>Policy F4: Gulls</p> <p>Policy F5: Open plan estates</p> <p>Policy F6: Nationally Described Space Standards</p> <p>Policy F7: Shopfronts, shutters and signs</p> <p>Policy G1: Sustainable transport <b>and parking</b></p> <p>Policy <del>G2</del>: Charging infrastructure for electric vehicles</p> <p>Policy <del>G3</del><u>2</u>: Cycling</p> <p>Policy <del>G4</del><u>3</u>: Walking</p> <p>Policy <del>G5</del><u>4</u>: Broadband connectivity</p> <p>Policy <del>G6</del><u>5</u>: Telecommunications infrastructure</p> <p>Policy <del>G7</del><u>6</u>: Water efficiency</p> <p>Policy <del>G8</del><u>7</u>: Review mechanism</p> <p><b>Policy SA: Site allocations</b></p>						
		<p><b>Article 4 Directions</b></p> <p>7.2 Gloucester currently has two Article 4 directions, at St Michaels Square and Southgate Street Conservation Area. Full details can be found online <a href="#">Article 4 Direction - Gloucester City Council</a></p> <p>Gloucester City Plan — Strategic Policies</p>						
		<table border="1"> <tr> <td>Vision</td> </tr> <tr> <td>Key Principles</td> </tr> <tr> <td>Policy A2: Affordable housing</td> </tr> <tr> <td>Policy A6: Accessible and adaptable homes</td> </tr> <tr> <td>Policy B2: Safeguarding employment sites</td> </tr> <tr> <td>Policy B3: New employment development and intensification and improvements to existing employment land</td> </tr> </table>	Vision	Key Principles	Policy A2: Affordable housing	Policy A6: Accessible and adaptable homes	Policy B2: Safeguarding employment sites	Policy B3: New employment development and intensification and improvements to existing employment land
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Key Principles								
Policy A2: Affordable housing								
Policy A6: Accessible and adaptable homes								
Policy B2: Safeguarding employment sites								
Policy B3: New employment development and intensification and improvements to existing employment land								

			Policy C6: Cordon Sanitaire
			Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation
			Policy F6: Nationally Described Space Standards
			Policy G8: Review mechanism
			<b>Site allocations SA01 to SA22</b>
			Policy SA01: Land at the Wheatridge
			Policy SA02: Land at Barnwood Manor
			Policy SA03: Former Prospect House, 67 – 69 London Road
			Policy SA04: Former Wessex House, Great Western Road
			Policy SA05: Land at Great Western Road Sidings
			Policy SA06: Blackbridge Sports and Community Hub
			Policy SA07: Lynton Fields, Land East of Waterwells Business Park
			Policy SA08: King’s Quarter
			Policy SA09: Former Quayside House, Blackfriars
			Policy SA10: Former Fleece Hotel & Longsmith Street Car Park
			Policy SA11: Land rear of St Oswalds Retail Park
			Policy SA12: Land at Rea Lane, Hempsted
			Policy SA13: Former Colwell Youth & Community Centre
			Policy SA14: Land off New Dawn View
			Policy SA15: Land South of Winnycroft Allocation
			Policy SA16: Land off Lower Eastgate Street
			Policy SA17: Land South of Triangle Park (Southern Railway Triangle)
			Policy SA18: Jordan’s Brook House
			Policy SA19: Land off Myers Road
			Policy SA20: White City Replacement Community Facility
			Policy SA21: Part of West Quay, The Docks
			Policy SA22: Land adjacent to Secunda Way Industrial Estate
			 Gloucester City Plan – Non-Strategic Policies
			Policy A1: Effective and efficient use of land and buildings
			Policy A3: Estate regeneration

			Policy A4: Student accommodation
			Policy A5: Specialist housing
			Policy A7: Self-build and custom-build homes
			Policy A8: Static caravan sites
			Policy A9: Extensions to existing dwellings
			Policy A10: Annexes to existing dwellings
			Policy B1: Employment and skills plans
			Policy B4: Development within and adjacent to Gloucester Docks and Canal
			Policy B5: Tourism and culture
			Policy B6: Protection of public houses
			Policy C1: Active design and accessibility
			Policy C2: Allotments
			Policy C3: Open spaces, playing fields and sports facilities
			Policy C4: Hot food takeaways
			Policy C5: Air quality
			Policy C7: Fall prevention from taller buildings
			Policy C8: Changing Places Toilets
			Policy D1: Historic Environment
			Policy D2: Non-designated heritage assets
			Policy D3: Recording and advancing understanding of heritage assets
			Policy D4: Shopfronts, shutters and signs
			Policy D5: Views of the Cathedral and historic places of worship
			Policy E1: Biodiversity and geodiversity
			Policy E2: Nature Recovery Area
			Policy E3: Green/blue infrastructure
			Policy E4: Flooding, sustainable drainage and wastewater
			Policy E5: Renewable energy potential of the River Severn and Canal
			Policy E6: Development affecting Cotswold Beechwoods Special Area of Conservation
			Policy E7: Trees, woodlands and hedgerows
			Policy F1: Materials and finishes
			Policy F2: Landscape and planting
			Policy F3: Community safety



			<p>Policy F4: Gulls</p> <p>Policy F5: Open plan estates</p> <p>Policy G1: Sustainable transport</p> <p>Policy G2: Charging infrastructure for electric vehicles</p> <p>Policy G3: Cycling</p> <p>Policy G4: Walking</p> <p>Policy G5: Broadband connectivity</p> <p>Policy G6: Telecommunications infrastructure</p> <p>Policy G7: Water efficiency</p>
MM2	Review of JCS Paragraph 1.5	1.5	<p>The review has now begun and an ‘Issues and Options’ consultation was held between November 2018 and January 2019. This includes a focused and accelerated review of the retail and city/town-centre policies which are already progressing. <b><u>The next stage will be the Draft JCS Review (Regulation 18). At the time of writing the programme is being finalised, but it is anticipated the draft plan will be considered by the authorities by the end of 2022, followed by public consultation.</u></b> Further information is available on the JCS website at <a href="http://www.jointcorestrategy.org">www.jointcorestrategy.org</a>.</p>
MM3	Resource efficiency and waste reduction Paragraph 2.16	2.16	<p>Climate change is the greatest long-term challenge facing human development. The Gloucester Climate Change Strategy (2010) identifies that even in the ‘best-case scenario’ Gloucester is likely to experience winters up to 42% wetter, more frequent flooding, worsening summer air pollution, drier summers and loss of wildlife habitats and species. Planning can make a major positive contribution to tackling climate change by shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as weather events and flood risk. The JCS and GCP contain policies that will require new development to be designed in ways that promote the <b><i>efficient use of resources and waste reduction, greater</i></b> use of sustainable transport, uplift in the generation of renewable energy, provide tree planting, create and connect to public open spaces and multi-functional green infrastructure, make use of Sustainable Urban Drainage Systems and opportunities to improve flood risk and manage it better, and to deliver improvements and net gains to biodiversity.</p>
MM4	Vision and Key Principles	Vision	<p>New development will be built to the highest possible standard of design, focused on protecting the quality and local distinctiveness of the city, whilst responding to <b><u>and building resilience and adaptability to</u></b> the implications of climate change.</p>

		<p>Key Principle 1</p> <p>Ensure that new development contributes to the delivery of a transforming, <b>low carbon</b> city which <b>is resilient and adaptable to a changing climate</b>, brings regeneration benefits, promotes sustainable development, <b>incorporating measures to reduce waste, and</b> makes the most efficient use of brownfield land and the reuse of vacant <b>and underused</b> buildings and space.</p>
MM5(A)	<p>Development needs and strategy</p> <p>Paragraphs 4.1 – 4.3, 4.10 – 4.12</p> <p>New paragraph</p>	<p><b><u>3. DEVELOPMENT NEEDS AND STRATEGY</u></b></p> <p><b>4.1 3.1</b> The NPPF requires that local authorities should positively plan to deliver development needs. For Gloucester, these development needs are set by the strategic level Joint Core Strategy (JCS), which was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council <b>in December 2017</b>. Between 2011 and 2031, the development needs for <b>Gloucester</b> are <b>set out by the following JCS policies</b>.</p> <ul style="list-style-type: none"> <li>• Policy SP1 – The need for new development’: <b>at least</b> 14,359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, <b>at least</b> 192 hectares of B-Class employment land to support approximately 39,500 new jobs.</li> <li>• Policy SD2 – Retail and City / Town Centres’: 45,500 sq m (net) of comparison goods retail floorspace and 3,600 sq m (net) of convenience goods floorspace.</li> <li>• Policy SD13 – ‘Gypsies, Travellers and Travelling Showpeople’: This policy sets out a criteria-based policy for the assessment of planning applications for these communities. The supporting text sets out accommodation needs arising from the Gloucestershire Gypsy and Traveller Accommodation Assessment (2016<del>7</del>). For Gloucester <b>City</b>, it identifies a need of two Gypsy pitches and 16 Travelling Showpeople plots arising from Gloucester’s existing communities. In relation to transit pitches for those members of the community travelling through the area, the GTAA recommends that there is no need for such provision and that the authorities should instead consider the use of ‘temporary tolerated stopping places’.</li> </ul> <p><b>4.2 3.2</b> Policy SP2 ‘Distribution of new development’ of the JCS, sets out the delivery strategy, which is the delivery of development that maximises urban capacity, alongside the identification of urban extensions (strategic allocations) to the main urban areas of Gloucester and Cheltenham. This is so as to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to</p>

balance employment and housing needs, and provide new development close to where it is needed and where it can benefit from the existing and enhanced sustainable transport network.

**4.3 3.3** Most strategic allocations are in Tewkesbury Borough; this reflects the fact that Gloucester has a very limited land supply and in order to meet development needs, it has been necessary to work in partnership with Tewkesbury Borough Council to identify urban extensions within that local authority area. One strategic allocation, Winnycroft, is located within the administrative area of Gloucester City.

Housing

**4.10 3.4** Gloucester city's housing delivery position, as of 31st March 2019 **2021**, is summarised in the table below.

	Gloucester City	Tewkesbury Borough
JCS Strategic allocations (Tewkesbury Borough)	-	<b>4,895,331</b>
Winnycroft Strategic allocation (Gloucester City)	620	-
Completed	<b>3,993,070</b>	
Planning consents ( <b>commitments</b> )	<b>2,339,769</b>	-
'Windfall allowance'	<b>640,512</b>	-
Gloucester City Plan allocations	<b>972,920</b>	-
<b>Other supply</b>	<b>92</b>	-
<b>TOTAL</b>		<b>13,459,131</b>

**4.11 3.5** Further information is available from the housing monitoring report (September 2019 **2021**), available to download from the City Council's website.

**4.12 3.6** Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to 900 **1,043 dwellings as of the end of the monitoring period to March 2021**. This **A** shortfall is acknowledged and accepted within the JCS. Policy REV01 'Gloucester and Tewkesbury Housing Supply Review' states the need for an immediate review of housing supply and that 'The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities'.

		<p>The JCS Review has already commenced with an ‘issues and options’ consultation taking place during November 2018 and January 2019. Further information is available from the JCS website.</p> <p><b><u>3.7 Further details of Gloucester City’s housing trajectory and five-year housing land supply is provided at Appendix 1.</u></b></p>
MM5(B)	<p>Development needs and strategy</p> <p>Paragraph 4.14</p>	<p>Employment land</p> <p>4.14 <b><u>3.8 Employment development is considered on a JCS-wide basis. Across the JCS area, through both strategic and non-strategic allocations, provision has been made for at least 192 hectares of traditional employment land. At the JCS examination, evidence was provided to demonstrate that there was a capacity of 7ha of employment land in the city (1). The GCP allocates</u></b> From an employment perspective, a total of 14.6 <b><u>8.1</u></b> hectares is allocated, either as 100% ‘B Class’ employment sites or as part of wider mixed-used schemes. <b><u>Together with recent commitments, such as those at King’s Quarter, there is the opportunity for a substantial amount of floorspace to be delivered over the plan period.</u></b> Together, they will deliver a substantial amount of employment floorspace. Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p> <p><b><u>(1) EXAM180 ‘JCS Economic Update Note’</u></b></p>
MM5(C)	<p>Development needs and strategy</p> <p>Paragraph 4.16</p>	<p>Gypsy and traveller communities</p> <p>4.16 <b><u>3.10</u></b> As identified above, there is a need for additional permanent Gypsy and Travelling Showpeople accommodation to meet the needs of Gloucester’s existing communities. <b><u>The Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 identifies an overall need for two Gypsy/Traveller pitches and 16 Travelling Showpeople plots, between 2016 and 2031.</u></b> The City Council has reviewed all possible site opportunities, including their own land assets and those submitted through ‘call for sites’, and it has been concluded there are none that are suitable, available and viable within the city. A request has been submitted to all neighbouring authorities, under the ‘duty to cooperate’, for help</p>

		<p>in identifying deliverable sites. <b><u>Further details of the five-year housing land supply requirement for Travelling Showpeople plots is provided at Appendix 1.</u></b></p> <p><b><u>3.11 Notwithstanding this, Policy SD13 ‘Gypsies, Travellers and Travelling Showpeople’ and Policy SD11 ‘Housing mix and standards’ set out a positive policy mechanism to deliver sites for both travelling and non-travelling households, where consistent with other policies in the Development Plan.</u></b></p>
MM5(D)	<p>Development needs and strategy</p> <p>New paragraph</p>	<p><b><u>Windfall development</u></b></p> <p><b><u>3.12 The JCS Review is underway. This will consider the quantum of development required and the overarching spatial strategy moving forward, including the identification of development sites. Notwithstanding this, in the context of Gloucester’s current development requirements as set out in the adopted JCS, relating to general housing needs, employment land and accommodation for Gypsies, Travellers and Travelling Showpeople, the City Council will take a positive approach to proposals for additional development over and above those allocated within the development plan where they are consistent with the development strategy of the JCS and policies of the Development Plan as a whole.</u></b></p>
MM6(A)	<p>Housing</p> <p>Paragraphs 3.1.1 – 3.1.4.</p> <p>New paragraphs</p>	<p>Introduction and context</p> <p><del>3.1.1</del> <b><u>4.1.1</u></b> There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucester is certainly not immune from this major social and economic issue. Gloucester’s population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighbouring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city’s needs. <del>Further information on the city’s housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.</del></p> <p><b><u>4.1.2 Policy SP1 ‘The need for new development’ of the adopted JCS sets a housing requirement of at least 14,359 new homes over the plan period of 2011 – 2031. At least 13,287 are to be provided within the Gloucester City administrative boundary. Table SP2b of the JCS apportions the district capacity in the urban area at 7,772 homes, taken from different sources of supply at Table SP2a. This figure does not</u></b></p>

		<p><u>represent a cap on capacity and, as highlighted elsewhere in the GCP, the City Council takes a positive approach to development proposals, where consistent with the development strategy of the JCS and policies contained in the Development Plan as a whole.</u></p> <p><b>4.1.3</b> <u>The supporting text to Policy SD13 ‘Gypsies, Travellers and Travelling Showpeople’ identify needs relating to the Gypsy, Traveller and Travelling Showpeople community. At the time of writing, there are no deliverable sites for these need in Gloucester City. However, the Council continues to explore opportunities within its administrative area and work proactively with neighbouring local authorities to meet these needs. Furthermore, Policy SD13 and Policy SD11 ‘Housing mix and standards’ are enabling policies that support the deliver suitable sites, where in accordance with the development plan, should they come forward as windfall proposals.</u></p> <p><b>4.1.4</b> <u>Appendix 1 provides the housing trajectory and five-year housing land supply calculation as of the end of March 2021. In addition, it appears from limited evidence available (1) that as of 1 April 2022, the Council will be able to demonstrate a five-year supply of deliverable housing on adoption of the GCP.</u></p> <p><del>3.1.2</del> <b>4.1.5</b> When people have decent, affordable and secure housing this acts as a foundation for healthy and happy communities and stable family lives. Ideally good housing needs to be close to schools, healthcare and public transport links. Good housing improves environmental and economic wellbeing and helps to create stronger communities and places that can act as a draw to investment and skilled workers.</p> <p><del>3.1.3</del> <b>4.1.6</b> The policies in this chapter specifically reflect City Plan Key Principles 1, 3, 6 and 10. The GCP aims to create a policy framework whereby the needs of all types of households are met. The plan seeks to support families, single people, students, self-builders, the elderly, and those with disabilities or particular special needs, <b>Gypsies, Travellers and Travelling Showpeople</b>. Based on the NPPF, Policy A1 provides the overall driver which seeks to use land and buildings effectively and efficiently. If this is achieved, then there is a greater prospect of a. achieving higher densities which will increase the supply of homes and b. protecting and preserving sites which need to be protected for their natural environmental value.</p> <p><del>3.1.4</del> <b>4.1.7</b> Further information in relation to policies in this section is provided in the Housing Background Paper, available to download from the City Council’s website.</p>
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**(1) In December 2021 the City Council was subject to a cyber incident that removed access to systems used to manage planning applications, and which records information necessary to complete monitoring and a five-year supply calculation. The Council has undertaken a headline assessment, using predicted figures in the existing housing trajectory, and will prepare a full statement in due course.**

MM6(B)

Housing

New appendix

**Appendix 1 – Housing trajectory and five-year housing land supply calculation**

**Housing (bricks and mortar)**

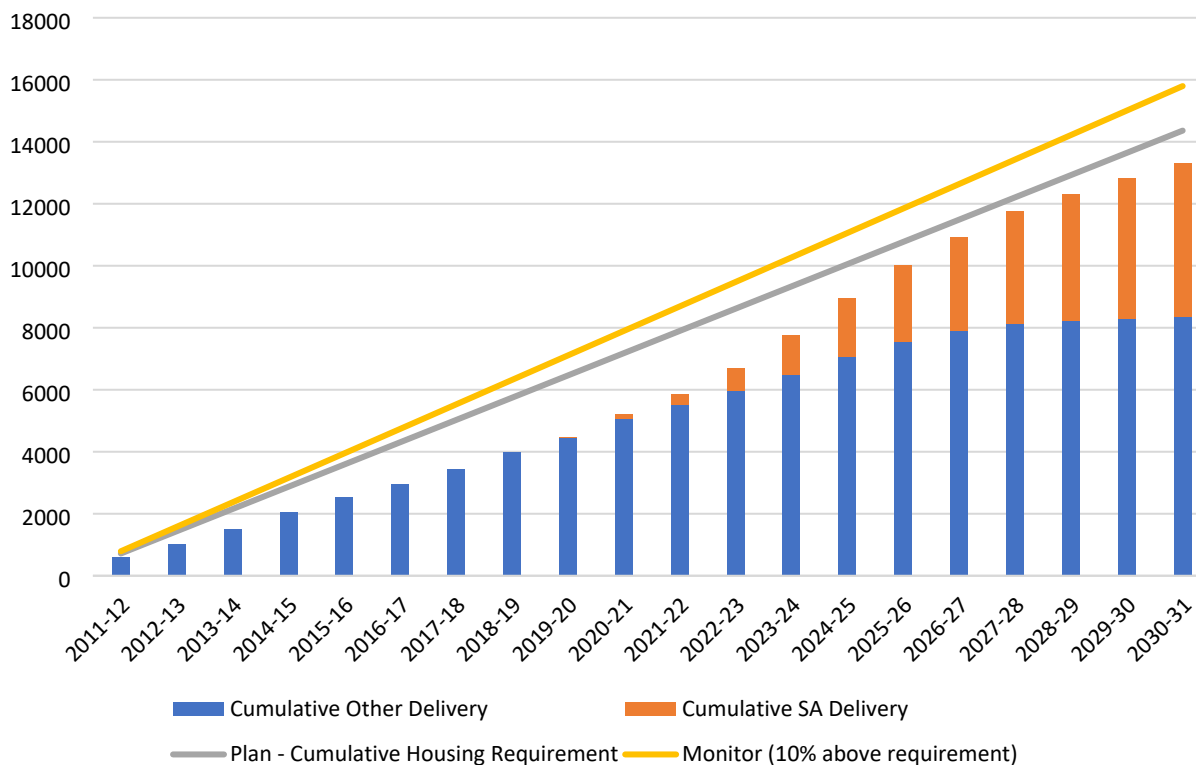
**The following tables and graph provide details of Gloucester City’s housing trajectory and five-year supply calculation as of 31<sup>st</sup> March 2021. It updates that provided at paragraph 7.1.34 of the adopted Joint Core Strategy (pages 109 – 110).**

<u>Year</u>	<u>Other Delivery</u>	<u>SA Delivery</u>	<u>Total Projected Completions</u>	<u>Cumulative Completions</u>	<u>Plan – Annual Housing Requirement</u>	<u>Plan – Cumulative Housing Requirement</u>	<u>Monitor – No of dwellings above or below Cumulative Requirement</u>
<u>2011-12</u>	<u>593</u>	<u>0</u>	<u>593</u>	<u>593</u>	<u>718</u>	<u>718</u>	<u>-125</u>
<u>2012-13</u>	<u>430</u>	<u>0</u>	<u>430</u>	<u>1023</u>	<u>718</u>	<u>1436</u>	<u>-413</u>
<u>2013-14</u>	<u>476</u>	<u>0</u>	<u>476</u>	<u>1499</u>	<u>718</u>	<u>2154</u>	<u>-655</u>
<u>2014-15</u>	<u>554</u>	<u>0</u>	<u>554</u>	<u>2053</u>	<u>718</u>	<u>2872</u>	<u>-819</u>
<u>2015-16</u>	<u>470</u>	<u>0</u>	<u>470</u>	<u>2523</u>	<u>718</u>	<u>3590</u>	<u>-1067</u>
<u>2016-17</u>	<u>439</u>	<u>0</u>	<u>439</u>	<u>2962</u>	<u>718</u>	<u>4308</u>	<u>-1346</u>
<u>2017-18</u>	<u>487</u>	<u>0</u>	<u>487</u>	<u>3449</u>	<u>718</u>	<u>5026</u>	<u>-1577</u>
<u>2018-19</u>	<u>544</u>	<u>0</u>	<u>544</u>	<u>3993</u>	<u>718</u>	<u>5744</u>	<u>-1751</u>

<u>2019-20</u>	<u>467</u>	<u>21</u>	<u>488</u>	<u>4481</u>	<u>718</u>	<u>6462</u>	<u>-1981</u>
<u>2020-21</u>	<u>610</u>	<u>114</u>	<u>724</u>	<u>5205</u>	<u>718</u>	<u>7180</u>	<u>-1975</u>
<u>2021-22</u>	<u>440</u>	<u>211</u>	<u>651</u>	<u>5856</u>	<u>718</u>	<u>7898</u>	<u>-2042</u>
<u>2022-23</u>	<u>454</u>	<u>388</u>	<u>842</u>	<u>6698</u>	<u>718</u>	<u>8616</u>	<u>-1918</u>
<u>2023-24</u>	<u>515</u>	<u>540</u>	<u>1055</u>	<u>7753</u>	<u>718</u>	<u>9334</u>	<u>-1581</u>
<u>2024-25</u>	<u>572</u>	<u>609</u>	<u>1181</u>	<u>8934</u>	<u>718</u>	<u>10052</u>	<u>-1118</u>
<u>2025-26</u>	<u>495</u>	<u>585</u>	<u>1080</u>	<u>10014</u>	<u>718</u>	<u>10770</u>	<u>-756</u>
<u>2026-27</u>	<u>334</u>	<u>564</u>	<u>898</u>	<u>10912</u>	<u>718</u>	<u>11488</u>	<u>-576</u>
<u>2027-28</u>	<u>241</u>	<u>595</u>	<u>836</u>	<u>11748</u>	<u>718</u>	<u>12206</u>	<u>-458</u>
<u>2028-29</u>	<u>114</u>	<u>450</u>	<u>564</u>	<u>12312</u>	<u>718</u>	<u>12924</u>	<u>-612</u>
<u>2029-30</u>	<u>64</u>	<u>450</u>	<u>514</u>	<u>12826</u>	<u>718</u>	<u>13642</u>	<u>-816</u>
<u>2030-31</u>	<u>64</u>	<u>424</u>	<u>488</u>	<u>13314</u>	<u>718</u>	<u>14360</u>	<u>-1046</u>



**Gloucester City - Cumulative Housing Delivery against Requirement**  
**Update of JCS table at para 7.1.34**



**Update of JCS 5 Year Housing Land Supply table at para 7.1.34**

	<b>Housing Delivery as of end March 2021</b>	<b>Explanation</b>	<b>5% Buffer</b>	
<b>A</b>	<b>GCC annual housing requirement</b>		<b>718</b>	<b>718</b>
<b>B</b>	<b>Number of years into the plan period to adoption</b>		<b>10</b>	<b>10</b>

		<b>C</b>	<b>Requirement to plan adoption</b>		<b>7,180</b>	<b>7,180</b>								
		<b>D</b>	<b>Actual delivery 2011 - 2021</b>		<b>5,205</b>	<b>5,205</b>								
		<b>E</b>	<b>Total delivery to date</b>		<b>5,205</b>	<b>5,205</b>								
		<b>F</b>	<b>Shortfall to date</b>	<b>F = C - D</b>	<b>1,975</b>	<b>1,975</b>								
					<b>Sedgefield</b>	<b>Liverpool</b>								
		<b>G</b>	<b>5 year requirement</b>	<b>G = A x 5</b>	<b>3,590</b>	<b>3,590</b>								
		<b>H</b>	<b>Remainder of plan period (years)</b>		<b>10</b>	<b>10</b>								
		<b>I</b>	<b>Plan period shortfall to be met within the five year period</b>	<b>I = Sedgefield = F Liverpool = (F/H) x 5</b>	<b>1,975</b>	<b>988</b>								
		<b>J</b>	<b>NPPF buffer</b>	<b>J = 5% of (G+I)</b>	<b>278</b>	<b>229</b>								
		<b>K</b>	<b>Total number of dwellings required</b>	<b>K = G + I + J</b>	<b>5,843</b>	<b>4,806</b>								
		<b>L</b>	<b>Total anticipated supply over 5 years</b>		<b>4,809</b>	<b>4,809</b>								
		<b>M</b>	<b>Percentage of total requirement met</b>	<b>M = (L/K) x 100</b>	<b>82%</b>	<b>100%</b>								
		<b>N</b>	<b>Supply in years</b>	<b>M = (L/K) x 5</b>	<b>4.1</b>	<b>5.0</b>								
MM6(C)	Housing New appendix	<p><b><u>Appendix 1 – Housing trajectory and five-year housing land supply calculation</u></b></p> <p><b><u>Travelling Showpeople plots</u></b></p> <p><b><u>For Travelling Showpeople plots for households that meet the definition, the five-year housing land supply requirement as set out in the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017), are as follows.</u></b></p> <table border="1"> <thead> <tr> <th><u>Years</u></th> <th><u>0 – 5 2021 – 2026</u></th> <th><u>6 – 10 2026 – 2031</u></th> <th><u>Total</u></th> </tr> </thead> <tbody> <tr> <td><u>Plots</u></td> <td><u>7</u></td> <td><u>1</u></td> <td><u>8</u></td> </tr> </tbody> </table>					<u>Years</u>	<u>0 – 5 2021 – 2026</u>	<u>6 – 10 2026 – 2031</u>	<u>Total</u>	<u>Plots</u>	<u>7</u>	<u>1</u>	<u>8</u>
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<u>Plots</u>	<u>7</u>	<u>1</u>	<u>8</u>											

		<p><b><u>At the time of writing, there are no deliverable sites within Gloucester to provide for this need. However, the City Council continues to explore opportunities within its administrative area and engage proactively with neighbouring authorities to identify deliverable sites, and that policies in the JCS support the delivery of windfall sites where in accordance with the development plan.</u></b></p>
MM7	<p>Policy A1 Effective and efficient use of land and buildings</p> <p>Paras 3.1.13 and 3.1.14</p>	<p>Policy A1: Effective and efficient use of <u>housing</u> land and buildings</p> <div data-bbox="871 485 1897 1351" style="border: 1px solid black; padding: 10px;"> <p>Development <b>will be permitted where it</b> proposals are required to makes effective and efficient use of land and buildings. Development proposals should:</p> <ol style="list-style-type: none"> <li>1. Result in overall improvements to the built and natural environment; and</li> <li>2. Be of a suitable scale for the site and not have a significant adverse impact on the character of the locality, the appearance of the street scene, <del>or the amenities enjoyed by the occupiers of the neighbouring properties</del> <b><u>and the living conditions of neighbouring occupiers or future residents</u></b>; and</li> <li>3. <del>Not lead to a saturation of intensified properties within the area; and</del></li> <li>3. Provide adequate off-street parking, access, covered and secure cycle storage which provides for the existing and proposed use; and</li> <li>4. Not prejudice the potential for the comprehensive development of adjacent land; and</li> <li>5. Provide outdoor amenity space and garden space at a level that reflects the character of the area and the scale of the development; and</li> <li>6. Provide adequate, well designed, appropriately located and accessible bin storage areas; <b><u>and</u></b></li> <li>7. <b><u>Be well-designed to create and support healthy living conditions.</u></b></li> </ol> <p>Mixed-use developments and the re-use of vacant floors above commercial premises will be supported where it can be demonstrated that the uses are compatible and will result in safe and healthy living conditions.</p> </div>

		<p><del>3.1.13</del> Where it is proposed to intensify an existing building (by conversion into flats or large House in Multiple Occupation) it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area including its character. When assessing whether a proposed intensification of a dwelling would impact the character of the area consideration will be given to the number of existing of intensifications in the area. Applications that would result in a saturation of family homes converted into flats or HMOs will not be permitted. Saturation is deemed to be reached if:</p> <ol style="list-style-type: none"> <li><del>1.</del> It would result in any residential property (C3 use) being ‘sandwiched’ between two intensified properties; or</li> <li><del>2.</del> Intensified properties represent more than 10% of households within a 100-metre radius of the application property.</li> </ol> <p><del>3.1.14</del> <b>4.1.16</b> Careful consideration will be given to the design and location of the proposal as well as to amenity space, parking, servicing and access arrangements. Any residential development, including the intensification of an existing dwelling, will be required to provide a suitable housing mix in accordance with SD11 Housing Mix and Standards of the JCS.</p>
MM8	<p>New Policy – Houses in Multiple Occupation</p> <p>New paragraphs</p>	<p><b><u>Policy A2: Houses in Multiple Occupation</u></b></p> <div style="border: 1px solid black; background-color: #e0e0e0; padding: 10px; margin-top: 10px;"> <p><b><u>Planning permission for the creation of a House in Multiple Occupation (HMOs) will be permitted where:</u></b></p> <ol style="list-style-type: none"> <li><b><u>1) The development would not result in any existing residential property (C3 use) being ‘sandwiched’ between two HMOs; and</u></b></li> <li><b><u>2) The development would not result in the creation of more than two adjacent properties in HMO use; and</u></b></li> <li><b><u>3) HMOs, including the proposed development, would represent no more than 10% of properties within a 100-metre radius of the application property.</u></b></li> </ol> </div>

		<p><b><u>4.1.19 HMOs are residential properties that were originally intended for a single household and have since been converted into a large HMO (Sui Generis) requiring planning permission.</u></b></p> <p><b><u>4.1.20 Whilst HMOs can provide a valuable housing option for many, high concentrations can have a negative impact on the character of an area, and the amenities enjoyed by existing residents. To ensure an appropriate balance HMOs will be required to provide a suitable housing mix in accordance with SD11 Housing Mix and Standards of the JCS and accord with the other policies of the GCP.</u></b></p> <p><b><u>4.1.21 The number of properties will be calculated using the Council’s GIS (Geographic Information Systems) mapping software. Each property has a unique location point defined on the National Land and Property Gazetteer (NLPG) and the location point of the proposed HMO will be the centre of the 100m radius. The number of residential properties falling within the 100m radius of the proposed HMO will be assessed by totalling the location points falling within that defined radius. Properties that fall partly within the 100m radius will only be included if the location point, as depicted on the NLPG, falls within this buffer.</u></b></p> <p><b><u>4.1.22 For the purpose of this approach, dwellings that are either within purpose-built blocks of flats, or within houses that have been sub-divided into separate flats, are all counted as one single property, and only the first address point is counted. This will avoid counts becoming ‘skewed’ by a high proportion of flats in one small area. Where a property is in mixed use, the first residential address point is counted.</u></b></p> <p><b><u>4.1.23 In an area with an Article 4 Direction small HMOs (Use Class C4) will also be counted as intensified properties. Outside of an Article 4 direction, small HMOs will not be counted as intensified properties as they do not require the benefit of planning permission.</u></b></p>
MM9	<p>Policy A2 – Affordable Housing</p> <p>Paras 3.1.17 to 3.1.24</p>	<p>Policy A2: Affordable Housing</p> <div data-bbox="831 1166 1935 1382" style="border: 1px solid black; padding: 5px;"> <p>On residential sites of 10 dwellings or more, or sites with a gross site area of 0.5 hectares or more, 25% affordable housing is required on all residential sites within Gloucester City.</p> <p>The City Council will support grant aided schemes that deliver greater than 25% affordable housing, and tenure and house types, that meet the city’s needs. The occupation of</p> </div>

		<p>affordable housing will be limited to people in need of affordable housing and shall be secured in perpetuity.</p> <p>Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the pro-rata percentage of affordable housing sought will apply to the larger area as a whole.</p> <p><del>3.1.17 Gloucester has a significant need for more affordable homes. JCS Policy SD12 sets out the overarching strategic policy position; 'Outside of the strategic allocations, on sites of 11 dwellings or more, or sites with a maximum combined floorspace of greater than 1,000 sq m; a minimum of 20% affordable housing will be sought on developments in Gloucester City...' This policy reflects the fact that the evidence underpinning the JCS identified value areas within which different levels of affordable housing could be achieved. This evidence has been strengthened through the Viability Appraisal prepared in support the GCP, and this demonstrates that a 25% figure can be supported residential developments in the city. Please note that since the JCS was adopted, the Government has amended the affordable thresholds as reflected in the policy above.</del></p> <p><del>3.1.18 Affordable housing is defined within the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), including (a) affordable housing for rent (b) starter homes (c) discounted market sales housing (d) other affordable routes to home ownership such as shared ownership.</del></p> <p><del>3.1.19 In accordance with the adopted JCS, affordable housing should be provided on-site and seamlessly integrated and distributed through the development scheme. Developments should also include a balanced mix of dwelling sizes, types and tenures to meet the future housing needs of the area, including affordable rent, and the design and price of homes should ensure they are genuinely affordable and fit for purpose.</del></p> <p><del>3.1.20 The density, layout and type/tenure mix of a site can impact on viability and therefore the ability to deliver affordable housing. Applicants should design schemes to ensure the most efficient and effective use of land, whilst being consistent with other policies in the JCS and GCP, for example in relation to design and heritage.</del></p>	
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		<p>3.1.21 In exceptional circumstances where an applicant may be able to provide robust evidence to demonstrate an inability to meet the affordable housing requirement, evidence must be provided in the form of a viability appraisal. This will be independently assessed for the City Council by a third party and this will be paid for by the applicant. Clarity as to the particular circumstances that have given rise to the development's reduced viability or non-viability will be established through either an open-book valuation or through an independently commissioned assessment using the Homes and Communities Agency 'Development Appraisal Tool' or other equivalent tools, to be agreed with the City Council in advance of the assessment.</p> <p>3.1.22 Where it can be demonstrated through viability that a development cannot support the required 25% affordable housing, the applicant is expected to seek, in accordance with JCS Policy SD12, public funding or other public subsidy in order to support the required level of affordable housing. Equally, the applicant should consider the mix and design of a scheme (whilst according with other relevant policies in the JCS and GCP) in order to reduce costs and maximise the delivery of affordable housing.</p> <p>3.1.23 The City Council will support schemes that deliver levels of affordable housing greater than 25%, through public subsidy or other mechanisms.</p> <p>3.1.24 In some circumstances, vacant building credit may apply to developments that would bring vacant buildings on a site back into lawful use, or where such buildings are demolished as part of a development. If the site in question is eligible, this would reduce the expected affordable housing contribution from a site.</p>
MM10	Policy A4 – Student accommodation	<p>Proposals for new purpose-built student accommodation must satisfy the following criteria:</p> <ol style="list-style-type: none"> <li>1. The proposal will provide for an identified need of a further educational establishment located in Gloucestershire, for students attending full-time courses for one academic year or more; and</li> <li>2. The developer has entered into a formal agreement with the further education establishment; and</li> </ol>

		<ol style="list-style-type: none"> <li>3. The proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution(s); and</li> <li>4. The location is well served by sustainable transport modes <b><u>to the educational establishment;</u></b> and</li> <li>5. Rooms and facilities are of an appropriate size for living and studying.</li> </ol>	
<p>MM11</p>	<p>Policy A5 – Specialist housing</p> <p>Paras 3.1.38 and 3.1.39</p> <p>New paragraph</p>	<p>Development proposals for specialist housing must be <b><u>Specialist housing developments will be permitted where they:</u></b></p> <ol style="list-style-type: none"> <li>1. <b><u>Are</u></b> supported by evidence of the demonstrable need for this form of housing within Gloucester City;</li> <li>2. <b><u>Are</u></b> suitable for the intended occupiers in relation to the affordability, quality, design and type of facilities with, if appropriate, the provision of support and/or care; <del>supported by a sustainable business model.</del></li> <li>3. <b><u>Are</u></b> accessible to local shops and services, public transport and community facilities appropriate to the needs of the intended occupiers; and</li> <li>4. In a location that avoids excessive concentration of such housing within any one street or small area. <b><u>Will not lead to harm through over concentration in the local area, including but not limited to:</u></b> <ol style="list-style-type: none"> <li>a. <b><u>Levels of activity that cause excessive noise and disturbance to local residents</u></b></li> <li>b. <b><u>Excessive demand on social infrastructure, such as health and social care and police services</u></b></li> <li>c. <b><u>Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.</u></b></li> </ol> </li> </ol> <p>Where the development falls within use class C3 (dwelling houses), the development will be expected to contribute to the supply of affordable housing within Gloucester. <del>in accordance with Policy A2.</del></p>	



		<p style="text-align: center;"><b>[REDACTED]</b></p> <p><del>3.1.38</del> <b>4.1.37</b> Older persons households, and disabled persons households often have a limited income. <b><u>Where the development falls within use class C3 (dwelling houses), the development will be expected to contribute to the supply of affordable housing within Gloucester.</u></b> Therefore, applications will need to demonstrate how the housing costs and related service charges are sustainable in relation to local earnings and incomes of the specific group for which the housing is designed. A scheme’s eligibility to be treated as ‘exempt accommodation’ for Local Housing Allowance purposes is not an indication that the provision is affordable housing, merely that the residents housing costs are benefit supported. Consideration will need to be given to future needs of residents and whether benefit dependency undermines longer term personal development, care, or housing needs.</p> <p><del>3.1.39</del> <b>4.1.38</b> Given that specialist housing often provides housing for vulnerable persons, the safeguarding of their health and wellbeing is a key issue. Proposals will need to demonstrate that the landlord and service providers are either on a relevant procurement framework and/or can demonstrate that they are a fit and proper organisation to deliver the proposed scheme. Legal agreement will allow for the substitution of landlords or service providers whose business model risks long term delivery of the housing or the support/services, or the management of the scheme or provision of support/services are deemed inadequate by the Council and /or Social /Health Care commissioners.</p> <p><b>4.1.39 Proposals should support the building of mixed and balanced communities and the over concentration of specialist housing in an area may lead to harm, for example through a significant adverse impact on the amenity of occupiers in the local area, and/or excessive demand on social infrastructure.</b></p>
MM12	<p>Policy A6 – Accessible and adaptable homes</p> <p>Paras 3.1.41 and 3.1.42, 3.1.45 and 3.1.46</p>	<p style="text-align: center;"><b>[REDACTED]</b></p> <p>In order to create accessible homes that meets the needs of an aging population, frail and disabled persons, and to meet the City Council’s duty under the Equalities Act, the following accessible and adaptable homes standards will be met:</p> <ol style="list-style-type: none"> <li>1. <del>50</del><b>25</b>% of housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’ to be met; and</li> </ol>

2. 4 (four) % of the affordable housing component of every housing development should meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' ~~to be wheelchair accessible or be easily adapted for residents who are wheelchair users.~~

~~3.1.41~~ **4.1.41** Homes built to M4 (2) standards have design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs or enable future adaptation to accommodate this diversity of use. **Developers are encouraged to provide M4(2) dwellings across all type and tenure to meet identified need in the city.**

~~3.1.42~~ **4.1.42** **Homes built to M4(3) 2 (b) standard are sufficient to meet the needs of occupants who are wheelchair users.** The National Planning Practice Guidance states that local plan policies for wheelchair accessible homes M4 (3) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. In the interest of mixed and balanced communities, the Council would also encourage developers to build wheelchair accessible market homes, and Policy A7: Self build and custom build homes also supports provision of such homes. **4% of affordable homes should be wheelchair accessible to meet identified need on the City Council's Housing Register. Provision shall comprise of affordable rented homes to which the city council will allocate households.**

~~3.1.45~~ **4.1.45** Developers of Specialist Housing may wish to increase the level of M4(3) category homes to reflect the needs of the intended occupants. **In complying with this policy, developers, and in particular those delivering specialist housing, may wish to increase the proportion of properties which meet the higher M4 (2) and M4 (3) standards, including the provision of wheelchair accessible housing.**

~~3.1.46~~ **4.1.46** Compliance with the criteria should be demonstrated in the Design and Access Statement submitted with the planning application and conditions will be applied to any consent granted to ensure the standards are complied with. **Exceptions will only be made where the applicant can clearly demonstrate why, given the particular site-specific circumstances of a development, the standards cannot be met. This could, for example, be where the structure of an existing building would preclude its conversion to housing in a manner consistent with the standards.**

<p>MM13</p>	<p>Policy A7 – Self-build and custom build homes</p>	<p>For all housing sites* either allocated in this plan or which come forward as windfall developments, and which comprise 20 or more <del>dwellings</del> <b>houses</b>, a minimum of 5% of the net developable area shall be set aside as serviced plots. <del>t</del>The serviced plots shall be offered for sale to self and custom builders, subject to demand being identified on the Council’s Self &amp; Custom Build Register.</p> <p>Self and custom build plots which come forward through this policy shall be made available and appropriately marketed for a minimum of 12 months from grant of planning permission, <b>or a shorter period if agreed by the City Council</b>. Marketing should be directed at those on the Council’s Self and Custom Build Register as well as the general public. If, after <b>the agreed set marketing period</b> a 12-month period, the plots have not been sold it will be for the developer to consider whether the plots continue to be marketed as self / custom build opportunities or if they will be built out by the developer. Evidence of sustained marketing will need to be submitted to the Council.</p> <p>Elsewhere, windfall sites for self-build and/or custom build housing will be supported where they meet other policies within the JCP and GCP.</p> <p>* Excluding sites and applications for flats/apartments.</p>
<p>MM14</p>	<p>Employment development, culture and tourism</p> <p>Paras 3.2.2 and 3.2.3</p>	<p><i>Employment land</i></p> <p><del>3.2.2</del> <b>4.2.2</b> Limited land supply within the administrative area of the City Council means that the strategic growth must take place in neighbouring authorities and the City Council must work with those authorities in realizing growth aspirations.</p> <p><del>3.2.2</del> <b>4.2.3</b> <b>Employment land is considered on a JCS-wide basis, providing an</b> <del>The JCS provided an</del> employment strategy for the JCS and strategic land release at urban extensions, aligned with the Strategic Economic Plan (SEP). <b>Across the JCS area, through both strategic and non-strategic allocations, provision has been made for at least 192 hectares of traditional employment land. At the JCS examination,</b></p>

		<p><b><u>evidence was provided to demonstrate that there was a capacity of 7ha of employment land in the city (1). The GCP allocates 8.1 hectares, either as 100% ‘traditional’ employment sites or as part of wider mixed-used schemes. Together with recent commitments, such as those at King’s Quarter, there is the opportunity for a substantial amount of floorspace to be delivered over the plan period.</u></b></p> <p><del>3.2.3</del> <b>4.2.4</b> That said, The GCP plays its part in allocating sites for additional employment land, in whole or in part, at the following locations; SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; <b>and SA21</b> Part of West Quay, The Docks; and SA22 Land adjacent to Secunda Way Industrial Estate. Further information is available in Section 4 of this plan – Site allocations.</p>
<p>MM15</p>	<p>Policy B1 – Employment and skills plans</p> <p>Para 4.2.16</p> <p>New paragraphs</p>	<div data-bbox="790 628 1895 1098" style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>For housing development of 10 or more units and major commercial development of 1,000 sq. m or more of new internal floorspace, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the proposal and identify opportunities for the employment and skills development of local people through <b>during</b> the implementation <b>construction and operational stages</b> of the proposal.</p> <p>The ESP should address priorities identified and agreed at an early stage through consultation with the City Council and local employment and skills agencies. The ESP will have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development.</p> </div> <p><b>4.2.13</b> The ESP should address priorities identified <b>by relevant local industry groups, such as the Construction Industry Training Board (CITB)</b> and be agreed at an early stage through consultation with the City Council and local employment and skills agencies. The ESP <del>should</del> <b>will</b> have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development.</p>

		<p><b><u>4.2.14</u></b> The City Council will further support proposals within the ESP that seek to deliver the employment and skills aims of the EGS during the operational stage of the development.</p> <p><b><u>4.2.15</u></b> The City Council will keep the effectiveness of the policy under review through regular dialogue with housebuilders and through liaison with the Gloucestershire Employment and Skills Board, which includes industry representatives alongside learning and skills providers.</p> <p><del>3.2.11</del> <b><u>4.2.16</u></b> Further guidance in relation to the preparation and implementation of Employment and Skills Plans is available on the City Council’s website.</p>
<p>MM16</p>	<p>Policy B2 – Safeguarding employment land and buildings</p> <p>Paragraph 3.2.16</p>	<div data-bbox="790 592 1895 1169" style="border: 1px solid black; padding: 10px;"> <p>Employment sites and buildings will be safeguarded for B-class employment uses <b><u>offices, research and development, light industrial, general industrial and storage and distribution,</u></b> and change of use/redevelopment to non-B class <b><u>other</u></b> uses will generally be resisted. Such proposals will only be supported where the following criteria are met:</p> <ul style="list-style-type: none"> <li>a. The site or premise is redundant or no longer fit for purpose or capable of meeting employment needs; <b><u>and or</u></b></li> <li><b><u>b. Alternative local employment facilities or an equivalent standard can be provided without adversely impacting on the operation of the existing business and its accessibility to existing employees; and</u></b></li> <li>c. The proposal would not adversely impact on the continued use of adjacent employment uses; <b><u>and</u></b></li> <li>d. The proposal would bring significant benefits to the local economy and/or community that would demonstrably outweigh the loss of employment land.</li> </ul> </div> <p><del>3.2.16</del> <b><u>4.2.21</u></b> For the avoidance of doubt, This policy applies to all employment falling into Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) including Class B1 (a, b and c), B2 and B8. It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP.</p>

MM17	<p>Policy B3 – New employment development and intensification and improvement to existing employment land</p> <p>New paragraph</p>	<p>Development proposals for new 'B' class employment development <b>offices, research and development, light industrial, general industrial, and storage and distribution</b>, and/or to improve the quality of accommodation, the environment and intensify the use of existing employment sites will be supported where the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. Any increase in traffic can be accommodated by the transport network; and</li> <li>2. Satisfactory vehicular access, parking and maneuvering space can be provided; and</li> <li>3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties <b>and it would not place unreasonable operational restrictions on adjacent existing or allocated land uses;</b> and</li> <li>4. The scale and design of the proposal is compatible with the character of the location; and</li> <li>5. It would not result in unacceptable adverse environmental impacts, for example in terms of noise, air, water, soil or light pollution; <b>and</b></li> <li>6. <b><u>Provision is made for the delivery of efficient and effective commercial waste collection services.</u></b></li> </ol> <p>Proposals for limited non-B class- <b>development outside these</b> uses will be supported where they are genuinely ancillary / complementary to the primary use of the site for B class uses. Where such uses are defined as 'main town centres uses', they will be considered in the context of Adopted JCS Policy SD2 'Retail and City / Town Centres'.</p> <p><b><u>4.2.26 With regards to waste collection from employment sites the City and County Council wish to see high quality facilities which support the implementation of the waste hierarchy and encourage the practices of resource efficiency and waste reduction.</u></b></p>
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MM18	<p>Policy B4 – Development within and adjacent to Gloucester Docks and Canal</p> <p>Paras 3.2.21</p>	<p>Development proposals within, or adjacent to the docks and canal that facilitate accessibility and recreational use of the historic docks, waterspace and the wider canal network will be supported where they satisfy the following criteria:</p> <ol style="list-style-type: none"> <li>1. The development will not infill or reduce the depth of water of docks/canal waterspaces to the extent where it would limit the range of boats and other craft that could safely navigate and/or operate within the waterspaces; and</li> <li>2. <del>The development would not adversely affect, and where possible enhances the historic built character, features and setting of the open waterspaces; and</del> <b><u>2. Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness; and</u></b></li> <li>3. There will be no significant adverse impact on the environmental amenity of local residents, visitors, workers or other recreational users of the waterspace; and</li> <li>4. The development will not adversely affect existing, and where possible makes appropriate provision for future management and maintenance of public realm, movement routes, waterspaces and quaysides, moorings or waterway infrastructure and utilities. Where appropriate, opportunities should be taken to improve or reinstate the canal towpath; and</li> <li>5. <b><u>The development would not adversely affect the functioning of existing businesses; and</u></b></li> <li>6. Development provides net biodiversity gain and facilitates its role as <b><u>delivery of</u></b> multifunctional green and blue infrastructure (including water quality).</li> </ol> <p>Where development could have an impact on internationally designated sites a Habitats Regulations Assessment is required.</p>
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		<p><del>3.2.21</del> <b>4.2.27</b> Gloucester Docks and the canal side is a major cultural and historic asset for the city, and already represents a major tourist attraction with the National Waterways Museum, Soldiers of Gloucestershire Museum and various festivals and events. <b><u>The docks are also home to both commercial and leisure moorings as well as other commercial uses, including a successful working boatyard which add heritage value and visual interest to both the dockside and waterspace.</u></b></p> <p><del>3.2.21</del> <b>4.2.28</b> However, the waterspace is generally underutilized and represent an opportunity to attract further investment, generate footfall within the city centre and encourage physical activity and improved health and wellbeing. The Canal and River Trust has prepared a Waterspace Strategy for Gloucester Docks, which aims to increase the recreational use of the Docks and canal, <b><u>whilst retaining and supporting existing uses.</u></b></p>
MM63	<p>Policy B5 – Tourism and culture</p> <p>Paragraph 3.2.26</p>	<div data-bbox="790 663 1895 1026" style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p><b><del>The City Council will support proposals that deliver the Cultural Strategy and Vision (2016 – 2026), or any future iteration. This includes proposals for the provision of new creative workspaces and for the improvement and/or extension of existing tourism, arts and cultural workspace and facilities.</del></b></p> <p><b>Where the proposal includes ‘main town centre uses’, the applicant must demonstrate compliance with the sequential test and impact test, as set out at Policy SD2 of the adopted Joint Core Strategy.</b></p> </div> <p><del>3.2.26</del> <b>4.2.33</b> Gloucester has a strong and unique culture and tourism offer, with Gloucester Cathedral, the Docks, over 700 Listed buildings, Roman heritage, Gloucester Rugby, thriving festivals and events, museums and cultural venues such as the Guildhall. At the same time, it is recognized that the city lags other cities and towns of a similar size or status. In response to this, the City Council and the Gloucester Culture Trust have ambitions to build on current strengths and develop and cultural and arts offer of the city further. <b><u>The Gloucester Cultural Strategy and Vision Update 2021 – 2026 sets out a range of objectives and actions that seek to embed culture into the city’s future plans, build cultural and creative industries, activities, festivals and events, and empower young people to participate in culture.</u></b> Further opportunity is</p>



		<p>identified in the City Council’s adopted Heritage Strategy (2019) in terms of the role that the historic environment can play in underpinning the delivery of quality places, tourism and culture.</p>
<p>MM19</p>	<p>Policy B6 – Protection of public houses</p> <p>Paragraph 3.2.29</p> <p>New paragraph</p>	<div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Development proposals for the redevelopment or change of use of public houses or buildings last used as public houses will only be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. All reasonable efforts have been made to keep the pub in viable use and it can be demonstrated that its continued use would not be feasible or practical; <b><u>This will include:</u></b> <ol style="list-style-type: none"> <li>a) <b><u>The submission of a comprehensive sustained marketing campaign (agreed in advance by the Council), offering the public house for sale as a going concern and using an agreed realistic valuation of the premises;</u></b></li> <li>b) <b><u>The agreed marketing campaign will be run for a period of at least six months before the planning application is submitted;</u></b></li> <li>c) <b><u>The public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents;</u></b></li> </ol> <p>or</p> </li> <li>2. There is an existing public house within a reasonable walking distance that meets the needs of the local community; or</li> <li>3. A replacement public house <b><u>that meets the needs of the local community</u></b> will be provided on part or all of the site, or within <b><u>reasonable</u></b> walking distance of the site.</li> </ol> </div> <p><del>3.2.29</del> <b><u>4.2.36</u></b> Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use. <del>In order to satisfy the</del></p>

		<p>requirements of this policy, applicants will normally be expected to submit evidence demonstrating the following:</p> <ul style="list-style-type: none"> <li>a) <del>A comprehensive sustained marketing campaign (agreed in advance by the Council) has been undertaken, offering the public house for sale as a going concern and using an agreed realistic valuation of the premises;</del></li> <li>b) <del>The marketing campaign has run for a period of at least six months before the planning application is submitted;</del></li> <li>c) <del>The public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents;</del></li> <li>d) <del>Extensive engagement with the local community to demonstrate the acceptability of existing provision within a reasonable walking distance for the community, or alternative replacement provision.</del></li> <li>e) <del>Opportunities have been explored for the public house to be taken forward through a community ownership initiative.</del></li> </ul> <p><b><u>4.2.37 To demonstrate that the alternative or proposed public house meets the needs of the local community evidence of extensive engagement will be required. As well as seeking the views of the community on their needs and the suitability of alternative or proposed provision, the community consultation shall also make the community aware of community ownership initiatives.</u></b></p>
MM20  MM63	Policy C1 – Active design and accessibility  Paragraphs 3.3.9 – 3.3.11	<div style="border: 1px solid black; padding: 10px;"> <p>Development proposals must clearly demonstrate <b><u>meet the highest possible standards of accessible and inclusive design, so that:</u></b></p> <ul style="list-style-type: none"> <li>1. <del>A layout that fully accords with the principles of Active Design outlined by Sport England, or any future iteration;</del></li> <li>2. <del>The proposal meets the highest possible standards of accessible and inclusive design, meeting the following principles:</del> <ul style="list-style-type: none"> <li>1. The development can be used safely, easily and with dignity by all regardless of ability, age, gender, ethnicity or economic circumstances; and</li> </ul> </li> </ul> </div>

		<p>2. The development is convenient and welcoming with no disabling barriers, so that everyone can use the development independently without undue effort, separation, or special treatment; <b>and</b></p> <p>3. <b><u>The development will support healthy active lifestyles by facilitating participation in physical activity by:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>Creating the conditions for active travel between all locations within the development and to the wider local shops, services, built and natural surroundings.</u></b></li> <li>b) <b><u>Prioritising active travel through safe integrated walking, running and cycling routes separate from vehicular activity.</u></b></li> <li>c) <b><u>Locating new facilities in the best location for those walking, cycling or using public transport.</u></b></li> <li>d) <b><u>Providing multifunctional spaces opens opportunities for sport and physical activity.</u></b></li> <li>e) <b><u>Creating a network of streets and spaces that are well enclosed by buildings and/or structural landscaping.</u></b></li> <li>f) <b><u>Creating a clear hierarchy of principal and secondary streets and</u></b></li> <li>g) <b><u>Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.</u></b></li> </ul> <p>3.3.9 <b><u>4.3.9</u></b> Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking or cycling. Developers <b><u>should have regard to</u></b> will be required to demonstrate how their proposals accord with the 10 Principles of Active Design outlined by Sport England in “Active Design: Planning for Health and Wellbeing through Sport and Physical Activity”, <b><u>‘Building for a Healthy Life’ (Birkbeck, D., Kruczkowski, S. with Jones, P., McGlynn, S. and Singleton, D. June 2020)</u></b>, or any future iteration, <b><u>in developing proposals.</u></b></p> <p>3.3.10 <del>Cycle parking, cycle storage, accessibility and walking distances shall meet the guidance provided in Manual for Gloucestershire Streets and any subsequent amendments from the Highways Authority.</del></p>	
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<p>MM21 MM63</p>	<p>Policy C3 – Public open space, playing fields and sports facilities</p> <p>Paragraph 3.3.20</p> <p>New paragraphs</p>	<div style="border: 1px solid black; padding: 10px;"> <p>Existing public open spaces, playing fields and built sports facilities will be protected from redevelopment to alternative uses, in whole or in part, unless <del>it can be demonstrated that</del> <b><u>the following criteria are met:</u></b></p> <ol style="list-style-type: none"> <li>1. <b><u>For public open spaces, an assessment demonstrates the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide.</u></b></li> <li>2. <b><u>For playing fields and sports facilities, an assessment demonstrates</u></b> there is an excess of provision in the local area, there is no current or planned future demand for such provision, <b><u>or</u></b> that there would be no overall shortfall <b><u>in provision.</u></b></li> </ol> <p>If the criteria above cannot be met:</p> <ol style="list-style-type: none"> <li>3. The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; <b><u>or</u></b></li> <li>4. The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; <b><u>or</u></b></li> <li>5. The proposal affects land that is not suitable, or <b><u>is</u></b> incapable, of forming an effective part of <del>the</del> <b><u>an</u></b> open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.</li> </ol> <p>The need for <del>n</del> New open space, and playing fields <b><u>and built sport facilities</u></b> within new development will be determined <b><u>provided</u></b> in accordance with <b><u>to meet</u></b> the</p> </div>

		<p><u>needs of the local area.</u> aims and recommendations of the City Council's Open Space Strategy and Playing Pitch Strategy.</p> <p>Development proposals to enhance or provide new open spaces, playing fields or built sports facilities will be supported where they <b>meet the needs of the local area.</b> deliver the aims and recommendations of the Council's Open Space Strategy, Playing Pitch Strategy and Built Sports Facilities Strategy, or any future iterations.</p> <p><b><u>4.3.19 The Council has set out in its adopted Open Space Strategy (OSS), Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BSFS), the needs of the local area both in terms of the provision and the necessary enhancements required to improve the provision. These documents, or any future iterations, provide the detailed background evidence to support the delivery of the Council's aims and recommendations for new and enhanced open space, playing pitches, and built sports facilities.</u></b></p> <p><b><u>4.3.20 The Council's strategies also provide an assessment of the public open spaces, playing pitches and built sports facilities within the local area. These approved assessments, or any future update them, will be used when assessing criterion 1 and 2 of this policy. It is recommended that the scope and methodology of any third-party assessments are approved in advance.</u></b></p> <p><del>3.3.20</del> Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.</p>	
MM22	<p>Policy C4 – Hot food takeaways</p> <p>Paragraph 3.3.23</p>	<p>Proposals for hot food takeaways, including mobile catering units must satisfy the following criteria:</p> <ol style="list-style-type: none"> <li>1. The design of the unit, including its ventilation and bin storage would not have a significant adverse impact on the visual amenity of the area; and</li> </ol>	

		<p>2. There would not be a significant adverse impact on the amenities of occupants of neighbouring <b>nearby</b> properties <del>within a reasonable distance of the proposed location</del> in terms of noise, traffic disturbance, odour, litter, light or hours of operation; and</p> <p>3. There would not be an <b>unacceptable</b> severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues; and</p> <p>4. The proposal incorporates adequate waste storage and disposal facilities; and</p> <p>5. There should be a minimum of two non-<b>hot food takeaway units</b> <del>A5 units</del>, or at least 10 metres, between the units, whichever is greater.</p> <p>6. Outside of the city centre, district centres and local centres, that the proposal is not within 400 metres of <b>any access to</b> a secondary school or college.</p>
		<p><del>3.3.23</del> <b>4.3.24</b> To help tackle childhood obesity through supporting healthy behaviours, hot food takeaways will not be permitted within 400 metres of <b>any access to</b> a secondary schools or colleges. Primary schools have been excluded as children in this age group are normally restricted from leaving the school premises at breaktimes.</p>
MM64	Policy C5 – Air Quality Paragraph 3.3.30	<p><del>3.3.30</del> <b>4.3.31</b> In terms of trees, it is important to note that the level of effectiveness of any planting will depend on the season, the number of trees, the species, the siting, the canopy density and the prevailing wind direction in the particular street. NPPF Paragraph <del>81</del> <b>186</b> states that in tackling air pollution green infrastructure provision and enhancement should be considered along with other initiatives.</p>
MM23	Policy C6 – Cordon Sanitaire  Paragraphs 3.3.31 – 3.3.33  New paragraphs	<p>Policy C6: Cordon sanitaire – <b><u>Netheridge Sewage Treatment Works</u></b></p> <p>Development likely to be adversely affected by smell from Netheridge Sewage Works, within the Cordon Sanitaire defined on the policies map, will not be permitted.</p> <p><b><u>Planning permission will be granted for development within the Cordon Sanitaire, as shown on the policies map, where it can be clearly demonstrated through a robust odour assessment that:</u></b></p>

1. The users/occupants of the proposed development will not be adversely affected by odour nuisance; and
2. The introduction of the proposed use will not adversely affect the continued operation of the Netheridge Sewage Treatment Works.

~~3.3.31~~ **4.3.33** Severn Trent Water PLC (Severn Trent) is responsible for sewerage and sewage disposal. They operate Netheridge Sewage Treatment Works (NSTW) south of Hempsted, a facility that processes a significant amount of waste from Gloucester City and beyond. The fields adjoining Netheridge are used for sludge disposal that, in addition to the works itself, create unavoidable smell problems within the area. In order to reasonably prevent development that would be adversely affected by smell, a cordon sanitaire area is shown on the proposals map within which development will not be permitted **which is a strategic regional/subregional waste facility, processing permitted and non-permitted waste, for sewerage/sludge, domestic waste and trade waste. In order to prevent development that would be subject to odour nuisance and to prevent unreasonable constraints on the operation of NSTW, a Cordon Sanitaire is shown on the policies map. Development within the Cordon Sanitaire will not be permitted unless it can be shown that odour nuisance risk is negligible to future occupiers of that development.**

**4.3.34** NSTW is identified in the Gloucestershire Waste Core Strategy 2012 under Core Policy WCS11 'Safeguarding Site for Waste Management', which states:

**'Existing and allocated sites for waste management use will normally be safeguarded by local planning authorities who must consult the Waste Planning Authority where there is likely to be incompatibility between land uses. Proposals that would adversely affect, or be affected by, waste management uses will not be permitted unless it can be satisfactorily demonstrated by the applicant that there would be no conflict.**

**The Waste Planning Authority will oppose proposals for development that would prejudice the use of the site for waste management.'**

~~3.3.32~~ **4.3.35** To support this Policy **C6**, an assessment of odour nuisance arising from NSTW has been undertaken and has informed the boundary on the policies map. The study is informed by a review of

		<p>odour complains, odour surveys, a detailed dispersion model assessment and a review of a previous model assessment. Severn Trent were engaged in the review process in order to understand currently and future operations, including plans for any proposed future infrastructure improvements to accommodate additional waste and/or to reduce the impact of odour on the surrounding area. It categorises likely odour nuisance on the basis of odour contours from the sewage works.</p> <p><del>3.3.33</del> The extent of the cordon sanitaire has been drawn on the basis the area most likely to be affected by odour nuisance, within the 3—5 odour contour area. This boundary does not represent the absolute limit of the area where smells can be detected but is drawn so as not unreasonably to constrain development in the existing built-up area.</p> <p><b><u>4.3.36 The Cordon Sanitaire is necessarily conservative as there is uncertainty as to how odorous emissions from NSTW might alter over the plan period – for example from the intensification of waste facilities at the site due to new development and/or from the closure of nearby facilities, or from a reduction in odour emissions from NSTW through the introduction of new technology.</u></b></p> <p><b><u>4.3.37 If development is proposed within the Cordon Sanitaire, whose occupants/users are likely to be sensitive to odours from NSTW, then applicants will be required to undertake appropriate assessments to show that odour nuisance would not occur, or the new use pose a risk to NSTW’s operation.</u></b></p> <p><b><u>4.3.38 Without Policy C6, an increase in nuisance impacts on new development within the Cordon Sanitaire could unduly prejudice NSTW’s operation, requiring it to pursue changes to its operation that would entail excessive cost; which would be contrary to Core Policy WCS11.</u></b></p> <p><b><u>4.3.39 Development proposed within the Cordon Sanitaire must be supported by an appropriate odour assessment in line with the Institute of Air Quality Management (IAQM) guidance. Planning applications for residential development and similarly sensitive uses must be supported by comprehensive and detailed odour dispersion modelling, and appropriate source monitoring and ground-based observations. It is strongly advised that the scope of any such odour assessment is agreed with the City Council in advance.</u></b></p>
MM24	Policy C8 – Changing Places toilets	<div style="background-color: #cccccc; width: 100%; height: 20px;"></div>



<p>MM63</p>	<p>Paragraphs 3.3.39 – 3.3.40</p> <p>New paragraph</p>	<div data-bbox="871 193 1895 448" style="border: 1px solid black; background-color: #e0e0e0; padding: 5px;"> <p>Where <u>possible</u> appropriate, <b>major non-residential developments and minor developments for community, cultural, leisure, sport and civic uses where a new or refurbished public toilet or changing facility is proposed, shall include a fully accessible and equipped toilet.</b> major applications for retail, sports venues, cultural and leisure developments that propose to provide toilets will provide at least one toilet to the ‘Changing Places’ standard.</p> </div> <p><del>3.3.39</del> <b>4.3.45</b> People with profound and multiple learning disabilities, as well as other disabilities that limit mobility, cannot often use standard accessible toilets. People may be limited in their own mobility and require equipment to help them, or the space to have support from one or more carers. Standard accessible toilets (or “disabled toilets”) do not allow for both right-hand and left-hand side transfers, provide changing benches or hoists and most are too small to accommodate more than one person. Without <del>Changing Places</del> <b>fully accessible and equipped</b> toilets, the user is put at risk, and carers are forced to risk their own health and safety by changing their loved one on a toilet floor. This is potentially dangerous, unhygienic and undignified. Everyone has a right to live in the community, to move around within it and access all its facilities. For some people the lack of a fully accessible toilet is denying them this right.</p> <p><del>3.3.40</del> <b>4.3.46</b> At present, none of the public toilets in the city <del>meet this standard</del> <b>are fully accessible</b>, although a ‘Changing Places’ toilet is proposed within the refurbishment of Kings Walk Shopping Centre. The City Council will actively encourage developers to provide enhanced accessible toilets within schemes. This is considered especially important for those uses that are accessed by the public. This <del>reduces the</del> <b>will help to improve the</b> accessibility of the city and its enjoyment for some of our residents and visitors. The Council endorse the use of “Changing Places: the practical guide” which can be found at <a href="http://www.changing-places.org/install_a_toilet.aspx">http://www.changing-places.org/install_a_toilet.aspx</a></p> <p><b>4.3.47 A fully accessible and equipped toilet includes space for two carers to change an adult with all of the necessary equipment required to do this with ease and in comfort.</b></p>
<p>MM25</p>	<p>Policy D1 – Historic Environment</p>	<div data-bbox="871 1350 1895 1385" style="border: 1px solid black; background-color: #e0e0e0; height: 20px;"></div>

		<p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <ol style="list-style-type: none"> <li>1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and</li> <li>2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and</li> <li>3. The proposed use of the heritage asset is compatible with <del>the preservation</del> <b>sustaining</b> or <del>enhancement</del> <b>enhancing</b> of its significance; and</li> <li>4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and</li> <li>5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and</li> <li>6. Retains important views into or out of the Conservation Area.</li> </ol> <p><b><u>Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.</u></b></p>	
MM26	Policy D2 – Non-designated heritage assets	<p>Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should:</p> <p><b><u>Development affecting a non-designated heritage asset, or its setting, should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered. Development proposals should:</u></b></p>	

		<ol style="list-style-type: none"> <li>1. Be of high quality and designed sympathetically to preserve the historic, architectural and archaeological interest.</li> <li>2. Respect the surrounding landscape and its setting.</li> <li>3. Seek to enhance the character of the non-designated heritage asset.</li> </ol> <p>Proposals for demolition or total loss of non-designated heritage assets will be subject to a balanced assessment taking into account the significance of the asset, the scale of harm or loss, and that all reasonable steps have been taken to retain the asset, including an assessment of alternative uses.</p>	
<p>MM27</p> <p>MM63</p>	<p>Policy D4 – Shopfronts, shutters and signs</p> <p>Paragraphs 3.4.20 and 3.4.21</p>	<p><del>There will be a presumption in favour of retaining good quality traditional shopfronts, including any features such as blind boxes or historic signage, where they make a positive contributing to the character of an area <b>will be supported.</b></del></p> <p><del>The City Council will support the following</del> <b><u>Developments for shop fronts, shutters and signage will be permitted where it can be demonstrated that:</u></b></p> <ol style="list-style-type: none"> <li>1. <del>The p</del><b><u>Proposals that retains or reinstates a</u></b> traditional timber shopfront architectural detailing, including timber fascias and painted signage; <b><u>or</u></b></li> <li>2. <b><u>Proposals for new shopfronts</u></b> <del>New shopfronts which</del> are of high quality and responds to the <b><u>character of the scale and design of the building and the</u></b> character of the area;</li> <li>3. Internal shutters <del>which</del> are open and allow shopfront displays to be prominent in the streetscene;</li> <li>4. Signage <del>which</del> is sympathetic to <b><u>the scale and architectural style of the building,</u></b> its surroundings, and <b><u>is</u></b> not visually dominant or results in visual clutter;</li> </ol>	

		<p><b><u>In an historic setting in addition to the above the following will also be supported:</u></b></p> <ol style="list-style-type: none"> <li>5. <b><u>Non-illuminated or halo illuminated signage for applied and freestanding signage;</u></b> <del>Illuminated signage which is halo illuminated especially in sensitive historic settings;</del></li> <li>6. <b><u>Timber fascia signage;</u></b></li> <li>7. Traditional hanging signs in timber on a metal bracket; and</li> <li>8. Colours for shopfronts and signage <del>should be sympathetic to the character of a building or area. and very bright and garish colours. should be avoided.</del></li> </ol> <p>Proposals to alter or create a new shopfront, shutter or signs should take account of the guidance provided in the Shopfronts, Shutters &amp; Signage Design Guidelines for Gloucester Supplementary Planning Document and any future iterations.</p> <p><del>3.4.20</del> <b><u>4.6.31</u></b> The Shopfront, Shutters and Signage policy will ensure that schemes are well considered and make a positive contribution to the streetscene and wider urban environment. <b><u>Well-designed shopfronts and associated signage add to the character and quality of the city, change perceptions of local character and create a sense of place and pride.</u></b> Most people recognise the importance of an attractive central shopping core to the city and encourageing tourism and providing an attractive environment for business and residents. <b><u>Shopfronts should be designed to provide active building frontages with display windows, which contribute to the vibrancy of the shopping area and provide visual interest in the streetscene. Signage should be subtle and complement the built environment.</u></b> A high standard of shopfront design, construction and maintenance is one of the most effective ways of improving appearances and changing perceptions of local character and pride. Retention of historic shopfronts and sympathetic signage can help to protect the history of our city, provide opportunity for innovative and imaginative design and can result in a more attractive, richly varied and prosperous environment for residents, traders, workers and visitors alike.</p> <p><b><u>4.6.32</u></b> In all cases, both in an historic setting or in a more modern setting, it is important that shopfronts and signage are well proportioned, and <b><u>the design and materials will need to take into account the character</u></b></p>	
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MM28	<p>Natural Environment – Introduction and context</p> <p>Paragraph 3.5.2</p> <p>New paragraph</p>	<p><del>3.5.2</del> <b>4.5.2</b> At a local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. In July 2019, the City Council declared a climate emergency, committing to make the city carbon neutral by 2050 and the Council's activities by 2030. All the policies aim, directly or indirectly, to address climate change. With effective implementation on the ground, these policies will make a difference locally even if the results seem small when weighed against the global climate change scenario. There is a push to protect our most valued natural environments and species and to green our urban neighbourhoods with more trees and more green roofs/walls. In doing this we cool the city, create more attractive places, encourage wildlife and tackle air pollution and associated health problems. The plan seeks better quality green/<b>blue</b> infrastructure in Gloucester and areas where nature can recover and thrive.</p> <p><b>4.5.3 Part of the area covered by the Gloucester City Plan lies within the South West Marine Plan area. Decisions on any development likely to affect this area should take the South West Marine Plan, and the Marine Policy Statement, into account in accordance with s58 of the Marine and Coastal Access Act. The Marine Management Organisation (MMO) should be consulted as appropriate. Also see the requirement in the supporting text for Policy E7 'Renewable energy potential of the River Severn and canal'.</b></p>
MM29	<p>Policy E1 – Landscape character and sensitivity</p> <p>Paragraphs 3.5.5 and 3.5.6</p>	<p>Policy E1: Landscape character and sensitivity</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Development proposals in areas of Gloucester outside of the Joint Core Strategy (JCS) Landscape Characterisation and Sensitivity Analysis (supporting JCS Policy SD6) will be judged on their own merits. Applicants will be expected to adopt a balanced approach,</p> </div>

		<p>providing for housing, employment and/or other needs whilst seeking to protect and enhance features of the local landscape which contribute to a sense of environmental quality and local distinctiveness.</p> <p>Trees, hedgerows and areas of green (not otherwise protected) but which contribute to local landscape character should, where at all possible, be retained and utilised to enhance development. Applications should make clear how retained features will be effectively managed and maintained in the future.</p> <p>For major development proposals, a Landscape Visual Impact Assessment will be required where it is considered that the local landscape is particularly sensitive.</p> <p>3.5.5 — This policy has clear links to JCS Policy SD6 Landscape and the associated evidence base namely the report: Landscape Characterisation Assessment and Sensitivity Analysis. This evidence focused the sensitivity analysis on the fringes of the city but excluded those within the urban area.</p> <p>3.5.6 — This policy is focused on development sites in their wider landscape context; it's focus — is on the wider setting, character and sensitivity which can be important even when assessing small schemes.</p>
MM30	<p>Policy E2 – Biodiversity and geodiversity</p> <p>Paragraph 3.5.8</p>	<p>Policy <u>E21</u>: Biodiversity and geodiversity</p> <p>Development proposals must demonstrate the conservation of biodiversity, in addition to providing net gains appropriate to the ecological network. Potential adverse impacts on natural environment assets, including the connectivity of the ecological network, must be avoided or satisfactorily mitigated in line with the objectives of the Gloucestershire Local Nature Partnership or a future equivalent body.</p> <p><del>3.5.8</del> <b>4.5.7</b> In accordance with the NPPF, the City Council seeks to protect and enhance the ecological network, improving the biodiversity of sites by achieving net biodiversity gains from development. Developers should demonstrably follow the mitigation hierarchy, which should be designed to maintain and, where possible,</p>

		<p>improve the connectivity of the network. The appropriate type and level of provision will be a matter for the City Council in consultation with bodies such as the Local Nature Partnership (LNP).</p>
MM31	<p>Policy E3 – Nature Recovery Area</p> <p>Paragraph 3.5.16</p>	<p>Policy <del>E3</del><u>2</u>: Nature Recovery Area</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>The Severn Vale Nature Recovery Area (NRA) as shown on the policies map has been identified as an area for biodiversity offsetting as part of achieving biodiversity net gain when proposals cannot deliver enhancements on site or at priority Green Infrastructure projects.</p> <p>Development proposals within the NRA, or in an area ecologically related to it, should identify the biodiversity constraints and opportunities. Applicants should show how the proposal will help to achieve net gain for biodiversity in keeping with <b>identified</b> the species and habitat priorities <del>identified in consultation with the Local Nature Partnership (LNP) or future equivalent body.</del></p> </div> <p><del>3.5.16</del> <b>4.5.14</b> Target species currently identified for the Severn Vale NRA are: Brown Hare, Otter, Water Vole, Reed Bunting, Farmland Birds, Curlew, Herring gull, True Fox Sedge, Bullfinch, Bewick Swan, all bat species, Great Crested Newt, Lesser Spotted Woodpecker, House Sparrow, Starling, Noble Chafer, Mistletoe Marble Moth and the Harvest Mouse. The priorities may be subject to change due to ongoing renewal of evidence and will be determined by the LNP.</p>
MM32	<p>Policy E4 – Trees, woodlands and hedgerows</p> <p>New paragraphs</p>	<p>Policy <del>E4</del><u>7</u>: Trees, woodlands and hedgerows</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Development proposals should seek to ensure there are no significant adverse impacts on existing trees, woodlands or hedgerows and that every opportunity is taken for appropriate new planting on site, <b>including trees and hedgerows</b>. In the case of an unavoidable significant adverse impact on trees, woodlands and hedgerows, the</p> </div>

		<p>developer must provide for measurable biodiversity net gain on site, or if this is not possible:</p> <p>At nearby Green Infrastructure projects/areas; or  In suitable areas of parks, open spaces, verges; or  Through the restoration or creation of traditional orchards, prioritising sites identified as opportunities for increasing the connectivity of the ecological network; or  As new or replacement street trees.</p> <p>Development which would result in the loss of irreplaceable habitats such as Ancient Woodland, Ancient Trees and veteran trees* will not be permitted except in wholly exceptional circumstances.</p> <p>On development sites where existing trees to be retained, applicants will be required to demonstrate how these trees will be protected through all phases of development. <del>It is expected that the protection measures will adhere to those contained within BS 5837:2012 Trees in relation to design, demolition and construction – recommendations, or subsequent revisions.</del></p> <p><b><u>All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would be inappropriate.</u></b></p> <p>All new planting, either on site or elsewhere in the city as part of biodiversity net gain must be provided to the satisfaction of the City Council.</p>	
<p><u>4.5.56 New planting should include measures for appropriate long-term maintenance. It is expected that the protection measures will adhere to those contained within BS 5837:2012 Trees in relation to design, demolition and construction – recommendations, or subsequent revisions. The Council’s Arboriculturist will advise.</u></p>			



		<p><u>4.5.57 Through planning conditions, for the protection of wild birds, developers should be dissuaded from using exclusion netting and encouraged to either retain woodland features or undertake works at appropriate times of year.</u></p> <p>* Veteran trees are defined as ‘trees that are of interest biologically, culturally or aesthetically because of their age, size or condition’ (Ministry of Housing, Communities and Local Government; Ancient trees and veteran trees: protecting them from development’, 2019). <u>For veteran trees root protection buffers should generally be greater than standard buffers. Again, the Council’s Aboriculturalist will advise.</u></p>
<p>MM33 MM63</p>	<p>Policy E5 – Green/blue infrastructure– Building with Nature</p> <p>Paragraphs 3.5.21 – 3.5.25</p> <p>New pargaraph</p>	<p>Policy E5<del>3</del>: Green/<b>Blue</b> Infrastructure:<del>Building with Nature</del></p> <div data-bbox="790 592 1895 810" style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Development must contribute towards the provision, protection and enhancement of Gloucester’s Green/<b>Blue</b> Infrastructure Network. Contributions should be appropriate and commensurate to the proposal. Major development proposals will be designed in accordance with ‘<del>Building with Nature</del>’ standards <b>recognised</b> standards.</p> </div> <p><del>3.5.21</del> <b>4.5.17</b> JCS Policy INF3 and the associated JCS Green Infrastructure Strategy (GIS) seek to connect the urban areas of Gloucester with the high-quality green/<b>blue</b> infrastructure (<del>GI</del>) assets of the Cotswold’s AONB and the Severn Vale. <del>GI</del> <b>Green/blue</b> infrastructure and <b>their</b> and its associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. <b>They</b> <del>it</del> also <del>has</del> <b>have</b> functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaption and amenity value. Importantly, <del>it</del> <b>local green/blue infrastructure</b> also contributes to mitigating recreational impacts on European designated sites, including Cotswold Beechwoods.</p> <p><b><u>4.5.18 Waterside areas, or areas along known flood routes, can act as Green Infrastructure, being used for recreation, amenity and environmental purposes, allowing the preservation of flow routes and flood storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives.</u></b></p> <p><del>3.5.22</del> <b>4.5.19</b> Development should contribute towards this objective, and to the broader network of <del>GI</del> <b>green/blue</b> corridors and assets across the city using SuDS, open space, green roofs and walls and tree</p>

		<p>planting. <b><u>It is important that blue infrastructure such as rivers, streams, canals, lakes, ponds, wetlands and floodplains are fully considered as important assets.</u></b></p> <p><del>3.5.23</del> <b>4.5.20</b> Development has the potential to block corridors resulting in the isolation of habitats from the ecological network which is a concern in an urban area such as Gloucester. The rivers, brooks, disused railway corridors, footpaths and open spaces form important corridors linking communities within the city and habitats to the wider countryside. These vital corridors need to be protected and where possible enhanced for their biodiversity value and as pedestrian/cycle routes through the city.</p> <p><del>3.5.25</del> <b>4.5.21</b> For major developments, the Council will expect developers to <b><u>design schemes in accordance with recognised standards, for example Building with Nature or the National Design Guide.</u></b> use 'Building with Nature' standards, to inform development. Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.</p>
<p>MM34</p>	<p>Policy E6 – Flooding, sustainable drainage and wastewater</p> <p>Paragraphs 3.5.27, 3.5.36 – 3.5.37, 3.5.44 – 3.5.45</p> <p>New paragraph</p>	<p>Policy <del>E6</del><b>4</b>: Flooding, sustainable drainage, and wastewater</p> <div data-bbox="788 807 1895 1134" style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Development shall be safe from flooding and shall not lead to an increase in flood risk elsewhere. In accordance with the National Planning Policy Framework, <del>flood risk</del> betterment shall be sought through the development process <b><u>opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.</u></b></p> </div> <p>Flooding</p> <p><del>3.5.27</del> <b>4.5.24</b> Gloucester has been identified as a 'Flood Risk Area' by the Environment Agency following a preliminary flood risk assessment for river, sea and reservoir flooding, carried out to meet the requirements of the European Floods Directive (2007/60/EC) (transposed into the Flood Risk Regulations (2009)). Flood Risk Areas are where the risk of flooding is likely to be significant at a national scale for</p>

		<p>people, the economy or the environment (including cultural heritage). As such, it is particularly important that Gloucester has robust policy with respect to flooding, sustainable drainage, watercourses and wastewater. All of Gloucester’s watercourses are considered to lack capacity during design rainfall events; any increase in surface water discharge from development sites therefore represents an increase in flood risk. <b><u>Flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within the development.</u></b></p> <p><b><u>Upstream Natural Flood Management</u></b></p> <p><b><u>4.5.33 Upstream Natural Flood Management (NFM) may be appropriate in some circumstances as this can achieve the complementary benefits of effective flood risk management and habitat creation. Watercourses in greenspaces, the rural/urban fringe and in appropriate designated areas should be considered.</u></b></p> <p>Climate Change</p> <p><del>3.5.36</del> <b><u>4.5.34</u></b> In calculating the attenuation volume requirements, the uplift on rainfall to allow for climate change shall be 40%, unless it can be demonstrated that the site is likely to revert to greenfield prior to 2070. It is expected that the Environment Agency climate change guidance will be updated in 2019/20 to incorporate the UK Climate Projections 2018 data (UKCP18). This is likely to increase the 40% requirement, and developments will be expected to adhere to the latest guidance, including any future upgrades to climate change guidance during the plan period.</p> <p><del>3.5.37</del> <b><u>4.5.35</u></b> For calculating the climate change uplift for river <b><u>both tidal and fluvial</u></b> flows (i.e. to determine the design flood level for <b><u>the appropriate lifetime of</u></b> a development which influences the <b><u>its design/layout</u></b> of the development including floor levels, flow routes, floodplain compensation and safe access and egress arrangements), developers should refer to the latest Environment Agency climate change guidance. Developers are encouraged to assess the Upper End allowances (currently 70% for the Severn River Basin District based on 100 years lifetime of development). Major regeneration projects and infrastructure development are expected to be designed to <b><u>incorporate</u></b> this level <b><u>as part of any mitigation measures.</u></b></p>
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		<p>Financial contributions towards flood risk management infrastructure</p> <p><del>3.5.44</del> <b>4.5.42</b> <u>For all developments in areas with known flooding issues, appropriate mitigation and construction methods will be required including, where appropriate, contributions towards maintenance of existing defenses that benefit the site, development or maintenance of existing flood warning services, developments of future flood alleviation projects and/or provision of upstream rural SuDS projects.</u> Where appropriate, in partnership with the Environment Agency and other flood risk management bodies, the Council will seek financial contributions towards flood risk management infrastructure. The advice within paragraph 56 of the NPPF relating to planning obligations shall be key to determining appropriateness. Such instances would be rare but could include cases where the safety of a development and/or the ability to access the development safely, relies upon flood defences, the Environment Agency’s Flood Warning System, or other flood risk management infrastructure.</p> <p><del>3.5.45</del> <b>4.5.43</b> The Environment Agency has experience of working with developers and Councils in Gloucestershire to secure financial contributions in such cases. Money secured through such planning obligations can be used towards maintenance and improvements of flood defences, provision and upkeep of river gauges (which support the Flood Warning Service), and other flood risk management projects. <u>Where appropriate, money will be secured through the appropriate funding mechanism for upstream Natural Flood Management.</u></p>
MM35	<p>Policy E7 – Renewable energy potential of the River Severn and the canal</p> <p>Paragraph 3.5.47</p>	<p>Policy E7<b>5</b>: Renewable energy potential of the River Severn and the canal</p> <div data-bbox="790 986 1895 1206" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Development proposals that utilise the renewable energy potential of the River Severn and the Gloucester and Sharpness Canal will be supported providing there will be no adverse impacts on commercial and leisure uses and on the biodiversity of watercourses and riparian habitats.</p> </div> <p><del>3.5.47</del> <b>4.5.45</b> Gloucester benefits both from a major river and a broad canal running through parts of the city. Through the use of heat exchange technologies there is the potential for significant benefits in terms of the heating and cooling of existing or future buildings. All applications proposing any water generated</p>

		<p>renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal &amp; River Trust and Natural England <b>and the Marine Management Organisation. Decisions on applications affecting the marine area must consider the South West Marine Plan and Martine Policy Statement in accordance with the Marine and Coastal Access Act.</b></p>
<p>MM64 MM63</p>	<p>Policy E8 – Development affecting Cotswold Beechwoods Special Area of Conservation  Paragraph 3.5.54</p>	<p>Policy <del>E8</del><b>6</b>: Development affecting Cotswold Beechwoods Special Area of Conservation</p> <div data-bbox="790 485 1895 1169" style="border: 1px solid black; padding: 10px;"> <p>Development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) (alone or in combination), and the effects cannot be mitigated.</p> <p>In order to retain the integrity of the SAC, and to provide protection from recreational pressure, all development that results in a net increase in dwellings will be subject to Habitats Regulations Assessment for likely significant effects. Any development that has the potential to lead to an increase in recreational pressure on the SAC will be required to identify any potential adverse effects and provide appropriate mitigation. This will be in accordance with the SAC mitigation and implementation strategy or through a Habitats Regulations Assessment.</p> <p>Development which is likely to generate road traffic emissions to air, which are capable of affecting the SAC, will be screened against the Habitats Regulations Assessment Framework in line with Natural England’s guidance ‘Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)’, or any future iteration.</p> </div> <p><del>3.5.54</del> <b>4.5.52</b> The Cotswold Beechwoods SAC lies within 200m of the A46. The ‘air pollution information service’ (APIS) website (<a href="http://www.apis.ac.uk">www.apis.ac.uk</a>) indicates that the SAC currently exceeds its critical loads and levels for nutrient nitrogen. Natural England have therefore advised that development proposals that may generate additional traffic along this route should take account of <b>its</b> Guidance Note NEA001 <b>(or any future</b></p>

		<p><b>iteration</b>). This will ensure that the most up-to-date information in line with the Habitats Regulations 2017 are referenced and that the information is consistent with the Wealden case law dealing with in combination effects.</p>
<p>MM36</p>	<p>Policy F1 – Materials and finishes</p> <p>Paragraphs 3.6.7 – 3.6.8</p>	<div data-bbox="871 376 1897 774" style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p>Development proposals should achieve high quality architectural detailing, <b>with</b> external materials and finishes that are locally distinctive. Developments should make a positive contribution to the character and appearance of the locality.</p> <p><b><u>The wider landscape should be respected in terms of the views into the city from Robinswood Hill, and the surrounding hills.</u></b></p> <p>Innovative modern materials will be encouraged where they <del>strongly compliment</del> <b>complement</b> local distinctiveness.</p> </div> <p><del>3.6.7</del> <b>4.6.7</b> Attention to detail can really make or hinder the overall design, appearance and <b>sense of</b> quality of a place. Particular attention <del>will</del> <b>should</b> be paid to: finishes, materials, <del>joins and fixing methods between materials, window sills (double sub-sill window sills are architecturally inappropriate), window reveals, window design, lintels, door design, the placement of meter boxes, flues, vents, chimneys, gutters and down water pipes, aerials, antenna and boundary treatments (although this list is not exhaustive)</del> <b>and the placement of external features to ensure the architectural design remains uncluttered, well designed and beautiful.</b></p> <p><del>3.6.8</del> <b>4.6.8</b> The wider landscape of a scheme needs to be carefully considered. New developments should avoid the use of light coloured or reflective roofing materials so that the development does not have undue prominence <b>or create glare,</b> when viewed from the <del>surrounding</del> <b>ing</b> landscape.</p>
<p>MM37</p>	<p>Policy F2 – Landscape and planting</p>	<div data-bbox="871 1315 1897 1353" style="border: 1px solid black; height: 24px; width: 100%;"></div>

	<p>New paragraph</p>	<p><b><u>Planning applications for <del>Major</del> development proposals where landscaping is to be considered,</u></b> must be accompanied by a landscape scheme, incorporating hard landscape and planting details. Such plans must <b><u>Planning permission will be granted for schemes that:</u></b></p> <ol style="list-style-type: none"> <li>1. Exhibit a design and choice of <b><u>Use high quality</u></b> hard materials, boundary treatment and planting appropriate to the particular location and existing landscape character, or create a new and distinctive character where this is currently lacking; and</li> <li>2. Retain and incorporate existing natural features such as trees, hedges and watercourses, where possible; and</li> <li>3. Ensure, in <del>appropriate developments, especially housing schemes,</del> that adequate space is provided for the planting and maturing of suitable large-scale trees <b><u>and hedgerows;</u></b> and</li> <li>4. Indicate <b><u>Incorporate well designed, suitable, and functional</u></b> areas of public open space and amenity land. <b><u>Plans must indicate which spaces</u></b> that are proposed for adoption and provide full details of who will be adopting and maintaining the spaces.</li> </ol> <p>Where appropriate, the use of native species in planting schemes will be required.</p>	
<p>MM38</p>	<p>Policy F3 – Community safety</p> <p>New paragraphs</p>	<p><b><u>4.6.12 Adequate space must be provided around trees and hedgerows to ensure that when they achieve maturity there is still plenty of space around them for them to thrive, be easily accessed and maintained, remain healthy and not cause any nuisance to the occupiers of nearby buildings. Leaving insufficient space can mean that trees and hedgerows fail to thrive and can lead to future requests for their removal.</u></b></p>	

		<p>Development proposals, including the associated public realm and landscaped areas, must be designed to ensure that community safety is a fundamental principle of the proposed development. This includes:</p> <ol style="list-style-type: none"> <li>1. Maximising natural surveillance; and</li> <li>2. Laying out the development in a way that creates secure perimeter blocks with back to back development; and</li> <li>3. Providing secure rear gardens; where there are rear accesses these are secure and private; and</li> <li>4. Parking on plot or to the front of active frontages that provide overlooking; and</li> <li>5. Creating attractive to use, safe and where appropriate vibrant streets which provide visual interest and active frontages, particularly at street level avoiding blank walls; and</li> <li>6. Footpaths <b>and cycle routes</b> that are well designed, lit, straight <b>direct</b> and overlooked.</li> </ol> <p><b><u>4.6.16 Lighting shall have low energy needs and be designed to ensure that it does not create excessive glare to highway users or to residential properties. Lighting that would have a detrimental impact on wildlife would not normally be permitted.</u></b></p> <p><b><u>4.6.17 If in exceptional circumstances rear parking courts are permitted, they should be well lit, overlooked, the same style as other parts of development, and restricted to a maximum of 10 spaces per court. Parking courts should only have one entrance/exit point to ensure that there is no reason for non-residents to travel through the court.</u></b></p>	
MM39	Policy F5 – Open plan estates	<p>Enclosure of front and side gardens and unusable strips of land will be <b>permitted</b> <del>allowed on existing</del> <b>in</b> open plan estates provided that the land to be enclosed does not adjoin a footpath link. <b>In all cases the</b> <del>and its enclosure does</del> <b>should</b> not harm</p>	



		the visual amenity, or community safety, <b>or degrade the ecological networks</b> of the locality.
MM40	<p>Policy F6 – Nationally Described Space Standards</p> <p>Paragraph 3.6.26</p> <p>New paragraph</p>	<p>Development proposals for new residential development (including change of use or conversions) must meet Nationally Described Space Standards <b><u>(or any future successor)</u></b>.</p> <p><del>3.6.26</del> <b>4.6.29</b> Gloucester City Council places great weight on the quality of life and health and wellbeing of its residents. For this reason, the NDDS have been adopted. Development proposals will be robustly assessed against the standards set out in Technical Housing Standards – Nationally Described Space Standard March 2015, or any standards revoking or superseding those standards. <b><u>Exceptions will only be made where the applicant can clearly demonstrate that the standards cannot be met because of the nature of the development, for example where it is a conversion of an existing building into new residential dwellings and meeting the standard would affect the structural integrity of the building.</u></b></p> <p><b><u>4.6.30 A transition period of 3 months will apply from the adoption date of the Gloucester City Plan. During this time the council will strongly encourage developers to meet the requirements of NDSS.</u></b></p>
MM41	<p>Sustainable living, transport and infrastructure – Introductory section</p> <p>Paragraphs 3.7.4 – 3.7.9</p> <p>New paragraphs</p>	<p><u>Climate change</u></p> <p><del>3.7.4</del> <b>4.7.4</b> Climate change is happening now; it is the issue of our times that cannot be ignored. The City Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step-change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.</p>

		<p><del>3.7.5</del> <b>4.7.5</b> Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.</p> <p><b><u>4.7.6 In order to address the climate emergency, and in compliance with JCS Policy SD3 Sustainable Design and Construction, all applications for new buildings will be expected to demonstrate that all reasonable techniques have been utilised to adapt to and mitigate the effects of climate change.</u></b></p> <p><b><u>4.7.7 JCS Policy SD3 requires the submission of an Energy Statement as well as a Waste Minimisation Statement for all major development. The City Plan strongly encourages all applications for new buildings to supply an Energy statement and a Waste Minimisation Statement.</u></b></p> <p><b><u>4.7.8 The GCP strongly encourages energy efficiency measures allied with the appropriate use of renewable energy in new buildings and the retrofitting of existing buildings. It is considered that, as technologies and energy markets evolve, there are increasing opportunities to utilise renewables in sustainable design and construction without excessive costs.</u></b></p> <p><del>3.7.6</del> <b>4.7.9 More specifically,</b> climate change is a theme that runs through the whole of GCP and is a Strategic Objective of the JCS. A number of policies in this plan address climate change and its impacts either directly or indirectly. These include:</p> <ul style="list-style-type: none"> <li>• Requiring new developments to make overall improvements to the natural environment (Policy A1)</li> <li>• Protecting existing trees, woodlands, hedgerows and ensuring every opportunity is taken to increase new planting. (Policy E7)</li> <li>• Requiring development to contribute towards the protection and enhancement of the Green <b>and Blue</b> Infrastructure Network. (Policy E3)</li> <li>• Requiring major development to be designed in accordance with ‘Building with Nature’ <b>recognised Green/Blue Infrastructure standards.</b> (Policy E3)</li> <li>• Requiring developments are safe from flooding and contribute to flood risk betterment. (Policy E4)</li> </ul>
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		<ul style="list-style-type: none"> <li>• Requiring all development to incorporate SUDs and facilitate watercourse reconstruction. (Policy E4)</li> <li>• Ensuring appropriate attenuation volume rates to allow for the increased rainfall from climate change. (Policy E4)</li> <li>• Supporting the use of the River Severn and canal for renewable energy generation. (Policy E5)</li> <li>• Requiring new landscape and planting to be climate change adaptable. (Policy F2)</li> <li>• Requiring development proposals to conserve and provide net gains to biodiversity. (Policy E1)</li> <li>• <del>Requiring electric vehicle charging points in every new home with a garage or on plot parking space, and 2% of spaces within 100 or more car parking spaces. (Policy G2)</del></li> <li>• Protecting and improving cycle lanes and maximising opportunities for sustainable active travel. (Policy C1, G3, G4)</li> <li>• Introducing the enhanced water efficiency standards reducing water consumption for each new home. (Policy G7)</li> <li>• Protecting allotments and providing new allotments where there is a need. (Policy C2)</li> <li>• Using green infrastructure to absorb dust and air pollutants from major developments, and increasing planting in AQMA, and around schools and hospitals. (Policy C5)</li> </ul> <p><del>3.7.7</del> <b>4.7.10</b> The City Council strongly supports proposals that incorporate sustainable design and construction measures, including renewable energy generation within new development and within development sites.</p> <p><del>3.7.8</del> <b>4.7.11</b> Policies SD3: Sustainable Design and Construction, SD4: Design Requirements, INF2: Flood Risk Management, and INF3: Green Infrastructure of the JCS also provide climate change requirements.</p> <p><del>3.7.9</del> <b>4.7.12</b> This policy also links to the recently published the Gloucestershire Energy Strategy 2019, <a href="https://www.gfirstlep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf">https://www.gfirstlep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf</a> This strategy sets out nine key building blocks. The fifth is: Developing Stronger Planning Policies. These policies should “...enable more local renewables and require zero-carbon and smart enabled new developments. To meet long-term targets, new planning policies need (a) to ensure that all new developments contribute to reducing carbon emissions rather than increasing them and are resilient to climate change and (b) to enable the growth of renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities.” <b><u>the Gloucestershire Climate Change Strategy 2019 and The Gloucester Climate Change Strategy and future iterations.</u></b></p>
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<p>MM42</p> <p>MM63</p>	<p>Policy G1 – Sustainable transport</p> <p>Paragraphs 3.7.10 – 3.7.12</p> <p>New paragraphs</p>	<p>Policy G1: Sustainable transport <b><u>and parking</u></b></p> <p>The City Council strongly supports and encourages improvements to the sustainable transport network.</p> <p><b><u>In all development the following measures will be prioritised over the parking of private vehicles:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>On-street space which is designed and allocated for pedestrians, cyclists, mobility users and deliveries.</u></b></li> <li>• <b><u>Bus stops and bus priority measures.</u></b></li> </ul> <p><b><u>Cycle Parking</u></b></p> <p><b><u>For residential development a minimum of 1 cycle parking space per 1 bedroom dwelling and 2 spaces per dwelling with more than 1 bedroom is required. For Houses of Multiple Occupancy (HMO) cycle parking shall be provided at a ratio of 1 space per bedroom.</u></b></p> <p><b><u>In all development cycle parking must be sheltered, secure and easily accessible. Cycle parking in residential garages will only be accepted where the garage has a minimum internal dimension of 6m x 3m.</u></b></p> <p><b><u>Car Parking</u></b></p> <p><b><u>All new development will provide car parking to a level and design that is appropriate for the local context taking into account:</u></b></p> <ol style="list-style-type: none"> <li>a. <b><u>The accessibility of the development;</u></b></li> <li>b. <b><u>The type, mix, and use of development;</u></b></li> <li>c. <b><u>Any parking restrictions or restraints in the area;</u></b></li> <li>d. <b><u>The availability and opportunities for public transport;</u></b></li> </ol>
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		<p>e. <u>Local car ownership levels; and</u>  f. <u>The need to ensure adequate provision of spaces for charging plug-in and other ultra-low emissions vehicles.</u></p> <p><u>The minimum car parking space is 2.4m x 4.8m. A minimum of 6m is required in front of a garage door. Tandem parking spaces for individual residential dwellings is limited to 2 vehicles and must not overhang the footpath. For ease of use both spaces must serve the same dwelling. The maximum number of adjoining car parking spaces in a row, adjacent to a footway, is 6 spaces.</u></p> <p>The Council will work closely with Gloucestershire County Council and other organisations regarding all local transport matters. The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and the Gloucester City Plan Highways Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.</p> <p>The policies set out in the JCS and the Gloucestershire Local Transport Plan will also be used for development management matters and planning application decision making.</p> <p>New development shall provide car parking and cycle provision in accordance with the latest version of Gloucestershire Manual for Streets and any subsequent amendments.</p> <p>The City Council strongly supports and encourages improvements to the sustainable transport network.</p>	
		<p>3.7.10 The provision of transport projects and improvements is a fast moving and changing activity and closely linked to more general development delivery activities especially those that are planned through the JCS. Setting policies in the city plan for each specific piece of potential transport infrastructure is not considered necessary and would become out of date very quickly. The Gloucestershire Local Transport Plan performs this role better than the GCP can and will be frequently updated. The JCS also provide a transport strategy</p>	

		<p>and policy context for the consideration of transport issues in the development management process. This is appropriate given the significance of joint working in the county and the likelihood that this will continue. In addition, to support the delivery of the quantum of development proposed within the city, a Highways Assessment has been undertaken. This identifies interventions necessary on the highway network necessary to support the GCP.</p> <p><b><u>4.7.13 The Council will work closely with Gloucestershire County Council and Highways England as transport and highways authorities regarding all local transport matters. The Council will have regard to the Gloucestershire Local Transport Plan, Transport Implementation Strategy, Infrastructure Delivery Plan and Gloucester City Plan Highways Assessment regarding priority projects for implementation, including the capital and revenue funded transport projects identified in the city.</u></b></p> <p><b><u>4.7.14 In accordance with Policy INF1 of the adopted JCS, 'Planning permission will be granted only where the impact of the development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highways Authorities and in line with the Local Transport Plan.'</u></b></p> <p><del>3.7.11</del> <b><u>4.7.15</u></b> At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies with the JCS and GCP.</p> <p><del>3.7.12</del> Further information on Car Parking in new residential developments, Cycle Storage, Active Design, Air Quality and Pollution can be found in the Design and Health and Wellbeing sections of this plan.</p> <p><b><u>Cycle parking design</u></b></p> <p><b><u>4.7.16 Cycle parking must be sheltered, secure and easily accessible. Designers should in the first instance look to design facilities located close to the primary entrance of the dwelling or building. In all cases to be easily accessible the cycle parking should be located closer to the main entrance than the car parking that serves that building or dwelling. This will require careful design to present an attractive facility. In some circumstances, for example where dwellings do not have front gardens or in the case of flats and HMOs</u></b></p>
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		<p><u>where the number of spaces may be greater than the physical space available at the front of the property, parking in the rear garden will be accepted where the route is direct and as short as possible. It is not considered acceptable to negotiate 90-degree bends and/or several doors with a bicycle. Access through the dwelling to the rear garden is not considered acceptable.</u></p> <p><b>Car Parking</b></p> <p><b><u>4.7.17 The quantum of car parking will depend on the specific circumstances of the site. This will ensure that effective and efficient use of land is made. Those development that are centrally located, close to public transport, and in areas with low car ownership, will not require as much land dedicated to car parking as more suburban sites with high levels of car ownership and limited access to public transport.</u></b></p> <p><b><u>4.7.18 Where a location can be shown to support a ‘no car’ or ‘low car’ approach then an approved Travel Plan will be required in accordance with Policy INF1 of the JCS. This will identify specific outcomes, targets and measures and set out clear future monitoring and management arrangements. This will be especially important in areas that are already subject to parking restrictions where on-street parking or access to existing parking permit schemes may not be possible. ‘No car’ and ‘low car’ developments will require, as part of the Travel Plan, a communication strategy to ensure that new residents understand the limited availability of car parking spaces. Where some spaces are available it must be made clear who those spaces are to be used by.</u></b></p> <p><b><u>4.7.19 Minimum sizes are provided to ensure that spaces are useable and that tandem car parking spaces do not impact on the pedestrian environment or are designed in a way that would inconvenience the user.</u></b></p> <p><b><u>4.7.20 Further information on car parking in terms of the configuration of car parking courts and community safety can be found in City Plan Policy F3: Community Safety. Policy SD4 of the JCS sets out the hierarchy of transport modes and the design approach that should be undertaken. Applicants are also encouraged to refer to the latest version of Gloucestershire Manual for Streets and the Gloucestershire Local Transport Plan for further guidance.</u></b></p>
MM43	Policy G2 – Charging infrastructure for electric vehicles	<p>Policy G2: Charging infrastructure for electric vehicles</p> <div style="background-color: #cccccc; width: 100%; height: 20px; margin-top: 10px;"></div>

	<p>Paragraphs 3.7.13 – 3.7.15</p>	<p>An electric vehicle charging point/socket will be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage.</p> <p>In all other new residential properties, the provision of electric vehicle charging points/sockets will be strongly encouraged where, in the opinion of the City Council, it is reasonable to do so and where it is technically feasible.</p> <p>For non-residential development which provides 100 or more car parking bays, at least 2% of bays should be utilised for the provision of rapid charging points for electric vehicles. Exceptions, will only be made where the applicant can demonstrate the local electricity network is technically unable to support this.</p> <p><del>3.7.13</del> JCS Policy SD4 ‘Design requirements’ promotes, where feasible, facilities for charging plug-in and other ultra-low emission vehicles for the scale of development where a masterplan is required. The GCP builds on this, based on the following:</p> <ul style="list-style-type: none"> <li>● <del>The NPPF (2019) at Para 105 encourages policies to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicles.</del></li> <li>● <del>Under Government plans, the sale of new petrol and diesel vehicle will be prohibited by 2040 and possibly sooner.</del></li> <li>● <del>Global vehicle manufacturers are already making a major shift to electric or hybrid vehicle production and during the plan period there is likely to be major technological change at a rapid pace. Towns and cities across the UK are putting in new infrastructure and Gloucester cannot afford to get left behind.</del></li> <li>● <del>Meeting targets outlined in the Government’s 25 Year Environment Plan especially relating to ‘Clean air’ and ‘Mitigating and adapting to climate change’.</del></li> <li>● <del>Existing air quality issues within the city, including the existence of four Air Quality Management Areas.</del></li> </ul> <p><del>3.7.14</del> In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a single phase 13-amp socket. This is likely to be upgraded by the homeowner as technologies change.</p>	
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		<p><del>3.7.15 Exemptions are made for residential flats/apartments and residential care homes with communal parking areas where, due to high costs and issues of security, servicing and maintenance it may not always be suitable or feasible to require charging points.</del></p>
MM44 MM63	<p>Policy G3 – Cycling</p> <p>Paragraph 3.7.16</p>	<p>Policy G3<del>2</del>: Cycling</p> <div style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Cycle lanes and paths that make up Gloucester’s existing cycle network will be protected and development that promotes new routes and improved cycle security will be encouraged. <b>All developments must provide safe and secure access by cycle.</b></p> <p>The Council wish to encourage comprehensive city-wide cycling initiatives in line with the County Council’s Local Transport Plan. Working with Gloucestershire County Council and other partners, The Council will support development leading to:</p> <ol style="list-style-type: none"> <li>1. Improvement of cycle routes to sustainable transport hubs.</li> <li>2. Cycle access improvements to the: <ol style="list-style-type: none"> <li>a. Outer ring road corridor in Gloucester</li> <li>b. Canal towpath</li> <li>c. A40 corridor between Gloucester and Cheltenham.</li> </ol> </li> </ol> </div> <p><del>3.7.16</del> <b>4.7.25</b> The extent of Gloucester’s existing cycle lanes and paths are outlined in the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017) <b>and it is important that this document is referred to in considering development that promotes or protects cycling infrastructure in the city.</b> The four priorities highlighted in the policy reflect recent work undertaken by the County and City Council and the project delivery priorities on page 23 of the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017).</p>
MM45 MM63	<p>Policy G4 – Walking</p>	<p>Policy G4<del>3</del>: Walking</p> <div style="border: 1px solid black; height: 20px; background-color: #f0f0f0;"></div>

		<p>The City Council will support development proposals that protect and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council’s administrative boundary.</p> <p>New footpaths that link neighbourhoods to each other and to areas of open space and Green Infrastructure will be supported subject to acceptability against other plan policies. <del>Working with Gloucestershire County Council and other partners,</del> The City Council will support development leading to the improvement of walking routes to sustainable transport hubs.</p> <p>New <del>public realm</del> development <del>should</del> <b>must</b> reflect the fact that pedestrians are at the top of the road user’s hierarchy.</p> <p>Proposals that disrupt walking desire lines, reduce the pedestrian legibility or reduce pedestrian connectivity will not generally be supported.</p>	
MM46	<p>Policy G6 – Telecommunications infrastructure</p> <p>Paragraphs 3.7.23 – 3.7.24</p>	<p>Policy <del>G65</del>: Telecommunications infrastructure</p> <p>Development proposals for telecommunications infrastructure <b><u>will be permitted where it can be demonstrated that</u></b> <del>must demonstrate that</del> the development <b><u>is sympathetically designed and</u></b> would not have an adverse impact upon the environment (including heritage assets, biodiversity, local amenity, the landscape and its setting).</p> <p>In siting any equipment, every effort must be made to minimise visual impact. Proposals will be expected to use/share existing <b><u>masts</u></b>, structures <del>of</del> buildings where possible. <b><u>Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.</u></b></p> <p>Where an installation becomes redundant for telecommunication purposes, the infrastructure and all associated apparatus and structures shall be removed by the</p>	

		<p>developer or operator, and the site reinstated in accordance with proposals approved at the application stage.</p> <p><del>3.7.23</del> <b>4.7.32</b> The City Council supports the introduction of modern <b><u>an advanced, high quality and reliable</u></b> communications networks, which are essential to support the growing demand for improved communications. However, this has land-use implications in the form of structures such as masts, aerials and satellite dishes and this in turn has implications for the surrounding area. <b><u>To minimise the visual impact of telecommunications infrastructure, the number of sites for such installations, shall be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.</u></b></p> <p><del>3.7.24</del> <b>4.7.33</b> Planning applications for new telecommunications infrastructure will be required to balance environmental, visual, <b>and</b> amenity <del>and health</del> concerns with the future development needs of the mobile technology networks. Mobile phone masts and antennas should always be located and designed to respect their context and the amenity of those living, working or spending time in the locality.</p>
MM47	<p>Policy G8 – Review mechanism</p> <p>Paragraph 3.7.30</p>	<p><del>3.7.30</del> Priority will be given to the delivery of affordable homes over other policy requirements.</p>
MM48(A)	<p>Site allocations</p> <p>Paragraphs 4.1 – 4.3, 4.7, 4.10 – 4.16</p>	<p><del>4.5</del>. SITE ALLOCATIONS</p> <p>Introduction and context</p> <p>Development needs and strategy</p> <p><del>4.1</del> The NPPF requires that local authorities should positively plan to deliver development needs. For Gloucester, these development needs are set by the strategic level Joint Core Strategy (JCS), which was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. Between 2011 and 2031, the development needs are;</p>

		<ul style="list-style-type: none"> <li>● Policy SP1 – The need for new development’: 14,357 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, 192 hectares of B-Class employment land to support approximately 39,500 new jobs.</li> <li>● Policy SD2 – Retail and City / Town Centres’: 45,500 sq m (net) of comparison goods retail floorspace and 3,600 sq m (net) of convenience goods floorspace.</li> <li>● Policy SD13 – ‘Gypsies, Travellers and Travelling Showpeople’: This policy sets out a criteria-based policy for the assessment of planning applications for these communities. The supporting text sets out accommodation needs arising from the Gloucestershire Gypsy and Traveller Accommodation Assessment (2016). For Gloucester, it identifies a need of two Gypsy pitches and 16 Travelling Showpeople plots arising from Gloucester’s existing communities. In relation to transit pitches for those members of the community travelling through the area, the GTAA recommends that there is no need for such provision and that the authorities should instead consider the use of ‘temporary tolerated stopping places’.</li> </ul> <p>4.2 — Policy SP2 ‘Distribution of new development’ of the JCS, sets out the delivery strategy, which is the delivery of development that maximises urban capacity, alongside the identification of urban extensions (strategic allocations) to the main urban areas of Gloucester and Cheltenham. This is so as to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to balance employment and housing needs, and provide new development close to where it is needed and where it can benefit from the existing and enhanced sustainable transport network.</p> <p>4.3 — Most strategic allocations are in Tewkesbury Borough; this reflects the fact that Gloucester has a very limited land supply and in order to meet development needs, it has been necessary to work in partnership with Tewkesbury Borough Council to identify urban extensions within that local authority area. One strategic allocation, Winnycroft, is located within the administrative area of Gloucester City.</p> <p>Delivery</p> <p>4.7 <b>5.4</b> In total, the GCP makes <b>2218</b> site allocations for residential development, employment development, mixed-use development, a school and community use. The site allocations <b>are</b> underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Transport Assessment and</p>
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Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery. A summary of the site allocations is provided below:

#### Housing

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

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

4.11 Further information is available from the housing monitoring report (September 2019), available to download from the City Council's website.

