



Wednesday, 13 March 2024

TO EACH MEMBER OF GLOUCESTER CITY COUNCIL

Dear Councillor

You are hereby summoned to attend a **MEETING OF THE COUNCIL** of the **CITY OF GLOUCESTER** to be held at the Civic Suite, North Warehouse, The Docks, Gloucester, GL1 2EP on **Thursday, 21st March 2024** at **6.30 pm** for the purpose of transacting the following business:

AGENDA

1. **APOLOGIES**

To receive any apologies for absence.

2. **MINUTES (Pages 17 - 44)**

To approve as a correct record the minutes of the Council Meeting held on 22 February 2024.

3. **DECLARATIONS OF INTEREST**

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.

4. **CALL OVER**

(a) Call over (items 9-13) will be read out at the meeting and Members invited to reserve the items for discussion.

(b) To approve the recommendations of those reports which have not been reserved for discussion.

5. PUBLIC QUESTION TIME (15 MINUTES)

The opportunity is given to members of the public to put questions to Cabinet Members or Committee Chairs provided that questions do not contravene the provisions set out Council Procedure Rule 10.01.

To ask a question at this meeting, please submit it to democratic.services@gloucester.gov.uk by 12 noon on Friday 15 March 2024 or telephone 01452 396203 for support.

Questions and responses will be published at least 24 hours before the meeting. Supplementary questions may be put and answered during the meeting, subject to the relevant time limit.

6. PETITIONS AND DEPUTATIONS (15 MINUTES)

The opportunity is given to members of the public to present a petition or deputation provided that any such petition or deputation does not contravene the provisions set out Council Procedure Rule 11.01.

To present a petition or deputation at this meeting, please provide the subject matter to democratic.services@gloucester.gov.uk by 12 noon on Friday 15 March 2024 or telephone 01452 396203 for support.

7. ANNOUNCEMENTS

To receive announcements from:

- a) The Mayor
- b) Leader of the Council
- c) Members of the Cabinet
- d) Chairs of Committees
- e) Head of Paid Service

8. MEMBERS' QUESTION TIME

a) Leader and Cabinet Members' Question Time (45 minutes)

Any member of the Council may ask the Leader of the Council or any Cabinet Member any question upon:

- Any matter relating to the Council's administration
- Any matter relating to any report of the Cabinet appearing on the Council's summons
- A matter coming within their portfolio of responsibilities

b) Questions to Chairs of Meetings (15 Minutes)

Questions and responses will be published at least 24 hours before the meeting. Supplementary questions will be put and answered during the meeting, subject to the relevant time limit.

ISSUES FOR DECISION BY COUNCIL

9. CLIMATE CHANGE STRATEGY AND ACTION PLAN (Pages 45 - 128)

To consider the report of the Leader of the Council and Cabinet Member for Environment seeking adoption of a Climate Change Strategy and Action Plan, to be issued for public and key stakeholder consultation.

10. CITY CENTRE CONSERVATION AREA (CCCA) APPRAISAL AND MANAGEMENT PLAN (Pages 129 - 228)

To consider the report of the Cabinet Member for Planning and Housing Strategy seeking approval for the adoption of the updated draft of the City Centre Conservation Area Appraisal and Management Plan as a Supplementary Planning Document.

11. CAPITAL STRATEGY 2024/25 (Pages 229 - 238)

To consider the report of the Cabinet Member for Performance and Resources seeking approval of the Capital Strategy 2024/25

12. TREASURY MANAGEMENT STRATEGY 2024/25 (Pages 239 - 276)

To consider the report of the Cabinet Member for Performance and Resources seeking approval for the Treasury Management Strategy 2024/25 and the prudential indicators.

13. PAY POLICY STATEMENT 2024/25 (Pages 277 - 286)

To consider the report of the Cabinet Member for Performance and Resources concerning Council's Pay Policy Statement for 2024/25.

MOTIONS FROM MEMBERS

14. NOTICES OF MOTION

1. PROPOSED BY COUNCILLOR O'DONNELL

"I rise today to propose a motion that addresses the need for inclusivity in our community's play parks. It is essential that we prioritize the accessibility and enjoyment of recreational spaces for all residents, regardless of their abilities or disabilities. By making all play parks in Gloucester all-inclusive by December 2026, we can create a more welcoming and equitable environment for children and families of diverse backgrounds.

The importance of inclusive play parks cannot be overstated. These spaces provide children with opportunities for physical activity, social interaction, and imaginative play, fostering their development and well-being. However, traditional play parks often lack the necessary features and amenities to accommodate

individuals with disabilities, limiting their participation and enjoyment. By making our play parks all-inclusive, we can ensure that every child has the opportunity to play, learn, and grow in a safe and accessible environment.

This motion aims to achieve several key objectives:

1. **Accessibility for All:** By making all play parks in Gloucester all-inclusive, we can ensure that children of all abilities have equal access to play equipment, facilities, and amenities. This will create a more inclusive and welcoming environment for children with physical, sensory, or cognitive disabilities, allowing them to fully participate in play activities alongside their peers.
2. **Safety and Design Standards:** Implementing all-inclusive design standards in our play parks will enhance safety and usability for all children. Features such as wheelchair-accessible ramps, sensory play elements, and inclusive seating areas will improve the overall play experience and accommodate a diverse range of needs and preferences.
3. **Community Engagement and Consultation:** Engaging with residents, families, and advocacy groups throughout the planning and implementation process is crucial to ensuring that the needs and preferences of the community are taken into account. By soliciting feedback and input from diverse stakeholders, we can create play parks that reflect the values and priorities of our community.
4. **Timely Implementation:** Setting a deadline of December 2026 for the completion of all-inclusive play parks in Gloucester provides a clear timeline for action and accountability. This deadline will drive progress and ensure that the necessary resources and support are allocated to achieve our goal of inclusivity within a reasonable timeframe.

To achieve these objectives, I propose the following actions:

1. **Conduct a Needs Assessment:** Initiate a comprehensive needs assessment to identify the existing gaps and barriers to inclusivity in our play parks. This assessment will inform the design and development of all-inclusive play spaces that meet the diverse needs of our community.
2. **Develop Design Guidelines:** Create design guidelines