4.12 Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to 900 dwellings. This shortfall is acknowledged and accepted within the JCS. Policy REV01 'Gloucester and Tewkesbury Housing Supply Review' states the need for an immediate review of housing supply and that 'The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities'.

4.13 The JCS Review has already commenced with an 'issues and options' consultation taking place during November 2018 and January 2019. Further information is available from the JCS website.

#### Employment land

		<p>4.14 — From an employment perspective, a total of 14.6 hectares is allocated, either as 100% ‘B Class’ employment sites or as part of wider mixed-used schemes. Together, they will deliver a substantial amount of employment floorspace. Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p> <p>Retail and city / town centres</p> <p>4.15 — Policy SD2 ‘Retail and City / Town Centres’ provides the current JCS position. However, the policy is subject to an immediate review; criterion 7 of the policy states ‘Following adoption of the JCS, this policy will be subject to an immediate review. The single-issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.’ As mentioned above, this review has already commenced with an ‘issues and options’ consultation held between November 2018 and January 2019. Consultants have been appointed to undertake the necessary evidence and support the JCS authorities in taking forward the emerging plan.</p> <p>Gypsy and traveller communities</p> <p>4.16 — As identified above, there is a need for additional permanent Gypsy and Travelling Showpeople accommodation to meet the needs of Gloucester’s existing communities. The City Council has reviewed all possible site opportunities, including their own land assets and those submitted through ‘call for sites’, and it has been concluded there are none that are suitable, available and viable within the city. A request has been submitted to all neighbouring authorities, under the ‘duty to cooperate’, for help in identifying deliverable sites.</p>
MM48(B)	Site allocations  Paragraph 4.8	<p>4.8 <u>5.5</u> The potential capacity of a site to accommodate new development has been determined in one of two ways; the first is to draw on existing masterplans or proposal from which a realistic capacity can be identified; the second is to use a ‘density calculation’, whereby an allowance is made from the gross site area for infrastructure and community uses, and a calculation then made of the likely capacity of the</p>

		<p>remainder. <b><u>The housing capacities identified in Policy SA are indicative and do not represent a ceiling. Proposals should be considered in the context of Policy SD10 ‘Residential Development’ of the adopted JCS and Policy A1 of the GCP ‘Effective and efficient use of land and buildings for housing’, which seek to ensure the best use is made of land, consistent with its location and character.</u></b></p>																																	
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MM49(D)	Site allocations	<p><del>Policy</del> <b>Site Allocation Statement</b> SA18<u>15</u>: Jordan's Brook House</p> <table border="1"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Barnwood / GL4 3TL / E: 386354 N: 217605</td> </tr> <tr> <td>Gross Site Area:</td> <td>0.85 ha.</td> </tr> <tr> <td>Allocation:</td> <td>Residential: Approximately <del>20</del> <b>10</b> dwellings.</td> </tr> </table>	Ward / Postcode / GeoRef	Barnwood / GL4 3TL / E: 386354 N: 217605	Gross Site Area:	0.85 ha.	Allocation:	Residential: Approximately <del>20</del> <b>10</b> dwellings.
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MM50(A)	Site allocations	<p><del>Policy</del> SA08: King's Quarter</p> <table border="1"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Westgate / GL1 1SZ / E: 383463 N: 218589</td> </tr> </table>	Ward / Postcode / GeoRef	Westgate / GL1 1SZ / E: 383463 N: 218589				
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		Gross Site Area:	4.5 ha.	
		Allocation:	Mixed use development: residential, retail, employment, hotel and leisure use, city centre parking.	
		<p><u>Description and overview</u></p> <p>King's Quarter is the City Council's top regeneration priority. The site is in the heart of the city centre and links the primary shopping area with the recently completed transport hub (bus station) and railway station. The site is substantial in size, comprising King's Square, The Oxbode and St Aldate Street, as well as parts of Northgate Street, Spread Eagle Road, Market Parade, Station Road and Bruton Way. King's Quarter has the opportunity to create lost connections between the bus and train stations, with a high-density mixed-use scheme of a range of different main town-centre uses including commercial floorspace, a hotel, offices, residential dwellings and city centre parking.</p>		
		<p><u>Site specific requirements and opportunities</u></p> <p><u>Design and layout</u></p> <ul style="list-style-type: none"> <li>● Views to the Cathedral should be enhanced and maintained.</li> <li>● Direct connectivity between the bus and arail station across to Kingswalk, The Oxbode and St Aldates to be maintained.</li> <li>● Density should be increased particularly around the edges of any open spaces. The current height of building ratio to open space is incongruous.</li> </ul> <p><u>Open space</u></p> <ul style="list-style-type: none"> <li>● Retention and enhancement of King's Square as a multi-use events space and focus within the city centre.</li> </ul> <p><u>Historic environment</u></p> <ul style="list-style-type: none"> <li>● Site located within the City Centre Conservation Area and adjacent to the London Road Conservation Area; new development must therefore positively respond to both Conservation Area Appraisal and Management documents.</li> <li>● Detailed Historic Environment Assessments: Potential for significant Roman and other era archaeological interest. The Scheduled Monument of Whitefriars is within the site area.</li> </ul> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>● Green roofs/walls should be utilised on this site.</li> </ul>		

		<ul style="list-style-type: none"> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><u>Flood risk</u></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).</li> </ul>							
MM50(B)	Site allocations	<p>Policy SA12: Land at Rea Lane, Hempsted</p> <table border="1" data-bbox="696 707 1995 820"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Westgate / GL2 5XA / E: 381320 N: 216812</td> </tr> <tr> <td>Gross Site Area:</td> <td>1.2 ha.</td> </tr> <tr> <td>Allocation:</td> <td>Approximately 30 dwellings.</td> </tr> </table> <p><u>Description and overview</u> Greenfield site on the edge of Hempsted village. The site offers the opportunity for a small residential development located on the edge of the city and outside of the cordon sanitaire.</p> <p><u>Site specific requirements and opportunities</u></p> <p><u>Design and layout</u></p> <ul style="list-style-type: none"> <li>• Any development will need to respond sensitively to the landscape character of the area.</li> <li>• Buildings should be no more than two-storey and detailed with materials that complement the landscape.</li> <li>• Trees, hedgerows and SUDs should be utilised to soften the development and protect views into the site from the open countryside.</li> </ul> <p><u>Historic environment</u></p> <ul style="list-style-type: none"> <li>• Written scheme of Investigation for archaeological evaluation.</li> <li>• Mitigate potential impacts to the Hempsted Conservation Area and its setting.</li> </ul>	Ward / Postcode / GeoRef	Westgate / GL2 5XA / E: 381320 N: 216812	Gross Site Area:	1.2 ha.	Allocation:	Approximately 30 dwellings.	
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		<p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• The adjacent land has some potential for a Local Wildlife Site and opportunities should be explored. Orchard restoration is a possibility as there is restored orchard to the south and remnant orchard to the west. Additionally, improvements could focus on hedgerows, lowland meadow, coastal &amp; floodplain grazing marsh, wet woodland, pond and margins.</li> <li>• For the protection of hedgerows, foraging bats and breeding birds: A level of habitat protection and buffering. In terms of enhancement: Protection of sensitive habitats during construction. Enhancement of existing habitats through additional planting. Development of a sensitive lighting strategy to reduce light spill.</li> <li>• For the protection of badgers, breeding birds and hedgehog: Hedgerow retention and buffering, as well as provision of green open space. In terms of enhancement: Protection during construction, enhancement of existing habitats through additional planting (shrub and/or wildflower grassland). Provision of nesting boxes to increase opportunities for breeding birds, roosting boxes to increase opportunities for bats, and log piles to provide refuge and foraging for hedgehogs.</li> <li>• For the protection of Great crested newts and reptiles: Creation of new pond and species-rich wildflower grassland. Non-licensed avoidance measures to be included within an Ecological Construction Method Statement and provision of log piles to increase foraging and refuge opportunities.</li> </ul>							
MM51(A)	Site allocations	<p>Policy SA07: Lynton Fields, Land East of Waterwells Business Park</p> <table border="1" data-bbox="696 1031 1995 1145"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Quedgeley Fieldcourt / GL2 2SF / E: 381831 N: 212615</td> </tr> <tr> <td>Gross Site Area:</td> <td>2.0 ha.</td> </tr> <tr> <td>Allocation:</td> <td>B-Class employment uses</td> </tr> </table> <p><u>Description and overview</u> The site comprised mainly improved grassland with buildings related to the poultry business and to small scale industry. There are car storage facilities to the north and east, industrial buildings to the west and three large villas to the south. It is located to the east of the very successful Waterwells Business Park and offers the opportunity for an extension to this.</p> <p><u>Site specific requirements and opportunities</u></p>	Ward / Postcode / GeoRef	Quedgeley Fieldcourt / GL2 2SF / E: 381831 N: 212615	Gross Site Area:	2.0 ha.	Allocation:	B-Class employment uses	
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		<p><u>Design and layout</u></p> <ul style="list-style-type: none"> <li>• Any development should be laid out to mitigate any potential impacts to the existing residential properties to the south of the site.</li> <li>• The transition between employment and residential will need to be carefully considered and appropriately designed.</li> <li>• Development should be set back from Nass Lane to preserve its character.</li> <li>• Potential for widening Nass Lane to provide footways and cycling routes should be fully explored.</li> <li>• Consider opportunities for improving public transport.</li> </ul> <p><u>Historic environment</u></p> <ul style="list-style-type: none"> <li>• Archaeological Assessment.</li> </ul> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>• Enhancement to species rich grassland connectivity through site and enhancement to watercourse.</li> <li>• Bat surveys: Building inspections (and any required emergence/re-entry surveys) and activity survey.</li> <li>• Bird surveys: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul> <p><u>Flood risk</u></p> <ul style="list-style-type: none"> <li>• A site specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).</li> </ul>			
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MM52(A)	Site allocations – Minerals Consultation Areas	Policy <u>Site Allocation Statement</u> SA01: Land at the Wheatridge  <div style="border: 1px solid black; padding: 5px;"> <u>Mineral Consultation Area (MCA)</u> <ul style="list-style-type: none"> <li>• <u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></li> </ul> </div>								

MM52(B)	Site allocations – Minerals Consultation Areas	<p>Policy-<b>Site Allocation Statement</b> SA02: Land at Barnwood Manor</p> <div data-bbox="696 304 1995 523" style="border: 1px solid black; padding: 5px;"> <p><b>Mineral Consultation Area (MCA)</b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>
MM52(C)	Site allocations – Minerals Consultation Areas	<p>Policy-<b>Site Allocation Statement</b> SA03: Former Prospect House, 67-69 London Road</p> <div data-bbox="696 671 1995 890" style="border: 1px solid black; padding: 5px;"> <p><b>Mineral Consultation Area (MCA)</b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>
MM52(D)	Site allocations – Minerals Consultation Areas	<p>Policy-<b>Site Allocation Statement</b> SA04: Former Wessex House, Great Western Road</p> <div data-bbox="696 1038 1995 1257" style="border: 1px solid black; padding: 5px;"> <p><b>Mineral Consultation Area (MCA)</b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>

<p>MM52(E)</p>	<p>Site allocations – Minerals Consultation Areas</p>	<p>Policy <u>Site Allocation Statement SA1008</u>: Former Fleece Hotel &amp; Longsmith Street Car Park</p> <div data-bbox="696 268 1995 485" style="border: 1px solid black; padding: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>
<p>MM52(F)</p>	<p>Site allocations – Minerals Consultation Areas</p>	<p>Policy <u>Site Allocation Statement SA1613</u>: Land off Lower Eastgate Street</p> <div data-bbox="696 667 1995 884" style="border: 1px solid black; padding: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>
<p>MM52(G)</p>	<p>Site allocations – Minerals Consultation Areas</p>	<p>Policy <u>Site Allocation Statement SA1815</u>: Jordan’s Brook House</p> <div data-bbox="696 1034 1995 1251" style="border: 1px solid black; padding: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>



MM52(H)	Site allocations – Minerals Consultation Areas	<p>Policy <u>Site Allocation Statement SA2017</u>: White City Community Facility</p> <div style="border: 1px solid black; padding: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> </div>						
MM53	Site allocations – Minerals Consultation Areas and land contamination	<p>Policy <u>Site Allocation Statement SA1109</u>: Land rear of St Oswalds Retail Park</p> <div style="border: 1px solid black; padding: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b><u>Land contamination</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within an area subject to historic unlicensed landfill activity. Consequently, an appropriate land contamination risk assessment and options appraisal may be required. Early engagement with the Environment Agency in respect of this matter is strongly encouraged.</u></b></li> </ul> </div>						
MM54(A)	Site allocations – Minerals Consultation Areas and mitigation measures	<p>Policy <u>Site Allocation Statement SA05</u>: Land at Great Western Road Sidings</p> <table border="1" data-bbox="696 1177 1995 1294"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Kingsholm and Wotton / GL1 3PZ / E: 384152 N: 218365</td> </tr> <tr> <td>Gross Site Area:</td> <td>4.3 ha.</td> </tr> <tr> <td>Allocation:</td> <td>Approximately 200 <b>300</b> residential dwellings.</td> </tr> </table> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> </div>	Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3PZ / E: 384152 N: 218365	Gross Site Area:	4.3 ha.	Allocation:	Approximately 200 <b>300</b> residential dwellings.
Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3PZ / E: 384152 N: 218365							
Gross Site Area:	4.3 ha.							
Allocation:	Approximately 200 <b>300</b> residential dwellings.							

		<ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b><u>Mitigation measures</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>
MM54(B)	Site allocations – Minerals Consultation Areas and mitigation measures	<p>Policy <b><u>Site Allocation Statement SA1310</u></b>: Former Colwell Youth &amp; Community Centre</p> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b><u>Mitigation measures</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>
MM54(C)	Site allocations – Minerals Consultation Areas and mitigation measures	<p>Policy <b><u>Site Allocation Statement SA1714</u></b>: Land South of Triangle Park (Southern Railway Triangle)</p> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul>

		<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>						
MM54(D)	Site allocations – Minerals Consultation Areas and mitigation measures	<p>Policy <b><u>Site Allocation Statement SA1916</u></b>: Land off Myers Road</p> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b><u>Mitigation measures</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>						
MM55	Site allocations – SA03 Former Prospect House, 67 – 69 London Road	<p>Policy <b><u>Site Allocation Statement SA03</u></b>: Former Prospect House, 67-69 London Road</p> <table border="1"> <tr> <td>Ward / Postcode / GeoRef</td> <td>Kingsholm and Wotton / GL1 3HF / E: 383906 N: 218911</td> </tr> <tr> <td>Gross Site Area:</td> <td>0.35<u>40</u> ha.</td> </tr> <tr> <td>Allocation:</td> <td>Approximately <del>30</del> <b>60</b> residential dwellings. There is an expectation that the main existing building will be refurbished/repurposed.</td> </tr> </table> <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>• <del>Green roofs/walls should be utilised.</del></li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul>	Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3HF / E: 383906 N: 218911	Gross Site Area:	0.35 <u>40</u> ha.	Allocation:	Approximately <del>30</del> <b>60</b> residential dwellings. There is an expectation that the main existing building will be refurbished/repurposed.
Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3HF / E: 383906 N: 218911							
Gross Site Area:	0.35 <u>40</u> ha.							
Allocation:	Approximately <del>30</del> <b>60</b> residential dwellings. There is an expectation that the main existing building will be refurbished/repurposed.							

		For amendment to site area, please see Policies Map Addendum.						
MM56	Site allocations – SA09 – Former Quayside House, Blackfriars	<p>Policy <b>Site Allocation Statement SA097</b>: Former Quayside House, Blackfriars</p> <div style="border: 1px solid black; padding: 5px;"> <p><u>Flood risk</u></p> <ul style="list-style-type: none"> <li>• A site-specific Flood Risk Assessment is required if any development located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.</li> <li>• Assessment and implementation of Sustainable Drainage Systems (SuDS) in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).</li> <li>• <b><u>Opportunities to improve flood protection along the River Severn as part of a wider regeneration scheme should be explored in consultation with the EA.</u></b></li> </ul> </div>						
MM57	Site allocation SA10 – Former Fleece Hotel and Longsmith Street Car Park	<p>Policy <b>Site Allocation Statement SA1008</b>: Former Fleece Hotel &amp; Longsmith Street Car Park</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Ward / Postcode / GeoRef</td> <td>Westgate / GL1 2TZ (nearest) / E: 383056 N: 218561</td> </tr> <tr> <td>Gross Site Area:</td> <td>1.6 ha</td> </tr> <tr> <td>Allocation:</td> <td><del>Mixed use</del> <b>Main town centre uses</b> including approximately 25 residential units.</td> </tr> </table>	Ward / Postcode / GeoRef	Westgate / GL1 2TZ (nearest) / E: 383056 N: 218561	Gross Site Area:	1.6 ha	Allocation:	<del>Mixed use</del> <b>Main town centre uses</b> including approximately 25 residential units.
Ward / Postcode / GeoRef	Westgate / GL1 2TZ (nearest) / E: 383056 N: 218561							
Gross Site Area:	1.6 ha							
Allocation:	<del>Mixed use</del> <b>Main town centre uses</b> including approximately 25 residential units.							
MM58	Site allocations – SA11 – Land rear of St Oswalds Retail Park	<p>Policy <b>Site Allocation Statement SA1109</b>: Land rear of St Oswalds Retail Park</p> <div style="border: 1px solid black; padding: 5px;"> <p><u>Ground &amp; Surface Water Quality</u></p> <ul style="list-style-type: none"> <li>• <b><u>Development proposals will adopt specific drainage techniques to address the problems of previous contamination and land movement. This is in the interests of protecting ground and surface water quality.</u></b></li> </ul> </div>						

MM59	Site allocations – SA15 – Land south of Winneycroft allocation	<p>Policy <b>Site Allocation Statement SA1512</b>: Land South West of Winneycroft Allocation</p> <div style="border: 1px solid black; padding: 5px;"> <p><b>Flood mitigation</b></p> <ul style="list-style-type: none"> <li>• <b>The site should reasonably contribute to the ongoing Sud &amp; Twyver flood mitigation scheme being led by the City Council in conjunction with the Environment Agency.</b></li> </ul> </div>						
MM60	Site allocations – SA16 – Land off Lower Eastgate Street	<p>Policy <b>Site Allocation Statement SA1613</b>: Land off Lower Eastgate Street</p> <div style="border: 1px solid black; padding: 5px;"> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• <del>Green roofs/walls should be utilised on this site.</del></li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> </div>						
MM61	Site allocations – SA21 – Part of West Quay, The Docks	<p>Policy <b>Site Allocation Statement SA2118</b>: Part of West Quay, the Docks</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Ward / Postcode / GeoRef</td> <td>Westgate / GL2 5HQ / E: 382574 N: 218207</td> </tr> <tr> <td>Gross Site Area:</td> <td>0.7 ha.</td> </tr> <tr> <td>Allocation:</td> <td>Main town centre uses, including approximately 20 dwellings. Please note, the allocation does not include Alexander Warehouse <b>is within the site allocation but is not available as part of the redevelopment scheme.</b></td> </tr> </table>	Ward / Postcode / GeoRef	Westgate / GL2 5HQ / E: 382574 N: 218207	Gross Site Area:	0.7 ha.	Allocation:	Main town centre uses, including approximately 20 dwellings. Please note, the allocation does not include Alexander Warehouse <b>is within the site allocation but is not available as part of the redevelopment scheme.</b>
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Gross Site Area:	0.7 ha.							
Allocation:	Main town centre uses, including approximately 20 dwellings. Please note, the allocation does not include Alexander Warehouse <b>is within the site allocation but is not available as part of the redevelopment scheme.</b>							
Other	Site allocations – SA17 Land South of Triangle	Policy <b>Site Allocation Statement SA1714</b> : Land South of Triangle Park (Southern Railway Triangle)						

	Park (Southern Railway Triangle)	Allocation:	<b><u>Class E (office, research and development, or any other industrial process that can be carried out in a residential area without detriment to amenity only) and/or B1/B8 Class (warehousing and distribution) employment use</u></b>										
MM62(A)	Plan-wide – Relationship with other plans  New paragraph	<b><u>1.6 The other Development Plan Documents for Gloucester City are the Gloucestershire Waste Core Strategy 2012 – 2027, and the Minerals Local Plan for Gloucestershire 2018 – 2032. Forease of use, each policy in the GCP is accompanied with a table that identifies other policies in the Development Plan where there is a direct relationship. A full schedule is provided at Appendix 2.</u></b>											
MM62(B)	Plan-wide – Relationship with other plans  New appendix	<p><b><u>Appendix 2 – Relationship with the Adopted Development Plan</u></b></p> <p><b><u>The following table sets out the relationship between policies in the Gloucester City Plan and the rest of the Development Plan. For ease of use, the relevant section is reproduced for each policy in the Gloucester City Plan.</u></b></p> <table border="1" data-bbox="696 783 2069 1361"> <tr> <td colspan="2" data-bbox="696 783 2069 890"><b><u>The following table sets out how each of the policies in the Gloucester City Plan relate to policies in the adopted Joint Core Strategy.</u></b></td> </tr> <tr> <td data-bbox="696 890 1339 965"><b><u>Gloucester City Plan policy</u></b></td> <td data-bbox="1339 890 2069 965"><b><u>Other Development Plan policy</u></b></td> </tr> <tr> <td colspan="2" data-bbox="696 965 2069 1040"><b><u>A: HOUSING</u></b></td> </tr> <tr> <td data-bbox="696 1040 1339 1220"><b><u>A1: Effective and efficient use of housing land and buildings</u></b></td> <td data-bbox="1339 1040 2069 1220"><b><u>JCS SP2: Distribution of New Development</u></b> <b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b></td> </tr> <tr> <td data-bbox="696 1220 1339 1361"><b><u>A2: Houses in Multiple Occupation</u></b></td> <td data-bbox="1339 1220 2069 1361"><b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b></td> </tr> </table>		<b><u>The following table sets out how each of the policies in the Gloucester City Plan relate to policies in the adopted Joint Core Strategy.</u></b>		<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>	<b><u>A: HOUSING</u></b>		<b><u>A1: Effective and efficient use of housing land and buildings</u></b>	<b><u>JCS SP2: Distribution of New Development</u></b> <b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b>	<b><u>A2: Houses in Multiple Occupation</u></b>	<b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b>
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<b><u>A: HOUSING</u></b>													
<b><u>A1: Effective and efficient use of housing land and buildings</u></b>	<b><u>JCS SP2: Distribution of New Development</u></b> <b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b>												
<b><u>A2: Houses in Multiple Occupation</u></b>	<b><u>JCS SD4: Design Requirements</u></b> <b><u>JCS SD10: Residential Development</u></b> <b><u>JCS SD11: Housing Mix and Standards</u></b> <b><u>JCS SD14: Health and Environmental Quality</u></b>												

	<u><b>A3: Estate regeneration</b></u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u> <u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u>
	<u><b>A4: Student accommodation</b></u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u>
	<u><b>A5: Specialist housing</b></u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD12: Affordable Housing</u>
	<u><b>A6: Accessible and adaptable homes</b></u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>
	<u><b>A7: Self-build and custom build homes</b></u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>
	<u><b>A8: Static caravan sites</b></u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>
	<u><b>A9: Extensions to existing dwellings</b></u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u>
	<u><b>A10: Annexes to existing dwellings</b></u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u>
	<b>B: EMPLOYMENT DEVELOPMENT, CULTURE AND TOURISM</b>	
	<u><b>B1: Employment and skills plans</b></u>	<u>JCS SD1: Employment – Except Retail Development</u>
	<u><b>B2: Safeguarding employment sites and buildings</b></u>	<u>JCS SD1: Employment – Except Retail Development</u>
	<u><b>B3: New employment development and intensification and improvements to existing employment land</b></u>	<u>JCS SD1: Employment – Except Retail Development</u>

	<u>B4: Development within and adjacent to Gloucester Docks and Canal</u>	<u>JCS SD1: Employment – Except Retail Development</u> <u>JCS SD2: Retail and City / Town Centres</u> <u>JCS SD8: Historic Environment</u> <u>JCS SD14: Health and Environmental Quality</u>
	<u>B5: Tourism and culture</u>	<u>JCS SD2: Retail and City / Town Centres</u> <u>JCS INF4: Social and Community Infrastructure</u>
	<u>B6: Protection of public houses</u>	<u>JCS SD2: Retail and City / Town Centres</u> <u>JCS INF4: Social and Community Infrastructure</u>
<b><u>C: HEALTHY COMMUNITIES</u></b>		
	<u>C1: Active design and accessibility</u>	<u>JCS SD4: Design Requirements</u> <u>JCS INF1: Transport Network</u>
	<u>C2: Allotments</u>	<u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u>
	<u>C3: Public open space, playing fields and sports facilities</u>	<u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u>
	<u>C4: Hot food takeaways</u>	<u>JCS SD14: Health and Environmental Quality</u>
	<u>C5: Air quality</u>	<u>JCS SD14: Health and Environmental Quality</u>
	<u>C6: Cordon Sanitaire: Netheridge Sewage Treatment Works</u>	<u>JCS SD14: Health and Environmental Quality</u> <u>Gloucestershire Waste Core Strategy 2012 – 2027: Core Policy WCS11 – Safeguarding Sites for Waste Management</u>
	<u>C7: Fall prevention from taller buildings</u>	<u>JCS SD4: Design Requirements</u>
	<u>C8: Changing Places Toilets</u>	<u>JCS SD4: Design Requirements</u>
<b><u>D: HISTORIC ENVIRONMENT</u></b>		
	<u>D1: Historic environment</u>	<u>JCS SD8: Historic Environment</u>



	<u>D2: Non-designated heritage assets</u>	<u>JCS SD8: Historic Environment</u>
	<u>D3: Recording and advancing understanding of heritage assets</u>	<u>JCS SD8: Historic Environment</u>
	<u>D4: Views of the Cathedral and historic places of worship</u>	<u>JCS SD8: Historic Environment</u>
	<b><u>E: NATURAL ENVIRONMENT</u></b>	
	<u>E1: Biodiversity and geodiversity</u>	<u>JCS SD9: Biodiversity and Geodiversity</u>
	<u>E2: Nature Recovery Area</u>	<u>JCS SD9: Biodiversity and Geodiversity</u>
	<u>E3: Green / blue infrastructure</u>	<u>JCS INF3: Green Infrastructure</u>
	<u>E4: Flooding, sustainable drainage and wastewater</u>	<u>JCS INF2: Flood Risk Management</u>
	<u>E5: Renewable energy potential of the River Severn and the canal</u>	<u>JCS INF5: Renewable Energy/Low Carbon Energy Development</u>
	<u>E6: Development affecting Cotswold Beechwoods Special Area of Conservation</u>	<u>JCS SD9: Biodiversity and Geodiversity</u>
	<u>E7: Trees, woodlands and hedgerows</u>	<u>JCS SD9: Biodiversity and Geodiversity</u> <u>JCS INF3: Green Infrastructure</u>
	<b><u>F: DESIGN</u></b>	
	<u>F1: Materials and finishes</u>	<u>JCS SD4: Design Requirements</u>
	<u>F2: Landscape and planting</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD6: Landscape</u> <u>JCS INF3: Green Infrastructure</u>
	<u>F3: Community safety</u>	<u>JCS SD4: Design Requirements</u>

	<u>F4: Gulls</u>	<u>JCS SD14: Health and Environmental Quality</u>
	<u>F5: Open plan estates</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD9: Biodiversity and Geodiversity</u>
	<u>F6: Nationally Described Space Standards</u>	<u>JCS SD11: Housing Mix and Standards</u>
	<u>F7: Shopfronts, shutters and signs</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD8: Historic Environment</u>
<b><u>G: SUSTAINABLE LIVING, TRANSPORT AND INFRASTRUCTURE</u></b>		
	<u>G1: Sustainable transport</u>	<u>JCS SD4: Design Requirements</u> <u>JCS INF1: Transport Network</u> <u>JCS INF6: Infrastructure Delivery</u>
	<u>G2: Charging infrastructure for electric vehicles</u>	<u>JCS SD3: Sustainable Design and Construction</u> <u>JCS SD4: Design Requirements</u> <u>JCS INF6: Infrastructure Delivery</u>
	<u>G3: Cycling</u>	<u>JCS INF1: Transport Network</u> <u>JCS INF6: Infrastructure Delivery</u>
	<u>G4: Walking</u>	<u>JCS INF1: Transport Network</u> <u>JCS INF6: Infrastructure Delivery</u>
	<u>G5: Broadband connectivity</u>	<u>JCS INF6: Infrastructure Delivery</u>
	<u>G6: Telecommunications infrastructure</u>	<u>JCS INF6: Infrastructure Delivery</u>
	<u>G7: Water Efficiency</u>	<u>JCS SD3: Sustainable Design and Construction</u> <u>JCS INF6: Infrastructure Delivery</u>
	<u>G8: Review mechanism</u>	/
<b><u>SITE ALLOCATIONS</u></b>		
	<u>Site Allocations</u>	<u>JCS SP1: The Need for New Development</u> <u>JCS SP2: Distribution of New Development</u>

		<p><b><u>JCS SD1: Employment – except retail development</u></b>  <b><u>JCS SD10: Residential Development</u></b>  <b><u>JCS SD13: Gypsies, Travellers and Travelling Showpeople</u></b>  <b><u>Minerals Local Plan for Gloucestershire 2018 – 2032: Core Policy MS01 – Non-Mineral Development within Mineral Safeguarding Areas</u></b></p>															
MM65	<p>Monitoring Framework</p> <p>Paragraph 5.1</p>	<p><b>5.6. MONITORING FRAMEWORK</b></p> <p><b>5.1 6.1</b> The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a monitoring framework, which are directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required in easily available and reliable.</p> <p>A: Housing</p> <table border="1" data-bbox="696 783 1895 1329"> <thead> <tr> <th>JCS INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> </thead> <tbody> <tr> <td><b><u>Net dwelling completions, based on the set housing requirements and 5-year housing supply.</u></b></td> <td><b><u>Annual housing monitoring</u></b></td> <td><b><u>Annual</u></b></td> </tr> <tr> <td><b><u>Net completions of Gypsy, Traveller and Travelling Showpeople accommodation, against requirements, based on the set target.</u></b></td> <td><b><u>Annual housing monitoring</u></b></td> <td><b><u>Annual</u></b></td> </tr> <tr> <th>CITY PLAN INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> <tr> <td><b><u>Net specialist housing units completed, supported by specialist housing commissioner</u></b></td> <td><b><u>Housing monitoring / internal</u></b></td> <td><b><u>Annual</u></b></td> </tr> </tbody> </table>	JCS INDICATOR	SOURCE	FREQUENCY	<b><u>Net dwelling completions, based on the set housing requirements and 5-year housing supply.</u></b>	<b><u>Annual housing monitoring</u></b>	<b><u>Annual</u></b>	<b><u>Net completions of Gypsy, Traveller and Travelling Showpeople accommodation, against requirements, based on the set target.</u></b>	<b><u>Annual housing monitoring</u></b>	<b><u>Annual</u></b>	CITY PLAN INDICATOR	SOURCE	FREQUENCY	<b><u>Net specialist housing units completed, supported by specialist housing commissioner</u></b>	<b><u>Housing monitoring / internal</u></b>	<b><u>Annual</u></b>
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## B: Employment development, culture and tourism

CITY PLAN INDICATOR	SOURCE	FREQUENCY
<b><u>Employment land allocations delivered.</u></b>	<b><u>Employment monitoring / Internal</u></b>	<b><u>Annual</u></b>
<b><u>Number of major developments with an agreed Employment and Skills Plan.</u></b>	<b><u>Employment monitoring / internal</u></b>	<b><u>Annual</u></b>

## C: Healthy communities

CITY PLAN INDICATOR	SOURCE	FREQUENCY
<b><u>Hot food takeaways granted planning permission within 400m of a secondary school or college access point.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>

## E: Natural Environment

CITY PLAN INDICATOR	SOURCE	FREQUENCY
<b><u>Number of developments permitted that do not achieve biodiversity net gain (on site or off site)</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual (interim)</u></b>
<b><u>Net gain in biodiversity units</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>

## F: Design

CITY PLAN INDICATOR	SOURCE	FREQUENCY
<b><u>Number of new homes permitted that fall below</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>

		<p><b><u>Nationally Described Space Standards</u></b></p> <p>G: Sustainable living, transport and infrastructure</p> <table border="1" data-bbox="696 376 1895 743"> <thead> <tr> <th>CITY PLAN INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> </thead> <tbody> <tr> <td><b><u>Number of dwellings permitted without secure cycle parking.</u></b></td> <td><b><u>Annual monitoring report / internal</u></b></td> <td><b><u>Annual</u></b></td> </tr> <tr> <td><b><u>Number of dwellings permitted without car charging infrastructure.</u></b></td> <td><b><u>Annual monitoring report / internal</u></b></td> <td><b><u>Annual</u></b></td> </tr> <tr> <td><b><u>Number of dwellings permitted without full-fibre broadband connectivity.</u></b></td> <td><b><u>Annual monitoring report / internal</u></b></td> <td><b><u>Annual</u></b></td> </tr> </tbody> </table>	CITY PLAN INDICATOR	SOURCE	FREQUENCY	<b><u>Number of dwellings permitted without secure cycle parking.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>	<b><u>Number of dwellings permitted without car charging infrastructure.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>	<b><u>Number of dwellings permitted without full-fibre broadband connectivity.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>
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<b><u>Number of dwellings permitted without full-fibre broadband connectivity.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>												
MM66	Superseded policies  Paragraph 7.1	<p><del>7</del><b>8.SUPERSEDED POLICIES</b></p> <p><b>7.1 8.1</b> The following policies from the Adopted Gloucester City Local Plan (1983) are superseded by the Gloucester City Plan. <b><u>The list below shows the policies of the adopted Gloucester Local Plan 1983 (saved in 2007) which will be superseded on adoption of the Gloucester City Plan (in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulation 2021). With the exception of retail policies, all remaining policies of the 1983 Gloucester Local Plan have been superseded by the adopted Joint Core Strategy and Gloucester City Plan. These are as follows:</u></b></p> <table border="1" data-bbox="696 1106 1895 1394"> <tbody> <tr> <td>E1</td> <td>Release of industrial land sufficient for 5 years requirement</td> </tr> <tr> <td>E2</td> <td>Release of office development sufficient to cater for 5 years requirement</td> </tr> <tr> <td>H1</td> <td>Release of land for residential development to cater for 5 years requirement</td> </tr> <tr> <td>H1c</td> <td>Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</td> </tr> </tbody> </table>	E1	Release of industrial land sufficient for 5 years requirement	E2	Release of office development sufficient to cater for 5 years requirement	H1	Release of land for residential development to cater for 5 years requirement	H1c	Provision of additional housing sites to those identified in H1a will be encouraged in the city centre				
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H1c	Provision of additional housing sites to those identified in H1a will be encouraged in the city centre													

		H1e	Density and quality of housing development
		H3	Preservation and revitalization of older housing stock
		H4b	Provision of grants for adaptation of homes for the registered disabled
		A1a	Heights of buildings and protection of views
		A2	Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas
		A2d	Demolition of listed buildings in conservation areas
		A3g	Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street
		A4e	Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances
		A5a	The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged
		A5c	Conservation and maintenance of structures and settings of City's historic fabric (various sites)
		A5d	Redevelopment of Blackfriars as a tourist attraction
		A6a	Provision of coach parking facilities at Westgate Street and the Docks
		A7	Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand
		A7a	Provision of appropriate self-catering accommodation. Conference Centre and central area hotels
		A7b	Encourage Guest House developments along main radial routes and the city centre
		T1e	Pedestrian priority within traffic management schemes in the main shopping area of the city.

		T1f	Pedestrian priority in the city centre outside the main shopping area
		T2d	Measures to facilitate rear access servicing
		T3	Introduction of traffic regulation and control measures along Bristol Road and Southgate Street
		T3a	Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures
		T3b	Consideration will be given to traffic management along Bristol Road
		T4a	Differential charging of short and long stay car parks to discourage inappropriate use
		T4k	Provision of car parking at private development in accordance with the Councils car parking standards
		S1e	Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area
		S2b	Major convenience shopping will not usually be permitted outside the main shopping area
		S3	Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged
		S3a	Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas
		S3b	The City Council will seek to maintain the existing neighbourhood shopping provision in the City
		L1	Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.
		L1a	Retain existing areas of public open space
		L1c	In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.

		L1d	Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.		
		L2d	Seek to provide additional sports facilities on public open space in new developments.		
		L3c	Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester		
		L3d	Maintenance and protection of Robinswood Hill Country Park		
		<b><u>Local Plan policy</u></b>			
				<b><u>Superseded by Gloucester City Plan</u></b>	
				<b><u>Superseding Gloucester City Plan policy</u></b>	
		<b><u>E1</u></b>	<b><u>Release of industrial land sufficient for 5 years requirement</u></b>	<b><u>Yes</u></b>	
		<b><u>E2</u></b>	<b><u>Release of office development sufficient to cater for 5 years requirement</u></b>	<b><u>Yes</u></b>	
		<b><u>H1</u></b>	<b><u>Release of land for residential development to cater for 5 years requirement</u></b>	<b><u>Yes</u></b>	
		<b><u>H1c</u></b>	<b><u>Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</u></b>	<b><u>Yes</u></b>	
		<b><u>H1e</u></b>	<b><u>Density and quality of housing development</u></b>	<b><u>Yes</u></b>	
		<b><u>H3</u></b>	<b><u>Preservation and revitalization of older housing stock</u></b>	<b><u>Yes</u></b>	
		<b><u>H4b</u></b>	<b><u>Provision of grants for adaptation of homes for the registered disabled</u></b>	<b><u>No – no longer applicable</u></b>	
				<b><u>B3/SA</u></b>	
				<b><u>B3/SA</u></b>	
				<b><u>SA</u></b>	
				<b><u>A1</u></b>	
				<b><u>A1, F1, F6</u></b>	
				<b><u>A3</u></b>	
				<b><u>-</u></b>	



		<b><u>A1a</u></b>	<b><u>Heights of buildings and protection of views</u></b>	<b><u>Yes</u></b>	<b><u>D4</u></b>
		<b><u>A2</u></b>	<b><u>Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas</u></b>	<b><u>Yes</u></b>	<b><u>D1, D3</u></b>
		<b><u>A2d</u></b>	<b><u>Demolition of listed buildings in conservation areas</u></b>	<b><u>Yes</u></b>	<b><u>D1</u></b>
		<b><u>A3g</u></b>	<b><u>Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
		<b><u>A4e</u></b>	<b><u>Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances</u></b>		
		<b><u>A5a</u></b>	<b><u>The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged</u></b>	<b><u>Yes</u></b>	<b><u>B5</u></b>
		<b><u>A5c</u></b>	<b><u>Conservation and maintenance of structures and settings of City's historic fabric (various sites)</u></b>	<b><u>Yes</u></b>	<b><u>D1, D2</u></b>
		<b><u>A5d</u></b>	<b><u>Redevelopment of Blackfriars as a tourist attraction</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>-</u></b>
		<b><u>A6a</u></b>	<b><u>Provision of coach parking facilitate at Westgate Street and the Docks</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>-</u></b>
		<b><u>A7</u></b>	<b><u>Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand</u></b>	<b><u>Yes</u></b>	<b><u>B5</u></b>
		<b><u>A7a</u></b>	<b><u>Provision of appropriate self-catering accommodation. Conference Centre and central area hotels</u></b>	<b><u>Yes</u></b>	<b><u>B5</u></b>
		<b><u>A7b</u></b>	<b><u>Encourage Guest House developments along main radial routes and the city centre</u></b>	<b><u>Yes</u></b>	<b><u>B5</u></b>

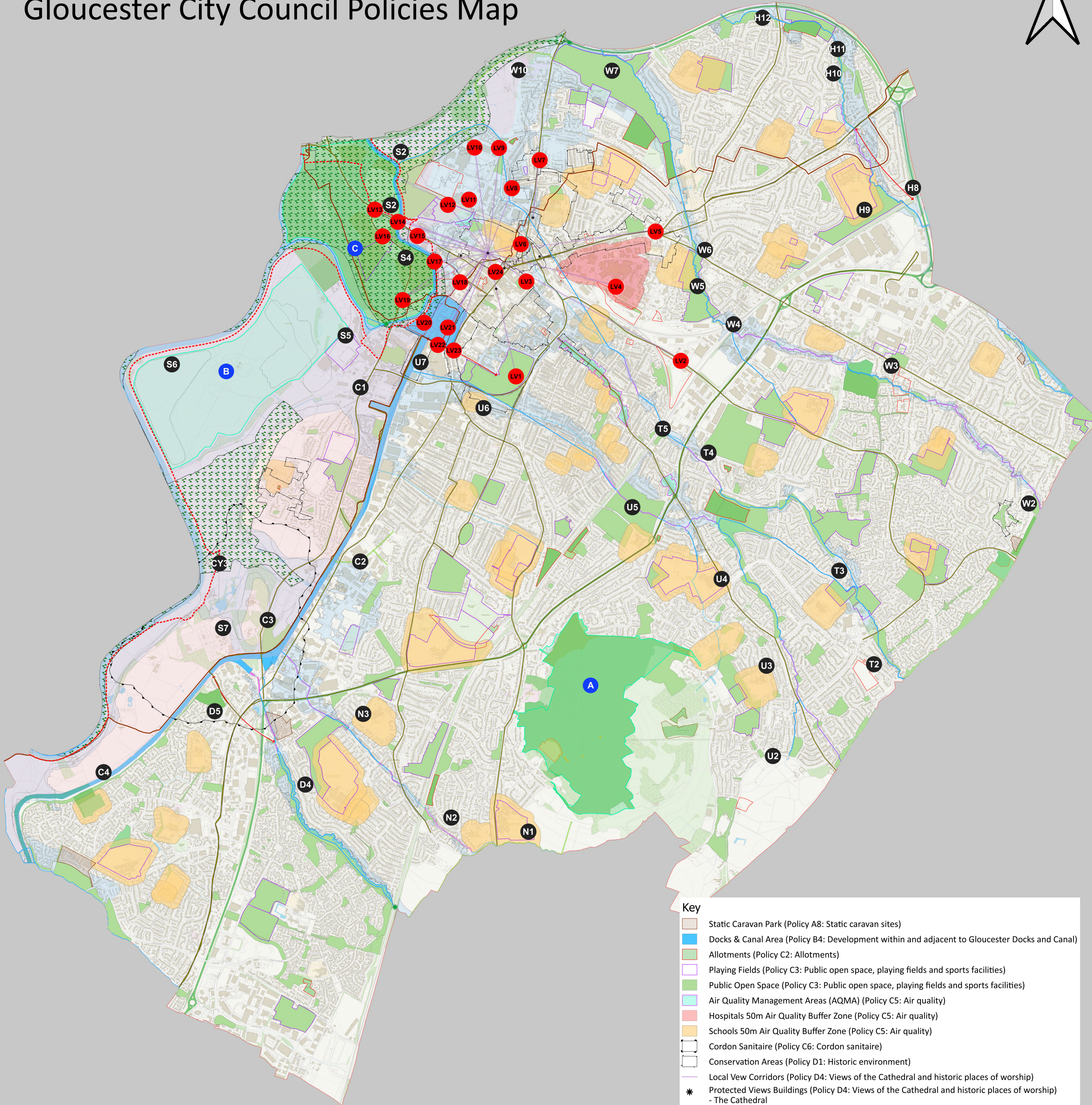
		<b><u>T1e</u></b>	<b><u>Pedestrian priority within traffic management schemes in the main shopping area of the city.</u></b>	<b><u>Yes</u></b>	<b><u>G1</u></b>
		<b><u>T1f</u></b>	<b><u>Pedestrian priority in the city centre outside the main shopping area</u></b>	<b><u>Yes</u></b>	<b><u>G1</u></b>
		<b><u>T2d</u></b>	<b><u>Measures to facilitate rear access servicing</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>=</u></b>
		<b><u>T3</u></b>	<b><u>Introduction of traffic regulation and control measures along Bristol Road and Southgate Street</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>=</u></b>
		<b><u>T3a</u></b>	<b><u>Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>=</u></b>
		<b><u>T3b</u></b>	<b><u>Consideration will be given to traffic management along Bristol Road</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>=</u></b>
		<b><u>T4a</u></b>	<b><u>Differential charging of short and long stay car parks to discourage inappropriate use</u></b>	<b><u>No – no longer relevant</u></b>	<b><u>=</u></b>
		<b><u>T4k</u></b>	<b><u>Provision of car parking at private development in accordance with the Councils car parking standards</u></b>	<b><u>Yes</u></b>	<b><u>G1, G2</u></b>
		<b><u>S1e</u></b>	<b><u>Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area</u></b>	<b><u>No</u></b>	
		<b><u>S2b</u></b>	<b><u>Major convenience shopping will not usually be permitted outside the main shopping area</u></b>	<b><u>No</u></b>	
		<b><u>S3</u></b>	<b><u>Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged</u></b>	<b><u>No</u></b>	

		<b>S3a</b>	<b><u>Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas</u></b>	<b><u>No</u></b>	
		<b>S3b</b>	<b><u>The City Council will seek to maintain the existing neighbourhood shopping provision in the City</u></b>	<b><u>No</u></b>	
		<b>L1</b>	<b><u>Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L1a</b>	<b><u>Retain existing areas of public open space</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L1c</b>	<b><u>In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L1d</b>	<b><u>Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L2d</b>	<b><u>Seek to provide additional sports facilities on public open space in new developments.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L3c</b>	<b><u>Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
		<b>L3d</b>	<b><u>Maintenance and protection of Robinswood Hill Country Park</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
		<b>L5.b</b>	<b><u>Replacement provision of allotments</u></b>	<b><u>Yes</u></b>	<b><u>C2</u></b>
		<b>L6</b>	<b><u>Maintenance of public footpath network</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>

		<b><u>L6.a</u></b>	<b><u>Development of land crossed by a public right of way</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	
		<b><u>L7.a</u></b>	<b><u>Presumption against development likely to affect the Robinswood Hill Quarry Site</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	
		<b><u>L7.b</u></b>	<b><u>Nature conservation will be taken into account in proposals for development on a number of sites</u></b>	<b><u>Yes</u></b>	<b><u>E1, E2</u></b>	
		<b><u>C1.a</u></b>	<b><u>Site reserved at Abbeydale for location of an NHS clinic</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	
		<b><u>C1.e</u></b>	<b><u>Site identified at Abbeydale to provide two Primary Schools</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	
		<b><u>C1.f</u></b>	<b><u>Site identified at Abbeydale for County Council to provide a new library</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	
		<b><u>C1.g</u></b>	<b><u>Site identified at Abbeydale for Gloucestershire Constabulary to provide police station</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>=</u></b>	



# Gloucester City Council Policies Map



- Key**
- Static Caravan Park (Policy A8: Static caravan sites)
  - Docks & Canal Area (Policy B4: Development within and adjacent to Gloucester Docks and Canal)
  - Allotments (Policy C2: Allotments)
  - Playing Fields (Policy C3: Public open space, playing fields and sports facilities)
  - Public Open Space (Policy C3: Public open space, playing fields and sports facilities)
  - Air Quality Management Areas (AQMA) (Policy C5: Air quality)
  - Hospitals 50m Air Quality Buffer Zone (Policy C5: Air quality)
  - Schools 50m Air Quality Buffer Zone (Policy C5: Air quality)
  - Cordon Sanitaire (Policy C6: Cordon sanitaire)
  - Conservation Areas (Policy D1: Historic environment)
  - Local View Corridors (Policy D4: Views of the Cathedral and historic places of worship)
  - Protected Views Buildings (Policy D4: Views of the Cathedral and historic places of worship)
    - The Cathedral
    - St John's
    - St Mark's
    - St Michaels Tower
    - St Nicholas
    - St Peter's
  - Local Nature Reserves (Policy E1: Biodiversity and geodiversity)
  - Local Wildlife Sites (Policy E1: Biodiversity and geodiversity)
  - RIGS (Policy E1: Biodiversity and geodiversity)
  - Sites of Special Scientific Interest (SSSI) (Policy E1: Biodiversity and geodiversity)
  - Nature Recovery Area (Policy E2: Nature Recovery Area)
  - Culverted Watercourses (Policy E3: Green/Blue Infrastructure)
  - Existing Green Bridges (Policy E3: Green/Blue Infrastructure)
  - Existing Green Corridor (Policy E3: Green/Blue Infrastructure)
  - Long Distance Footpath (Policy E3: Green/Blue Infrastructure)
  - Open Watercourse – Wildlife Corridor (Policy E3: Green/Blue Infrastructure)
  - Potential Pedestrian/Cycle Bridge (Policy E3: Green/Blue Infrastructure)
  - Priority Green Infrastructure Opportunities in Gloucester (Policy E3: Green/Blue Infrastructure)
  - Proposed Green Corridor (Policy E3: Green/Blue Infrastructure)
  - Proposed Pedestrian Link (Policy E3: Green/Blue Infrastructure)
  - Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
  - Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
  - Sub Regional Green Infrastructure Potential Regional Park (Policy E3: Green/Blue Infrastructure)
  - Watercourse (Policy E3: Green/Blue Infrastructure)
  - Floodzone Level 2 (Policy E4: Flooding, sustainable drainage and waste water)
  - Ancient Woodland (Policy E7: Trees, woodland and hedgerows)
  - Cycle Network (Policy G3: Cycling)
  - National Cycle Route (Policy G3: Cycling)
  - Site Allocations (Policy SA)





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## **City Plan Policy Map Addendums (April 2022)**

### **Area of High Landscape Sensitivity**

1. Area of High Medium and High Landscape Sensitivity - nr Robinswood – Deleted
2. Area of High Medium Landscape Sensitivity - East of Hempsted – Deleted

### **City Centre Boundary**

3. City Centre Boundary – Deleted

### **Deleted / Amended Site Allocations**

4. 67-69 London Rd - Amended
5. Kings Quarter – Deleted
6. Land at Rea Lane – Deleted
7. Land at Secunda Way – Deleted
8. Lynton Fields – Deleted

### **District Centres**

9. Abbeydale District Centre – Deleted
10. Quedgeley District Centre – Deleted

### **Gloucester Cycle Network**

11. Gloucester Cycle Network – Amended

### **Local Centres**

12. Barton Street Local Centre – Deleted
13. Cheltenham Road Local Centre – Deleted
14. Coney Hill Parade Local Centre – Deleted
15. Finlay Road Local Centre – Deleted
16. Holmleigh Parade Local Centre – Deleted
17. Hucclecote, Silverdale & Glenville Parade Local Centre – Deleted
18. Kingsway Local Centre – Deleted
19. Matson Avenue Local Centre – Deleted
20. Mead Road Local Centre – Deleted
21. Seventh Avenue Local Centre – Deleted
22. Seymour Road 1 Local Centre – Deleted

- 23. Seymour Road 2 Local Centre – Deleted
- 24. Tredworth High Street Local Centre – Deleted
- 25. Windsor Drive Local Centre – Deleted

**Local Nature Reserves**

- 26. Local Nature Reserves – Added

**Local View Corridors**

- 27. Local View Corridors – Added

**Local Wildlife Sites**

- 28. LWS Alney Island – Added
- 29. LWS Barnwood Arboretum & Park – Added
- 30. LWS Gloucester & Sharpness Canal & The Causeway – Added
- 31. LWS Green Farm Orchard – Added
- 32. LWS Hucclecote Meadows – Added
- 33. LWS Matson Wood – Added
- 34. LWS Osier Pond & Beds 1 – Added
- 35. LWS Osier Pond & Beds 2 – Added
- 36. LWS Osier Pond & Beds 3 – Added
- 37. LWS Robinswood Hill – Added
- 38. LWS Sandhurst Lane Meadows – Added
- 39. LWS Sud Meadow - Added – Added
- 40. LWS Walham Ponds - Very small section in Gloucester – Added

**Primary & Secondary Shop Frontages**

- 41. Primary and Secondary Shop Frontages – Deleted

**Primary Shopping Area**

- 42. Primary Shopping Area – Deleted

**Protected Views Buildings**

- 43. Protected Views Buildings – Amended

**Regionally Important Geological Sites RIGS**

- 44. RIGS – Added

**Robinswood Hill Country Park**

- 45. Robinswood Hill Country Park – Deleted



**Southgate Street THI**

46. Southgate Street THI – Deleted

**Travelling Show People's Sites**

47. Travelling Show People's Sites – Deleted

**Winneycroft Strategic Allocation**

48. Winneycroft Strategic Allocation – Deleted

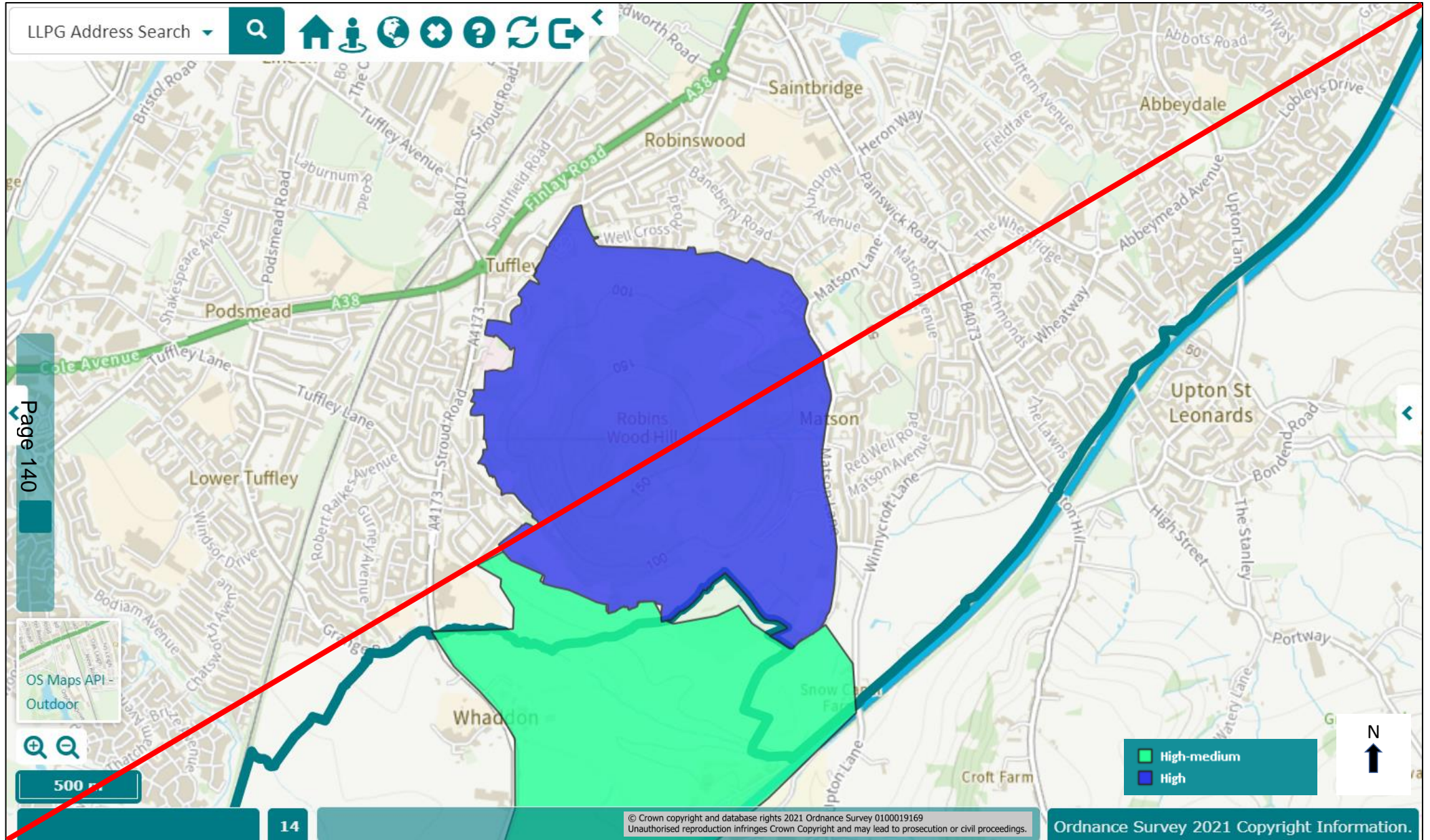
**Green/Blue Infrastructure**

49. Green Blue Infrastructure Explanation

50. Green Blue Infrastructure Additions

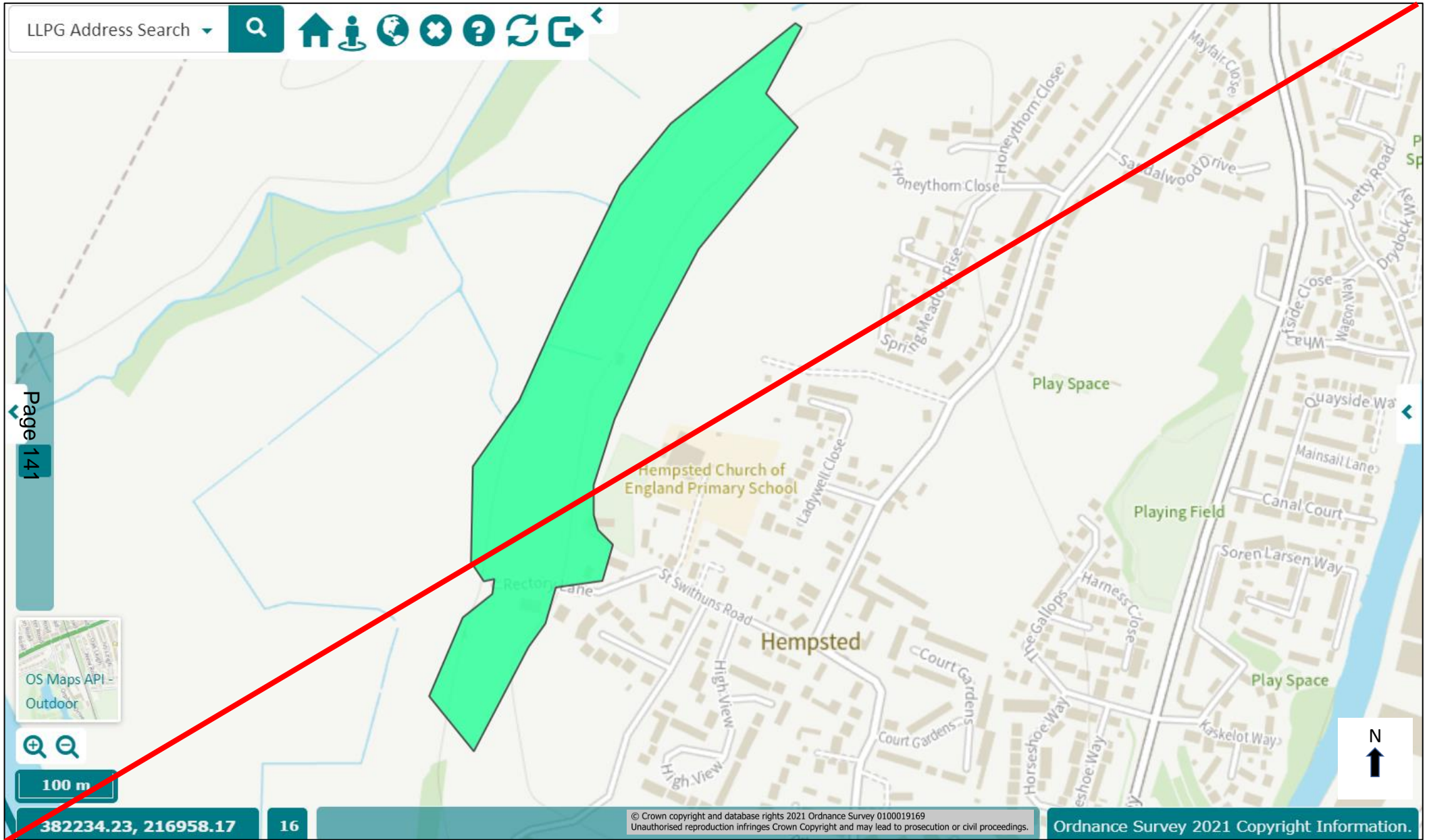
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Area of High Medium and High Landscape Sensitivity – Robinswood. Deleted. In JCS.

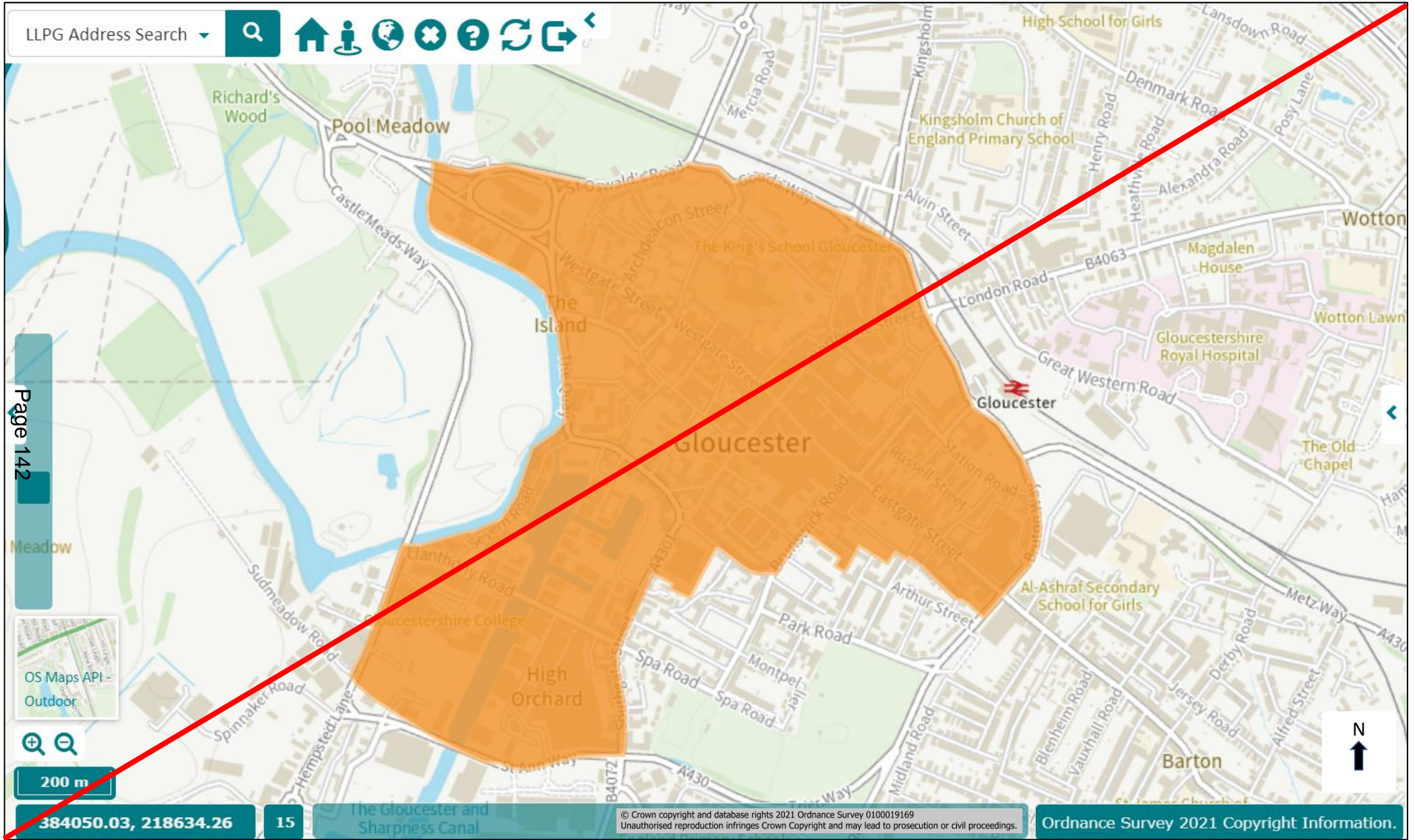




Area of High/Medium Landscape Sensitivity – East of Hempsted. Deleted. In JCS.



City Centre Boundary: Deleted. Covered by JCS.





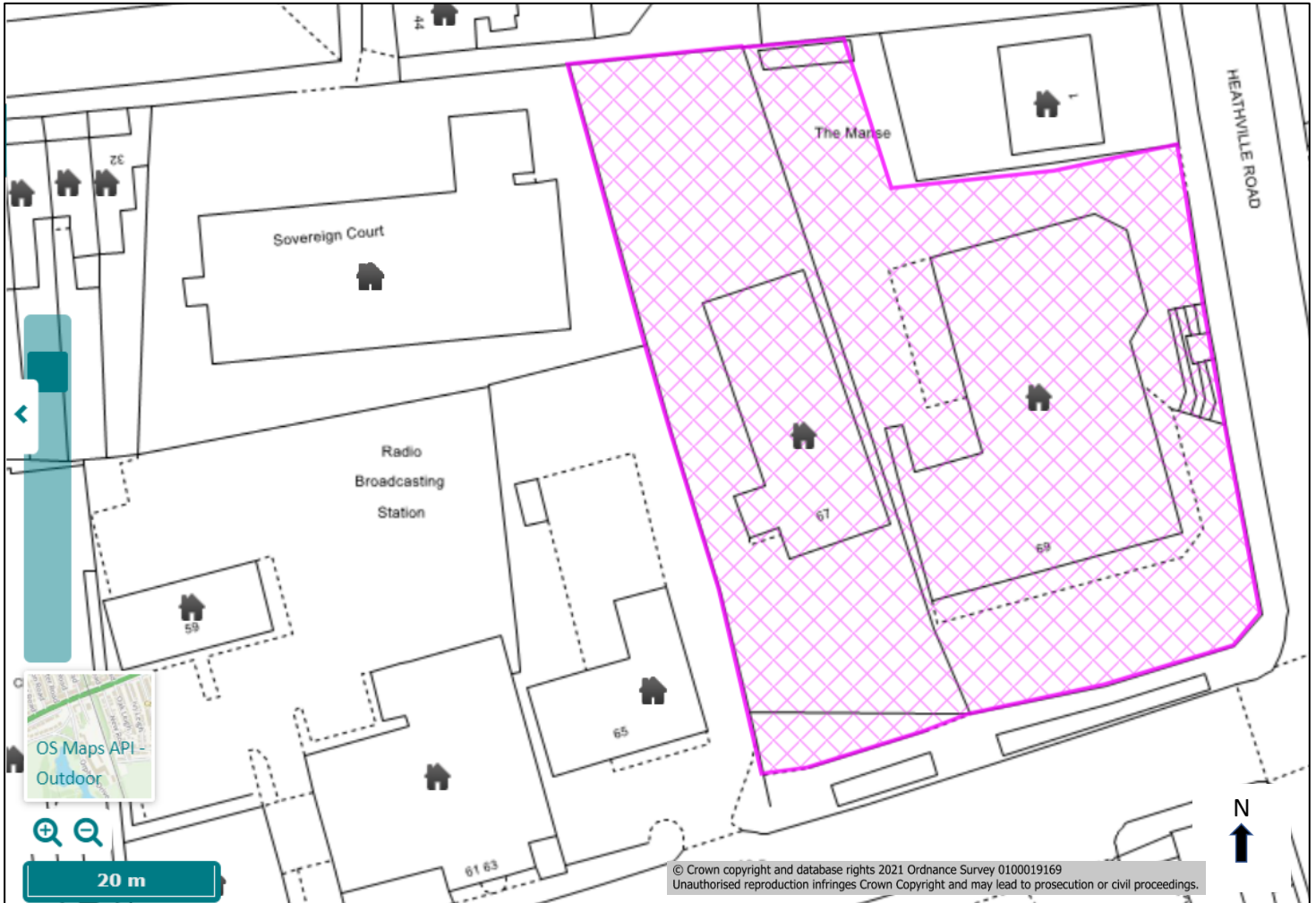
Below: Extent of SA03 67-69 London Road Allocation – as per Submission Version of Policies Map



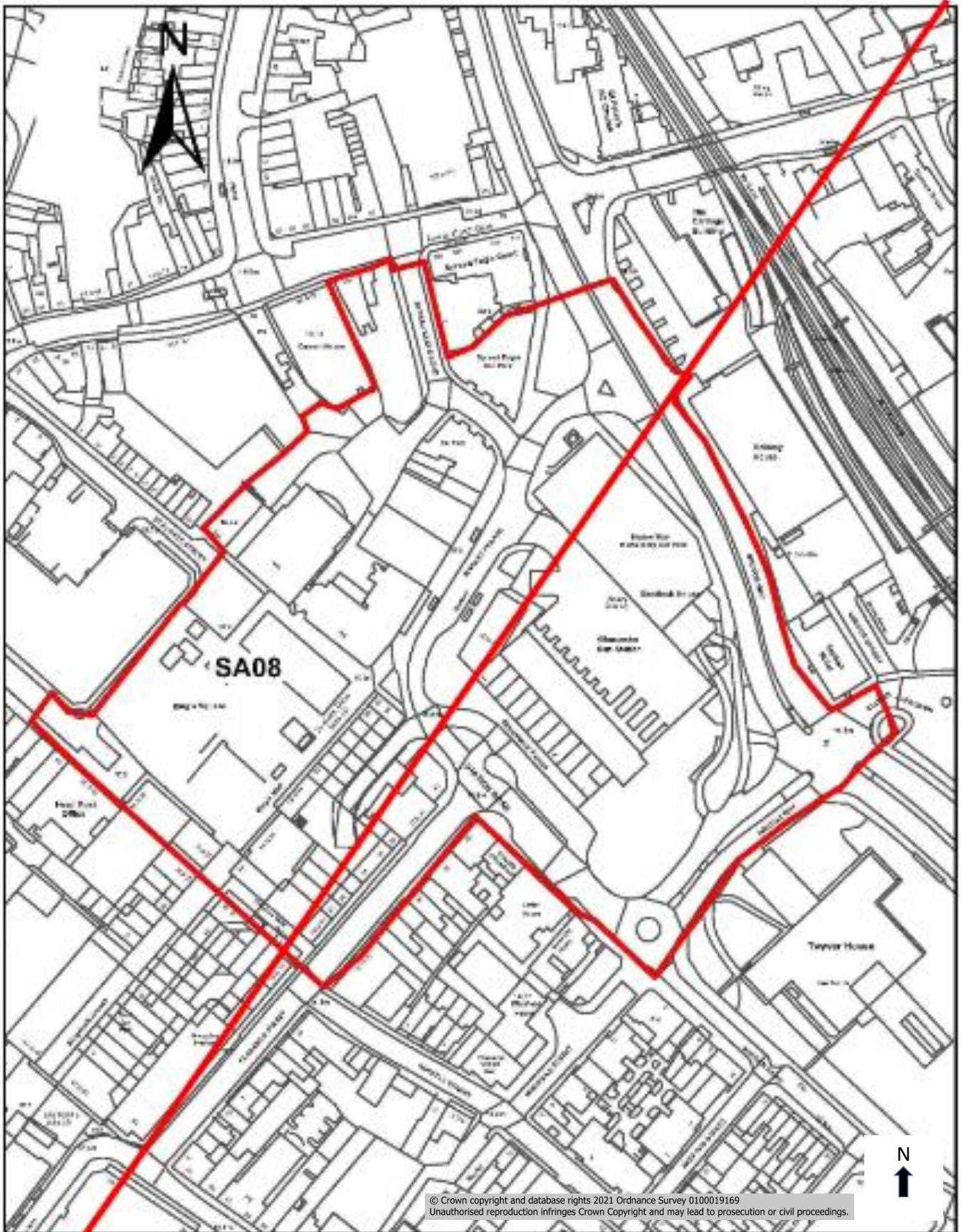
### Former Prospect House, 67-69 London Road

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Below: SA03 67-69 London Road Allocation – Proposed Modification – showing a small area at the rear of Number 1 Heathville Road added to the allocation



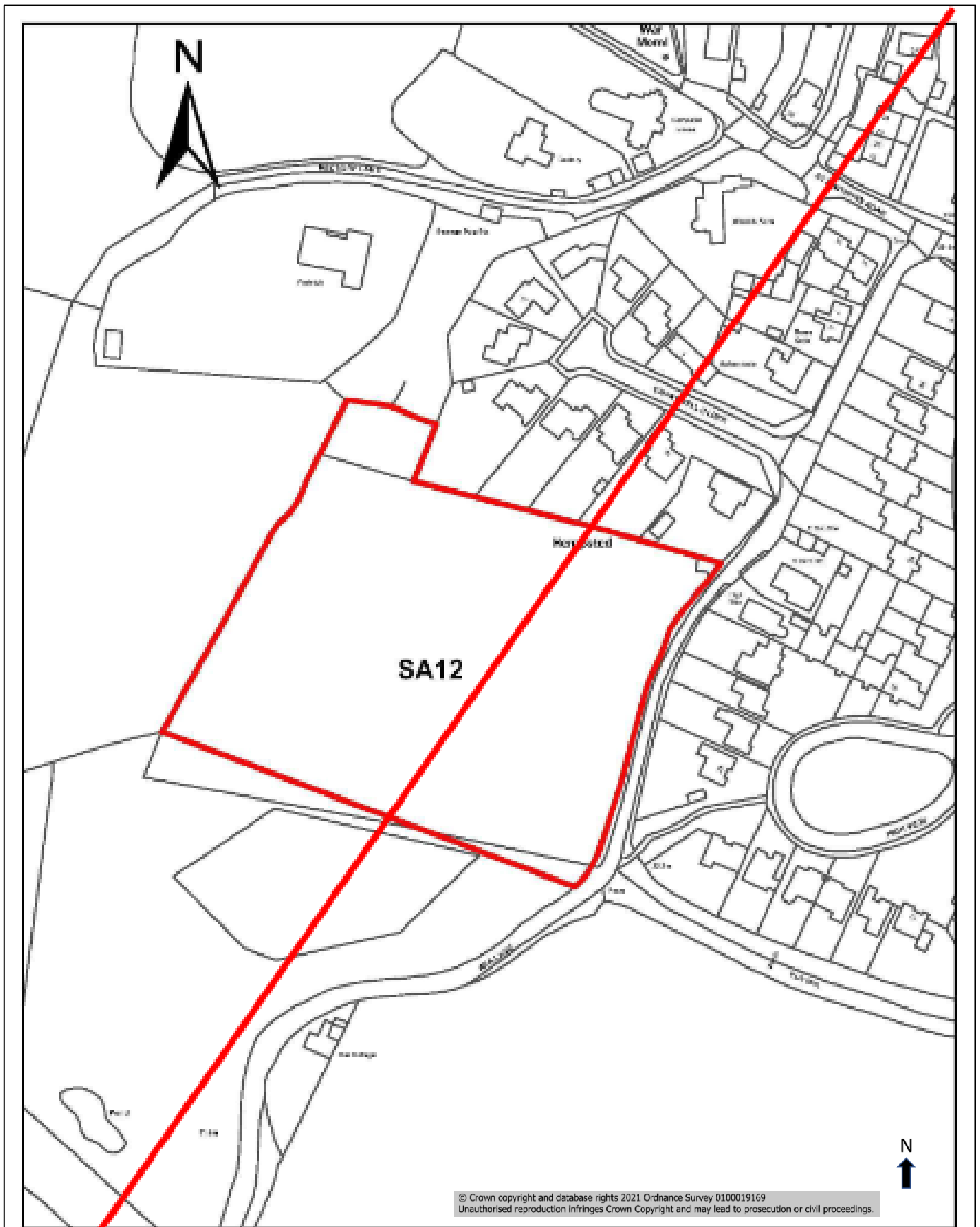




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## Kings Quarter

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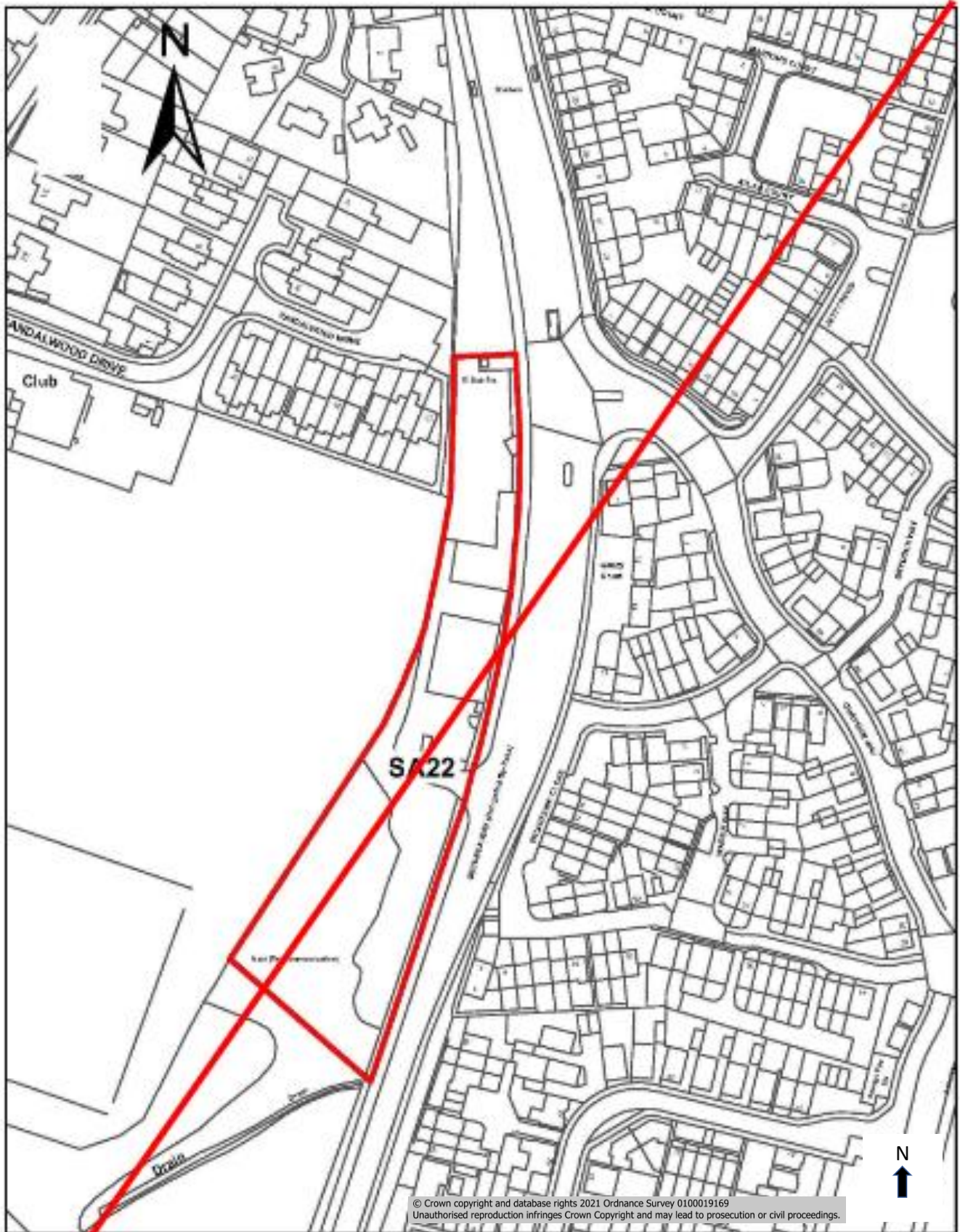


## Land at Rea lane

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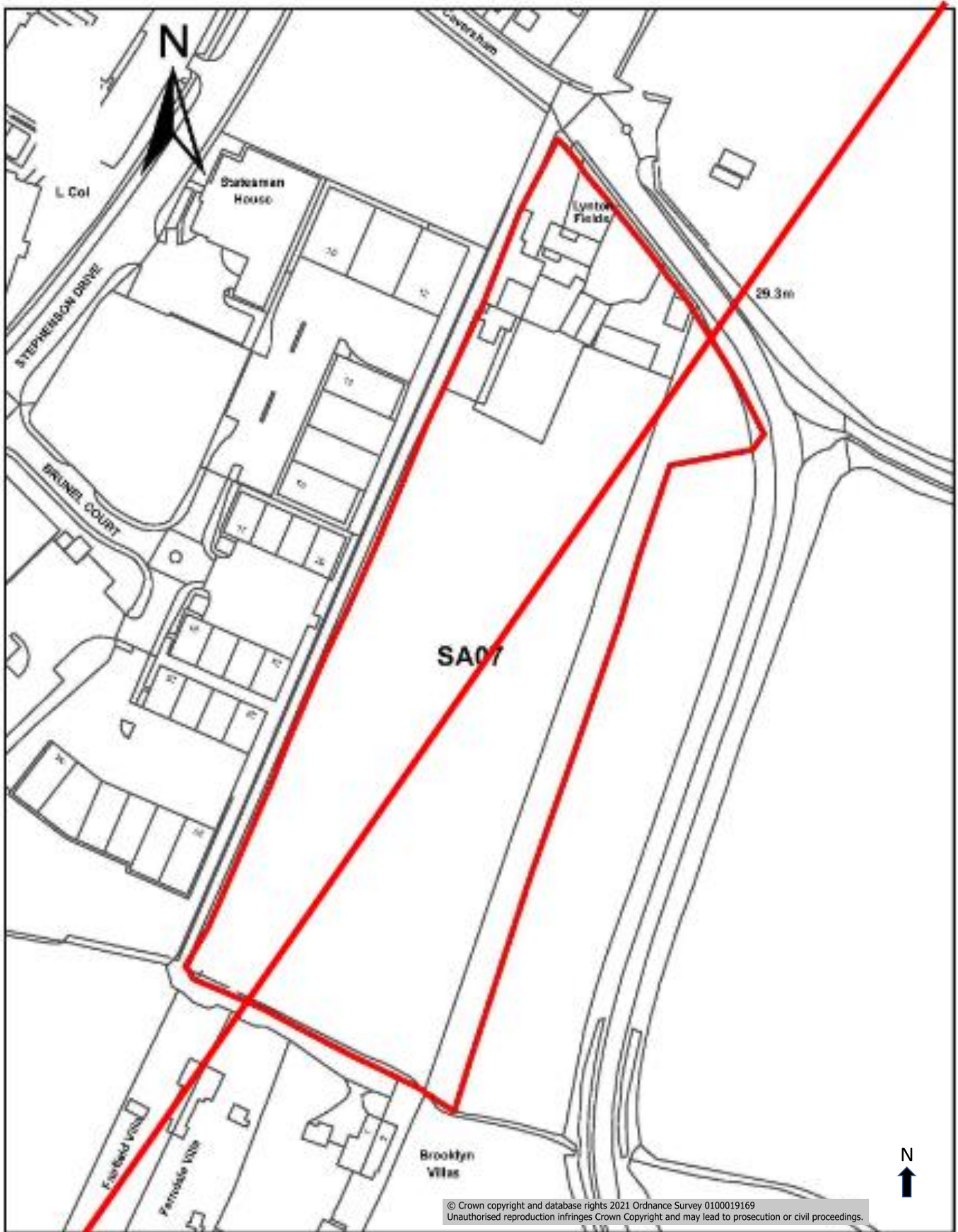


SA22 Land adjacent to Secunda Way Industrial Estate. Deleted. Permission granted for other use.



### Land adjacent to Secunda Way Industrial Estate

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

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Abbeyle District Centre. Deleted. No Policy Reference in GCP.

LLPG Address Search

Page 149

OS Maps API - Outdoor

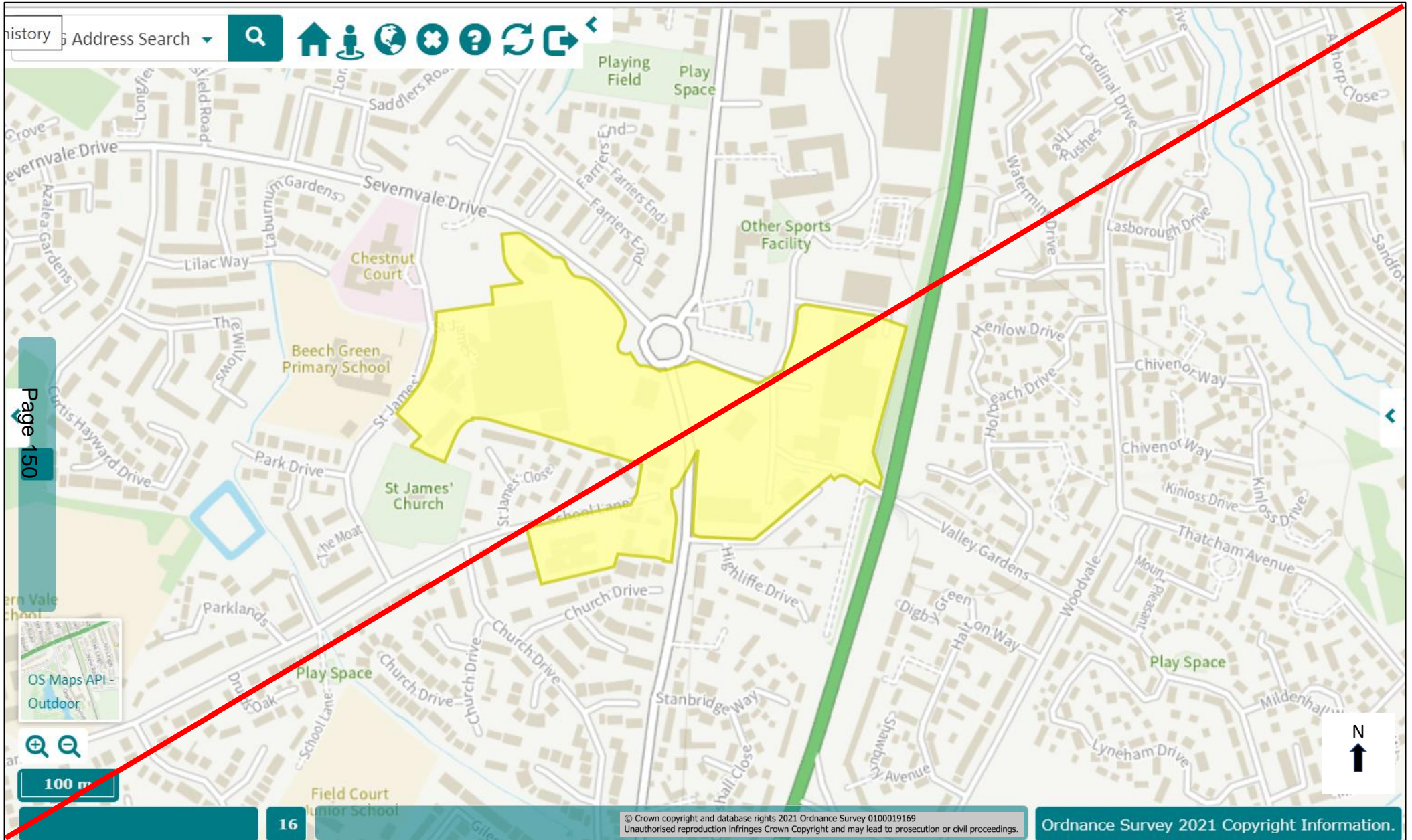
50 m

17

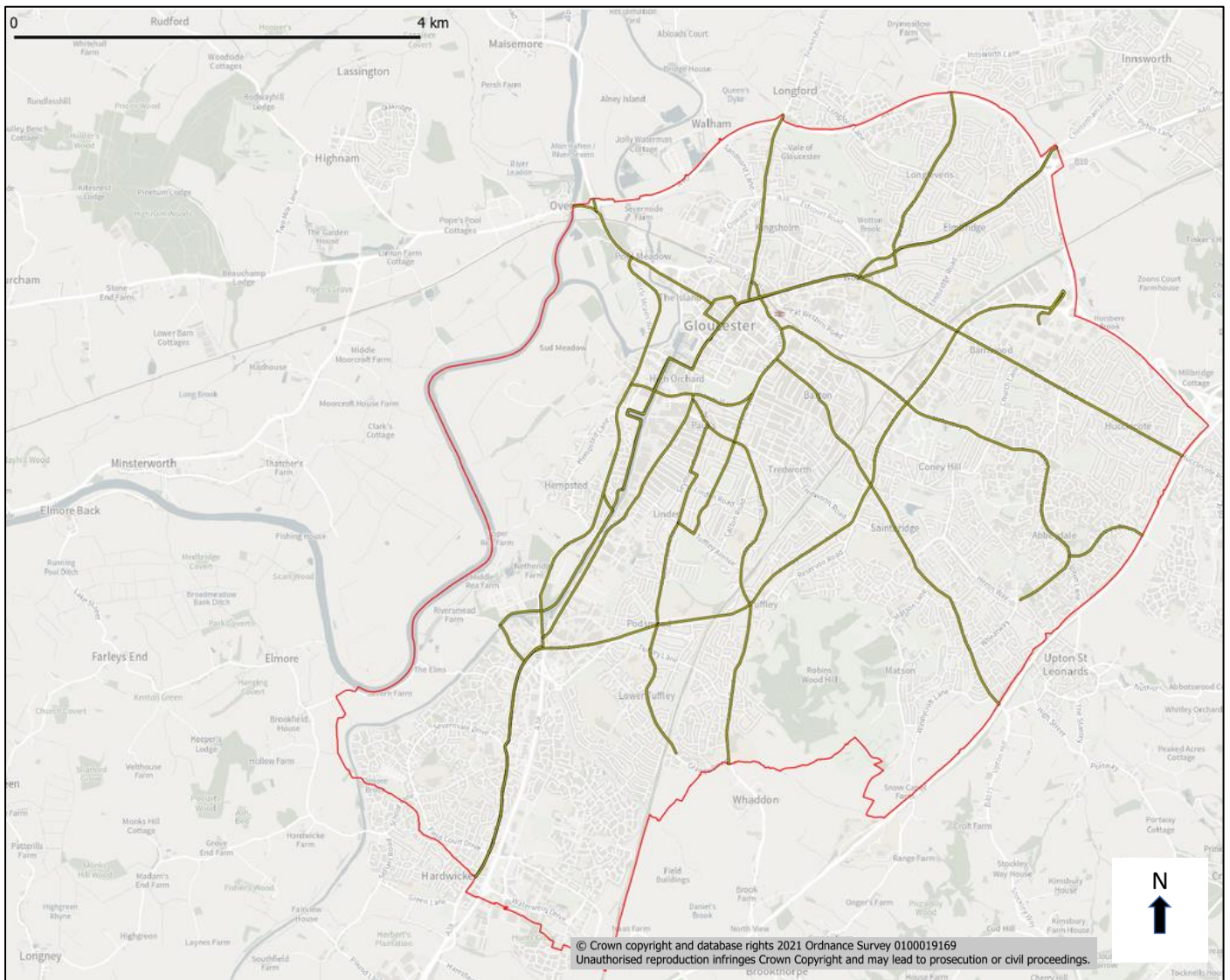
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# Gloucester Cycle Network. Amended, updated to 'Cycle Links'.





LLPG Address Search

Page 152

OS Maps API - Outdoor

50 m

384139.52, 217943.51

17

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The image shows a map interface with a street grid. A prominent red diagonal line runs from the bottom-left to the top-right. Several areas are highlighted in purple. The interface includes a search bar at the top left, a toolbar with navigation icons, a scale bar, and a north arrow. The bottom of the screen displays coordinates and copyright information.



Cheltenham Road Local Centre. Deleted. No Policy Reference in GCP.

LLPG Address Search

Page 153

OS Maps API - Outdoor

50 m

385886.36, 219528.98

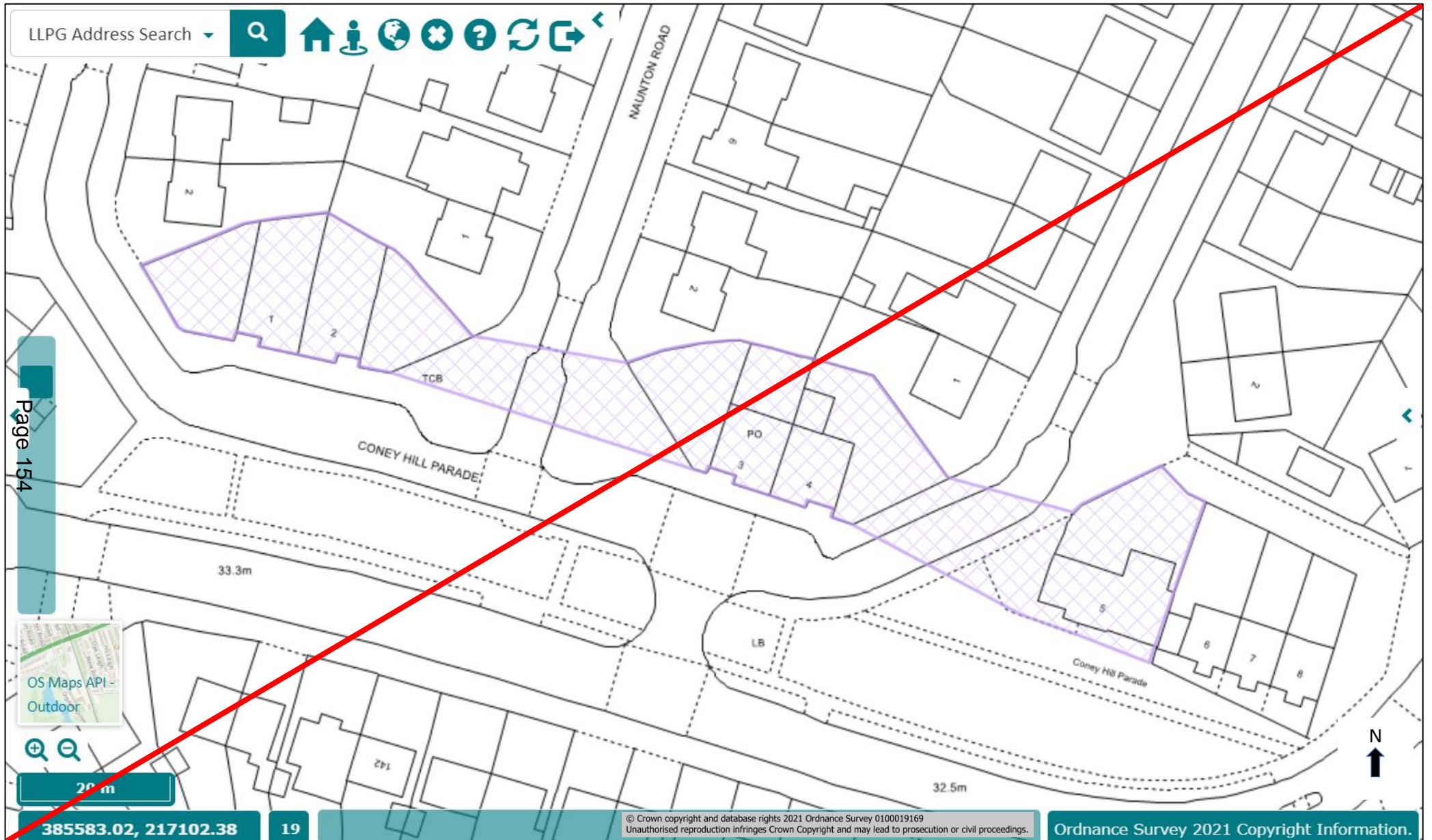
17

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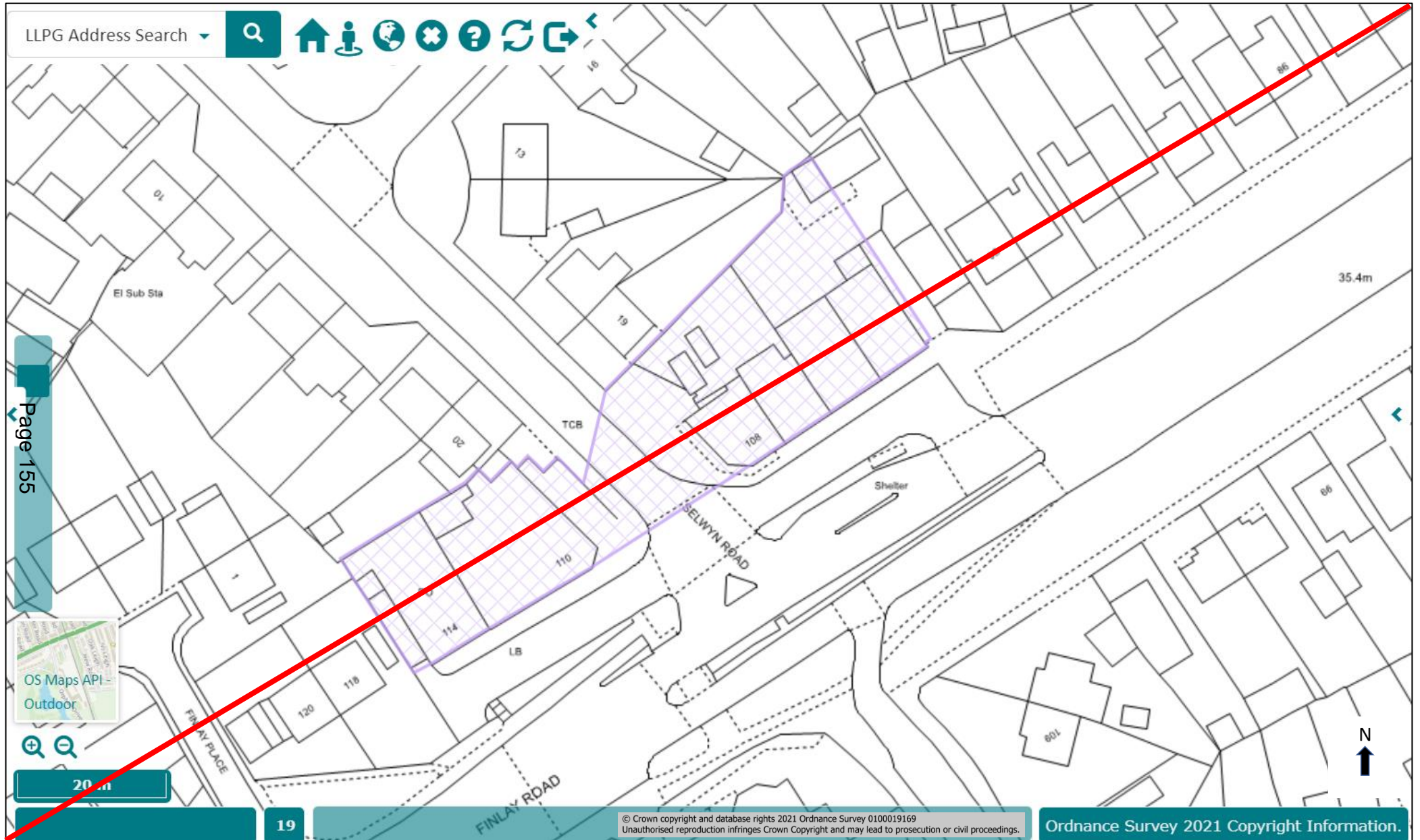
Ordnance Survey 2021 Copyright Information.

The image shows a map interface with a search bar at the top left containing the text 'LLPG Address Search'. Below the search bar are several navigation icons: a magnifying glass, a home icon, a person icon, a globe, a plus sign, a question mark, a refresh icon, and a back arrow. The main map area displays a street grid with a prominent red diagonal line crossing from the bottom-left to the top-right. A purple shaded area highlights a specific section of the street grid. On the left side, there is a vertical teal bar with the text 'Page 153'. In the bottom-left corner, there is a scale bar labeled '50 m' and a coordinate pair '385886.36, 219528.98'. In the bottom-center, there is a page number '17'. In the bottom-right corner, there is a north arrow and a copyright notice: '© Crown copyright and database rights 2021 Ordnance Survey 0100019169. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.' At the very bottom right, there is another copyright notice: 'Ordnance Survey 2021 Copyright Information.'









LLPG Address Search



Page 155



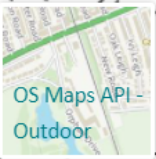
19

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Holmleigh Parade Local Centre. Deleted. No Policy Reference in GCP.

The image shows a map interface with a search bar at the top left containing the text "LLPG Address Search". To the right of the search bar are several icons: a magnifying glass, a home icon, a person icon, a globe, a plus sign, a question mark, a refresh icon, and a share icon. The map itself shows a street layout with a central area highlighted in a purple grid pattern and labeled "Holmleigh Parade". This area contains numbered buildings (1-10, 11-20, 21-30) and is labeled with "LB", "PO", and "FB". A prominent red diagonal line runs from the bottom left to the top right across the map. Other features include a "Shelter" icon, a "20 m" scale bar, a north arrow, and a small inset map in the bottom left corner. The bottom of the map has a teal footer with the coordinates "382284.41, 214734.91", the page number "19", and copyright information: "© Crown copyright and database rights 2021 Ordnance Survey 0100019169. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings." and "Ordnance Survey 2021 Copyright Information."



20 m

382284.41, 214734.91

19

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LLPG Address Search

Page 157

OS Maps API - Outdoor

50 m

387096.90, 217647.52

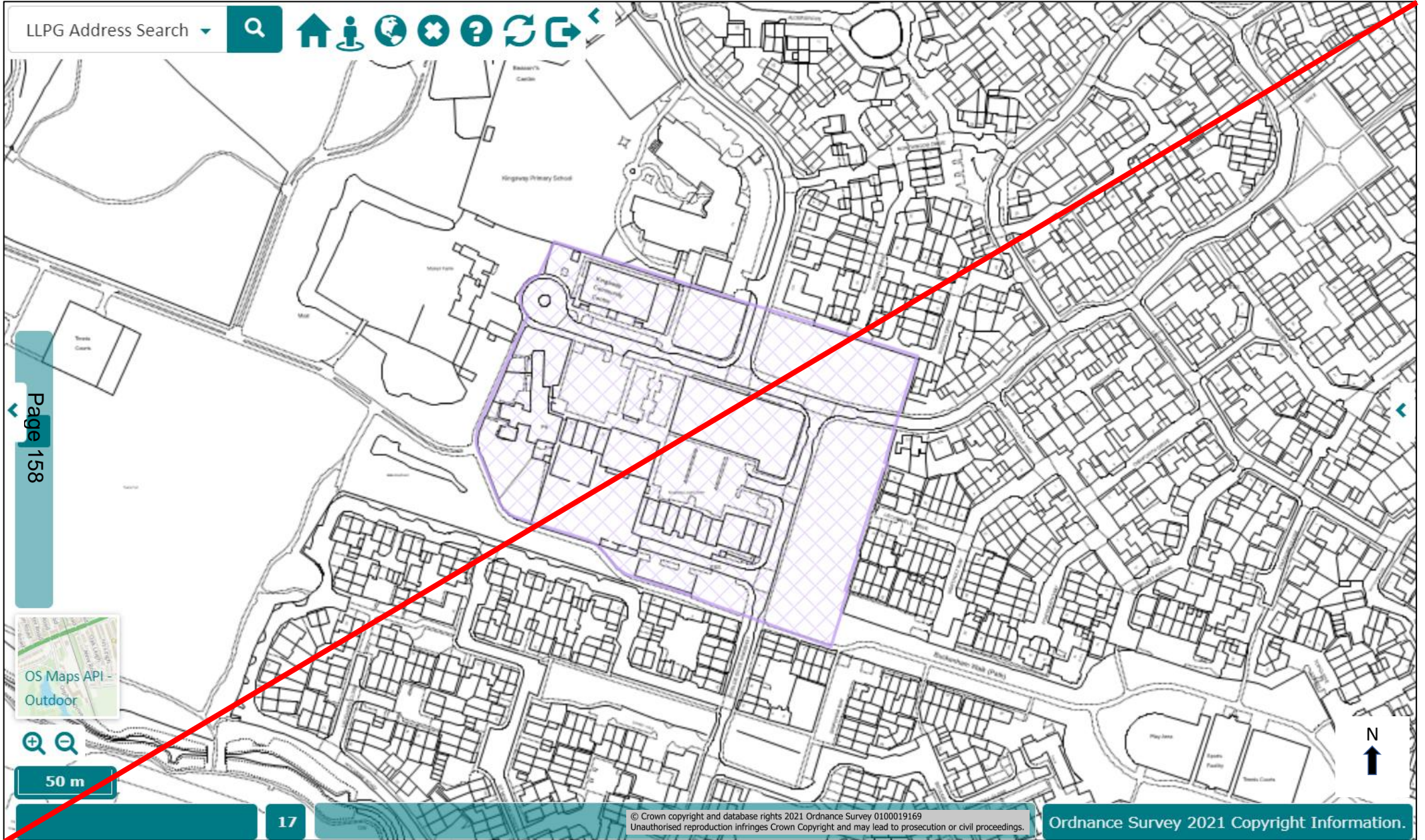
17

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The map displays a street grid with a prominent red diagonal line crossing from the bottom-left to the top-right. Several rectangular areas are highlighted in purple, primarily along the streets that run parallel to the red line. The map interface includes a search bar at the top left, a toolbar with navigation icons (home, location, globe, zoom, search, refresh, back), a scale bar for 50 meters, a north arrow, and a page number '17'.





LLPG Address Search



Page 158



50 m

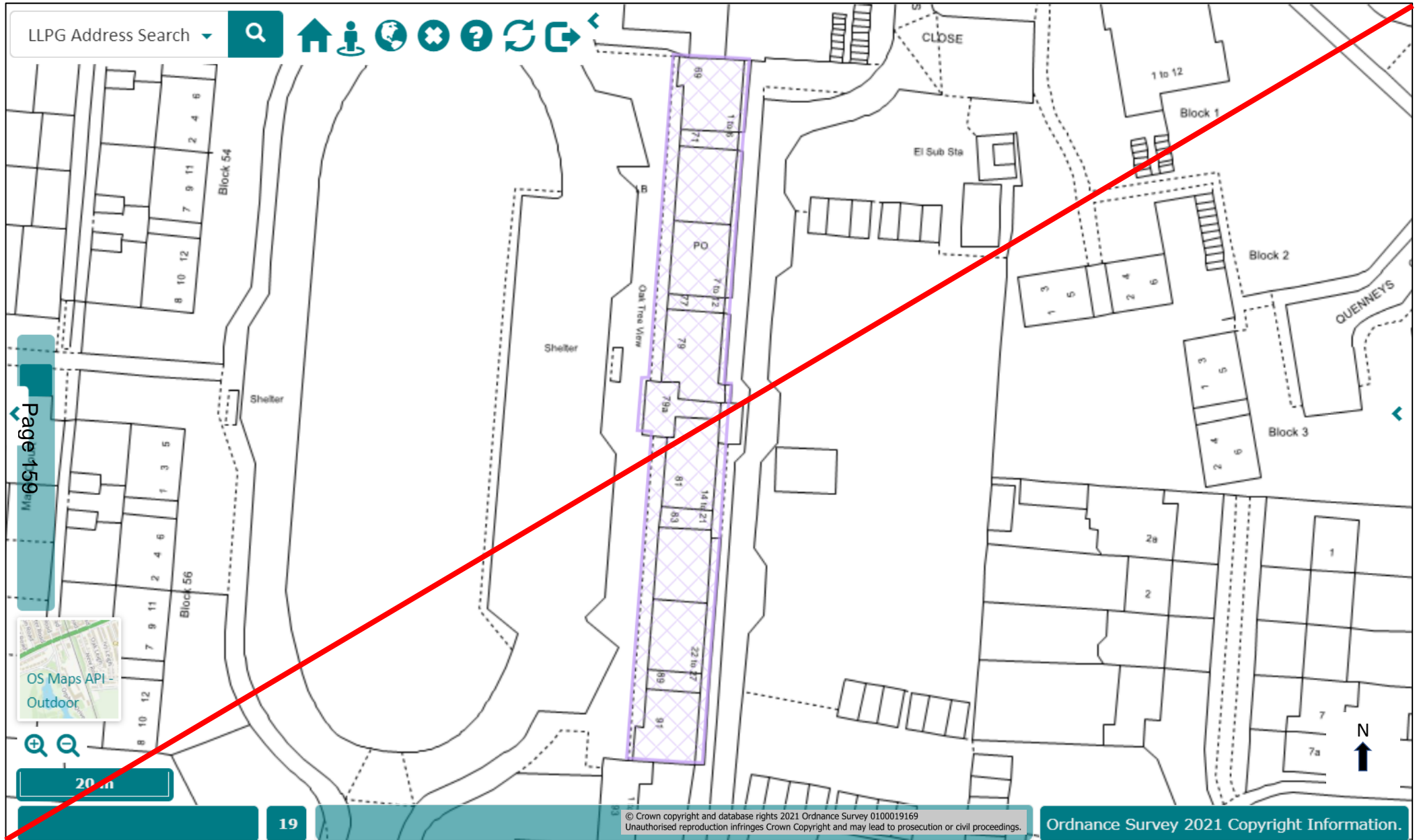
17

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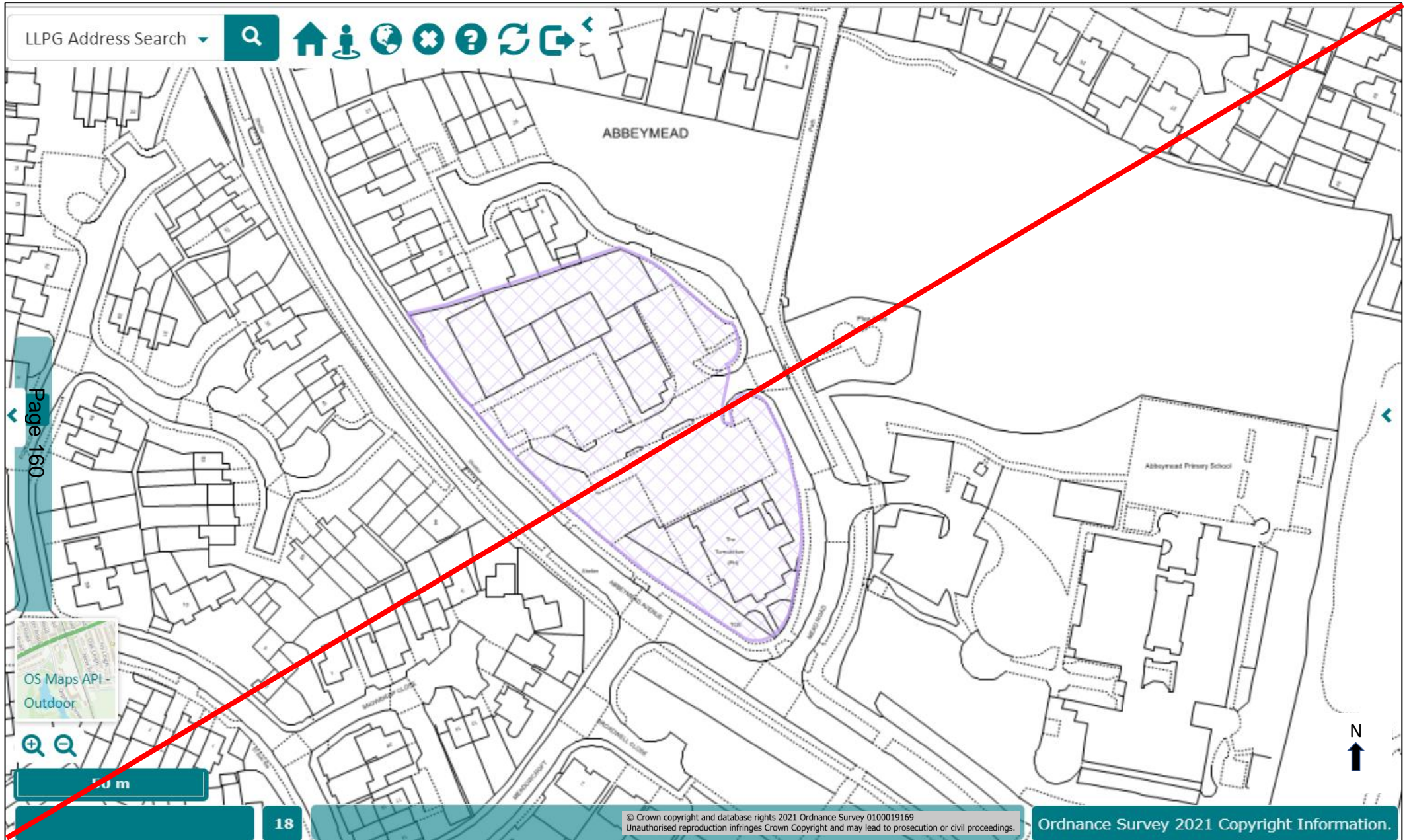


Matson Avenue Local Centre. Deleted. No Policy Reference in GCP.





LLPG Address Search         



ABBEYMEAD

Abbeymead Primary School

Page 160

OS Maps API - Outdoor

50 m

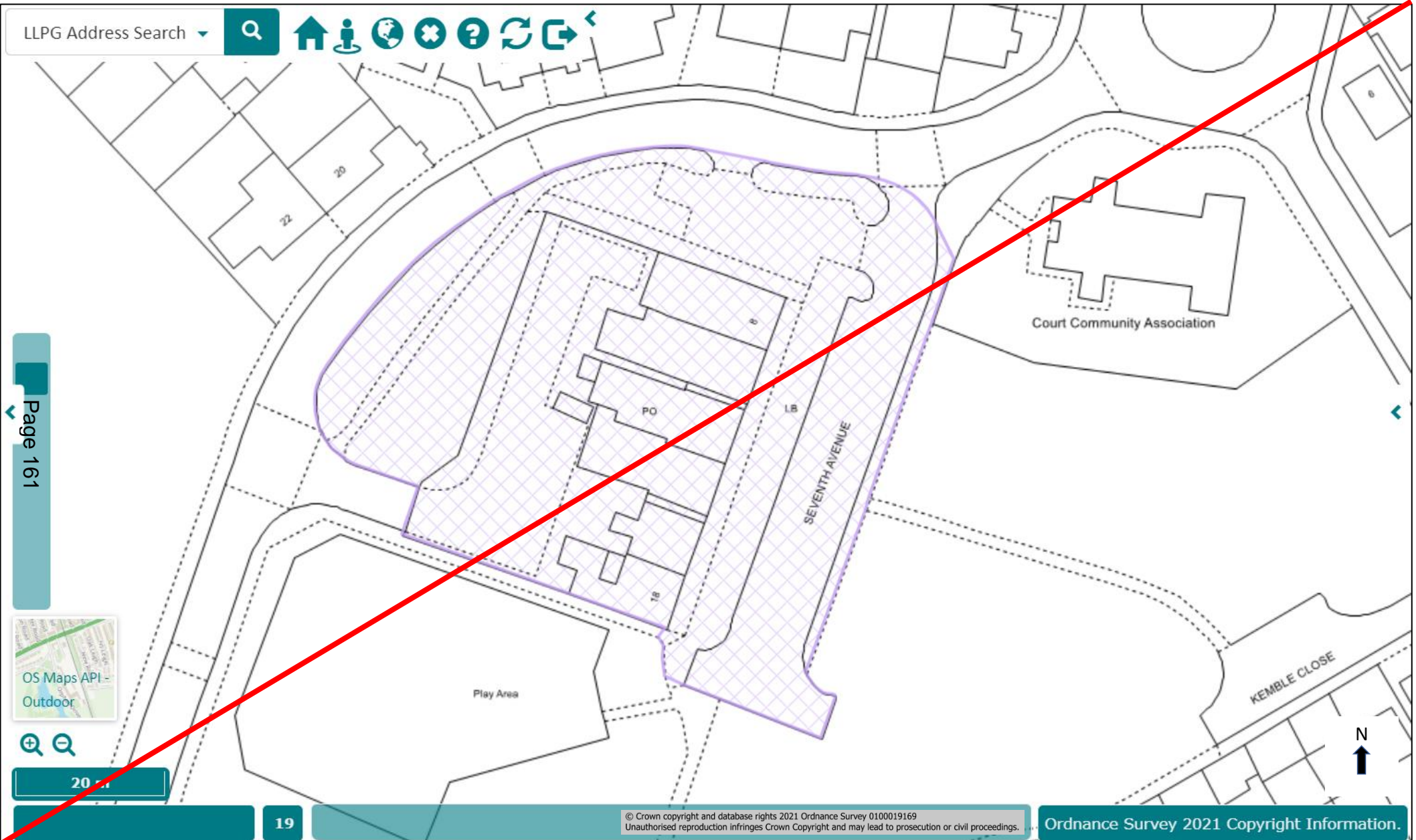

18

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N

LLPG Address Search



Map labels: 22, 26, PO, LB, SEVENTH AVENUE, Play Area, Court Community Association, KEMBLE CLOSE, N

Page 161

OS Maps API - Outdoor

20 m

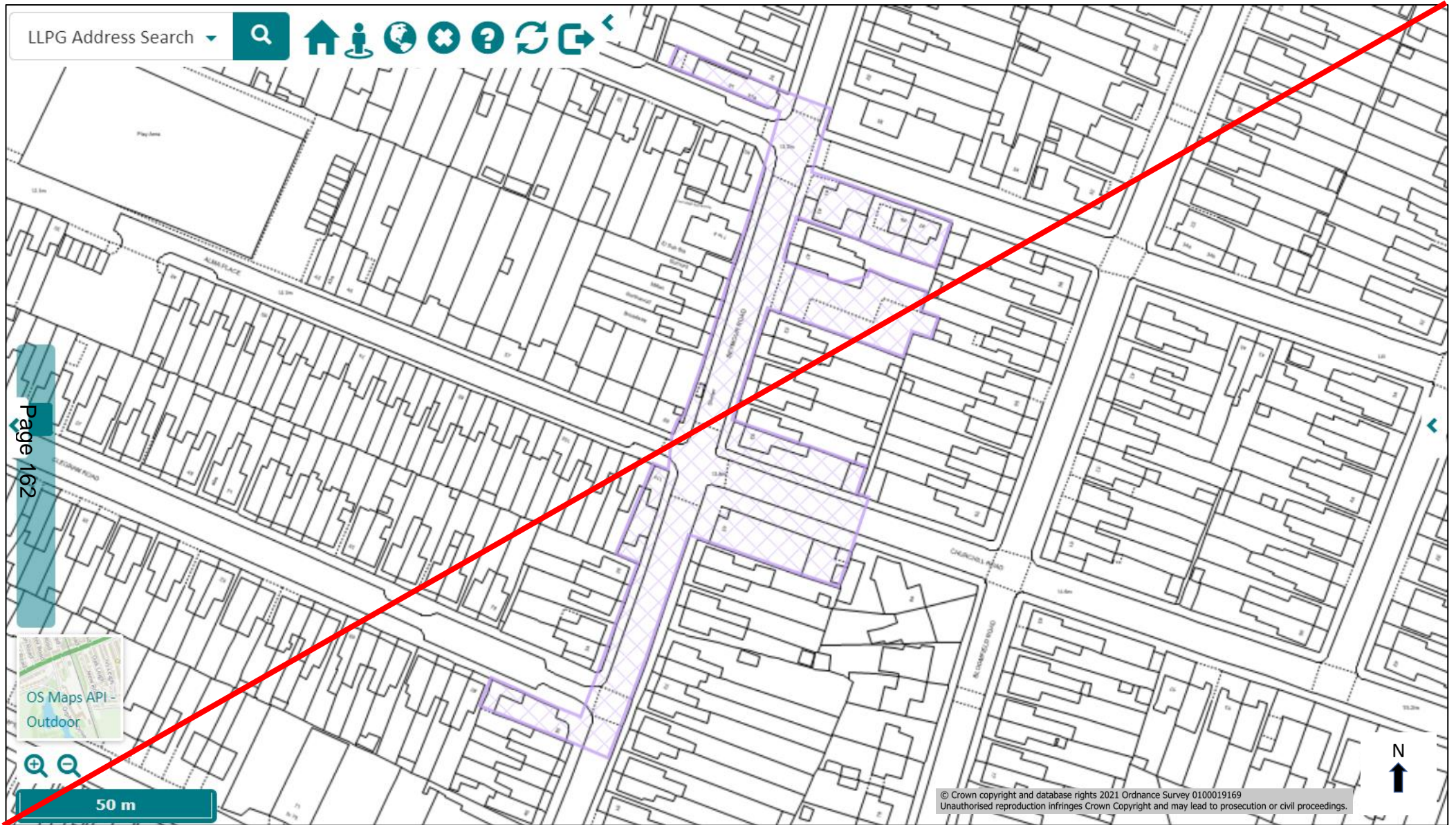
19

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Seymour Road 1 Local Centre. Deleted. No Policy Reference in GCP.














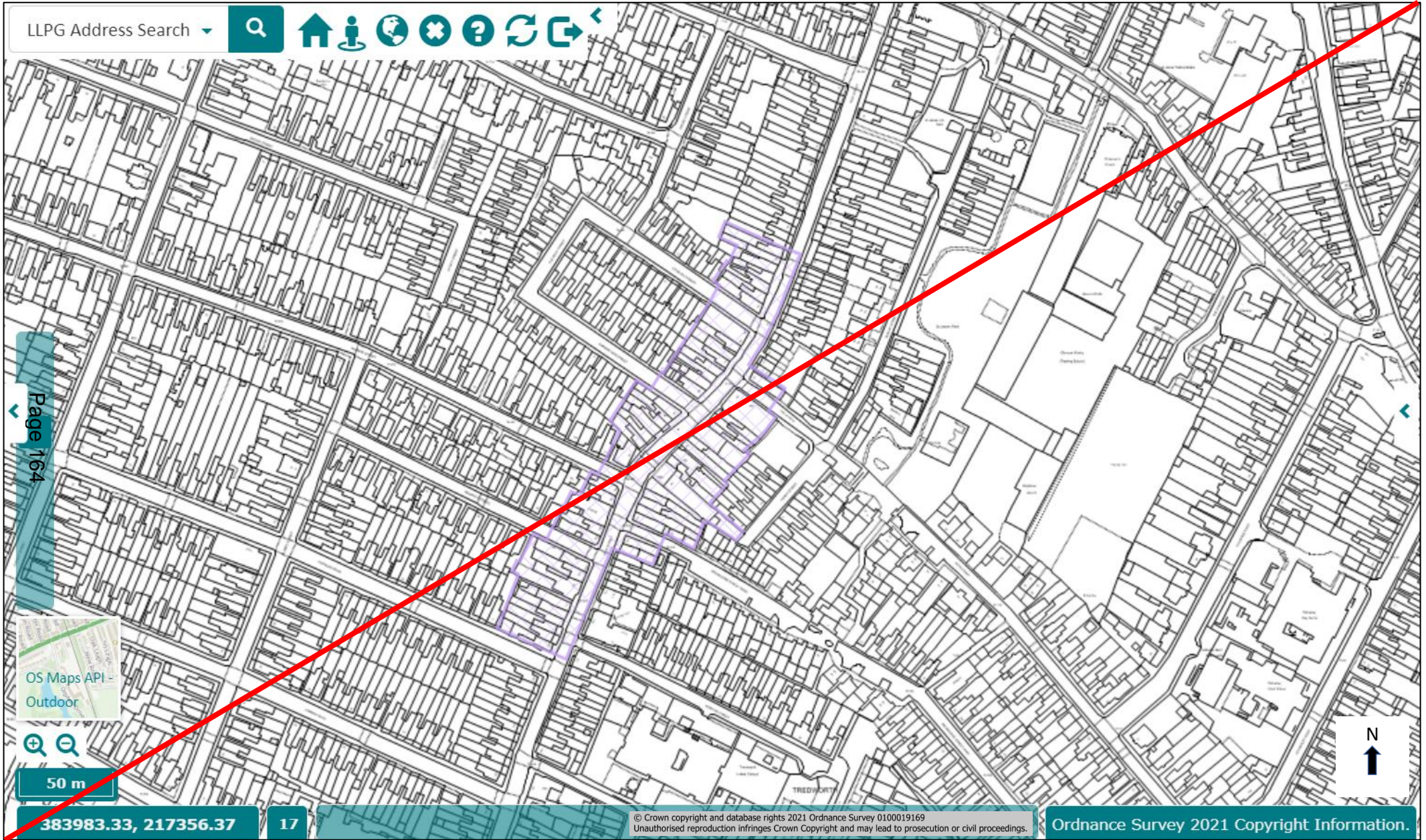
Seymour Road 1 Local Centre. Deleted. No Policy Reference in GCP.

The image is a screenshot of a web-based map application. At the top left, there is a search bar labeled "LLPG Address Search" with a magnifying glass icon and several navigation icons (home, person, globe, cross, question mark, refresh, back). The main map area shows a detailed street grid with building footprints. A prominent red diagonal line runs from the bottom-left to the top-right across the map. Several buildings are highlighted with a light purple outline. In the bottom-left corner, there is a scale bar showing "50 m" and a coordinate box containing the text "382803.22, 216855.02". To the right of the scale bar is a page number "18". At the bottom center, there is a copyright notice: "© Crown copyright and database rights 2021 Ordnance Survey 0100019169. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings." On the bottom right, there is a box for "Ordnance Survey 2021 Copyright Information." and a north arrow icon. On the left side, there is a vertical teal bar with the text "Page 163" and a small inset map labeled "OS Maps API - Outdoor".



Tredworth High Street Local Centre. Deleted. No Policy Reference in GCP.

LLPG Address Search         



Page 164

OS Maps API - Outdoor

50 m

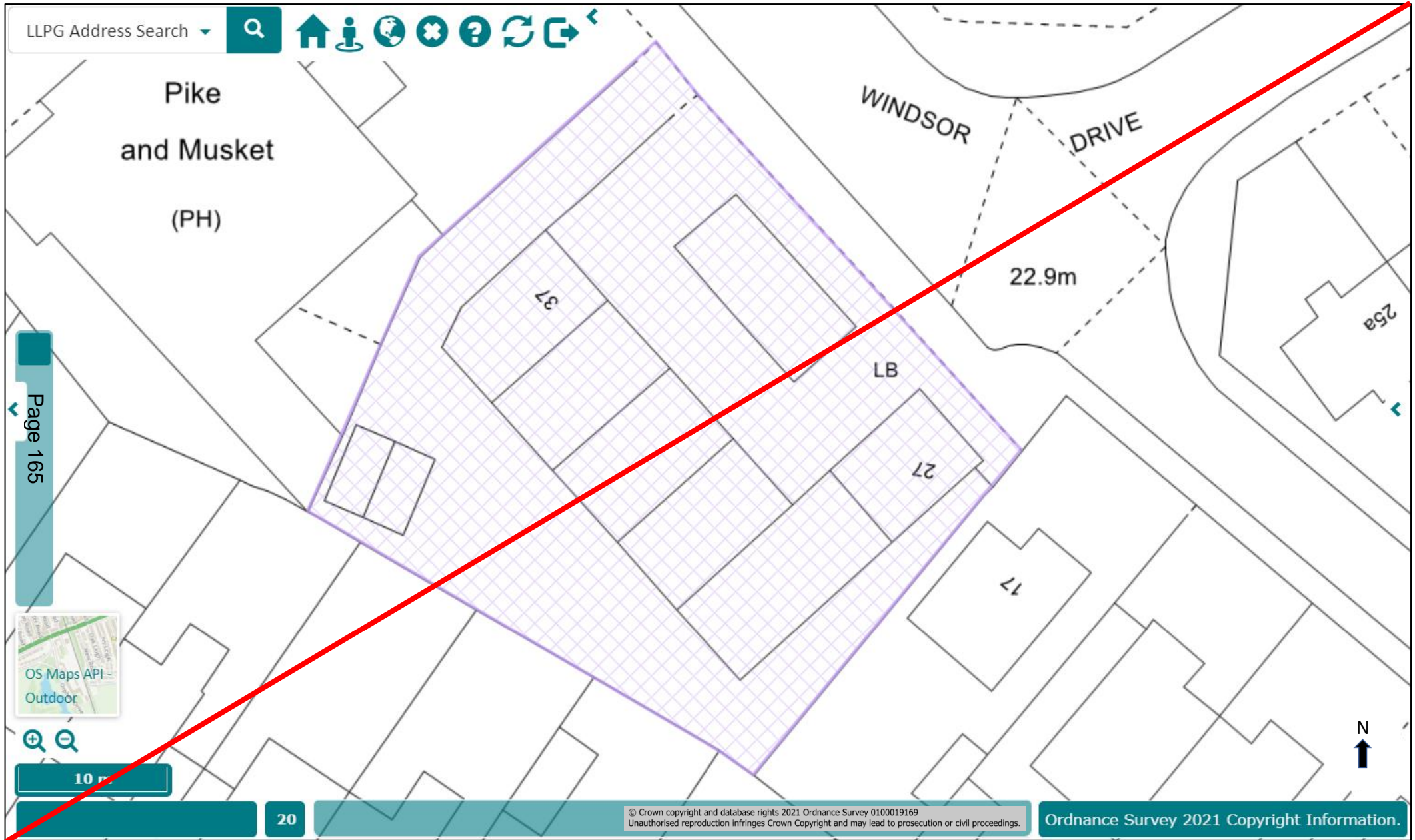
383983.33, 217356.37 17

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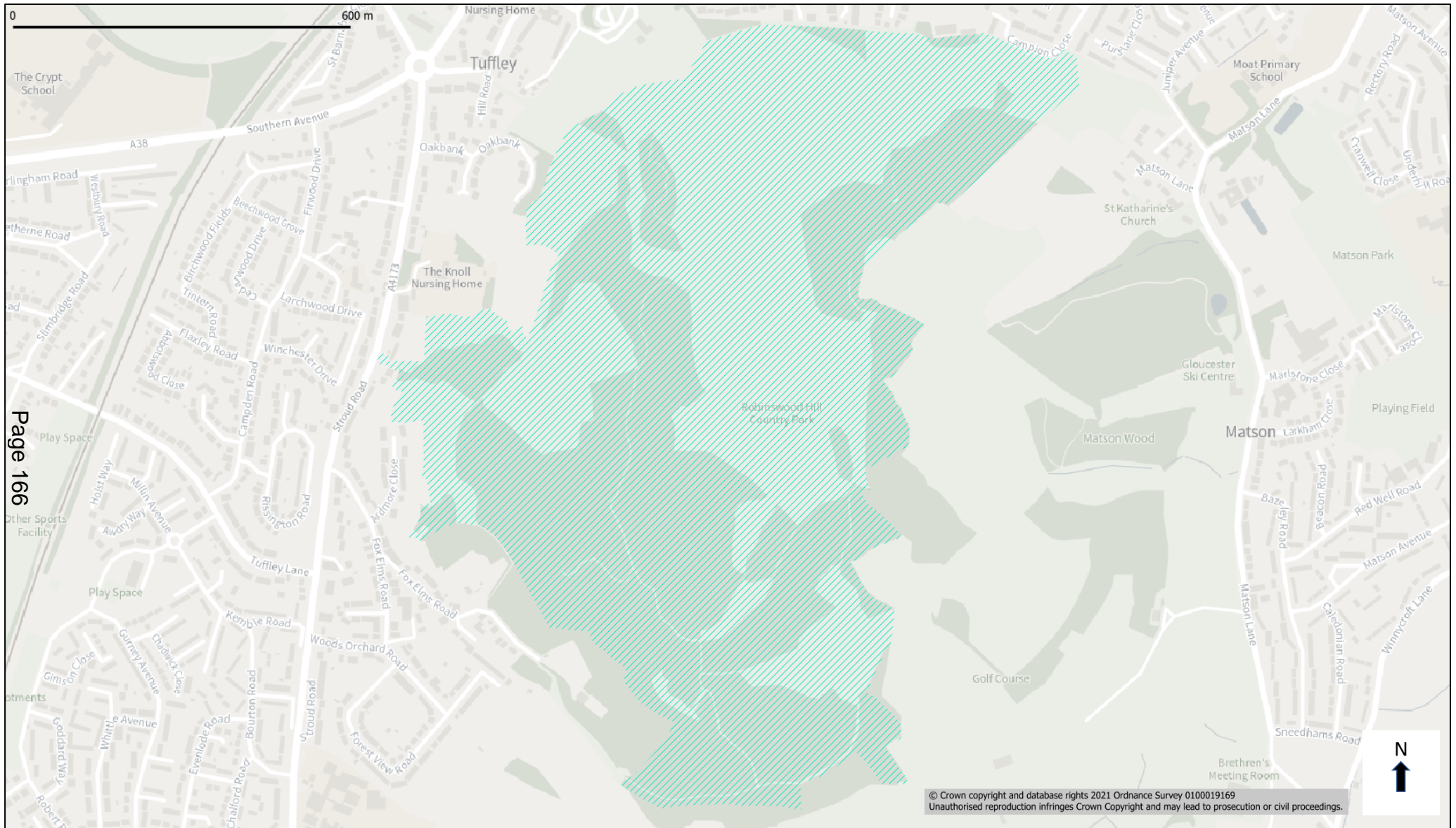
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N



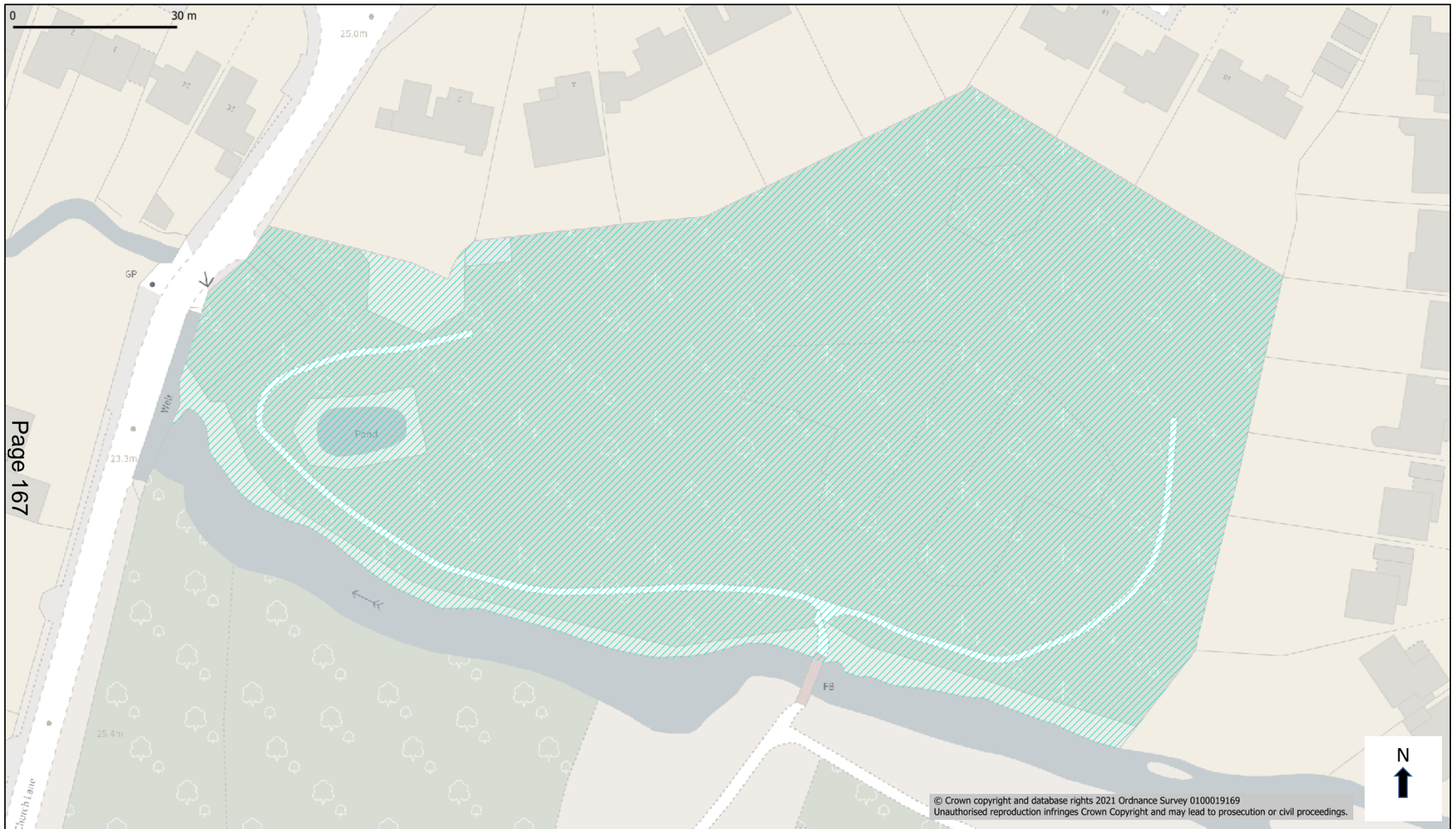


Local Nature Reserve. Robinswood Hill. Added.

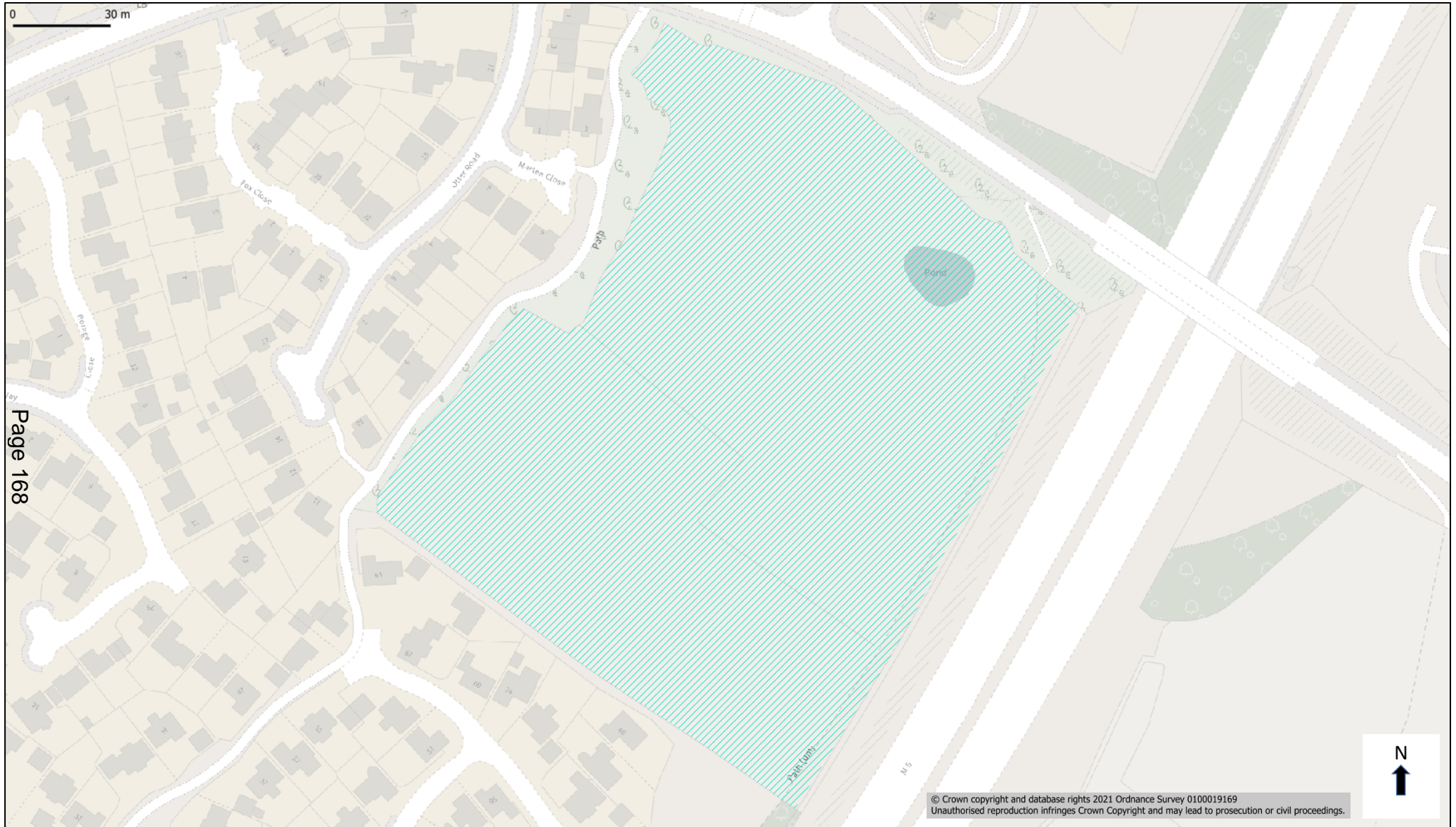




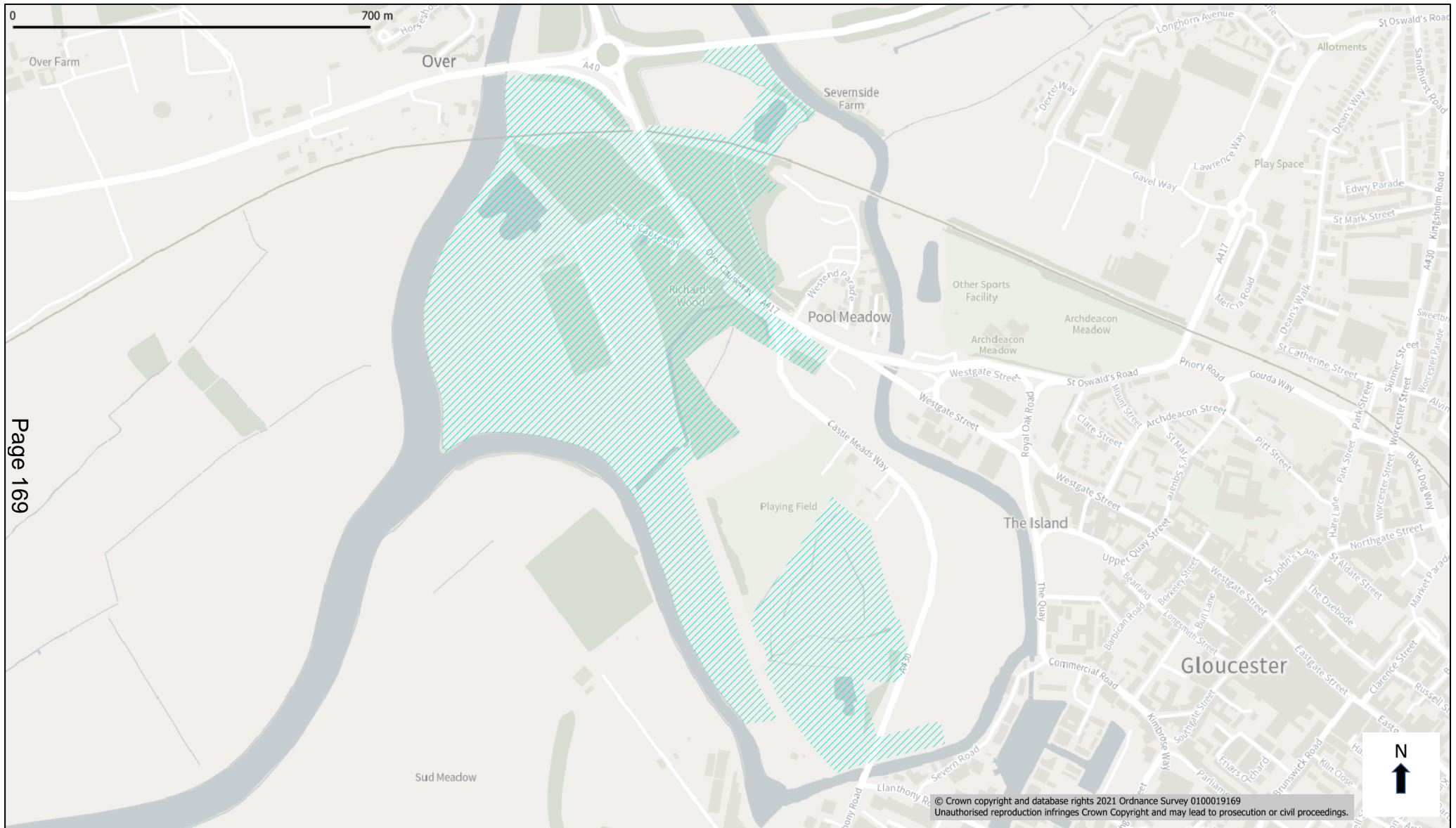
Local Nature Reserve. Barnwood Arboretum. Added.



Local Nature Reserve. Hucclecote Meadows. Added.

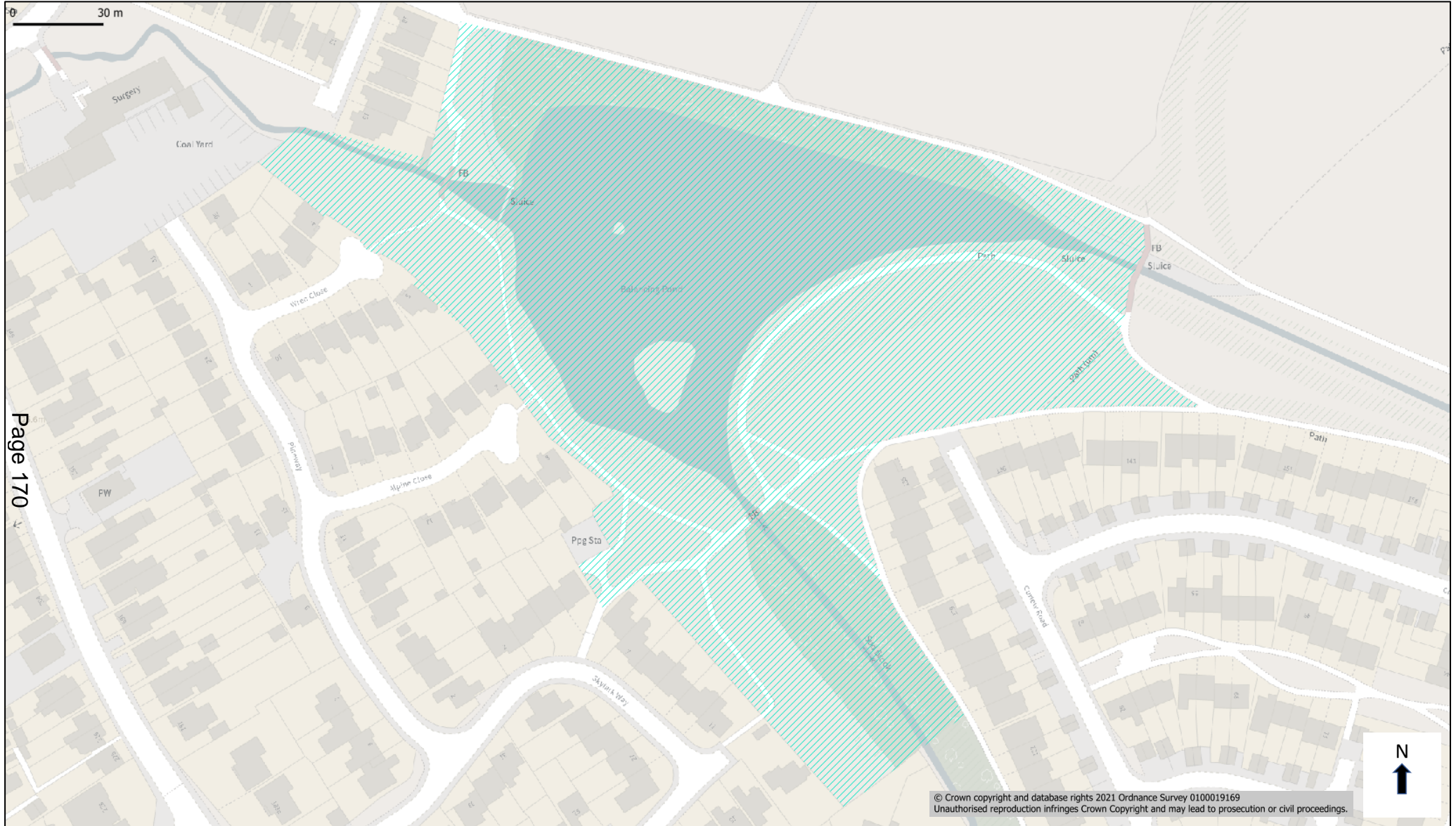


Local Nature Reserve. Alney Island. Added.



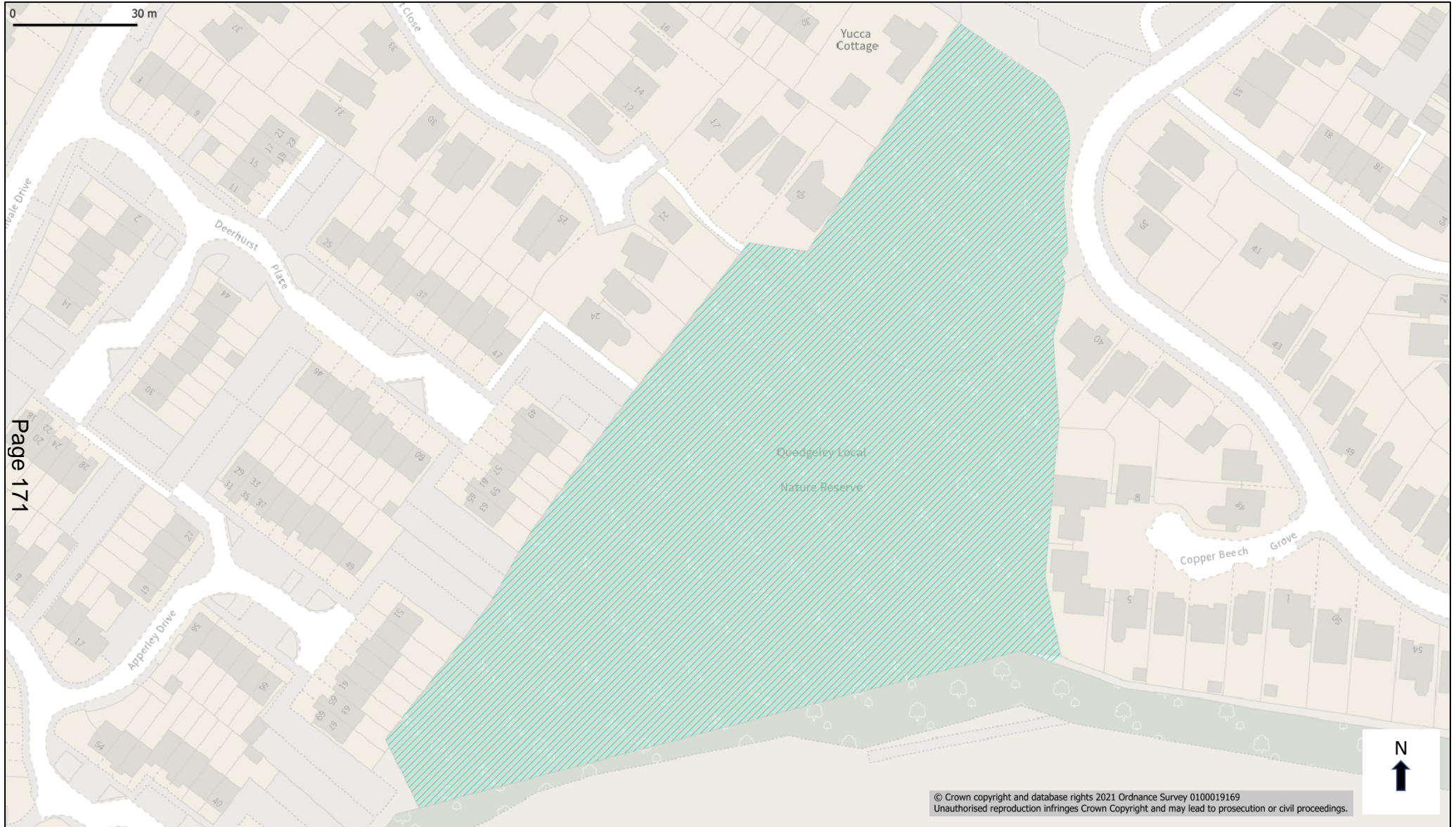


Local Nature Reserve. Saintbridge Balancing Pond. Added.

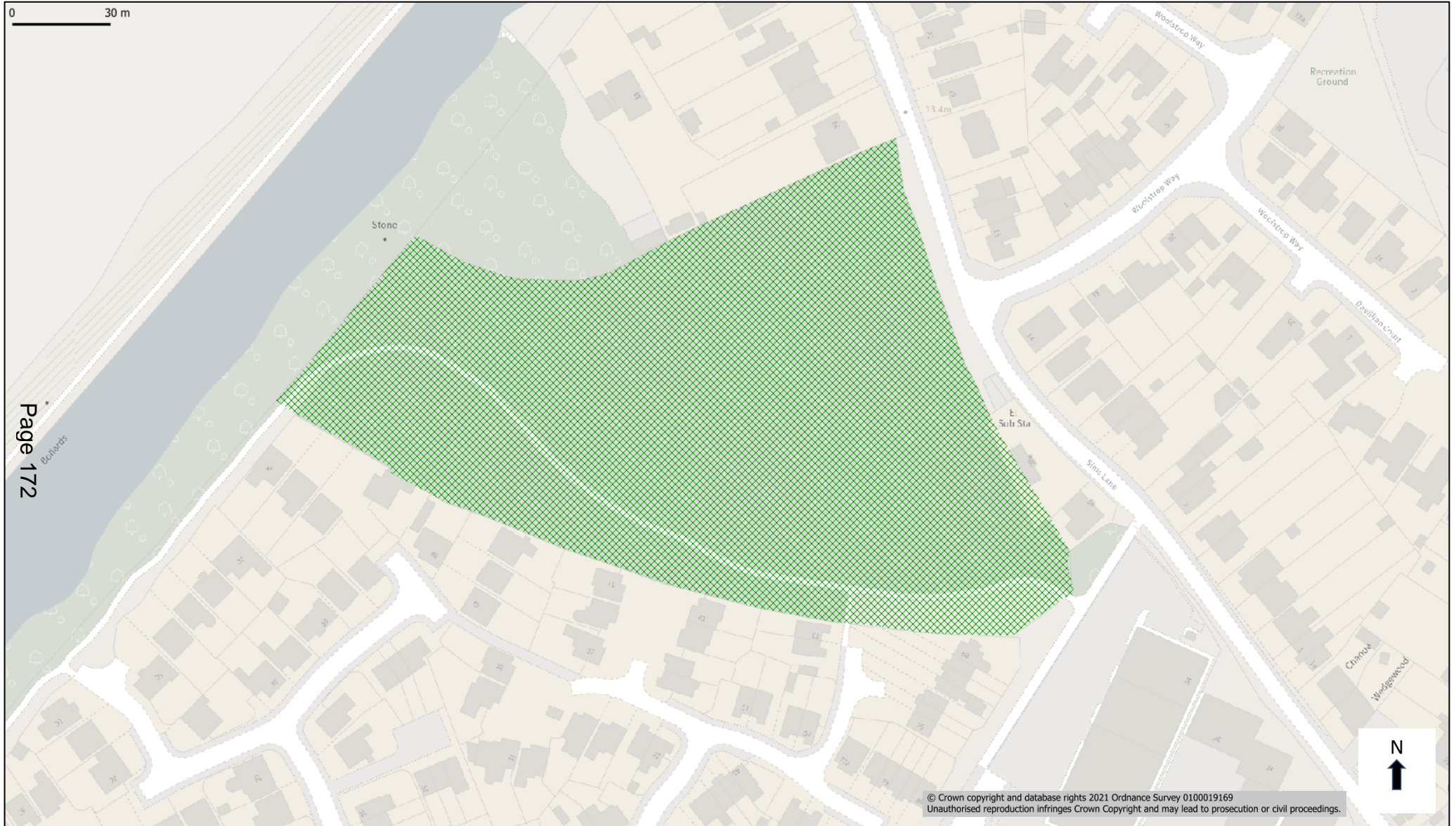




Local Nature Reserve. Quedgeley Arboretum (Maximus woods). Added.

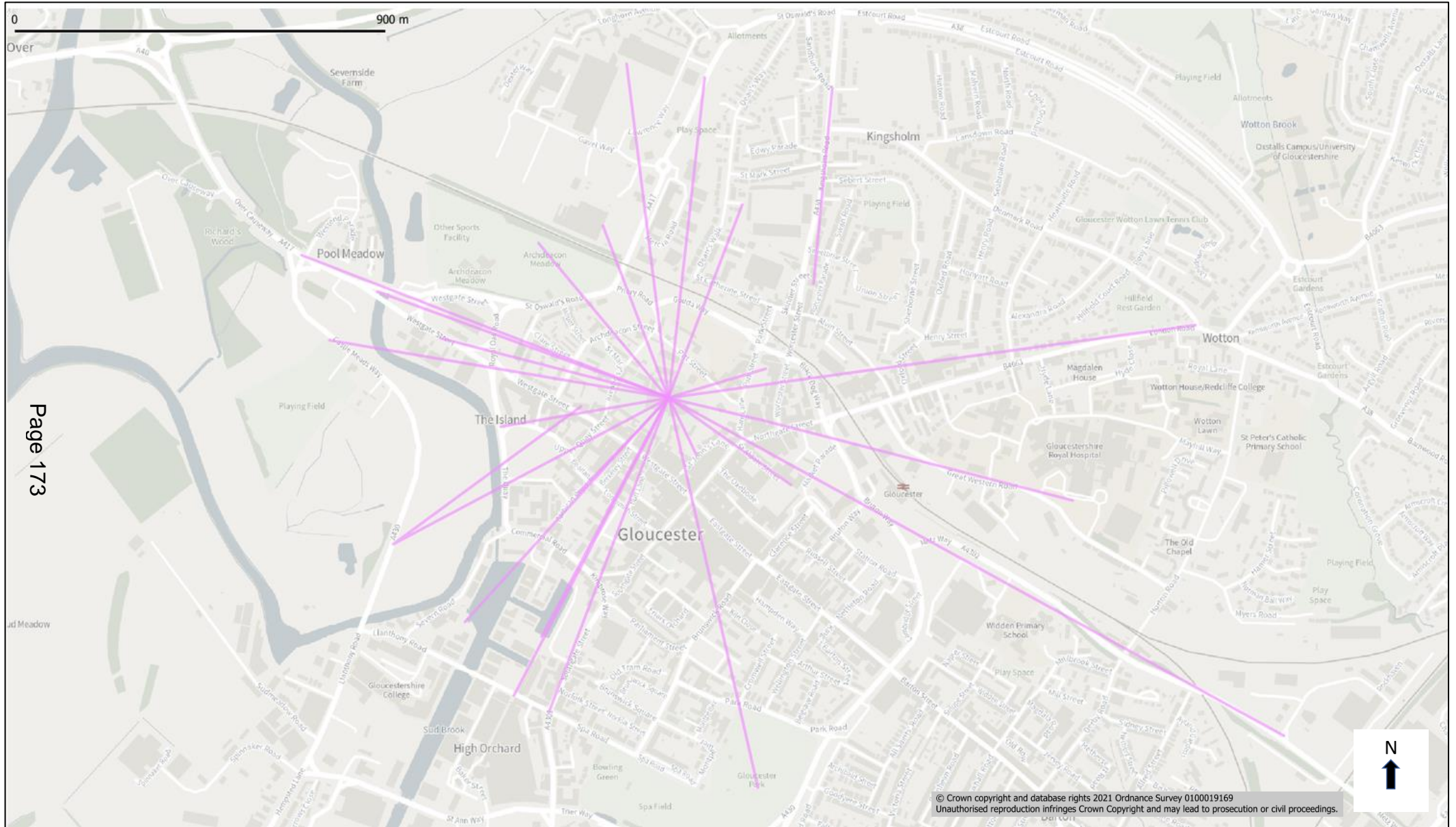


Local Nature Reserve. Green Farm Orchard. Added.

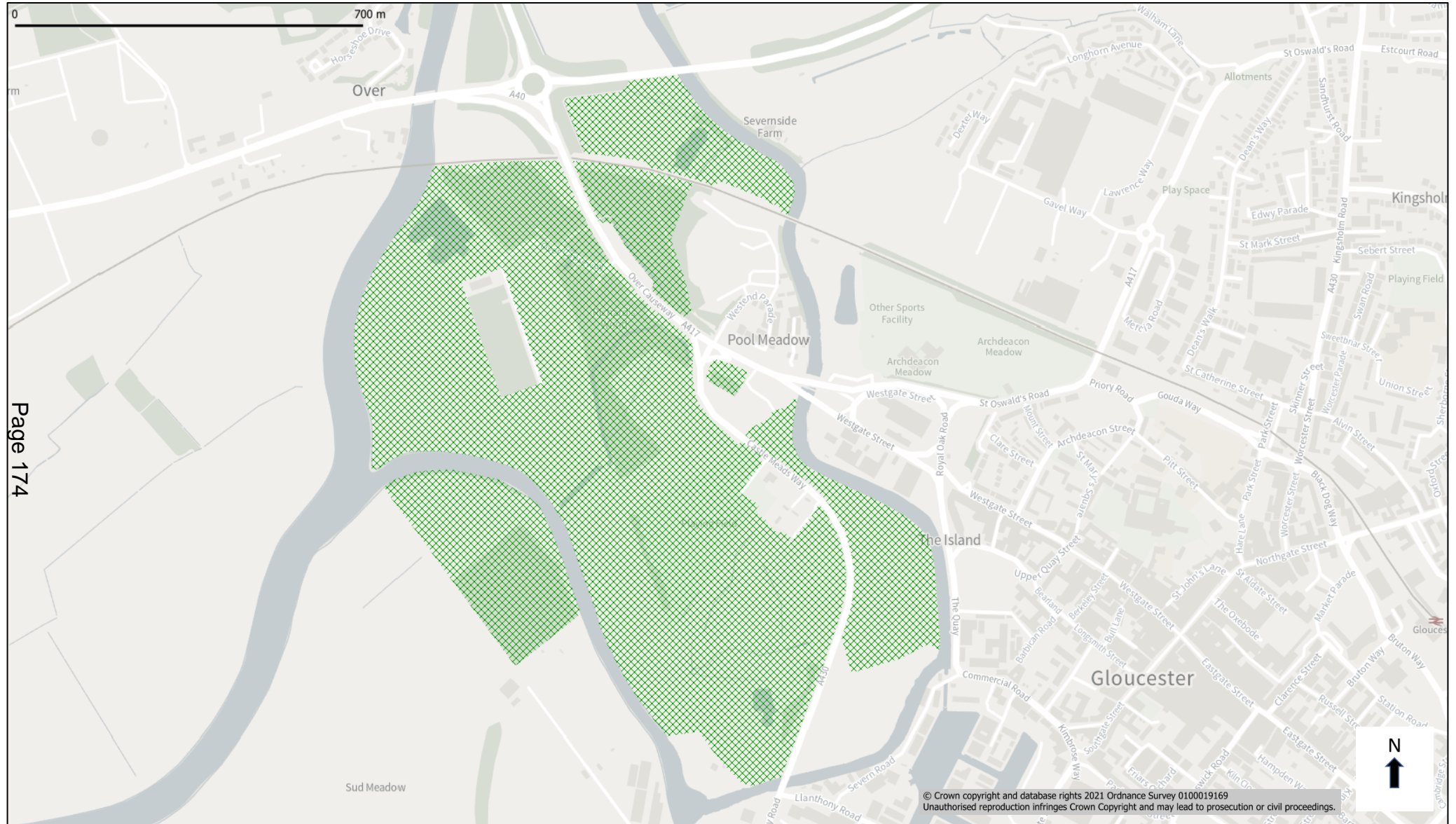




Local View Corridors (to the Cathedral and historic places of worship). Added.

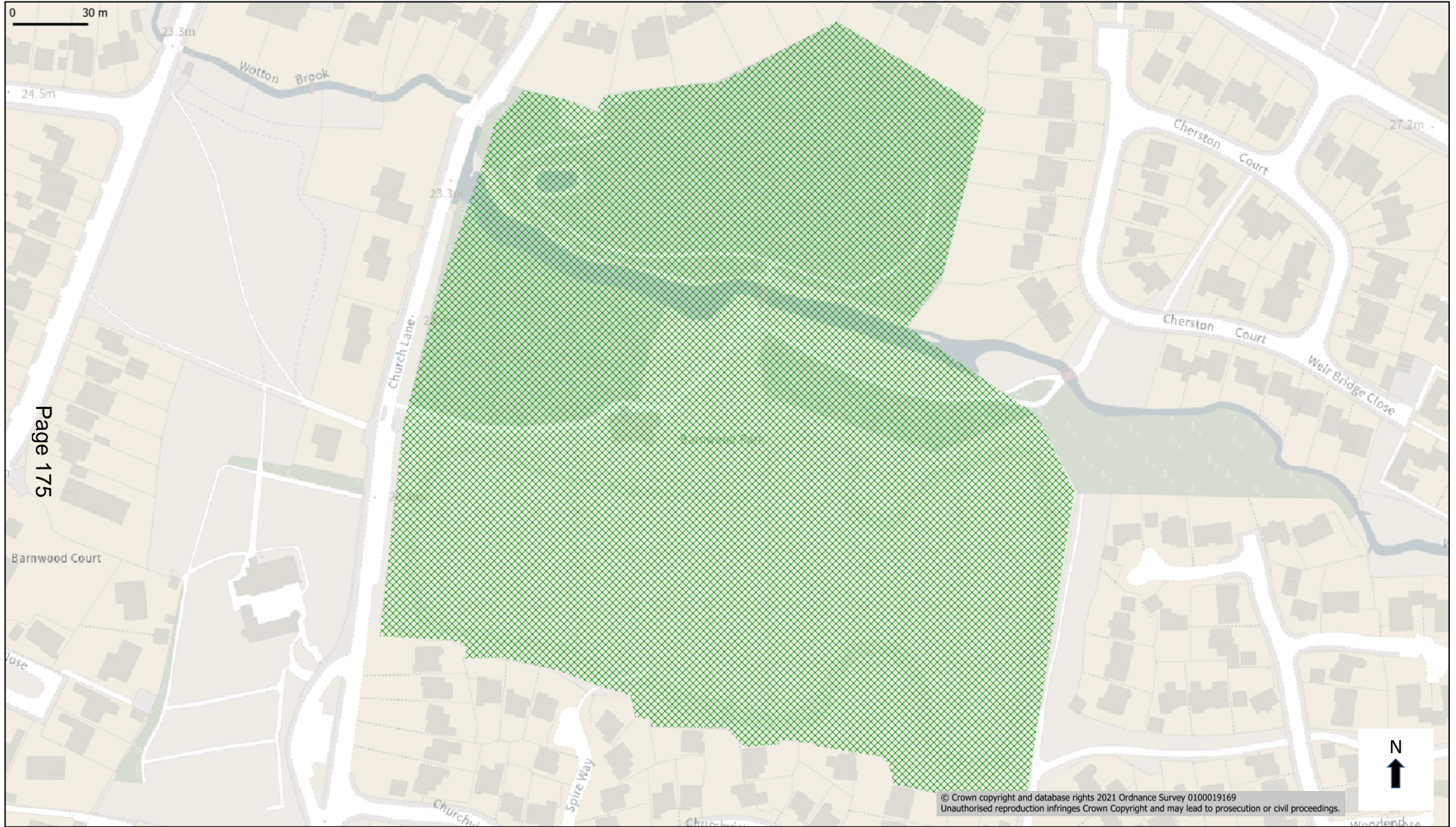


Local Wildlife Site. Alney Island. Added.



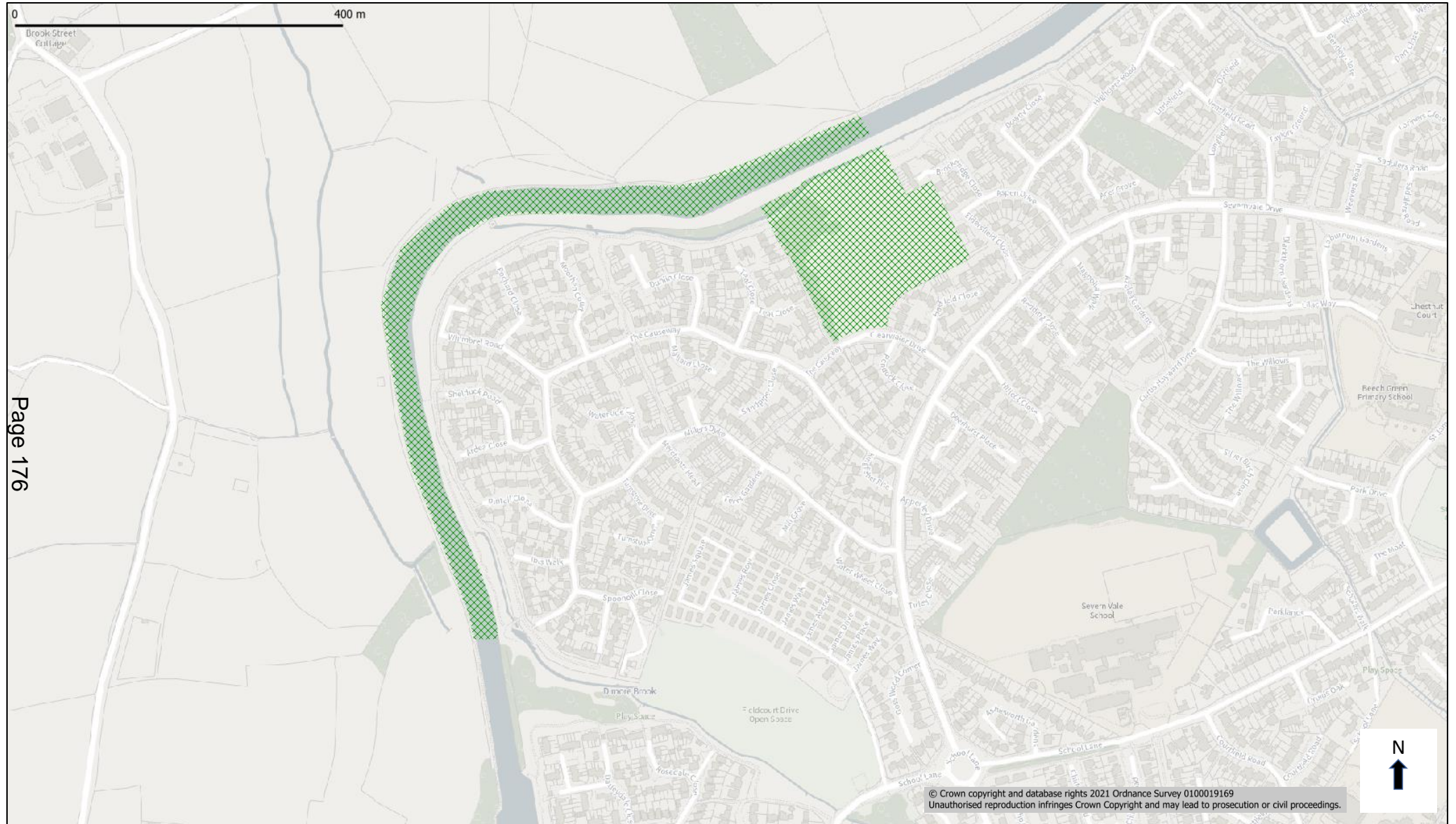


Barnwood Park Arboretum and Park. Local Wildlife Site. Added.

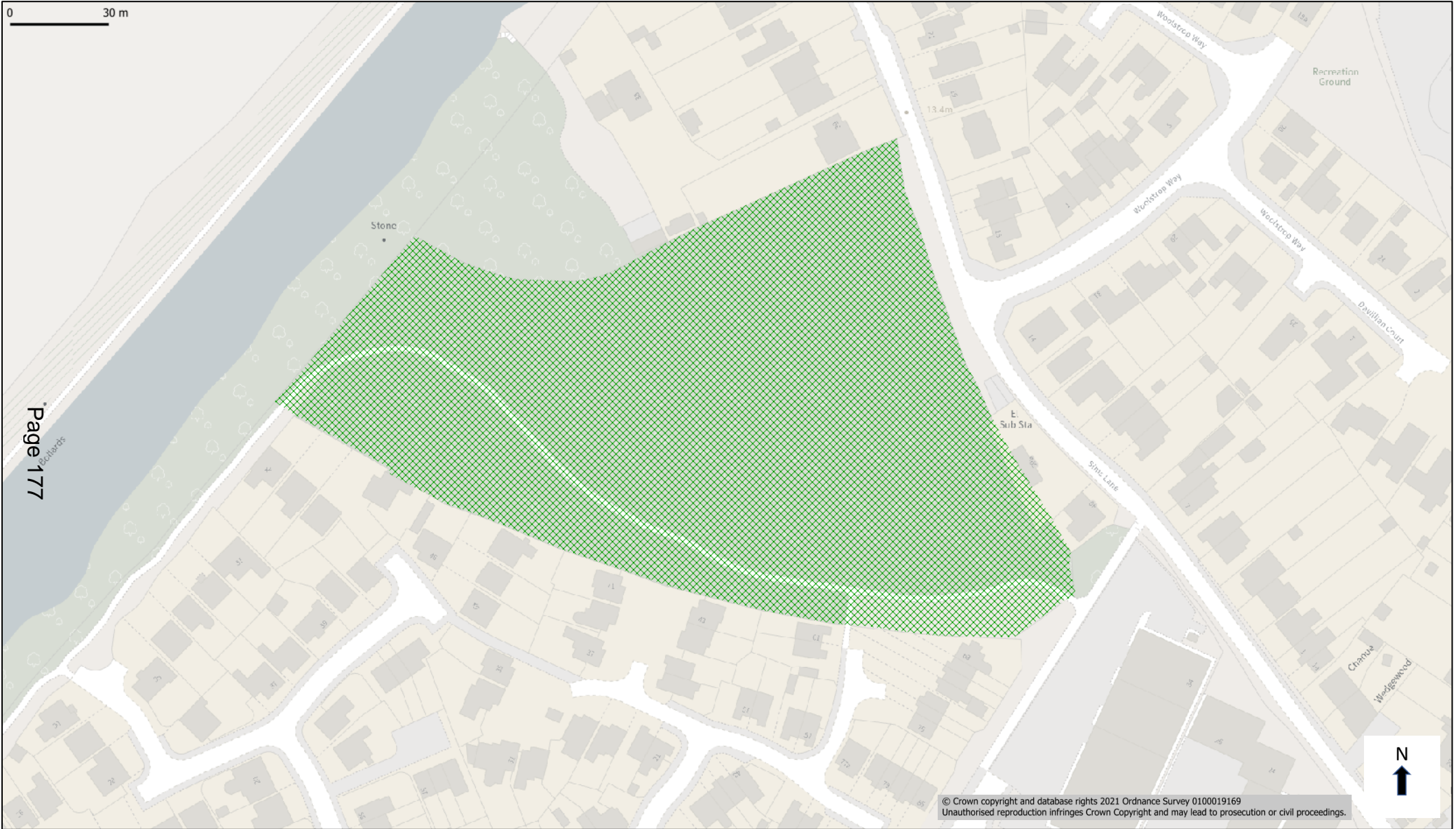




Local Wildlife Site. Gloucester & Sharpness Canal plus The Causeway. Added.

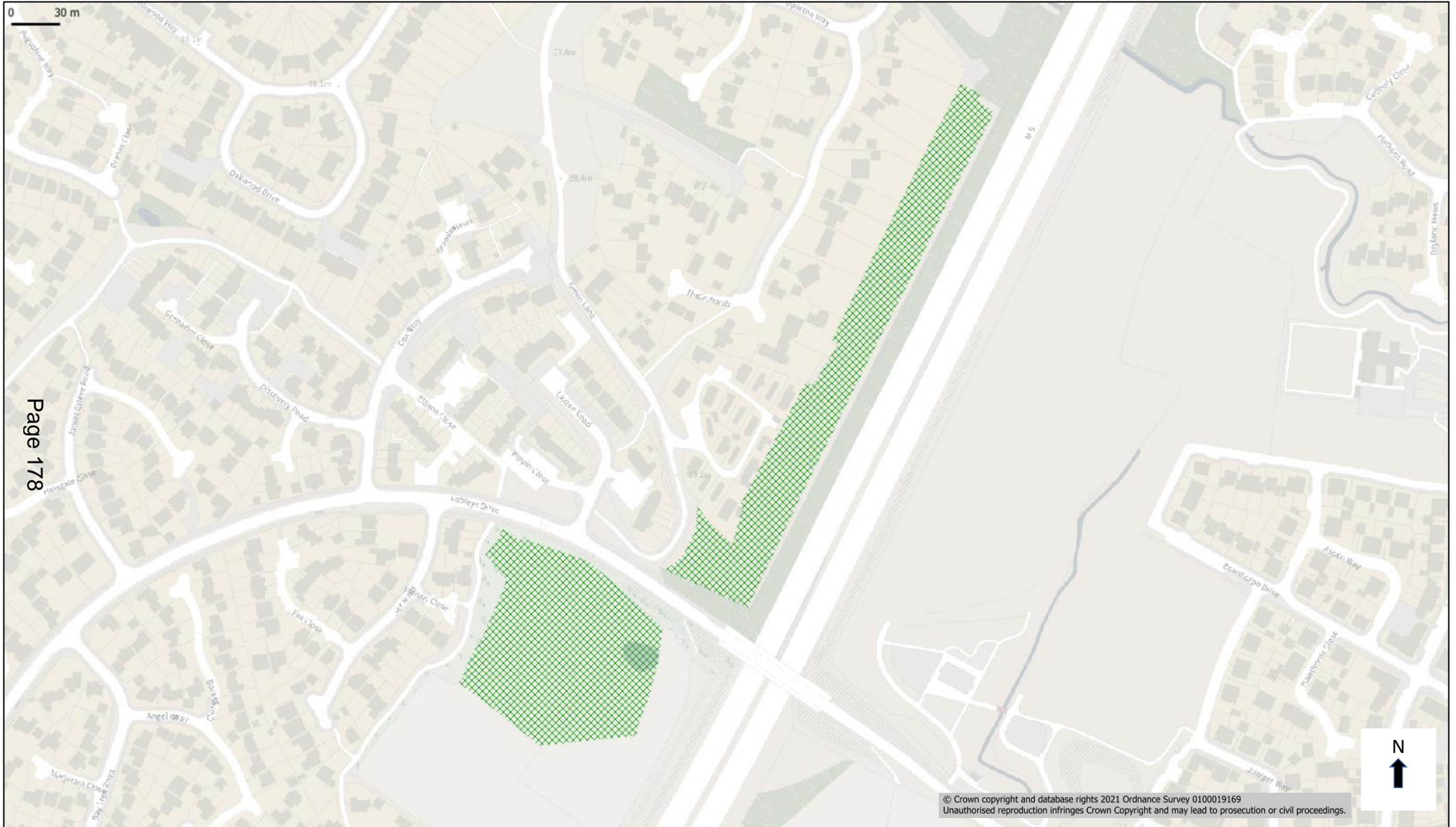


Local Wildlife Site. Green Farm Orchard. Added.



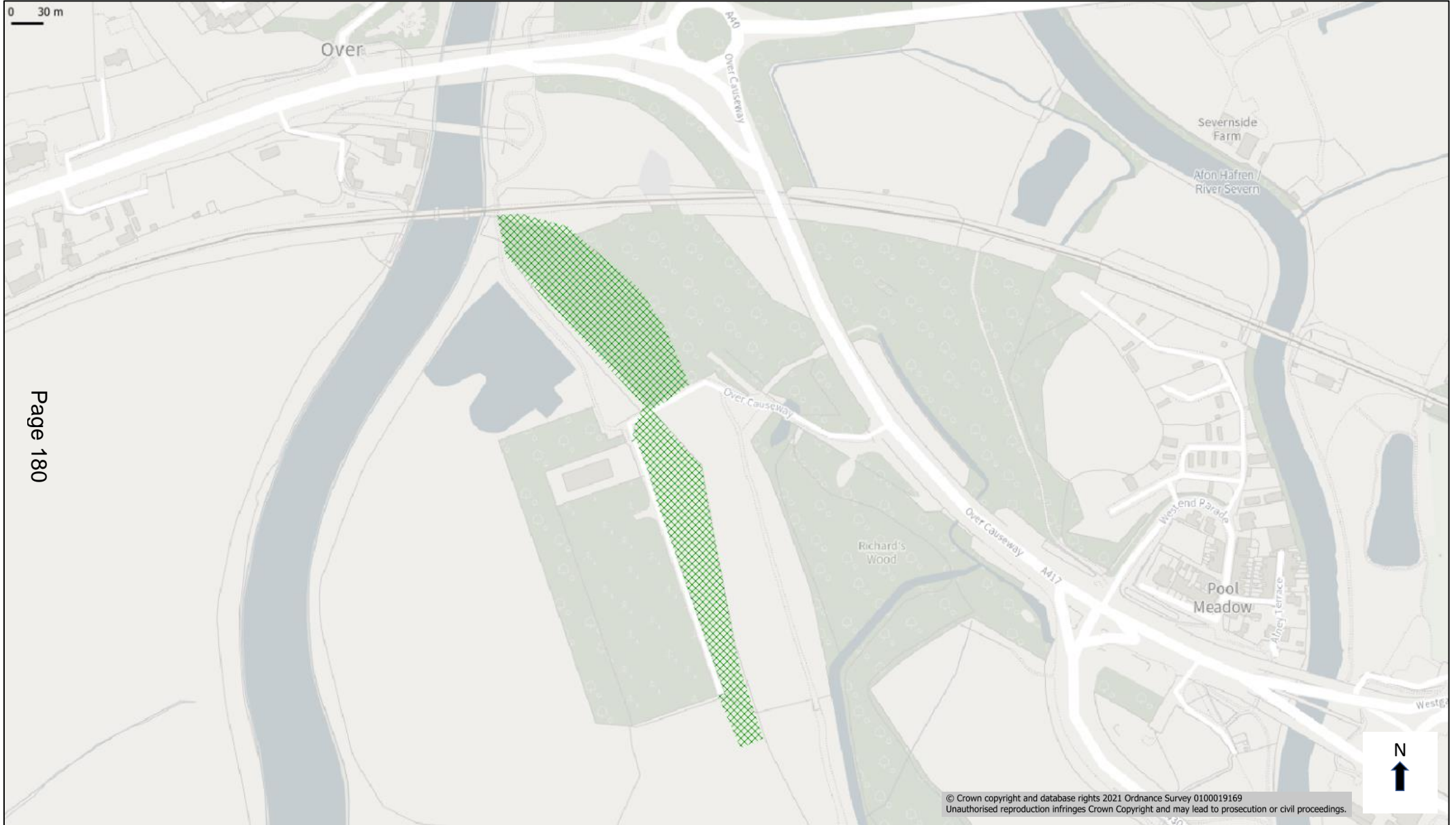


Local Wildlife Site. Hucclecote Meadows. Added.

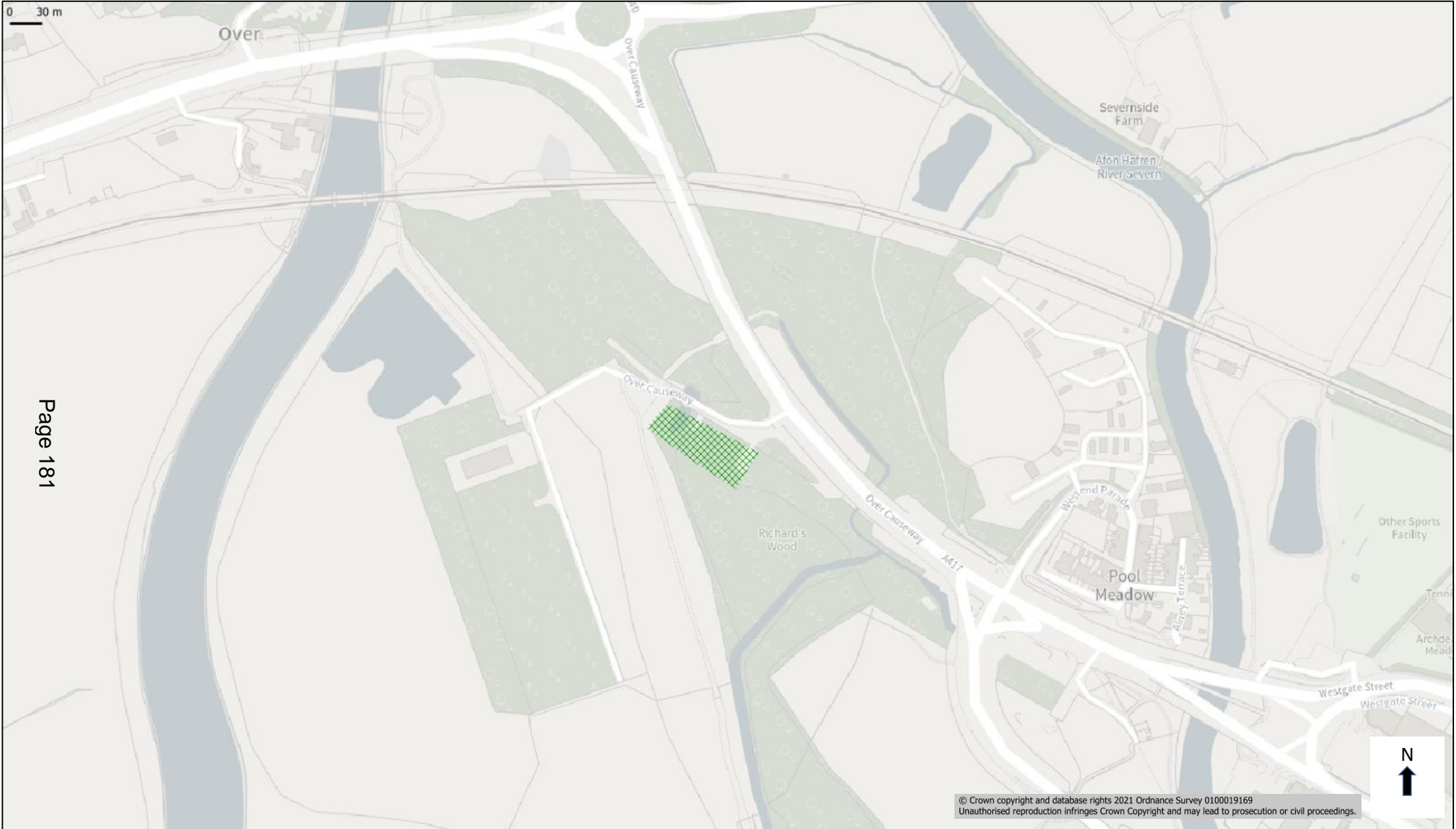




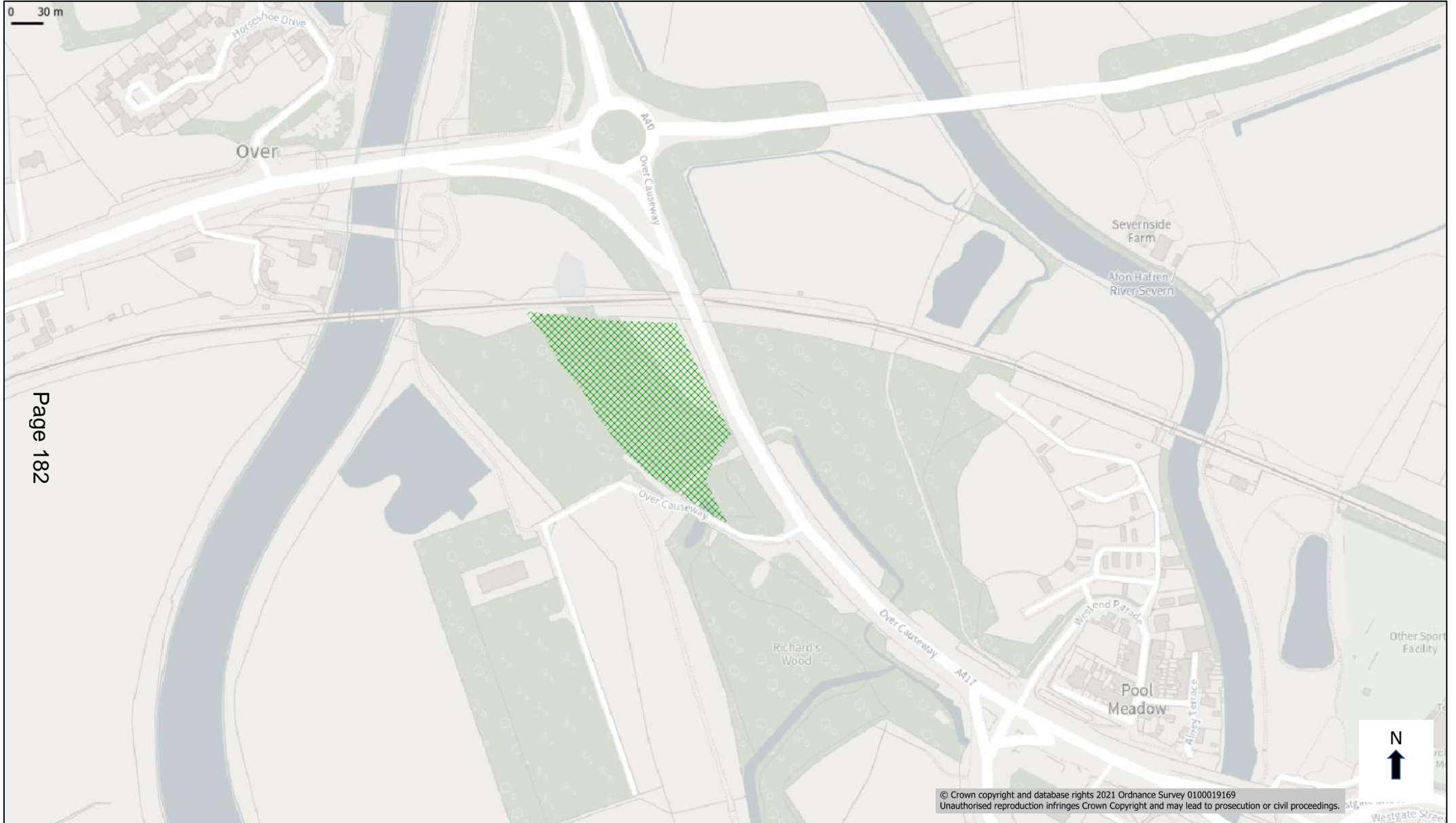




Local Wildlife Site. Osier Ponds / Osier Beds, Alney Island, 0.33 ha section. Added.

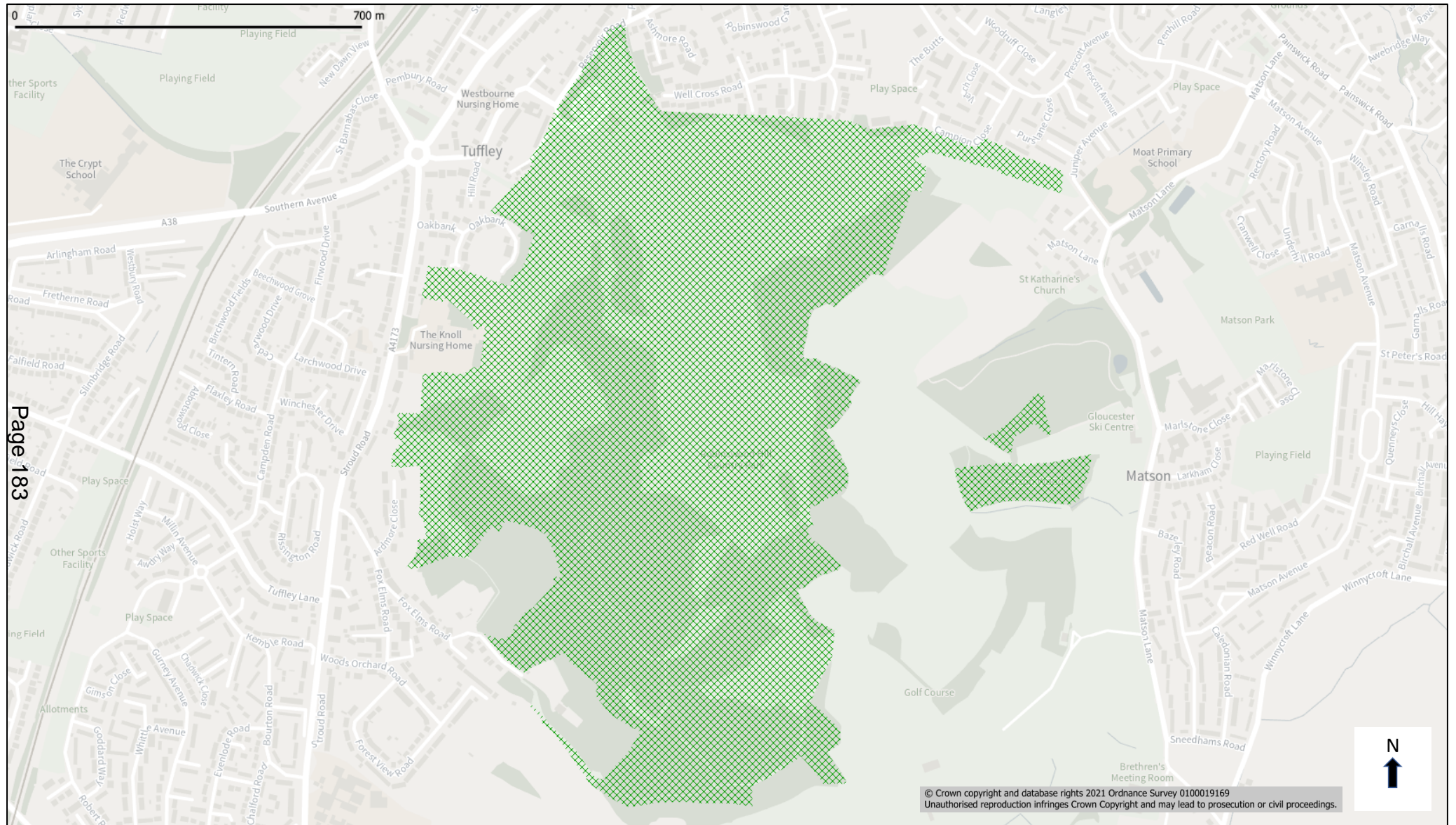


Local Wildlife Site. Osier Ponds / Osier Beds, Alney Island, 1.6 ha section. Added.

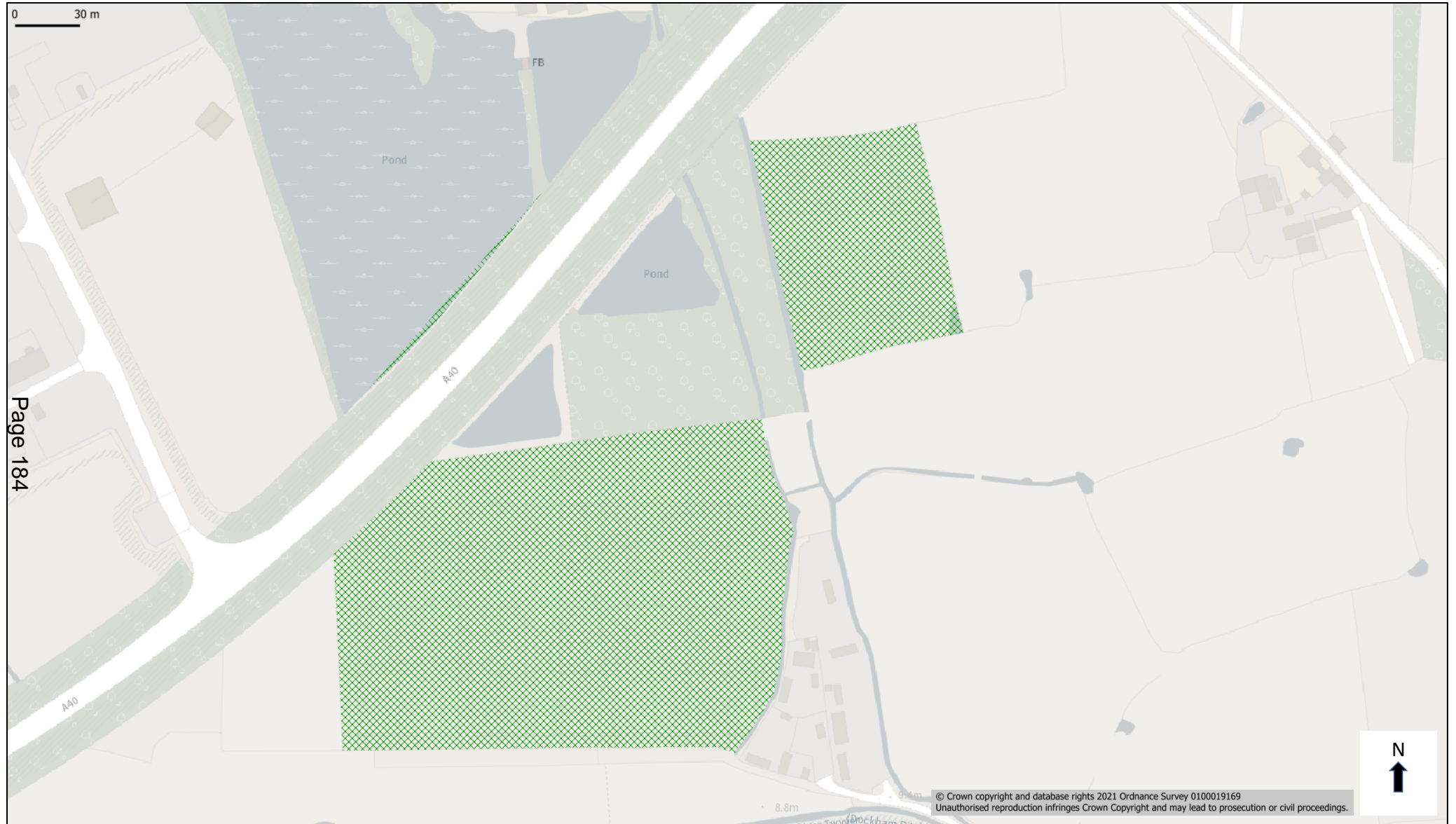




Local Wildlife Site. Robinswood Hill. Added.



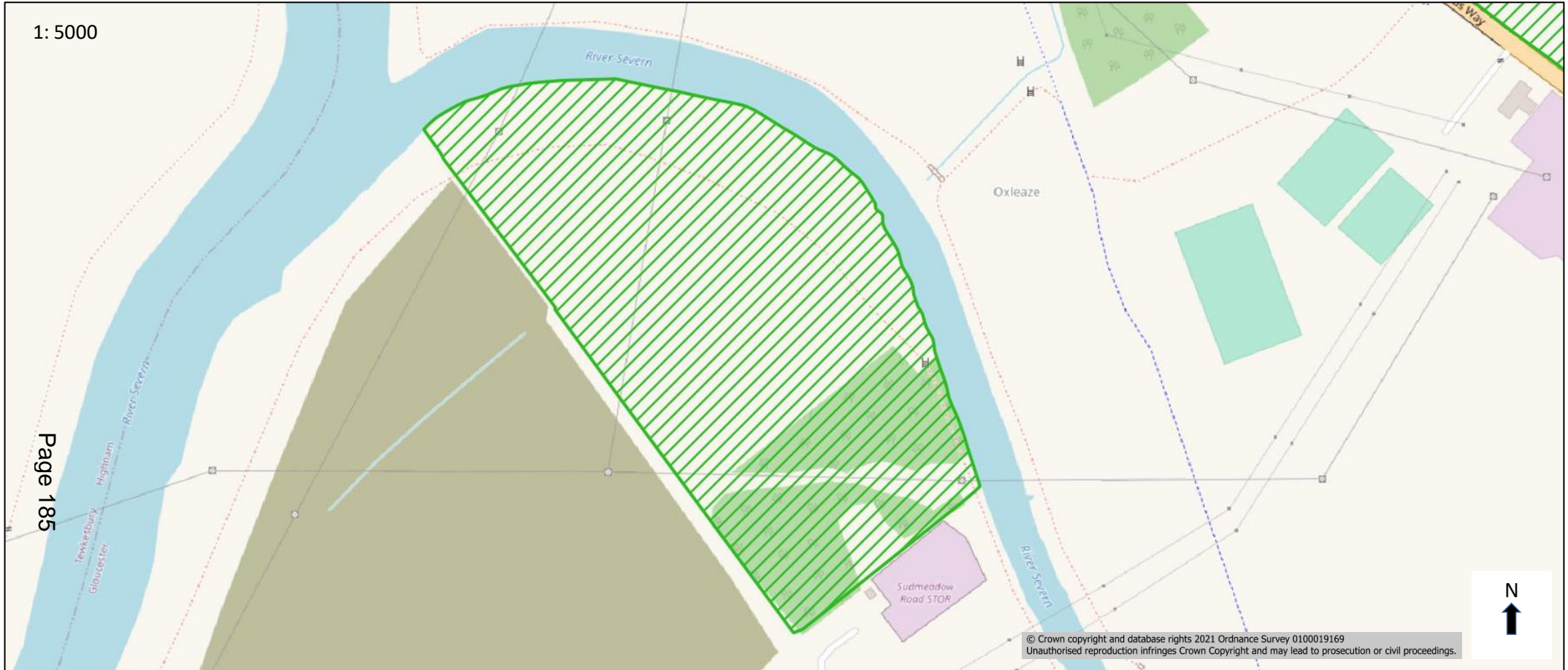
Local Wildlife Site. Sandhurst Lane Meadows. Added.



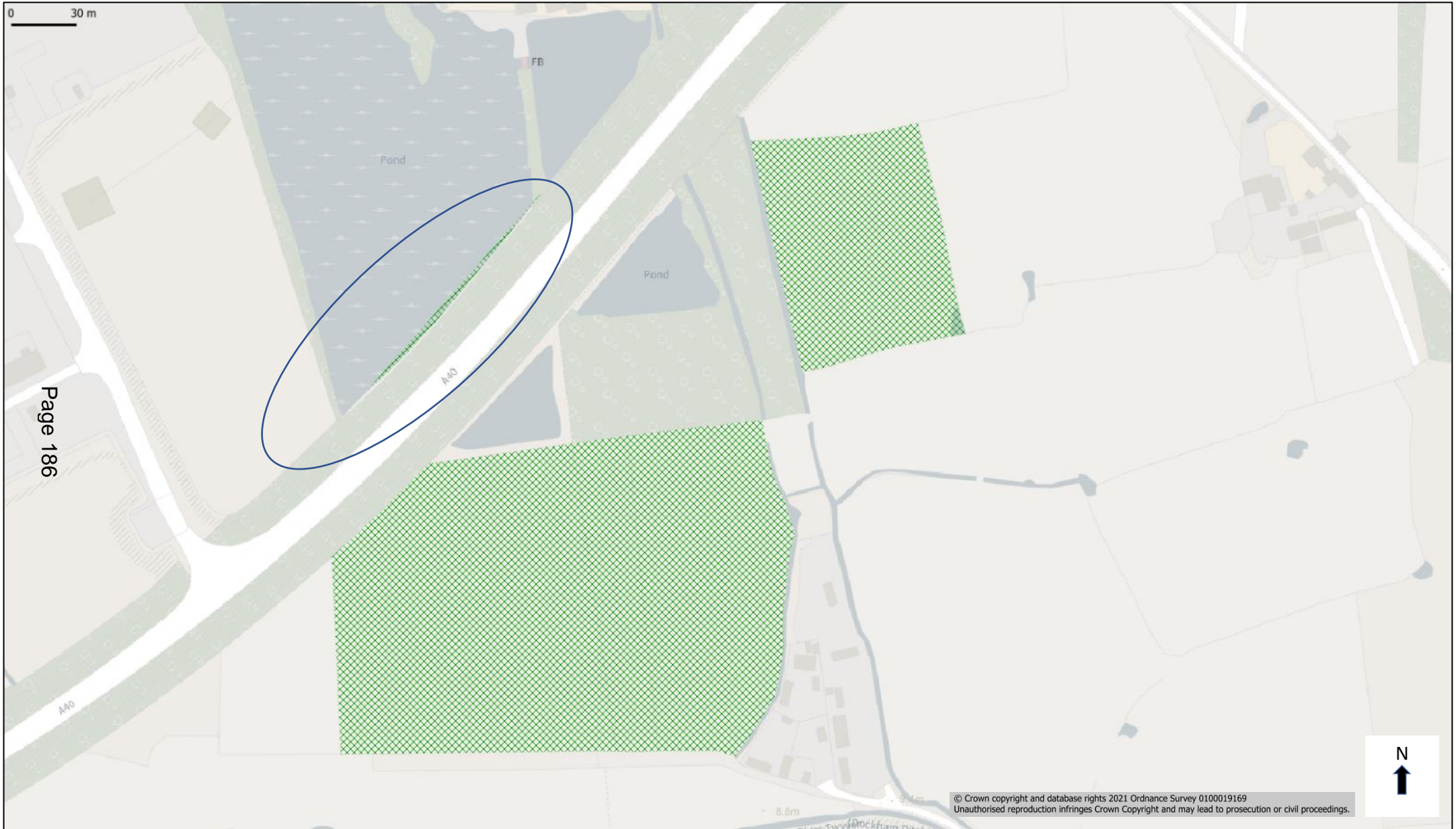


Local Wildlife Site. Sud Meadow. Added

1: 5000

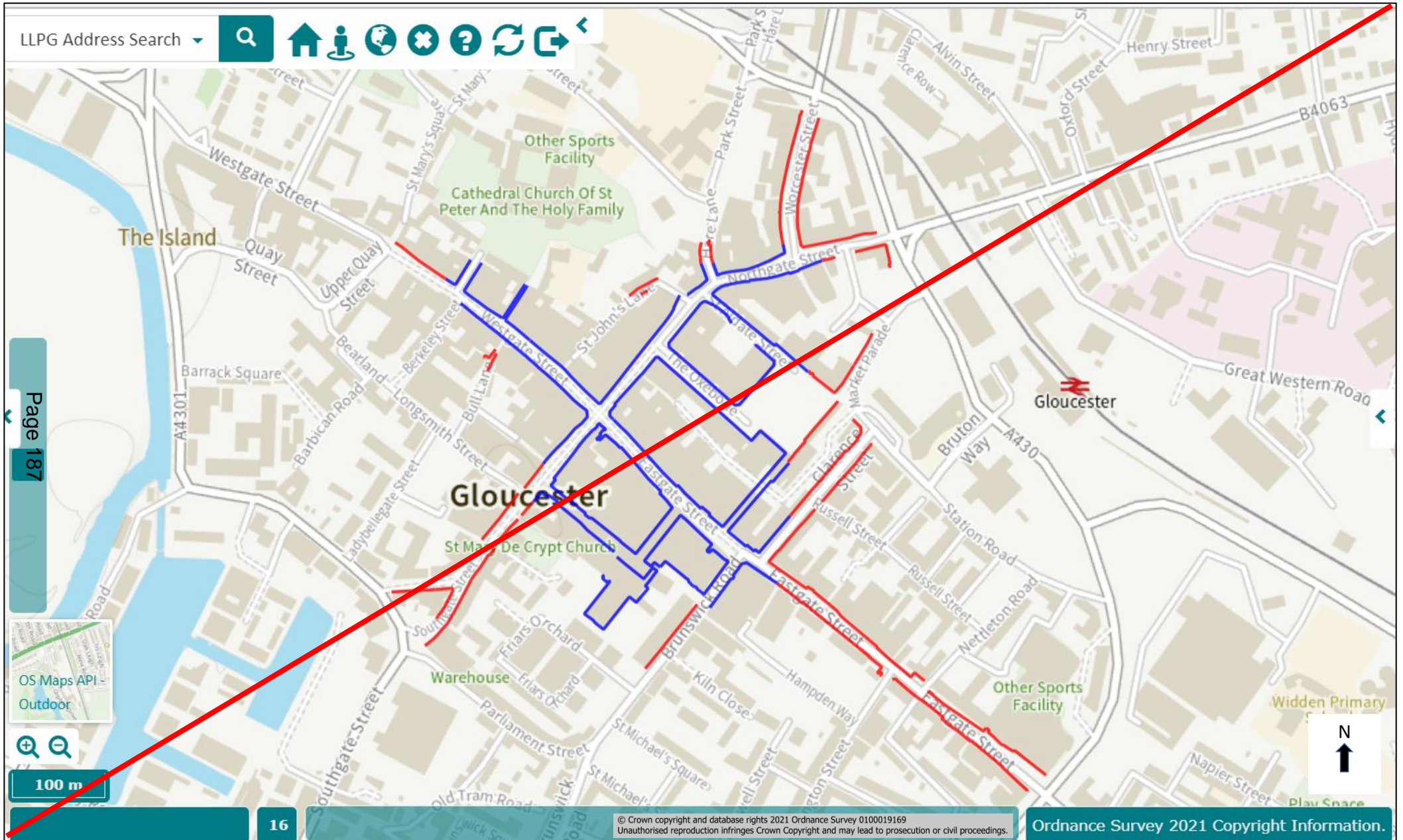


Local Wildlife Site. Walham Ponds (small part in Gloucester's administrative boundary). Added.



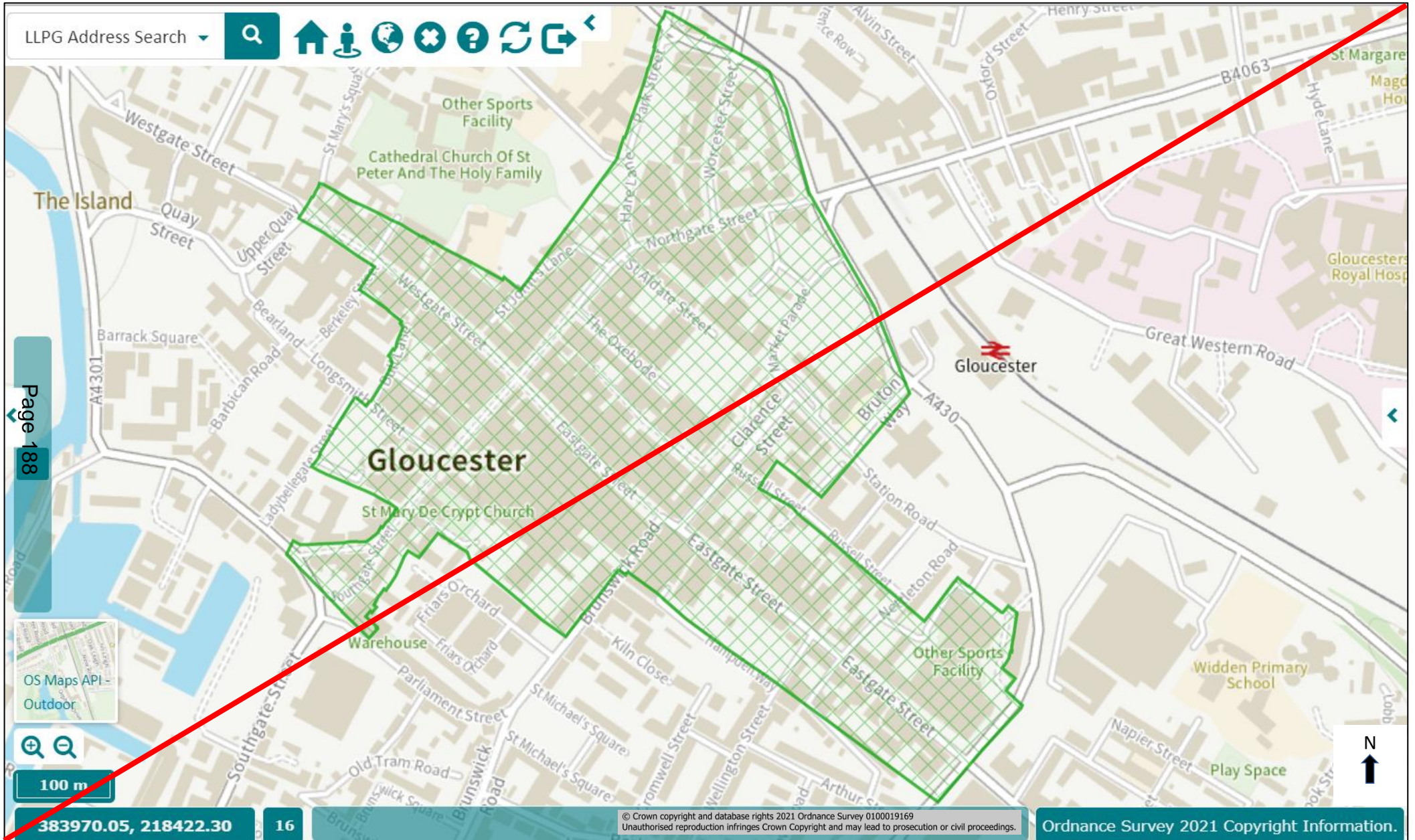


Primary and Secondary Shop Frontages: Deleted. In JCS.





Primary Shopping Area. Deleted. Covered by JCS.





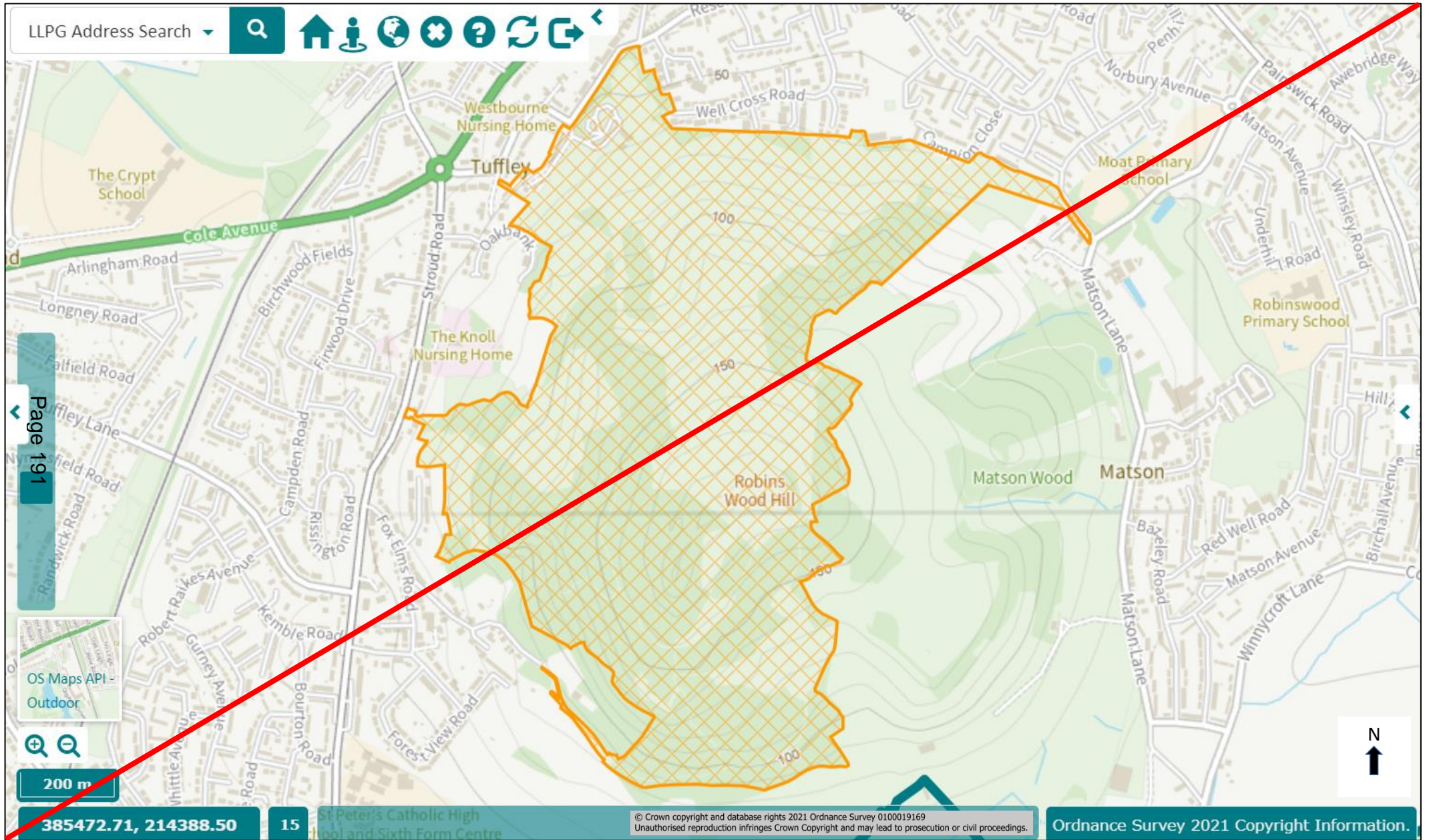
Protected Views Buildings. Amended.







Robinswood Hill Country Park. Deleted. Not spatially referenced as a country park in City Plan policy.



LLPG Address Search



Page 191

OS Maps API  
Outdoor

200 m

385472.71, 214388.50

15

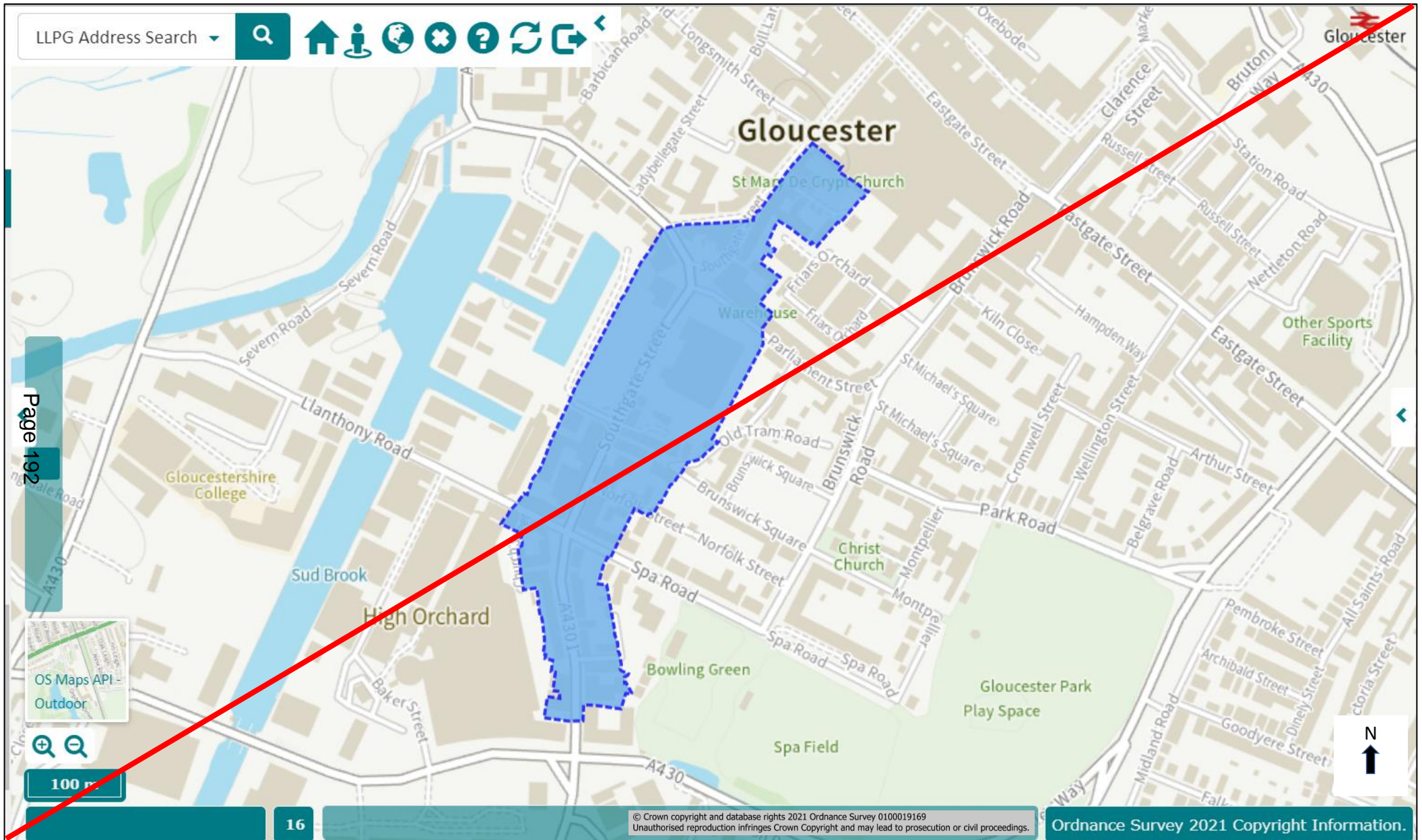
St Peter's Catholic High  
School and Sixth Form Centre

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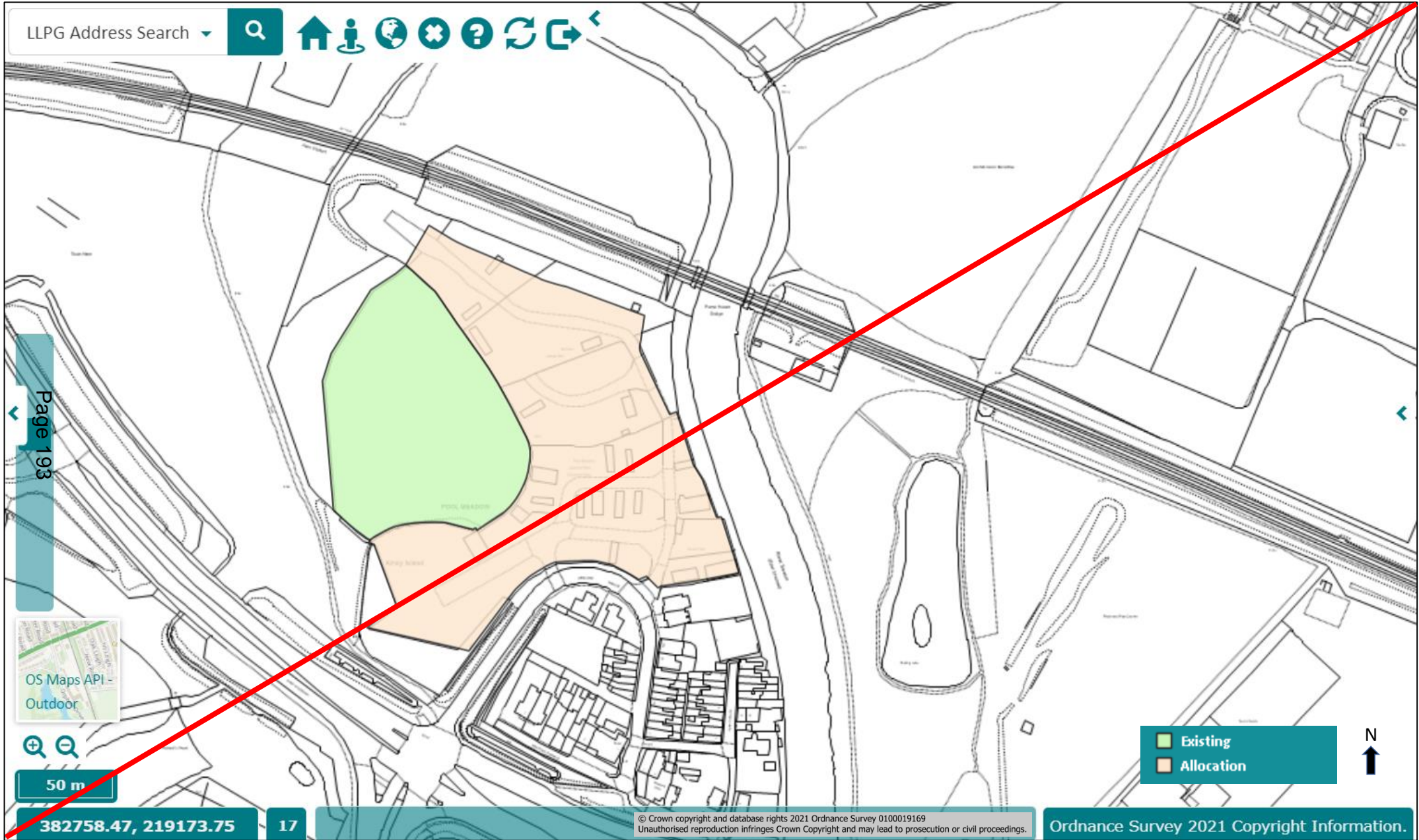


Southgate Street Townscape Heritage Initiative (THI). Deleted. No geographical reference in City Plan policy.








Travelling Show People's Sites. Deleted. No geographical reference in City Plan policy.



Winneycroft Strategic Allocation. Deleted. In JCS.



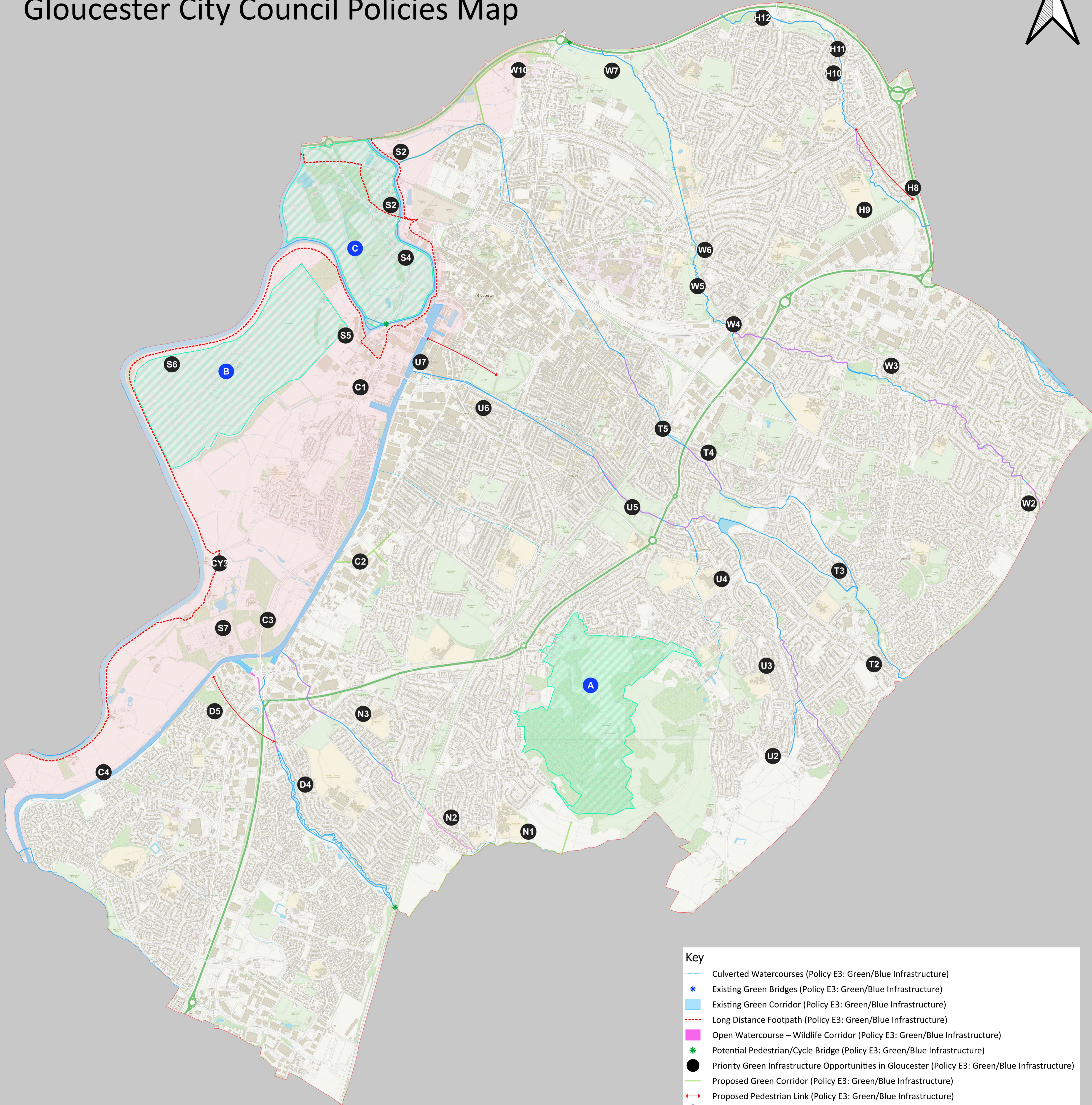
City Plan Submission Version Policy E5 made reference to the JCS Green Infrastructure Strategy which contained spatial representations of sites and opportunities in Gloucester City. Through the GCP examination it was considered necessary to include these opportunities on the GCP Policies Map. The following have been added:

-  Culverted Watercourses (Policy E3: Green/Blue Infrastructure)
-  Existing Green Bridges (Policy E3: Green/Blue Infrastructure)
-  Existing Green Corridor (Policy E3: Green/Blue Infrastructure)
-  Long Distance Footpath (Policy E3: Green/Blue Infrastructure)
-  Open Watercourse – Wildlife Corridor (Policy E3: Green/Blue Infrastructure)
-  Potential Pedestrian/Cycle Bridge (Policy E3: Green/Blue Infrastructure)
-  Priority Green Infrastructure Opportunities in Gloucester (Policy E3: Green/Blue Infrastructure)
-  Proposed Green Corridor (Policy E3: Green/Blue Infrastructure)
-  Proposed Pedestrian Link (Policy E3: Green/Blue Infrastructure)
-  Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
-  Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
-  Sub Regional Green Infrastructure Potential Regional Park (Policy E3: Green/Blue Infrastructure)
-  Watercourse (Policy E3: Green/Blue Infrastructure)

See the Addendum: Green/Blue Infrastructure Additions which is a zoomable pdf showing these features.



# Gloucester City Council Policies Map



Key	
	Culverted Watercourses (Policy E3: Green/Blue Infrastructure)
	Existing Green Bridges (Policy E3: Green/Blue Infrastructure)
	Existing Green Corridor (Policy E3: Green/Blue Infrastructure)
	Long Distance Footpath (Policy E3: Green/Blue Infrastructure)
	Open Watercourse – Wildlife Corridor (Policy E3: Green/Blue Infrastructure)
	Potential Pedestrian/Cycle Bridge (Policy E3: Green/Blue Infrastructure)
	Priority Green Infrastructure Opportunities in Gloucester (Policy E3: Green/Blue Infrastructure)
	Proposed Green Corridor (Policy E3: Green/Blue Infrastructure)
	Proposed Pedestrian Link (Policy E3: Green/Blue Infrastructure)
	Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
	Strategic Green Infrastructure Areas (Policy E3: Green/Blue Infrastructure)
	Sub Regional Green Infrastructure Potential Regional Park (Policy E3: Green/Blue Infrastructure)
	Watercourse (Policy E3: Green/Blue Infrastructure)





**GLOUCESTER CITY PLAN  
2016-2031  
Main Modifications**

**SUSTAINABILITY APPRAISAL (SA)**

**(Integrating Strategic Environmental  
Assessment, Health Impact Assessment,  
Equality Impact Assessment, Habitats  
Regulations Assessment)**

**SA Addendum Report  
April 2022**

# Gloucester City Council

## Gloucester City Plan (2016-2031): Main Modifications

### SUSTAINABILITY APPRAISAL (SA): Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA); Habitats Regulations Assessment (HRA)

### Sustainability Appraisal Addendum Report April 2022

<i>date:</i>	December 2021 Draft v01 December 2021 Draft v02 April 2022 Final Draft v03	
<i>prepared for:</i>	Gloucester City Council	
<i>prepared by:</i>	Barbara Carroll	Enfusion
<i>quality assurance:</i>	Barbara Carroll	Enfusion

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## 1.0 INTRODUCTION

### The Gloucester City Plan (GCP): Submission & Examination

- 1.1 The Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) (plan period 2011 to 2031) sets out the housing and employment needs for the Gloucester City area, including the strategic direction for development growth and strategic policies. GCC is preparing a 'Part 2' Local Plan that covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance sitting underneath the higher-level JCS and national planning guidance.
- 1.2 The GCT JCS<sup>1</sup> (adopted December 2017) identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary. The GCT JCS therefore identifies strategic allocations around Gloucester to meet the residual need. Strategic allocations in the GCT JCS are at Policy A1 Innsworth and Twigworth, Policy A2 South Churchdown, Policy A3 North Brockworth, and Policy A6 Winnycroft.
- 1.3 The GCP allocates non-strategic sites and local policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031. The GCP has been prepared in accordance with national planning requirements and iteratively informed through continuing technical studies, as well as wide consultation with the public, stakeholders, and the regulators. The proposed draft GCP was submitted to the Secretary of State for independent examination by a Planning Inspector on 18th November 2020. Hearing sessions were held virtually between 11 May and 9 June 2021.
- 1.4 The Inspector advised in her Post Hearings Letter [EXAM25] (19 August 2021)<sup>2</sup> that she considered that the draft GCP could be made sound through Main Modifications. The Inspector also confirmed that the proposed MMs should be subject to further Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) as necessary; these addendum reports should be published as part of the MM consultation. The MMs will be subject to public consultation and the Inspector's final conclusions will be reached taking into account any representations, including on the SA and HRA.

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<sup>1</sup> <https://www.jointcorestrategy.org/>

<sup>2</sup> <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan-examination-library/>

## **Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA)**

- 1.5 The emerging elements of the draft Gloucester City Plan have been tested through SA, integrating requirements for Strategic Environmental Assessment (SEA), Health & Equality Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA). Each draft of the GCP has been accompanied by SA and HRA Reports through the various consultation stages of plan-making. Representations to the SA and HRA reports have been taken into consideration in the following iteration of assessments and plan-making, as appropriate and relevant.
- 1.6 The SA and HRA studies have been undertaken by independent specialists, Enfusion Ltd. The SA/SEA [CD005] and HRA [CD006] reports<sup>3</sup> were submitted as evidence supporting the Local Plan. The Inspector raised certain Matters, Issues & Questions prior to the hearing sessions and these included queries regarding the SA/SEA, EqIA & HRA for Matter 1 Legal Compliance, SA & Duty to Cooperate. The Council prepared a written statement that responded to queries relating to these assessments. The SA/SEA and HRA reports were discussed during the hearing session for Matter 1 on 11 May 2021.
- 1.7 Representations and written statements to Matter 1 of the hearing sessions were provided by three organisations in addition to Gloucester City Council. There were no representations from the environmental regulators/statutory environmental consultation bodies. Of the 3 respondents, only one (an agent acting for developers/land owners) raised concern about the SA/SEA, in particular for the site known as Land east of Winnycroft Lane. The respondent asserted that the SA does not consider the potential to mitigate constraints in all sites considered unsuitable through the Strategic Assessment of Land Availability (SALA).
- 1.8 All sites tested by the SA and proposed in the Plan as allocations had been assessed through the SALA process. In terms of the SALA's assessment of heritage constraints on sites the Council has made its position clear [EXAM 21 GCC Note Heritage Assessments]. In her post hearings letter [EXAM 25], the Inspector did not raise any concerns about the selection of site allocations, their sifting through the SALA process or their assessment through the SA. It may be noted that the site known as Land east of Winnycroft Lane was not considered by the Council to be a reasonable alternative through the SALA and on advice from the Heritage team and Historic England. Therefore, it was not considered further through the SA process.
- 1.9 The Inspector did not raise any concerns regarding the SA/SEA and HRA in her Post Hearings Letter [EXAM25]. She advised that the requirements for SA/SEA and HRA should be met by producing addendum reports as necessary and that these should be subject to consultation with the MMs. The Inspector has also requested that the Council undertake an SA of the site Land east of Winnycroft Lane (SALA Ref: 06NEW17) and that this should be included in the updated SA to accompany the Main Modifications to the GCP on public consultation.

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<sup>3</sup> <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan-examination-library/>

## **Purpose & Methods for the SA & HRA Addendum Report**

- 1.10 This SA Addendum constitutes part of the SA/SEA Report submitted [CD005] - for the purposes of demonstrating compliance with SA and SEA requirements. It also addresses updating of the HRA [CD006] Report. This Addendum Report only addresses the implications for the assessments with regard to the potential MMs; it does not reconsider any other aspects of the Plan. Thus, the purpose of the SA Addendum is to assess those proposed MMs that are likely to have significant effects and to demonstrate that the requirements for SA, SEA and HRA have been met.
- 1.11 A pragmatic and proportionate approach has been taken to the assessments. The MMs have been screened using professional judgment to assess their likely significance with regard to SA/SEA and HRA. Those MMs that were considered to be significant have been further assessed using the same method and SA Framework of Objectives (Table 2.1 CD005) and the implications for the previous findings considered. Any MMs that are relevant to the previous HRA findings have also been considered and the HRA updated within this SA Addendum Report.
- 1.12 In order to meet with the Inspector's request, the site Land east of Winnycroft Lane has been subjected to SA in a consistent and comparable manner as far as possible to the other development site options. The SA was undertaken using the same SA framework of objectives and available evidence – the findings are presented in the appendix to this Addendum Report and summary discussion provided in section 4.



## 2.0 SCREENING THE MAIN MODIFICATIONS (MMs) FOR SA & HRA SIGNIFICANCE

2.1 The Inspector has suggested Main Modifications that she considers could make the draft GCP sound. The MMs [EXAM xx] were screened for their significance with regard to SA, SEA and HRA, as set out in the following Table 2.1. It may be noted that some proposed modifications are to provide greater clarity, correct errors, avoid repetition, for consistency, and for updating (for example, with national policy changes), and as such may not be significant for the findings of the assessment processes and are not included in this summary table.

**Table 2.1: Screening the MMs for SA & HRA Significance**

MM No.	GCP Policy/ Paragraph	Summary of Changes	Significant for SA/SEA or HRA?
MM1 MM2 MM3	Relationship with JCS	Additional text for clarification & updating	No
MM4	Para 2.16	Wording strengthened in relation to efficient use of resources, waste reduction, and greater use of sustainable transport	No
MM5	Vision	Additional wording " <i>and building resilience and adaptability to...</i> (climate change)"	Yes
	Key Principle 1	Additional wording "..." <i>low carbon city, which is resilient and adaptable to a changing climate, brings regeneration benefits, promotes sustainable development, incorporating measures to reduce waste, and makes the most efficient use of brownfield land and the reuse of vacant and underused buildings and space.</i> "	Yes
MM6 MM7 MM8 MM9	Development needs & Strategy	Additional words for updating & clarification, including updating of housing figures with shortfall updated from 900 to 1,042 dwellings.	No
		Additional text relating to employment land & including updating of allocation from 14.6 to 8.1 hectares.	No
		Additional text providing clarification & further information regarding gypsy & traveller communities and windfall development.	No
MM10 MM11 MM12	Housing	Additional text providing clarification & further information; updating of housing trajectory	No
MM13	A1 effective & efficient use of land & buildings	Additional text for clarification. Additional clause 7 - <i>Be well-designed to create and support healthy living conditions</i>	Yes
MM14	New Policy – Houses in	New policy	Yes

	Multiple Occupation		
MM15	A2 Affordable Housing	Policy & supporting text deleted & consequential amendment to Policy A5 – see MM11	
MM16	A4 Student Accommodation	Minor additions for clarification	No
MM17	A5 Specialist Housing	Additional text for clarification & further information. Criterion 4 – additional text - <i>Will not lead to harm through over concentration in the local area, including but not limited to:</i> <ul style="list-style-type: none"> <li>a. <i>Levels of activity that cause excessive noise and disturbance to local residents</i></li> <li>b. <i>Excessive demand on social infrastructure, such as health and social care and police services</i></li> <li>c. <i>Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.</i></li> </ul>	Yes
MM18	A6 Accessible & Adaptable Homes	Change from 50 to 25%; additional text - <i>4% of affordable homes should be wheelchair accessible to meet identified need on the City Council's Housing Register. Provision shall comprise of affordable rented homes to which the City Council will allocate households to;</i> and explanation regarding exceptions.	No
MM19	A7 Self-build & custom-build	Minor additions for clarification	No
MM20	Employment Development	Additional text for clarification & further information relating to the JCS & the GCP & employment land	No
MM21	B1 Employment & skills	Amendments & additional text for clarification & further information	No
MM22	B2 safeguarding employment	Amendments & additional text for clarification & further information	No
MM23	B3 New employment development	Amendments & additional text for clarification & further information & new criterion - <i>Provision is made for the delivery of efficient and effective commercial waste collection services.</i>	No
MM24	B4 development Gloucester Docks	Criterion 2 rewritten - <i>Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution</i>	Yes

		<i>to its character and distinctiveness</i> & new criterion 5 re existing businesses.	
MM26	B6 Public Houses	Additional text to provide further guidance re marketing & sale; new supporting text explaining re needs of local community.	No
MM27	C1 Active design & accessibility	Additional wording - <i>meet the highest possible standards of accessible and inclusive design</i> and new criterion 3 <i>The development will support healthy active lifestyles by facilitating participation in physical activity by incorporating the following active by design principles</i> with clauses a-g providing details	Yes
MM28	C3 public open space	Amendments for clarification; additional criterion - <i>For public open spaces, an assessment demonstrates the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide</i>	No
MM29	C4 Hot Food takeaways	Amendments for clarification	No
MM31	C6 Cordon Sanitaire	New text - <i>Planning permission will be granted for development within the Cordon Sanitaire, as shown on the policies map, where it can be clearly demonstrated through a robust odour assessment that: 1. The users/occupants of the proposed development will not be adversely affected by odour nuisance; and 2. The introduction of the proposed use will not adversely affect the continued operation of the Netheridge Sewage Treatment Works.</i>  Provides more explanation – overall no significant effects for SA findings.  Additional supporting text for further information & including details on waste management; guidance for odour assessments, & acknowledgement re no prejudice of NSTW's operations.	No
MM32	C8 changing Places toilets	Amendments & additional text for clarification	No
MM33	D1 Historic Environment	Rewording – <i>“preservation <del>ment</del> sustaining or enhancing of its significance”</i> Additional text - <i>Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification</i>	Yes
MM34	D2 Non-designated historic	Amended wording - <i>Development affecting a non-designated heritage asset, or its setting, should protect and where</i>	Yes



		<i>appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered</i>	
MM35	D4 shopfronts	Amendments & additional text for clarification & further information	No
MM36	Natural environment – Introduction	New paragraph explaining that part of the GCP lies within the SW Marine Plan area – for further information	No
MM37	E1 Landscape	Delete policy as this issue is covered by the JCS	No
MM38	E2 Biodiversity Geodiversity	Amendments for updating	No
MM39	E3 Nature Recovery	Amendments for updating	No
MM40	E4 Trees	Minor additions for clarification; additional text - <i>All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would be inappropriate</i> New supporting text relating to maintenance, protection of veteran trees, & protection of wild birds	Yes
MM41	E5 Green/Blue infrastructure	Additional wording to include supporting text details for blue infrastructure & further information	Yes
MM42	E6 Flooding	Additional wording for clarification - <i>opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.</i> New supporting text on early flood risk assessment, and upstream natural flood management.	Yes
MM43	E7 Renewable energy R Severn & Canal	Additional text advising re need to consider the SW Marine Plan	No
MM44	E8 Cotswold Beechwoods SAC	Reference to external studies, guidance or policy documents from policy text	No
MM45	F1 Materials	Additional text for clarification	No
MM46	F2 Landscape & Planting	Amendments & additional text for clarification & further information	No
MM47	F3 community safety	Additional wording " <i>and cycle routes</i> " Additional supporting text for further information	No
MM48	F5 open plan estates	Amendments for clarification	No

MM49	F6 space standards	Amendments for clarification	No
MM50	Sustainable living, transport & infrastructure – Introduction	New paragraphs on climate change, requirements for Energy & Waste Minimisation Statements, and energy efficiencies	No
MM51	G1 sustainable transport	New policy text on requirements for parking of private vehicles & provision of cycle parking New supporting text on cycle parking design & car parking	Yes
MM52	G2 Charging for EVs	Amendments for clarification <sup>4</sup>	No
MM53	G3 Cycling	Additional text - <i>All developments must provide safe and secure access by cycle</i>	Yes
MM54	G4 Walking	Change from "should" to "must"	Yes
MM55	G6 Telecommunications	Amendments & additional text for clarification & further information	No
MM56	G8 Review	Priority to delivery of affordable homes over other policy requirements deleted	No
MM57	Site allocations	SA03 Former Prospect House, increase residential capacity to 60 dwellings. SA04 Former Wessex House, increase residential capacity to 40 dwellings. SA05 Land at Great Western sidings, increase residential capacity to 300 dwellings. SA18 Jordan's House, reduce residential capacity to 10 dwellings.	Yes
MM64 MM65	Site allocations	Delete SA08: King's Quarter. Delete SA12 Land at Rea Lane, Hempsted.	Yes
MM66 MM67	Site allocations – employment	Delete SA07: Lynton Fields, Land east of Waterwells Business Park. Delete SA22: land adjacent to Secunda Way	Yes
MM68 to MM76	Site allocations - MCAs	Include refs to MCAs in site allocations where relevant	No
MM76	MCAs & contamination	Include refs for one site	No
MM77 to MM80	MCAs & mitigation	Include refs for mitigation for 3 sites	No
MM81	SA03 67-69 London Rd	Amend red line boundary & requirements relating to biodiversity	Yes
MM82	SA09 Blackfriars	Amend regarding engagement with EA re flood improvements	Yes

<sup>4</sup> Please note that following the publication of new building regulations, this policy is considered redundant and is proposed for deletion through the Main Modifications. See EXAM26 and EXAM26A for further information.

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MM83	SA10 car park	Replace mixed use with main town centre uses	No
MM84	SA11 Rear of Retail Park	Amend regarding ground & surface water quality Additional information – overall not significant for the SA	No
MM85	SA15 S of Winnycroft	Amend as per flood mitigation Additional information – overall not significant for the SA	No
MM86	SA16 Lwr Eastgate St	Delete requirement for green roofs Overall, not significant for the SA	No
MM87	SA21 Part of West Quay	Amendment for clarification re redevelopment scheme	No
MM89 & MM90	Relationship with other plans	Amendments for clarification	No
MM88 MM91 & MM92		Amendments & updating	No
	Policies Map	Amendments & updating	No



### 3.0 SA OF MAIN MODIFICATIONS (MMs)

- 3.1 **Vision & Key Principle 1:** The additional wording “*and building resilience and adaptability to... (climate change)*” to the Vision for the GCP strengthens by providing explicit commitment to planning for climate change. The additional wording to Key Principle 1 ...” *low carbon city, which is resilient and adaptable to a changing climate, brings regeneration benefits, promotes sustainable development, incorporating measures to reduce waste, and makes the most efficient use of brownfield land and the reuse of vacant and underused buildings and space.*” clarifies and also makes explicit the development principles for low carbon and waste. The SA had found no significant incompatibilities between the GCP Vision & Key Principles, with the exception of objectives for waste. The SA had noted the complex inter-relationships between these Principles and the SA Objectives. The SA had recommended that waste should be included, and this has now been progressed with positive effects for overall sustainable development principles.
- 3.2 **Development Strategy:** Additional text relating to employment land and including updating of employment allocations from 14.6 to 8.1 hectares as a result of sites no longer being available or gaining planning permission.
- 3.3 **Policy A1 Effective and efficient use of land and buildings:** Additional text for clarification and an additional clause 7 “*Be well-designed to create and support healthy living conditions*”. The additional clause making explicit the requirement for creating and supporting healthy living conditions will strengthen the positive effects found by the SA and particularly with regard to SA Objective No 17 Improve Health & Wellbeing.
- 3.4 **Policy A2 Houses in Multiple Occupation:** New policy recognising that houses in multiple occupation (HMOs) that were originally intended for a single household and have since been converted into a large HMO require planning permission. Whilst HMOs can provide a valuable housing option for many people with likely positive effects for SA Objective No 18 Housing, high concentrations of HMOs can have negative effects on the character of the area and the amenities enjoyed by existing residents – SA No 8 Landscape, No 9 Townscape, and No 14 Access to Services/Facilities. The new policy aims to ensure an appropriate balance with a suitable housing mix and to limit the numbers of HMOs in locations. This approach provides mitigation measures for potential negative effects on character and amenities for existing residents.
- 3.5 **Policy A5 Specialist Housing:** Additional text for clarification and further information. Criterion 4 has additional text – “*Will not lead to harm through over concentration in the local area, including but not limited to: Levels of activity that cause excessive noise and disturbance to local residents; Excessive demand on social infrastructure, such as health and social care and police services; Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.*” This provides further explanation and guidance for a specific category of housing that will contribute to mitigating any likely negative effects for SA No

11 Noise & Light Pollution, No 17 Health Facilities, and No 18 Housing. This additional clarification will help better guide developers but is unlikely to affect the previous findings of the SA for neutral or positive effects.

- 3.5 **Policy B3 New employment development:** Amendments and additional text for clarification with further information and a new criterion – *“Provision is made for the delivery of efficient and effective commercial waste collection services.”* This makes explicit the requirement for commercial waste management and will support SA objectives for sustainable waste. However, it is not significant with regard to the previous SA findings.
- 3.6 **Policy B4 Development at Gloucester Docks:** Criterion 2 rewritten – *“Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness”* with new criterion 5 requiring that new development would not affect the functioning of existing businesses. The rewriting of criterion 2 and the provision of a new criterion 5 provide clarification but are not significant with regard to the previous SA findings.
- 3.7 **C1 Active design & accessibility:** Additional wording – *“meet the highest possible standards of accessible and inclusive design”* and new criterion 3 *“The development will support healthy active lifestyles by facilitating participation in physical activity by incorporating the following active by design principles”* with clauses a-g providing comprehensive details on connected communities; connected walking, running and cycling routes; co-location of community facilities; network of multifunctional open space; high quality streets and spaces; legible places; and appropriate infrastructure.
- 3.7 The submitted SA Report (section 5 & 6 EXAM005) had found minor positive effects for the plan including Policy C1 to accessibility/sustainable transport (SA No 6) and health/equality (SA Nos 16, 17, 19, 20, 21 & 22) objectives. The additional wording for *“highest possible standards for accessible and inclusive design”* strengthens the policy requirements indicating the likelihood of more positive effects being implemented. The new criterion No 3 provides comprehensive detailed guidance to developers and their agents – particularly explaining the interconnectedness and multifunctionality of sustainable transport, open spaces and high-quality design for development. This strengthening of policy requirements with explicit consideration of connectivity and multifunctionality should strengthen the findings of the SA towards major positive effects for accessibility and health/equality objectives.
- 3.8 **D1 Historic Environment:** Additional text - *Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.”* **D2 Non-designated historic assets:** Amended wording – *“Development affecting a non-designated heritage asset, or its setting, should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered.”*

- 3.9 The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policies D1 & D2 (and JCS Policy SD9) to provide sufficient mitigation measures to ensure that development will not lead to any significant negative effects on the historic environment and cultural heritage. The additional text in Policy D1 makes explicit the great weight applied to designated heritage assets, and the further amendments to Policy D2 provides clarification. This further strengthening of Policies D1 & D2 makes clear the requirements from new development and confirms that such consideration for the historic environment will be implemented confirming effective mitigation measures and at least neutral or no significant negative effects on SA objectives (No 9).
- 3.10 **Policy E4 Trees, woodlands, and hedgerows:** Minor additions for clarification; and additional text – *“All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would be inappropriate”*. New supporting text relating to maintenance, protection of veteran trees, and protection of wild birds.
- 3.11 The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policy E4 will not lead to any significant negative effects on biodiversity (SA No 1). The new requirement that all new streets should be tree-lined is likely to contribute to positive effects for objectives on biodiversity (SA No 1); air quality and health – mental and physical (SA Nos 11, 17); and longer-term objectives for climate change (SA No 3).
- 3.12 **Policy E5 Green/Blue Infrastructure:** Additional wording to include supporting text details for blue infrastructure and provision of further information. The addition of “blue” makes explicit that green infrastructure should consider the water environment and its wider role in sustainability including flood management and biodiversity/ecosystem services. Making explicit the role of the water environment and the links between blue and green infrastructure will strengthen the policy with more positive effects and better ensuring no significant negative effects on the water environment and its multifunctionality.
- 3.13 **Policy E6 Flooding, sustainable drainage, and wastewater:** Additional wording for clarification – *“opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.”* New supporting text on early flood risk assessment, and upstream natural flood management.
- 3.14 The updating and additional wording for clarification enhances the policy requirement to consider natural flood management and the wider flood/water catchment. The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policy E6, and together with JCS Policy INF3, provided sufficient mitigation to ensure that there will be no significant negative effects on flood risk. The enhancement of the policy strengthens the effectiveness of the policy.

- 3.15 **G Sustainable Living, Transport, and Infrastructure:** Introductory and context section has new paragraphs on climate change, requirements for Energy and Waste Minimisation Statements, and energy efficiencies. This further explanation will help guide developers, particularly with regard to GCP Policies that relate to climate change and thus, contribute to their effectiveness and mitigation of significant negative effects on SA objective Nos 2 & 3.
- 3.16 **Policy G1 Sustainable Transport and Parking:** New policy text on requirements for parking of private vehicles, including the need to ensure adequate provision of spaces for charging plug-in and other ultra-low emissions vehicles, and provision of cycle parking. New supporting text on cycle parking design and car parking. The additional specific text on cycle requirements will contribute to sustainable transport objectives (SA No 6) and overall, contribute to climate change objectives (SA No 3) with positive effects.
- 3.167 **Policy G3 Cycling:** Additional text – “*All developments must provide safe and secure access by cycle*” reinforces the findings of the SA that this policy will have positive effects for sustainable transport objectives (SA No 6).
- 3.18 **Site Allocations:** Updating of Site Allocations to reflect the examination and discussions, also, to reflect those sites where planning permission has now been permitted and/or development has progressed. Initial SA of site options is detailed in Appendix IV and further discussed as options progressed to proposed allocations in sections 5 and 6 of the submitted SA Report [EXAM005].
- 3.19 **SA03 Former Prospect House 67-69 London Road:** Increase in residential capacity from 30 to 60 dwellings. The initial SA had found mostly positive or neutral effects with no significant negative effects. Site specific requirements include the need for an archaeological assessment, retention of trees, and use of green walls/roofs – thus providing mitigation measures for any potential effects on SA Nos 1 & 9. There appears no reason why the capacity should not be increased, and this will enhance the positive effects previously identified for SA objectives on housing and health (Nos 18 & 17), and the major positive effects found for SA objectives on city centre and inequalities (Nos 14 & 16). The requirements relating to biodiversity (MM55) have been amended and this will further confirm the effectiveness of such mitigation measures and ensuring some biodiversity gain.
- 3.20 **SA04 Former Wessex House, Great Western Road:** Increase in residential capacity from 20 to 40 dwellings. The initial SA had found mostly positive or neutral effects with only uncertain minor negative effects associated with SA objectives for sustainable transport (SA No 6). Site specific requirements include the need for improved pedestrian links, an archaeological assessment, and use of green walls/roofs – thus providing mitigation measures for any potential effects on SA Nos 1, 6 & 9. There appears no reason why the capacity should not be increased, and this will enhance the positive effects previously identified for SA objectives on housing and health (Nos 18 & 17).



- 3.21 **SA05 Land at Great Western Sidings:** Increase in residential capacity from 200 to 300 dwellings. The initial SA had found mostly positive or neutral effects with only uncertain minor negative effects associated with SA objectives for sustainable transport (SA No 6). Site specific requirements include the requirements for a new strategic cycle and footpath linking to the city centre, built heritage and archaeological assessment, public open space and facilities, and green corridor – thus providing mitigation measures for any potential effects on SA Nos 1, 6, 9, 20 & 25. There appears no reason why the capacity should not be increased, and this will enhance the major positive effects previously identified for SA objectives on housing and health (Nos 18 & 17).
- 3.22 **SA07 Lynton Fields, Land east of Waterwells Business Park:** This employment allocation has been removed as there is not a willing landowner.
- 3.23 **SA08 Kings Quarter:** This housing allocation has been removed as it now has planning permission. This is significant for the SA; it does not change the findings of the SA, but the delivery of such allocated housing confirms the outcomes with positive effects for provision of high-quality housing in the most sustainable places and with the effectiveness of mitigation measures implemented such that there are no significant residual negative effects.
- 3.24 **SA09 Former Quayside House, Blackfriars:** Amendments regarding engagement with the Environment Agency in relation to flood risk improvements along the River Severn as part of a wider regeneration scheme. This will strengthen mitigation measures with regard to effects on the water environment.
- 3.25 **SA12 Land at Rea Lane Hempsted:** This housing allocation has been removed as it now has planning permission.
- 3.26 **SA18 Jordan's House:** Reduction in residential capacity from 20 to 10. This reduces the potential minor negative effects on the townscape that had been identified by the initial SA and retains the positive effects for SA objectives on housing and health.
- 3.27 **SA22 Land adjacent to Secunda Way:** This allocation has been removed as it is not available.

### **Habitats Regulations Assessment**

- 3.28 Natural England and the Inspector advised at the hearings that they had no issues with the HRA and agreed with its conclusions that there would be no adverse effects on the integrity of protected sites. The Inspector did not raise any issues for the HRA in her post-hearings letter [EXAM25]. The SA has screened the MMs for significance and the changes to site allocations will not have any significant effects for the designated sites. Therefore, the previous findings of the HRA/AA remain relevant and valid - the Gloucester City Plan will not have adverse effects on the integrity of protected sites, alone or in combination.

## 4.0 SA OF ADDITIONAL SITE

- 4.1 The Inspector suggested to the Council that the site Land east of Winnycroft Lane should be subjected to SA. During early preparation of the draft GCP, this site (SALA ref: 06NEW17) was not considered a reasonable alternative due to concerns about negative effects on the nationally protected Scheduled Monument Sneedham's Green – a medieval moated site – and its setting in open countryside. Therefore, the site Land east of Winnycroft Lane has been assessed in a consistent and comparable manner to the other development site options (that were considered to be reasonable alternatives) as far as possible. The SA was undertaken using the same SA framework of objectives and available evidence.
- 4.2 The findings of the SA are presented in the Appendix 1 of this SA Report. Several positive effects were identified, including major positive effects for housing and inequalities SA objectives due to the size of the development proposed (approximately 100-140 dwellings) and the associated likely proportion (at least 20%) of affordable housing (subject to viability). Minor positive effects were found for SA objectives accessibility and availability of open/green space. Also, potential minor positive effects for biodiversity, water quality and flood risk – but with some uncertainty as the effectiveness of mitigation measures is unknown. There are Great Crested Newts in the moat, and the water environment is inter-related with open fields currently draining into the moat with a balanced hydrology. Neutral effects are likely for pollution/amenity objectives – including through other GCP and JCS policies – but some uncertainty as the moat and its archaeological assets may be sensitive to run-off. The site is only proposed for housing and thus, neutral effects for employment/economy SA objectives.
- 4.3 Minor negative effects were indicated due to the distance of the site from sustainable transport modes, distance from the city and other local centres, and its distance from existing health and educational facilities. Some concern had been expressed with regard to highways during previous consultation, such that in consideration of the size of development potential for minor negative effects on SA 6a but with some uncertainty as mitigation measures such as junction improvements may be effective. As with all the site options on greenfield, minor negative effects were found for soil quality as the soil resource will be permanently lost.
- 4.4 The SA found major negative effects for proposed development on the protected Scheduled Monument of Sneedham's Green and its setting. The effects on this nationally protected heritage asset had been raised at earlier iterations of plan-making and consultation representations. Accordingly, the Council had investigated further and both Historic England (the statutory body for the historic environment) and conservation/archaeology specialists consider that development on the site would cause harm to the significance of the monument by removing its rural setting.
- 4.5 Therefore, the findings of the SA indicate that the additional site Land East of Winnycroft Lane & North of Green Lane is not suitable for consideration as a

site allocation in the GCP due to likely major negative effects on the historic environment with uncertainty about the effectiveness of any mitigation possibilities. There are also some concerns about the effectiveness of mitigation measures for the minor negative effects found for biodiversity (nationally protected Great Crested Newts) and the sensitivity of the landscape.

## 5.0 SUMMARY & NEXT STEPS

- 5.1 The proposed draft Gloucester City Plan was submitted to the Secretary of State for independent examination on 18th November 2020. Hearing sessions were held virtually between 11 May and 9 June 2021. The Inspector advised in her Post Hearings Letter [EXAM25] (August 2021) that she considered the GCP to be a plan that could be found sound subject to Main Modifications (MMs). The Council prepared draft MMs and submitted these to the Inspector for comment during November 2021.
- 5.2 The implications of the MMs on the findings of the previous SA/SEA and HRA/AA have been investigated. The MMs were screened for their significance with regard to the assessment processes. It was noted that many amendments are for updating and to provide further clarity and as such are not significant for SA and HRA.
- 5.3 Those MMs identified as potentially significant for SA/SEA and HRA/AA were then considered using the same methods and assessors as for the submitted SA and HRA Reports. Many of the MMs were refinements that strengthened policies through making certain requirements explicit, for example, for blue infrastructure, provision of street trees, safe and secure access by cycle. Policies and supporting text were enhanced in particular with regard to consideration of climate change, thus updating the plan in the light of recent concern and commitments. It is appreciated that further updating of JCS Policies will address climate change at the strategic level where interactions and interrelationships may be more meaningfully considered.
- 5.4 Two housing site allocations have been removed as the sites have now received planning permission. Such implementation will confirm the positive effects identified by the SA for housing, community, and health objectives. Four housing site allocations have been increased in capacity – with increased positive effects for housing and community objectives – overall, the major positive effects for meeting identified housing need are thus maintained. It is considered that mitigation measures through policy requirements remain sufficient to ensure no significant residual adverse effects. Two employment allocations have been deleted since it was determined that the sites were unavailable and therefore not deliverable. Overall, the employment land is still met such that the findings of the SA are still valid.
- 5.5 Overall, the previous findings of the SA/SEA remain relevant and valid. The refinements strengthen the mitigation measures embedded in the policies and thus confirm that there will be no significant negative effects and that positive effects have been optimised. The previous findings of the HRA/AA remain relevant and valid - the GCP will not have adverse effects on the integrity of protected sites, alone or in combination.
- 5.6 The proposed MMs will be subject to public consultation commencing early in 2021, including this SA Addendum Report. The Inspector will consider any



representations made and then her final report will be likely published in Spring 2022. Upon adoption of the modified Plan, an SA Adoption Statement will also be prepared and published, in accordance with regulatory requirements.

- 5.7 The Inspector requested that the Council should undertake SA of an additional site – Land east of Winnycroft Lane. The site has been subject to SA in a consistent and comparable manner as far as possible using the same SA framework of objectives and published evidence. The SA findings are detailed in Appendix I. The site is in the red risk zone for Great Crested Newts a nationally protected species with uncertainty for effectiveness of mitigation measures. The site is greenfield but located within an area of medium landscape sensitivity<sup>5</sup> that was found to be not suitable for development. The site is also a sensitive historic landscape, and the possibilities for mitigation are uncertain such that at least minor negative effects for landscape.
- 5.8 The site contains the nationally protected Scheduled Monument of Sneedham's Green moated site. It survives well and is designated since the moat and island will contain remains of medieval structure and archaeological information. As an earthwork, this monument is visible and can be comprehended as a heritage asset and appreciated within its historic setting. The setting of moated sites consists of their rural location – most were supported by rich farmland, and it is that link with the countryside that provides a substantial part of the monument's significance. Therefore, likely major negative effects on the setting of the scheduled monument in its rural location.
- 5.9 Currently the surrounding to the moat is waterlogged grassland and the hydrology of the area is balanced. It is possible that this hydrological balance with waterlogged deposits in the moat have enabled preservation of archaeological remains. It is likely that with the level of proposed development and associated hard-standing and urban run-off, there will be some effects on the local hydrology that may result in physical harm to any below ground archaeological remains. Therefore, there is an element of uncertainty for the significance of negative physical effects arising from any changes to hydrology and effects on any archaeological remains in the moat deposits until site level assessments have been completed.
- 5.10 An SA has been undertaken of the site and found major negative effects for the historic environment. Mitigation measures would be difficult to resolve the negative impacts on the Scheduled Monument and its setting in the countryside - which is an integral part of its national designation. It is unlikely that Historic England would support any proposed development<sup>6</sup>.
- 5.11 Therefore, the findings of the SA indicate that the additional site Land East of Winnycroft Lane & North of Green Lane is not suitable for consideration as a

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<sup>5</sup><https://www.gloucester.gov.uk/media/1110/jcs-landscape-characterisation-assessment-and-sensitivity-analysis-september-2013.pdf>

<sup>6</sup> [HIS007/a] <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>

site allocation in the GCP due to likely major negative effects on the historic environment with uncertainty about the effectiveness of any mitigation possibilities.

## Appendix 1: SA of Additional Site

### SA Significance Key

Categories of Significance of Effects		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

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Site: Land East of Winnycroft Lane & North of Green Lane Size & Approx. Capacity: 7.9ha, number of dwellings - approximately 100-140 Site Ref: SALA 06NEW17																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & Local Centres	Inequalities	Health Facilities Access	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
SA Summary	?	?	+	-?	-	-	-	--?	0?	0	-	++	-?	++	+	-	?

**Sustainability Appraisal commentary:**

It is estimated that the site could deliver approximately 100-140 new dwellings with the potential for major long-term positive effects against SA Objective 18.

The site is located within one of the most deprived 10% nationally for the overall Index of Multiple Deprivation (IMD) – one of 12 such areas Lower Level Super Output Areas (LSOAs)<sup>7</sup> in Gloucestershire & therefore, new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16 – with at least 20% affordable housing indicated (subject to viability).

The site is not located within or in close proximity to any nationally designated biodiversity; however, it is located within the outer SSSI Impact Risk Zone with respect to the SSSI/Special Area of Conservation (SAC) of the Cotswold Beechwoods<sup>8</sup> and as such any new residential accommodation will require a Habitats Regulations Assessment (HRA) to consider recreational disturbance on the SAC. Great Crested Newts have been confirmed on the site (SALA) and these are legally protected species such that development must avoid disturbing them and their habitats. The site is in the red risk zone for Great Crested Newts as per the District License Newt Map for Gloucester. This means it is a '*highly suitable habitat – the most important areas for Great Crested Newts*'. Great Crested Newts are a European protected species. The animals and their eggs, breeding sites and resting places are protected by law. If their presence were confirmed on site a licence for development would have to be obtained from Natural England or an application could be made through the District Licensing scheme – therefore, uncertainty about the possibilities for effective mitigation options at this stage and minor negative effects indicated for SA Objective No 1 Biodiversity.

All new development must now provide for net gains in biodiversity (para 174 NPPF 2021)<sup>9</sup> and therefore, minor positive effects potentially indicated for SA Objective 1. However, concern whether such biodiversity gain could be achieved on-site, and concern about the presence of the legally protected newts in the moat and surroundings and the effectiveness of any mitigation measures. Therefore, overall, uncertainty of effects and their significance.

The site is not located in any source protection Safeguard Zones for surface or groundwater. It is understood that water from an open field drains into the moat and that the hydrology is balanced.

The site is located within Flood Zone 1<sup>10</sup> indicating that there is low risk of surfacewater flooding and therefore, potentially minor positive effects for SA Objective 5. However, the open fields and moat effectively act to absorb heavy rainfall and it is uncertain how this would be affected by intensively developed levels of housing, hard standing, and access roads.

<sup>7</sup> [https://www.gloucestershire.gov.uk/media/2094524/gloucestershire\\_deprivation\\_2019\\_v13.pdf](https://www.gloucestershire.gov.uk/media/2094524/gloucestershire_deprivation_2019_v13.pdf)

<sup>8</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>10</sup> <https://check-long-term-flood-risk.service.gov.uk/postcode>



There is a nationally protected moat (and see later SA No 9) located within the site and this water body may be interconnected in some way to other water bodies with regard to both quality and quantity such that any new development would need to further investigate the water environment, including potential impacts on archaeological remains – therefore some uncertainty for SA No 4 water quality.

Comments from the Highways since initial SAs of site options (SALA) have identified the need for an improved scheme at the Painswick Rd/Stroud junction in respect of other sites along Winnycroft Lane. Given the size of the proposed development (approx. 140 dwellings) and the potential for cumulative effects, it is considered that there is the potential for minor negative effects against SA Objective 6a (site access/highways) but with uncertainty until detailed transport studies and effectiveness of mitigation measures. The site is not located in close proximity to a designated AQMA. The site is located at the southern edge of the city with limited access to sustainable transport – the nearest bus stop is on Matson Avenue (approximately 800m from the centre of the site to the north) and thus somewhat distant from pedestrian street routes with a likely minor negative effect against SA Objective 6b.

The site is open agricultural land (unknown whether any best and most versatile agricultural land), and any loss of greenfield land is considered to have the potential for a minor negative effect against SA Objective 7 for loss of soils.

The site is greenfield and given the design standards and mitigation provided through the GCT JCS and draft GCP, it is generally considered that there is the potential for a minor positive effect against SA Objective 8 Landscape. However, negative effects are indicated in consideration of the level of development, its relationship with the rural area and taking into account the sensitivity of the historic landscape (see SA No 9 following). The JCS Landscape Sensitivity & Characterisation Assessment (2013)<sup>11</sup> identified the South Matson parcel G27 to be of medium sensitivity. The site is located within this G27 parcel of land, and medium landscape sensitivity was reported within the GCP Background Note: Land North of Green Farm (2019)<sup>12</sup>. The Gloucester Landscape Analysis of Potential Development Sites (2013)<sup>13</sup> found that the area of the G27 parcel in which the site is located, is not suitable for development. Therefore, overall, minor negative effects are likely with uncertainty for the effectiveness of any mitigation measures.

The site contains the nationally protected Scheduled Monument of Sneedham's Green Moated site<sup>14</sup> and the effectiveness of visual mitigation on the heritage setting is uncertain. This moated site survives well and is designated<sup>15</sup> since the moat and island will contain remains of medieval structure and archaeological information. As an earthwork this monument is visible and can be comprehended as a heritage asset and appreciated within its historic setting. The setting of moated sites consists of their rural location – most were supported by the rich farmland around them. That link to the countryside provides a substantial part of the monument's significance. Therefore, it is considered that there is the likelihood for a long-term major negative effect against SA Objective 9 Historic Environment.

<sup>11</sup> <https://www.gloucester.gov.uk/media/1110/jcs-landscape-characterisation-assessment-and-sensitivity-analysis-september-2013.pdf>

<sup>12</sup> <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>

<sup>13</sup> <https://www.gloucester.gov.uk/media/1109/gloucester-landscape-analysis-of-potential-development-sites.pdf>

<sup>14</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<sup>15</sup> <https://historicengland.org.uk/listing/the-list/list-entry/1019399?section=official-listing>

Currently the surrounding to the moat is waterlogged grassland and the hydrology of the area is balanced. It is possible that this hydrological balance with waterlogged deposits in the moat have enabled preservation of archaeological remains. It is likely that with the level of proposed development and associated hard-standing and urban run-off, there will be some effects on the local hydrology that may result in physical harm to any below ground archaeological remains. Therefore, there is an element of uncertainty for the significance of negative physical effects arising from any changes to hydrology and effects on any archaeological remains in the moat deposits until site level assessments have been completed. However, having considered consultation comments from Historic England<sup>16</sup>, the Council considers that mitigation measures would be difficult to resolve the negative impacts on the Scheduled Monument and its setting. Overall, with regard to SA Nos 8 & 9 Landscape & Historic Environment, the Council considers that the site would not be a suitable option for consideration as housing development because the site contains a Scheduled Monument – Sneedhams' Green moated site – of national importance with likely below ground archaeological remains and an important historical setting in a rural area. It is unlikely that Historic England would support any proposed development.

The site is greenfield and unlikely to be any issues for contamination or pollution – neutral effects for SA Objective 11. However, some concern about polluted run-off draining into the moat with possible damage to the archaeological remains, further investigation is required to assess this (and see also previously SA No 4 Water Quality). The site is not proposed for employment use and therefore, neutral effects for SA Objectives 12-13.

The site is not located near to services and facilities including a Local Centre with the potential for a minor negative effect against SA Objective 14. The site is not located within 800m of existing medical facilities with the potential for major negative effects against SA Objective 17. However, the site is at the edge of the urban area with nearby footpaths that could encourage walking in the countryside so some uncertainty at this stage of overall significance and likely to be minor negative effects for health objectives. The site is also not located within 800m of existing educational facilities with the potential for a minor negative effect against SA Objective 24.

The site is located on existing agricultural land with the potential for minor positive effects against SA Objectives 19-20 and nearby access to green and open space. Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

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<sup>16</sup> [HIS007/a Background Note: Land North of Green Farm, September 2019] <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>

# Gloucester City Plan

## Additional Modifications Schedule

### April 2022

The Additional Modifications below are minor grammatical and spelling errors, and non-material changes that have been made to the plan. They are expressed either in the conventional tracked-changes form of strikethrough for deletions and bold underlining for additions of text. In the interests of being succinct, only those paragraphs that have been amended are shown within this schedule, i.e. unchanged text paragraphs will not be shown below. Main Modifications are also shown where they are contained within the specific paragraph; further details are available in the Main Modification schedule.

Reference in Main Mods Gloucester City Plan	Pre-Submission text	Additional Modification
Paragraph 2.7 - Context  Additional full stop	<p>Gloucester has a strong and growing economy, being the main economic driver in the county along with Cheltenham, and there are aspirations for major economic growth over the coming years(6). Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses(7). The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses(8). The city has a substantial stock of existing employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land The JCS identifies a need for 192 hectares of 'B Class' employment land across the three local authority areas. The strategic allocations provide for a significant quantum of this need, but it is important that additional suitable land is identified within the urban area to support the economy.</p>	<p>Gloucester has a strong and growing economy, being the main economic driver in the county along with Cheltenham, and there are aspirations for major economic growth over the coming years(6). Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses(7). The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses(8). The city has a substantial stock of existing employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land. The JCS identifies a need for 192 hectares of 'B Class' employment land across the three local authority areas. The strategic allocations provide for a significant quantum of this need, but it is important that additional suitable land is identified within the urban area to support the economy.</p>

<p>Paragraph 2.8 - Context</p> <p>Delete additional 'major'</p>	<p>Tourism plays an increasingly important role in the city's economy, generating around 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately £207m. There are major plans to grow this in future years, capitalising on the city's unique and in many cases world class heritage and culture. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events(9). The Docks and canal are assets unique to Gloucester and a major tourist attraction, but which could be capitalised on further, particularly use of the waterspace (10).</p>	<p>Tourism plays an increasingly important role in the city's economy, generating around 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately £207m. There are <del>major</del> plans to grow this in future years, capitalising on the city's unique and in many cases world class heritage and culture. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events9 . The Docks and canal are assets unique to Gloucester and a major tourist attraction, but which could be capitalised on further, particularly use of the waterspace 10</p>
<p>Paragraph 3.1 – Development needs and strategy</p> <p>Comma instead of full stop in housing requirement</p> <p>Other changes shown are Main Modifications</p>	<p>Policy SP1 – The need for new development': <b>at least</b> 14.359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, <b>at least</b> 192 hectares of B-Class employment land to support approximately 39,500 new jobs</p>	<p>Policy SP1 – The need for new development': <b>at least</b> 14,359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, <b>at least</b> 192 hectares of B-Class employment land to support approximately 39,500 new jobs</p>
<p>Paragraph 3.8 – Development needs and strategy</p> <p>Spelling error</p>	<p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council's website.</p>	<p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports <del>proposed</del> <b>proposals</b> to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council's website.</p>
<p>Paragraph 4.1.1 – Development Management Policies. A: Housing</p>	<p>There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucesteris certainly not</p>	<p>There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucesteris certainly not immune</p>



Spelling error	immune from this major social and economic issue. Gloucester’s population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighboring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city’s needs. <del>Further information on the city’s housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.</del>	from this major social and economic issue. Gloucester’s population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighbouring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city’s needs. <del>Further information on the city’s housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.</del>
Paragraph 4.2.4 – Employment development, culture and tourism – Introduction  Tidying wording – removing ‘That said...’ from the beginning of the sentence. Other changes relate to MM14.	That said, the GCP <del>plays its part in allocat</del> esing sites for additional employment land, in whole or in part, at the following locations; <del>SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; and SA21 Part of West Quay, The Docks.; and SA22 Land adjacent to Secunda Way Industrial Estate.</del> Further information is available in Section 4 of this plan – Site allocations.	That said, <del>The</del> GCP <del>plays its part in allocat</del> esing sites for additional employment land, in whole or in part, at the following locations; <del>SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; and SA21 Part of West Quay, The Docks.; and SA22 Land adjacent to Secunda Way Industrial Estate.</del> Further information is available in Section 4 of this plan – Site allocations.
Paragraph 4.2.5 – Employment	Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports	<b><u>It is important that the city protects existing employment land and buildings for the benefit of existing and future business,</u></b>

<p>development, culture and tourism – Introduction</p> <p>Grammatical error Other sentences highlighted in red copied and pasted from paragraph 3.22 of the submitted plan</p>	<p>proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>	<p><b><u>including small and medium size business (SMEs) and ‘startups’, and that opportunities are taken to support business growth and the attractiveness of employment stock.</u></b></p> <p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports <del>proposed</del> <b>proposals</b> to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>
<p>Paragraph 4.2.6 - Employment development, culture and tourism – Introduction</p> <p>Grammatical error</p>	<p>At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets including the Docks and Canal and develop with tourist and cultural base.</p>	<p>At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets including the Docks and Canal and develop with <b>their</b> tourist and cultural base.</p>
<p>Paragraph 4.2.8 - Employment development, culture and tourism – Introduction</p> <p>Grammatical error</p>	<p>The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the designed centres. It covers all designated ‘town centres’, i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.</p>	<p>The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the <del>designed</del> <b>designated</b> centres. It covers all designated ‘town centres’, i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.</p>
<p>Paragraph 4.2.18 – B2 Safeguarding employment sites and buildings – Supporting text</p> <p>Spelling error</p>	<p>Gloucester is a primary focus for economic activity in the county and it in important this is maintained. In order to achieve this, existing sites and premises are protected from redevelopment to alternative uses, unless the proposal can meet the criteria outlined in the above policy. Where opportunities exist, the City Council will support proposals to</p>	<p>Gloucester is a primary focus for economic activity in the county and it is important this <del>in</del> <b>is</b> maintained. In order to achieve this, existing sites and premises are protected from redevelopment to alternative uses, unless the proposal can meet the criteria outlined in the above policy. Where opportunities exist, the City Council will support proposals to</p>

	intensify and improve the quality and offer of existing employment sites – see Policy B3 below.	intensify and improve the quality and offer of existing employment sites – see Policy B3 below.
Paragraph 4.2.24 – B3 New employment development and intensification and improvements to existing employment land – Supporting text  Grammatical error	The City Council’s Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.	The City Council’s Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets <b>the needs</b> of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.
Paragraph 4.2.36 – B6 Protection of public houses – Supporting text  Grammatical error	Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use.	Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use.
Paragraph 4.3.1 – Healthy communities – Introduction and context  Amend Key Principle number	Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle 14 of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities	Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle <del>14</del> <b>12</b> of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities

Paragraph 4.3.9 – C1 Active design and accessibility – Supporting text  Replace ‘or’ with ‘and’	Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking or cycling.	Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking <del>or</del> <b>and</b> cycling.
Paragraph 4.3.21 – C3 Public open space, playing fields and sports facilities  Grammatical error	The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that aren’t shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.	The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that aren’t <b>are not</b> shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.
Paragraph 4.4.24 – D2 Non-designated Heritage Assets  Deleted ‘any future’ as the City Council is now preparing a local list.	4.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future Local List.	4.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to <del>any future</del> <b>the</b> Local List.
E1 Biodiversity and geodiversity  Remove additional bracket	<b>Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS)) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:</b>	<b>Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS)) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:</b>
Paragraph 4.5.9 – E1 Biodiversity and geodiversity	If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as ‘biodiversity offsetting’ in the nearest Green Infrastructure	If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as ‘biodiversity offsetting’ in the nearest Green Infrastructure (GI)



Amend policy reference	(GI) project as set out in the JCS Green Infrastructure Strategy, or if this isn't possible, in Gloucester's designated Nature Recovery Area (NRA) as detailed at Policy E3 of the GCP.	project as set out in the JCS Green Infrastructure Strategy, or if this isn't possible, in Gloucester's designated Nature Recovery Area (NRA) as detailed at Policy E3 <u>2</u> of the GCP.
Paragraph 4.5.38 – E4 Flooding, sustainable drainage, and wastewater  Grammatical error	Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the city Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where 76 possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improvingly hydromorphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.	Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the eCity Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where 76 possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improvingly hydromorphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.
Paragraph 4.5.46 – E5 Renewable energy potential of the River Severn and the Canal  Grammatical error	Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, which will be subject to a Habitats Regulations Assessment (HRA).	Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, <del>which</del> will be subject to a Habitats Regulations Assessment (HRA).
Paragraph 4.5.47 – E6 Development affecting Cotswold Beechwoods Special Area of Conservation  Spelling error	There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a	There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a Gloucestershire

	Gloucestershire wide approach is required in order to successfully mitigate and likely adverse impacts.	wide approach is required in order to successfully mitigate and likely adverse impacts.
Paragraph 4.5.48 - Development affecting Cotswold Beechwoods Special Area of Conservation  Delete likely timing of Mitigation Strategy	The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. The mitigation strategy is expected to be available in early 2020.	The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. <del>The mitigation strategy is expected to be available in early 2020.</del>
Paragraph 4.6.25 – F5 Open plan estates  Missing full stop	Extending the boundary treatment of gardens to incorporate amenity land can reduce the feeling of openness. When the boundary is adjacent to a footpath enclosing the surrounding amenity space can have a negative impact on visual amenity and community safety by narrowing the overall width of the footway and its landscaping. This can reduce views along the footpath and make the footpath feel more enclosed and less safe to use.	Extending the boundary treatment of gardens to incorporate amenity land can reduce the feeling of openness. When the boundary is adjacent to a footpath enclosing the surrounding amenity space can have a negative impact on visual amenity and community safety by narrowing the overall width of the footway and its landscaping. This can reduce views along the footpath and make the footpath feel more enclosed and less safe to use.
Paragraph 4.6.24 – F6 Nationally Described Space Standards  Remove additional word – ‘states’	The NPPF states makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for a variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.	The NPPF <del>states</del> makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for a variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.
Paragraph 4.7.5 – Climate change summary	Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in	Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage

Spelling error	damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.	to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in <del>officers</del> <b>offices</b> and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.
Paragraph 4.7.12 – Climate change summary  Delete ‘recently published’	This policy also links to the recently published the Gloucestershire Energy Strategy 2019	This policy also links to the <del>recently</del> -published the Gloucestershire Energy Strategy 2019
Paragraph 4.7.15 – G1 Sustainable transport and parking  Grammatical error	At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies with the JCS and GCP.	At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies <u>with</u> the JCS and GCP.
G4 Walking  Grammatical error	<b>The City Council will support development proposals that protect and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council’s administrative boundary.</b>	<b>The City Council will support development proposals that protect and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council’s administrative boundary.</b>
Paragraph 4.7.31 G5 Broadband connectivity  Delete extra ‘high speed’ and correct spelling error	The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-fibre broadband by 2025. This policy requires all new residential and commercial development to be serviced by a high speed, reliable and high-speed broadband connection. At present, the main target standard is for full-fibre connectivity. This	The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-fibre broadband by 2025. This policy requires all new residential and commercial development to be serviced by a <del>high speed</del> , reliable and high-speed broadband connection. At present, the main target standard is for full-fibre connectivity. This may well change in

	may well change in the future; if this is the case, it is expected that properties should be meet the best possible standard.	the future; if this is the case, it is expected that properties should be meet the best possible standard.
Paragraph 6.1 Monitoring Framework  Grammatical error	The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a monitoring framework, which are directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required in easily available and reliable.	The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a monitoring framework, which are <i>is</i> directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required in <u>is</u> easily available and reliable.
Glossary  Delete reference to 'Community Infrastructure Levy' – Not reference in Gloucester City Plan	<b>Community Infrastructure Levy</b> - A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.	<del><b>Community Infrastructure Levy</b> – A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.</del>
Glossary  Delete reference to 'Decentralised Energy' – Not reference in Gloucester City Plan	<b>Decentralised Energy</b> - Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.	<del><b>Decentralised Energy</b> – Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.</del>
Glossary  Add 'Gloucester' City Plan and move to alphabetical location in glossary	<b>City Plan</b> – Part of the Development Plan for the City of Gloucester	<b>Gloucester City Plan</b> – Part of the Development Plan for the City of Gloucester.



Gloucester City Plan 2011 - 2031  
**With Modifications**

**April 2022**

Deleted text is struck through  
~~Example~~

New text is bold and underlined  
**Example**

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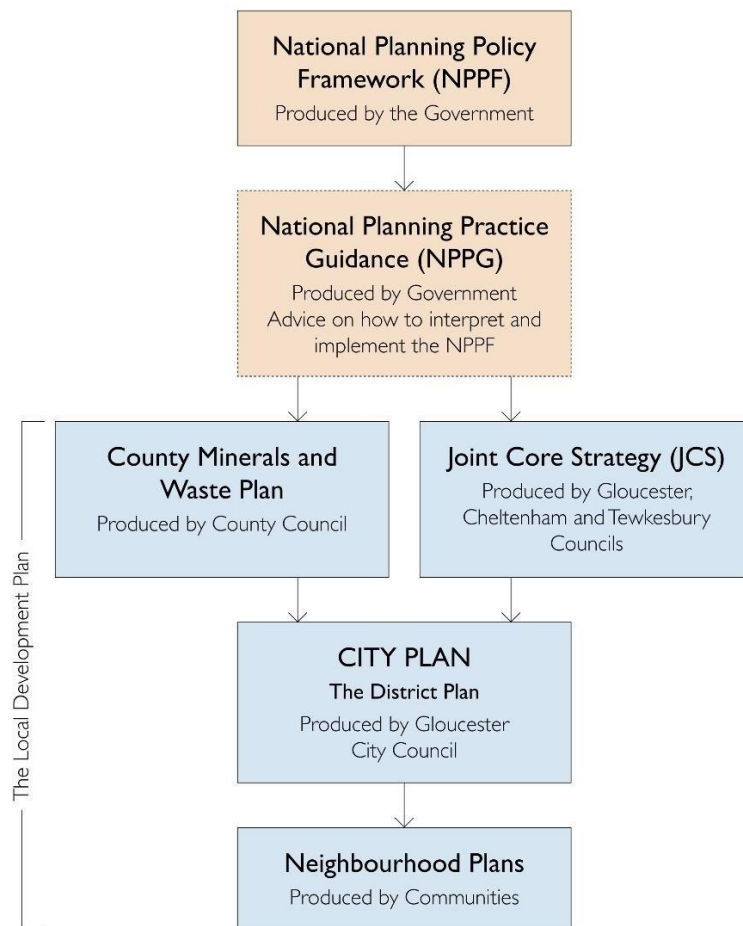
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# 1.INTRODUCTION AND OVERVIEW

## What is the Gloucester City Plan?

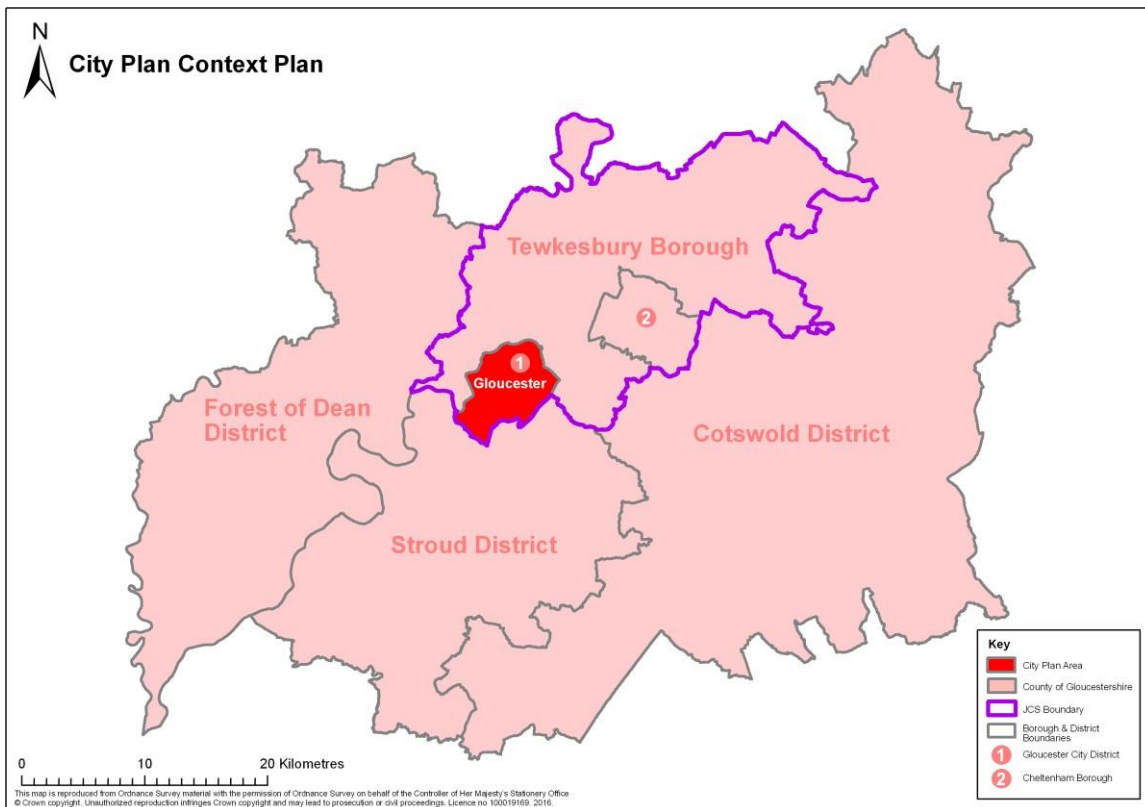
- 1.1 The Gloucester City Plan (GCP), together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), the Gloucestershire Minerals and Waste Local Plans and any Neighbourhood Plans will, when adopted, comprise the statutory Development Plan for Gloucester up to 2031. Together, they set out the city’s policies and proposals for development and use of land. The GCP supports the delivery the Council Plan (2017 – 2020) and other strategies and plans. It is important the GCP is consistent with the objectives and principles of the JCS and the national content set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The diagram below shows the Development Plan for Gloucester City and its relationship with the NPPF and NPPG.



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

01/08/16/14

- 1.2 Between 2011 and 2031, Gloucester has and will experience significant growth. The JCS identifies larger sites for housing and employment and deals with strategic issues such as major infrastructure delivery and transport. The GCP identifies additional site allocations for smaller scale growth and sets out detailed policies for development and how key assets will be protected, for example the historic environment, open spaces and sports facilities. The GCP does not seek to cover strategic issues that are addressed by the JCS or the subsequent review of the JCS. The map below shows the context Gloucester City Council and the GCP, in relation to the JCS area and Gloucestershire.



## Joint Core Strategy

- 1.3 The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. It is a **the** strategic plan that covers a twenty-year period between 2011 and 2031, addressing cross-boundary planning matters including housing need for each of the local authorities, the need for employment land and strategic site allocations. **The JCS provides strategic policies for the local authorities, in accordance with paragraphs 20 – 23 of the NPPF. The district plans provide non-strategic policies, which for Gloucester City is the Gloucester City Plan.**
- 1.4 The constrained nature of both Gloucester City and Cheltenham Borough and resulting lack of land to provide for future development needs, meant it was necessary for sites to be identified in Tewkesbury Borough to support the required levels of growth. This conforms with JCS strategy which is to maximizing urban capacity, alongside the identification of 'urban extensions' to the main urban areas of Gloucester and Cheltenham. This is so as to concentrate new development in and around the existing urban areas to meet their needs, to balance housing and employment needs, and provide new development close to where it

is needed and where it can benefit from the existing and enhanced sustainable transport network. The JCS was formally adopted by all three local authorities in December 2017. Together, the JCS and GCP form the Local Plan for Gloucester and should be read together when preparing planning proposals.

- 1.5 The review has now begun and an 'Issues and Options' consultation was held between November 2018 and January 2019. ~~This includes a focused and accelerated review of the retail and city/town centre policies which are already progressing.~~ **The next stage will be the Draft JCS Review (Regulation 18). At the time of writing the programme is being finalised, but it is anticipated the draft plan will be considered by the authorities by the end of 2022, followed by public consultation.** Further information is available on the JCS website at [www.jointcorestrategy.org](http://www.jointcorestrategy.org).
- 1.6 **The other Development Plan Documents for Gloucester City are the Gloucestershire Waste Core Strategy 2012 – 2027, and the Minerals Local Plan for Gloucestershire 2018 – 2032. Foresee of use, each policy in the GCP is accompanied with a table that identifies other policies in the Development Plan where there is a direct relationship. A full schedule is provided at Appendix 2.**

## Neighbourhood Development Plans

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

## Evidence base

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

## Sustainability appraisal

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

## ~~What has happened so far?~~

1.10 — This is the final stage in the preparation of the Gloucester City Plan (GCP) before it is submitted to the Planning Inspectorate for independent examination. The GCP has been prepared over several years and in different stages. At each stage, there has been engagement with the community and stakeholders on what the content of the GCP should be and to generate comments and debate on draft proposals as they emerge. The process to date has been as follows:

- **Scope — 2011:** This consultation set out the context for the plan and the key issues for Gloucester. It sought views on the types of planning policies that the GCP should contain and the areas that should be identified for development or protection.
- **Part 1 — 2012:** This stage of the plan took the scope further, providing further detail of the issues that Gloucester faces and setting out a number of ‘key principles’ that should be taken forward through the GCP.
- **Part 2 — 2013:** This stage of the plan focused on the development needs of the city and considered potential site allocations.
- **Draft Plan — 2017:** This stage of the plan pulled the previous stages of the plan together, drawing on the outcomes of the different consultations to set out a range of proposed site allocations and detailed policies.

1.11 — The City Council is now consulting on the final stage of the GCP, known as ‘Pre-Submission’. This is under Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2015. Between the Draft Plan and Pre-Submission version, changes have been made to reflect:

- Consultation responses;
- Changes made to the Adopted Joint Core Strategy through the examination process;
- Changes made by the Government to the National Planning Policy Framework and Planning Practice Guidance; and
- New evidence and new City Council strategies.

1.12 — Taken together, these changes have created a much more succinct plan and the number of policies has therefore reduced quite substantially. Policies relating to retail and city/town centres have been removed as they are now addressed through the Adopted Joint Core Strategy and are being taken forward as part of the Review.

## **Responding to the consultation**

1.13 — The City Council is consulting on the Pre-Submission Gloucester City Plan for a period of six weeks between 7 November and 20 December 2019. Responses (known as ‘representations’), can be made via the consultation portal at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan). Alternatively, you may email your response to [cityplan@gloucester.gov.uk](mailto:cityplan@gloucester.gov.uk) or write to: Planning Policy Team, Gloucester City Council, PO BOX 3252, Gloucester, GL1 9FW.

1.14 — Copies of this document are available at all libraries within Gloucester City, the Gloucester City Council ‘Hub’ on Westgate Street and the Guildhall. Responses submitted to the consultation will be considered by an Independent Planning Inspector at a public examination. The role of the Inspector will be to examine whether the GCP is ‘sound’ and complies with the legal requirements. More information on the examination procedure has been produced by the Planning Inspectorate and is available from their website.

1.15 — If you wish to make a representation seeking a change to the GCP, in your response you



should explain why the Plan is not sound and/or legally compliant. Where possible you should provide evidence to support your representation and make clear what changes need to be made as a result.

- 1.16 — Please note that your representation cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations will be made available on the Council's website. Your name and organization (if applicable) will be viewable. However, your contact details will be removed. If your representation is anonymous it cannot be taken into account.

## **What happens next?**

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

## **Structure of the Plan**

- 1.11 The GCP is structured as follows:

- Section 1: Introduction and overview of the GCP, it's wider links with the JCS;
- Section 2: Planning for Gloucester: Vision and key principles;
- Section 3: Development needs and strategy
- Section 4: Development Management policies, organised under key themes such as 'housing' and 'healthy communities';
- Section 5: Site allocations;
- Section 6: Monitoring framework;
- Section 7: Strategic policies and proposals in the Joint Core Strategy and Gloucester City Plan;
- Section 8: Superseded policies;
- Section 9: Glossary;
- Appendix 1: Housing trajectory and five-year housing land supply calculation; and
- Appendix 2: Relationship with the Adopted Development Plan.

## 2. PLANNING FOR GLOUCESTER

### Context

- 2.1 The Gloucester City Plan (GCP) delivers the Joint Core Strategy (JCS) locally and addresses local issues and opportunities. The City Plan Vision statement, key principles policies have been informed by the Council Plan (2017 - 2020), City Vision: A City ambitious for its future and proud of its past (2012 – 2022), other relevant strategies and plans, community and stakeholder consultation, and evidence around the issues and opportunities that exist in the city. The following section provides a summary of the city, based on the above, highlighting some of the issues and opportunities, which then feed into the subsequent Vision and Key Principles..

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

- 2.2 Gloucester is a small city located in the south west of England. The city is bound by the River Severn to the west with the Forest of Dean beyond. To the east lies the Cotswold escarpment with the Cotswold Areas of Outstanding Natural Beauty (AONB) beyond. It is strategically located with excellent links by road, rail and waterways, and is near Gloucestershire, Bristol, Birmingham and Cardiff airports.
- 2.3 The city's population in 2018 was estimated to be 129,285 and is growing year on year<sup>1</sup>. Gloucester will experience the greatest population growth of all the district authorities in Gloucestershire over the coming years, with an expected growth of 20.1% between 2010 and 2035<sup>2</sup>. It is a diverse city, with a wide range of different ethnicities, cultures and backgrounds.
- 2.4 The population of Gloucester is relatively young with 24.6% of people being under the age of 19, the highest of all Gloucestershire districts, the South West and UK. This is set to increase with the number of children and young people predicted to grow by over 16.4% between 2010 and 2035<sup>3</sup>. By 2035 Gloucester is expected to have 6,000 people over the age of 85. The GCP needs to ensure that it plans for the housing needs of this older population as well as meeting the needs of those with specific housing needs.
- 2.5 There are around 55,690 homes in Gloucester<sup>4</sup> and recent evidence shows there has been significant growth in new homes. The JCS identifies a need of 14,300 new homes for the city between 2011 and 2031. Approximately 35% of these new homes will be provided in locations on the edge of the city, outside of the City Council's administrative area. However, it is important that sufficient sites are identified within the city itself to provide the amount and type of new homes that the community needs and, given the limited amount of developable land, it has been necessary to consider all possible development sites on both greenfield and brownfield land and to ensure that the very best use is made of these sites.

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

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

<sup>3</sup> Mid-year population estimates, Office for National Statistics

<sup>4</sup> Centre for Cities

- 2.6 Most homes in the city are owner-occupied<sup>5</sup>, the highest levels of home ownership are found in the wards of Abbey, Elmbridge, Grange, Hucclecote and Longlevens (more than 80%). The lowest levels of home ownership are in Kingsholm and Wotton, Podsmead and Westgate. Privately rented homes are most common in Westgate, Kingsholm and Wotton and Barton and Tredworth. It is important a mix of new homes is delivered to meet the needs of our existing and future communities.
- 2.7 Gloucester has a strong and growing economy, being the main economic driver in the county along with Cheltenham, and there are aspirations for major economic growth over the coming years<sup>6</sup>. Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses<sup>7</sup>. The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses<sup>8</sup>. The city has a substantial stock of existing employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land. The JCS identifies a need for 192 hectares of 'B Class' employment land across the three local authority areas. The strategic allocations provide for a significant quantum of this need, but it is important that additional suitable land is identified within the urban area to support the economy.
- 2.8 Tourism plays an increasingly important role in the city's economy, generating around 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately £207m. There are ~~major~~ plans to grow this in future years, capitalising on the city's unique and in many cases world class heritage and culture. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events<sup>9</sup>. The Docks and canal are assets unique to Gloucester and a major tourist attraction, but which could be capitalised on further, particularly use of the waterspace<sup>10</sup>
- 2.9 Within the city centre, the council is working with partners to deliver a strong regeneration programme. This has seen the delivery of a new transport hub and plans are afoot for the redevelopment of the wider King's Quarter area to provide a wide range of different uses, including commercial units and offices, and a high-quality arrival point into the city centre. The Regeneration and Economic Development Strategy (2016 – 2021) sets out a number of priority regeneration schemes and smaller development sites, along with objectives that seek to deliver significant improvements to the city centre, jobs, growth, community benefits and an enhanced cultural offer.
- 2.10 Gloucester city centre has a good range of shops, services and facilities. However, evidence also shows that there continues to be a poor perception from shoppers around the quality of the environment and the range of shopping available. It further shows that there is a lack of choice from some types of product, particularly fashion / clothing, and that there are a limited number of independent retailers<sup>11</sup>. The city centre has lost trade to other competition centres over recent years, as well as increased competition from out-of-centre

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

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

<sup>7</sup> Ibid

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

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

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

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

retailing and the internet<sup>12</sup>. Gloucester Quays opened in 2009 and now offers a wide-range of discount retailing and a leisure quarter including a multiplex cinema, restaurants, café and bars. In the future, it is important that further investment is secured in the city centre and that it capitalises on the success of key visitor attractions in the city, including Gloucester Quays, the Cathedral and Gloucester Rugby. Equally, that new retail and leisure development is planned to complement and not compete with or undermine the city centre.

- 2.11 There are pockets of significant deprivation in the city and in some cases, these are worse than the national average. It is estimated that around 20% of children in the city live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, suicide and attempted suicide, all of which are at higher levels than the national average<sup>13</sup>. Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the city's residents.
- 2.12 Half of people in Gloucester aged between 16 and 64 are educated to at least NVQ3 level and above. However, 8.1% of the population have no qualifications<sup>14</sup>. The city has several high performing schools and is home to the University of Gloucestershire, satellite campuses for the University of the West of England and Gloucestershire College. Hartpury College is located approximately 5 miles to the north east of the city but a substantial number of its student live in the city during term-time. A key issue for the GCP is to create a positive environment to allow the college and universities to grow and attract students.
- 2.13 Gloucester is actively engaged in sport and has many sports clubs, particularly in football, rugby union and cricket, but with growing participation in rugby league, American football, Gaelic football and gymnastics<sup>15</sup>. Overall, participation in formal sports is increasing. There are a large number playing pitches and sporting facilities - but there are shortages in some areas. Evidence shows that many playing fields and sports facilities are poor quality but have been improving<sup>16</sup>. An expanded multi-sports hub has recently been completed in the north at Oxstalls Sports Park and the University of Gloucestershire, including two full-sized 3G artificial surfaces and a large indoor sports hall with stadium seating. The City Council is also working with partners to bring forward a Sport and Community Hub at 'Blackbridge' in Podsmead.
- 2.14 Car ownership and car use continues to dominate, and there are significant congestion issues on some roads, particularly at peak hours<sup>17</sup>. However, a high number of people live and work within an acceptable commutable area, which means there are opportunities for increased use of sustainable transport modes. A new modern bus station has recently been delivered as part of Phase 1 of the King's Quarter regeneration project. Funding has also been secured through the Local Enterprise Partnership for substantial improvements to the adjacent railway station; this will have a positive impact in encouraging people to use alternative forms to transport to the private car. There is a lack of cycle lanes between Gloucester and Cheltenham. It is important that the GCP, together with the JCS, creates a

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

<sup>13</sup> Gloucestershire Health and Wellbeing Strategy 2019 - 2030

<sup>14</sup> NOMIS official labour market statistics

<sup>15</sup> Gloucester Playing Pitch Strategy, 2015 – 2025, Gloucester Built Sports Facilities Strategy (2019)

<sup>16</sup> Ibid

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



positive framework that supports the delivery of the Gloucestershire Local Transport Plan<sup>18</sup> and a move towards increased use of more sustainable modes of transport, including active travel.

- 2.15 There are 48 formal play areas in Gloucester and over £1m of investment was made by the City Council in upgrading these between 2009 and 2015. However there remain shortages in open space in some parts, both in terms of quantity and quality<sup>19</sup>. There are numerous informal leisure and recreational assets including for example Robinswood Hill Country Park and Alney Island, both of which have received recent investment and subsequent increases in visitor numbers. As the population of the city grows it is important to protect open spaces, to invest in improving facilities and reduce recreational damage from increased usage.
- 2.16 Climate change is the greatest long-term challenge facing human development. The Gloucester Climate Change Strategy (2010) identifies that even in the 'best-case scenario' Gloucester is likely to experience winters up to 42% wetter, more frequent flooding, worsening summer air pollution, drier summers and loss of wildlife habitats and species. Planning can make a major positive contribution to tackling climate change by shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as weather events and flood risk. The JCS and GCP contain policies that will require new development to be designed in ways that promote the **efficient use of resources and waste reduction, greater** use of sustainable transport, generate energy from renewable sources, provide tree planting, create and connect to public open spaces and multi-functional green infrastructure, make use of Sustainable Urban Drainage Systems and opportunities to improve flood risk and manage it better, and to deliver improvements and net gains to biodiversity.
- 2.17 Gloucester is characterised by the River Severn, which runs along the western edge of the city and there are various tributaries that run into it. As a result, some areas are subject to flood risk, particularly to the north, west and south west. It is important therefore that the necessary policy framework is in place to ensure this is adequately assessed and addressed through new development, both for today and factoring in the predicted effects of climate change.
- 2.18 Gloucester has a unique and rich heritage formed by historic buildings, street patterns, archaeological remains, landscape and other physical remnants of its past. A city of intense urban activity for nearly two thousand years, it has a special legacy of nationally significant heritage from all historic periods. Heritage is a central component in the identity of Gloucester and defines much of what is locally distinctive and impacts on how residents and visitors feel, use and perceive the city. This has wide reaching implications on the image of the city, the economy, tourism and the health and wellbeing of residents, as well as providing distinctive character and landmarks. The Gloucester Heritage Strategy (2019) sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.

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<sup>18</sup> Ibid

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

## Vision

- 2.19 The GCP aims to be aspirational but also to be realistic. The NPPF requires local authorities to take a positive approach that delivers sustainable development, reflecting the three central considerations; environmental, social and economic.
- 2.20 The GCP Vision to 2031 has evolved throughout the process and the starting point is the City Vision, which is, 'Gloucester will be a flourishing, modern and ambitious city, which all residents can enjoy.' This is then taken further through five 'key aims', which are; (1) A flourishing economy and city centre which meets the needs of our residents, businesses and visitors; (2) A vibrant evening economy; (3) A city which improves through regeneration and development; (4) A city where people feel safe and happy in their community; and (5) A healthy city with opportunities available to all.
- 2.21 This has been taken further to reflect the Council plan, strategies, plans and evidence around issues and opportunities in creating a Vision for the GCP, which is as follows:

Between 2011 and 2031 the city Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

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

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location, whilst supporting business growth and expansion within the city itself.

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

Health and wellbeing will be improved through the protection and provision of active streets, open and green spaces, woods and trees, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design, focused on protecting the quality and local distinctiveness of the city, whilst responding to **and building resilience and adaptability to** the implications of climate change.

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

## Key principles

2.22 To deliver the City Plan Vision, a set of 13 key principles have been identified. These feed into the policies and ensure the Vision is met.

1. Ensure that new development contributes to the delivery of a transforming, **low carbon** city which **is resilient and adaptable to a changing climate**, brings regeneration benefits, promotes sustainable development, **incorporating measures to reduce waste, and** makes the most efficient use of brownfield land and the reuse of vacant **and underused** buildings and space.
2. Ensure that new development is supported by the necessary infrastructure.
3. Regenerate and develop the city centre and other areas of the city in a way that responds to and meets the needs of the 21<sup>st</sup> century and builds on strengths such as heritage and the waterside location.
4. Build on existing strengths to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer.
5. Encourage a vibrant and safe evening and night-time economy that appeals to all age groups and interests and encourages more overnight visitors.
6. Provide a balanced mix of new homes that provide for the needs and aspirations of existing and future communities.
7. Encourage and facilitate inward and homegrown investment, attract innovative growth sectors, create high and stable levels of economic growth and productivity, and increase jobs and skills development opportunities.
8. Improve educational attainment, skills and learning opportunities.
9. Protect and enhance the city's leisure, recreation and environmental assets, including the historic environment, public open spaces, woodlands and trees, allotments, areas of nature conservation, sensitive landscapes, playing fields and sports facilities.
10. Deliver development that achieves high quality design and layouts that integrates new and existing communities, reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable city.
11. Ensure that development responds, mitigates and minimises its impact on climate change through sustainable design and construction, addressing flood risk and encouraging the use of sustainable forms of transport, making the most of existing infrastructure.
12. Improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to

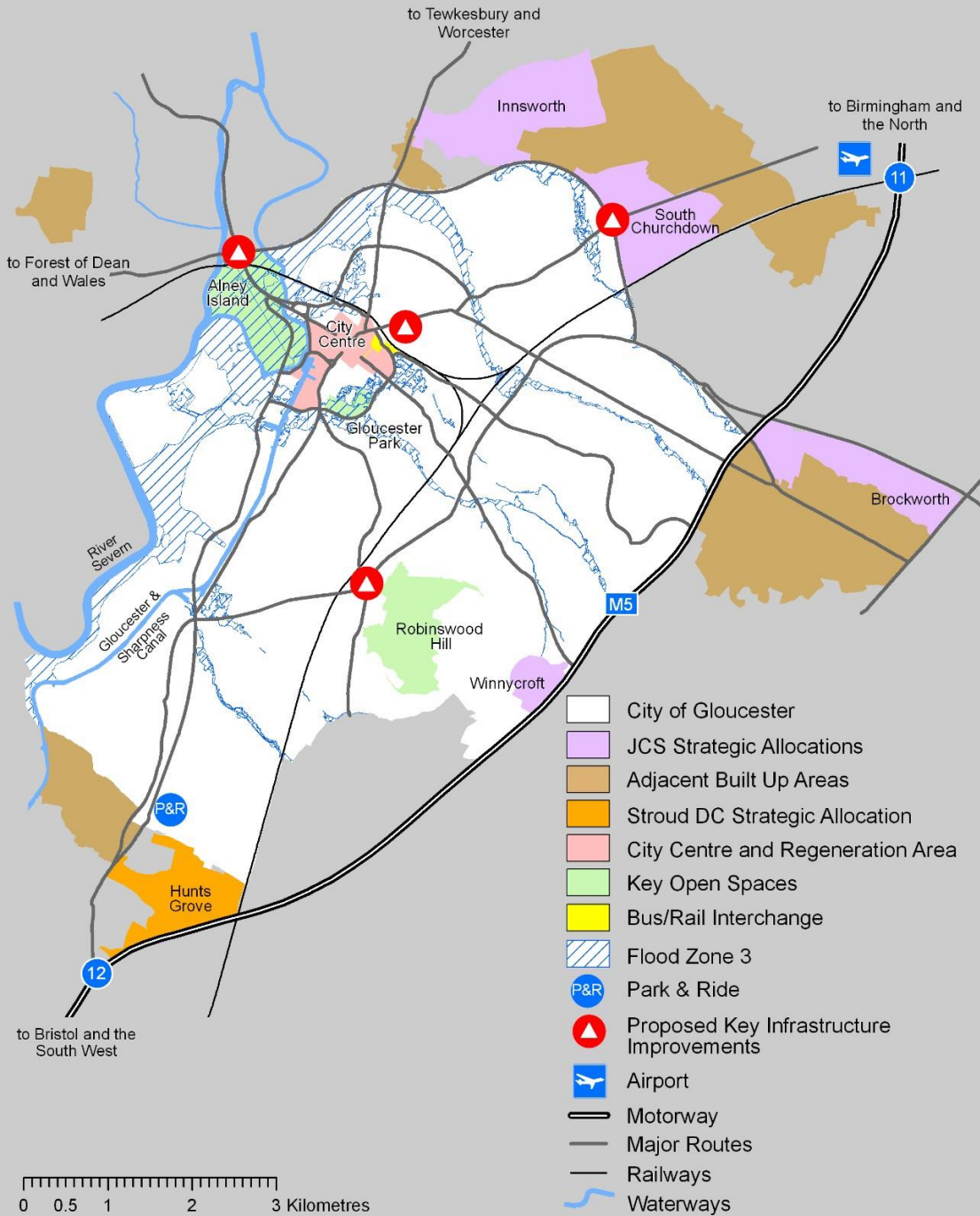
good quality open spaces, playing fields, multi-functional green infrastructure and community facilities.

13. Tackle poverty and deprivation and the worst affected areas of the city.

2.23 The following key diagram shows Gloucester City within the context of JCS growth and key constraints. It shows the key JCS growth area to the north and east, located within Tewkesbury Borough, as well as development to the south of the city's boundary in Stroud District.



# Key Diagram



### **3. DEVELOPMENT NEEDS AND STRATEGY**

3.1 The NPPF requires that local authorities should positively plan to deliver development needs. For Gloucester, these development needs are set by the strategic level Joint Core Strategy (JCS), which was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council **in December 2017**. Between 2011 and 2031, the development needs for **Gloucester** are **set out by the following JCS policies**.

- Policy SP1 – The need for new development’: **at least** 14,359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, **at least** 192 hectares of B-Class employment land to support approximately 39,500 new jobs.
- Policy SD2 – Retail and City / Town Centres’: 45,500 sq m (net) of comparison goods retail floorspace and 3,600 sq m (net) of convenience goods floorspace.
- Policy SD13 – ‘Gypsies, Travellers and Travelling Showpeople’: This policy sets out a criteria-based policy for the assessment of planning applications for these communities. The supporting text sets out accommodation needs arising from the Gloucestershire Gypsy and Traveller Accommodation Assessment (2016~~7~~). For Gloucester **City**, it identifies a need of two Gypsy pitches and 16 Travelling Showpeople plots arising from Gloucester’s existing communities. In relation to transit pitches for those members of the community travelling through the area, the GTAA recommends that there is no need for such provision and that the authorities should instead consider the use of ‘temporary tolerated stopping places’.

3.2 Policy SP2 ‘Distribution of new development’ of the JCS, sets out the delivery strategy, which is ~~the delivery of~~ development that maximises urban capacity, alongside the identification of urban extensions (strategic allocations) to the main urban areas of Gloucester and Cheltenham. This is so as to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to balance employment and housing needs, and provide new development close to where it is needed and where it can benefit from the existing and enhanced sustainable transport network.

3.3 Most strategic allocations are in Tewkesbury Borough; this reflects the fact that Gloucester has a very limited land supply and in order to meet development needs, it has been necessary to work in partnership with Tewkesbury Borough Council to identify urban extensions within that local authority area. One strategic allocation, Winnycroft, is located within the administrative area of Gloucester City.

#### Housing

3.4 Gloucester city’s housing delivery position, as of 31st March ~~2019~~ **2021**, is summarised in the table below.

	Gloucester City	Tewkesbury Borough
JCS Strategic allocations (Tewkesbury Borough)	-	<b>4,895,331</b>
Winnycroft Strategic allocation (Gloucester City)	620	-
Completed	<b>3,993,070</b>	
Planning consents ( <b>commitments</b> )	<b>2,339,769</b>	-
‘Windfall allowance’	<b>640,512</b>	-
Gloucester City Plan allocations	<b>972,920</b>	-

Other supply	92	-
TOTAL	13,459	13,314

3.5 Further information is available from the housing monitoring report (September ~~2019~~**2021**), available to download from the City Council’s website.

3.6 Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to ~~900~~ **1,043 dwellings as of the end of the monitoring period to March 2021**. This **A** shortfall is acknowledged and accepted within the JCS **at** Policy REV01 ‘Gloucester and Tewkesbury Housing Supply Review’ ~~states the need for an immediate review of housing supply and that ‘The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities’.~~

~~The JCS Review has already commenced with an ‘issues and options’ consultation taking place during November 2018 and January 2019. Further information is available from the JCS website.~~

**3.7 Further details of Gloucester City’s housing trajectory and five-year housing land supply is provided at Appendix 1.**

Employment land

3.8 **Employment development is considered on a JCS-wide basis. Across the JCS area, through both strategic and non-strategic allocations, provision has been made for at least 192 hectares of traditional employment land. At the JCS examination, evidence was provided to demonstrate that there was a capacity of 7ha of employment land in the city** <sup>20</sup>. **The GCP allocates** From an employment perspective, a total of 14.6 8.1 hectares is allocated, either as 100% ‘B Class’ employment sites or as part of wider mixed-used schemes. **Together with recent commitments, such as those at King’s Quarter, there is the opportunity for a substantial amount of floorspace to be delivered over the plan period.** ~~Together, they will deliver a substantial amount of employment floorspace. Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed proposals to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.~~

Retail and city / town centres

3.9 Policy SD2 ‘Retail and City / Town Centres’ provides the current JCS position. However, the policy is subject to an immediate review criterion 7 of the policy states ‘Following adoption of the JCS, this policy will be subject to an immediate review. The single-issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail, market share between different designated centres, city / towncentre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.’ As mentioned above, this review has already commenced with an ‘issues and options’ consultation held between November 2018 and January 2019.

<sup>20</sup> **EXAM180 ‘JCS Economic Update Note’**

~~Consultants have been appointed to undertake the necessary evidence and support the JCS authorities in taking forward the emerging plan.~~ **This will be progressed as part of the full JCS Review.**

Gypsy and traveller communities

- 3.10 As identified above, there is a need for additional permanent Gypsy and Travelling Showpeople accommodation to meet the needs of Gloucester's existing communities. **The Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 identifies an overall need for two Gypsy/Traveller pitches and 16 Travelling Showpeople plots, between 2016 and 2031.** The City Council has reviewed all possible site opportunities, including their own land assets and those submitted through 'call for sites', and it has been concluded there are none that are suitable, available and viable within the city. A request has been submitted to all neighbouring authorities, under the 'duty to cooperate', for help in identifying deliverable sites. **Further details of the five-year housing land supply requirement for Travelling Showpeople plots is provided at Appendix 1.**
- 3.11 **Notwithstanding this, Policy SD13 'Gypsies, Travellers and Travelling Showpeople' and Policy SD11 'Housing mix and standards' set out a positive policy mechanism to deliver sites for both travelling and non-travelling households, where consistent with other policies in the Development Plan.**

**Windfall development**

- 3.12 **The JCS Review is underway. This will consider the quantum of development required and the overarching spatial strategy moving forward, including the identification of development sites. Notwithstanding this, in the context of Gloucester's current development requirements as set out in the adopted JCS, relating to general housing needs, employment land and accommodation for Gypsies, Travellers and Travelling Showpeople, the City Council will take a positive approach to proposals for additional development over and above those allocated within the development plan where they are consistent with the development strategy of the JCS and policies of the Development Plan as a whole.**



# 4. DEVELOPMENT MANAGEMENT POLICIES

## A: HOUSING

### Introduction and context

- 4.1.1 There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucester is certainly not immune from this major social and economic issue. Gloucester's population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighbouring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city's needs. ~~Further information on the city's housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.~~
- 4.1.2 **Policy SP1 'The need for new development' of the adopted JCS sets a housing requirement of at least 14,359 new homes over the plan period of 2011 – 2031. Table SP2b of the JCS identifies the urban capacity at that time as 7,772 homes, taken from different sources of supply at Table SP2a. This figure does not represent a cap on capacity and, as highlighted elsewhere in the GCP, the City Council takes a positive approach to development proposals, where consistent with the development strategy of the JCS and policies contained in the Development Plan as a whole.**
- 4.1.3 **The supporting text to Policy SD13 'Gypsies, Travellers and Travelling Showpeople' identify needs relating to the Gypsy, Traveller and Travelling Showpeople community. At the time of writing, there are no deliverable sites for these need in Gloucester City. However, the Council continues to explore opportunities within its administrative area and work proactively with neighbouring local authorities to meet these needs. Furthermore, Policy SD13 and Policy SD11 'Housing mix and standards' are enabling policies that support the delivery of suitable sites, where in accordance with the development plan, should they come forward as windfall proposals.**
- 4.1.4 **Appendix 1 provides the housing trajectory and five-year housing land supply calculation as of the end of March 2021. In addition, it appears from limited evidence available (21) that as of 1 April 2022, the Council will be able to demonstrate a five-year supply of deliverable housing on adoption of the GCP.**
- 4.1.5 When people have decent, affordable and secure housing this acts as a foundation for healthy and happy communities and stable family lives. Ideally good housing needs to be close to schools, healthcare and public transport links. Good housing improves environmental and economic wellbeing and helps to create stronger communities and places that can act as a draw to investment and skilled workers.

**(21) In December 2021 the City Council was subject to a cyber incident that removed access to systems**

**used to manage planning applications, and which records information necessary to complete monitoring and a five-year supply calculation. The Council has undertaken a headline assessment, using predicted figures in the existing housing trajectory, and will prepare a full statement in due course.**

- 4.1.6 The policies in this chapter specifically reflect City Plan Key Principles 1, 3, 6 and 10. The GCP aims to create a policy framework whereby the needs of all types of households are met. The plan seeks to support families, single people, students, self-builders, the elderly and those with disabilities or particular special needs, **Gypsies, Travellers and Travelling Showpeople**. Based on the NPPF, Policy A1 provides the overall driver which seeks to use land and buildings effectively and efficiently. If this is achieved, then there is a greater prospect of a. achieving higher densities which will increase the supply of homes and b. protecting and preserving sites which need to be protected for their natural environmental value.
- 4.1.7 Further information in relation to policies in this section is provided in the Housing Background Paper, available to download from the City Council’s website.

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

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>A1: Effective and efficient use of housingland and buildings</u></b>	<b><u>SP2: Distribution of New Development</u></b> <b><u>SD4: Design Requirements</u></b> <b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b> <b><u>SD14: Health and Environmental Quality</u></b>

Development **will be permitted where it** ~~proposals are required to make~~s effective and efficient use of land and buildings. Development proposals should:

1. Result in overall improvements to the built and natural environment; and
2. Be of a suitable scale for the site and not have a significant adverse impact on the character of the locality, the appearance of the street scene, ~~or the amenities enjoyed by the occupiers of the neighbouring properties~~ **and the living conditions of neighbouring occupiers or future residents**; and
- ~~3. Not lead to a saturation of intensified properties within the area; and~~
3. Provide adequate off-street parking, access, covered and secure cycle storage which provides for the existing and proposed use; and
4. Not prejudice the potential for the comprehensive development of adjacent land; and
5. Provide outdoor amenity space and garden space at a level that reflects the character of the area and the scale of the development; and
6. Provide adequate, well designed, appropriately located and accessible bin storage areas; **and**
7. **Be well-designed to create and support healthy living conditions.**

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

- 4.1.8 Gloucester is a growing city which is constrained by several physical boundaries. Land is a precious resource and it is imperative that development maximises the number of homes and jobs provided, whilst safeguarding and improving the built and natural environment, and creating safe and healthy living conditions.
- 4.1.9 The National Planning Policy Framework (NPPF) encourages local authorities to make the most effective use of land in meeting the need for new homes and other uses. More specifically, the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, planning policies should avoid homes being built at low densities, developments make the optimal use of each site and that authorities consider the use of minimum density standards for city and town centres and other locations that are well served by public transport.
- 4.1.10 When considering the potential capacity of site allocations within the GCP, the City Council has identified those sites where higher densities are more appropriate in respect of their location and character. These are near the bus and rail interchange and within or adjacent to the city centre. Elsewhere, the indicative capacity has been determined based on a higher-level suburban density consistent with locations within the main urban area and in accordance with the Strategic Assessment of Land Availability (SALA) methodology.
- 4.1.11 However, it is not considered appropriate to set minimum densities for Gloucester City. This is because of the sensitive historic context within this area, with over 700 Listed Buildings and almost total coverage by different Conservation Areas, each with its own special character and distinctiveness. The most appropriate approach therefore is for applications to seek the most efficient use of land on a case-by-case basis, in the context of its location and character.

- 4.1.12 Developments will contribute to overall improvements to the built and natural environment of the city, including where appropriate its heritage. This includes ensuring that the scale of the development is befitting of the site and its wider locality and not cramped, awkward or 'squeezed' in appearance. This can be achieved by a proper site analysis and full understanding of the character of the area. In this regard, the Gloucester Townscape Character Assessment (2019) will be a particularly important consideration in determining appropriate densities and forms of development.
- 4.1.13 To increase density developers are encouraged to move away from smaller homes on smaller plots with less storage and amenity space, as this approach can often result in a cramped appearance and reduce mental wellbeing. Developers are encouraged to consider a range of innovative products and solutions that can compete with standard housing products. This could include apartments that are designed to be more desirable than a standard sized two- or three-bedroom house. This could be achieved by providing a higher quality of living environment through maximising natural light, which can provide views and a feeling of space and mental wellbeing, useable balconies, higher ceiling heights, increased storage, larger room sizes, additional reception or bedroom spaces, excellent standards of sound insulation, and architectural design that is more appealing than a standard two or three bedroom house. Three or more-bedroom apartments are encouraged and may appeal to smaller families and 'down-sizers' freeing up valuable family homes. An additional bedroom is often appealing to down-sizers as it allows for carers, visitors, or hobbies and interest to be pursued.
- 4.1.14 Improvements to the natural environment will be proportionate to the scale of development and could range from SUDs systems that extend the Green Infrastructure network to smaller scale biodiversity support and habitat creation through green roofs, tree planting, bat boxes, bird boxes and the like.
- 4.1.15 Within the City Centre evidence, including the Heritage Strategy (2019), points to many vacant floors above the commercial uses that operate at ground floor level. These vacant floors represent an opportunity for conversion to active uses including residential and office repopulating the city centre and bringing back into positive use heritage assets. Residents and workers in the city centre create activity and help to support its viability and vitality. This enlivens the area and helps to reduce crime and the fear of crime by providing natural surveillance, particularly in the evenings.
- ~~3.1.13 Where it is proposed to intensify an existing building (by conversion into flats or large House in Multiple Occupation) it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area including its character. When assessing whether a proposed intensification of a dwelling would impact the character of the area consideration will be given to the number of existing of intensifications in the area. Applications that would result in a saturation of family homes converted into flats or HMOs will not be permitted. Saturation is deemed to be reached if:~~
- ~~1. It would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or~~
  - ~~2. Intensified properties represent more than 10% of households within a 100-metre radius of the application property.~~
- 4.1.16 Careful consideration will be given to the design and location of the proposal as well as to amenity space, parking, servicing and access arrangements. Any residential development,



including the intensification of an existing dwelling, will be required to provide a suitable housing mix in accordance with SD11 Housing Mix and Standards of the JCS.

- 4.1.17 The City Council operates bin and kerbside recycling facilities. Recycling is an important part of the Council's commitment to sustainability. New developments will need to demonstrate how they can comfortably provide space for the various bins required so that residents can easily access all of the recycling and collection services.
- 4.1.18 Good design is necessary in this area to encourage use of the service, to aid refuse collection, maintain a visually attractive streetscene and to ensure that the highway is kept safe and free from obstruction. It is important that bin storage is accessible but also discreet and not located directly under openable windows. Communal collection facilities for new streets are aspirational as this can often take up less space and make bin storage more discreet.

## Policy A2: Affordable Housing

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

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

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

- ~~3.1.17 Gloucester has a significant need for more affordable homes. JCS Policy SD12 sets out the overarching strategic policy position; 'Outside of the strategic allocations, on sites of 11 dwellings or more, or sites with a maximum combined floorspace of greater than 1,000 sq m; a minimum of 20% affordable housing will be sought on developments in Gloucester City...' This policy reflects the fact that the evidence underpinning the JCS identified value areas within which different levels of affordable housing could be achieved. This evidence has been strengthened through the Viability Appraisal prepared in support the GCP, and this demonstrates that a 25% figure can be supported residential developments in the city. Please note that since the JCS was adopted, the Government has amended the affordable thresholds as reflected in the policy above.~~
- ~~3.1.18 Affordable housing is defined within the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), including (a) affordable housing for rent (b) starter homes (c) discounted market sales housing (d) other affordable routes to home ownership such as shared ownership.~~
- ~~3.1.19 In accordance with the adopted JCS, affordable housing should be provided on-site and~~

seamlessly integrated and distributed through the development scheme. Developments should also include a balanced mix of dwelling sizes, types and tenures to meet the future housing needs of the area, including affordable rent, and the design and price of homes should ensure they are genuinely affordable and fit for purpose.

3.1.20 The density, layout and type/tenure mix of a site can impact on viability and therefore the ability to deliver affordable housing. Applicants should design schemes to ensure the most efficient and effective use of land, whilst being consistent with other policies in the JCS and GCP, for example in relation to design and heritage.

3.1.21 In exceptional circumstances where an applicant may be able to provide robust evidence to demonstrate an inability to meet the affordable housing requirement, evidence must be provided in the form of a viability appraisal. This will be independently assessed for the City Council by a third party and this will be paid for by the applicant. Clarity as to the particular circumstances that have given rise to the development's reduced viability or non-viability will be established through either an open book valuation or through an independently commissioned assessment using the Homes and Communities Agency 'Development Appraisal Tool' or other equivalent tools, to be agreed with the City Council in advance of the assessment.

3.1.22 Where it can be demonstrated through viability that a development cannot support the required 25% affordable housing, the applicant is expected to seek, in accordance with JCS Policy SD12, public funding or other public subsidy in order to support the required level of affordable housing. Equally, the applicant should consider the mix and design of a scheme (whilst according with other relevant policies in the JCS and GCP) in order to reduce costs and maximise the delivery of affordable housing.

3.1.23 The City Council will support schemes that deliver levels of affordable housing greater than 25%, through public subsidy or other mechanisms.

3.1.24 In some circumstances, vacant building credit may apply to developments that would bring vacant buildings on a site back into lawful use, or where such buildings are demolished as part of a development. If the site in question is eligible, this would reduce the expected affordable housing contribution from a site.

## **Policy A2: Houses in Multiple Occupation**

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>A2: Houses in Multiple Occupation</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b> <b><u>SD14: Health and Environmental Quality</u></b>

**Planning permission for the creation of a House in Multiple Occupation (HMOs) will be permitted where:**

- 1) The development would not result in any existing residential property (C3 use) being 'sandwiched' between two HMOs; and**
- 2) The development would not result in the creation of more than two adjacent properties in HMO use; and**
- 3) HMOs, including the proposed development, would represent no more than 10% of properties within a 100-metre radius of the application property.**

**4.1.19 HMOs are residential properties that were originally intended for a single household and have since been converted into a large HMO (Sui Generis) requiring planning permission.**

**4.1.20 Whilst HMOs can provide a valuable housing option for many, high concentrations can have a negative impact on the character of an area, and the amenities enjoyed by existing residents. To ensure an appropriate balance HMOs will be required to provide a suitable housing mix in accordance with SD11 Housing Mix and Standards of the JCS and accord with the other policies of the GCP.**

**4.1.21 The number of properties will be calculated using the Council's GIS (Geographic Information Systems) mapping software. Each property has a unique location point defined on the National Land and Property Gazetteer (NLPG) and the location point of the proposed HMO will be the centre of the 100m radius. The number of residential properties falling within the 100m radius of the proposed HMO will be assessed by totalling the location points falling within that defined radius. Properties that fall partly within the 100m radius will only be included if the location point, as depicted on the NLPG, falls within this buffer.**

**4.1.22 For the purpose of this approach, dwellings that are either within purpose-built blocks of flats, or within houses that have been sub-divided into separate flats, are all counted as one single property, and only the first address point is counted. This will avoid counts becoming 'skewed' by a high proportion of flats in one small area. Where a property is in mixed use, the first residential address point is counted.**

**4.1.23 In an area with an Article 4 Direction small HMOs (Use Class C4) will also be counted as intensified properties. Outside of an Article 4 direction, small HMOs will not be counted as intensified properties as they do not require the benefit of planning permission.**

Policy A3: Estate regeneration

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>A3: Estate regeneration</u>	<u>SD4: Design Requirements</u> <u>SD10: Residential Development</u> <u>SD11: Housing Mix and Standards</u> <u>SD14: Health and Environmental Quality</u> <u>INF3: Green Infrastructure</u> <u>INF4: Social and Community Infrastructure</u>

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

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

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

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

4.1.24 There are several former local authority housing developments in Gloucester of varying age. The City Council supports the regeneration of housing estates such as these where it can be demonstrated that the physical condition of this housing stock is considered not fit for purpose and alternative options have been robustly considered. Any redevelopment to provide new accommodation must meet the needs of existing and future residents and, as with all other planning applications, be compliant with other policies within the JCS and GCP.

4.1.25 These established housing areas often have existing assets both in terms of the built and natural environment, but also in terms of residents and the communities they have created. It is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods and the communities involved. The council would encourage the use of independent community advisors and



community builders throughout the process.

4.1.26 The redevelopment of affordable housing provides an opportunity to improve community infrastructure, health and wellbeing, and access to jobs and services.

4.1.27 The City Council has produced Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs provide additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications.

## Policy A4: Student accommodation

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A4: Student accommodation</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b> <b><u>SD14: Health and Environmental Quality</u></b>

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

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

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

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

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

4.1.28 There are several further education establishments in Gloucester City; namely the University of Gloucestershire, the University of the West of England and Gloucestershire Royal Hospital. Hartpury College and University is also located a short distance to the north of the

city.

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

## Policy A5: Specialist housing

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A5: Specialist housing</u></b>	<b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b> <b><u>SD12: Affordable Housing</u></b>

~~Development proposals for specialist housing must be~~ **Specialist housing developments will be permitted where they:**

1. **Are** supported by evidence of the demonstrable need for this form of housing within Gloucester City;
2. **Are** suitable for the intended occupiers in relation to the affordability, quality, design and type of facilities with, if appropriate, the provision of support and/or care ~~supported by a sustainable business model;~~
3. **Are** Accessible to local shops and services, public transport and community facilities appropriate to the needs of the intended occupiers; and
4. ~~In a location that avoids excessive concentration of such housing within any one street or small area.~~ **Will not lead to harm through over concentration in the local area, including but not limited to:**
  - a. **Levels of activity that cause excessive noise and disturbance to local residents**
  - b. **Excessive demand on social infrastructure, such as health and social care and police services**
  - c. **Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.**

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

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

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

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

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

- Hostel accommodation
- Accommodation for the homeless.

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

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

4.1.37 Older persons households, and disabled persons households often have a limited income. **Where the development falls within use class C3 (dwelling houses), the development will be expected to contribute to the supply of affordable housing within Gloucester.** Therefore, applications will need to demonstrate how the housing costs and related service charges are sustainable in relation to local earnings and incomes of the specific group for which the housing is designed. A scheme's eligibility to be treated as 'exempt accommodation' for Local Housing Allowance purposes is not an indication that the provision is affordable housing, merely that the residents housing costs are benefit supported. Consideration will need to be given to future needs of residents and whether benefit dependency undermines longer term personal development, care, or housing needs.

4.1.38 Given that specialist housing often provides housing for vulnerable persons, the safeguarding of their health and wellbeing is a key issue. Proposals will need to demonstrate that the landlord and service providers are either on a relevant procurement framework and/or can demonstrate that they are a fit and proper organisation to deliver the proposed scheme. ~~Legal agreement will allow for the substitution of landlords or service providers whose business model risks long term delivery of the housing or the support/services, or the management of the scheme or provision of support/services are deemed inadequate by the Council and /or Social /Health Care commissioners.~~

4.1.39 **Proposals should support the building of mixed and balanced communities and the over concentration of specialist housing in an area may lead to harm, for example through a significant adverse impact on the amenity of occupiers in the local area, and/or excessive demand on social infrastructure.**

## Policy A6: Accessible and adaptable homes

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A6: Accessible and adaptable homes</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b>



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

1. ~~50~~**25%** of housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) 'accessible and adaptable dwellings' to be met; and
2. 4 (four) % of the affordable housing component of every housing development should meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' ~~to be wheelchair accessible or be easily adapted for residents who are wheelchair users.~~

4.1.40 Accessible homes support the changing needs of residents from raising children through to mobility issues faced due to frailty, old age or through disability. The standards allow people to live independently maintaining their health and wellbeing for as much of their life as possible, either in their existing home or in alternative accommodation to meet their changing needs and aspiration within their neighbourhood or local area. This helps to promote safe, accessible environments that promote inclusion and community cohesion.

4.1.41 Homes built to M4 (2) standards have design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs or enable future adaptation to accommodate this diversity of use. **Developers are encouraged to provide M4(2) dwellings across all type and tenure to meet identified need in the city.**

4.1.42 **Homes built to M4(3) 2 (b) standard are sufficient to meet the needs of occupants who are wheelchair users.** The National Planning Practice Guidance states that local plan policies for wheelchair accessible homes (M4 (3)) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. In the interest of mixed and balanced communities, the Council would also encourage developers to build wheelchair accessible market homes, and Policy A7: Self build and custom build homes also supports provision of such homes. **4% of affordable homes should be wheelchair accessible to meet identified need on the City Council's Housing Register. Provision shall comprise of affordable rented homes to which the City Council will allocate households to.**

4.1.43 Evidence shows a significant need for accessible and adaptable homes in Gloucester during the GCP period to meet the needs of an ageing population and those with a disability. Habintec 'Towards accessible housing: A toolkit for planning policy', provides a methodology for calculating the number of wheelchair user households with unmet housing needs. To support this policy the toolkit has been applied and it demonstrates that 4% of affordable housing needs to be wheelchair accessible to meet unmet and future wheelchair housing need.

4.1.44 In terms of adaptable housing, an analysis has been undertaken to understand likely needs. It demonstrates an under-supply of existing homes and a future requirement for homes that meet this standard. Further information is available in the Housing Background Paper,

available to download from the City Council’s website.

- 4.1.45 ~~Developers of Specialist Housing may wish to increase the level of M4(3) category homes to reflect the needs of the intended occupants.~~ **In complying with this policy, developers, and in particular those delivering specialist housing, may wish to increase the proportion of properties which meet the higher M4 (2) and M4 (3) standards, including the provision of wheelchair accessible housing.**
- 4.1.46 Compliance with the criteria should be demonstrated in the Design and Access Statement submitted with the planning application and conditions will be applied to any consent granted to ensure the standards are complied with. **Exceptions will only be made where the applicant can clearly demonstrate why, given the particular site-specific circumstances of a development, the standards cannot be met. This could be, for example, where the structure of an existing building would preclude its conversion to housing in a manner consistent with the standards.**

## Policy A7: Self build and custom build homes

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A7: Self-build and custom build homes</u></b>	<b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b>

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

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

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

\* Excluding sites and applications for flats/apartments.

- 4.1.47 Self-build housing is where the individual or group has a high degree of autonomy and involvement in house design and construction. Custom-build housing involves an individual or a group commissioning specialist such as architects and/or builders to assist with the project.

- 4.1.48 The Self-Build and Custom Housebuilding Act 2015 requires the Council to keep, and have regard to, a register of people who have expressed an interest in self-build / custom build projects in the Local Authority area. Based on evidence of demand from the Self and Custom Build Register, the Act also requires the Council to put in place policies to support the delivery of planning permissions to meet the demand.
- 4.1.49 Developers are expected to liaise with the Council to ensure that plots available for self and or custom build are marketed to those on the register as well as to the general public. Further information to support this policy is provided in the Housing Background Paper, available to download from the City Council’s website.

### Policy A8: Static caravan sites

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A8: Static caravan sites</u></b>	<b><u>SD10: Residential Development</u></b> <b><u>SD11: Housing Mix and Standards</u></b>

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

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

### Policy A9: Extensions to existing dwellings

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>A9: Extensions to existing dwellings</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>SD10: Residential Development</u></b>

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

1. The plot size of the existing property is large enough to accommodate the extension or outbuilding without resulting in a cramped or overdeveloped site. Proposals that result in an inappropriate increase in the scale, form or footprint of the original building will not be permitted; and
2. The height, size, design and the external facing materials of the extension or outbuilding are in keeping with the scale and character of the existing dwelling and its wider setting; and
3. The living conditions of neighbouring occupiers are not unduly harmed by the proposal as a result of overlooking, overshadowing, or overbearing development.

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

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

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

## Policy A10: Annexes to existing dwellings

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>A10: Annexes to existing dwellings</u>	<u>SD4: Design Requirements</u> <u>SD10: Residential Development</u>



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

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

4.1.54 Residential annexes are a common form of development that allows a relative or dependent to live with their family. The accommodation is ancillary to the main dwelling and is sited within the residential curtilage. The resident of the annex should be clearly associated with the occupants of the principal dwelling house e.g. dependent relatives or domestic staff working for the residents of the principal dwelling. The annex should form part of the same “planning unit” by sharing the same access, parking area and garden.

4.1.55 The City Council will normally seek to add a planning condition to any permission to secure its continued use as an annex ancillary to the main dwelling. This is in order to avoid the development being later used by an unrelated occupant or as an independent dwelling.

4.1.56 Concerns can exist in respect of flood risk to vulnerable occupiers of ground floor annexes proposed in Flood Zones 2 and 3. Where there is no internal door linking an annex with the rest of an existing house a Flood Risk Assessment appropriate for a new dwelling will be needed to assess flood risk to occupiers of the annex.

# B: EMPLOYMENT DEVELOPMENT, CULTURE AND TOURISM

## Introduction and context

- 4.2.1 Gloucester has a strong a strong, diverse and growing economy, being the main economic driver in Gloucestershire, along with Cheltenham. Overall, the Gloucester economy supports 68,000 jobs and 3,425 businesses. Key sectors include manufacturing, energy, finance and insurance services and overall, the City has high rates of economic participation. Evidence shows that the city has a good range of different types of employment sites, supporting a diverse economy and with high occupancy rates.
- 4.2.2 Limited land supply within the administrative area of the City Council means that the strategic growth must take place in neighbouring authorities and the City Council must work with those authorities in realizing growth aspirations.
- 4.2.3 **Employment land is considered on a JCS-wide basis, providing** The JCS provided an employment strategy for the JCS and strategic land release at urban extensions, aligned with the Strategic Economic Plan (SEP). **Across the JCS area, through both strategic and non-strategic allocations, provision has been made for at least 192 hectares of traditional employment land. At the JCS examination, evidence was provided to demonstrate that there was a capacity of 7 ha of employment land in the city. The GCP allocates 8.1ha, either as 100% traditional employment or as part of wider mixed-use schemes. Together with recent commitments, such as those at King's Quarter, there is the opportunity for a substantial amount of floorspace to be delivered over the plan period.**
- 4.2.4 ~~That said,~~ The GCP plays its part in allocating sites for additional employment land, in whole or in part, at the following locations; SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King's Quarter; SA09 Quayside House; **and** SA17 Land South of Triangle Park; **and** SA21 Part of West Quay, The Docks; ~~and SA22 Land adjacent to Secunda Way Industrial Estate.~~ Further information is available in Section 4 of this plan – Site allocations.
- 4.2.5 **It is important that the city protects existing employment land and buildings for the benefit of existing and future business, including small and medium size business (SMEs) and 'start-ups', and that opportunities are taken to support business growth and the attractiveness of employment stock.** Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports ~~proposed~~ proposals to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council's website.
- 4.2.6 At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets including the Docks and Canal and develop with **their** tourist and cultural base.
- 4.2.7 These policies link with several key principles, but particularly (7) 'Encourage and facilitate inward and home-grown investment, attract innovative growth sectors, create high and stable levels of economic growth and increase jobs and skills opportunities' and (4) 'Build on

existing strengths to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer.’

- 4.2.8 The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the ~~designed~~ **designated** centres. It covers all designated ‘town centres’, i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.
- 4.2.9 The policies in this section should be read in conjunction with JCS policies SP1 ‘The need for new development’, SP2 ‘Distribution of new development’, SD1 ‘Employment – Except retail development’ and SD2 ‘Retail and City / Town centres’.

## Policy B1: Employment and skills plans

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>B1: Employment and skills plans</u></b>	<b><u>SD1: Employment – Except Retail Development</u></b>

For housing development of 10 or more units and major commercial development of 1,000 sq. m or more of new internal floorspace, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the proposal and identify opportunities for the employment and skills development of local people ~~through~~ **during** the ~~implementation~~ **construction and operational stages** of the proposal.

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

- 4.2.10 There is a need for a focused improvement in educational attainment and skills in Gloucester. In order for local people to get jobs it is obvious that they need the right education and skills in order to be aligned with the needs of employers. But employers also need to play their part in giving opportunities to suitably qualified people from the local area. In the long term it is not socially or environmentally sustainable for people to travel long distances to work so employers should be encouraged to recruit locally.
- 4.2.11 The Gloucester Economic Growth Strategy 2019 (EGS) takes a strategic approach to encouraging employment and skills development, seeking to;
- Enable more people to enter the labour market with the skills, knowledge and attitudes required to make them employable;
  - Develop a larger and more skilled workforce in line with local employer/labour market needs;
  - Increase the number of apprenticeships available; and
  - Help facilitate a reduction in the number of unemployed and economically inactive people of working age.

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

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

4.2.13 The ESP should address priorities identified **by relevant local industry groups, such as the Construction Industry Training Board (CITB)** and be agreed at an early stage through consultation with the City Council and local employment and skills agencies. The ESP ~~should~~ **will** have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development.

4.2.14 **The City Council will further support proposals within the ESP that seek to deliver the employment and skills aims of the EGS during the operational stage of the development.**

4.2.15 **The City Council will keep the effectiveness of the policy under review through regular dialogue with housebuilders and through liaison with the Gloucestershire Employment and Skills Board, which includes industry representatives alongside learning and skills providers.**

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

## Policy B2: Safeguarding employment sites and buildings

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>B2: Safeguarding employment sites and buildings</u></b>	<b><u>SD1: Employment – Except Retail Development</u></b>

Employment sites and buildings will be safeguarded for ~~B-class employment uses~~ **offices, research and development, light industrial, general industrial and storage and distribution**, and change of use/redevelopment to ~~non-B class~~ **other** uses will generally be resisted. Such proposals will only be supported where the following criteria are met:

- a. The site or premise is redundant or no longer fit for purpose or capable of meeting employment needs; ~~and~~ **or**
- b. **Alternative local employment facilities or an equivalent standard can be provided without adversely impacting on the operation of the existing business and its accessibility to existing employees; and**
- c. The proposal would not adversely impact on the continued use of adjacent employment uses; **and**
- d. The proposal would bring significant benefits to the local economy and/or community that would demonstrably outweigh the loss of employment land.



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

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

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>B3: New employment development and intensification and improvements to existing employment land</u></b>	<b><u>SD1: Employment – Except Retail Development</u></b> <b><u>SP2: The Need for New Development</u></b>

Development proposals for new ‘B’ class employment development, **offices, research and development, light industrial, general industrial, and storage and distribution**, and/or to improve the quality of accommodation, the environment and intensify the use of existing employment sites will be supported where the following criteria are met:

1. Any increase in traffic can be accommodated by the transport network; and
2. Satisfactory vehicular access, parking and maneuvering space can be provided; and

3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties **and it would not place unreasonable operational restrictions on adjacent existing or allocated land uses;** and
4. The scale and design of the proposal is compatible with the character of the location; and
5. It would not result in unacceptable adverse environmental impacts, ~~for example~~ in terms of noise, air, water, soil or light pollution; **and**
6. **Provision is made for the delivery of efficient and effective commercial wastecollection services.**

Proposals for limited ~~non-B class~~ **development outside these** uses will be supported where they are genuinely ancillary / complementary to the primary use of the site ~~for B class uses~~. Where such uses are defined as 'main town centres uses', they will be considered in the context of Adopted JCS Policy SD2 'Retail and City / Town Centres'.

- 4.2.22 Policy SP2 of the Adopted Joint Core Strategy (JCS) identifies a need for 192ha of new employment land across the JCS area. Gloucester is a small urban authority with a finite supply of land and therefore the opportunity to allocate land within the administrative area is limited. Most new employment land therefore has to come forward through the adopted JCS on strategic allocations outside of the City Council's administrative area. JCS Policy SD1 further supports employment development at locations allocated for employment development within Gloucester City and for the redevelopment of existing sites or the change of use from non-B class employment to B class where of an appropriate scale and character. This policy goes a step further in specifically supporting the intensification of existing employment sites where they meet set criteria.
- 4.2.23 The city's existing employment stock makes an important contribution to the economy of the city and the wider county and region and, in light of the above, it is fundamentally important that the very best use of made of existing employment stock, whilst ensuring the impacts of doing so are adequately considered and addressed.
- 4.2.24 The City Council's Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets **the needs** of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.
- 4.2.25 In some circumstances additional uses within employment areas can provide an important local service within employment areas. In order to maintain the primary function of B use class employment sites, these will be genuinely ancillary to and, where constituting 'main town centres uses', assessed in accordance with the sequential test and impact test.
- 4.2.26 **With regards to waste collection from employment sites the City and County Council wish to see high quality facilities which support the implementation of the waste hierarchy and encourage the practices of resource efficiency and waste reduction.**

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

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>B4: Development within and adjacent to Gloucester Docks and Canal</u></b>	<b><u>SD1: Employment – Except Retail Development</u></b> <b><u>SD2: Retail and City / Town Centres</u></b> <b><u>SD8: Historic Environment</u></b> <b><u>SD14: Health and Environmental Quality</u></b>

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

1. The development will not infill or reduce the depth of water of docks/canal waterspaces to the extent where it would limit the range of boats and other craft that could safely navigate and/or operate within the waterspaces; and
2. ~~The development would not adversely affect, and where possible enhances the historic built character, features and setting of the open waterspaces; and~~  
2. **Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness; and**
3. There will be no significant adverse impact on the ~~environmental~~ amenity of local residents, visitors, workers or other recreational users of the waterspace; and
4. The development will not adversely affect existing, and where possible makes appropriate provision for future management and maintenance of public realm, movement routes, waterspaces and quaysides, moorings or waterway infrastructure and utilities. Where appropriate, opportunities should be taken to improve or reinstate the canal towpath; and
5. **The development would not adversely affect the functioning of existing businesses; and**
6. Development provides net biodiversity gain and facilitates ~~its role as~~ **delivery of** multifunctional green and blue infrastructure (including water quality).

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

4.2.27 Gloucester Docks and the canal side is a major cultural and historic asset for the city, and already represents a major tourist attraction with the National Waterways Museum, Soldiers of Gloucestershire Museum and various festivals and events. **The docks are also home to both commercial and leisure moorings as well as other commercial uses, including a successful working boatyard which add heritage value and visual interest to both the dockside and waterspace.**

4.2.28 However, the waterspace is generally underutilized and represent an opportunity to attract further investment, generate footfall within the city centre and encourage physical activity

and improved health and wellbeing. The Canal and River Trust has prepared a Waterspace Strategy for Gloucester Docks, which aims to increase the recreational use of the Docks and canal, **whilst retaining and supporting existing uses.**

- 4.2.29 The whole of the Docks and part of the Gloucester & Sharpness canal is located within conservation areas, and within the main Docks basin, there are 14 Listed warehouses. Furthermore, the city’s successful regeneration programme over recent years has resulted in the creation of a new residential and business community within the docks and wider area. It is important that increased use of the waterspaces does not lead to a significant adverse impact on local amenity or lead to an erosion of the special historic character within the area.
- 4.2.30 It is also important that land-based development does not have an adverse impact on or prevent the use of the waterspace and that new water-based activities do not impede the use of the waterspaces by boats, water craft and vessels.
- 4.2.31 Development that could come forward to support greater use of waterspaces includes, but is not limited to, the following:
- Floating pontoons for canal boat mooring, boat hire, water taxis and buses;
  - The provision of utilities and services to the quayside edge to enable/facilitate recreational activity (and reduce the reliance on generators, petrol engines, dock vehicular traffic etc).
  - Installation of stepped dockside structures to gain access at water level;
  - Feature lighting installations that assist in animating the dock and quaysides (waterspaces should remain dark);
  - Proposals that enhance the interpretation of the cultural heritage and archaeology of the historic dockland environment; and
  - Water sports activities.
- 4.2.32 Applicants are encouraged to discuss proposals with the Canal and River Trust at the earliest possible opportunity.

## Policy B5: Tourism and culture

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>B5: Tourism and culture</u></b>	<b><u>SD2: Retail and City / Town Centres</u></b> <b><u>INF4: Social and Community Infrastructure</u></b>

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

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



- 4.2.33 Gloucester has a strong and unique culture and tourism offer, with Gloucester Cathedral, the Docks, over 700 Listed buildings, Roman heritage, Gloucester Rugby, thriving festivals and events, museums and cultural venues such as the Guildhall. At the same time, it is recognized that the city lags other cities and towns of a similar size or status. In response to this, the City Council and the Gloucester Culture Trust have ambitions to build on current strengths and develop and cultural and arts offer of the city further. **The Gloucester Cultural Strategy and Vision Update 2021 – 2026 sets out a range of objectives and actions that seek to embed culture into the city’s future plans, build cultural and creative industries, activities, festivals and events, and empower young people to participate in culture.** Further opportunity is identified in the City Council’s adopted Heritage Strategy (2019) in terms of the role that the historic environment can play in underpinning the delivery of quality places, tourism and culture.
- 4.2.34 The City Council will therefore support proposals that seek to deliver the tourism and cultural offer of the city. Applicants should have regard to other relevant policies in the adopted JCS and GCP, for example in relation to development affecting designated and non-designated heritage assets and accessibility for all.
- 4.2.35 Where a proposal is for a main town centre use outside of the city centre boundary, the applicant will need to apply the sequential test and impact test on accordance with the Joint Core Strategy.

## Policy B6: Protection of public houses

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>B6: Protection of public houses</u></b>	<b><u>SD2: Retail and City / Town Centres</u></b> <b><u>INF4: Social and Community Infrastructure</u></b>

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

1. All reasonable efforts have been made to keep the pub in viable use and it can be demonstrated that its continued use would not be feasible or practical. ~~or~~ **This will include:**
  - a) **The submission of a comprehensive sustained marketing campaign (agreed in advance by the Council), offering the public house for sale as a going concern and using an agreed realistic valuation of the premises;**
  - b) **The agreed marketing campaign will be run for a period of at least six months before the planning application is submitted;**
  - c) **The public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents; or**
2. There is an existing public house within a reasonable walking distance that meets the needs of the local community; or
3. A replacement public house **that meets the needs of the community** will be provided on part or all of the site, or within **reasonable** walking distance of the site.

4.2.36 Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence ~~to~~ from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use. ~~In order to satisfy the requirements of this policy, applicants will normally be expected to submit evidence demonstrating the following:~~

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

**4.2.37 To demonstrate that the alternative or proposed public house meets the needs of the local community evidence of extensive engagement will be required. As well as seeking the views of the community on their needs and the suitability of alternative or proposed provision, the community consultation shall also make the community aware of community ownership initiatives.**

# C: HEALTHY COMMUNITIES

## Introduction and context

4.3.1 Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle ~~14~~ **12** of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities.

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

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

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

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

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

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

4.3.6 The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices. More widely, the GCP supports the creation of healthier communities. This is reflected in many other policies, for example those relating to heritage, good design and creating a sense of place in new development, the delivery of new homes that meet the needs of communities and sustainable transport.

### Policy C1: Active design and accessibility

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
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Development proposals must ~~clearly demonstrate~~ **meet the highest possible standards of accessible and inclusive design, by meeting the following principles:**

- ~~1. A layout that fully accords with the principles of Active Design outlined by Sport England, or any future iteration:~~
- ~~2. The proposal meets the highest possible standards of accessible and inclusive design, meeting the following principles:~~
  1. The development can be used safely, easily and with dignity by all regardless of ability, age, gender, ethnicity or economic circumstances; and
  2. The development is convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment; **and**
  3. **The development will support healthy active lifestyles by facilitating participation in physical activity by incorporating the following active by design principles:**
    - a) **Connected Communities - Creating the conditions for active travel between all locations within the development and to the wider local shops, services, built and natural surroundings.**
    - b) **Connected walking, running, and cycling routes - Prioritising active travel through safe integrated walking, running and cycling routes separate from vehicular activity. Connect to existing cycle networks where they exist. Keeping routes direct to make them convenient to use.**
    - c) **Co-location of community facilities – Locate new facilities in the best location for those walking, cycling or using public transport. Co-locating facilities can create multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in active travel.**
    - d) **Network of multifunctional open space - Providing multifunctional spaces opens opportunities for sport and physical activity and has numerous wider benefits. Sustainable drainage schemes, and the green infrastructure network can be used to connect open spaces and contribute to creating an attractive network of routes and spaces.**
    - e) **High quality streets and spaces - Create a network of streets and spaces that are well enclosed by buildings and/or structural landscaping, taking care to ensure that front doors and the principal facades of buildings face streets and public spaces. Well-designed streets and spaces support and sustain a broader variety of users and community activities. Buildings that provide active frontages to the public realm encouraging natural surveillance and increased activity.**
    - f) **Legible places – Create a clear hierarchy of principal and secondary streets to help people find their way around rather than character areas. Use different spatial characteristics, building typologies, building to street relationships, landscape strategies and boundary treatments to differentiate between principal and secondary streets. Include navigable features and**



**frame views of features on or beyond the site. Avoid disorientating curvilinear street patterns.**

**g) Appropriate infrastructure - Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.**

4.3.7 The location, accessibility, layout and design of developments have the potential to either positively or negatively impact on the extent to which people can make healthy choices and lead active lives.

4.3.8 Cycling and walking is often more cost effective and therefore brings opportunities for access and inclusion across a wider number of income groups. Gloucester is a relatively flat and compact city making it ideal for walking and cycling. Applicants will be expected to maximise all viable options to improve the opportunities for walking and cycling in and around proposed developments.

4.3.9 Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking ~~or~~ **and** cycling. Developers **should have regard to will** ~~be required to demonstrate how their proposals accord with the 10 Principles of Active Design outlined by Sport England in “Active Design: Planning for Health and Wellbeing through Sport and Physical Activity”, ‘Building for a Healthy Life’ (Birkbeck, D., Kruczkowski, S. with Jones, P., McGlynn, S. and Singleton, D. June 2020),~~ or any future iteration, **in developing proposals.**

~~3.3.10 Cycle parking, cycle storage, accessibility and walking distances shall meet the guidance provided in Manual for Gloucestershire Streets and any subsequent amendments from the Highways Authority.~~

4.3.10 Good design should reflect the diversity of people who use it and not impose unnecessary barriers of any kind. People of all ages, genders, ethnicity, economic circumstance, those with both physical and learning disabilities in our community should be able to access, **use** and feel safe in all new developments. This includes extensions to all public buildings and the design and layout of public open spaces and playgrounds.

## Policy C2: Allotments

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>C2: Allotments</u></b>	<b><u>INF3: Green Infrastructure</u></b> <b><u>INF4: Social and Community Infrastructure</u></b>

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

Provision of new allotments will be supported where they would meet identified need within a community.

- 4.3.11 Gloucester is a small urban authority with an increasing population and finite land supply. Allotments are an incredibly important resource, supporting local food growth, physical activity and health and wellbeing. Within the city there are public allotments sites which collectively provide 652 individual allotments on 16 hectares of land. At the time of writing, there are waiting lists for all of the allotment sites. It is therefore important to protect against the loss of city’s existing allotments sites.
- 4.3.12 Opportunities for new allotments are limited, however where demand arises and the proposal is in a suitable location to meet that demand, they will be supported by the City Council.

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

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>C3: Public open space, playing fields and sports facilities</u></b>	<b><u>INF3: Green Infrastructure</u></b> <b><u>INF4: Social and Community Infrastructure</u></b> <b><u>INF7: Development Contributions</u></b>

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

1. **For public open spaces, an assessment demonstrates the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide.**
2. **For playing fields and sports facilities, an assessment demonstrates** there is an excess of provision in the local area, there is no current or planned future demand for such provision, **or** that there would be no overall shortfall **in provision.**

If the criteria above cannot be met:

3. The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; **or**
4. The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; **or**
5. The proposal affects land that is not suitable, or **is** incapable, of forming an effective part of **the an** open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.

The need for **New open space, and playing fields and built sports facilities** within new development will be ~~determined~~ **provided** in accordance with **to meet the needs of the local area** aims and recommendations of the City Council’s Open Space Strategy and Playing Pitch Strategy.

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

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

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

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

4.3.15 Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.

4.3.16 Policy INF4 of the Joint Core Strategy sets out that where new residential development will create, or add to, a need for community facilities, including open space, it should be met as on-site provision and/or as a contribution to facilities or services off-site. In satisfying this requirement, applicants should have regard to the aims and recommendations of the strategies identified in the paragraph above. Normally, new on-site open space will be expected on sites of 35 homes or greater.

4.3.17 To achieve this, the site allocations within this plan identify specific opportunities for new provision where there is a shortfall in quantity, quality and accessibility, namely;

- Land rear of St Oswalds Retail Park;
- Land at Great Western Road Sidings; and
- Land at The Wheatridge (should it come forward for residential development)

4.3.18 Furthermore, site allocation SA06 allocates land at 'Blackbridge' in Podsmead for a sports and community hub. This forms a key part of the Council's Playing Pitch Strategy, which seeks the delivery of two multi-functional sports hubs in Gloucester; one in the north and one in the south of the city. The northern hub, located at Oxstalls Sports Park and the University of Gloucestershire, was complete in 2018.

**4.3.19 The Council has set out in its adopted Open Space Strategy (OSS), Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BSFS), the needs of the local area both in terms of the provision and the necessary enhancements required to improve the provision. These documents, or any future iterations, provide the detailed background evidence to support the**

delivery of the Council’s aims and recommendations for new and enhanced open space, playing pitches, and built sports facilities.

**4.3.20 The Council’s strategies also provide an assessment of the public open spaces, playing pitches and built sports facilities within the local area. These approved assessments, or any future update them, will be used when assessing criterion 1 and 2 of this policy. It is recommended that the scope and methodology of any third-party assessments are approved in advance.**

4.3.21 The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that ~~aren’t~~ **are not** shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these includes sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.

~~3.3.20 Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.~~

## Policy C4: Hot food takeaways

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>C4: Hot food takeaways</u></b>	<b><u>SD14: Health and Environmental Quality</u></b>

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

1. The design of the unit, including its ventilation and bin storage would not have a significant adverse impact on the visual amenity of the area; and
2. There would not be a significant adverse impact on the amenities of occupants of neighbouring **nearby** properties ~~within a reasonable distance of the proposed location~~ in terms of noise, traffic disturbance, odour, litter, light or hours of operation; and
3. There would not be an **unacceptable** severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues; and
4. The proposal incorporates adequate waste storage and disposal facilities; and
5. There should be a minimum of two **non-hot food takeaway units** ~~non-A5 units~~, or at least 10 metres, between the units, whichever is greater.
6. Outside of the city centre, district centres and local centres, that the proposal is not within 400 metres of **any access to** a secondary school or college.

4.3.22 Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.



- 4.3.23 Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2018/19 25.9% of 4 – 5 year olds and 36.9% of 10 – 11 years olds in Gloucester City are an excess weight (overweight or obese). These figures are significantly higher than national and county averages. Furthermore, 5.4% of 10 – 11 year olds are affected by severe obesity and this level is one of the highest in the South West region. Reducing obesity, particularly among children, is one of the priorities of (PHE and the government’s ‘Childhood Obesity Plan’). Being overweight increases a person’s risk of developing cancer, heart disease and type 2 diabetes.
- 4.3.24 To help tackle childhood obesity through supporting healthy behaviours, hot food takeaways will not be permitted within 400 metres of **any access to** secondary schools or colleges. Primary schools have been excluded as children in this age group are normally restricted from leaving the school premises at breaktimes.
- 4.3.25 The policy also aims to control the clustering of hot food take-aways in order to retain a balanced mix of shops and services within local centres and to preserve the amenity of the local environment by controlling the noise, smells and general disturbance generated from the use.
- 4.3.26 Hot food takeaways can often generate significant levels of local litter and waste. The Council will expect efficient and effective commercial waste collection services that support the implementation of the waste hierarchy and encourage resource efficiency and waste reduction.

## Policy C5: Air quality

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>C5: Air quality</u></b>	<b><u>SD14: Health and Environmental Quality</u></b>

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

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

Within the city’s Air Quality Management Areas (AQMAS) and in areas near schools and hospitals, development which reduces tree cover, hedges and other forms of vegetation will be expected to make provision for a net gain in vegetation onsite and/or within the

relevant buffer zone. The use of green roofs and walls in these areas will be strongly supported along with other suitable measures to increase vegetative cover.

- 4.3.27 Air pollution is a major threat to the health and wellbeing of people living in urban settings. In the UK it has been estimated that the mortality burden of long-term exposure to particulate matter (PM2.5) in 2008 was equivalent to nearly 29,000 premature deaths in those aged 30 or older. The Public Health Outcomes Framework data tool shows the fraction of mortality attributable to air pollution by local authority (range 2.7 - 8.3%, average for England 5.4%). It is likely that removing exposure to all PM2.5 would have a bigger impact on life expectancy in England and Wales than eliminating passive smoking or road traffic accidents. The economic cost from the impacts of air pollution in the UK is estimated at £9-19 billion every year which is comparable to the economic cost of obesity (over £10 billion). In 2013, the International Agency for Research on Cancer has identified outdoor air pollution as causing lung cancer, without identifying the specific pollutants that are the carcinogenic component.
- 4.3.28 Local authorities have a wide remit and their responsibilities touch on many aspects of our lives. To achieve their objectives, they need to draw on many different resources, some statutory, and some that rely on cooperation with others. Good air quality is one such objective, where many players can affect the outcome through actions taken in different places and sometimes over long periods of time as one development succeeds another.
- 4.3.29 Determining one application in isolation may not achieve good air quality on its own. This is often achieved through many decisions made in different circumstances guided by a mosaic of policies that implemented together will create better air quality. Gloucester City Council currently has three Air Quality Management Areas (AQMA's) as identified by breaches of the average annual mean action levels. The M5 motorway also runs along the eastern edge of the city and creates impacts in terms of air and noise pollution.

#### Mitigating impacts through planting

- 4.3.30 There is evidence that increased urban vegetation can help to reduce the impacts of air pollution, but distinction should be made between reductions in concentrations of particulate matter and gaseous pollutants. In terms of gases, certain types of vegetation can remove small amounts of pollutants from urban air by deposition, but in terms of particulate matter, the planting of trees can redistribute particulates but not remove them. However reduced air temperature as a result of tree planting is believed to improve air quality because emissions of many pollutants and/or ozone-forming chemicals are temperature dependent - <https://laqm.defra.gov.uk/laqm-faqs/faq105.html>
- 4.3.31 In terms of trees, it is important to note that the level of effectiveness of any planting will depend on the season, the number of trees, the species, the siting, the canopy density and the prevailing wind direction in the particular street. NPPF Paragraph 81 186 states that in tackling air pollution green infrastructure provision and enhancement should be considered along with other initiatives.
- 4.3.32 AQMAs have been targeted for action for obvious reasons but the policy also targets areas around the city's schools and hospitals. This is due to the fact that these areas generally have high levels of vehicular traffic combined with the congregation of large numbers of people who are particularly vulnerable to air pollution. Close proximity in the context of this

policy means within 50 m of the site boundary identified in the buffer zones on the policies map.

## Policy C6: Cordon Sanitaire – Netheridge Sewage Treatment Works

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>C6: Cordon Sanitaire: Netheridge Sewage Treatment Works</u>	<u>SD14: Health and Environmental Quality Gloucestershire Waste Core Strategy 2012</u> <u>– 2027: Core Policy WCS11 – Safeguarding Sites for Waste Management</u>

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

**Planning permission will be granted for development within the Cordon Sanitaire, as shown on the policies map, where it can be clearly demonstrated through a robust odour assessment that:**

- 1. The users/occupants of the proposed development will not be adversely affected by odour nuisance; and**
- 2. The introduction of the proposed use will not adversely affect the continued operation of the Netheridge Sewage Treatment Works.**

4.3.33 Severn Trent Water PLC (Severn Trent) is responsible for sewerage and sewage disposal. They operate Netheridge Sewage Treatment Works (NSTW) south of Hempsted, a facility that processes a significant amount of waste from Gloucester City and beyond. The fields adjoining Netheridge are used for sludge disposal that, in addition to the works itself, create unavoidable smell problems within the area. In order to reasonably prevent development that would be adversely affected by smell, a cordon sanitaire area is shown on the proposals map within which development will not be permitted **which is a strategic regional/subregional waste facility, processing permitted and non-permitted waste, for sewerage/sludge, domestic waste and trade waste. In order to prevent development that would be subject to odour nuisance and to prevent unreasonable constraints on the operation of NSTW, a Cordon Sanitaire is shown on the policies map. Development within the Cordon Sanitaire will not be permitted unless it can be shown that odour nuisance risk is negligible to future occupiers of that development.**

4.3.34 NSTW is identified in the Gloucestershire Waste Core Strategy 2012 under Core Policy WCS11 ‘**Safeguarding Site for Waste Management**’, which states:

**‘Existing and allocated sites for waste management use will normally be safeguarded by local planning authorities who must consult the Waste Planning Authority where there is likely to be incompatibility between land uses. Proposals that would adversely affect, or be affected**

**by, waste management uses will not be permitted unless it can be satisfactorily demonstrated by the applicant that there would be no conflict.**

**The Waste Planning Authority will oppose proposals for development that would prejudice the use of the site for waste management.'**

4.3.35 To support this Policy **C6**, an assessment of odour nuisance arising from NSTW has been undertaken and has informed the boundary on the policies map. ~~The study is informed by a review of odour complains, odour surveys, a detailed dispersion model assessment and a review of a previous model assessment.~~ Severn Trent were engaged in the review process in order to understand currently and future operations, including plans for any proposed future infrastructure improvements to accommodate additional waste and/or to reduce the impact of odour on the surrounding area. ~~It categorises likely odour nuisance on the basis of odour contours from the sewage works.~~

~~4.3.35 The extent of the cordon sanitaire has been drawn on the basis the area most likely to be affected by odour nuisance, within the 3 – 5 odour contour area. This boundary does not represent the absolute limit of the area where smells can be detected but is drawn so as not unreasonably to constrain development in the existing built-up area.~~

**4.3.36 The Cordon Sanitaire is necessarily conservative as there is uncertainty as to how odorous emissions from NSTW might alter over the plan period –for example from the intensification of waste facilities at the site due to new development and/or from the closure of nearby facilities, or from a reduction in odour emissions as plant at NSTW might be replaced with new technology.**

**4.3.37 If development is proposed within the Cordon Sanitaire, whose occupants/users are likely to be sensitive to odours from NSTW, then applicants will be required to undertake appropriate assessments to show that odour nuisance would not occur, or the new use pose a risk to NSTW's operation.**

**4.3.38 Without Policy C6, an increase in nuisance impacts on new development within the Cordon Sanitaire could unduly prejudice NSTW's operation, requiring it to pursue changes to its operation that would entail excessive cost; which would be contrary to Core Policy WCS11.**

**4.3.39 Development proposed within the Cordon Sanitaire must be supported by an appropriate odour assessment in line with the Institute of Air Quality Management (IAQM) guidance. Planning applications for residential development and similarly sensitive uses must be supported by comprehensive and detailed odour dispersion modelling, and appropriate source monitoring and ground-based observations. It is strongly advised that the scope of any such odour assessment is agreed with the City Council in advance.**

## Policy C7: Fall prevention from taller buildings

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>C7: Fall prevention from taller buildings</u></b>	<b><u>SD4: Design Requirements</u></b>



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

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

- 4.3.40 Suicide is a national and local health priority. In Gloucestershire suicide kills approximately 60-67 people a year. When compared to deaths from road traffic accidents, which were 29 in 2014, suicide is responsible for twice as many deaths. During a six-month period in 2019 Gloucestershire Constabulary dealt with 67 incidents of people attempting or threatening to attempt to jump from tall buildings across the city. Whilst not all suicides and attempted suicides can be prevented through mitigation measures in the urban environment, it is the Council’s responsibility to do all that in can to keep people safe. In planning terms, a simple thing that can be done is to make sure that where there is public access to tall buildings, that these buildings are designed in a way that restricts the access or the possibility of jumping or falling from the upper floors. This accords with the government’s objective to reduce access to the means of suicide.
- 4.3.41 Retrofitting schemes can be expensive, cumbersome and poorly designed, as such it is considered appropriate to deal with this issue from the outset to ensure safe and well-designed buildings. It is known that falls from more than four storeys are more likely to result in life changing injuries or death. Falls can occur accidentally, through misadventure or suicide. The average floor to floor height for an office building is 3.9 meters per storey. Residential buildings tend to have floor to floor heights of about 3.1 meters. Therefore, where buildings or structures are proposed above 12 metres developers will be required to provide a statement within the Design and Access Statement outlining how they have considered this policy.
- 4.3.42 The statement should outline what public access there will be to any roof, open element, or structure above 12 metres and what measures will be integrated into the design of the building to reduce the opportunities for suicide and falls. This could be as simple as ensuring that there is no public access to roof top spaces or designing out open sides above 12 metres on a car park for example. Where public access to an open roof top or element is possible, over 12 metres, suitable well-designed suicide prevention measures will be required to be incorporated into the design of the building. These will be subtle and cohesive to the architectural design.
- 4.3.43 Further guidance can be found in ‘Preventing suicides in public places; A practice resource’ published by Public Health England.

## Policy C8: Changing Places Toilets

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>C8: Changing Places Toilets</u></b>	<b><u>SD4: Design Requirements</u></b>

Where possible appropriate, **major non-residential developments and minor developments for community, cultural, leisure and sport and civic uses where a new or refurbished public toilet or changing facility is proposed, shall include a fully accessible and equipped toilet** applications for retail, sports venues, cultural and leisure developments that propose to provide toilets will provide at least one toilet to the 'Changing Places' standard.

- 4.3.44 The NPPF requires local planning authorities to put in place policies that create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.
- 4.3.45 People with profound and multiple learning disabilities, as well as other disabilities that limit mobility, cannot often use standard accessible toilets. People may be limited in their own mobility and require equipment to help them, or the space to have support from one or more carers. Standard accessible toilets (or "disabled toilets") do not allow for both right-hand and left-hand side transfers, provide changing benches or hoists and most are too small to accommodate more than one person. Without ~~Changing Places~~ **fully accessible and equipped** toilets, the user is put at risk, and carers are forced to risk their own health and safety by changing their loved one on a toilet floor. This is potentially dangerous, unhygienic and undignified. Everyone has a right to live in the community, to move around within it and access all its facilities. For some people the lack of a fully accessible toilet is denying them this right.
- 4.3.46 At present, none of the public toilets in the city ~~meet this standard~~ **are fully accessible**, although a 'Changing Places' toilet is proposed within the refurbishment of Kings Walk Shopping Centre. The City Council will actively encourage developers to provide enhanced accessible toilets within schemes. This is considered especially important for those uses that are accessed by the public. This ~~reduces the~~ **will help to improve the** accessibility of the city and its enjoyment for some of our residents and visitors. The Council endorsed the use of "Changing Places: the practical guide" which can be found at [http://www.changing-places.org/install\\_a\\_toilet.aspx](http://www.changing-places.org/install_a_toilet.aspx).
- 4.3.47 **A fully accessible and equipped toilet includes space for two carers to change an adult with all of the necessary equipment required to do this with ease and in comfort.**

## D: HISTORIC ENVIRONMENT

### Introduction and context

- 4.4.1 Gloucester has a unique and rich heritage formed by historic buildings, street patterns, archaeological remains, landscape and other physical remnants of its past. A city of intense urban activity for nearly two thousand years, it has a special legacy of nationally significant heritage from all historic periods. Gloucester's heritage is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. This has wide reaching implications on the image of the city, the economy, tourism, legibility and the health and wellbeing of the city's residents.
- 4.4.2 The historic environment, consisting of archaeological remains, historic buildings, townscapes and landscapes, including locally significant assets and their settings in addition to designated and statutorily protected features, will be valued, protected, preserved, enhanced and managed for its contribution to character, local distinctiveness and sustainability. New development should seek to safeguard, and where possible enhance, heritage assets and their settings. Development will be required to respect and respond positively to designated heritage assets and their settings, avoiding loss or harm to their significance. Proposals that involve securing a viable future use or improvement to an asset on the Heritage at Risk register will be supported.

#### Gloucester Heritage Strategy

- 4.4.3 The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to live, work, visit and invest. It also provides volunteer opportunities and helps foster local identity and pride.
- 4.4.4 The overall aim of the HS is 'To achieve effective and sustainable conservation, regeneration and management of Gloucester's heritage, so as to fully realise its economic, community and cultural potential.' It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.
- 4.4.5 The HS was delivered through the Great Place scheme, funded by the Heritage Fund and Arts Council England. The Great Place scheme places a strategic focus on enhancing Gloucester's heritage for all and embeds a culture of developing an holistic approach to the regeneration of the city centre through the development of a heritage strategy which will in turn aid proactive working with developers, members, stakeholders and partners, whether professional or residents of the City over the next ten years and beyond.
- 4.4.6 Heritage is a key component in the effective delivery of sustainable growth. It contributes to the creation of a competitive City Centre, support for the diverse needs of local communities, and the creation and maintenance of a high quality and sustainable environment. The historic environment is an integral part of the wider regeneration, economic development, tourism and cultural aspirations of the City of Gloucester.

- 4.4.7 A background document has been created which informs the Gloucester Heritage Strategy 2019-29 titled "Gloucester Heritage Strategy Background Document - Evidence, Analysis, Engagement". It comprises an evidence base and summary of stakeholder engagement and provides the foundation on which the strategy has been formulated. In addition to being the evidence base for the heritage strategy, it provides evidence for the Gloucester City Local Plan and includes evidence and analysis of Gloucester's heritage resources, including the nature of the resource, economic value and key issues. Analysis of key projects and development involving or affecting Gloucester's heritage, with a particular focus on design quality and economic impact. An overview of other local plans and strategies relevant to heritage. A summary of the outcomes of stakeholder and community engagement. Details of local stakeholders from across the sectors and a section on possible funding sources.
- 4.4.8 The Heritage Strategy has been written as a collaboration between local and national heritage organisations, including the City Council, Gloucester Civic Trust, Gloucester Historic Buildings Trust, Gloucester Heritage Forum and Historic England. The delivery of the key actions will require collaboration and close working between those partners to draw upon each other's strengths and to attract the necessary resources to maximise the 10-year vision the strategy puts forward.

#### High Street Heritage Action Zone – Cathedral Quarter

- 4.4.9 The City Council has also been successful in achieving High Street Heritage Action Zone (HSHAZ) status for the Cathedral Quarter, located around Westgate Street. Westgate is one of the oldest and best-preserved areas of Gloucester and the main commercial route linking the cathedral to the rest of the city. One of four original Roman routes, Westgate links the spectacular medieval cathedral to the rest of the city. Its array of stunning historic buildings includes the 15th century timber-framed Fleece Inn and Antiques centre, both of which are on Historic England's Heritage at Risk register. Despite its strong historic character, proximity to the cathedral and good location, Westgate Street is underperforming. Westgate's retail environment has changed dramatically in recent years. It once had a strong mix of independent businesses whose owners embraced the street's historic buildings, but many have moved on and prospective new owners feel the properties are expensive to run and difficult to convert. The street scene is tired, with poor paving, inconsistent signage, and general clutter. Many retail units stand vacant. Locals perceive the area in a negative light and of the thousands of visitors to the cathedral, few are attracted into Westgate Street.
- 4.4.10 The Heritage Action Zone will capitalise on Westgate's untapped potential and boost the number of people living, working and taking pride in the area. The award of up to £1.9m to Gloucester City Council will invest in Westgate Street's beautiful historic buildings, repairing buildings and historic shopfronts and converting vacant upper floors for new uses. There will be advice and support for businesses in historic properties, and the streetscape will be improved with new signage and branding. The area will be vibrant with cultural activities, from community archaeology to performing arts, and will become known for its attractive evening and night-time offer. The Heritage Action Zone will help Westgate thrive again by bringing a modern business approach to an outstanding historic environment.
- 4.4.11 The JCS and GCP have a strong role in delivering the aims and objectives of the HS and Cathedral Quarter HZAZ. The policies that follow in this section quite obviously have a direct link in that they seek to conserve and enhance the historic environment. However, the HS is a golden thread that has informed and will be delivered by different policies, including for example Policy A1, which supports the reuse of vacant floors above commercial units to

support the reuse of historic buildings and repopulation of the city centre. There are also important implications for some of the site allocations, particularly SA08 King’s Quarter, SA10 Former Fleece Hotel & Longsmith Street Car Park and SA21 Park of West Quay, The Docks.

- 4.4.12 Given the importance of heritage and the benefits it can bring to the economy, the following policies meet several of the of the GCP key principles. Of note is (3) in relation to heritage and regeneration, (4) in building on existing strengths to create a diverse and innovative cultural, tourism, arts and sporting offer and (9) which seeks protect and enhance environmental assets.
- 4.4.13 A Townscape Character Assessment (TCA) has been undertaken for every part of the City. The TCA identifies the morphology of Gloucester identifying form and origins, building types, past and present uses, trees and greenspaces, grain, density and plot coverage, and architectural qualities including periods, detailing and materials and colour palettes for each character area. The TCA can be used to inform an understanding of character and local distinctiveness.
- 4.4.14 The Public Realm Strategy SPD provides further guidance relating to the high-quality design of streets, squares, parks, green spaces and other outdoor spaces required in the historic core of the City.
- 4.4.15 This policy should be read in conjunction with Policy SD8 ‘Historic Environment’ of the JCS.

## Policy D1: Historic environment

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>D1: Historic environment</u>	<u>SD8: Historic Environment</u>

Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:

1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and
2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and
3. The proposed use of the heritage asset is compatible with ~~the preservation~~ **sustaining** or **enhancement** of its significance; and
4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and
5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and
6. Retains important views into or out of the Conservation Area.



**Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.**

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

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

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

4.4.19 Equally the preservation of archaeological remains, especially those of the highest significance, is an objective of the NPPF. Preserving archaeological remains in-situ, rather than excavating them is also more economically viable and represents a more sustainable approach for the city (Preserving Archaeological Remains Decision-taking for Sites under Development, Historic England 2016).

Describing the significance of heritage assets

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

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

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

- Applications should be supported by a description of the asset's historic, architectural and archaeological significance with an appropriate level of detail relating to the likely impact of the proposal on that interest. A site analysis identifying the qualities which contribute to local character, including development patterns, history, its landscape and views, and how these can contribute to the quality and sustainability of the proposed development should also be provided. An assessment of the character of the local area with reference to the adopted conservation area appraisal and management recommendations should also be included where necessary. This may include:
  - Built heritage assessment;
  - Assessment of significance;
  - Character appraisal and photomontages; and
  - Setting assessment; and an impact assessment.

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

## Policy D2: Non-designated heritage assets

<b>Gloucester City Plan policy</b>	<b>Other Development Plan policy</b>
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<b><u>D2: Non-designated heritage assets</u></b>	<b><u>SD8: Historic Environment</u></b>

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

**Development affecting a non-designated heritage asset, or its setting, should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered.**

**Development proposals should:**

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

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

4.4.22 A building or monument which is identified as being of national importance for its 'special architectural or historic interest' are known as statutory Listed Buildings or scheduled monuments and are given special protection by law. There are, however, many heritage assets (for example buildings, structures, monuments, landscapes and spaces) which, while not satisfying the national criteria, have strong local interest or appearance and contribute significantly to the distinctive character of Gloucester's Historic Environment. These are identified as non-designated heritage assets. All archaeological remains should be considered as non-designated heritage assets.

4.4.23 Gloucester City Council is in the process of creating a Local List of non-designated heritage assets, using a criteria for the identification of undesignated heritage assets.

4.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future **the** Local List.

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

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>D3: Recording and advancing understanding of heritage assets</u></b>	<b><u>SD8: Historic Environment</u></b>

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

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

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

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

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

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

## Policy D54: Views of the Cathedral and historic places of worship

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>D4: Views of the Cathedral and historic places of worship</u>	<u>SD8: Historic Environment</u>

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

4.4.28 Views of key historic landmark buildings act as way finders and improve the legibility of the city. They also contribute to the city's identity and sense of place. They make Gloucester unique and are a special distinctive part of the skyline. Further guidance is available in the City Council's 'Heights of Buildings' Supplementary Planning Document or any future iteration.



## E: NATURAL ENVIRONMENT

### Introduction and context

- 4.5.1 The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25-year plan to improve the environment' which set several challenging targets. In May 2019, the UK parliament declared a climate and ecological emergency. In June 2019 the Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this. At the strategic level, the JCS includes policies SD6 'Landscape', SD9 'Biodiversity and Geodiversity', INF2 'Flood Risk Management' and INF3 'Green Infrastructure'.
- 4.5.2 At a local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. In July 2019, the City Council declared a climate emergency, committing to make the city carbon neutral by 2050 and the Council's activities by 2030. All the policies aim, directly or indirectly, to address climate change. With effective implementation on the ground, these policies will make a difference locally even if the results seem small when weighed against the global climate change scenario. There is a push to protect our most valued natural environments and species and to green our urban neighbourhoods with more trees and more green roofs/walls. In doing this we cool the city, create more attractive places, encourage wildlife and tackle air pollution and associated health problems. The plan seeks better quality green/**blue** infrastructure in Gloucester and areas where nature can recover and thrive.
- 4.5.3 **Part of the area covered by the Gloucester City Plan lies within the South West Marine Planarea. Decisions on any development likely to affect this area should take the South West Marine Plan, and the Marine Policy Statement, into account in accordance with s58 of the Marine and Coastal Access Act. The Marine Management Organisation (MMO) should be consulted as appropriate. Also see the requirement in the supporting text for Policy E7 'Renewable energy potential of the River Severn and canal'.**
- 4.5.4 The NPPF strongly promotes the concept of 'biodiversity net gain' through development. This is specifically reflected in Policy E2 and several other policies in the plan.
- 4.5.5 Gloucester is at risk of serious flooding and this situation will be exacerbated as the climate changes. Policy E6 is detailed and robust and has been written on the basis of collaboration and the latest advice from the Environment Agency and Severn Trent Water.

### ~~Policy E1: Landscape character and sensitivity~~

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

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

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

3.5.6 This policy has clear links to JCS Policy SD6 Landscape and the associated evidence base namely the report: Landscape Characterisation Assessment and Sensitivity Analysis. This evidence focused the sensitivity analysis on the fringes of the city but excluded those within the urban area.

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

## Policy E21: Biodiversity and geodiversity

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>E1: Biodiversity and geodiversity</b>	<b>SD9: Biodiversity and Geodiversity</b>

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

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

### 1. Internationally designated sites:

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

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

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

### 2. Nationally designated sites:

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

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

3. Locally designated sites:

Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:

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

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

- 4.5.6 Gloucester is a growing and regenerating city, but this need not be at the expense of protected and valued geodiversity and biodiversity. Open natural areas in and around the city, even those that are seemingly small or obscure, play an important role in supporting wildlife of many varieties and form part of a wider ecological network. Enhancing biodiversity can also lead to significant reductions in various forms of pollution and positive impacts for health and wellbeing.
- 4.5.7 In accordance with the NPPF, the City Council seeks to protect and enhance the ecological network, improving the biodiversity of sites by achieving net biodiversity gains from development. Developers should demonstrably follow the mitigation hierarchy, which should be designed to maintain and, where possible, improve the connectivity of the network. ~~The appropriate type and level of provision will be a matter for the City Council in consultation with bodies such as the Local Nature Partnership (LNP).~~
- 4.5.8 The NPPF states that local wildlife-rich habitats and wider ecological networks should be mapped and taken account of through the planning process. The LNP are in the process of mapping the ecological network for Gloucestershire; identifying existing habitat, restoration opportunities (in terms of ecological opportunities), key existing connectivity and the strategic locations for increasing connectivity.

- 4.5.9 If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as ‘biodiversity offsetting’ in the nearest Green Infrastructure (GI) project as set out in the JCS Green Infrastructure Strategy, or if this isn’t possible, in Gloucester’s designated Nature Recovery Area (NRA) as detailed at Policy E32 of the GCP.
- 4.5.10 For the avoidance of doubt, please note that ‘Local Wildlife Sites’ were previously known as ‘Key Wildlife Sites’.
- 4.5.11 The River Severn, Severn Estuary and tributaries provide a route for migratory fish forming part of the reasons for the Severn Estuary’s designation as a Special Area of Conservation and Ramsar Site. The Severn Rivers Trust has been established to promote projects to improve fish passage along the Severn and to develop greater use of the rivers Severn and Teme by locals and visitors. Development that may have direct and indirect impacts on watercourses used by the SAC and Ramsar species will be subject to a Habitats Regulations Assessment (HRA).
- 4.5.12 Similarly, areas of land within the city such as Alney Island Nature Reserve provide refuge land for bird species designated as part of the Severn Estuary Special Protection Area (SPA). Development that may have direct or indirect impacts on such ‘functionally linked land’ used by SPA bird species will be subject to a Habitats Regulations Assessment (HRA).

\*Habitats Regulations Assessment. *Conservation of Habitats & Species Regulations 2017 (As amended)* – Paragraph 63 & 64. See also adopted JCS Policy SD9 and Policy E7 of this Plan.

## Policy E32: Nature Recovery Area

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>E2: Nature Recovery Area</u>	<u>SD9: Biodiversity and Geodiversity</u>

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

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

- 4.5.13 The Severn Vale Nature Recovery Area (NRA) lies to the west of Gloucester in the floodplain of the River Severn. The NRA (within Gloucester City) is just a small part of a much larger strategically important ecological network. Improvements and enhancements in the NRA will be part of a long-term strategy whereby the City Council, working with a range of stakeholders, will work to realize the potential of a Regional park or similar for the Severn Vale.

4.5.14 Target species currently identified for the Severn Vale NRA are: Brown Hare, Otter, Water Vole, Reed Bunting, Farmland Birds, Curlew, Herring gull, True Fox Sedge, Bullfinch, Bewick Swan, all bat species, Great Crested Newt, Lesser Spotted Woodpecker, House Sparrow, Starling, Noble Chafer, Mistletoe Marble Moth and the Harvest Mouse. The priorities may be subject to change ~~due to ongoing renewal of evidence and will be determined by the LNP.~~

4.5.15 Target habitats for the Severn Vale NRA are:

- Lowland Meadows - management, restoration and creation
- Coastal and Floodplain Grazing Marsh - management, restoration and creation
- Traditional Orchards - management, restoration and creation
- Ponds - management, restoration and creation (particularly of pond complexes)
- Wet Woodland - management and creation
- Hedgerows - management and restoration
- Arable Field Margins - management and creation
- Reed bed - creation
- Coastal Saltmarsh and Intertidal Mudflats - creation
- Lowland Mixed Deciduous Woodland – management and restoration

4.5.16 This list is not exclusive, and priorities may be subject to change due to the ongoing renewal of evidence and will be determined in partnership with the LNP or future equivalent body.

### Policy E5~~3~~: Green/Blue Infrastructure: ~~Building with Nature~~

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>E3: Green / blue infrastructure</u></b>	<b><u>INF3: Green Infrastructure</u></b>

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

4.5.17 JCS Policy INF3 and the associated JCS Green Infrastructure Strategy (GIS) seek to connect the urban areas of Gloucester with the high-quality green/blue infrastructure (~~GI~~) assets of the Cotswold’s AONB and the Severn Vale. ~~GI~~ Green/blue infrastructure and their ~~and~~ ~~its~~ associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. ~~They~~ ~~it~~ ~~has~~ **have** functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaption and amenity value. Importantly, ~~it~~ **local green/blue infrastructure** also contributes to mitigating recreational impacts on European designated sites, including Cotswold Beechwoods.

4.5.18 **Waterside areas, or areas along known flood routes, can act as Green Infrastructure, being used for recreation, amenity and environmental purposes, allowing the preservation of flow**



**routes and flood storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives.**

- 4.5.19 Development should contribute towards this objective, and to the broader network of **green/blue** corridors and assets across the city using SuDS, open space, green roofs and walls and tree planting. **It is important that blue infrastructure such as rivers, streams, canals, lakes, ponds, wetlands and floodplains are fully considered as important assets.**
- 4.5.20 Development has the potential to block corridors resulting in the isolation of habitats from the ecological network which is a concern in an urban area such as Gloucester. The rivers, brooks, disused railway corridors, footpaths and open spaces form important corridors linking communities within the city and habitats to the wider countryside. These vital corridors need to be protected and where possible enhanced for their biodiversity value and as pedestrian/cycle routes through the city.
- 4.5.21 For major developments, the Council will expect developers to **design schemes in accordance with recognised standards, for example Building with Nature or the National Design Guide** use ~~‘Building with Nature’ standards to inform development.~~ Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.
- 4.5.22 ‘Building with Nature’ was developed by the Gloucestershire Wildlife Trust in partnership with the University of the West of England and MHCLG. It promotes a new benchmark for the design and maintenance of green infrastructure in housing and commercial development. Further information on Building with Nature is available at [www.buildingswithnature.org.uk](http://www.buildingswithnature.org.uk).

## Policy ~~E6~~**4**: Flooding, sustainable drainage, and wastewater

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>E4: Flooding, sustainable drainage and wastewater</u></b>	<b><u>INF2: Flood Risk Management</u></b>

Development shall be safe from flooding and shall not lead to an increase in flood risk elsewhere. In accordance with the National Planning Policy Framework, ~~flood risk betterment shall be sought through the development process~~ **opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.**

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

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

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

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

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

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

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

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

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

#### Flooding

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

- 4.5.25 Proposals should have specific regard to the design principles outlined in the National Planning Practice Guidance, including a sequential approach to site layout, ensuring safe access is available for the lifetime of the development (i.e. incorporating climate change) and that it is supported by suitable flood warning and evacuation plans.

#### Sequential Test & Exception Test

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

#### Sustainable Drainage Systems (SuDS)

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

Development should address the water quality guidelines set out in the most up to date version of the CIRIA SuDS Manual (C753).

#### **Upstream Natural Flood Management**

##### **4.5.33 Upstream Natural Flood Management (NFM) may be appropriate in some circumstances as this can achieve the complementary benefits of effective flood risk management and habitat creation. Watercourses in greenspaces, the rural/urban fringe and in appropriate designated areas should be considered.**

#### Climate Change

4.5.34 In calculating the attenuation volume requirements, the uplift on rainfall to allow for climate change shall be 40%, unless it can be demonstrated that the site is likely to revert to greenfield prior to 2070. It is expected that the Environment Agency climate change guidance will be updated in 2019/20 to incorporate the UK Climate Projections 2018 data (UKCP18). This is likely to increase the 40% requirement, and developments will be expected to adhere to the latest guidance, including any future upgrades to climate change guidance during the plan period.

4.5.35 For calculating the climate change uplift for river **both tidal and fluvial** flows (i.e. to determine the design flood level for **the appropriate lifetime of** a development which influences **the its design/layout** of the development including floor levels, flow routes, floodplain compensation and safe access and egress arrangements), developers should refer to the latest Environment Agency climate change guidance. Developers are encouraged to assess the Upper End allowances (currently 70% for the Severn River Basin District based on 100 years lifetime of development). Major regeneration projects and infrastructure development are expected to be designed to **incorporate** this level **as part of any mitigation measures**.

#### Watercourses & culverts

4.5.36 Gloucester's waterways and watercourses are multifunctional assets. They provide transport and recreation corridors, green infrastructure, a series of diverse and important habitats, a unique backdrop for important heritage sites, landscapes, views, a backdrop for cultural and community activities, as well as drainage, flood and water management, and urban cooling functions.

4.5.37 Gloucester City Council supports the Environment Agency in terms of culvert improvement; culverts shall be improved in accordance with the following hierarchy of betterment options; (1) open the culvert (2) replace the culvert (3) leave the culvert in open space for future to open up. All the above options need to incorporate 8 metre buffer strips to allow for access. Each option will still require riparian owners to undertake their responsibilities with regards to maintenance and upkeep of the culvert. It will need to be demonstrated that options higher up the hierarchy are not practicable for them to be discounted. Applicants should contact the Environment Agency and the Lead Local Flood Authority at the earliest opportunity to understand the constraints and opportunities of culverted watercourses for their proposals and because Land Drainage Consent may be required.

4.5.38 Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the eCity Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where

possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improving hydro-morphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.

#### Wastewater

- 4.5.39 The existing sewerage network is known to have areas with capacity issues and network constraints and in some cases improvements to the network may be required for new development to connect. Applicants should contact Severn Trent at the earliest opportunity to understand if improvements to the network are required.
- 4.5.40 Surface water run-off discharge points should be as high up the hierarchy of drainage options as possible; (1) into the ground (infiltration) (2) to a surface water body (3) to a highway drain (4) to another drainage system and (5) to a combined sewer.
- 4.5.41 The creation of an overall masterplan for the development will enable strategic infrastructure serving multiple developments to be designed appropriately, providing wider benefits and efficiencies that would not otherwise be possible. The masterplan should outline key milestones that need to be achieved for critical infrastructure. This will help to align programmes between different stakeholders.

#### Financial contributions towards flood risk management infrastructure

- 4.5.42 **For all developments in areas with known flooding issues, appropriate mitigation and construction methods will be required including, where appropriate, contributions towards maintenance of existing defenses that benefit the site, development or maintenance of existing flood warning services, developments of future flood alleviation projects and/or provision of upstream rural SuDS projects.** ~~Where appropriate, in partnership with the Environment Agency and other flood risk management bodies, the Council will seek financial contributions towards flood risk management infrastructure. The advice within paragraph 56 of the NPPF relating to planning obligations shall be key to determining appropriateness. Such instances would be rare but could include cases where the safety of a development and/or the ability to access the development safely, relies upon flood defences, the Environment Agency's Flood Warning System, or other flood risk management infrastructure.~~
- 4.5.43 The Environment Agency has experience of working with developers and Councils in Gloucestershire to secure financial contributions in such cases. Money secured through such planning obligations can be used towards maintenance and improvements of flood defences, provision and upkeep of river gauges (which support the Flood Warning Service), and other flood risk management projects. Where appropriate, money will be secured through the appropriate funding mechanism for upstream Natural Flood Management.

## Policy E75: Renewable energy potential of the River Severn and the canal



<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>E5: Renewable energy potential of the River Severn and the canal</u></b>	<b><u>INF5: Renewable Energy/Low Carbon Energy Development</u></b>

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

- 4.5.44 All forms of renewable energy generation are increasingly important as globally, nationally and locally, mitigation and adaptation measures are needed to combat climate change. According to the Canal & River Trust the water flowing through the UK's waterways contains enough energy to produce approximately 640 MW of energy.
- 4.5.45 Gloucester benefits both from a major river and a broad canal running through parts of the city. Through the use of heat exchange technologies there is the potential for significant benefits in terms of the heating and cooling of existing or future buildings. All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust and Natural England **and the Marine Management Organisation. Decisions on applications affecting the marine area must consider the South West Marine Plan and Marine Policy Statement in accordance with the Marine and Coastal Access Act.**
- 4.5.46 Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, which will be subject to a Habitats Regulations Assessment (HRA).

## Policy E86: Development affecting Cotswold Beechwoods Special Area of Conservation

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>E6: Development affecting Cotswold Beechwoods Special Area of Conservation</u></b>	<b><u>SD9: Biodiversity and Geodiversity</u></b>

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

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

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

- 4.5.47 There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a Gloucestershire wide approach is required in order to successfully mitigate any likely adverse impacts.
- 4.5.48 The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. ~~The mitigation strategy is expected to be available in early 2020.~~
- 4.5.49 In order to comply with the Habitats Regulations 2017, and specifically to address uncertainties regarding the effects of recreation pressure from new housing in Gloucester City, it is important to provide a policy approach to ensure effective mitigation. The above policy ensures this by requiring that, where residential development is likely to have an adverse impact on the SAC through increased recreational pressure, these impacts are mitigated. Mitigation should be undertaken as per the SAC mitigation strategy or through a bespoke Habitats Regulations Assessment for the development.
- 4.5.50 Appropriate mitigation measures may include:
- On-site measures, including for example the provision of open and green space where this can be accommodated.
  - Where this is not possible, financial contributions towards off-site measures such as green infrastructure, habitat management, access management, residential travel plans,

visitor infrastructure and publicity and awareness raising.

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

- Adopted JCS Policy INF3: Green Infrastructure and the associated JCS Green Infrastructure Strategy.
- City Plan Policies E1: Biodiversity & Geodiversity, E2: Nature Recovery Areas and E4: Green/Blue Infrastructure.

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

## Policy E47: Trees, woodlands and hedgerows

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>E7: Trees, woodlands and hedgerows</u></b>	<b><u>SD9: Biodiversity and Geodiversity</u></b> <b><u>INF3: Green Infrastructure</u></b>

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

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

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

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

**All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would**

**be inappropriate.**

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

- 4.5.53 The City Council recognises the many benefits which woodlands, orchards, hedgerows and trees generally bring to the city. Trees and hedgerows are an important part of the city's landscape having cultural and biodiversity significance, amenity value and providing cooling effects in urban areas. Tree planting can reduce the impacts of air pollution, the impacts of climate change and global warming and improve health and wellbeing of the community.
- 4.5.54 The basis of this policy is a strong commitment to increase tree cover across Gloucester and to increase the number of street trees and trees in parks and areas of Green Infrastructure where there is scope to do so. Likewise, it is important that trees and hedgerows, as natural assets, are preserved for the enjoyment of future generations. Net gain and mitigation planting, depending on location, will generally be required to be locally appropriate native species.
- 4.5.55 In terms of street trees, the Council considers that, given the significant benefits which trees afford to all residents of the city, technical solutions are available to address concerns such as pavement heave or issues of reduced visibility and mobility.
- 4.5.56 **New planting should include measures for appropriate long-term maintenance. It is expected that the protection measures will adhere to those contained within BS 5837:2012 Trees in relation to design, demolition and construction – recommendations, or subsequent revisions. The Council's Arboriculturist will advise.**
- 4.5.57 **Through planning conditions, for the protection of wild birds, developers should be dissuaded from using exclusion netting and encouraged to either retain woodland features or undertake works at appropriate times of year.**

\* Veteran trees are defined as 'trees that are of interest biologically, culturally or aesthetically because of their age, size or condition' (Ministry of Housing, Communities and Local Government; Ancient trees and veteran trees: protecting them from development', 2019). **For veteran trees root protection buffers should generally be greater than standard buffers. Again, the Council's Arboriculturist will advise.**

# F: DESIGN

## Introduction and context

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

### Policy F1: Materials and finishes

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>F1: Materials and finishes</u></b>	<b><u>SD4: Design Requirements</u></b>

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

**The and respect the wider landscape should be respected in terms of the views into the city from Robinswood Hill, and the surrounding hills.**

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



- 4.6.5 Local distinctiveness in the built environment is founded on the understanding of the characteristics and influences of the locality, particularly its landscape quality and corresponding use of materials. Understanding this can help to shape our modern communities, giving them a sense of history and distinct local identity whilst supporting sustainable development using locally sourced materials and promoting traditional skills.
- 4.6.6 Development will be expected to complement and enhance the varied built environment, creating interesting and attractive buildings and places. It is important that new developments are designed to a high standard to ensure an attractive and functional place for people to live, work and visit to deliver prosperity and help attract inward investment. The City Council’s Townscape Character Assessment (2019) provides detailed information regarding the character and local distinctiveness of Gloucester. Applicants should use this evidence to inform proposals and demonstrate how this has been addressed through the Design and Access Statement.
- 4.6.7 Attention to detail can really make or hinder the overall design, appearance and **sense of** quality of a place. Particular attention ~~will~~ **should** be paid to finishes, materials, ~~joins and fixing methods between materials, window sills (double sub-sill window sills are architecturally inappropriate), window reveals, window design, lintels, door design, the placement of meter boxes, flues, vents, chimneys, gutters and down water pipes, aerials, antenna and boundary treatments (although this list is not exhaustive)~~ **and the placement of external features to ensure the architectural design remains uncluttered, well designed and beautiful.**
- 4.6.8 The wider landscape of a scheme needs to be carefully considered. New developments should avoid the use of light coloured or reflective roofing materials so that the development doesn’t have undue prominence **or create glare,** when viewed from the surrounding landscape.

## Policy F2: Landscape and planting

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>F2: Landscape and planting</b>	<b>SD4: Design Requirements</b> <b>SD6: Landscape</b> <b>INF3: Green Infrastructure</b>

**Planning applications for major development proposals where landscaping is to be considered,** must be accompanied by a landscape scheme, incorporating hard landscape and planting details. **Such plans must** Planning permission will be granted for schemes that:

1. ~~Exhibit a design and choice of~~ **Use high quality** hard materials, boundary treatment and planting appropriate to the particular location and existing landscape character, or create a new and distinctive character where this is currently lacking; and

2. Retain and incorporate existing natural features such as trees, hedges and watercourses, where possible; and
3. Ensure, ~~in appropriate developments, especially housing schemes,~~ that adequate space is provided for the planting and maturing of suitable large-scale trees **and hedgerows**; and
4. ~~Indicate~~ **Incorporate well-designed, suitable, and functional** areas of public open space and amenity land. **Plans must indicate which spaces** ~~that~~ are proposed for adoption and provide full details of who will be adopting and maintaining the spaces.

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

4.6.9 Landscape design can do much to enhance a development by providing an appropriate setting for buildings and an environment for people to enjoy. It can define spaces, create shelter and privacy, enhance or screen views, extend wildlife habitats and create identity and character. The landscape scheme must be considered as an integral part of the project from the outset and throughout the design process. Where appropriate, the layout, implementation and management of landscape schemes will be achieved by the use of planning conditions.

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

- Grow better as they are adapted to the local climate
- Suit their local context (e.g. urban edge sites)
- Support significantly more species of fauna.

4.6.11 The use of seed and plant stock of local provenance will also be encouraged. Consideration should also be given to the changing climate ensuring that species are chosen that can withstand the effects of climate change.

4.6.12 **Adequate space must be provided around trees and hedgerows to ensure that when they achieve maturity there is still plenty of space around them for them to thrive, be easily accessed and maintained, remain healthy and not cause any nuisance to the occupiers of nearby buildings. Leaving insufficient space can mean that trees and hedgerows fail to thrive and can lead to future requests for their removal.**

4.6.13 Where appropriate hard landscaping schemes should accord the Gloucester Public Realm Strategy (2017) and any subsequent amendments.

### Policy F3: Community safety

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>F3: Community safety</u>	<u>SD4: Design Requirements</u>

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

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

- 4.6.14 A well-designed environment can help to reduce the real and perceived risk of crime. The design and layout of buildings, open spaces, roads and footpaths can influence opportunities to commit crime and affect people's sense of safety and security. Appropriate design and layout of landscaping, planting and lighting can reduce crime and the fear of crime. Development proposals should be designed to provide safety within the development site and in nearby and adjacent areas.
- 4.6.15 Parking courts are not normally considered appropriate as these can often be poorly surveilled and inconvenient for residents who prefer to park at the front of their property where they can see their vehicle and easily access their front door. Often parking courts are abandoned as the development ages and can become areas for fly tipping and antisocial behavior. Integrated garages will only be accepted where there are windows serving habitable rooms on the ground floor overlooking the driveway and street.
- 4.6.16 **Lighting shall have low energy needs and be designed to ensure that it does not create excessive glare to highway users or to residential properties. Lighting that would have a detrimental impact on wildlife would not normally be permitted.**
- 4.6.17 **If in exceptional circumstances rear parking courts are permitted, they should be well lit, overlooked, the same style as other parts of development, and restricted to a maximum of 10 spaces per court. Parking courts should only have one entrance/exit point to ensure that there is no reason for non-residents to travel through the court.**
- 4.6.18 Further guidance can be found in the City Council's 'Designing Safer Places' Supplementary Planning Document, or any future iteration.
- 4.6.19 When designing public buildings and spaces consideration shall also be given to designing out opportunities for malicious threats and acts of terror. The council will seek the views of the Police Architectural Liaison Officer from Gloucestershire Constabulary on all major planning applications.

## Policy F4: Gulls

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>F4: Gulls</u>	<u>SD14: Health and Environmental Quality</u>

Development proposals are expected to implement all viable non-lethal humane steps to prevent gull roosting, nesting and damage should be taken. Gull mitigations measures shall be well designed and sympathetic to the building and its setting.

- 4.6.20 Both lesser black-backed gulls and herring gulls nest in and around Gloucester City. Both species are experiencing declines across their range and a major proportion of the European breeding population of both species is found within the UK. The herring gull’s conservation status is listed as ‘red’ and that of the lesser black-backed gull ‘amber’. Gulls are declining in their traditional breeding localities due to a reduction in food (fish) and have colonised urban areas because of the ready availability of food (food waste, litter) and predator-free nest sites (buildings).
- 4.6.21 Gloucester’s large urban gull population cause disturbance and damage to buildings, through their excrement, nesting, and from their mating ritual of dropping stones on glazing and other shiny materials. They can be a nuisance to residents and visitors and can be particularly aggressive at certain times of the year.
- 4.6.22 All viable non-lethal steps should be taken in new development to prevent exacerbation of this problem. Gull mitigation measures should be considered from the outset to avoid the need for retro-fitted schemes which can be costly and disturb an established habitat. Applicants should also consider access arrangements for the maintenance of mitigation measures.
- 4.6.23 Advice on design advice and suitable non-lethal mitigation measures is available in ‘Gulls – How to Stop Them Nesting on Your Roof’ (2016), produced by Gloucester City Council, or any future iteration.

## Policy F5: Open plan estates

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>F5: Open plan estates</u>	<u>SD4: Design Requirements</u> <u>SD9: Biodiversity and Geodiversity</u>

Enclosure of front and side gardens and unusable strips of land will be ~~permitted~~ **allowed** on existing ~~in~~ open plan estates provided that the land to be enclosed does not adjoin a footpath link. ~~In all cases the~~ and its enclosure ~~does~~ **should** not harm the visual amenity, ~~or~~ community safety, **or degrade the ecological networks** of the locality.

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

## Policy F6: Nationally Described Space Standards

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>F6: Nationally Described Space Standards</u></b>	<b><u>SD11: Housing Mix and Standards</u></b>

Development proposals for new residential development (including change of use or conversions) must meet Nationally Described Space Standards **(or any future successor)**.

- 4.6.26 The NPPF *states* makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for a variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.
- 4.6.27 To support this policy, the City Council undertook an analysis of the gross internal floorspace of a range of dwellings delivered in the city over the past three years against the Nationally Described Space Standards (NDSS). During this time, a total of 1,451 units were constructed, an average of 483 per year. Of these dwellings 144 were assessed, a sample size of 30%. The analysis demonstrates that just over 51% of the homes delivered met the standard, with a further 19% almost meeting the standard (3.5 sq m short or less). This means that 30% of new homes did not meet the NDSS. For detailed analysis is available in the Housing Background Paper, available to download from the City Council’s website.
- 4.6.28 Poor internal space is linked to poorer health (specifically mental health) and poorer educational achievement. Where new dwellings are created with sufficient internal space inhabitants are afforded a range of benefits including; the ability to better socialise with family members and guests, sufficient storage, greater flexibility in arranging rooms to suit need, the ability to work from home, space for effectively managing waste and recycling, adequate access to daylight and ventilation and allowance for adaptation should inhabitants suffer from permanent or temporary impaired mobility.
- 4.6.29 Gloucester City Council places great weight on the quality of life and health and wellbeing of its residents. For this reason, the NDSS have been adopted. Development proposals *must demonstrate compliance with and* will be robustly assessed against the standards set out in Technical Housing Standards – Nationally Described Space Standard March 2015, or any



standards revoking or superseding those standards. **Exceptions will only be made where the applicant can clearly demonstrate that the standards cannot be met because of the nature of the development, for example where it is a conversion of an existing building into new residential dwellings and meeting the standard would affect the structural integrity of the building.**

4.6.30 **A transition period of 3 months will apply from the adoption date of the Gloucester City Plan. During this time the council will strongly encourage developers to meet the requirements of NDSS.**

## Policy ~~D4~~**F7**: Shopfronts, shutters and signs

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>F7: Shopfronts, shutters and signs</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>SD8: Historic Environment</u></b>

**Development that** There will be a presumption in favour of retaining good quality traditional shopfronts, **including any features such as blind boxes or historic signage,** where they make a positive contribution to the character of an area **will be supported.**

The City Council will support the following **Developments for shop fronts, shutters and signage will be permitted where it can be demonstrated that:**

1. **The** ~~Proposals that~~ retains or reinstates a traditional timber shopfront architectural detailing, including timber fascia's and painted signage; **or**
2. **Proposals for new shopfronts** ~~New shopfronts which~~ are of a high quality and respond to the **character of the scale and design of the building and the** character of the area;
3. Internal shutters ~~which~~ are open and allow shopfront displays to be prominent in the streetscene;
4. Signage ~~which~~ is sympathetic to **the scale and architectural style of the building,** its surroundings and **is** not visually dominant or results in visual clutter;

**In an historic setting in addition to the above the following will also be supported:**

5. **Non-illuminated or halo illuminated signage for applied and freestanding signage;** ~~illuminated signage which is halo illuminated especially in sensitive historic settings;~~
6. **Timber fascia signage;**
7. Traditional hanging signs in timber on a metal bracket; and
8. Colours for shopfronts and signage ~~should be~~ sympathetic to the character of a building or area and ~~very bright and garish colours should be avoided.~~

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

- 4.6.31 The Shopfront, Shutters and Signage policy will ensure that schemes are well considered and make a positive contribution to the streetscene and wider urban environment. **Well-designed shopfronts and associated signage add to the character and quality of the city, change perceptions of local character and create a sense of place and pride.** Most people recognise the importance of an attractive central shopping core to the city and encourages ing tourism providing an attractive environment for business and residents. **Shopfronts should be designed to provide active building frontages with display windows, which contribute to the vibrancy of the shopping area and provide visual interest in the streetscene. Signage should be subtle and complement the built environment.** A high standard of shopfront design, construction and maintenance is one of the most effective ways of improving appearances and changing perceptions of local character and pride. Retention of historic shopfronts and sympathetic signage can help to protect the history of our city, provide opportunity for innovative and imaginative design and can result in a more attractive, richly varied and prosperous environment for residents, traders, workers and visitors alike.
- 4.6.32 In all cases, both in an historic setting or in a more modern setting, it is important that shopfronts and signage are well proportioned, and **the design and materials will need to take into account the character and appearance of the property and the wider area** sympathetic in scale and design to the building and the wider street scene.
- 4.6.33 ~~Proposals should accord with~~ **The** City Council's Shopfronts, Shutters & Signage Design Guidelines for Gloucester Supplementary Planning Document (2017) or any future iteration. ~~This document provides information on general design guidelines~~ **that can be applied to** ~~the to be used during the design or alterations to shopfronts, shutters and signs across the city and will be used to support the regeneration of Gloucester.~~

# G: SUSTAINABLE LIVING, TRANSPORT AND INFRASTRUCTURE

## Introduction and context

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

### Climate change

- 4.7.4 Climate change is happening now; it is the issue of our times that cannot be ignored. The City Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step-change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.
- 4.7.5 Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in ~~offices~~ **offices** and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.
- 4.7.6 **In order to address the climate emergency, and in compliance with JCS Policy SD3 Sustainable Design and Construction, all applications for new buildings will be expected to demonstrate that all reasonable techniques have been utilised to adapt to and mitigate the effects of climate change.**
- 4.7.7 **JCS Policy SD3 requires the submission of an Energy Statement as well as a Waste Minimisation Statement for all major development. The City Plan strongly encourages all applications for new buildings to supply an Energy statement and a Waste Minimisation Statement.**
- 4.7.8 **The GCP strongly encourages energy efficiency measures allied with the appropriate use of renewable energy in new buildings and the retrofitting of existing buildings. It is considered**

**that, as technologies and energy markets evolve, there are increasing opportunities to utilise renewables in sustainable design and construction without excessive costs.**

4.7.9 **More specifically**, climate change is a theme that runs through the whole of GCP and is a Strategic Objective of the JCS. A number of policies in this plan address climate change and its impacts either directly or indirectly. These include:

- Requiring new developments to make overall improvements to the natural environment (Policy A1)
- Protecting existing trees, woodlands, hedgerows and ensuring every opportunity is taken to increase new planting. (Policy E7)
- Requiring development to contribute towards the protection and enhancement of the Green **and Blue** Infrastructure Network. (Policy E3)
- Requiring major development to be designed in accordance with ‘Building with Nature’ **Recognised Green/Blue Infrastructure standards**. (Policy E3)
- Requiring developments are safe from flooding and contribute to flood risk betterment. (Policy E4)
- Requiring all development to incorporate SUDs and facilitate watercourse reconstruction. (Policy E4)
- Ensuring appropriate attenuation volume rates to allow for the increased rainfall from climate change. (Policy E4)
- Supporting the use of the River Severn and canal for renewable energy generation. (Policy E5)
- Requiring new landscape and planting to be climate change adaptable. (Policy F2)
- Requiring development proposals to conserve and provide net gains to biodiversity. (Policy E1)
- ~~Requiring electric vehicle charging points in every new home with a garage or on plot parking space, and 2% of spaces within 100 or more car parking spaces. (Policy G2)~~
- Protecting and improving cycle lanes and maximising opportunities for sustainable active travel. (Policy C1, ~~G32~~, ~~G43~~)
- Introducing the enhanced water efficiency standards reducing water consumption for each new home. (Policy ~~G76~~)
- Protecting allotments and providing new allotments where there is a need. (Policy C2)
- Using green infrastructure to absorb dust and air pollutants from major developments, and increasing planting in AQMA, and around schools and hospitals. (Policy C5)

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

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

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

renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities' the Gloucestershire Climate Change Strategy 2019 and The Gloucester Climate Change Strategy and future iterations.

## **Policy G1: Sustainable transport and parking**

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b><u>G1: Sustainable transport</u></b>	<b><u>SD4: Design Requirements</u></b> <b><u>INF1: Transport Network</u></b> <b><u>INF6: Infrastructure Delivery</u></b>

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

**In all development the following measures will be prioritised over the parking of private vehicles:**

- **On-street space which is designed and allocated for pedestrians, cyclists, mobility users and deliveries.**
- **Bus stops and bus priority measures.**

### **Cycle Parking**

**For residential development a minimum of 1 cycle parking space per 1 bedroom dwelling and 2 spaces per dwelling with more than 1 bedroom is required. For Houses of Multiple Occupancy (HMO) cycle parking shall be provided at a ratio of 1 space per bedroom.**

**In all development cycle parking must be sheltered, secure and easily accessible. Cycle parking in residential garages will only be accepted where the garage has a minimum internal dimension of 6m x 3m.**

### **Car Parking**

**All new development will provide car parking to a level and design that is appropriate for the local context taking into account:**

- a. **The accessibility of the development;**
- b. **The type, mix, and use of development;**
- c. **Any parking restrictions or restraints in the area;**
- d. **The availability and opportunities for public transport;**
- e. **Local car ownership levels; and**
- f. **The need to ensure adequate provision of spaces for charging plug-in and other ultra-low emissions vehicles.**

**The minimum car parking space is 2.4m x 4.8m. A minimum of 6m is required in front of a garage door. Tandem parking spaces for individual residential dwellings is limited to 2 vehicles and must not overhang the footpath. For ease of use both spaces must serve the**



**same dwelling. The maximum number of adjoining car parking spaces in a row, adjacent to a footway, is 6 spaces.**

The Council will work closely with Gloucestershire County Council and other organisations regarding all local transport matters. The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and the Gloucester City Plan Highways Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.

The policies set out in the JCS and the Gloucestershire Local Transport Plan will also be used for development management matters and planning application decision making.

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

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

3.7.10 The provision of transport projects and improvements is a fast moving and changing activity and closely linked to more general development delivery activities especially those that are planned through the JCS. Setting policies in the city plan for each specific piece of potential transport infrastructure is not considered necessary and would become out of date very quickly. The Gloucestershire Local Transport Plan performs this role better than the GCP can and will be frequently updated. The JCS also provide a transport strategy and policy context for the consideration of transport issues in the development management process. This is appropriate given the significance of joint working in the county and the likelihood that this will continue. In addition, to support the delivery of the quantum of development proposed within the city, a Highways Assessment has been undertaken. This identifies interventions necessary on the highway network necessary to support the GCP.

**4.7.13 The Council will work closely with Gloucestershire County Council and Highways England as transport and highways authorities regarding all local transport matters. The Council will have regard to the Gloucestershire Local Transport Plan, Transport Implementation Strategy, Infrastructure Delivery Plan and Gloucester City Plan Highways Assessment regarding priority projects for implementation, including the capital and revenue funded transport projects identified in the city.**

**4.7.14 In accordance with Policy INF1 of the adopted JCS, 'Planning permission will be granted only where the impact of the development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highways Authorities and in line with the Local Transport Plan.'**

4.7.15 At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies within the JCS and GCP.

3.7.12 Further information on Car Parking in new residential developments, Cycle Storage, Active Design, Air Quality and Pollution can be found in the Design and Health and Wellbeing sections of this plan.

#### Cycle parking design

4.7.16 Cycle parking must be sheltered, secure and easily accessible. Designers should in the first instance look to design facilities located close to the primary entrance of the dwelling or building. In all cases to be easily accessible the cycle parking should be located closer to the main entrance than the car parking that serves that building or dwelling. This will require careful design to present an attractive facility. In some circumstances, for example where dwellings do not have front gardens or in the case of flats and HMOs where the number of spaces may be greater than the physical space available at the front of the property, parking in the rear garden will be accepted where the route is direct and as short as possible. It is not considered acceptable to negotiate 90-degree bends and/or several doors with a bicycle. Access through the dwelling to the rear garden is not considered acceptable.

#### Car Parking

4.7.17 The quantum of car parking will depend on the specific circumstances of the site. This will ensure that effective and efficient use of land is made. Those development that are centrally located, close to public transport, and in areas with low car ownership, will not require as much land dedicated to car parking as more suburban sites with high levels of car ownership and limited access to public transport.

4.7.18 Where a location can be shown to support a 'no car' or 'low car' approach then an approved Travel Plan will be required in accordance with Policy INF1 of the JCS. This will identify specific outcomes, targets and measures and set out clear future monitoring and management arrangements. This will be especially important in areas that are already subject to parking restrictions where on-street parking or access to existing parking permit schemes may not be possible. 'No car' and 'low car' developments will require, as part of the Travel Plan, a communication strategy to ensure that new residents understand the limited availability of car parking spaces. Where some spaces are available it must be made clear who those spaces are to be used by.

4.7.19 Minimum sizes are provided to ensure that spaces are useable and that tandem car parking spaces do not impact on the pedestrian environment or are designed in a way that would inconvenience the user.

4.7.20 Further information on car parking in terms of the configuration of car parking courts and community safety can be found in City Plan Policy F3: Community Safety. Policy SD4 of the JCS sets out the hierarchy of transport modes and the design approach that should be undertaken. Applicants are also encouraged to refer to the latest version of Gloucestershire Manual for Streets and the Gloucestershire Local Transport Plan for further guidance.

### Policy G2: Charging infrastructure for electric vehicles

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
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<del>G2: Charging infrastructure for electric vehicles</del>	<del>SD3: Sustainable Design and Construction</del> <del>SD4: Design Requirements</del>
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~~An electric vehicle charging point/socket will be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage.~~

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

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

4.7.21 JCS Policy SD4 'Design requirements' promotes, where feasible, facilities for charging plug-in and other ultra-low emission vehicles for the scale of development where a masterplan is required. The GCP builds on this, based on the following:

- ~~The NPPF (2019~~21~~) at Para 105 ~~107~~ encourages policies to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicles.~~
- ~~Under Government plans, the sale of new petrol and diesel vehicle will be prohibited by 2040 and possibly sooner.~~
- ~~Global vehicle manufacturers are already making a major shift to electric or hybrid-vehicle production and during the plan period there is likely to be major technological change at a rapid pace. Towns and cities across the UK are putting in new infrastructure and Gloucester cannot afford to get left behind.~~
- ~~Meeting targets outlined in the Government's 25 Year Environment Plan especially relating to 'Clean air' and 'Mitigating and adapting to climate change'.~~
- ~~Existing air quality issues within the city, including the existence of four Air Quality Management Areas.~~

4.7.22 ~~In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a single phase 13 amp socket. This is likely to be upgraded by the homeowner as technologies change **charge point with a minimum power rating output of 7kW, be fitted with a universal socket that can charge all types of electric vehicles currently on the market and meet the relevant safety and accessibility requirements.**~~

4.7.23 ~~**A rapid charging point is a universal charging point that can charge the car to 80% or more in one hour or less.**~~

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

## Policy G32: Cycling

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>G2: Cycling</u></b>	<b><u>INF1: Transport Network</u></b> <b><u>INF6: Infrastructure Delivery</u></b>

Cycle lanes and paths that make up Gloucester’s existing cycle network will be protected and development that promotes new routes and improved cycle security will be encouraged. **All developments must provide safe and secure access by cycle.**

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

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

4.7.24 Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards reducing carbon emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently. There is evidence that ‘green’ cycling routes are more likely to be used and that they contribute to the enhancement of ecological networks. These factors should be considered when improvements are made.

4.7.25 The extent of Gloucester’s existing cycle lanes and paths are outlined in the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017) **and it is important that this document is referred to in considering development that promotes or protects cycling infrastructure in the city.** The four priorities highlighted in the policy reflect recent work undertaken by the County and City Council and the project delivery priorities on page 23 of the Gloucestershire Local Transport Plan (2015 – 2031) Policy Document 2 – Cycle (November 2017).

4.7.26 With regard to the Canal towpath, this is not a dedicated cycle path and current and future use must reflect the needs of other users.

## Policy G43: Walking

<b><u>Gloucester City Plan policy</u></b>	<b><u>Other Development Plan policy</u></b>
<b><u>G3: Walking</u></b>	<b><u>INF1: Transport Network</u></b> <b><u>INF6: Infrastructure Delivery</u></b>



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

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

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

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

- 4.7.27 For most people walking as a leisure activity or as a means of getting about is an important part of daily life. Gloucester is a relatively small city which is also quite flat, and it is possible to walk right across the city in a reasonable time frame.
- 4.7.28 Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car. There is evidence that ‘green’ walking routes (e.g. pavements with trees) are more likely to be used and that they contribute to the enhancement of ecological networks. These factors should be considered when improvements are made.
- 4.7.29 Working together the City Council and Gloucestershire County Council are particularly keen to promote improvements in walking routes to sustainable transport hubs i.e. the new bus station and railway station.

## Policy G54: Broadband connectivity

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>G4: Broadband connectivity</b>	<b>INF6: Infrastructure Delivery</b>

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

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

4.7.30 Access to high speed broadband and uninterrupted connectivity is a fundamental of modern living and working. However, there are still instances where new homes and business units have been built without high speed broadband connectivity.

4.7.31 The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-fibre broadband by 2025. This policy requires all new residential and commercial development to be serviced by a ~~high speed,~~ reliable and high-speed broadband connection. At present, the main target standard is for full-fibre connectivity. This may well change in the future; if this is the case, it is expected that properties should be meet the best possible standard.

## Policy ~~G6~~G5: Telecommunications infrastructure

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>G5: Telecommunications infrastructure</u>	<u>INF6: Infrastructure Delivery</u>

Development proposals for telecommunications infrastructure **will be permitted where it can be demonstrated that** ~~must demonstrate that~~ the development **is sympathetically designed and** would not have an adverse impact upon the environment (including heritage assets, biodiversity, local amenity, the landscape and its setting).

In siting any equipment, every effort must be made to minimise visual impact. Proposals will be expected to use/share existing **masts,** structures ~~of~~ buildings where possible. **Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.**

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

4.7.32 The City Council supports the introduction of ~~modern~~ **an advanced, high quality and reliable** communications networks, which are essential to support the growing demand for improved communications. However, this has land-use implications in the form of structures such as masts, aerials and satellite dishes and this in turn has implications for the surrounding area. **To minimise the visual impact of telecommunications infrastructure, the number of sites for such installations, shall be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.**

4.7.33 Planning applications for new telecommunications infrastructure will be required to balance environmental, visual ~~and~~ **amenity and health** concerns with the future development needs of the mobile technology networks. Mobile phone masts and antennas should always be

located and designed to respect their context and the amenity of those living, working or spending time in the locality.

- 4.7.34 Well-designed telecommunications equipment might be painted an appropriate colour to relate to background and surroundings or existing features. Prominent building-mounted antennas and equipment might be appropriately disguised and camouflaged to blend in with the building and streetscape. Equipment cabinets should be kept to a minimum and should be as small and unobtrusive as reasonably practical.
- 4.7.35 Where proposed development may affect a footpath or the public highway, applicants should have regard to how equipment siting may affect pedestrian movements and visibility splays for all highway users. Good, safe access for service vehicles to the proposed apparatus should also be demonstrated. The City Council will consult the highway authority on these matters where appropriate.

### Policy **G76**: Water Efficiency

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>G6: Water Efficiency</b>	<b>SD3: Sustainable Design and Construction</b> <b>INF6: Infrastructure Delivery</b>

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

- 4.7.36 The NPPF sets out that plans should take a proactive approach to mitigating and adapting to climate change, taking into account long-term implications for flood risk, water supply, biodiversity and landscapes. Gloucester City lies within the Severn Trent Strategic Grid area, which has been identified as 'high vulnerability' within the Water Resource Management Plan (2019). It is therefore important that the amount of water used is reduced and that new developments install water efficient fitting and appliances in new homes. More generally, improved water efficiency provides wider benefits to the water cycle and environment.

### Policy **G87**: Review mechanism

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>G7: Review mechanism</b>	/

Where planning policies cannot be immediately met by a development, due to wholly exceptional circumstances, a review mechanism shall be imposed for phased

developments to ensure the ability of the development to comply with the relevant policies over the lifetime of the project is rigorously tested.

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

# 45. SITE ALLOCATIONS

## Introduction and context

### Development needs and strategy

- 4.1 — The NPPF requires that local authorities should positively plan to deliver development needs. For Gloucester, these development needs are set by the strategic level Joint Core Strategy (JCS), which was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. Between 2011 and 2031, the development needs are;
- Policy SP1 — ‘The need for new development’: 14,357 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, 192 hectares of B-Class employment land to support approximately 39,500 new jobs.
  - Policy SD2 — ‘Retail and City / Town Centres’: 45,500 sq m (net) of comparison goods retail floorspace and 3,600 sq m (net) of convenience goods floorspace.
  - Policy SD13 — ‘Gypsies, Travellers and Travelling Showpeople’: This policy sets out a criteria-based policy for the assessment of planning applications for these communities. The supporting text sets out accommodation needs arising from the Gloucestershire Gypsy and Traveller Accommodation Assessment (2016). For Gloucester, it identifies a need of two Gypsy pitches and 16 Travelling Showpeople plots arising from Gloucester’s existing communities. In relation to transit pitches for those members of the community travelling through the area, the GTAA recommends that there is no need for such provision and that the authorities should instead consider the use of ‘temporary tolerated stopping places’.
- 4.2 — Policy SP2 ‘Distribution of new development’ of the JCS, sets out the delivery strategy, which is the delivery of development that maximises urban capacity, alongside the identification of urban extensions (strategic allocations) to the main urban areas of Gloucester and Cheltenham. This is so as to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to balance employment and housing needs, and provide new development close to where it is needed and where it can benefit from the existing and enhanced sustainable transport network.
- 4.3 — Most strategic allocations are in Tewkesbury Borough; this reflects the fact that Gloucester has a very limited land supply and in order to meet development needs, it has been necessary to work in partnership with Tewkesbury Borough Council to identify urban extensions within that local authority area. One strategic allocation, Winnycroft, is located within the administrative area of Gloucester City.

### Delivery

- 5.1 Approximately 34% of Gloucester’s housing needs will be delivered through ‘Strategic Allocations’ in the JCS. Likewise, they will make a substantial contribution to the need for employment land for the wider JCS area.
- 5.2 That said, a substantial proportion has been and will be provided for within Gloucester’s administrative area. Some of the needs within the plan period (since 2011) have already been delivered, having been granted planning permission and built or are under construction. Many more already have planning permission (known as ‘commitments’) and



will be constructed over the next few years. In addition, the City Council makes an allowance for ‘windfall’ development; this is development that comes forward on sites that aren’t allocated for development.

- 5.3 Further capacity is to be delivered through site allocations within the Gloucester City Plan (GCP). These have been identified through officer searches, call for sites, regeneration proposals and the brownfield register. Sites have been assessed for their suitability, availability and viability through the annual review of the Strategic Assessment of Land Availability (SALA) and in many cases, tested through community and stakeholder consultation and engagement.
- 5.4 In total, the GCP makes ~~22~~ **18** site allocations for residential development, employment development, mixed-use development, a school and community use. The site allocations **are** underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Transport Assessment and Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery. ~~A summary of the site allocations is provided below:~~
- 5.5 The potential capacity of a site to accommodate new development has been determined in one of two ways; the first is to draw on existing masterplans or proposal from which a realistic capacity can be identified; the second is to use a ‘density calculation’, whereby an allowance is made from the gross site area for infrastructure and community uses, and a calculation then made of the likely capacity of the remainder. **The housing capacities identified in Policy SA are indicative and do not represent a ceiling. Proposals should be considered in the context of Policy SD10 ‘Residential Development’ of the adopted JCS and Policy A1 of the GCP ‘Effective and efficient use of land and buildings for housing’, which seek to ensure the best use is made of land, consistent with its location and character.**
- 5.6 In making the most efficient and effective use of land, higher capacities have been identified for site allocations where they are within, or in close proximity to the city centre, near the transport hub (bus station and train station), and where appropriate in the context of the surrounding character and uses. In other locations, capacity assumptions are based on a higher level ‘suburban density’ of 35 to 40 dwellings per hectare, in accordance with the SALA methodology.
- 5.7 **Policy SA below sets out the site allocations for the GCP. Underneath this, each allocation is accompanied by a Site Allocation Statement, which is intended to provide guidance that will be used in the determination of planning applications.**

*Housing*

- 4.10 Gloucester city’s housing delivery position, as of 31st March 2019, is summarised in the table below:

	Gloucester City	Tewkesbury Borough
JCS Strategic allocations (Tewkesbury Borough)	-	4,895
Winnycroft Strategic allocation (Gloucester City)	620	-
Completed	3,993	
Planning consents	2,339	-
‘Windfall allowance’	640	-

Gloucester City Plan allocations	972	-
TOTAL	13,459	

4.11—Further information is available from the housing monitoring report (September 2019), available to download from the City Council’s website.

4.12—Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to 900 dwellings. This shortfall is acknowledged and accepted within the JCS. Policy REV01 ‘Gloucester and Tewkesbury Housing Supply Review’ states the need for an immediate review of housing supply and that ‘The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities’.

4.13—The JCS Review has already commenced with an ‘issues and options’ consultation taking place during November 2018 and January 2019. Further information is available from the JCS website.

*Employment land*

4.14—From an employment perspective, a total of 14.6 hectares is allocated, either as 100% ‘B Class’ employment sites or as part of wider mixed-used schemes. Together, they will deliver a substantial amount of employment floorspace. Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.

*Retail and city / town centres*

4.15—Policy SD2 ‘Retail and City / Town Centres’ provides the current JCS position. However, the policy is subject to an immediate review; criterion 7 of the policy states ‘Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.’ As mentioned above, this review has already commenced with an ‘issues and options’ consultation held between November 2018 and January 2019. Consultants have been appointed to undertake the necessary evidence and support the JCS authorities in taking forward the emerging plan.

*Gypsy and traveller communities*

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

<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<u>Site Allocations</u>	<u>SP1: The Need for New Development</u> <u>SP2: Distribution of New Development</u> <u>SD1: Employment – except retail development</u> <u>SD10: Residential Development</u> <u>SD13: Gypsies, Travellers and Travelling Showpeople</u> <u>Minerals Local Plan for Gloucestershire 2018 – 2032: Core Policy MS01 – Non- Mineral Development within Mineral Safeguarding Areas</u>

<u>Policy SA: Gloucester City Plan Site Allocations</u>		
<u>Policy Ref</u>	<u>Site</u>	<u>Allocation</u>
SA01	Land at the Wheatridge	2 Form Entry Primary School and approximately 10 residential dwellings.
SA02	Land at Barnwood Manor	Approximately 30 residential dwellings.
SA03	Former Prospect House, 67 – 69 London Road	Approximately <del>30</del> <b>60</b> residential dwellings.
SA04	Former Wessex House, Great Western Road	Approximately <del>20</del> <b>40</b> residential dwellings.
SA05	Land at Great Western Road Sidings	Approximately <del>200</del> <b>300</b> residential dwellings.
SA06	Blackbridge Sports and Community Hub	Multi-use sports, physical activity and community hub.
SA07	<del>Lynton Fields, Land East of Waterwells Business Park</del>	<del>'B' class employment uses.</del>
SA08	King's Quarter	Mixed use 'main town centre uses'.
SA09 <del>7</del>	Former Quayside House, Blackfriars	B1 offices, combined GP practice, pharmacy, approximately 50 residential dwellings.
SA10 <del>08</del>	Former Fleece Hotel / Longsmith Street Car Park	Mixed use 'main town centre uses' and approximately 25 residential dwellings.
SA11 <del>09</del>	Land rear of St Oswalds Retail Park	Approximately 300 residential dwellings.
SA12	<del>Land at Rea Lane, Hempsted</del>	<del>Approximately 30 residential dwellings.</del>
SA13 <del>10</del>	Former Colwell Youth and Community Centre	Approximately 20 residential dwellings.
SA14 <del>11</del>	Land off New Dawn View	Approximately 30 residential dwellings.

SA15 <u>12</u>	Land south of Winnycroft allocation	Approximately 30 residential dwellings.
SA16 <u>13</u>	Land off Lower Eastgate Street	Approximately 15 residential dwellings.
SA17 <u>14</u>	Land south of Triangle Park (Southern Railway Triangle).	B1 / B8 class employment uses.
SA18 <u>15</u>	Jordan's Brook House	Approximately <del>20</del> <u>10</u> residential dwellings.
SA19 <u>16</u>	Land off Myers Road	Approximately 10 residential dwellings.
SA20 <u>17</u>	White City Replacement Community Facility.	Replacement community facility.
SA21 <u>18</u>	Part of West Quay, The Docks.	Mixed use 'main town centre uses' and approximately 20 residential dwellings.
SA22	<del>Land adjacent to Secunda Way Industrial Estate</del>	<del>'B' class employment uses.</del>

## Site Allocation Statements

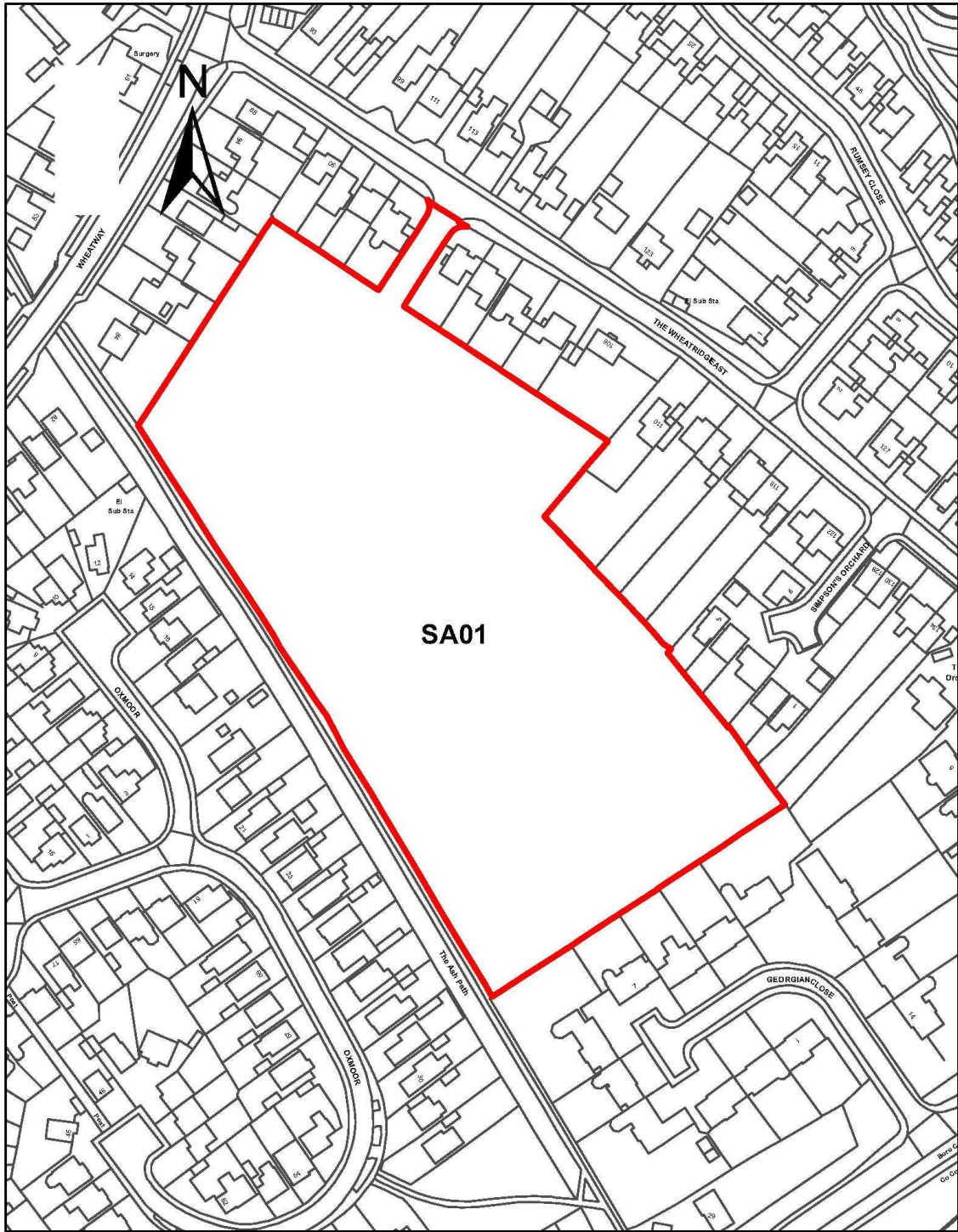
### Policy Site Allocation Statement SA01: Land at the Wheatridge

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



**Mineral Consultation Area (MCA)**

- **The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.**

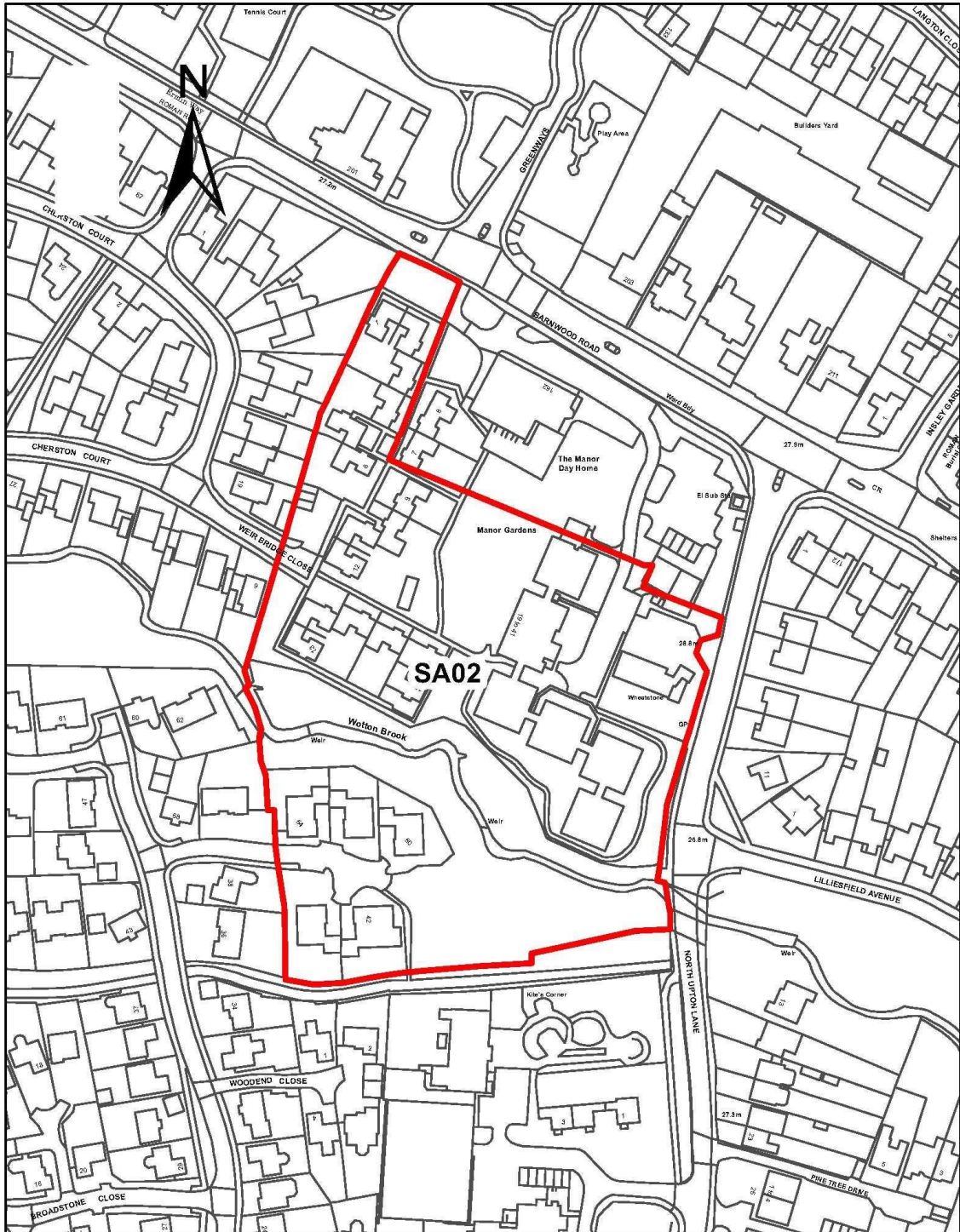


### Land at the Wheatridge

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**Policy Site Allocation Statement SA02: Land at Barnwood Manor**

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



## Land at Barnwood Manor

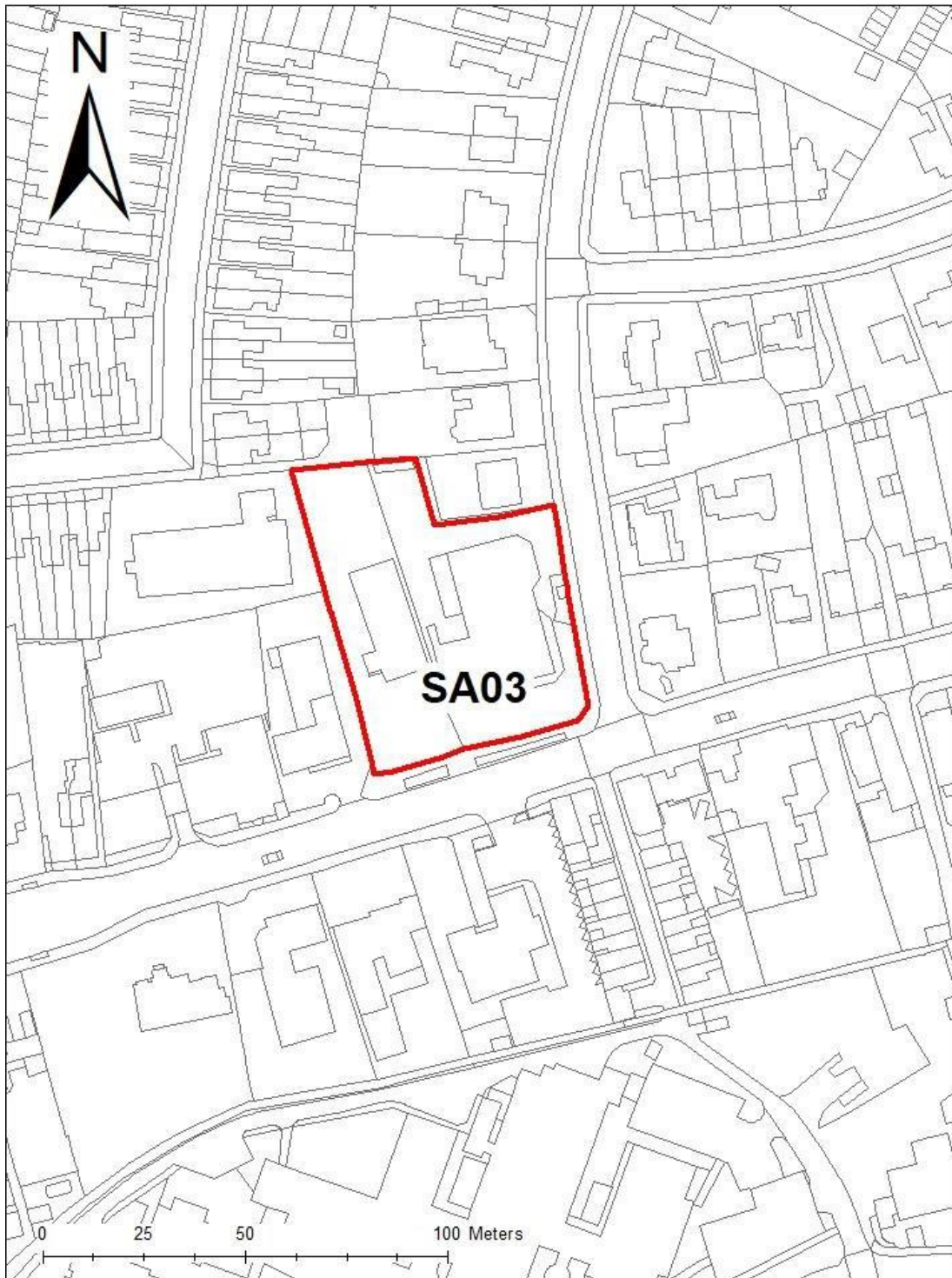
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**Policy Site Allocation Statement SA03: Former Prospect House, 67-69 London Road**

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3HF / E: 383906 N: 218911
Gross Site Area:	0.3540 ha.
Allocation:	Approximately <del>30</del> <b>60</b> residential dwellings. There is an expectation that the main existing building will be refurbished/repurposed.
<p><b>Description and overview</b></p> <p>A redundant office block in a prominent location on the corner of London Road and Heathville Road. The premises have been marketed by the landowner for a considerable period but have been vacant for several years. The site offers the opportunity for the redevelopment to provide a higher density residential scheme, in a location supported by high frequency public transport and near to the city centre and public transport hub.</p>	
<p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• Improve the architectural appearance of the buildings and the streetscene.</li> <li>• Careful consideration to be given to the relationship between the site and the existing residential properties on Heathville Road. Improve the public realm along London Road.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Site located within the London Road Conservation Area; new development must therefore positively respond to the London Road Conservation Area Appraisal and Management document.</li> <li>• Archaeological Assessment given proximity of location to Roman Road.</li> <li>• Refer to detailed Site Historic Environment Assessment (November 2016) which concludes that development would be allowed with mitigation.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• <del>Green roofs/walls should be utilised.</del></li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul>	



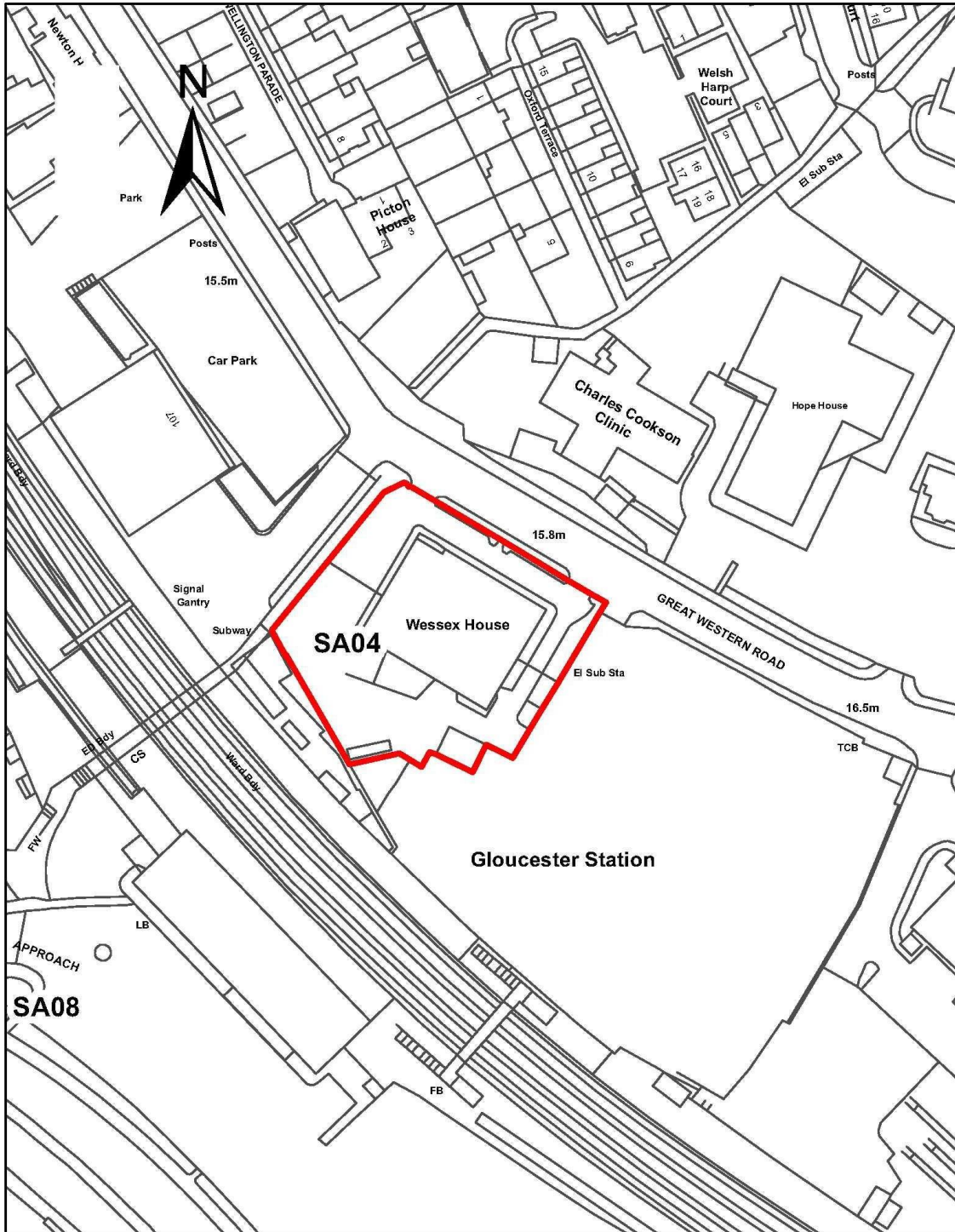


## 67 to 69 London Road

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**Policy Site Allocation Statement SA04: Former Wessex House, Great Western Road**

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3NF / E: 383701 N: 218632
Gross Site Area:	0.3 ha.
Allocation:	Approximately <del>20</del> <b>40</b> residential dwellings, temporary accommodation or mixed use.
<p><b>Description and overview</b>  A small, strategically located site close to Great Western Road underpass. Current building ‘Edmundson Electrical’ in the centre of the site is severely dilapidated and in need of demolition in order to facilitate development. The site offers the opportunity for higher density residential development or mixed-use given its very close proximity to the city centre and transport hub.</p>	
<p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• The site should be laid-out to provide direct overlooking and create active frontages to Great Western Road and the adjacent underpass.</li> <li>• Opportunity to widen the entrance into the underpass and create improved visibility.</li> <li>• Green buffer to be created alongside adjacent railway to mitigate against noise and air pollution from the railway.</li> <li>• Clearly defined public and private space, and appropriate boundary treatments will be important around the underpass.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Archaeological assessment.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Green roofs/walls should be utilised.</li> <li>• Creation of bat habitat and roosts as well as swift blocks and the provision for house martins.</li> </ul> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul>	



**Wessex House, Great Western Road**

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**Policy Site Allocation Statement SA05: Land at Great Western Road Sidings**

Ward / Postcode / GeoRef	Kingsholm and Wotton / GL1 3PZ / E: 384152 N: 218365
Gross Site Area:	4.3 ha.
Allocation:	Approximately <del>200</del> <b>300</b> residential dwellings.
<p>Description and overview</p> <p>Large brownfield site; an area of railway sidings close to Gloucestershire Royal Hospital on the junction of Great Western Road and Horton Road. The site offers the opportunity for a higher density scheme near the city centre and transport hub.</p>	
<p>Site specific requirements and opportunities</p> <p>Design and layout</p> <ul style="list-style-type: none"> <li>• Create a well-defined built frontage to Great Western Road.</li> <li>• Create a green link between Great Western Road and the southern end of Horton Road.</li> <li>• Increase tree coverage and create a more meaningful useable open space that connects to the hospital and could be utilised by hospital visitors.</li> <li>• Provision of appropriate crossing point to access open space.</li> </ul> <p>Open space</p> <ul style="list-style-type: none"> <li>• The site includes existing green space known as the ‘Great Western Road Rest Gardens’. This should be included and expanded within the wider redevelopment, to provide a functional area of open space including a Locally Equipped Area for Play.</li> </ul> <p>Highways and access</p> <ul style="list-style-type: none"> <li>• Implementation of a new strategic cycle and footway linking to city centre and transport hub to the west and the new residential development at the Allstone site to the east.</li> </ul> <p>Historic environment</p> <ul style="list-style-type: none"> <li>• Built heritage and ecological assessments.</li> <li>• Presence of historic steam engine shed is a non-designated heritage asset.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Creation of green corridor following the proposed walking/cycle route from Horton Road (with links to the Allstone site / Armscroft Park), through the sidings towards former Wessex House and railway station.</li> <li>• Creation of bat habitat/roosts.</li> <li>• Likely presence of nationally scarce invertebrates; any loss of brownfield habitat should be mitigated through brown roofs.</li> <li>• Bat survey: Building inspections (and any required emergence/re-entry surveys) if any buildings are scheduled to be removed or altered.</li> <li>• Birds survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> <li>• Invertebrates survey: To determine presence of important habitats for invertebrates.</li> </ul> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul>	

**Mitigation measures**

- **Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.**

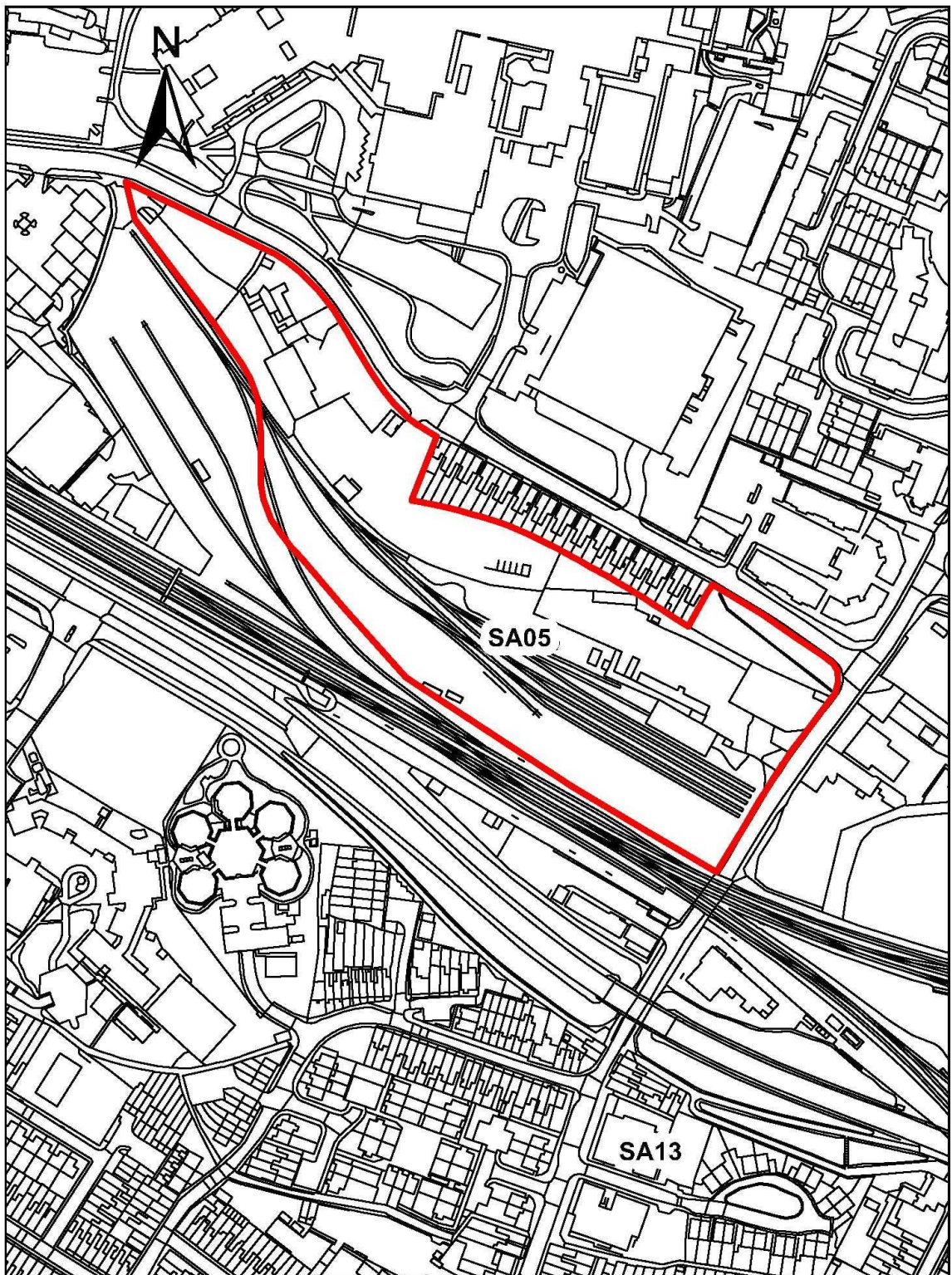
**Air Quality**

- Given the likely high density of development and the proximity of the site to existing potential sources of air pollution, all proposals for development should demonstrate their compliance in meeting EU limit values and national objectives for air pollutants. The development must be consistent with the Local Air Quality Action Plan.

**Other**

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





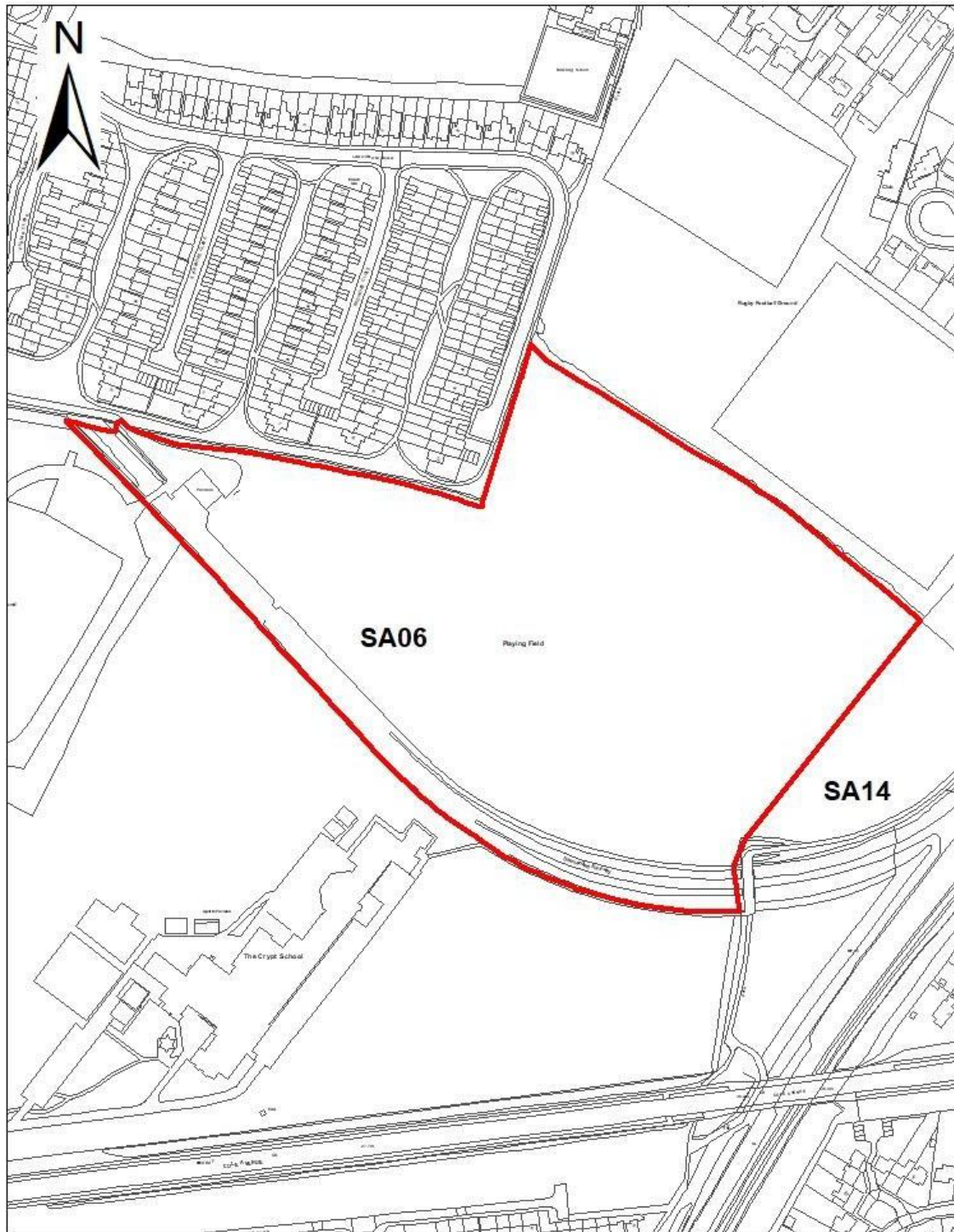
## Land at Great Western Road Sidings

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**Policy Site Allocation Statement SA06: Blackbridge Sports and Community Hub**

Ward / Postcode / GeoRef	Podsmead / GL1 5TY (closest) / E: 382935 N: 215862
Gross Site Area:	9.7 ha
Allocation:	Multi-use sports, physical activity and community hub, to include a full-sized 3G artificial surface, grass playing fields and a multi-use health and wellbeing facility.
<p><b>Description and overview</b></p> <p>Historically used as playing fields, this site has been identified in the Playing Pitch Strategy and Built Sports Facility Strategy as a priority for a multi-sports and community hub within the Podsmead community, but with a city-wide reach. It also provides opportunities for physical activity beyond formal sport. The development should include a multi-use health and wellbeing facility to provide for the needs of the local community and those arising from the delivery of sports facilities with the city-wide catchment.</p>	
<p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• Careful consideration needs to be given to the access route into the site and the boundary treatments.</li> <li>• An improved street presence and adequate parking will need to be provided.</li> <li>• Opportunity to improve visibility and instate a footpath to the eastern side of Podsmead Road.</li> <li>• Safe and secure routes will be needed between the facilities and its potential users.</li> </ul> <p><b>Gloucester Athletics Club</b></p> <ul style="list-style-type: none"> <li>• Incorporation of the adjacent Gloucester Athletics Club into the wider site to secure a seamless multi-sports venue. Protection of the amenity and facilities currently enjoyed by the club.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Any requirements for upfront information and mitigation would depend on the scale and impact of any proposal.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Incorporation of and improvements to the dismantled railway cutting, currently an extensive area of brambles, shrubs and small trees including apples and damson. This area forms a potential Local Wildlife Site and is identified as having considerable potential for enhancing local conservation value and protection/enhancement of a key ecological corridor within an urban environment.</li> </ul> <p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Surface water runoff from the site is considered to contribute to flood risk in the downstream catchment; redevelopment provides an opportunity for flood risk mitigation for the wider area. Any development should therefore implement a robust Sustainable Drainage System (SuDS).</li> </ul>	



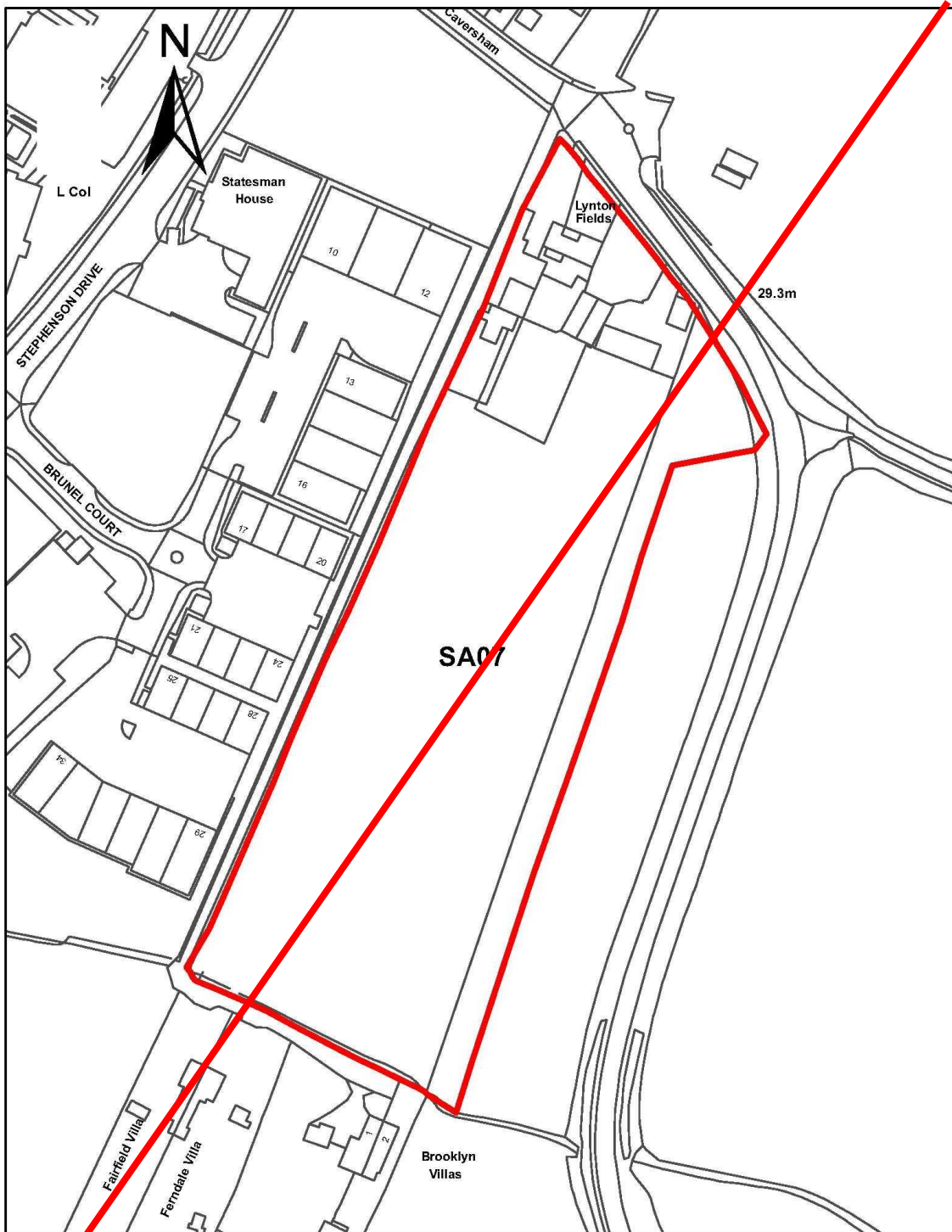


## Blackbridge Sports & Community Hub

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

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



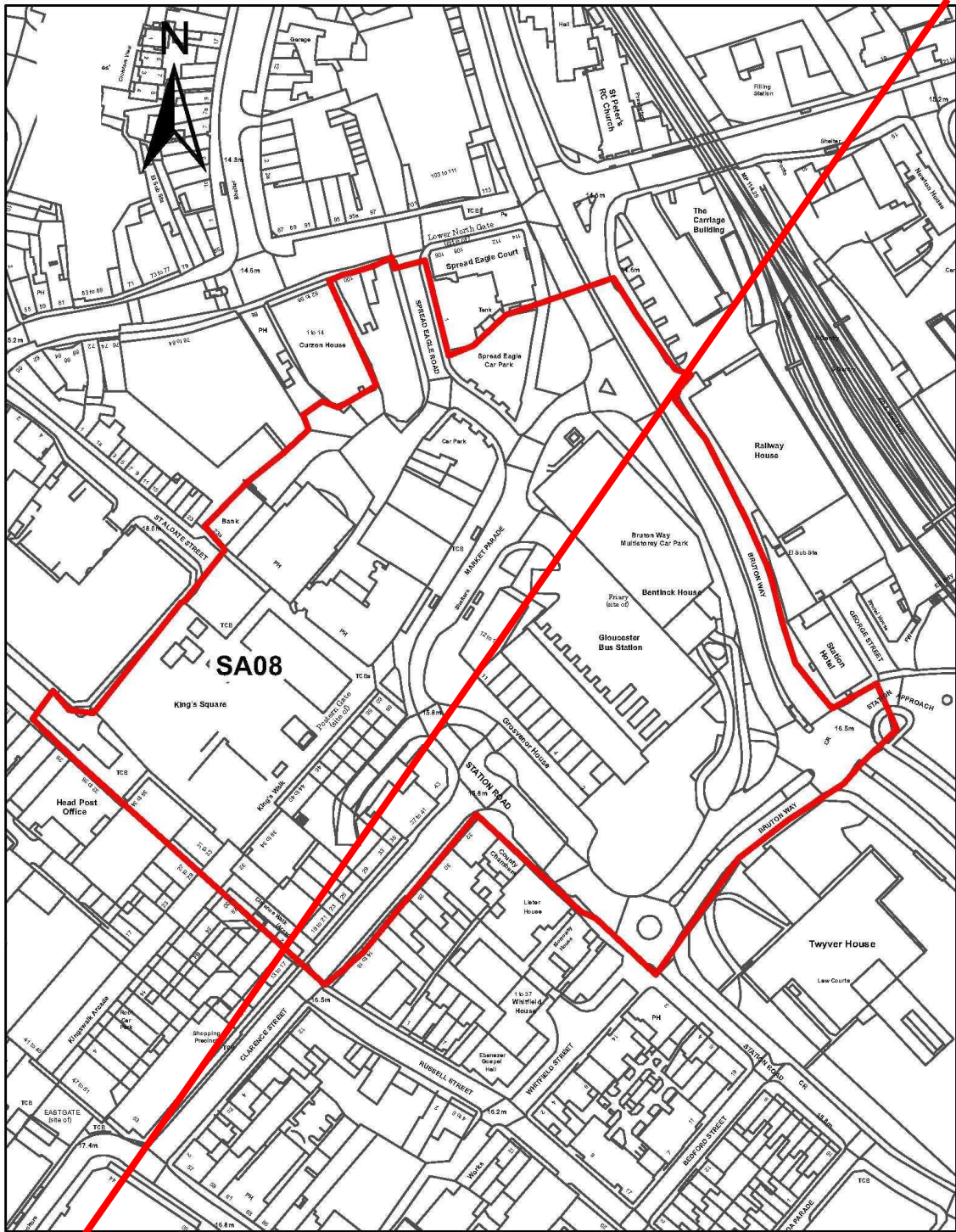
**Lynton Fields, Land East of Waterwells Business Park**

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## Policy SA08: King's Quarter

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

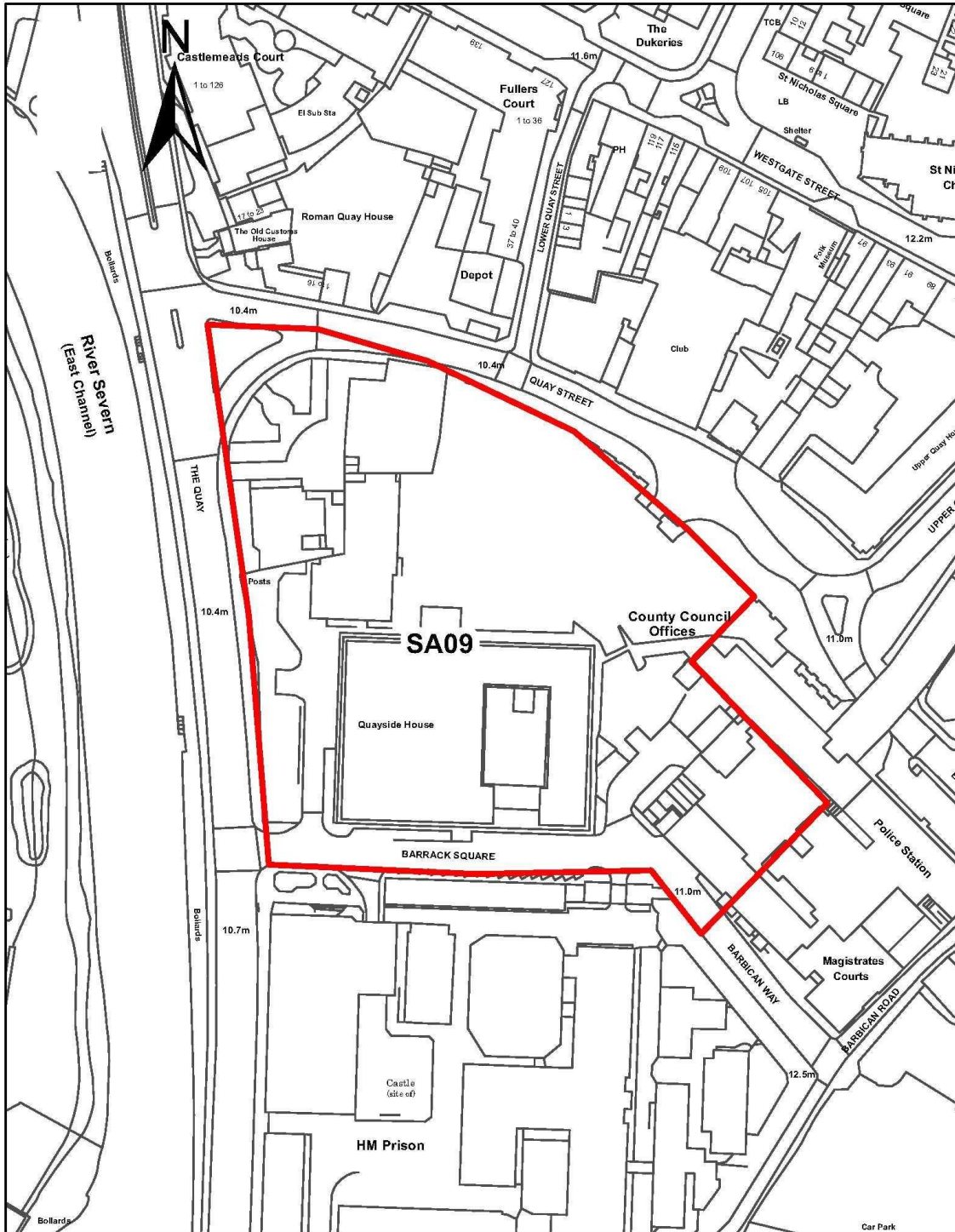


## Kings Quarter

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**Policy Site allocation Statement SA0907: Former Quayside House, Blackfriars**

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



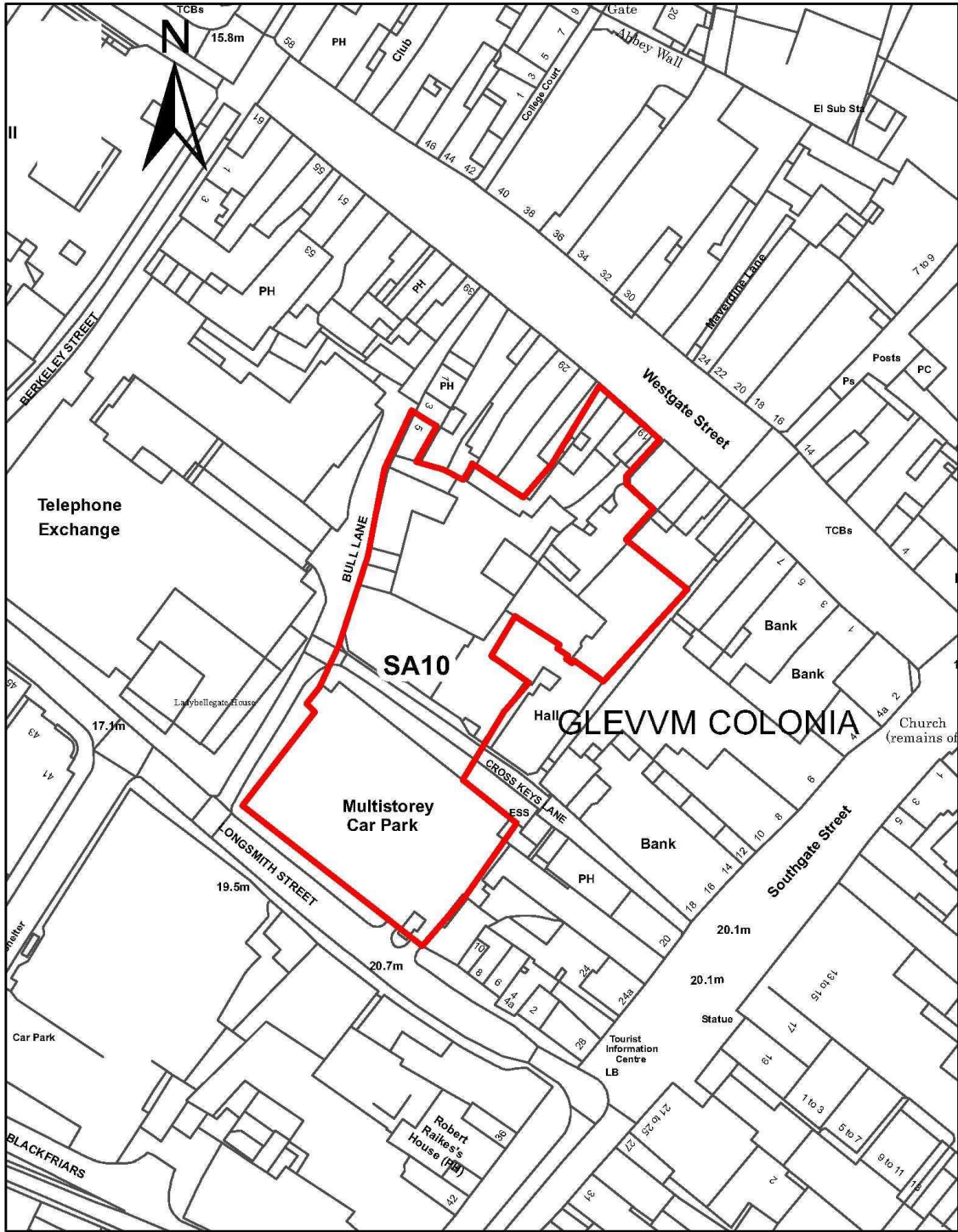
**Former Quayside House - Greater Blackfriars**

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**Policy Site Allocation Statement SA1008: Former Fleece Hotel & Longsmith Street Car Park**

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





## Former Fleece Hotel and Longsmith Street Car Park

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**Policy Site Allocation Statement SA1109: Land rear of St Oswalds Retail Park**

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

- The site is in close proximity of Priory Road AQMA, all proposals for development should demonstrate their compliance in meeting EU limit values and national objectives for air pollutants. The development must be consistent with the Local Air Quality Action Plan.

#### **Land contamination**

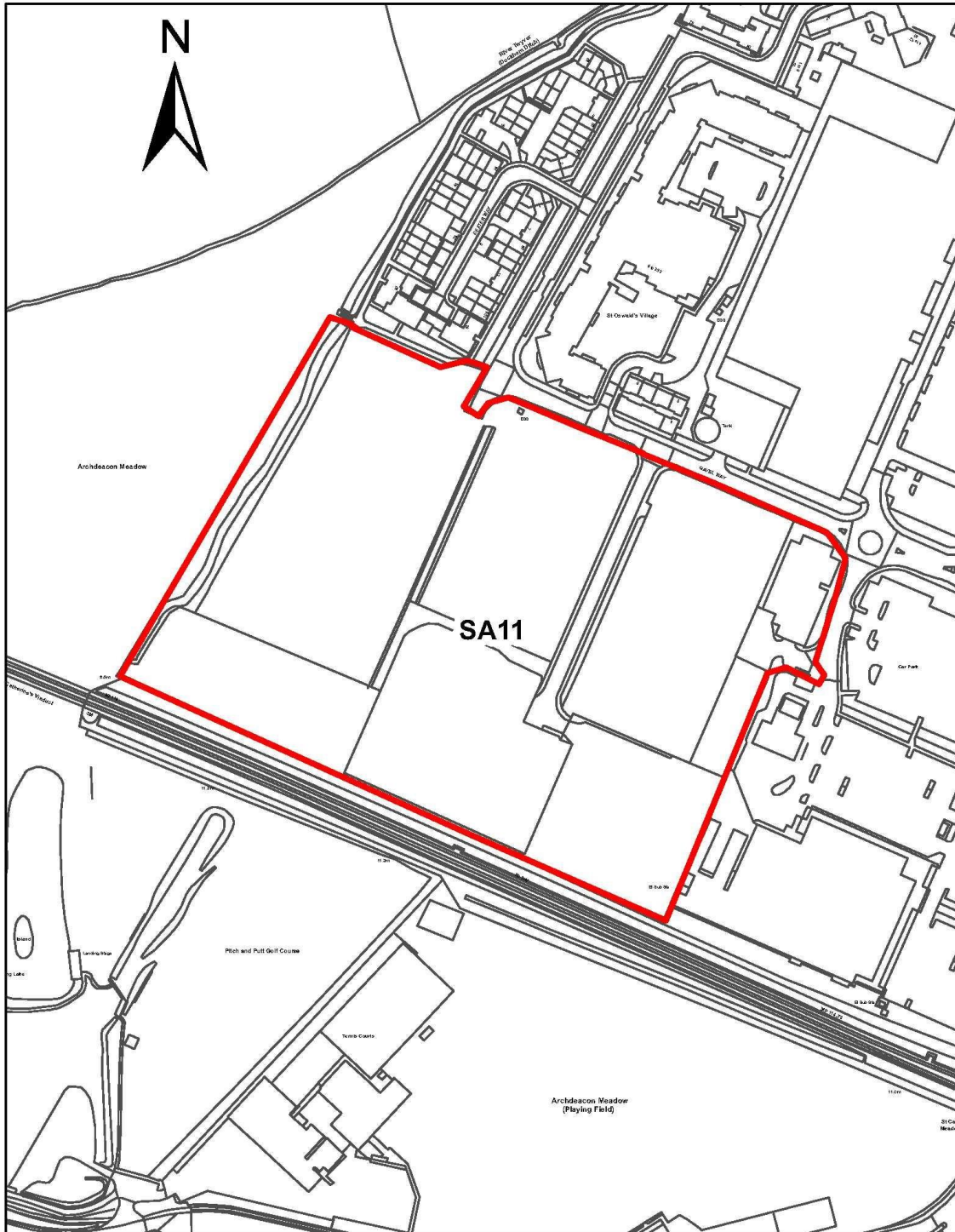
- **The site allocation lies within an area subject to historic unlicensed landfill activity. Consequently, an appropriate land contamination risk assessment and options appraisal may be required. Early engagement with the Environment Agency in respect of this matter is strongly encouraged.**

#### **Flood risk**

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

#### **Ground & Surface Water Quality**

- **Development proposals will adopt specific drainage techniques to address the problems of previous contamination and land movement. This is in the interests of protecting ground and surface water quality.**



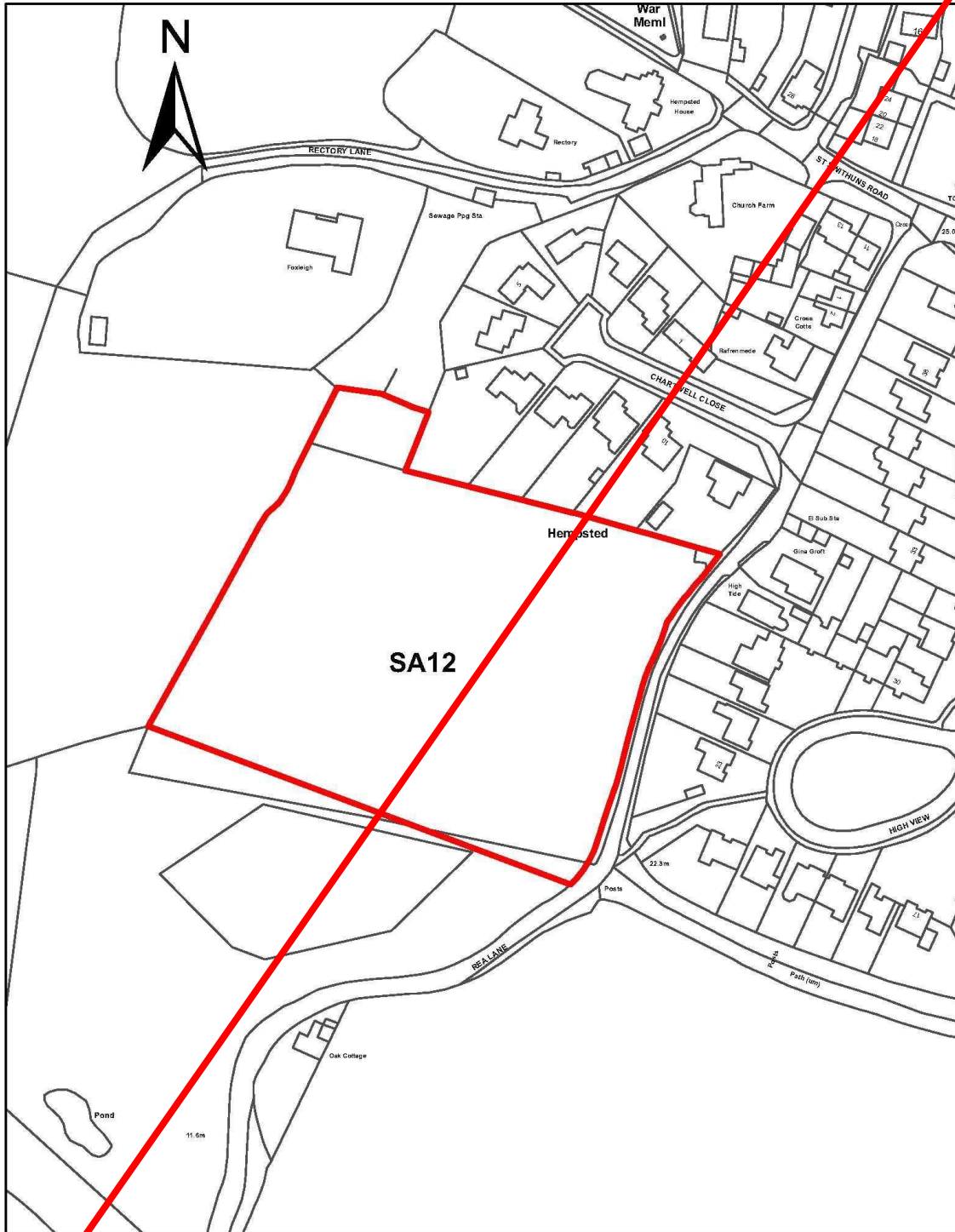
## Land at St Oswald's

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## Policy SA12: Land at Rea Lane, Hempsted

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



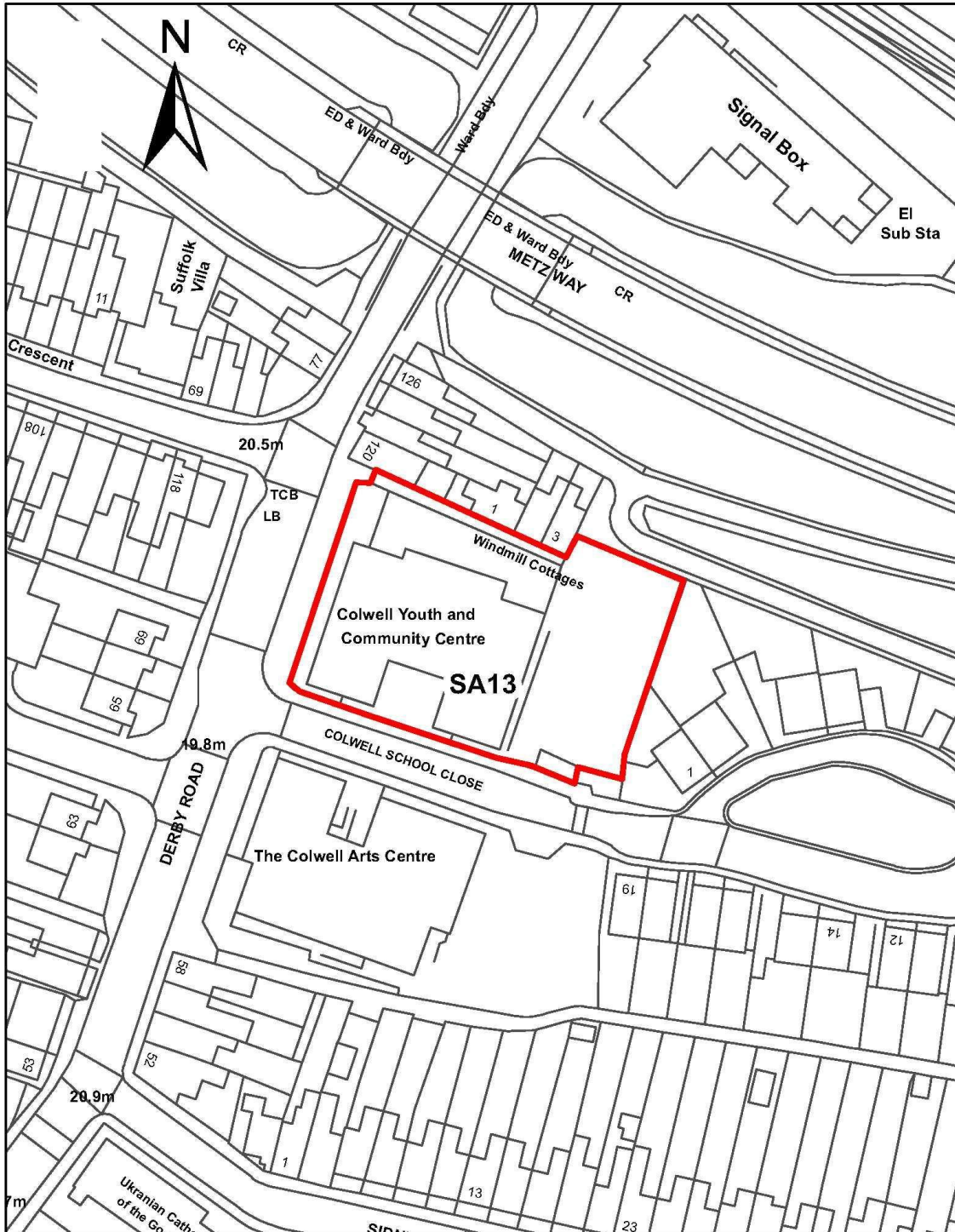


### Land at Rea lane

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**Policy Site Allocation Statement SA1310: Former Colwell Youth & Community Centre**

Ward / Postcode / GeoRef	Barton & Tredworth / GL1 4BD (nearest Sydney Street) / E: 384220 N: 218107
Gross Site Area:	0.18 ha.
Allocation:	Residential: Approximately 20 dwellings.
<p><b>Description and overview</b>                  Redundant former school building and car park. The site provides the opportunity to provide new homes in a predominantly residential area. The building should be retained and converted.</p> <p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• The building and the boundary treatments should be preserved and enhanced to make the most of this attractive building that makes a positive contribution to the streetscene.</li> <li>• Any proposed new development to the car park area will need to be considerate to the amenity of the adjacent existing two-storey residential properties.</li> <li>• Overlooking of the pedestrian link to Metz way is encouraged provided it can be achieved whilst being sensitive to the amenity of the adjacent residential properties.</li> <li>• Any proposed solar panels to the roof will need to be assessed to ensure there is no glint caused to the users of the elevated roadway Metz Way.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Existing building is considered a candidate for the 'Local List' in the City Council's Townscape Character Appraisal (2019).</li> <li>• Built Heritage Assessment of significance and character.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Incorporate green roofs or walls as part of any development of this site.</li> </ul> <p><b>Mineral Consultation Area (MCA)</b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>	



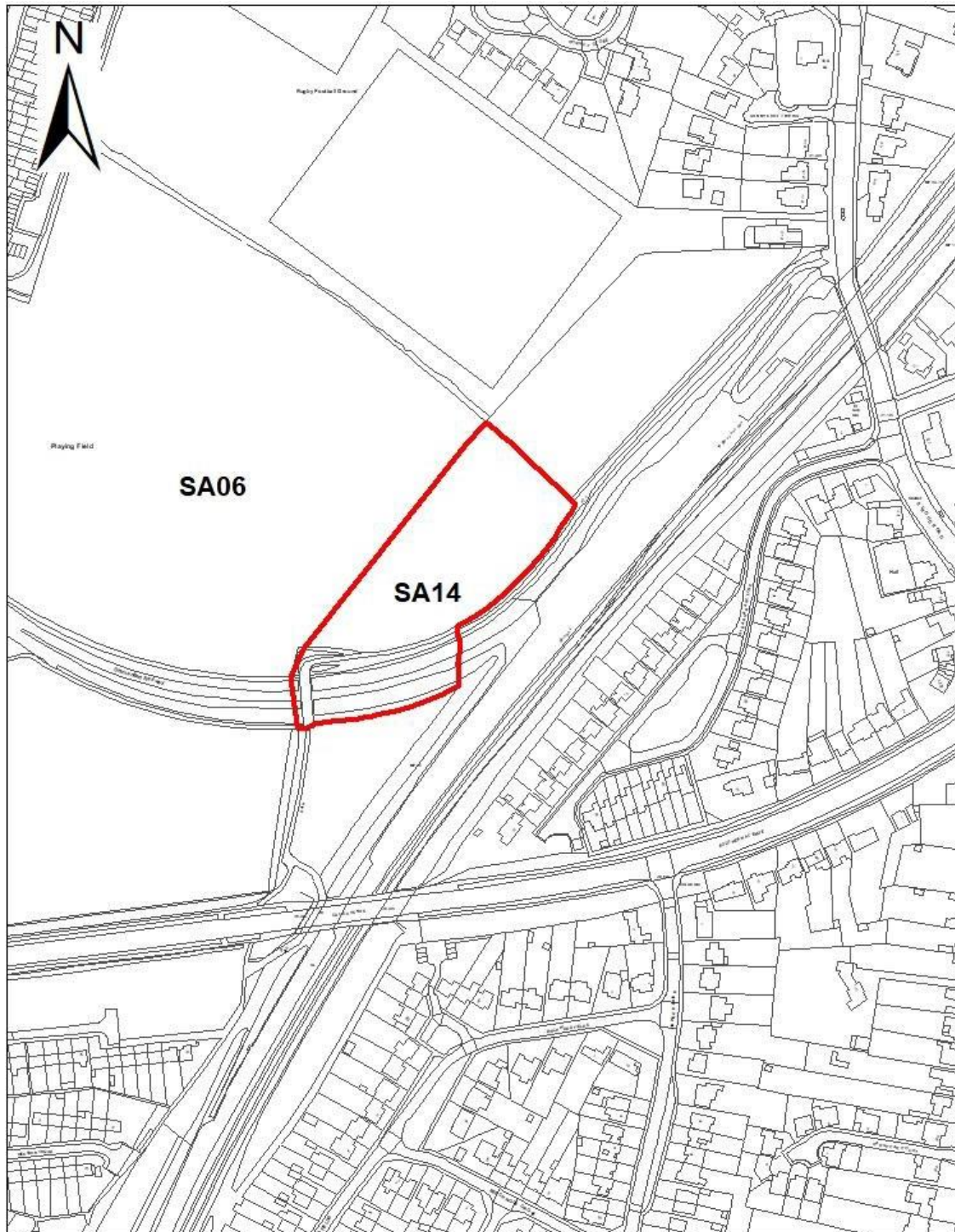
**Former Colwell Youth & Community Centre**

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**Policy Site Allocation Statement SA1411: Land off New Dawn View**

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





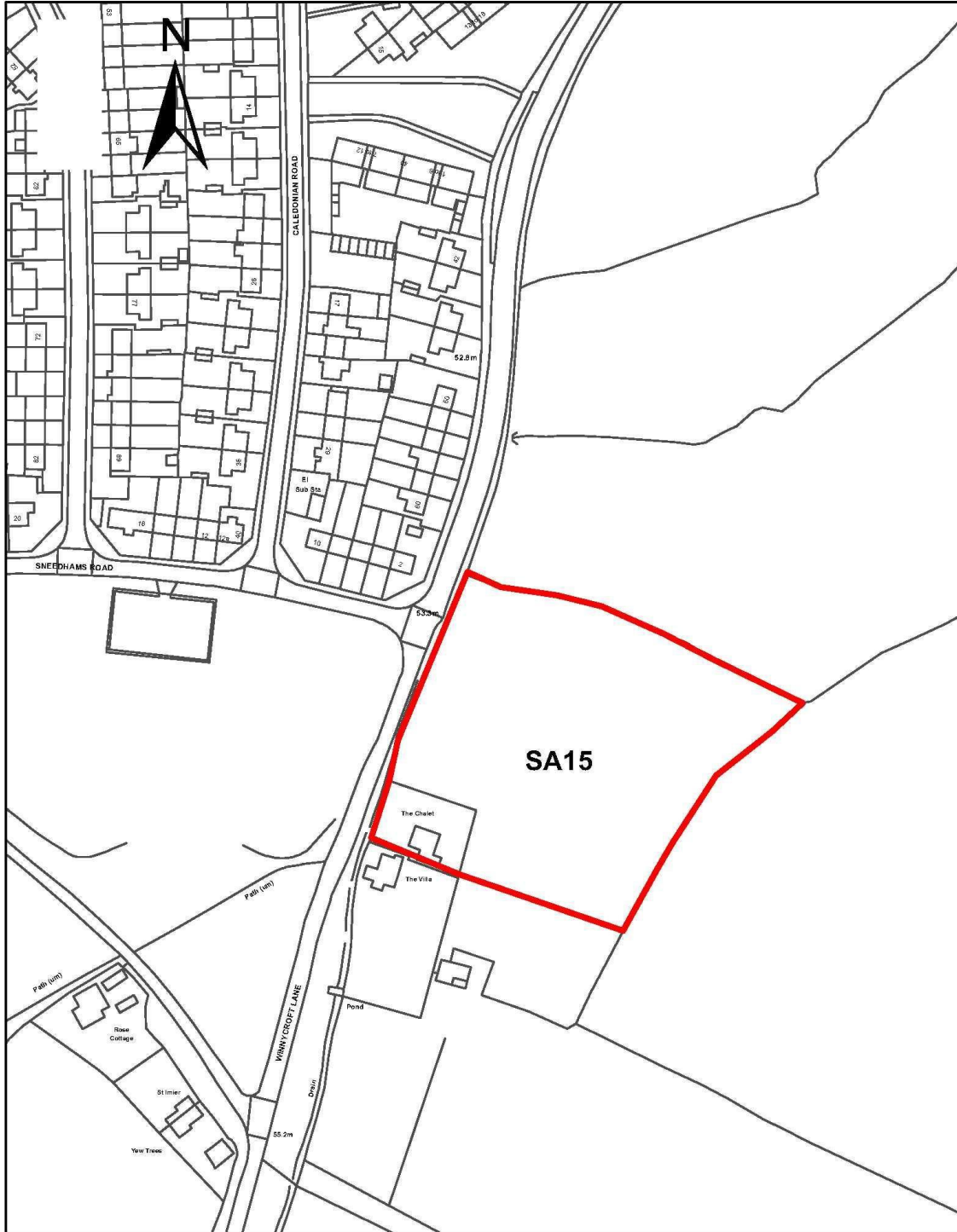
### Land off New Dawn View

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**Policy Site Allocation Statement SA1512: Land South West of Winneycroft Allocation**

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



### Land South of Winneycroft Allocation

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**Policy Site Allocation Statement SA1613: Land off Lower Eastgate Street**

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



### Land off Lower Eastgate Street

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**Policy Site Allocation Statement SA1714: Land South of Triangle Park  
(Southern Railway Triangle)**

Ward / Postcode / GeoRef	Elmbridge / GL4 3JS (nearest) / E: 384603 N: 217834
Gross Site Area:	4.2 ha
Allocation:	B1 / B8 Class Employment use
<p><b>Description and overview</b>  This site is currently used by Network Rail for operational purposes. However, this will cease during the plan period. The site provides an opportunity for an extension to the successful 'Triangle Park' to the north and is therefore allocated for B use employment.</p>	
<p><b>Site specific requirements and opportunities</b></p> <p><b>Design and layout</b></p> <ul style="list-style-type: none"> <li>• Consideration to be given to the views of the site from the Metz Way and the railway line approaches.</li> <li>• Design should be of a high quality that is locally distinctive and positive given this site forms an entrance point into the city particularly for rail users</li> <li>• Create appropriate <b>15m</b> planting buffers to help mitigate any noise, vibration and air pollution from the railway line and integrate with the wider GI network.</li> </ul> <p><b>Highways and access</b></p> <ul style="list-style-type: none"> <li>• Access via existing route of Metz Way, with link into site via Metz Way bridge.</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• Archaeological Assessment given previous use of the site.</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Green infrastructure contributions between Ayland Gardens and Overbury Road (the closest opportunity to the site). Further consider Green Infrastructure connectivity to Former Great Western Road Sidings (Site Allocation SA5).</li> <li>• Creation and retention of suitable habitat for invertebrates and reptiles and other brownfield site species.</li> <li>• Green roofs and walls should also be utilised on site.</li> <li>• Bat survey: Building inspections (and any required emergence/re-entry surveys) if any buildings are scheduled to be removed or altered and bat activity surveys.</li> <li>• Badger survey: To assess presence.</li> <li>• Bird survey: Not required, but vegetation scheduled for removal between March and August must be checked for evidence of breeding birds.</li> <li>• Reptile survey: To assess presence.</li> </ul> <p><b><u>Mineral Consultation Area (MCA)</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand &amp; gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</u></b></li> </ul> <p><b><u>Mitigation measures</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.</u></b></li> </ul>	



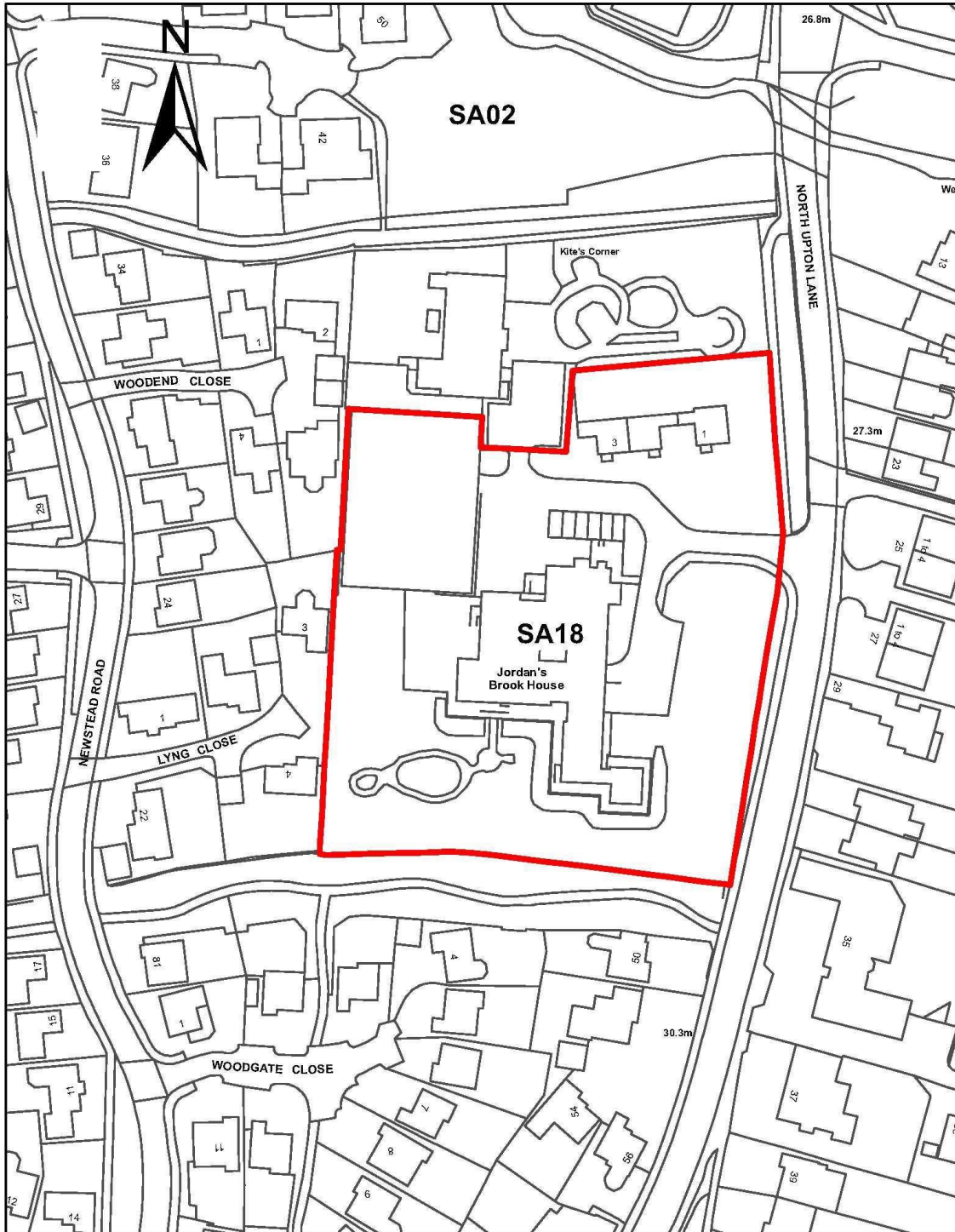


**Land South of Triangle Park (Southern Railway Triangle)**

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**Policy Site Allocation Statement SA1815: Jordan's Brook House**

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



## Jordan's Brook House

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## Policy Site Allocation Statement SA1916: Land off Myers Road

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





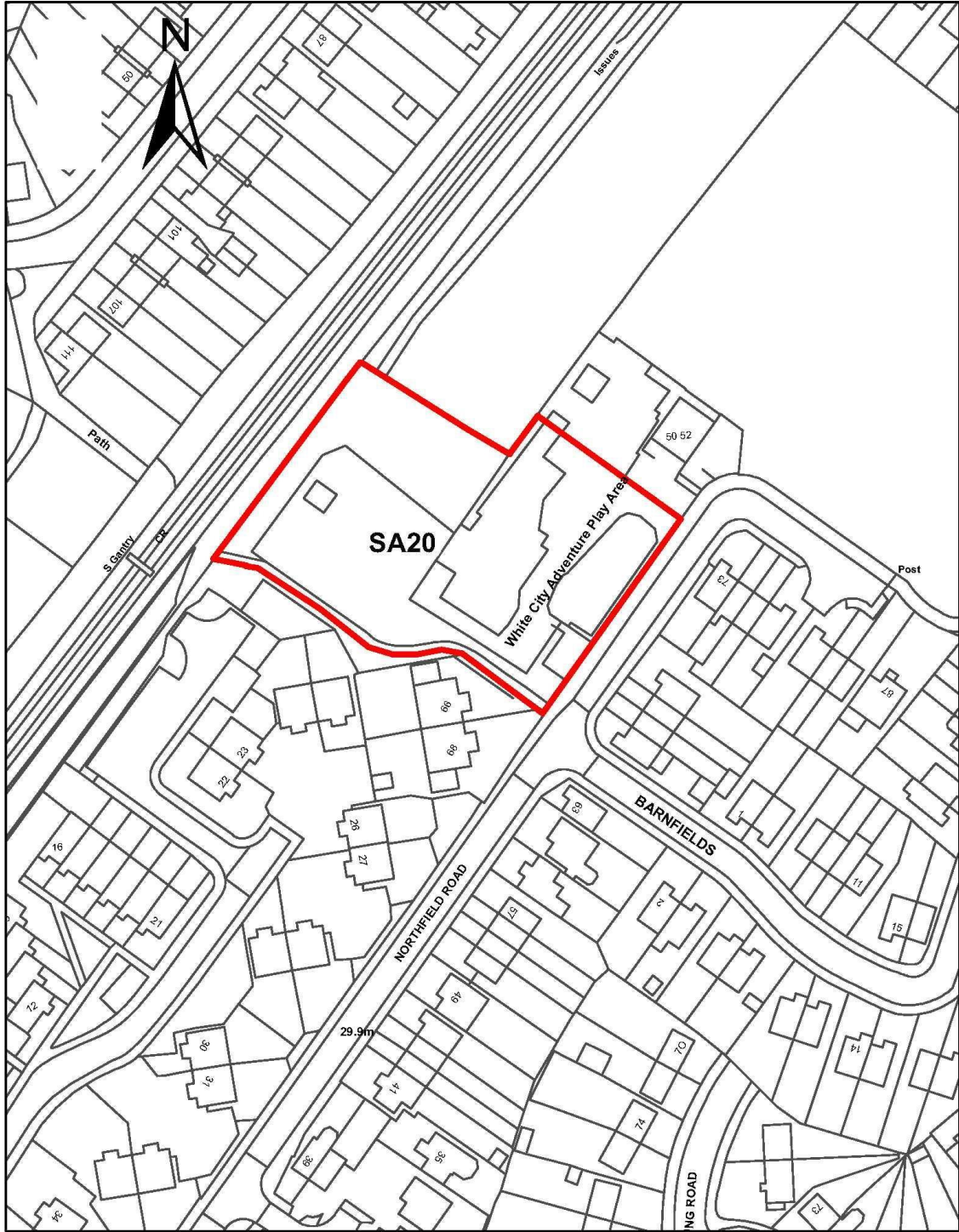
## Land off Myers Road

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**Policy Site Allocation Statement SA2017: White City Community Facility**

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

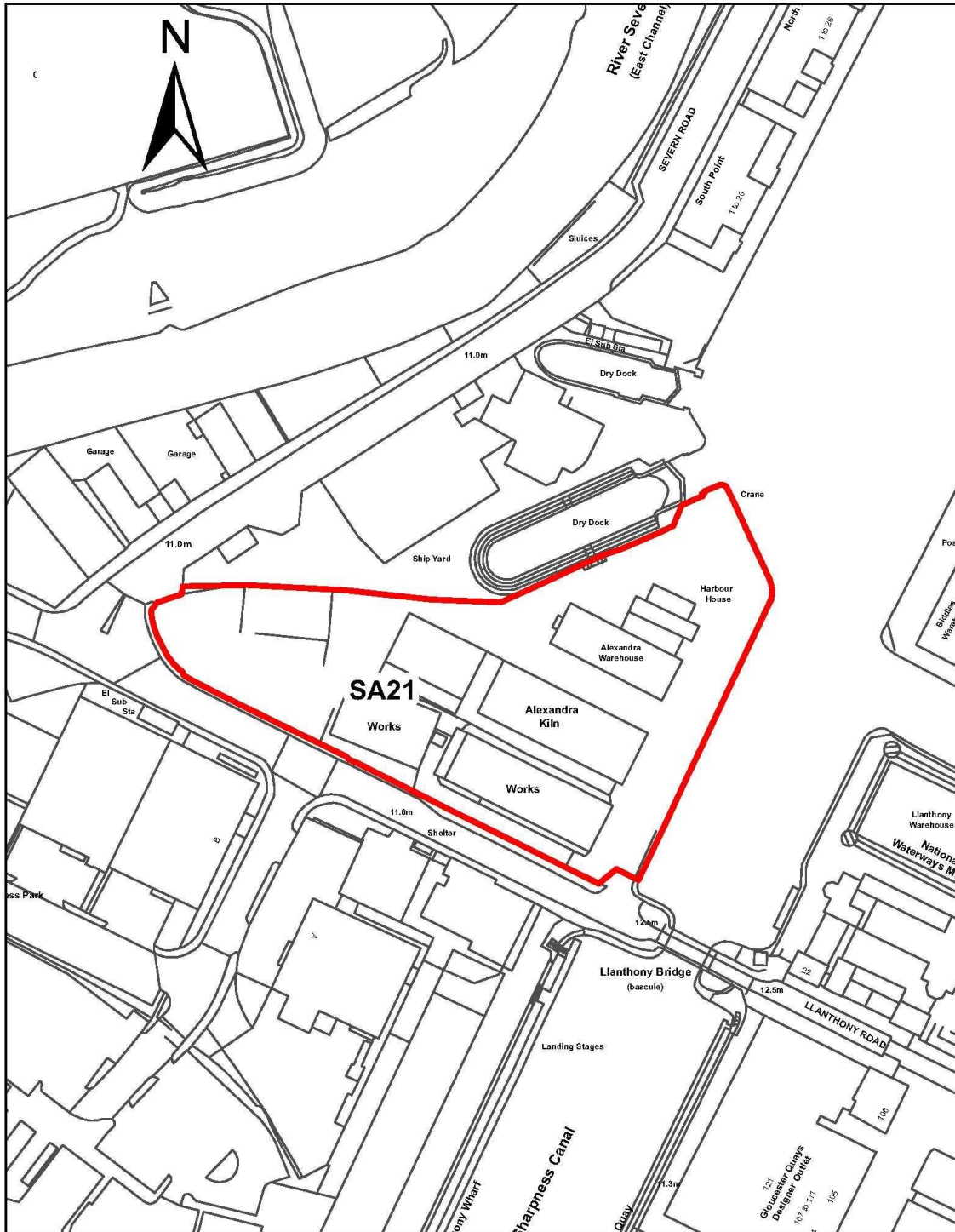


## White City Replacement Community Facility

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**Policy Site Allocation Statement SA2118: Part of West Quay, the Docks**

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



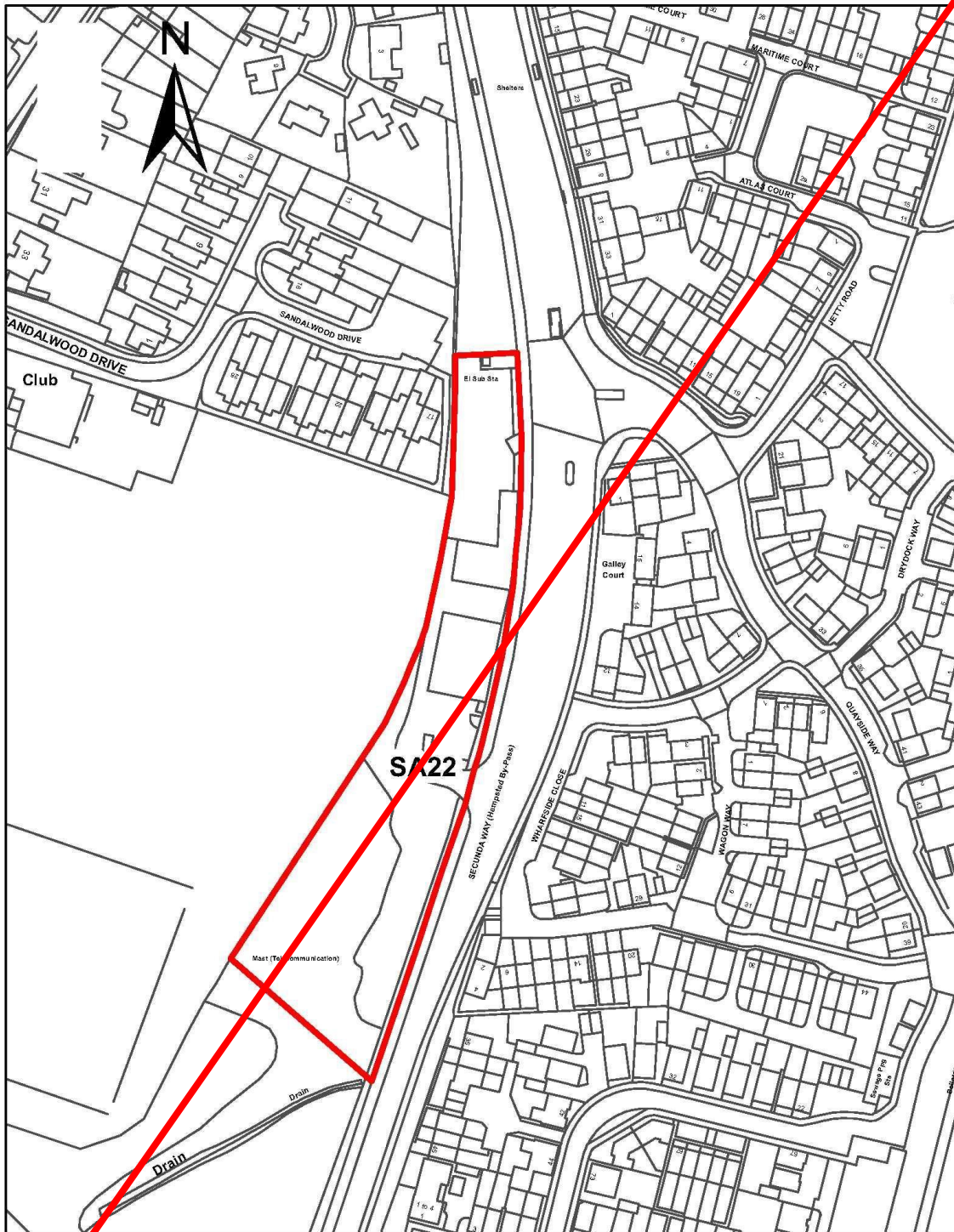
### Part of West Quay, The Docks

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

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





**Land adjacent to Secunda Way Industrial Estate**

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## 6 MONITORING FRAMEWORK

6.1 The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a monitoring framework, which ~~are~~ is directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required is easily available and reliable.

### A: Housing

JCS INDICATOR	SOURCE	FREQUENCY
Net affordable housing completions against annual requirements.	Housing monitoring / internal	Annual
<b><u>Net dwelling completions, based on the set housing requirements and 5-year housing supply.</u></b>	<b><u>Annual housing monitoring</u></b>	<b><u>Annual</u></b>
<b><u>Net completions of Gypsy, Traveller and Travelling Showpeople accommodation, against requirements, based on the set target.</u></b>	<b><u>Annual housing monitoring</u></b>	<b><u>Annual</u></b>
CITY PLAN INDICATOR	SOURCE	FREQUENCY
Percentage of affordable housing granted on schemes of 10+ dwellings.	Housing monitoring / internal	Annual
Average density of residential development (city centre, outside of city centre).	Housing monitoring / internal	Annual
Net student accommodation units completed.	Housing monitoring / internal	Annual
Serviced self/custom build plots granted planning permission and taken up.	Housing monitoring / internal	Annual
Percentage of Category 2 and Category 3 homes consented against policy requirements.	Housing monitoring / internal	Annual
<b><u>Net specialist housing units completed, supported by specialist housing Commissioner.</u></b>	<b><u>Housing monitoring / internal</u></b>	<b><u>Annual</u></b>

### B: Employment development, culture and tourism

JCS INDICATOR	SOURCE	FREQUENCY
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Percentage of residents with NVQ Level 4 qualification and Above.	ONS	Annual
Amount of employment land lost to other non-employment generating uses.	Employment monitoring / internal	Annual
Net additional jobs created by sector (employment generating uses).	GCC Inform / ONS / NOMIS	Annual
Economically active persons aged 16 – 64.	GCC Inform / ONS / NOMIS	Annual
Net amount of employment floorspace created by use class (employment generating uses).	GCC Inform / ONS / NOMIS	Annual
Gross weekly earnings of full-time workers.	GCC Inform / ONS / NOMIS	Annual
Net new business start-ups.	GCC Inform / ONS / NOMIS	Annual
CITY PLAN INDICATOR	SOURCE	FREQUENCY
Public houses lost to alternative forms of Development.	Internal	Annual
<b><u>Employment land allocations Delivered.</u></b>	<b><u>Employment monitoring / Internal</u></b>	<b><u>Annual</u></b>
<b><u>Number of major developments with an agreed Employment and Skills Plan.</u></b>	<b><u>Employment monitoring /Internal</u></b>	<b><u>Annual</u></b>

#### C: Healthy communities

CITY PLAN INDICATOR	SOURCE	FREQUENCY
Number of essential community facilities lost or gained through the development process.	Internal	Annual
Number of air quality management areas.	Internal	Annual
CITY PLAN INDICATOR	SOURCE	FREQUENCY
Net again of 'Changing Places' Toilets.	Annual monitoring report / internal	Annual
Gap in life expectancy.	Gloucestershire County Council – Public Health	Annual
Adults in physical activity.	Gloucestershire County Council – Public Health	Annual
National Child Measurement Data.	Gloucestershire County Council – Public Health	Annual

<b><u>Hot food takeaways granted planning permission within 400m of a secondary school or college access point.</u></b>	<b><u>Annual monitoring report /internal</u></b>	<b><u>Annual</u></b>
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D: Historic environment

JCS INDICATOR	SOURCE	FREQUENCY
Listed Buildings, Conservation Areas and Scheduled monuments on the 'at risk register'.	Internal	Annual
Net changes in the number of Listed Buildings, Registered Parks and Gardens, Battlefield and sites of archaeological importance, including Scheduled Monuments.	Internal	Annual
CITY PLAN INDICATOR	SOURCE	FREQUENCY
Numbers of buildings at risk removed from the register.	Internal	Annual
Numbers of listed buildings with implemented conversions of vacant upper floors to active use.	Internal	Annual
Numbers of grant schemes Implemented.	Internal	Annual
Records added to the historic environment record through development implementation.	Internal	Annual
Number of outreach and engagement events.	Internal	Annual
Enforcement against new shop fronts and signage.	Internal	Annual

E: Natural Environment

JCS INDICATOR	SOURCE	FREQUENCY
Net changes to Key Wildlife Sites, Special Areas of Conservation, SSSIs, Special Protection Areas, Ramsar sites and other protected areas.	Internal	Annual
Condition of SSSIs and other areas of landscape and biodiversity importance.	Internal	Annual
New developments incorporating Sustainable Urban Drainage Systems.	Internal	Annual

Number of planning permissions granted contrary to Environment Agency advice on flooding of water quality Grounds.	Internal	Annual
CITY PLAN INDICATOR	SOURCE	FREQUENCY
Planning permissions granted that utilise the renewable energy potential of the River Severn and canal.	Internal	Annual

<b><u>Number of developments permitted that do not achieve biodiversity net gain (on site or off site).</u></b>	<b><u>Annual monitoring report /internal</u></b>	<b><u>Annual (interim)</u></b>
<b><u>Net gain in biodiversity units.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>

F: Design

JCS INDICATOR	SOURCE	FREQUENCY
None	-	-
CITY PLAN INDICATOR	SOURCE	FREQUENCY
<b><u>Number of new homes permitted that fall below Nationally Described Space Standards.</u></b>	<b><u>Annual monitoring report /internal</u></b>	<b><u>Annual</u></b>

G: Sustainable living, transport and infrastructure

JCS INDICATOR	SOURCE	FREQUENCY
Increase use of bus.	Gloucestershire County Council – Local Transport Plan monitoring.	Annual
Increase use of cycling.	Gloucestershire County Council – Local Transport Plan monitoring.	Annual
Increased use of rail.	Gloucestershire County Council – Local Transport Plan monitoring.	Annual
Journey time reliability on primary strategic routes.	Gloucestershire County Council – Local Transport Plan monitoring.	Annual
Number of peak hour vehicle journeys.	Gloucestershire County Council – Local Transport Plan monitoring.	Annual
CITY PLAN INDICATOR	SOURCE	FREQUENCY



Number of planning applications failing to meet full policy requirements and subject to a review mechanism within S106.	Internal	Annual
<b><u>Number of dwellings permitted without secure cycle parking.</u></b>	<b><u>Annual monitoring report / internal</u></b>	<b><u>Annual</u></b>
<b><u>Number of dwellings permitted without car charging Infrastructure.</u></b>	<b><u>Annual monitoring report /internal</u></b>	<b><u>Annual</u></b>
<b><u>Number of dwellings permitted without full-fibre broadband Connectivity.</u></b>	<b><u>Annual monitoring report /internal</u></b>	<b><u>Annual</u></b>

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

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

## Joint Core Strategy 2011-2031 – Strategic Policies

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

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

Vision
Key Principles
Policy A1: Effective and efficient use of <b>housing</b> , land and buildings
Policy A2: <del>Affordable Housing Policy</del> <b>Houses in Multiple Occupation</b>
Policy A3: Estate regeneration

Policy A4: Student accommodation
Policy A5: Specialist housing
Policy A6: Accessible and adaptable homes
Policy A7: Self-build and custom-build homes
Policy A8: Static caravan sites
Policy A9: Extensions to existing dwellings
Policy A10: Annexes to existing dwellings
Policy B1: Employment and skills plans
Policy B2: Safeguarding employment sites
Policy B3: New employment development and intensification and improvements to existing employment land
Policy B4: Development within and adjacent to Gloucester Docks and Canal
Policy B5: Tourism and culture
Policy B6: Protection of public houses
Policy C1: Active design and accessibility
Policy C2: Allotments
Policy C3: Open space, playing fields and sports facilities
Policy C4: Hot food takeaways
Policy C5: Air quality
Policy C6: Cordon sanitaire: <b>Netheridge Sewage Treatment Works</b>
Policy C7: Fall prevention from taller buildings
Policy C8: Changing Places Toilets
Policy D1: Historic environment
Policy D2: Non-designated heritage assets
Policy D3: Recording and advancing understanding of heritage assets
Policy D4: Views of the Cathedral and historic places of worship
Policy E1: Biodiversity and geodiversity
Policy E2: Nature Recovery Area
Policy E3: Green/blue infrastructure
Policy E4: Flooding, sustainable drainage, and wastewater
Policy E5: Renewable energy potential of the River Severn and Canal
Policy E6: Development affecting Cotswold Beechwoods Special Area of Conservation
Policy E7: Trees, woodlands and hedgerows
Policy F1: Materials and finishes
Policy F2: Landscape and planting
Policy F3: Community safety
Policy F4: Gulls
Policy F5: Open plan estates
Policy F6: Nationally Described Space Standards
Policy F7: Shopfronts, shutters and signs
Policy G1: Sustainable transport <b>and parking</b>
Policy G2: Charging infrastructure for electric vehicles
Policy G3: Cycling
Policy G4: Walking
Policy G5: Broadband connectivity
Policy G6: Telecommunications infrastructure
Policy G7: Water Efficiency
Policy G8: Review mechanism
Policy SA: Site allocations

## Article 4 Directions

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

## Gloucester City Plan – Strategic Policies

Vision
Key Principles
Policy A2: Affordable housing
Policy A6: Accessible and adaptable homes
Policy B2: Safeguarding employment sites
Policy B3: New employment development and intensification and improvements to existing employment land
Policy C6: Cordon Sanitaire
Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation
Policy F6: Nationally Described Space Standards
Policy G8: Review mechanism
Site allocations SA01 to SA22
Policy SA01: Land at the Wheatridge
Policy SA02: Land at Barnwood Manor
Policy SA03: Former Prospect House, 67 – 69 London Road
Policy SA04: Former Wessex House, Great Western Road
Policy SA05: Land at Great Western Road Sidings
Policy SA06: Blackbridge Sports and Community Hub
Policy SA07: Lynton Fields, Land East of Waterwells Business Park
Policy SA08: King's Quarter
Policy SA09: Former Quayside House, Blackfriars
Policy SA10: Former Fleece Hotel & Longsmith Street Car Park
Policy SA11: Land rear of St Oswalds Retail Park
Policy SA12: Land at Rea Lane, Hempsted
Policy SA13: Former Colwell Youth & Community Centre
Policy SA14: Land off New Dawn View
Policy SA15: Land South of Winnycroft Allocation
Policy SA16: Land off Lower Eastgate Street
Policy SA17: Land South of Triangle Park (Southern Railway Triangle)
Policy SA18: Jordan's Brook House
Policy SA19: Land off Myers Road
Policy SA20: White City Replacement Community Facility
Policy SA21: Part of West Quay, The Docks
Policy SA22: Land adjacent to Secunda Way Industrial Estate

## Gloucester City Plan – Non Strategic Policies

Policy A1: Effective and efficient use of land and buildings
Policy A3: Estate regeneration
Policy A4: Student accommodation
Policy A5: Specialist housing

Policy A7: Self-build and custom-build homes
Policy A8: Static caravan sites
Policy A9: Extensions to existing dwellings
Policy A10: Annexes to existing dwellings
Policy B1: Employment and skills plans
Policy B4: Development within and adjacent to Gloucester Docks and Canal
Policy B5: Tourism and culture
Policy B6: Protection of public houses
Policy C1: Active design and accessibility
Policy C2: Allotments
Policy C3: Open spaces, playing fields and sports facilities
Policy C4: Hot food takeaways
Policy C5: Air quality
Policy C7: Fall prevention from taller buildings
Policy C8: Changing Places Toilets
Policy D1: Historic Environment
Policy D2: Non-designated heritage assets
Policy D3: Recording and advancing understanding of heritage assets
Policy D4: Shopfronts, shutters and signs
Policy D5: Views of the Cathedral and historic places of worship
Policy E1: Biodiversity and geodiversity
Policy E2: Nature Recovery Area
Policy E3: Green/blue infrastructure
Policy E4: Flooding, sustainable drainage and wastewater
Policy E5: Renewable energy potential of the River Severn and Canal
Policy E6: Development affecting Cotswold Beechwoods Special Area of Conservation
Policy E7: Trees, woodlands and hedgerows
Policy F1: Materials and finishes
Policy F2: Landscape and planting
Policy F3: Community safety
Policy F4: Gulls
Policy F5: Open-plan estates
Policy G1: Sustainable transport
Policy G2: Charging infrastructure for electric vehicles
Policy G3: Cycling
Policy G4: Walking
Policy G5: Broadband connectivity
Policy G6: Telecommunications infrastructure
Policy G7: Water efficiency



## 8 SUPERSEDED POLICIES

8.1 The following policies from the Adopted Gloucester City Local Plan (1983) are superseded by the Gloucester City Plan. **The list below shows the policies of the adopted Gloucester Local Plan 1983 (saved in 2007) which will be superseded on adoption of the Gloucester City Plan (in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulation 2021). With the exception of retail policies, all remaining policies of the 1983 Gloucester Local Plan have been superseded by the adopted Joint Core Strategy and Gloucester City Plan. These are as follows:**

E1	Release of industrial land sufficient for 5 years requirement
E2	Release of office development sufficient to cater for 5 years requirement
H1	Release of land for residential development to cater for 5 years requirement
H1c	Provision of additional housing sites to those identified in H1a will be encouraged in the city centre
H1e	Density and quality of housing development
H3	Preservation and revitalization of older housing stock
H4b	Provision of grants for adaptation of homes for the registered disabled
A1a	Heights of buildings and protection of views
A2	Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas
A2d	Demolition of listed buildings in conservation areas

A3g	Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street
A4e	Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances
A5a	The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged
A5c	Conservation and maintenance of structures and settings of City's historic fabric (various sites)
A5d	Redevelopment of Blackfriars as a tourist attraction
A6a	Provision of coach parking facilitate at Westgate Street and the Docks
A7	Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand
A7a	Provision of appropriate self-catering accommodation. Conference Centre and central area hotels

A7b	Encourage Guest House developments along main radial routes and the city centre
T1e	Pedestrian priority within traffic management schemes in the main shopping area of the city.
T1f	Pedestrian priority in the city centre outside the main shopping area
T2d	Measures to facilitate rear access servicing
T3	Introduction of traffic regulation and control measures along Bristol Road and Southgate Street
T3a	Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures
T3b	Consideration will be given to traffic management along Bristol Road
T4a	Differential charging of short and long stay car parks to discourage inappropriate use
T4k	Provision of car parking at private development in accordance with the Council's car parking standards
S1e	Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area
S2b	Major convenience shopping will not usually be permitted outside the main shopping area
S3	Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged
S3a	Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas
S3b	The City Council will seek to maintain the existing neighbourhood shopping provision in the City
L1	Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.
L1a	Retain existing areas of public open space
L1c	In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.

L1d	Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.
L2d	Seek to provide additional sports facilities on public open space in new developments.
L3c	Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester
L3d	Maintenance and protection of Robinswood Hill Country Park

<u>Local Plan policy</u>		<u>Superseded by Gloucester City Plan</u>	<u>Superseding Gloucester City Plan policy</u>
<u>E1</u>	<u>Release of industrial land sufficient for 5 years requirement</u>	<u>Yes</u>	<u>B3/SA</u>
<u>E2</u>	<u>Release of office development sufficient to cater for 5 years requirement</u>	<u>Yes</u>	<u>B3/SA</u>
<u>H1</u>	<u>Release of land for residential development to cater for 5 years requirement</u>	<u>Yes</u>	<u>SA</u>
<u>H1c</u>	<u>Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</u>	<u>Yes</u>	<u>A1</u>
<u>H1e</u>	<u>Density and quality of housing development</u>	<u>Yes</u>	<u>A1, F1, F6</u>
<u>H3</u>	<u>Preservation and revitalization of older housing stock</u>	<u>Yes</u>	<u>A3</u>
<u>H4b</u>	<u>Provision of grants for adaptation of homes for the registered disabled</u>	<u>No - but longer applicable</u>	<u>-</u>
<u>A1a</u>	<u>Heights of buildings and protection of views</u>	<u>Yes</u>	<u>D4</u>
<u>A2</u>	<u>Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas</u>	<u>Yes</u>	<u>D1, D3</u>
<u>A2d</u>	<u>Demolition of listed buildings in conservation areas</u>	<u>Yes</u>	<u>D1</u>
<u>A3g</u>	<u>Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street</u>	<u>No – but no longer applicable</u>	<u>-</u>
<u>A4e</u>	<u>Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances</u>		
<u>A5a</u>	<u>The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged</u>	<u>Yes</u>	<u>B5</u>

<u>A5c</u>	<u>Conservation and maintenance of structures and settings of City's historic fabric (various sites)</u>	<u>Yes</u>	<u>D1, D2</u>
<u>A5d</u>	<u>Redevelopment of Blackfriars as a tourist attraction</u>	<u>No – no longer relevant</u>	<u>-</u>

<u>A6a</u>	<u>Provision of coach parking facilitate at Westgate Street and the Docks</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>A7</u>	<u>Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand</u>	<u>Yes</u>	<u>B5</u>
<u>A7a</u>	<u>Provision of appropriate self-catering accommodation. Conference Centre and central area hotels</u>	<u>Yes</u>	<u>B5</u>
<u>A7b</u>	<u>Encourage Guest House developments along main radial routes and the city centre</u>	<u>Yes</u>	<u>B5</u>
<u>T1e</u>	<u>Pedestrian priority within traffic management schemes in the main shopping area of the city.</u>	<u>Yes</u>	<u>G1</u>
<u>T1f</u>	<u>Pedestrian priority in the city centre outside the main shopping area</u>	<u>Yes</u>	<u>G1</u>
<u>T2d</u>	<u>Measures to facilitate rear access servicing</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>T3</u>	<u>Introduction of traffic regulation and control measures along Bristol Road and Southgate Street</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>T3a</u>	<u>Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>T3b</u>	<u>Consideration will be given to traffic management along Bristol Road</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>T4a</u>	<u>Differential charging of short and long stay car parks to discourage inappropriate use</u>	<u>No – no longer relevant</u>	<u>-</u>
<u>T4k</u>	<u>Provision of car parking at private development in accordance with the Councils car parking standards</u>	<u>Yes</u>	<u>G1</u>
<u>S1e</u>	<u>Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area</u>	<u>No</u>	
<u>S2b</u>	<u>Major convenience shopping will not usually be permitted outside the main shopping area</u>	<u>No</u>	
<u>S3</u>	<u>Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged</u>	<u>No</u>	
<u>S3a</u>	<u>Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas</u>	<u>No</u>	
<u>S3b</u>	<u>The City Council will seek to maintain the existing neighbourhood shopping provision in the City</u>	<u>No</u>	
<u>L1</u>	<u>Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.</u>	<u>Yes</u>	<u>C3</u>

<b><u>L1a</u></b>	<b><u>Retain existing areas of public open space</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
<b><u>L1c</u></b>	<b><u>In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
<b><u>L1d</u></b>	<b><u>Where public open space already exists or there is a need for recreational facilities other than open</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>

	<b><u>space we will consider the provision of alternative leisure facilities at the cost of the developer.</u></b>		
<b><u>L2d</u></b>	<b><u>Seek to provide additional sports facilities on public open space in new developments.</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
<b><u>L3c</u></b>	<b><u>Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>L3d</u></b>	<b><u>Maintenance and protection of Robinswood Hill Country Park</u></b>	<b><u>Yes</u></b>	<b><u>C3</u></b>
<b><u>L5.b</u></b>	<b><u>Replacement provision of allotments</u></b>	<b><u>Yes</u></b>	<b><u>C2</u></b>
<b><u>L6</u></b>	<b><u>Maintenance of public footpath network</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>L6.a</u></b>	<b><u>Development of land crossed by a public right of way</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>L7.a</u></b>	<b><u>Presumption against development likely to affect the Robinswood Hill Quarry Site</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>L7.b</u></b>	<b><u>Nature conservation will be taken into account in proposals for development on a number of sites</u></b>	<b><u>Yes</u></b>	<b><u>E1, E2</u></b>
<b><u>C1.a</u></b>	<b><u>Site reserved at Abbeydale for location of an NHS clinic</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>C1.e</u></b>	<b><u>Site identified at Abbeydale to provide two Primary Schools</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>C1.f</u></b>	<b><u>Site identified at Abbeydale for County Council to provide a new library</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>
<b><u>C1.g</u></b>	<b><u>Site identified at Abbeydale for Gloucestershire Constabulary to provide police station</u></b>	<b><u>No – no longer applicable</u></b>	<b><u>-</u></b>



## 9 GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Local Planning Authority - The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the district council,

London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

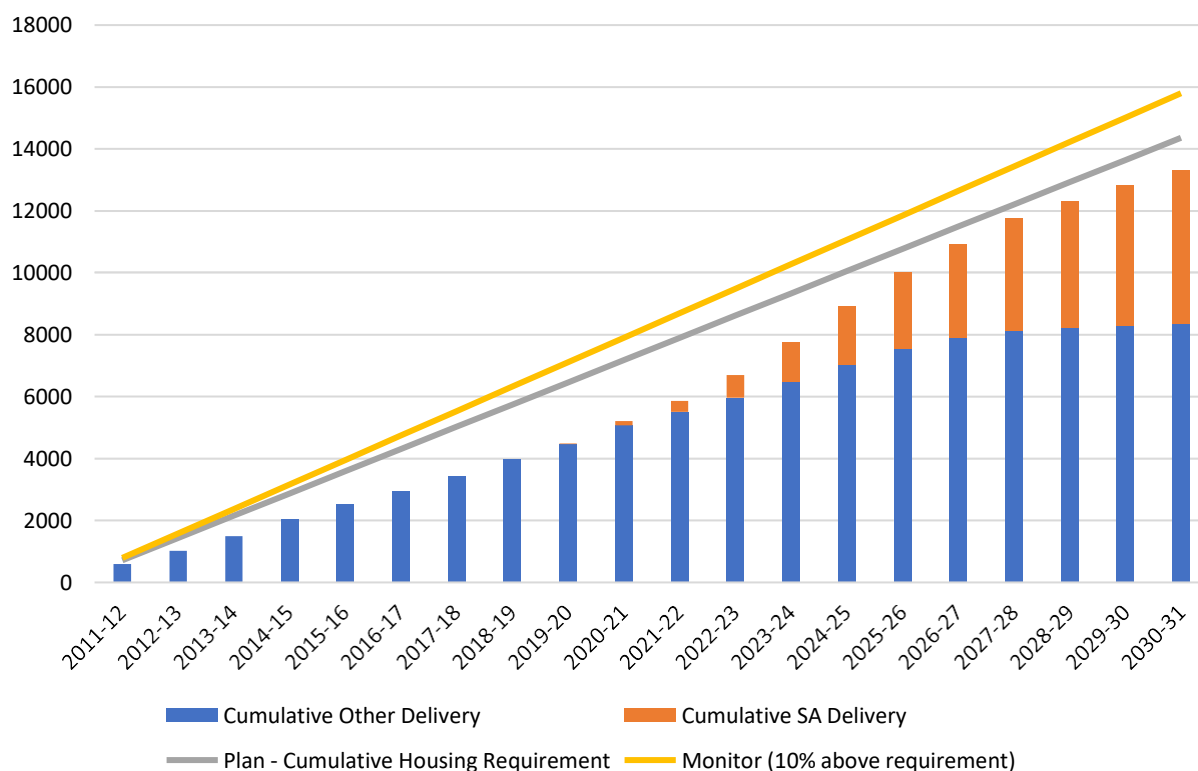
## Appendix 1 – Housing trajectory and five-year housing land supply calculation

### Housing (bricks and mortar)

The following tables and graph provide details of Gloucester City's housing trajectory and five-year supply calculation as of 31<sup>st</sup> March 2021. It updates that provided at paragraph 7.1.34 of the adopted Joint Core Strategy (pages 109 – 110).

<u>Year</u>	<u>Other Delivery</u>	<u>SA Delivery</u>	<u>Total Projected Completions</u>	<u>Cumulative Completions</u>	<u>Plan – Annual Housing Requirement</u> <u>t</u>	<u>Plan – Cumulative Housing Requirement</u> <u>t</u>	<u>Monitor – No of dwellings above or below Cumulative Requirement</u>
<u>2011-12</u>	<u>593</u>	<u>0</u>	<u>593</u>	<u>593</u>	<u>718</u>	<u>718</u>	<u>-125</u>
<u>2012-13</u>	<u>430</u>	<u>0</u>	<u>430</u>	<u>1023</u>	<u>718</u>	<u>1436</u>	<u>-413</u>
<u>2013-14</u>	<u>476</u>	<u>0</u>	<u>476</u>	<u>1499</u>	<u>718</u>	<u>2154</u>	<u>-655</u>
<u>2014-15</u>	<u>554</u>	<u>0</u>	<u>554</u>	<u>2053</u>	<u>718</u>	<u>2872</u>	<u>-819</u>
<u>2015-16</u>	<u>470</u>	<u>0</u>	<u>470</u>	<u>2523</u>	<u>718</u>	<u>3590</u>	<u>-1067</u>
<u>2016-17</u>	<u>439</u>	<u>0</u>	<u>439</u>	<u>2962</u>	<u>718</u>	<u>4308</u>	<u>-1346</u>
<u>2017-18</u>	<u>487</u>	<u>0</u>	<u>487</u>	<u>3449</u>	<u>718</u>	<u>5026</u>	<u>-1577</u>
<u>2018-19</u>	<u>544</u>	<u>0</u>	<u>544</u>	<u>3993</u>	<u>718</u>	<u>5744</u>	<u>-1751</u>
<u>2019-20</u>	<u>467</u>	<u>21</u>	<u>488</u>	<u>4481</u>	<u>718</u>	<u>6462</u>	<u>-1981</u>
<u>2020-21</u>	<u>610</u>	<u>114</u>	<u>724</u>	<u>5205</u>	<u>718</u>	<u>7180</u>	<u>-1975</u>
<u>2021-22</u>	<u>440</u>	<u>211</u>	<u>651</u>	<u>5856</u>	<u>718</u>	<u>7898</u>	<u>-2042</u>
<u>2022-23</u>	<u>454</u>	<u>388</u>	<u>842</u>	<u>6698</u>	<u>718</u>	<u>8616</u>	<u>-1918</u>
<u>2023-24</u>	<u>515</u>	<u>540</u>	<u>1055</u>	<u>7753</u>	<u>718</u>	<u>9334</u>	<u>-1581</u>
<u>2024-25</u>	<u>572</u>	<u>609</u>	<u>1181</u>	<u>8934</u>	<u>718</u>	<u>10052</u>	<u>-1118</u>
<u>2025-26</u>	<u>495</u>	<u>585</u>	<u>1080</u>	<u>10014</u>	<u>718</u>	<u>10770</u>	<u>-756</u>
<u>2026-27</u>	<u>334</u>	<u>564</u>	<u>898</u>	<u>10912</u>	<u>718</u>	<u>11488</u>	<u>-576</u>
<u>2027-28</u>	<u>241</u>	<u>595</u>	<u>836</u>	<u>11748</u>	<u>718</u>	<u>12206</u>	<u>-458</u>
<u>2028-29</u>	<u>114</u>	<u>450</u>	<u>564</u>	<u>12312</u>	<u>718</u>	<u>12924</u>	<u>-612</u>
<u>2029-30</u>	<u>64</u>	<u>450</u>	<u>514</u>	<u>12826</u>	<u>718</u>	<u>13642</u>	<u>-816</u>
<u>2030-31</u>	<u>64</u>	<u>424</u>	<u>488</u>	<u>13314</u>	<u>718</u>	<u>14360</u>	<u>-1046</u>

Gloucester City - Cumulative Housing Delivery against Requirement  
Update of JCS table at para 7.1.34



**Update of JCS 5 Year Housing Land Supply table at para 7.1.34**

	<u>Housing Delivery as of end March 2021</u>	<u>Explanation</u>	<u>5% Buffer</u>	
<b>A</b>	<u>GCC annual housing requirement</u>		<u>718</u>	<u>718</u>
<b>B</b>	<u>Number of years into the plan period to adoption</u>		<u>10</u>	<u>10</u>
<b>C</b>	<u>Requirement to plan adoption</u>		<u>7,180</u>	<u>7,180</u>
<b>D</b>	<u>Actual delivery 2011 - 2021</u>		<u>5,205</u>	<u>5,205</u>
<b>E</b>	<u>Total delivery to date</u>		<u>5,205</u>	<u>5,205</u>
<b>F</b>	<u>Shortfall to date</u>	$F = C - D$	<u>1,975</u>	<u>1,975</u>
			<u>Sedgefield</u>	<u>Liverpool</u>
<b>G</b>	<u>5 year requirement</u>	$G = A \times 5$	<u>3,590</u>	<u>3,590</u>
<b>H</b>	<u>Remainder of plan period (years)</u>		<u>10</u>	<u>10</u>
<b>I</b>	<u>Plan period shortfall to be met within the five year period</u>	$I =$ $\text{Sedgefield} = F$ $\text{Liverpool} = (F/H) \times 5$	<u>1,975</u>	<u>988</u>
<b>J</b>	<u>NPPF buffer</u>	$J = 5\% \text{ of } (G+I)$	<u>278</u>	<u>229</u>
<b>K</b>	<u>Total number of dwellings required</u>	$K = G + I + J$	<u>5,843</u>	<u>4,806</u>
<b>L</b>	<u>Total anticipated supply over 5 years</u>		<u>4,809</u>	<u>4,809</u>

<b>M</b>	<b>Percentage of total requirement met</b>	<b><math>M = (L/K) \times 100</math></b>	<b>82%</b>	<b>100%</b>
<b>N</b>	<b>Supply in years</b>	<b><math>M = (L/K) \times 5</math></b>	<b>4.1</b>	<b>5.0</b>

**Travelling Showpeople plots**

**For Travelling Showpeople plots for households that meet the definition, the five-year housing landsupply requirement as set out in the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017), are as follows.**

<b><u>Years</u></b>	<b><u>0 – 5</u></b> <b><u>2021 – 2026</u></b>	<b><u>6 – 10</u></b> <b><u>2026 – 2031</u></b>	<b><u>Total</u></b>
<b><u>Plots</u></b>	<b><u>7</u></b>	<b><u>1</u></b>	<b><u>8</u></b>

**At the time of writing, there are no deliverable sites within Gloucester to provide for this need. However, the City Council continues to explore opportunities within its administrative area engage proactively with neighbouring authorities to identify deliverable sites. Policies in the JCS support the delivery of windfall sites where in accordance with the development plan.**



## Appendix 2 – Relationship with the Adopted Development Plan

The following table sets out the relationship between policies in the Gloucester City Plan and the rest of the Development Plan. For ease of use, the relevant section is reproduced for each policy in the Gloucester City Plan.

<u>The following table sets out how each of the policies in the Gloucester City Plan relate to policies in the adopted Joint Core Strategy.</u>	
<u>Gloucester City Plan policy</u>	<u>Other Development Plan policy</u>
<b>A: HOUSING</b>	
<u>A1: Effective and efficient use of housing land and buildings</u>	<u>JCS SP2: Distribution of New Development</u> <u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u>
<u>A2: Houses in Multiple Occupation</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u>
<u>A3: Estate regeneration</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u> <u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u>
<u>A4: Student accommodation</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD14: Health and Environmental Quality</u>
<u>A5: Specialist housing</u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u> <u>JCS SD12: Affordable Housing</u>
<u>A6: Accessible and adaptable homes</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>
<u>A7: Self-build and custom build homes</u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>
<u>A8: Static caravan sites</u>	<u>JCS SD10: Residential Development</u> <u>JCS SD11: Housing Mix and Standards</u>

<u>A9: Extensions to existing dwellings</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u>
<u>A10: Annexes to existing dwellings</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD10: Residential Development</u>
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<u>B1: Employment and skills plans</u>	<u>JCS SD1: Employment – Except Retail Development</u>
<u>B2: Safeguarding employment sites and buildings</u>	<u>JCS SD1: Employment – Except Retail Development</u>
<u>B3: New employment development and intensification and improvements to existing employment land</u>	<u>JCS SD1: Employment – Except Retail Development</u>
<u>B4: Development within and adjacent to GloucesterDocks and Canal</u>	<u>JCS SD1: Employment – Except Retail Development</u> <u>JCS SD2: Retail and City / Town Centres</u> <u>JCS SD8: Historic Environment</u> <u>JCS SD14: Health and Environmental Quality</u>
<u>B5: Tourism and culture</u>	<u>JCS SD2: Retail and City / Town Centres</u> <u>JCS INF4: Social and Community Infrastructure</u>
<u>B6: Protection of public houses</u>	<u>JCS SD2: Retail and City / Town Centres</u> <u>JCS INF4: Social and Community Infrastructure</u>
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<u>C1: Active design and accessibility</u>	<u>JCS SD4: Design Requirements</u> <u>JCS INF1: Transport Network</u>
<u>C2: Allotments</u>	<u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u>
<u>C3: Public open space, playing fields and sportsfacilities</u>	<u>JCS INF3: Green Infrastructure</u> <u>JCS INF4: Social and Community Infrastructure</u> <u>JCS INF7: Development Contributions</u>
<u>C4: Hot food takeaways</u>	<u>JCS SD14: Health and Environmental Quality</u>
<u>C5: Air quality</u>	<u>JCS SD14: Health and Environmental Quality</u>
<u>C6: Cordon Sanitaire: Netheridge SewageTreatment Works</u>	<u>JCS SD14: Health and Environmental Quality</u> <u>Gloucestershire Waste Core Strategy 2012 – 2027: Core Policy WCS11 – Safeguarding Sites for Waste Management</u>
<u>C7: Fall prevention from taller buildings</u>	<u>JCS SD4: Design Requirements</u>
<u>C8: Changing Places Toilets</u>	<u>JCS SD4: Design Requirements</u>
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<u>E6: Development affecting Cotswold Beechwoods Special Area of Conservation</u>	<u>JCS SD9: Biodiversity and Geodiversity</u>
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<u>F4: Gulls</u>	<u>JCS SD14: Health and Environmental Quality</u>
<u>F5: Open plan estates</u>	<u>JCS SD4: Design Requirements</u> <u>JCS SD9: Biodiversity and Geodiversity</u>
<u>F6: Nationally Described Space Standards</u>	<u>JCS SD11: Housing Mix and Standards</u>
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<u>G4: Broadband connectivity</u>	<u>JCS INF6: Infrastructure Delivery</u>

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	<u>JCS SD10: Residential Development</u> <u>JCS SD13: Gypsies, Travellers and Travelling Showpeople</u> <u>Minerals Local Plan for Gloucestershire 2018 – 2032:</u> <u>CorePolicy MS01 – Non-Mineral Development within Mineral Safeguarding Areas</u>

# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>4 May 2022</b>	
<b>Subject:</b>	<b>Gloucestershire Statement of Common Ground</b>			
<b>Report Of:</b>	<b>Cllr Stephanie Chambers – Cabinet Member for Housing and Planning</b>			
<b>Wards Affected:</b>	<b>All</b>			
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>	
<b>Contact Officer:</b>	<b>Adam Gooch – Planning Policy Manager</b>			
	<b>Email:</b>	<b>adam.gooch@gloucester.gov.uk</b>	<b>Tel:</b>	<b>39-6836</b>
<b>Appendices:</b>	<b>1. Gloucestershire Statement of Common Ground</b>			

## 1.0 Purpose of Report

- 1.1 To seek approval from Cabinet for the Gloucestershire Statement of Common Ground.

## 2.0 Recommendations

- 2.1 Cabinet is asked to **RESOLVE** to:

- (1) **Approve the Gloucestershire Statement of Common Ground as set out at Appendix 1.**

## 3.0 Background and Key Issues

- 3.1 In preparing their local plans, local authorities are legally required to cooperate on strategic, cross-boundary planning matters. In two tier authorities such as Gloucestershire, this includes the County Council, as well as neighbouring authorities and prescribed bodies such as the Environment Agency, the Local Nature Partnership and highways authorities.
- 3.2 To demonstrate effective and ongoing joint working on such matters, local planning authorities are required to prepare and maintain one or more statements of common ground, which should document strategic, cross-boundary matters, and progress in cooperating on them. The statement should be produced using the approach set out in national planning policy and publicly available throughout the plan-making process to provide transparency.

### **Gloucestershire Statement of Common Ground**

- 3.3 In March 2019, Cabinet resolved to support the development of a Gloucestershire Statement of Common Ground (SoCG), to be prepared by the six local planning authorities, Gloucestershire County Council and the GFirst LEP. Following on, an initial draft was produced by a Strategic Planning Coordinator for the County, appointed by the Gloucestershire Economic Growth Joint Committee (GEGJC) in



May 2020. Since then, various revisions to the document have been subject to further discussions at Leaders Board. The final Gloucestershire SoCG is provided at Appendix 1.

- 3.4 The SoCG is a non-statutory document, subject to regular updates, which captures progress in working together and outcomes. The purpose of the statement is to:
- a) Identify and agree an action plan on the strategic planning matters in Gloucestershire that require collaborative working between the parties.
  - b) Identify and demonstrate where common ground exists between the parties.
  - c) Identify in principle the potential response to addressing the strategic spatial planning matters.
  - d) Provide the basis for a 'live' document to allow for regular updates which capture progress in responding to the strategic planning matters, acknowledging that responding to the climate emergency will be a 'golden thread' running through strategic planning activities and the outputs of the SoCG.
  - e) Meet in part the requirement for local planning authorities to discharge the statutory 'Duty to Cooperate' requirement as part of local plan preparation.
  - f) Respond to the GEGJC to develop a SoCG as the basis to consider the development of a Gloucestershire Spatial Development Strategy.
- 3.5 The SoCG includes a series of 34 high level agreements dealing with a broad range of environmental issues and land uses matters including addressing the climate and ecological emergencies, housing and economic needs, the Green Belt, transport provision, the natural environment and green infrastructure, health and social infrastructure, infrastructure delivery and minerals and waste.
- 3.6 Reaching agreement on how to address these strategic planning matters is the start of the SoCG process. Action needs to be taken to address the matters arising from these agreements. The SoCG proposes therefore that an Action Plan is developed to identify the actions to be taken, those responsible for taking that action, and a timeframe and budget to address the actions.
- 3.7 Once the SoCG has been approved by all signatory bodies the intention is that the Action Plan will be developed and reported to GEGJC. Progress on joint working will be reflected in future iterations of the SoCG which should be kept up to date. Any proposals for changes to current strategic planning arrangements or changes to the SoCG will be reported for decisions to Cabinet or to other meetings of this Council, as appropriate.

#### **4.0 Social Value Considerations**

4.1 None

#### **5.0 Environmental Implications**

5.1 The SoCG sets out various agreements between the signatories that have implications for the environment and will ensure continued and effective engagement on such matters as the various local plans are review and progressed across the county.

## **6.0 Alternative Options Considered**

- 6.1 The preparation of a SoCG is required by national planning policy. The geography and scope/scale of strategic planning matters mean that the preparation of this SoCG at the county level is most appropriate.

## **7.0 Reasons for Recommendations**

- 7.1 The SoCG sets out a set of agreements relating to the consideration of strategic planning matters between the district authorities, Gloucestershire County Council and the GFirst LEP.

## **8.0 Future Work and Conclusions**

- 8.1 Once the SoCG has been approved by all signatory bodies the approach to completing and updating the Action Plan will need to be agreed through GEGJC and Strategic Planning Leaders Board. Progress on joint working will be reflected in future iterations of the SoCG which should be kept up to date. Any proposals for changes to current strategic planning arrangements or changes to the SoCG will be reported for decisions to Cabinet or to other meetings of this Council, as appropriate. The Governance approach is set out at Section 7 of the Gloucestershire Statement of Common Ground at Appendix 1.

- 8.2 In discharging the continuing joint and individual local plan responsibilities, some of the participating local authorities will need to agree additional or supplementary SoCGs or Duty to Cooperate statements with neighbouring local authorities both within and outside Gloucestershire, and with other bodies. Where appropriate, additional or supplementary agreements may be incorporated into the Gloucestershire GSoCG in future iterations, with appropriate explanation, or be presented as separate documents.

## **9.0 Financial Implications**

- 9.1 Addressing strategic planning matters will be addressed by the planning teams and is factored into current resource requirements. Progressing the various commitments will often require the preparation of evidence, the budgets for which are factored into future budgets.

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

## **10.0 Legal Implications**

- 10.1 Section 33A(1) of the Planning and Compulsory Purchase Act 2004 which is in respect of the duty to co-operate in relation to the planning of sustainable development provides that each person who is a local planning authority, county council and certain other bodies (such as the Environment Agency and Homes and Communities Agency) must co-operate with each other and local enterprise partnerships in maximising the effectiveness with which certain activities are undertaken. These activities are the preparation of local development plans (including development plan documents) and any activities that can reasonably be considered to prepare the way for/support for such activities so far as relating to a strategic matter.

- 10.2 A strategic matter for the duty is sustainable development or use of land that has or would have a significant impact on at least two planning areas and sustainable development or use of land in a two-tier area if the development or use is a county matter or has or would have a significant impact on a county matter.
- 10.3 Under sections 19(1B) to (1C) of the 2004 Act, each local planning authority must identify strategic priorities for development and use of land in the authority's area and policies to address those priorities must be set out in the local authority's development plan documents (taken as a whole).
- 10.4 Paragraph 20 of the National Planning Policy Framework (2021) sets out the matters that strategic policies should provide for and under paragraph 27 it is stated that in order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency.
- 10.5 When soundness of plans are tested under the NPPF (2021) one element of this under paragraph 35 is that the plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. Therefore, although not a statutory document, statements of common ground dealing with these matters will be expected when plans are at examination. The formal approval of the Statement of Common Ground will remain the responsibility of each of the parties to it.

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

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

- 11.1 The SoCG provides a number of agreements that form the basis for engaging with neighbouring authorities and prescribed bodies on strategic planning matters. There is a risk that that a lack of resources prevent the agreements being implemented effectively, but as mentioned at section 8.0, the necessary financial and other resource requirements are identified.

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

- 12.1 A PIA is not required because the Gloucestershire Statement of Common Ground does not establish specific policies or procedures but only broad areas for seeking future agreement. However, statutory local plans and other planning policy documents prepared in the future to address strategic planning matters will be assessed for any equality implications.

## **13.0 Community Safety Implications**

- 13.1 None.

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

14.1 None

### **Background Documents:**

None

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Gloucestershire  
Economic Growth  
Joint Committee

Gloucestershire  
Statement of Common Ground – February 2022

Cheltenham Borough Council  
Forest of Dean District Council  
Gloucester City Council  
Stroud District Council

Cotswold District Council  
GFirst LEP  
Gloucestershire County Council  
Tewkesbury Borough Council

**Version Control**

<b>Version</b>	<b>Date</b>
Version 1	John Baker 31/05/2020
Version 2	DO Comments on J Baker 08/06/2020
Version 3	DO Version September 2020
Version 4	DO Version December 2020
Version 5	JR Version February 2021
Version 6	JR Version May 2021
Version 7	JR Version July 2021
Version 8	SF Version January 2022
Version 9	JR Version February 2022

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## 1. Introduction

- 1.1. This Gloucestershire Statement of Common Ground (GSoCG) has been prepared by the 7 local authorities in Gloucestershire (x1 County Council and x6 'District' Councils) and GFirst LEP – Gloucestershire's Local Enterprise Partnership – hereafter referred to as the parties.
- 1.2. "Gloucestershire has been a significant location for commerce since around AD48 when the Romans established an important crossing at the River Severn at Glevum. Located at a crossroads between Wales and London, and the West Midlands and the South West, the county's strategic position, even in an increasingly digital age, remains important to this day for businesses, visitors, and residents alike<sup>1</sup>". The county has a diverse and highly valued natural and built environment that makes it a particularly attractive place to live and work.
- 1.3. The County has a strong track record of working together at the strategic level, and has reached agreement on numerous subjects of common interest in recent times including Gloucestershire 2050, the Gloucestershire Local Housing Needs Assessment and the Gloucestershire Inward Investment programme. This GSoCG provides the opportunity to build upon the work that has gone before.
- 1.4. This is the first GSoCG and as such does not contain all the answers. The purpose of this statement is:
  - a. To identify and demonstrate where common ground exists between the parties
  - b. To identify and agree an action plan on the strategic spatial planning matters in Gloucestershire that require collaborative working between the parties.
  - c. To identify in principle the potential response to addressing the strategic spatial planning matters.
  - d. To provide the basis for a 'live' document to allow for regular updates which capture progress against responding to the strategic spatial planning matters, acknowledging that responding to the Climate emergency will be the "Golden thread" that runs through the strategic planning activities and the outputs of this GSoCG.
  - e. To meet (in part) the requirements placed on Local Planning Authorities from the National Planning Policy Framework Revised 2019 (the Framework) to discharge the statutory 'Duty-to-Cooperate' as part of their local plan preparation. The various statutory requirements for a statement of common ground are set out in Appendix 1 for ease of reference.

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<sup>1</sup> Source – Draft Gloucestershire Industrial Strategy 2019

- f. To respond to the Gloucestershire Economic Growth Joint Committee (GEGJC) to develop a statement of common ground as the basis to consider the development of a Gloucestershire Spatial Development Strategy.

1.5. Appendix 2 provides context and explanation to support the agreements outlined in this document.

## **2. Parties involved**

2.1. This GSoCG agrees strategic spatial planning matters between the following parties:

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- GFirst LEP
- Gloucester City Council
- Gloucestershire County Council
- Stroud District Council
- Tewkesbury Borough Council.

2.2. Any part of the GSoCG that is not agreed by the parties will be identified in Appendix 3, along with the organisation(s) not in agreement. Where text is not agreed by all parties it will be denoted with a dashed border.

2.3. In discharging their continuing joint and individual local plan responsibilities, some of the participating local authorities will need to agree additional or supplementary SoCGs or Duty-to-Cooperate statements with neighbouring local authorities both within and outside Gloucestershire, and with other bodies. Where appropriate, additional or supplementary agreements may be incorporated into the Gloucestershire GSoCG in future iterations, with appropriate explanation, or be presented as separate documents.

2.4. The GSoCG is a strategic document. It deals with matters that require cross-boundary consideration and agreement, and does not address non-strategic issues, which are the concern of and can be addressed by individual organisations, including through their local plans and the local transport plan.

## **3. Signatories**

3.1. The signatories to the GSoCG are the Leaders or Portfolio Holders of the seven local authorities, or the Chief Officers under delegated powers, and the Chair or Chief Executive of GFirst LEP as follows:

Signature and date

Leader or Chief Executive

Cheltenham Borough Council

Signature and date

Leader or Chief Executive

Cotswold District Council

Signature and date

Leader or Chief Executive

Forest of Dean District Council

Signature and date

Chair or Chief Executive

GFirst LEP

Signature and date

Chair or Chief Executive

Gloucester City Council

Signature and date

Leader or Chief Executive



Gloucestershire County Council

Signature and date

Leader or Chief Executive

Stroud District Council

Signature and date

Leader or Chief Executive

Tewkesbury Borough Council.

Other signatories

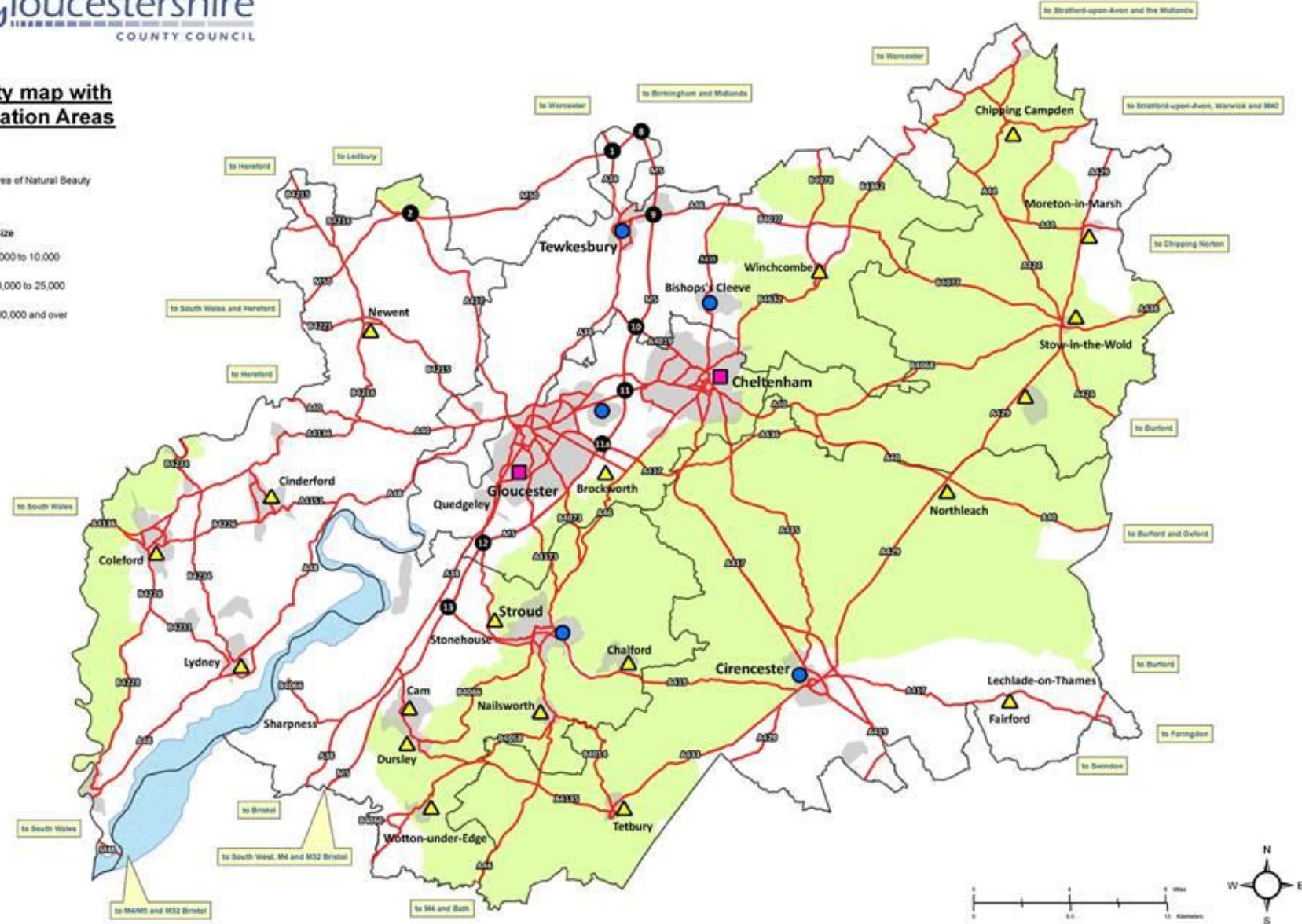
- 3.2. An appropriate representative of other strategic organisations will be required as a signatory if their organisation becomes a party to the GSoCG.

#### **4. Gloucestershire's Strategic Geography**

- 4.1. The GSoCG applies to the County of Gloucestershire. The rationale for developing a GSoCG for this area is the distinctiveness of the area and the relationship between the urban core of Gloucester and Cheltenham and the largely rural areas of Cotswold, Forest of Dean, Stroud and Tewkesbury and the functional and connectivity relationships that are presented. Gloucestershire as a whole is a Functional Housing and Economic Area with a sound economy, though with greater economic potential. This is recognised by the presence of GFirst LEP covering the same area. It also has a Police and Crime Commissioner and a Clinical Commissioning Group, alongside other strategic groups such as the Gloucestershire Nature Partnership and the Gloucestershire Health and Wellbeing Board.

**County map with Population Areas**

-  Area of Natural Beauty
- Population Size**  
 1,000 to 10,000  
 10,000 to 25,000  
 100,000 and over



## 5. A Gloucestershire Spatial Development Strategy

### 5.1. The GEGJC have committed to:

“deliver a high-level spatial planning document for Gloucestershire which will set out agreed broad allocations for housing and economic growth across all districts”

and

“the development of, a high level future growth document for Gloucestershire, and work with the Local Plan teams to translate this into an agreed and adopted Gloucestershire Spatial Development Strategy”

5.2. In November 2018, the GEGJC endorsed a proposal to develop a “statement of common ground” as the most effective way of advancing these commitments in the first instance.

5.3. In addressing the matters agreed in this draft GSoCG, action will be taken and a body of evidence will be collected. Drawing that information together and understanding the relationship between the evidence gathered could readily then lead to the production of a Gloucestershire Spatial Development Strategy. The time, resource and financial requirements to support a Spatial Strategy need to be understood before commitment is given. When the aforementioned ‘Action Plan’ is presented to GEGJC, it will be accompanied by a business case for a Spatial Strategy for the County for consideration.

### Agreements

1. The parties agree to the development of a Gloucestershire Spatial Development Strategy and it is recognised that agreeing this statement of common ground provides the most effective way of advancing this commitment in the first instance.
2. The parties agree that an action plan to address the matters and agreements within the GSoCG should be produced. That action plan should build upon the emerging early work undertaken by Gloucestershire County Council and set out the matters to be addressed, the course of action proposed, responsibilities, timetables and budget requirements. That action plan will be presented for consideration by the parties in due course. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence.

## 6. Strategic Planning Matter Agreements

6.1. The following presents the agreements reached between the parties on strategic planning matters in Gloucestershire which require a joint response.

### Climate Change

## Agreements

3. The parties agree that the climate and ecological emergencies presents risks to the county that are systemic, and unprecedented in scale and potential impact.
4. The parties agree that responses to the climate and ecological emergencies must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.
5. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate and ecological emergencies and wherever possible deliver a positive contribution to climate change mitigation and adaptation and ecological recovery. Responding to the Climate Emergency will be the 'golden thread' that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.
6. The parties agree to investigate the use of alternative forms of energy generation, in line with environmental and landscape considerations.

## Housing

### Agreements

7. The Parties agree that making provision to meet the full range of housing needs in the right places at the right time is a vital role for the Gloucestershire authorities. The parties acknowledge this may result in one local authority accommodating the identified needs of another local authority, particularly where a local authority is unable to accommodate all of the identified need and where accommodating need in a neighbouring authority represents the most sustainable form of development.
8. The parties agree to jointly seek to meet in full (at least) the aggregated housing needs for Gloucestershire as identified by the statutory standard method at the time. The parties will continue the joint approach to the collection of housing needs data through a jointly procured and managed Local Housing Needs Assessment, using the relevant housing need methodology of the day. The parties agree to deliver housing where it promotes sustainable patterns of growth in Gloucestershire and is designed to respect local character and address potential impacts on existing communities.
9. The parties agree to explore the full range of development opportunities available, taking into account the potential impact on existing communities, resources and infrastructure.

## The Economy and Employment

### Agreements

10. The Parties agree it is important to take advantage of the location and characteristics of Gloucestershire and its economic strengths. The parties will take a pro-active role in creating the conditions within which existing and potential new employers can flourish, with a particular emphasis on spatial planning. Action will be taken to identify the appropriate scale and distribution of employment allocations, with the potential value of strategic sites to serve a larger area fully considered.
11. Parties agree that collaboration is essential to deliver a purposeful Gloucestershire approach to inward investment and business retention.

## **The Green Belt**

### **Agreements**

12. The Parties agree that the Green Belt in Gloucestershire is a strategic issue to be considered in the context of strategic spatial planning for the County.
13. The Parties agree that changes to the Green Belt boundary will be considered through the local plan making process, particularly through the JCS Review, in order to provide more sustainable locations for development that support the overall spatial strategy.

## **Transport Provision**

### **Agreements**

14. The Parties agree that strategic land allocations will set out the appropriate transport infrastructure required to deliver sustainable, resilient communities. This will be achieved through implementing the policies of the Gloucestershire Local Transport Plan, which provides for better public transport, cycle and pedestrian infrastructure, and active travel to enable a more efficient, low-carbon and people-centred transport network that delivers genuine travel choice and contributes to the growth of Gloucestershire's economy. Each strategic allocation that comes forward through the development plan will be supported by a sustainable transport mitigation package, based on the policies set out in the Gloucestershire Local Transport Plan.
15. The Parties agree to continue the exploration and pursuit of the opportunities to enhance the passenger transport network and services, as an integral part of developing a potential integrated spatial strategy and with the objective of increasing the proportion of trips within and beyond Gloucestershire made by rail.
16. The Parties agree that local plans should contain policies to ensure new developments support, where possible, the viability of passenger transport network and services. This is in recognition of the role of passenger transport in improving all people's accessibility and to reducing the carbon emissions associated with transport.
17. All parties agree that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.



18. The Parties agree that local plans should contain policies requiring developments to contribute the provision of the walking and cycling network. This is in recognition of the role active travel will play in achieving carbon reducing ambitions and promoting a healthy and active society. The aspiration is for cycling to become mass transit and routes must be designed for larger numbers of cyclists, of all abilities and disabilities. Cycling and walking should be at the heart of transport, place-making, and health policy.

## Digital Network

### Agreements

19. The Parties will seek every opportunity to promote the advancement and rollout of digital infrastructure. The goal will be to achieve high quality digital services and modern economic and social infrastructure for Gloucestershire so that the County can continue to compete regionally, nationally and globally in the attraction of people and businesses. There will be a particular focus on delivering cyber technologies and digital infrastructure across the entire County, noting that substantial parts of Gloucestershire are rural areas.
20. The Parties will work with industry to identify the best means of contributing through planning policy and highways work to the timely delivery of comprehensive, open access, digital infrastructure.

## Natural Environment and Green Infrastructure

### Agreements

21. The Parties will ensure that strategically and locally important green infrastructure and ecosystem services are valued and improved through the development of a Natural Capital approach and the Nature Recovery Network, both being led by the Gloucestershire Local Nature Partnership (GLNP).
22. The Parties agree that local plans should contain policies requiring developments to deliver high quality and appropriately managed green infrastructure, to comply with and, where feasible, be assessed against the Building with Nature Standards, and to deliver a net gain for biodiversity.
23. In developing the Natural Capital approach, consideration will continue to be given to the desirability and feasibility of creating a regional park, possibly around the River Severn and its washlands, with objectives including raising awareness of the natural environment, habitat enhancement, recreation, strategic water management, carbon capture, and the creation of a Gloucestershire brand.
24. The Parties agree to work collaboratively to help conserve, manage and enhance the area's unique natural environment including areas of international and national landscape and biodiversity importance.

25. The Parties agree to work collaboratively and holistically to develop a Gloucestershire wide approach to mitigate against flood risk and to build in resilience through nature-based solutions. The role played by green infrastructure in reducing the risk of flooding should be considered at every scale stage in determining sustainable strategic land allocations for housing and employment. Parties agree to ensure adequate consideration is given to the cumulative and off-site impacts of development on future flood risk. The promotion of new water retention technologies will be encouraged, including sponge technology techniques.

## Health and Social Infrastructure

### Agreements

26. Parties will ensure that provision for strategic health, wellbeing, cultural and education facilities, consistent with the changing size and structure of the population, is made in the appropriate locations through spatial strategy. This will include the raising of standards and inclusive access across these facilities.
27. The Parties are committed to the elimination of discrimination and promotion of equality of opportunity for all citizens and will work towards this goal, both in the provision of services and employment.

## Infrastructure Delivery

### Agreements

28. The Parties agree that the strategic infrastructure needs\* for the County, particularly those that align to future strategic growth, will be identified, prioritised and agreed on, and captured in one single source document. A methodology for prioritisation will be agreed in advance of the prioritisation taking place.
29. The infrastructure agreed upon will be costed and scheduled. The likely funding streams and mechanisms to enable the delivery of infrastructure will be identified. Joint working and engagement across parties will be used to develop business cases for funding and competitive bidding.
30. The Parties agree, through appropriate governance arrangements, that the task identified at agreements 22 and 23 should be undertaken strategically with involvement of the parties and others where relevant.

*\* Strategic Infrastructure Needs - refers to a broad range of infrastructure required to support future growth, included but not limited to social, cultural, educational, green infrastructure as well as more 'traditional' infrastructure associated with new development (e.g. roading infrastructure).*

## Minerals and Waste

## Agreements

31. The Parties agree to identify valuable minerals resources to be safeguarded for possible exploitation, and agree to seek the best way forward and its implementation through local plans, including by the exploitation of minerals in association with development in accordance with the spatial strategy.

32. The Parties will support the form and location of appropriate waste management facilities to positively support a progressive approach to waste management and press on with the move towards a circular economy. The Parties will actively discourage waste management facilities that do not contribute to the development of the circular economy.

33. The Parties will continue and extend the work started in parts of the Gloucestershire the identification of opportunities for the generation of energy from renewable and benign resources and will seek positive and progressive policies in local plans for the exploitation of these opportunities.

34. The Parties will seek to produce a reduction in the level of energy use, and this will be sought in part by the requirement for the incorporation of the most appropriate advanced technologies for energy generation from renewable sources and for energy conservation as part of significant new development schemes.

## 7. Governance

7.1. In order for this GSoCG to be advanced and the agreements identified above delivered, clear governance is required. The GEGJC is an established committee, and is the committee that jointly commissioned this GSoCG. The following governance arrangements are proposed:

- The GEGJC will continue to be the committee responsible for the overall production, development and monitoring of the GSoCG.
- The Senior Responsible Officer for the GSoCG will be XXX. They are charged with XXX
- The Strategic Planning Leaders Board will continue to provide strategic oversight and management of the GSoCG, the GSoCG Action Plan and any other future initiatives arising from the GSoCG.
- The Heads of Planning/Planning Policy Managers in district authorities, the Outcome Manager from GCC and the Deputy CEO from GFirst LEP will take responsibility for the production and updating of any further initiatives arising from the GSoCG

## Agreements

35. The parties agree that the Gloucestershire Economic Growth Joint Committee will be the committee responsible for the production and monitoring of the GSoCG.

36. The parties agree that whilst the essential purpose of the GSoCG is to promote joint action in addressing strategic issues, nothing in the GSoCG removes the roles and responsibilities of the individual participating organisations in making decisions according to their statutory roles.

## **8. Next Steps**

- 8.1. Reaching agreement on strategic planning matters is the start of the GSoCG. Action needs to be taken to address the matters arising from those agreements. It is proposed that an action plan be developed to identify the actions to be taken, those responsible for taking that action, and a timeframe and budget to address the actions. This will be presented to GEGJC within 6 months of this GSoCG being approved by GEGJC. (See Appendix 4 for template)
- 8.2. The actions will address some of the evidence needs arising from Local Plan preparation across the 7 authorities. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence..
- 8.3. The GSoCG is a live document and needs to be kept up-to-date. This should be done annually and/or when progress is made to address the matters or agreement and/or when the landscape changes (for example planning reform or local government reorganisation). Progress also needs to be monitored, which again should be done annually and reported through a monitoring report.

## **Agreements**

37. The parties agree that the GSoCG is a live document, to be updated and monitored regularly, and as a minimum on an annual basis.

## **Appendices**

1. The Requirements of a Statement of Common Ground
2. Background Information to Support the Gloucestershire Statement of Common Ground
3. List of 'Agreements' not agreed by any and/or all parties
4. Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground



## **Appendix 1 - The Requirements of a Statement of Common Ground**

MHCLG – Guidance on Plan Making (<https://www.gov.uk/guidance/plan-making>)

### **What is a statement of common ground expected to contain?**

A Statement of Common Ground is expected to contain the following:

- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
- b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;
- c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
- d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
- e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
- f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.

## Appendix 2 - Background Information to Support the Gloucestershire Statement of Common Ground

### 1. Gloucestershire's Strategic Geography

- 1.1. Gloucestershire lies between other complementary and competing areas, with Bristol and the West of England Combined Area to the south, Oxfordshire to the east; Swindon to the South East; Birmingham, Coventry and Warwickshire to the north; and Worcestershire and Wales to the west and north-west. Gloucestershire is part of the Western Gateway launched in November 2019, as a strategic partnership intended to promote and maximise economic growth across the west of England and south Wales. The Western Gateway will seek to ensure that the region is globally competitive and as such is intended to mirror and compete with the already established Northern Powerhouse and Midlands Engine. Gloucestershire is actively involved in the progression of the Western Gateway and Gloucestershire has a significant role to play, in particular through the progression of cyber as a key sector and lever for growth in this part of the region. As well as cyber-tech the draft Local Industrial Strategy highlights agri-tech, aerospace and manufacturing services sectors as key strengths for the county.
- 1.2. There are a number of strategies dealing with social, economic and environmental issues for Gloucestershire and others in preparation. These are examples of collective working on strategic issues, and participants in the GSoCG are either party to these strategies or will continue to seek to work with the owners of these strategies and to cooperate in their implementation. Current and emerging strategies include Gloucestershire 2050, the Local Industrial Strategy, the Local Transport Plan, the Sustainable Energy Strategy, the Green Infrastructure Strategy and the emerging climate change strategy for Gloucestershire. What is clearly evident from this strategic context is the alignment of priorities that that will need to be considered in developing the GSoCG.
- 1.3. Currently, Local Plans and the Local Transport Plan are the primary, statutory mechanism used to plan and deliver development in Gloucestershire. These plans, when considered holistically, provide a 'spatial plan' for Gloucestershire up to the mid 2030's, broadly as follows:
  - The Urban Areas of Cheltenham and Gloucester, adjacent areas within Tewkesbury Borough, as well as Ashchurch are the focus of strategic growth
  - Stroud caters for significant growth, commensurate with its size and geographical location
  - Tewkesbury and Winchcombe together with the larger villages of Tewkesbury Borough, the Forest of Dean towns of Coleford, Lydney, Newent and Cinderford, and the larger Cotswold towns of Cirencester, Moreton-in-Marsh and Tetbury cater for reasonable levels of development, commensurate with their size.
  - Smaller urban areas (including villages) across Gloucestershire provide for local need
  - Rural areas are largely protected from development
  - Investment in transport infrastructure largely aims to cater for growth at the levels identified above and remedy other existing, identified problems.

Spatial planning in Gloucestershire has been approached in this hierarchical way for some considerable time. With the important additional consideration of potential new settlements, such a development approach means that homes are built close to the largest areas of employment opportunities, infrastructure investment can be target toward major populations (enhancing its use, effectiveness and success) whilst other areas can accommodate local demand whilst protecting character, both built and natural. The current status of Local Plans across Gloucestershire is set out at Appendix 2.

## **2. Current Context (September 2020)**

2.1. There are a number of recent events that will inevitably impact on spatial planning in Gloucestershire (and indeed the broader country). They are outlined below because they will have a significant bearing on the way in which this GSoCG and any Gloucestershire wide spatial planning is taken forward. These include:

- All local authority parties have declared a Climate Change emergency (with some also declaring a specific ecological emergency) with varying aims and targets within the last 12-18 months, all with a theme of reducing carbon emissions. If this is to be achieved the location and connectedness of, and the design standards adopted in new development need careful consideration and a joined up approach.
- Covid 19 and it's impacts – It is inevitable that there will be negative short-medium term economic consequences. There may well be lasting societal changes that emerge too – including a reduced demand for travel, a greater appreciation and utilisation of people's homes and local areas (in particular open, green spaces), an accelerated need to change the function of urban centres, a need for enhanced digital connectivity and so on, a decentralisation from larger urban centres such as London and Birmingham as remote technology and ability to work from homes shifts perceptions in where people wish their homes to be located.
- The Government's Planning White Paper of Summer 2020 proposes wholesale reform of the planning system in England. There are a wide range of changes proposed which if implemented will have a significant impact on Plan making and infrastructure delivery across England.
- The Government may consult on further devolution proposals during 2021. The opportunity to plan jointly (for example the JCS) already exists, but changes to local government structures in the future may provide new opportunities.

2.2. Taken as a whole, these recent events, the outcomes of which are unknown, will have a profound effect on plan making and delivery of growth in the future. This must be borne in mind in progressing with this GSoCG and any recommendations arising. A live 'GSoCG' should enable timely responses to the challenges we face. At the same time, investment in strategic planning, including future work on this GSoCG and any subsequent planning strategy work, needs to be carefully considered in the context of planning reform and local government review.

### **3. Strategic Planning Matters in Gloucestershire**

#### **Introduction**

- 3.1. The GSoCG is about strategic planning matters that can be addressed by spatial planning and need to be addressed by more than one district planning authority, whilst working with the County Council and GFirst LEP. What follows is an identification of the strategic matters in Gloucestershire, with a set of agreements which capture the matters arising and the proposed responses (as actions). They are presented as distinct matters of spatial planning but need to be considered as component parts of successful spatial planning.

#### **Climate Change (and Ecological Emergency)**

- 3.2. There is an overwhelming need in Gloucestershire, as everywhere, to address the climate and ecological emergency, as declared by each of the local authorities in Gloucestershire. The strategic planning activities in the Gloucestershire must work towards this commitment and to achieving a net carbon zero society. There are opportunities through growth to advance carbon reduction technologies in Gloucestershire, including through commitments to sustainable construction and better building energy performance. The level of use of energy by residents, workers and visitors is higher in Gloucestershire, as everywhere, than is consistent with a low carbon future. More needs to be done to generate energy locally from renewable sources using a variety of technologies and to reduce the consumption of energy generally.
- 3.3. Gloucestershire's existing transport network depends largely on its highway network. Future transportation solutions in Gloucestershire need to balance demand for clean sustainable growth and improved connectivity with maximising the efficiency of existing infrastructure. Significant investment in Gloucestershire's passenger and active travel networks will be required to complement planned highway capacity works as future growth will require greater integration of modes to ensure a high quality transport network is deliverable.
- 3.4. The legacy of COVID-19 and the possible changes towards travel demand is likely to challenge the traditional view of managing the transport network, with the priority of minimising journey times switching to managing journey options for people as transport networks decarbonise. Serving a growing leisure market may also become as important as commuting options when people decide where to live and this may need to be considered as the county grows.

#### **Housing**

- 3.5. The housing needs of Gloucestershire have to be met to enable the members of the changing population to house themselves, including those who need assistance through the provision of affordable housing, to address the need to attract a younger working age population and to ensure a workforce exists locally to enable the achievable growth in the economy to take place. The housing that is built needs to be fit for purpose and enable people to live

independently in their own home for as long as they can. This will require a flexible response to the type and tenure of housing together with the sustainability principles of the product.

- 3.6. Each local authority is required to make provision to meet the housing needs of its area through Local Plans. How and where that provision is made clearly affects those in need of housing, and has implications for the economy, transport and the environment. It is important that the right type of housing is development in the right places to meet needs, enhance wellbeing, support the economy and protect the environment. The future form of housing development in Gloucestershire, whether this be through extensions to existing settlements or through new settlements, should promote sustainable patterns of living and be designed to respect local character.
- 3.7. The housing requirements are increasingly unlikely to be met wholly within the same local administrative area as the need arises, particularly where those areas are geographically/administratively constrained (e.g. Cheltenham and Gloucester). Where this arises, planning policy requires those authorities to seek provision in neighbouring authority areas, and if this cannot be achieved reach a conclusion that the need cannot be met. Failing to meet housing need impacts on Gloucestershire’s growth ambitions, housing affordability and choice, reduces the available workforce in an area and encourages travel between people’s homes and jobs particularly (in Gloucestershire case) by private car and can make the provision of services less efficient to deliver.
- 3.8. Current local plans/local plans in development in Gloucestershire make provision for new homes to varying timescales. This provisions is captured below:

Area	Plan Status and key dates	Plan Period	Requirement	How is this Met?
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	at least 10,917 new homes	Completions, commitments, Plan allocations and windfall allowance
<b>Cotswold</b>	Adopted 2018	2011-2031	420 pa	Allocation and windfall supply
<b>Forest of Dean</b>	Allocations Plan adopted June 2018 Replacement Local Plan at early strategic options stage (2021-41)	2006-2026	330 pa	Allocation and windfall
<b>Gloucester</b>	Adopted Joint Core Strategy	2011-2031	at least 14,359 new homes	Completions, commitments,



	Emerging Gloucester City Plan (at Examination)			Plan allocations and windfall allowance
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	At least 11,400 new homes	Completions, commitments, Plan allocations and windfall allowance
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	9,900	Completions, commitments and proposed allocations in emerging Borough Plan total 9,397 dwellings  Shortfall (503 dwellings) to be addressed through JCS review

3.9. Local Plans in the area also contain specific policies for Gypsy and Traveller provision, as below:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Requirement</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	3 pitches	Criteria based policy
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	3 pitches	2 allocated sites + criteria based policy for additional allocations
<b>Forest of Dean</b>	Allocations Plan 2018/ Core Strategy 2012	2006-2026	No requirement identified at time of examination	Criteria based policy

<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	2 pitches	
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	31 pitches	Completions and commitments
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	17 pitches <sup>2</sup>	Completions and proposed Borough Plan allocations total: 50 pitches

3.10. Local Plans in the area also contain specific policies for Travelling Showpeople provision, as below:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Need</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	None	N/A
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	None	Criteria based policy
<b>Forest of Dean</b>	Allocations Plan 2018/ Core Strategy 2012	2006-2026		Criteria based policy
<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	16 plots	

<sup>2</sup> 17 pitches includes 5 pitches from those who meet the definition of traveler from the Planning Policy for Traveller Sites plus 25% (12 pitches) of those where it was at the time unknown whether they would meet the definition or not.

<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	8 plots	Completions and commitments
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	22 plots	Proposed Borough Plan allocations total: 9 plots

3.11. There are good reasons for the parties to agree that housing provision is a strategic spatial planning issue, and that joint working to make sufficient provision is essential. Work is already underway to address this issue jointly. District authorities in Gloucestershire are currently working on a Local Housing Needs Assessment which identifies the minimum housing need for Gloucestershire broken down to a District level and sub categories of need, including affordable housing and housing for special needs.

3.12. Proposed reforms to the current planning system will change the methodology used to calculate housing need. The initial indication is that the 20yr need will rise from 65,000 under the current method to 95,000 under the new method. To meet these identified needs a range of development options will need to be considered and joint working will be essential.

### **The Economy and Employment**

3.13. Whilst the economy of Gloucestershire is strong, there is greater economic potential to be achieved, with some sectors showing particular strength and with Gloucestershire home to some distinctive businesses activities that can be nurtured to the benefit of the local and wider economy. All prospective employers will in part be assisted through the provision of employment land and space where it is needed and of a scale and type suitable for the requirements of the relevant sectors, with particular regard to where Gloucestershire may have a particular advantage over other possibly competing areas. Flexibility will be key and this will need to be built through engagement across the key sectors. GFirst LEP will be a key contributor to providing the evidence base to help steer the changing economic context for Gloucestershire.

3.14. Gloucestershire has an ageing population with a falling level of economically active people, a change taking place because the retention of young people in the area is relatively low. This will give rise to increasing inter-generational tensions and has direct and indirect negative effects on the economy.

3.15. In Gloucestershire critical roles in creating the conditions for businesses to thrive include:

- The district councils, charged with providing for employment space through the allocation of land in local plans, and with ensuring enough housing is provided

- The County Council responsible for transport infrastructure, economic development and education
- GFirst LEP with very strong links with businesses and providing direct support to new, incoming and existing businesses, as well as producing the Local Industrial Strategy
- All local authorities with various responsibilities for green and inclusive growth

3.16. Whilst these organisations work together, there isn't yet one coherent strategy for coordinated action to support the development of employment and the economy in the future. GFirst LEP have prepared the Local Industrial Strategy for Gloucestershire which was put to Government prior to the onset of Covid-19. The views of the Government are awaited. Local Plans provide for employment land across Gloucestershire, currently as follows:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Requirement</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	192ha B Class – across the JCS area	Completions, commitments, Plan allocations and windfall allowance
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	24ha B Class land between 2016-2031	Completions, commitments and plan allocations
<b>Forest of Dean</b>	Allocations Plan 2018	2006-2026	Not stated	New allocations and intensification of existing sites, criteria based policies (60+ha)
<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	192ha B Class – across the JCS area	Completions, commitments, Plan allocations and windfall allowance
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	58 hectares	Completions, commitments, Plan allocations and windfall allowance

<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	192ha B Class – across the JCS area	84ha on strategic allocations (some or all within Tewkesbury Borough)  40ha on proposed allocations in the emerging Tewkesbury Borough Plan  Other commitments and vacant employment land across the Borough.
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3.17. The parties have recently completed a new Gloucestershire Economic Needs Assessment (2020) which:

- Identifies the Functional Economic Market Area (FEMA) for planning purposes.
- Provides a review of the context in neighbouring areas and the wider region.
- Provides an assessment of the economic performance and characteristics and commercial property market.
- Considers a range of scenarios for future economic growth in Gloucestershire.
- Identifies the quantum of employment land required to meet these scenarios and the locational requirements of different sectors.

This work has been commissioned to directly inform the preparation of Local Plans across Gloucestershire.

### **The Green Belt**

3.18. Parts of Gloucestershire are designated as Green Belt, a designation dating from the Gloucestershire Development Plan of 1968 and extended by the Gloucestershire County Structure Plan in 1981. The fundamental intention the Green Belt is to prevent urban sprawl by keeping land permanently 'open'. Parts of Gloucestershire that offer good potential for promoting more sustainable development are in the green belt and so local plans – prepared with the overriding statutory objective on plan-makers of promoting sustainable development

- will have to consider whether changes to the area of green belt will have to be made, as national planning policy provides for.

- 3.19. Green Belt policy was originally conceived as a strategic policy for shaping the pattern of development – and it was identified through strategic planning documents when designated. It should be looked at strategically therefore, and this is a role for the GSoCG. If avoiding development in the Green Belt means that the development will have to go elsewhere, then the alternative locations must still need to contribute toward the overall spatial strategy and sustainable development objectives. For plans to withstand scrutiny the reasons for rejecting alternatives must be clearly given.

### **The Movement of People, Goods, Services and Information**

- 3.20. There is a clear need to provide for greater modal choice to provide for alternatives to the car and enable individuals to choose how they travel. Post COVID-19 there will be a need to work collectively to develop a financially sustainable transport offer that reflects the possible legacy of the pandemic on changes in demand to traditional journey patterns. Improvements in digital connectivity open opportunities for this and help support the management of the transport network.
- 3.21. As the county grows there is a clear need to increase the market share of rail through better regional connectivity and work with bus operators to identify sustainable solutions to develop a financially sustainable, socially inclusive and efficient countywide bus network. This will provide for areas not served by rail. It will also aid understanding of the decarbonisation transfer process the roles different parties will need to play supporting this. Cycling and Waling also provide a real opportunity to improve the physical and mental health of residents, improve air quality and ease congestion within urban areas.
- 3.22. In addition to supporting personal travel it is important to recognise the requirements of commercial operators to provide the most efficient way of transporting goods alongside reducing carbon emissions and improving air quality.
- 3.23. The movement of people, goods and services between and within places and spaces has a profound effect on the economy, the lives of residents and the environment. There is a clear relationship between the location, scale and form of growth and movement. This GSoCG provides the opportunity to maximise the opportunity to promote and enable shifts in movement behaviour through considering the location of existing and new populations and aligning movement solutions to enable the greatest impact and success.

### **Transport Provision**

- 3.24. Essential travel in Gloucestershire is heavily based on the private car. For the most part this is currently fossil fuel propulsion, but this will change dramatically in the plan making periods relevant to the GSoCG, as car technology is changing quickly, with electric and other forms of non-carbon emitting propulsion taking over, with manufacturers committing to phasing out fossil fuelled propulsion. The provision of publicly accessible electric charging is an important



commitment by the County Council and district authorities which will facilitate and speed this change to the car as a sustainable mode of transport. However, even with the uptake of electric vehicles proceeding as planned, Government and local carbon reduction targets can only be achieved if we also create communities that reduce the need to travel and through a significant shift to sustainable transport modes, such as walking, cycling and public transport. The GSoCG will need to take account of this fundamental change in outlook in considering sustainable locations for strategic land allocations for the future.

- 3.25. The housing and employment land strategic site selection purpose of the GSoCG provides a golden opportunity to enable much improved public transport connections for residents, both road and rail, to create the genuine choice for residents outlined in paragraph 3.21, and deliver the public transport aspirations of the Local Transport Plan.
- 3.26. Covid-19 has led to a significant increase in online retail and remote working. Clearly this has negative consequences on existing town centres, but the need to travel for retail purposes are diminishing. New technologies and initiatives are ever developing which may lead to a shift the way in which people, goods and services move, ranging from Electronic Vehicles and Autonomous Vehicles to Mobility as a Service (MaaS). The location, design and layout of new development need to take into account of these developments. Digital technology provides an alternative to movement, and this is covered in more detail below.
- 3.27. The Gloucestershire Local Transport Plan (LTP) sets out the current transport strategy for Gloucestershire to 2041. The plan provides for a range transport schemes which largely aim to cater for planned growth and seeks to promote modal shift in new developments.
- 3.28. Development beyond that identified in existing advanced or adopted local plans provides the greatest opportunity to influence future movement choices. The road and rail network, together with technological advances provides the opportunity for modal shift but investment will be required. The LTP sets out a range of aspirations and scenarios for catering for growth that could take place beyond 2031. These aspirations and scenarios need to be developed alongside decisions on the future locations of growth to make them effective and successful.

### **Digital Network**

- 3.29. Gloucestershire already has a strategic role in cyber security and this will grow significantly with the development of 'Cyber Central'. The County must position itself to take full advantage of this opportunity, from education to supporting industries to broader connectivity benefits for the community at large.
- 3.30. The movement of information digitally is becoming ever more relevant, and Covid-19 has proved the value of and need for quality connectivity, particularly for the service sector on which a large proportion of the Gloucestershire economy relies. Quality broadband services are increasingly a factor people consider when looking at the attractiveness of an area as somewhere to live. Gloucestershire has the opportunity to benefit from the comprehensive and inclusive roll out of high quality digital infrastructure to assist business and domestic users.

## Natural Environment and Green and Blue Infrastructure

- 3.31. Gloucestershire contains areas of great landscape value, some recognised by national designations and of huge value to residents and visitors alike, and these need to be conserved and enhanced for their own sake and for the distinctive character they give to Gloucestershire. At the same time, more people need ready access to environmental assets as has been highlighted during the Covid-19 pandemic, and there is 'quality in the ordinary'. An enhanced green infrastructure network of spaces and corridors would provide structure and identity to an area, benefit wildlife, create recreational opportunities and amenity, help in the management of water, and assist in carbon capture.
- 3.32. Green infrastructure as a connected network of multi-functional green and blue spaces and corridors is essential to the wellbeing of Gloucestershire and its people, and is something should be part of the spatial strategy and as such promoted through the GSoCG. Part of the appeal of Gloucestershire for residents and business alike is its natural environment.
- 3.33. There is a great deal of work underway in Gloucestershire by government agencies, local authorities and voluntary groups promoting various aspects of green infrastructure. This includes:
- The work promoted by the Gloucestershire Local Nature Partnership (GLNP) on natural capital baseline mapping and on the Nature Recovery Network that helps to underpin it.
  - The national Building with Nature Standards, developed in Gloucestershire (initiated by the GLNP and the Gloucestershire Wildlife Trust), provide planners and developers with evidence-based, how-to guidance on delivering high-quality green infrastructure
  - The emerging Environment Bill will mandate Biodiversity net gain for certain types of development, noting the National Planning Policy Framework (NPPF) already highlights the need to provide biodiversity net gain.
- 3.34. In 2015, the Green Infrastructure Working Group of the GLNP developed 'A Strategic Framework for Green Infrastructure in Gloucestershire' with consultation and agreement gained from Gloucestershire's local authorities (undergoing review in 2020-21).
- 3.35. Gloucestershire Vision 2050 identified the potential of a Regional Park. Stakeholders have been investigating the possibility, including identifying a possible location.
- 3.36. Furthermore, all authorities signed up to the GLNP Green Infrastructure Pledge in 2018 - a promise to commit to making Gloucestershire a pioneer of green infrastructure, creating a better, more attractive place to live, work and visit, as well as becoming an exemplar for the rest of the country.
- 3.37. Many of the local authorities in Gloucestershire have recognised the huge declines in biodiversity by declaring climate and ecological emergencies. Many policies and initiatives are

in place or are being developed around biodiversity and nature recovery showing a commitment to continuing to work in partnership to address biodiversity declines.

- 3.38. There is therefore a great deal to use and to build upon for improved and better valued green infrastructure, expressed through strategy/policy, as part of the spatial strategy embraced by the GSoCG.
- 3.39. Flood resilience will require a strategic response, including others beyond the boundary of Gloucestershire. Having a clear and agreed proposed flood resilience response will enable the Parties to engage with neighbouring authorities and regions in a coordinated way.

### **Energy Production**

- 3.40. There is a need to increase energy efficiency and reduce energy usage for residents, workers and visitors in Gloucestershire in order to achieve a net-zero carbon future. There are key opportunities to achieve this through commitments to more sustainable construction methods with improved building energy performance, as well as through shifts in transport modes. There is also opportunity to explore renewable and low-carbon energy generation projects, including community energy schemes.
- 3.41. The Gloucestershire Sustainable Energy Strategy (2019) includes 6 key ambitions for energy reduction in Gloucestershire and a road map of actions to establish the building blocks necessary, focusing on the next 6 years.

### **Health and Social Infrastructure**

- 3.42. Many of the matters above have a clear impact on health and wellbeing – to provision of quality green space and housing, providing opportunities for active travel, reducing emissions and improving air quality and so on. The relationship between spatial planning is not traditionally fully understood, but that relationship is becoming clearer.
- 3.43. Specifically here, early year, educational, health and cultural facilities including open space, need to be provided at least in balance with the needs of a growing and changing population, consistent with nurturing greater skills and wellbeing, and more inclusively. Provision should be made as close to where demand arises in an efficient and effective way and should not be an afterthought – provision is essential and should be planned as part of spatial planning. The needs of service providers need to be understood at an early stage to inform future planning. Careful consideration needs to be given to the viability of development.

### **Infrastructure Delivery**

- 3.44. The provision of infrastructure to support existing and new communities is obviously essential. This ranges from transport to education to green space, as discussed in various sections above. In order for infrastructure to be delivered effectively there is a need to:

- understand where demand will arise
  - identify, prioritise and agree on that infrastructure
  - consult with relevant infrastructure providers
  - identify funding mechanisms to enable infrastructure delivery
  - the viability of development.
- 3.45. Funding is secured in a variety of ways including through the collection of Community Infrastructure Levy funds, through s106 agreements, bids and grants administered by GFirst LEP, bids to various Government Agencies and so on. Most of these funding mechanisms are competitive – competition with other areas of the country for private and government investment, competition between competing infrastructure projects within the GSoCG area, or onsite competition between the various demands placed on the development sector. Gloucestershire has a good track record of winning competitive funding and the GSoCG will be a key tool in future bids in articulating the collective ambition and delivery of growth.
- 3.46. At a both a strategic and local, non-strategic level, infrastructure needs are identified in a range of statutory and non-statutory documents including Local Plans, Infrastructure Development Plans and annual Infrastructure Funding Statements, the Local Transport Plan, Education Place Planning Strategies, the Natural Capital initiative and so on.
- 3.47. There is no single source document that identifies the agreed strategic infrastructure requirements for Gloucestershire. Such a document, together with a clear strategic direction of growth in Gloucestershire, would present a solid basis to encourage investment in its various forms from the public and private sector. Furthermore, such an approach would fit well with current proposed reforms to the development contribution regime. The various strategic infrastructure concepts listed in the preceding sections will need to be planned for and funded.
- 3.48. Various pieces of work are either underway or under consideration. The parties are exploring the potential for a single Local Developer Guide for Gloucestershire. This document will provide a clear practice guide for developers on how the parties expect infrastructure to be funded by development, building upon adopted policies and standards set out in local plans.

### **Minerals and Waste**

- 3.49. There are strategic minerals deposits in Gloucestershire that should be secured until they need to be used, perhaps in association with appropriate development. These are dealt with through Minerals and Waste Local Plans developed by the County Council.
- 3.50. Sufficient provision needs to be made for the waste management facilities required to implement a positive and progressive reuse, recycle, recover approach to resources, striving towards the achievement of a circular economy.

**Appendix 3 - List of ‘Agreements’ not agreed by any and/or all parties**

Agreement Name and Number	Party/Parties not in agreement	Non agreement paragraph	Comment
Climate Change agreements 3-6	Tewkesbury Borough Council	<ol style="list-style-type: none"> <li>1. The parties agree that the climate and ecological emergencies presents risks to the county that are systemic, and unprecedented in scale and potential impact.</li> <li>2. The parties agree that responses to the climate and ecological emergencies must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.</li> <li>3. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate and ecological emergencies and wherever possible deliver a positive contribution to climate change mitigation and adaptation and ecological recovery. Responding to the Climate Emergency will be the ‘golden thread’ that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.</li> <li>4. The parties agree to investigate the use of alternative forms of energy generation, in line with environmental and landscape considerations.</li> </ol>	<p>TBC requested the deletion of references to “ecological emergencies in paragraphs 3 and 4 and paragraph 3.2 within the Appendix. TBC has not declared an ecological emergency and does not have a position on it. On that basis this is a something TBC is unable to commit to.</p> <p>TBC assert that any considerations of alternative forms of energy generation would be wider than environmental and landscape considerations. This requirement would be up top individual LA’s to take forward if they wished to so do but should not be within SOCG.</p>
Transport Provision agreement 18.	Tewkesbury Borough Council	<p>The Parties agree that local plans should contain policies requiring developments to contribute to quality of the walking and cycling network. This is in recognition of the role active travel will play a significant role in achieving carbon reducing ambitions and promoting a healthy and active</p>	<p>Due to the nature of the TBC area, the inclusion and assertion that cycling will become mass transit cannot be supported by TBC as it is not achievable and is</p>

		<p>society. <b>Cycling will become mass transit and routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities.</b> Cycling and walking should be at the heart of transport, place-making, and health policy.</p>	<p>unrealistic given the rural nature of the borough.</p>
<p>Natural Environment and Green Infrastructure agreement 24</p>	<p>Tewkesbury Borough Council</p>	<p>The Parties agree to work collaboratively to help conserve, manage and enhance the area's unique natural environment including areas of international and national landscape and biodiversity importance.</p>	<p>TBC considers this paragraph too restrictive. Appropriate development can take place within areas of special landscape and AONB.</p>
<p>Minerals and Waste 32</p>	<p>Tewkesbury Borough Council</p>	<p>The Parties will support the form and location of appropriate waste management facilities to positively support a progressive approach to waste management and press on with the move towards a circular economy. The Parties will actively discourage waste management facilities that do not contribute to the development of the circular economy.</p>	<p>TBC consider that the wording within this agreement is too restrictive as to where the council may wish to locate waste management facilities.</p>
<p>Minerals and Waste 34</p>	<p>Tewkesbury Borough Council</p>	<p>The Parties will seek to produce a reduction in the level of energy use, and this will be sought in part by the requirement for the incorporation of the most appropriate advanced technologies for energy generation from renewable sources and for energy conservation as part of significant new development schemes.</p>	<p>This is too restrictive. TBC is already looking at alternative sources of energy. It is helpful for the council to facilitate alternative forms of energy and to ensure that people have choice.</p>



Appendix 4 - Pro-forma Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground

Strategic Matter	Proposed Action	Anticipated Action Outcome	Action Timeline	Action Budget	Action Lead Officer	Action Team
Climate Change						
Housing						
Employment						
The Green Belt						
Transport Provisions						
Digital Network						
Natural Environment and Green Infrastructure						
Energy Production						
Health and Social Infrastructure						
Infrastructure Delivery						
Minerals and Waste						

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# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>4 May 2022</b>
<b>Subject:</b>	<b>Re-ballot for Gloucester BID second term</b>		
<b>Report Of:</b>	<b>Leader of the Council</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Jon McGinty, Managing Director</b>		
	<b>Email: jon.mcginty@gloucester.gov.uk</b>		<b>Tel: 01452 396200</b>
<b>Appendices:</b>	<b>1. Gloucester BID re-ballot prospectus</b> <b>2. Gloucester BID geographic coverage</b>		

## FOR GENERAL RELEASE

Note: The special circumstances for non-compliance with Access to Information Rule 5 and Section 100B (4) of the Local Government Act 1972 (as amended) (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were that the BID business plan was still under consultation and review and not available at that point in time.

Note: The special circumstances for non-compliance with Access to Information Rule 13 and Part 3, paragraph 9 of the Local Authorities (Executive Arrangements) (Meetings and Access To Information) (England) Regulations 2012 (that a Key Decision may not be taken unless a document containing information specified by the Regulations been published at least 28 clear days prior to the meeting at which the decision will be taken were that the BID business plan was still under consultation and review and not available at that point in time.

### 1.0 Purpose of Report

1.1 To note the intention of Gloucester Business Improvement District (BID) to re-ballot for a second term and to consider the Cabinet's support for this.

### 2.0 Recommendations

2.1 Cabinet is asked to **RESOLVE** to:

- (a) note the Gloucester BID's plans to re-ballot for a second term, and
- (b) delegate authority to the Director of Policy and Resources to cast a vote in favour of extending the BID for a second term through any qualifying rate-paying properties owned by the Council.

### **3.0 Background**

- 3.1 Business Improvement Districts (BIDs) are business-led partnerships which are created through a ballot process to deliver additional services to local businesses. They can be a powerful tool for directly involving local businesses in local activities and allow the business community and local authorities to work together to improve the local trading environment.
- 3.2 A BID is a defined area in which a levy is charged on all business rate payers in addition to the business rates bill. This levy is used to develop projects which will benefit businesses in the local area. There is no limit on what projects or services can be provided through a Business Improvement District. The only requirement is that it should be something that is in addition to services provided by local authorities. Improvements may include, but are not limited to, festivals and events, extra safety/security, cleansing and environmental measures. The relevant local authority (Gloucester City Council in this case) manages the billing and the collection of the levy, and holds the levy in a ring-fenced revenue account on behalf of the BID body.
- 3.3 During 2016-17, a proposal to create a Gloucester BID was developed and submitted to the Council, and a ballot of qualifying businesses took place. Each person entitled to vote in the BID ballot has one vote in respect of each hereditament (business premise) in the geographical area of the BID on which non-domestic rates are payable. The ballot has to meet two tests. First, a simple majority of those voting must vote in favour. Second, the aggregate rateable value of the hereditaments of those voting in favour must exceed the aggregate rateable value of the hereditaments of those voting against.
- 3.4 In July 2017, 85.8% of voting businesses voted in favour in the first ballot for a Gloucester BID, and 87.7% of the Rateable Value voted in favour. As a result, Gloucester BID was established and has been in operation since July 2017. The BID collects an annual levy from 572 hereditaments (business premises), each of whom pay an annual levy derived from 1.6% of the rateable value of their premises.
- 3.5 BIDs may be established for a term of up to five years. Every five years, businesses are able to vote to continue the BID for a subsequent term, based on a set of proposals. Gloucester BID aims to build on its success in delivering a safer, attractive and supported city for a new potential five-year term, and has developed a business plan or prospectus for a second term (Appendix 1), on which it has consulted with all potential BID members.
- 3.6 The Vision for Gloucester BID set out in this prospectus is: 'Working in partnership to deliver a safer, more attractive, vibrant and supported city.' To achieve this vision, Gloucester BID is proposing to focus on three key themes:
- Priority 1 – A Safer City
  - Priority 2 – An Attractive and Vibrant City
  - Priority 3 – A more Supported and Promoted City
- 3.7 Some key elements in the prospectus for a second term include:
- Continuing to co-fund and manage a team of City Protection Officers in association with Gloucester City Safe, Gloucester City Council and the Office of the Police and Crime Commissioner.

- Continuing to co-fund and deliver with Gloucester City Council a team of Night Safe Officers who patrol Eastgate Street and the city centre.
- Continuing to work in partnership with the Council and other partners to maintain and develop Gloucester's Purple Flag status.
- Promoting the Best Bar None awards alongside Gloucester City Council's management of them.
- Supporting the work of Street Medics in helping make Gloucester's night time economy a safe place.
- Continuing to install summer planters and hanging baskets, and maintaining existing wooden planters in partnership with Gloucester City Council.
- Working in partnership with Gloucester City Council to ensure city cleansing and appearance is a priority, including introducing additional hot-spot cleansing that is not delivered by the Council.
- Partnering to deliver footfall driving events to attract visitors, encourage return visitors and promote local businesses.
- Helping member businesses sign up to the Gloucester Gift Card programme and the national Mi Rewards app, and promote this.
- Promoting and amplifying local businesses and events in the BID area, holding regular networking opportunities and acting as a voice for businesses.
- Working in partnership with the University of Gloucestershire and Gloucestershire College to support education and activities in our city.

3.8 The BID proposal includes some minor changes to the geographic boundaries of the BID area, and these are illustrated in Appendix 2 (more details are available on request). Gloucester BID has submitted its notice to hold a re-ballot to the relevant Secretary of State, with a proposed ballot date of 30<sup>th</sup> June 2022, and has asked the Council to administer the ballot and declare the result. In the view of officers, all necessary documents and procedures have been produced/ followed by Gloucester BID to enable a re-ballot to take place, and the business plan meets the legislative requirements.

#### **4.0 Social Value Considerations**

4.1 The BID is not under the control of the Council but an independent body, hence the provisions of the Council's Social Value policy do not apply in connection with any procurements undertaken by the BID.

#### **5.0 Environmental Implications**

5.1 The BID business plan contains a number of proposals that would enhance the attractiveness of the city, for instance through the provision of planting.

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

6.1 Cabinet could choose to instruct officers to cast votes against the proposed continuation of the Gloucester BID. This is not recommended as the Gloucester BID has delivered many benefits for its member businesses since its establishment in 2017, and has produced a good plan for its continuation over the next five years.

6.2 There are no apparent legal grounds for vetoing the holding of a re-ballot, as formally requested by the BID proposer (Gloucester BID).

## **7.0 Reasons for Recommendations**

7.1 The Gloucester BID has delivered many benefits for the member businesses of Gloucester since its establishment in 2017 and has produced a good plan for its continuation over the next five years.

## **8.0 Future Work and Conclusions**

8.1 If the resolutions are agreed, the Director for Policy and Resources will take steps to ensure that Council-owned business premises vote in favour of the BID's continuation. If the re-ballot is successful, other officers will continue to work closely with the BID to deliver baseline and enhanced services as set out in the prospectus.

8.2 If the BID's re-ballot is not successful, the Council's role in wrapping up the affairs of the BID and resolving the ownership of its assets is prescribed in Regulations.

## **9.0 Financial Implications**

9.1 As part of its business plan, Gloucester BID has asked the Council to:

- Reduce its levy administration fee from 3% to 2%.
- Increase by £5,000 its annual contribution towards the salary costs of the City Protection Officers
- Cover the costs of administering the re-ballot.
- Continue its contribution to other partnership activity, in line with any agreed baselines.

9.2 In the view of officers, and following consultation with the Leader of the Council, these all appear to be reasonable asks that can be accommodated within existing budgets.

9.3 If the re-ballot is successful, the Council will continue to contribute to the levy as a member of the BID, being the owner of many business premises within the BID area. This will be in line with existing budgets.

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

## **10.0 Legal Implications**

10.1 The rules governing the creation, ballot, funding and administration of BIDs are largely set out in The Business Improvement Districts (England) Regulations 2004.

10.2 There are no significant implications arising from this report.

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

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

11.1 If the re-ballot is unsuccessful, a number of the good works and activities that the BID fund contributes towards could fall back onto the Council to provide or resource, which would have revenue implications. These include such activities as resourcing the City Protection Officers.



11.2 The benefits and opportunities that would arise if the BID ballot is successful are summarised above.

## **12.0 People Impact Assessment (PIA)**

12.1 A PIA is not applicable.

## **13.0 Community Safety Implications**

13.1 The BID business plan contains a number of proposals that would improve community safety through the City, including:

- Ongoing provision of City Protection Officers, Night Safe Officers and support for the Street Medics team.
- Support for Purple Flag status for the City Centre, and support for the Best Bar None awards for responsible licensing.

## **14.0 Staffing and Trade Union Implications**

14.1 None.

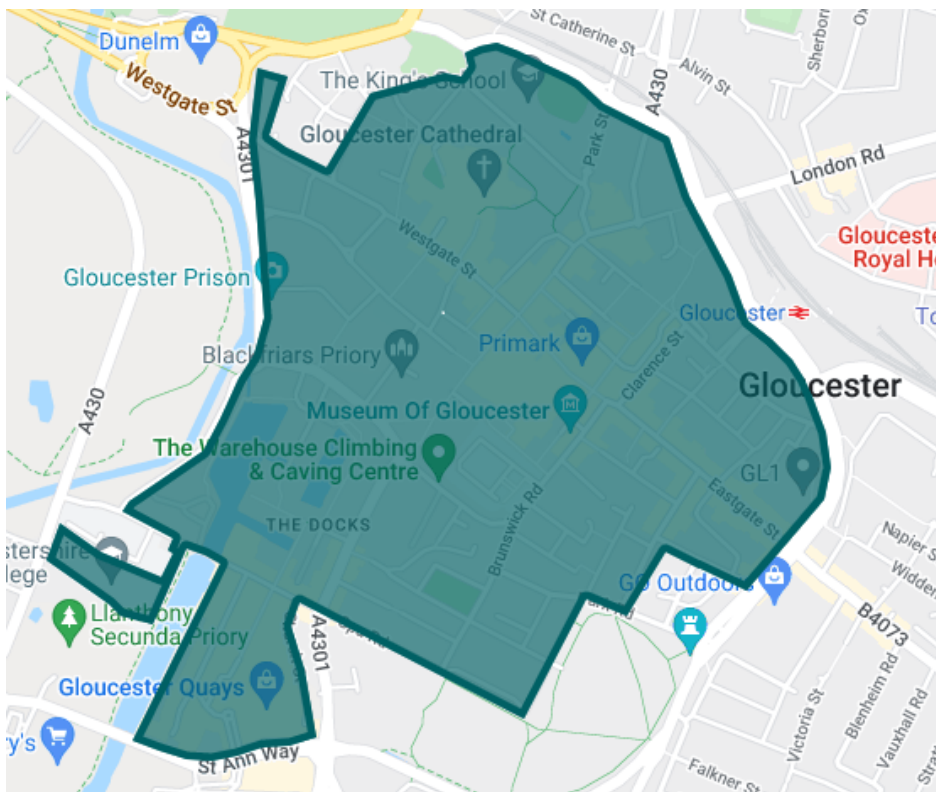
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## APPENDIX 2 – Gloucester BID geographic coverage

2017-2022 BID geographic area:



Proposed 2022-2027 BID geographic area (full list of qualifying streets available on request)



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# Gloucester City Council

<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>4 May 2022</b>	
<b>Subject:</b>	<b>Leisure and Culture options appraisal, contract extension and interim arrangements</b>			
<b>Report Of:</b>	<b>Cabinet Member for Culture and Leisure</b>			
<b>Wards Affected:</b>	<b>All</b>			
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>	
<b>Contact Officer:</b>	<b>Philip Walker, Head of Culture</b>			
	<b>Email:</b>	<b>philip.walker@gloucester.gov.uk</b>	<b>Tel:</b>	<b>39-6355</b>
<b>Appendices:</b>	<b>A. Exec Summary – management options appraisal</b> <b>B. High Level Resource Plan</b>			

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 To provide a summary of the position of the existing culture and leisure provision
- 1.2 To present the key findings from an options appraisal and make recommendations on the future provision of leisure and culture.
- 1.3 To present the interim arrangements for the existing leisure contract with Aspire until new arrangements are finalised.
- 1.4 To present a High-Level Resource plan outlining the next steps and indicative costs to implement the reports recommendations.

### 2.0 Recommendations

2.1 Cabinet is asked to **RESOLVE** that;

- (1) The report is accepted and the actions noted.
- (2) The contract period with Aspire Leisure and Culture trust be extended by a further 12 months on the condition that a Partnership Development Plan is agreed for the duration of this extension.
- (3) Agreement is given to follow the recommended route to procure a new leisure contract from an external provider
- (4) In-house service is retained for Cultural services, whilst services are transformed in line with the council plan and options for future delivery of cultural provision are explored.
- (5) Delegated authority to implement these recommendations is given to the Head of Culture in consultation with the Director of Policy & Resources and Cabinet Member for Leisure and Culture.

### 3.0 Background and Key Issues

#### 3.1 Background

- 3.1.1 Gloucester City Council commissioned The Sport, Leisure and Culture Consultancy (SLC) to complete an independent leisure services assessment and management options appraisal (Appendix A – Exec Summary) to understand the Council's options for future delivery of the services. The Council owns two leisure centres, GL1 Leisure Centre and Oxstalls Sports Park that are managed by Aspire Sports and Cultural Trust. The contract is primarily based on a lease with the Council holding landlord responsibilities. The lease is scheduled to end in September 2023.
- 3.1.2 In addition to exploring the options for Leisure, the options appraisal included looking at the council's own in-house Cultural provision to explore whether there might be efficiencies or advantages through combining both these areas under one arrangement in future.
- 3.1.3 For each service, future delivery options of in-house management, Local Authority Trading Company (LATC), or tendering to an external operator were explored in depth. Financial models were analysed, including an assessment of risk exposure, risk transferability and access to external funding. In addition, a non-financial appraisal was conducted that assessed the benefits and drawbacks of each in relation to Climate Change, Wider Social Value, Reducing Inequality, Increasing inclusion and participation, Social responsibility, Empowering Communities and Innovation.
- 3.1.4 The report concludes that there is no particular advantage to be gained from combining Cultural and Leisure provision under one contract. Whilst there are examples of some operators that combine these at a local level, there are very few leisure operators that operate cultural venues and vice-versa.
- 3.1.5 An assessment of the council's current strategic framework for leisure shows that there is currently a gap between the Council's ambitions in the Gloucester City Plans and service delivery in the two leisure centres. The new Gloucester City Plan (2021 - 2024) represents a significant opportunity to re-position leisure services, so they contribute towards the new priority of addressing inequality, specifically health inequalities. At present the Council does not have a strategic approach to leisure, sport and physical activity which informs its commissioning arrangements with Aspire, nor does it have clear performance indicators (KPIs) that would help manage such a contract.

## **3.2 Leisure options appraisal conclusion**

- 3.2.1 The report makes the strongest case for procurement to a third-party leisure operator. Overall, where the procurement of a multi-site trust operator is considered the most advantageous management option for the Council's Leisure services. However, SLC suggest that there is significant work to be done to make the service 'procurement ready'.
- 3.2.2 The report identifies challenges for leisure and recommends addressing some of the service weaknesses. For example, undertaking asset condition surveys to help understand the whole life costs and developing a strategic approach to leisure. Other improvements suggested include developing a service specification that is focused on narrowing health inequalities in the city. The council's facilities have ageing



buildings, a lack of on-site car-parking at GL1 and there is the need for an improved offer of services and activity at the sports and leisure sites.

- 3.2.3 The council is advised to extend the current contract with Aspire by at least 12 months to Sept 2024 in conjunction with an interim Partnership Delivery Plan – to be agreed with Aspire board and management team. Thereafter a series of additional areas of work are identified as being advantageous to conduct before the procurement exercise is started. These include the steps identified in Appendix B of the report to ensure that the council is 'procurement ready'. In this way the council will be procuring from a position of strength and reducing the risk to procurement of a suitable operator.

### **3.3 Cultural Services appraisal conclusion**

- 3.3.1 The report identifies challenges with ageing buildings and limited capacity that make the financial model for the cultural buildings a challenge. The report identified opportunities for growing the festivals and events offer for the city and recommended a strategic review of cultural provision to see where best the city should invest its resources for greatest impact.
- 3.3.2 The report concludes that whilst there are challenges with the current operating model of the cultural services, there were no significant advantages to out-sourcing or changing the existing delivery model for Cultural Services.
- 3.3.3 There are 7 recommendations for the area of Cultural services to explore, beginning with a strategic review of the current investment, impact and offer.

### **4.0 Social Value Considerations**

- 4.1 Sports and Leisure activity is closely linked to health and well-being. The Council's new priority focused on inequality presents a significant opportunity to re-focus leisure services on contributing towards narrowing health inequalities in the City. This will require a clear strategic approach to raising physical activity levels, particularly for those groups that are inactive or have underlying health issues.

### **5.0 Environmental Implications**

- 5.1 Leisure services, as one of the Council's major contributors of carbon can play a significant role in the Council's climate emergency agenda. Coupled with rising energy prices there is a major incentive for both the Council and its leisure operator to invest in technology to reduce emissions. Investment would need to be driven by the Council although an external leisure operator may invest if it can gain return over the life of the contract.
- 5.2 Cultural venues are expecting investment through recent successful capital bids and other schemes implemented by the council. Investment into the Museum of Gloucester and Gloucester Guildhall energy efficiency measures will reduce energy consumption and lower carbon impact of these services.

### **6.0 Alternative Options Considered**

- 6.1 **Combine Culture and Leisure contract** – not recommended, as efficiencies would not outweigh the risk to quality of provision.
- 6.2 **Local Authority Trading Company** – not recommended for either Leisure or Culture as it was assessed as the second most-costly option and a time-consuming process.

## **Leisure**

- 6.3 **Procure a leisure management provider** to operate from October 2023. This is considered a risky option without a clear strategy for Sport and Leisure provision, up to date condition surveys, or a clear investment strategy being in place at the point of commencement. Timescales are tight and the council may be at a disadvantage in relation to the market by going ahead whilst the leisure sector is still recovering from the pandemic and while there is a lack of certainty over inflation and fuel price fluctuations. Not recommended.
- 6.4 **Bring the leisure contract in-house from Sept 2023.** The report demonstrates that this is the most costly option for the council and is therefore not recommended.
- 6.5 **Continue with current arrangements and extend lease with Aspire** – not recommended. The council wishes to procure a new arrangement rather than to continue as currently in order to have a clearer distinct relationship with the provider in future contract, without council dependency.

## **Culture**

- 6.6 **Create an out-sourced Trust model for Culture** - Not recommended currently. Whilst a trust model could have some advantages in terms of eligibility for funding from trusts and foundations, it was not considered to be optimal at this stage but remains a viable option for future delivery.

## **7.0 Reasons for Recommendations**

- 7.1 The options appraisal makes the strongest case for procurement of a leisure operator to be procured through a market procurement exercise.
- 7.2 The timeframe to ensure that the city council gets the best results from such a procurement exercise is recommended to be extended by 12 months with an interim plan to support the existing contract and create a smooth transition to a new contract.
- 7.3 Cultural provision can be improved through efficiencies and careful planning, programming and investment with the correct business planning and focus. Gloucester is identified as a priority place for culture by Arts Council England, so is in a strong position to make the case for further investment into cultural services in the coming 3 years.
- 7.4 This options appraisal makes clear that there are no significant advantages to outsourcing deliver of Cultural services and to maintain in-house service delivery for the time being.

## **8.0 Future Work and Conclusions**

- 8.1 Explore and implement the recommendations of the report for Leisure including;
- Agreed extension of contract with Aspire subject to agreement of the implementation of the Partnership Development Plan
  - Development of a Sports and Leisure Strategy
  - Completion of condition surveys of leisure assets
  - Review council resources required to manage the Partnership Development Plan
  - Consider joint procurement approach with University of Gloucestershire for Oxstalls Park management
  - Production of specification of services for procurement
  - Conduct procurement exercise for Leisure
- 8.2 Explore and implement where possible the recommendations for Culture including;
- Retaining in-house provision
  - Conducting a strategic review for Culture
  - Condition surveying of cultural assets to understand whole-life costs
  - Developing a suite of KPIs for Cultural services
  - Options for Guildhall business model and partners
  - Explore ways to grow its successful festivals and events programme
  - Development of a fundraising trust for Museum of Gloucester

## **9.0 Financial Implications**

- 9.1 The costs to implement the recommendations are outlined in Appendix C.
- 9.2 Costs will be required for the following;
- Condition survey of the city's leisure buildings and assets
  - Creation of a Sports and Leisure strategy for Gloucester, linked to health and well-being and the council plan
  - Development of a Capital Investment Plan into the leisure facilities to maintain, upgrade facilities in the city.
  - Development of a specification for future leisure service provision
  - Procurement of a leisure delivery partner for Sept 2024 and beyond
- 9.3 Costs for the above amount to circa £104k as described in Appendix B.
- 9.4 The costs identified at 9.3 above will be either be managed from existing budgets or taken from an appropriate earmarked reserve.

## **10.0 Legal Implications**

- 10.1 The Council has powers to provide such recreational facilities as it sees fit pursuant to Section 19 of the Local Government (Miscellaneous Provisions) Act 1976.
- 10.2 The Council must observe the requirements of its contract procedure rules and the applicable provisions of the Public Contracts Regulations 2015 in conducting the procurement exercise.

10.3 The Council will also need to comply with other legislative requirements such as the Transfer of Undertakings (Protection of Employment) Regulations 2006 (in respect of staff) and Data Protection legislation (in respect of personal data/customers).

10.4 One Legal can provide procurement advice as the project progresses.

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

11.1 None

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

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

### **13.0 Community Safety Implications**

13.1 None

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

14.1 None

**Background Documents:** Update to Gloucester's Cultural Vision and Strategy 2021-26  
[gloucester-cultural-vision-and-strategy-gct-gcc-min.pdf](#)



# Leisure and Cultural Services Assessment and Management Options Appraisal

Gloucester City Council

April 2022

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# Leisure Services executive summary and recommendations

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## Introduction and background

- 1 Gloucester City Council has commissioned The Sport, Leisure and Culture Consultancy (SLC) to complete an independent leisure services assessment and management options appraisal to understand the Council's options for future delivery of the services.
- 2 The Council owns two leisure centres, GL1 Leisure Centre and Oxstalls Sports Park that are managed by Aspire Sports and Cultural Trust, created in 2008 from the Council's previous in-house team. The contract is primarily based on a lease with the Council holding landlord responsibilities and does not contain a detailed services specification. The lease is scheduled to end in September 2023.
- 3 Prior to the global pandemic in financial year 2018/19 the management fee to/from Aspire was £ zero and the annual turnover of the two leisure sites was £2.59 million. Like all leisure services nationally, the service has required funding support from the Council supplemented by Sport England's National Leisure Recovery Fund through the three national lockdowns. Council support has included loans and deferring payments for utilities.
- 4 It should be noted that **this report uses data from financial year 2019/20**, before the full impact of the pandemic impacted on leisure services. This means that the financial assessment in particular provides a comparison of management options but does not reflect how leisure services finances may look going forward
- 5 Also, this work took place during the Council's recovery from a cyber incident and as a result it was not possible to extract all data regarding the service.

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## Strategic framework

- 6 The Council's current strategic framework for leisure shows that there is currently a gap between the Council's ambitions in the Gloucester City Plans and service delivery in the two leisure centres.
- 7 The new Gloucester City Plan (2021 -2024) represents a **significant opportunity** to re-position leisure services, so they contribute towards the new priority of addressing inequality, specifically health inequalities.
- 8 At present the Council does not have a strategic approach to leisure, sport and physical activity which informs its commissioning arrangements with Aspire. This would normally be in the form of a services specification which includes clear outputs and key performance indicators (KPIs).

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## How effective are the Leisure Services?

- 9 The current leisure contract and the Council's performance management framework does not contain any KPIs. As a result, there are no formal expectations from the Council regarding the level of community engagement with the service or the quality of delivery. Contractually, Aspire need to adhere to the terms of the lease. This means it is difficult to monitor the progress of the service.
- 10 Positively, Aspire offers a range of services and interventions which are focused on providing social value to Gloucester residents including the City's largest swimming and swimming lesson programme. In 2019, Aspire launched a Health and Wellbeing Hub in GL1 working with health



partners including Gloucester Community Wellbeing Team, the 2gether Trust (physiotherapists specialising in mental health services), and Gloucestershire Care Services NHS Trust (Macmillan Cancer Rehabilitation Specialists). Many councils are aspiring to develop similar hubs, but few have actually achieved this.

- 11 There are some significant issues with GL1 which need to be considered before the Council commissions future management arrangements:
- The building is starting to age and may need substantial lifecycle and maintenance costs going forward – the Council has not yet carried out an asset condition survey to identify future costs.
  - The offer at GL1 needs to be reviewed identifying potential to invest in re-purposing parts of the building to attract those not using the current facilities.
  - Parking is a significant weakness, and the Council needs to make affordable/free access for leisure users to existing car parks a priority.

12 When assessing the effectiveness of the service, it could be said that the service is providing significantly more social value than the Council has contractually asked Aspire to deliver.

13 The Council and Aspire have worked together effectively to keep the service running through the pandemic.

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#### How efficient are the Leisure Services?

14 The annual management fee as at 2018/19 was at £ zero and Aspire did not receive financial support from the Council. For centres with significant swimming facilities this represents a good outcome, particularly in the context of GL1 with its lack of parking and large footprint. However, it should be noted that this management fee was only made possible by Aspire supporting the service through its reserves.

15 Key financial efficiency ratios such as income recovery and the percentage of staff costs in relation to sales are what would be expected from a solid trust operation with the exception of management costs, which are proportionally high due to the lack of economies of scale associated with small leisure providers.

It should be noted that energy costs (heating and lighting) were £304K in 2019/20 for the Council's two centres. The current energy market could see increases of over 70% in future which means this is likely to have a significant adverse impact on the financial model in the future. GL1 is currently one of the most significant creators of carbon in the Council's asset portfolio.

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#### Management options appraisal

16 Three core management options have been considered:

- **Local Authority Trading Company (LATC).** This would be an arm's length' organisation set up by the Council to run the facilities and services. A LATC which is often referred to as a "Teckal" company. These companies do not have charitable status, but as not-for-profit entities are able to benefit from similar tax exemption benefits to a leisure trust.
- **In-house management.** This approach is familiar to many local authorities and is often the baseline default position for comparison in an options appraisal. In the case of the Council, it involves the transfer back to in-house management after a previous outsourcing arrangement.
- **Re-tendering the contract to a multi-site trust operator.** This is still the most common management approach amongst local authorities in England. This could include Aspire partnering with a Multi-Site Operator.

17 The Council wishes to understand what the likely outcome would be under current market conditions and assess whether the financial arrangements with Aspire offer value for money and are financially sustainable.

18 The Council, with input from SLC developed evaluation criteria for the options appraisal which include financial and non-financial criteria shown in Figures ES2 and ES3.

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### Financial appraisal

19 SLC has undertaken a “*shadow bid*” of the three management options based on 2019/20 financial data. This provides a comparison of the potential costs of each management model but should not be used as an indication of service costs going forward.

20 The in-house model is likely to be the costliest because:

- There is potential loss of VAT exemption on leisure income due to the Council being close to its de minimis limit and unable to claim exemption on additional income, estimated at £254K per annum.
- Net loss in NNDR exemption benefit estimated at £250K per annum.
- There are additional employer pension costs as staff move to local government terms and conditions.

21 Procurement resulting in a multi-site trust operator would offer the least costly solution because:

- The multi-site trust operator would get the maximum VAT and NNDR relief.
- A multi-site operator would expect high income levels for health and fitness.
- Multi-site trust operators run on low management costs and overheads.
- Procurement savings on supplies and service.

22 A multi-site trust operator appointed through procurement would expect to draw profits from the contract.

23 There is the potential of Aspire partnering with a multi – site operator to combine local knowledge and expertise with economies of scale. This model has been successfully implemented in a number of contracts in England.
















24 The LATC is likely to offer a mid-range financial solution. It would benefit from VAT exemption and not be required to offer local government terms and conditions but would have comparatively high management costs and no NNDR relief.

25 Set up or procurement costs including officer time are estimated at £50K for in-house, £200K for LATC and £180K for competitive procurement.

26 Procurement of the contract to a multi-site trust operator is likely to require the least revenue support from the Council. However, this analysis does not take into account rising energy prices, increased staff costs due to post-pandemic shortages and reduced income levels as the service recovers from the pandemic. These post-pandemic factors apply to all management models. As a result, based on the existing service without investment there **is no prospect of the service running at zero subsidy or better in the future.**

27 Figure ES1 shows the financial appraisal based on the evaluation criteria agreed with the Council. Each has been graded Red (negative), Amber (neutral) and Green (positive).

Figure ES1: Leisure Financial Appraisal










Criteria	In-House	LATC	Procurement/Trust
Likely revenue cost or surplus of management model			
Degree in which the management model can provide financial certainty			
Degree to which the management model can provide commercial risk transfer			
The degree to which the management model can offer transfer of asset repairs and maintenance risk			
The degree to the management model may be able to access external funding.			










54 The high-level evaluation indicates that procurement to a multi-site trust operator will offer the most advantageous financial outcome with commercial and operational risk transfer. Through a leisure contract it is likely to offer some financial certainty although this would not include during the pandemic.

#### Non-financial appraisal

55 Figure ES2 shows the non-financial or social value appraisal based on the agreed evaluation criteria.

Figure ES2: Non-financial appraisal

Criteria	In-House	LATC	Procurement/Trust
Climate Change			
Wider Social Value			
Reducing Inequality			

Criteria	In-House	LATC	Procurement/Trust
Increase in inclusion and participation			
Socially responsible & empowering communities (partnership working)			
Innovation			

87 The non-financial and social value appraisal of the three management options is more balanced between the different models.

88 **Leisure services, as one of the Council’s major contributors of carbon can play a significant role in the Council’s climate emergency agenda.** Coupled with rising energy prices there is a major incentive for both the Council and its leisure operator to invest in technology to reduce emissions. This opportunity applies to all management models. Investment would need to be driven by the Council although a multi-site leisure operator may invest if it can gain return over the life of the contract.

89 All three management models have some potential to contribute towards wider social value and reducing inequality through training and employment opportunities, and the wider benefits of reducing health inequalities by getting people more active. For the LATC and leisure trust options this would need to be specified in the services specification. The in-house model could be more flexible but lacks the capacity of a multi-site leisure operator.

90 Each management model would be focused on increasing inclusion and physical activity participation providing, in the case of a LATC or multi-site leisure trust, this is set out in the services specification. Multi-site leisure operators normally have more marketing and digital communications capacity to help drive participation.

91 The in-house model would be better positioned to work in partnership with communities to enable them to have local physical activity opportunities run by themselves. However, may need to invest additional resources to make this happen.

92 A multi-site leisure trust operator would bring more innovation than in-house or a LATC. Larger operators have head office resources for product development, marketing, ICT and asset management. However, the leisure contract and services specification would need to be set up in a way that encourages innovation.

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#### Leisure options appraisal conclusion

93 Overall, procurement of a multi-site trust operator is the most advantageous management option for the Council. However, there is significant work to be done to make the service *‘procurement ready’*. This includes addressing some of the service weaknesses including parking at GL1, undertaking asset condition surveys to help understand the whole life costs,

developing a strategic approach to leisure and a services specification which are focused on contributing towards narrowing health inequalities in the City.

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### Soft market testing

94 SLC undertook soft market testing in December 2021 and received responses from eight multi-site trust leisure operators. The results of which are summarised in Figure ES3.

#### Figure ES3: Soft marketing testing summary



All operators expressed interest in the portfolio



Consensus for 10–15 year contract



4 operators expressed interest in - including cultural venues



Operators accept full commercial risk



7 operators indicated interest in managing university facilities



Shared maintenance and utilities risk.



Strong preference for an outreach programme to tackle health inequalities

95 Despite challenges presented by COVID recovery, there remains a good level of interest from the multi-site trust leisure operator market in new contract opportunities, with operator actively bidding, or willing to explore potential new partnerships.

96 All operators expressed an interest in managing the portfolio of facilities.

97 Although the response was mixed, there is some appetite from the leisure operator market to integrate the leisure facilities and cultural facilities under a single management contract. This could bring synergies across the services and provide a joined-up approach to delivery.

98 There is strong consensus on the value of an outreach programme designed to help tackle inactivity and health inequalities in the wider community. All of the established leisure operators have experience in delivering such programmes.

99 In light of the pandemic, there is a clear requirement from operators that any new contract(s) will need to provide protection against future similar scenarios. The preference would be for the Sport England model contract to be used with the inclusion of a Change in Law Clause.

100 Most of the multi-site trust leisure operators confirmed they would accept full commercial risk from the start of the new contract, subject to there being suitable provisions in the contract (see above) and business continuing to recover over the coming months.

101 The general preference of multi-site trust leisure operators is that maintenance risk is shared with the Council.

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### What are the challenges and opportunities for Leisure Services?

102 With the contract ending in September 2023 and the effects of the pandemic still impacting on leisure income, Aspire may need to explore partnering with a multi-site operator to enable them to bid for the new contract.

- 103 The Council lacks a full understanding of the condition of its two leisure centres and their future maintenance and lifecycle costs. These are needed to understand potential whole life costs before committing to a long-term management contract.
- 104 The long-term impact of the pandemic on leisure income is still uncertain. As of December 2021, nationally health and fitness income was at c. 74% of pre-Covid levels. Swimming however is recovering well with many leisure centres reporting that they are back to full capacity for swimming lessons. If there is long term behaviour change towards other forms of physical activity and health and fitness income does not fully recover this will have a major impact on the finances of many leisure contracts and the expectations of operators when bidding for contracts. Councils and operators may need to look at re-purposing leisure buildings, reducing the emphasis on health and fitness and providing alternative ways of getting people active.
- 105 GL1 is starting to age and in need of investment and possibly some re-purposing to make it more attractive to potential bidders and customers. The parking situation if unaddressed will inhibit any growth at the centre.
- 106 However, there are some significant opportunities for the Council to improve its leisure services both financially and in terms of delivering social value.
- 107 The Council's new priority focused on addressing inequalities presents a significant opportunity to re-focus leisure services on contributing towards narrowing health inequalities in the City. This will require a clear strategic approach to raising physical activity levels, particular for those groups that are inactive or have underlying health issues.
- 108 Whilst GL1 is starting to age, the size and nature of the building opens up opportunities for investment and re-purposing. A well-crafted investment strategy should deliver both an improved financial performance and more social value.
- 109 The two leisure centres represent a significant share of the Council's carbon emissions. There is potential to reduce this and mitigate against rising energy prices by investing in energy saving technology.

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#### Leisure Services recommendations

- 110 SLC has provided the following core recommendations based on the findings from the service assessment and management options appraisal. See Figure ES4.

#### Figure ES4: Core Recommendations

##### Recommendation 1

**The Council should adopt procurement of a multi-site leisure trust operator as its preferred management option. In order to become 'procurement ready' the Council should extend the tenure of Aspire by at least one year through a different arrangement that enables the Council to have more control over the service whilst it prepares for the procurement.**

This will enable the Council to develop a strategic approach to leisure and enable it to develop a new sustainable leisure contract, focused on narrowing health inequalities.



### Recommendation 2

**To enable the Council to prepare for procurement, it should work with Aspire to establish a financially sustainable, jointly agreed plan covering from now until the end of the contract. The plan could be in the form of a Partnership Delivery Plan (PDP) which includes:**

- Contract extension to at least September 2024
- A sustainable financial plan which clearly identifies the level of Council support taking into consideration Covid recovery monitored through open book accounting.

This will enable the Council to take back control of the service as it prepares for procurement.

### Recommendation 3

**The Council should develop a strategic approach for leisure that re-positions leisure towards contributing to narrowing health inequalities in the City. This should include a new performance management system that can be embedded into the new leisure contract.**

This will enable the Council to provide a more effective service.

### Recommendation 4

**The Council needs to understand the condition of its leisure facilities and their whole life costs for the next 10 – 15 years.**

This will provide visibility of the whole life costings of the leisure facilities.

### Recommendation 5

**The Council should review the client-side resources needed to initiate its plans to consolidate and transform leisure services.** This includes developing and managing a Partnership Delivery Plan with Aspire and preparing for the subsequent procurement.

### Recommendation 6

**The Council should continue to work with the University of Gloucester at Oxstalls Sports Park with a view to having co-ordinated management arrangements for the tennis centre and University facilities. This includes undertaking a joint procurement.**

This will enable development of a joined-up offer for residents at the sports park

## Implementation

- 120 Due to the need to secure management arrangements beyond September 2023, an indicative implementation timetable for the key recommendations is set out in section 7 of the main report.
- 121 This is based on commencing engagement with Aspire to develop a Partnership Delivery Plan as soon as possible, an extension of one year on the Aspire contract and a new leisure contract commencing in October 2024.
- 122 A high-level resource plan for delivering leisure transformation is provided in section 7.2.

# Cultural services executive summary and recommendations

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1 Gloucester City Council (GCC) has commissioned The Sport, Leisure and Culture Consultancy (SLC) to complete an independent high level service assessment and management options appraisal of its Cultural Services.

2 The Council's cultural venues, museum and events service are currently managed in-house through its Cultural Services department, they have been run in a traditional way for a number of years, undergoing little transformation during this time.

3 Cultural Services operations and management is principally focussed on three areas of activity:

- **Cultural Venues:** Gloucester Guildhall arts centre which incorporates a flexible 200-seat (400 standing) events space and a separate 70-seat single screen digital cinema. The mediaeval Blackfriars Priory leased by the Council from English Heritage, promoted as a hireable venue for functions and weddings
- **Museum of Gloucester:** an accredited museum that tells the story of Gloucester's historic past. It also hosts small visual arts exhibitions and the Tourist Information Centre
- **Events:** providing permissions and advice for organisers wishing to host events in parks or open spaces owned by the Council. The events team also promote manages and operate several festivals and events including; Gloucester Tall Ships Festival, Gloucester Goes Retro, Gloucester History Festival and the Bright Nights Festival. They also manage the City's Civic events.

4 Prior to the pandemic in 2019/20 the Council spent £978K on Cultural Services excluding capital and maintenance, most of which relates to the Museum and Guildhall.

5 It should be noted that this report uses data from 2019/20, before the full impact of the pandemic impacted on cultural services leisure services. This means that the financial assessment in particular provides a comparison of management options but does not reflect how finances may look going forward. It does not reflect where the service is now as it recovers from the pandemic.

6 Also, this work took place during the Council's recovery from a cyber incident as a result it was not possible to extract all data regarding the service.

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## Strategic framework

7 Gloucester City Council's strategic plans have synergy with a world embarking on its post-Covid journey to recovery. A City vision is progressing from internal spaces of constrained cultural buildings in the 2020-2021 Plan to the external and potential of major impacts delivered in open spaces through high-profile cultural festivals and events as outlined in the 2021 – 2024 draft Plan.

8 The Plan prioritises festivals and events; not only to assist the city's economic regeneration, but its ability to achieve social value ambitions. The Gloucester Cultural Trust also acknowledges the social value of broadening the City's cultural offer and developing an engaging and innovative events and festivals programme.

9 The Council has only published a plan for one of Cultural Service's three core functions, a Museum Development Plan. However, the Plan has no detailed strategic objectives nor associated performance indicators.

10 There is a 'strategy gap' between the Council's ambitions for culture and what is delivered at the Guildhall.

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### How effective are Cultural Services?

11 As at 2019/20, the Council does not have performance data for cultural services that tracks progress against Key Performance Indicators (KPIs). Neither does it measure usage and utilisation of its cultural programmes. This means that it is not possible to fully assess how effective the services are against the Council's cultural ambitions.

12 Gloucester's cultural infrastructure may be judged historically as under-valued and under-developed. The City has only one cultural organisation - *Strike a Light* - supported with Arts Council England National Portfolio Organisation (NPO) funding. This may be further reflected in that Arts Council England (ACE) has identified Gloucester as one of 54 places across England in which its investment and engagement is too low, and therefore prioritising working with them from 2021 to 2024.

13 The City has good events spaces including Gloucester Quays, Kingsholm Stadium, and Gloucester Park. Kings Square will open in 2022 as a large public events space.

14 Gloucester's events programme features several Signature events: the biennial Tall Ships Festival & Triennial Three Choirs Festival. It also hosts events with potential for growth such as the Bright Nights Festival.

15 A new funding scheme for external event has been introduced for 2022 with strengthened eligibility criteria to better manage the funding application process and ensure that events are measured against Council plans.

16 The Museum of Gloucester is an accredited Museum with a collection of over 750,000 objects relating the City's history. The Museum became free admission in April 2019. From April 2019 to March 2020, the Museum of Gloucester attracted 84,079 visitors some of which relates to the Tourist Information Centre.

17 The 2019/20 Annual National Museum survey indicates that local visitors contributed £738,668 to the local economy and day visitors £3,288,843 giving a total estimated economic impact of visitors to the Local Economy of £4,027,510.

18 A new funding scheme for external events has been introduced for 2022 with strengthened eligibility criteria to better manage the funding application process and ensure that events are measured against Council plans.

19 The buildings managed by Cultural Services, particularly the Guildhall have significant physical drawbacks and limitations:

- The frontage of the building lacks public presence
- The auditorium's small seating capacity places most mid-range touring acts' fees out of reach with box office splits unattractive for performers
- Additionally physical deficiencies such as lack of stage wings or for flying flats constrain its programming and reduces its ability to attract either professional or amateur performing arts companies.

20 In 2019/20, Gloucester Guildhall sold 23,515 tickets for 63 shows at its live events programme, and 10,603 tickets for 581 film screenings in the cinema.

21 Officers report that audiences that use the Guildhall place great value on it as a cultural asset.

- 22 The new Guildhall leadership has recognised the requirement for a more diverse and exciting programming policy that needs to be tailored to Gloucester residents. This includes making greater use of the sprung floor to create a new dance programme strand.
- 23 There are investment plans for expanding the Guildhall main hall's bar servery to achieve both greater efficiency and generate higher bar sales. There are also plans to reduce cinema daytime screenings and the café hours to reduce costs.
- 24 The Cultural Service's offer plays a role in creating social value, supporting wider community benefits such as social cohesion, engaging diverse audiences and contributing to health and well-being. However, there is a lack of data to fully demonstrate how effective its interventions are.

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### **How efficient are Cultural Services?**

- 25 In 2019/20 the Council had a net spend of £978K on Cultural Services. This equates to a subsidy of 46% as percentage of gross turnover. This figure compares to an average subsidy of 8.4% by Local Authorities for Arts Council England (ACE) clients.
- 26 The most significant element of the Council's investment is staffing - which cost £684K in 2019/20. This is equal to 102% of their earned income (sales). This ratio is high for any customer facing service.
- 27 The Council's investment in the Guildhall is equivalent to a subsidy of £19.60 for each ticket sold to the public. This is greater than the Guildhall's average net ticket price of £15.26.
- 28 The Council's investment in the Gloucester Museum is equivalent to a subsidy of £5.37 per visitor.
- 29 The Museum of Gloucester generates only £85K in self-earned income which is significantly less than ACE museum clients in England that on average generate £3 of income for each £1 of public sector grant received.
- 30 This data reflects the nature of the cultural buildings and not the management arrangements. Cultural Services cannot make significant improvements without transformation and reducing the reliance on ageing, inefficient buildings.

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### **Challenges for Cultural Services**

- 31 We have identified some key questions and challenges for the Council regarding its cultural services:
- Will Council funding remain focussed on costly and limited physical facilities?
  - Is it possible to significantly improve their viability?
  - How will its current services recover from the pandemic? Will there be permanent increases in cost such energy and staff and will income ever return to pre-pandemic levels?
  - Can Cultural Services be transformed to capitalise on outdoor spaces for cultural engagement and growing impactful events?
  - Is there a shift of resource needed towards cultural activities that can help the City gain bigger and better social, community engagement and economic impacts achieved through major events?
  - Should role of Cultural Services be as an enabler, and provide leadership to a growing cultural sector working across the City?

- How best can the Service access new income streams?
- What should the relationship between the strategically tasked Gloucester Cultural Trust and the Council's Cultural Services which are the City's asset based direct cultural deliverers.

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### **Management options appraisal**

32 Three core management options have been considered:

- Local Authority Trading Company (LATC). This would be an arm's length' organisation set up by the Council to run the facilities and services. A LATC which is often referred to as a "Teckal" company. These companies do not have charitable status, but as not-for-profit entities are able to benefit from similar tax exemption benefits to a leisure trust.
- In-house management. This approach is familiar to most local authorities. Cultural Services in Gloucester have always been managed through this approach.
- Tendering a contract to a multi-site trust operator. Some authorities have done this for cultural services although this is normally part of a package of services including leisure which tends to be the main interest of trust operators.

33 Several local authorities have transferred cultural assets to local trusts or community groups but at this stage there are no such local organisations capable of taking on cultural building such as the Museum of Gloucester and Guildhall.

34 The Council, with input from SLC developed evaluation criteria for the options appraisal which include financial and non-financial criteria shown in Figures ES7 and ES8.

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### **Financial appraisal**

35 SLC have undertaken "a shadow bid" of the three management options based on 2019/20 financial data shown in Figure ES5. This provides a comparison of the potential costs of each management model but should not be used as an indication of service costs going forward.



Figure ES5: Management Models - Financial Comparison

Cultural Services Shadow Bid	2019/20 Actual	LATC	Procurement
Guildhall/Blackfriars Income	£586,094	£586,094	£586,094
Guildhall Expenditure	-£1,046,934	-£1,046,934	-£1,046,934
Guildhall/Blackfriars Deficit	-£460,840	-£460,840	-£460,840
Museum Income	£77,838	£77,838	£77,838
Museum Expenditure	-£528,983	-£528,983	-£528,983
Museum Deficit	-£451,145	-£451,145	-£451,145
ShopMobility Income	£20,760	£20,760	£20,760
ShopMobility Expenditure	-£86,557	-£86,557	-£86,557
ShopMobility Deficit	-£65,797	-£65,797	-£65,797
<b>Baseline Operational Subsidy</b>	<b>-£977,782</b>	<b>-£977,782</b>	<b>-£977,782</b>
<b>KEY DIFFERENCES:</b>			
Medium Term Staff Pension Savings	£0	£68,492	£68,492
NNDR Savings*	£0	£0	£12,000
Other Expenditure Savings	£0	£0	£21,467
Operator Profit	£0	£0	-£54,775
<b>SubTotal</b>	<b>£0</b>	<b>£68,492</b>	<b>£47,184</b>
<b>TOTAL PROJECTED SUBSIDY/SURPLUS</b>	<b>-£977,782</b>	<b>-£909,290</b>	<b>-£930,598</b>
<b>Indicative Set Up/Procurement Costs</b>	<b>£0</b>	<b>£200,000</b>	<b>£180,000</b>

36 The financial analysis indicates that there is no significant difference between the projected financial outcomes of the three financial models.

37 This differs to leisure services where there are significant differences because:

- NNDR savings are minimal for a trust operation because cultural buildings already benefit from special exemptions for NNDR.
- VAT exemption has much less impact on cultural services due to lower income levels and activities that qualify for VAT exemption. The Council will already be benefiting from any exemptions on income and expenditure.
- Whilst there may be staff savings in the long term as new recruits move onto non-local government terms and conditions this will take time to implement through staff turnover. However, this is from a baseline of the current staff costs due to TUPE.
- A multi-site trust operator may be able to make procurement savings on supplies and services, but this will be more than offset by any profit or surpluses taken.
- Crucially, it is unlikely that a multi-site trust operator would see the potential to improve the income of the services (in particular the Guildhall) due to the condition and limitations of the buildings.

38 Additionally, there are set up or procurement costs for a LATC or procurement which are estimated at £200K and £180K respectively including legal, external consultant, project management and dedicated client resources.

39 Figure ES6 shows the financial appraisal based on the agreed evaluation criteria. Each has been graded Red (negative), Amber (neutral) and Green (positive).

**Figure ES6: Financial Appraisal – Cultural Services**

Criteria	In-House	LATC	Procurement/Trust
Likely revenue cost or surplus of management model	●	●	●
Degree in which the management model can provide financial certainty	●	●	●
Degree to which the management model can provide commercial risk transfer	●	●	●
The degree to which the management model can offer transfer of asset repairs and maintenance risk	●	●	●
The degree to the management model may be able to access external funding.	●	●	●

40 All three management options will result in the services running at a significant subsidy. Due to the nature of the museum and Guildhall a trust operator is unlikely to see any potential for increased income generation.

41 Although it may be possible through a contract with a trust to have more certainty on future finances and transfer commercial risk this would be on the basis of a management fee similar to the current subsidy.

42 Similarly, a contract with a multi-site trust operator may offer some transfer of reactive repairs and maintenance risk but they would build in the risks associated with the condition buildings into their financial model.

43 All three management options would be eligible for external funding although a trust model would be more attractive to some funders as opposed to providing grants to the Council or a LATC.

44 **In short, there are no significant financial or risk transfer differences between the three different management models for Cultural Services.**

**Non-financial appraisal**

45 Figure ES7 provides a summary of the non-financial appraisal or social value for Cultural Services.

**Figure ES7: Non-financial appraisal**

Criteria	In-House	LATC	Procurement/Trust
Climate Change			
Delivering wider Social Value			
Reducing Inequality			
Increase in inclusion and participation			
Socially responsible & empowering communities (partnership working)			
Innovation			
Sustainable City developing distinctive high quality cultural projects, festivals and events in the City.			

46 Most of the assessment against the criteria indicate that the management model is neutral (amber).

47 The Guildhall and Museum are large buildings which require significant expenditure on energy for heating and lighting. In 2019/20 the cost of energy was £71K (including Blackfriars). As such, there is potential to utilise energy saving technology to reduce consumption and carbon emissions, contributing towards the Council’s climate emergency agenda. This applies equally to all management models and the investment would need to come from the Council.

48 A larger multi-site trust operator is likely to be able to offer wider social value than a LATC or in-house as they may have connections with other cultural services and be able to offer better training, volunteering opportunities etc. Volunteers are more likely to support a trust rather than the Council.

49 The Council has a good understanding of its local communities in the City and be able to work partnership with existing partners to improve local cultural services opportunities.

50 The assessment of each cultural management options indicates that there is no significant difference between the three management models from a non-financial perspective. Changing the management model alone is unlikely to improve financial or social value outcomes from Cultural Services on behalf of residents.

51 Changing the current in-house management model, at this stage, to a LATC or trust is unlikely to result in any improvements to finances or social value. To achieve this the Council needs to undertake transformation and review whether its current focus on cultural buildings, which require considerable revenue funding is the most effective and efficient way to deliver its ambitions for culture in Gloucester.

52 Transformation will be better undertaken through an in-house management model where the Council has complete control over the services, without the barriers and complexities of contractual arrangements with a partner operator.

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### Recommendations

53 SLC has provided recommendations for Cultural Services based on the service assessment and management options appraisal. See figure ES8.

#### Figure ES8: Cultural Services Recommendations

##### Recommendation 1

**The Council should retain its current in-house management arrangements for Cultural Services and focus on service transformation.**

This will enable the Council to have the flexibility and control needed to transform services.

##### Recommendation 2

**The Council should complete a thorough strategic review of its Cultural Services. The review should identify options for transforming the service and how to maximise social value from its revenue and capital resources including challenging its current approach focused on cultural buildings.**

This will enable the Council to review the cultural offer in the City as whole, and decide where it can most effectively develop and enhance cultural opportunities for visitors and residents with the resources it has.

##### Recommendation 3

**The Council needs to understand the condition of its Cultural Services buildings and their whole life costs for the next 10 – 15 years.**

#### **Recommendation 4**

**The Council should develop a suite of KPIs that help understand the usage of cultural services, the levels of resident and visitor engagement and subsidy levels for particular programmes.**

This will enable the Council to understand about the effectiveness and efficiency of the current cultural offer and provide information to target service transformation.

#### **Recommendation 5**

**The Council should explore alternative uses and tenants for the Guildhall**

This could improve the usage of the building and release significant revenue funding for transforming cultural services.

#### **Recommendation 6**

**The Council should explore ways of growing its successful events and festivals programme.**

This could potentially lead to higher levels of engagement with residents and visitors contributing towards a more vibrant city centre.

#### **Recommendation 7**

**The Council should explore establishing a development fundraising trust for Cultural Services. Initially, this could be for the Museum of Gloucester.**

This will enable the Council to access funding which it is currently not eligible for.

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Appendix C: Leisure Transformation - Indicative Resource Plan and budget requirement

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
<b>1. Develop a Partnership Delivery Plan with Aspire to cover April 2022 – September 2024.</b>	Draft Partnership Delivery Plan		Leisure consultant resources covered within Options Appraisal budget	February 2022
	Develop financial model April 2021 – September 2024	2		March 2022
	Agree PDP with Aspire	2		March – May 2022
<b>2. Implementation of Sport England’s Quest™ quality assurance programme to provide an audit of service standards, benchmarked against similar leisure facilities.</b>	Engage Right Directions, (Quest Programme Operator) to deliver pre-Quest advice	1	£1.2K	June 2022
	Prepare Aspire for assessment	1		June – August 2022
	Quest Assessment at GL1 and Oxstalls Sports Park	2	£2.4K	September 2022

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
<p><b>3. The Council should develop a strategic approach for leisure (Sport and Physical Activity Strategy or Health and Wellbeing Strategy /Active Gloucester Strategy).</b></p>	<p>Light touch Strategy using existing data:</p> <ul style="list-style-type: none"> <li>Selected Consultation: other public service partners including Public Health, the University, CGC, other WCC departments</li> <li>Analysis of existing data related to health and physical activity</li> <li>Development of strategic objectives for sport and physical activity linked to the Council Plan and narrowing health inequalities. This would be through a workshop with senior officers and Members</li> <li>Development of KPIs linked to strategic objectives that can be embedded in a new leisure contract.</li> </ul> <p>(Excludes any public consultation)</p>	5	<p>Leisure consultants</p> <p>£12K-£15K</p>	April – June 2022

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
<p><b>4. The Council needs to understand the condition of its leisure facilities and their whole life costs for the next 10 – 15 years.</b></p>	<p>Commission condition surveys to a specialist organisation with experience in leisure:</p> <ul style="list-style-type: none"> <li>• Structural, Mechanical and Electrical Surveys</li> <li>• 15 year forward maintenance and lifecycle projected costs for GL1 and Oxstalls</li> <li>• Profiled costs.</li> </ul>	2	<p>Specialist surveyors to cover GL1 and Oxstalls.</p> <p>£12K - £15K</p>	April – June 2022
<p><b>5. Leisure Investment Strategy and Business Case focused mostly on GL1</b></p>	<p><b>Option 1:</b> The Council establishes options, capital costings and business case for potential investment.</p> <ul style="list-style-type: none"> <li>• Assessment of need and demand for facilities including supply and demand assessment</li> <li>• Assessment of facility capacity and areas of underutilisation</li> <li>• Stakeholder consultation</li> <li>• Identification of potential opportunities for less traditional physical activity programmes and facilities e.g. clip and climb, Parkour</li> <li>• Architect assessment of opportunities for alternative uses</li> <li>• Community consultation</li> <li>• Consider community hub opportunities</li> </ul>	6	<p>Leisure consultant including architect and cost consultant input.</p> <p>Budget range £35K - £45K.</p>	July – October 2022

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
	<ul style="list-style-type: none"> <li>• Development of options capturing industry best practice and emerging trends</li> <li>• Options shortlisting</li> <li>• Outline architect block drawings (RIBA 1)</li> <li>• Fully costed capital costings</li> <li>• Revenue business case.</li> </ul>			
	<p><b>Option 2:</b> The Council establishes high level options for leisure investment to be implemented by the Operator. Solutions and business cases to be developed by bidders through the procurement process based on a capital budget agreed by the Council with the operator contributing to repayments through the management fee.</p> <p>The Leisure Investment Strategy will provide guidance and red lines to bidders for them to formulate solutions.</p> <ul style="list-style-type: none"> <li>• Assessment of need and demand for facilities including supply and demand assessment</li> <li>• Development of options capturing industry best practice and emerging trends</li> <li>• Architect assessment of opportunities for alternative use</li> <li>• Options shortlisting</li> <li>• High level business case to provide guidance for bidders for the new leisure contract.</li> </ul> <p><i>(Excludes any public consultation)</i></p>	3	<p>Leisure Consultant developing high level options and business cases.</p> <p>Budget range £12K - £15K.</p>	July – September 2022

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
<p><b>6. Procurement of a Trust Operator to commence October 2024</b></p>	<p>Additional Procurement Project Management including:</p> <ul style="list-style-type: none"> <li>• Procurement project plan</li> <li>• Leading project meetings</li> <li>• Consolidating all GCC internal comments and amendments to draft procurement documents specifically, SSQ, Services Specification, developing the procurement documentation from draft stage to published documents</li> <li>• Organising bidders' market interest day</li> <li>• Developing procurement data room.</li> <li>• Co-ordinating evaluation panel.</li> </ul>	<p>15</p> <p>(This likely to be higher by c. 15 days if GCC undertaking procurement project management)</p>	<p>Leisure Consultant can provide project management support.</p> <p>Budget £10K – 15K.</p>	<p>Ongoing May 2022 to July 2024</p>

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
	<p>Development of the procurement strategy including:</p> <ul style="list-style-type: none"> <li>• Soft market testing</li> <li>• Internal workshop to establish the Council’s needs and preferred contract position</li> <li>• Contract scope (whether to add other services to the two leisure centres such as physical activity outreach and outdoor pitches)</li> <li>• Develop strategic objectives and KPIs for the contract</li> <li>• Risk allocation</li> <li>• Identifying affordability (shadow bid) including the impact of any investment.</li> <li>• Contract length</li> <li>• Contract procedure</li> <li>• Procurement procedure.</li> </ul>	6	<p>Leisure Consultant.</p> <p>£12 - £15K.</p>	May 2022 – October 2022



Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
	<p>Drafting procurement documentation based on Sport England Guidance:</p> <ul style="list-style-type: none"> <li>• Internal workshop to establish the Council’s core requirements for the Services Specification</li> <li>• Supplier Selection Questionnaire drafting</li> <li>• Services Specification drafting</li> <li>• Invitation to Tender drafting</li> <li>• Leisure Operating Contract drafting</li> <li>• Risk allocation matrix (in conjunction with the Council’s legal team).</li> </ul>	<p>GCC legal 15 GCC client 10</p>	<p>Leisure consultant.  Drafting ITT, Specification, and SSQ.  £10K - £12K.</p>	<p>January 2023 April 2023</p>
	<p>Evaluation of bids assuming three staged process, SSQ, Initial Tender and Final Tender.</p> <ul style="list-style-type: none"> <li>• SSQ evaluation</li> <li>• Initial Tender evaluation</li> <li>• Negotiation meetings with bidders</li> <li>• Final Tender evaluation.</li> </ul> <p>Contract award</p> <ul style="list-style-type: none"> <li>• Input into Cabinet report</li> <li>• Drafting letters to unsuccessful bidders.</li> </ul> <p>(Depends on the number of bids at each stage of the procurement).</p>	<p>20 days spread across different departments including finance, legal, estates, procurement.</p>	<p>Leisure consultant.  £12K -£15K depending on the number of bids.</p>	<p>July 2023 – May 2024</p>

Recommendation	Activity	GCC Resources (Officer Days)	External support Resources/Budget Range	Timescales
Total Indicative Budget Range		Up to c104 days	Range £83.6K - £123.6K	



<b>Meeting:</b>	<b>Cabinet</b>	<b>Date:</b>	<b>4 May 2022</b>
<b>Subject:</b>	<b>ICT Services: Options Report</b>		
<b>Report Of:</b>	<b>Cabinet Member for Performance and Resources</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework:</b>	<b>No</b>
<b>Contact Officer:</b>	<b>Bob O'Brien, Transformation and Commercialisation Manager</b>		
	<b>Email: bob.o'brien@gloucester.gov.uk</b>	<b>Tel:</b>	<b>396110</b>
<b>Appendices:</b>	<b>None</b>		

**FOR GENERAL RELEASE**

The Report is available for General Release.

**1.0 Purpose of Report**

1.1 To ensure continuation of ICT services beyond the current contract end date of 30 April 2022 and make recommendations for future provision.

**2.0 Recommendations**

2.1 Cabinet is asked to **RESOLVE** that:

- (1) the content of this report be received and noted
- (2) the option to 'do nothing' be dismissed
- (3) the option to procure on the open market be dismissed
- (4) ICT services be moved to an in-house provision at the earliest opportunity, whilst a review of viable options for long term delivery of ICT services is undertaken, to consider:
  - (a) Joining an existing Local Authority services ("Teckal") company or a shared service
  - (b) Bringing the services in-house
  - (c) Procurement via a compliant framework
- (5) delegated authority be given to the Director of Policy and Resources (in consultation with the Cabinet Member for Performance and Resources and the Council Solicitor) to implement these decisions and the outcome of the review of viable options.

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

3.1 The Council's contract for ICT Services comes to an end on 30 April 2022.

3.2 Following a comprehensive options appraisal, on 13 October 2021 Cabinet **RESOLVED** that:

- (1) The assessment and analysis set out in [that] report [was] received and noted.
- (2) The option to procure the services via a compliant framework agreement is taken forward as the preferred option.
- (3) Gloucestershire County Council are thanked for their co-operation in reviewing the shared service option.
- (4) Delegated authority be given to the Head of Policy and Resources (in consultation with the Cabinet Member for Performance and Resources and the Council Solicitor) to determine procurement route, contract duration, conclude contractual negotiations, and implement these decisions.

3.4 By January 2022, a compliant framework had been selected and negotiations were at an advanced stage to enter into a new arrangement with Civica UK Ltd; the service descriptions, annexes, and terms and conditions had been reviewed and agreed in principles by both parties.

3.5 In February 2022, Civica unexpectedly withdrew from the process following an internal review, leaving future arrangements for Gloucester City Council's ICT service uncertain. Civica have indicated that they are willing to extend the existing ITO arrangement while we find an alternative option.

3.6 An extension to the existing ITO arrangement for a period of up to 18 months is in the process of being agreed with Civica. This will allow time to review options and enable a managed exit; a 3-month notice period has been built into the extension to allow the Council to exit when ready.

### **4.0 Options considered**

4.1 Option A – do nothing

4.2 Doing nothing is not a realistic option as services would default to transitioning to a new arrangement in an uncontrolled way. This could result in a costly and disruptive transition.

4.3 Option B - Joining an existing Local Authority services ("Teckal") company or a shared service

4.4 It is recommended that the possibility of joining an established Local Authority "Teckal" company arrangement or shared service is considered alongside other options. No procurement would be required and there could be benefits to be had from working alongside other councils whilst retaining a high degree of control.

#### 4.5 Option C - Open market

4.6 This option was previously dismissed because:

- This national procurement process is likely to take 12 months or more and will consume significant resource for the Council
- The cost of change is likely to be higher than the other options considered due to increased procurement costs and the likely need to employ a suitably qualified and experienced Project Manager
- There is a risk that key talent exits before transfer from Civica to the new provider

4.7 For these reasons and the fact that this option would take the longest to implement, it is recommended that this option is dismissed.

#### 4.8 Option D – Bring services in house

4.9 This option was previously considered to be a possibility but was dismissed due to cost uncertainty (mainly due to higher overheads and LGPS pension contributions), service quality (concern that in-house arrangements risked limiting access to industry expertise), and the fact that it was an untested solution. Considering Civica's decision to withdraw from the process, it is recommended that this option is now revisited and explored in more detail.

4.10 Since Civica withdrew from entering into a new arrangement with the Council, it has become increasingly clear that the advantages of remaining in a relationship with Civica for core ICT services are no longer there; there is clear movement away from IT outsourcing and a pivot towards software services. During the extension period, ICT provision will be mostly met by the local Civica team assigned exclusively to the Gloucester account and third line expertise will increasingly rely on third parties. This has the potential to cause resource issues and results in the erosion of contract expertise over time. Each engagement with a third party will also incur overhead charges.

4.11 Therefore, it is recommended to move to an in-house solution at the earliest opportunity whilst we continue to assess the best way to provision ICT services in the long term.

#### 4.12 Option E – New arrangement via a compliant framework

4.13 Enquiries in autumn 2021 indicated that the services could be obtained via the following framework agreements within the same cost envelope of our existing service:

- Crown Commercial Services Technology Services 3
- Kent Commercial Services – Software and Services Framework

4.14 Subsequent work has verified this assumption and so this option remains viable and should be explored further.

### **5.0 Social Value Considerations**

5.1 These will be considered as part of the subsequent options appraisal work.

## **6.0 Environmental Implications**

6.1 There are no environmental implications as a result of this report.

## **7.0 Alternative Options Considered**

7.1 These are considered in main body of this report.

## **8.0 Reasons for Recommendations**

8.1 To ensure continuity of services post 30 April 2022.

8.2 To allow time to revisit the options available for future delivery of ICT services.

8.3 To transition to new arrangements in a controlled way that minimises the risk of disruption to services.

8.4 The recommendations set out in the main body of this report reflect the conclusions of the options appraisal process to date and assessment by Officers.

## **9.0 Future Work**

9.1 An extension to the existing ITO agreement of up to 18 months is in the process of being agreed. This will allow time to transition services to an in-house arrangement in a controlled way whilst long term options for the future delivery of ICT services (as outlined in the main body of this report) are explored in detail.

## **10.0 Financial Implications**

10.1 There are no direct financial implications as a result of this report.

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

## **11.0 Legal Implications**

11.1 The Public Contracts Regulations 2015 allow for an extension of the contract on the basis that the Council's inability to procure a new provider is not of its own making i.e. it "has been brought about by circumstances which a diligent... authority could not have foreseen;"

11.2 In addition:

- (i) the extension should not alter the overall nature of the contract: there must be no significant departure from the existing contract terms; and
- (ii) the price of the extension must not exceed 50% of the value of the original contract.

11.3 The council will need to publish a notice advising of its intention on central government's Contracts Finder website and, if that expires without challenge,



formally vary the contract to extend its term. This can be accomplished by a deed of variation or the contract's own change procedure.

11.4 If the Council procures a service using a framework it will have to abide by that framework's rules in regard to selecting a supplier and utilise the framework's terms and conditions and other documentation.

11.5 Utilising a "Teckal" company to obtain the services would require the Council to join as a shareholder with the accompanying governance responsibilities. A shared service, while not being subject to the companies regime, would still require a formal agreement setting out the Council's and other parties' rights and responsibilities such as payment, service levels and governance.

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

## **12.0 Risk & Opportunity Management Implications**

12.1 Key risks and opportunities are discussed in the main body of the report.

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

13.1 A PIA Screening Stage will be undertaken to identify any potential or actual negative impact and a full PIA will be completed if required.

## **14.0 Community Safety Implications**

14.1 None.

## **15.0 Staffing & Trade Union Implications**

15.1 TUPE will apply when services are brought in-house. Full implications will need to be explored before notice is given to exit the Civica extension.

**Background Documents:** None

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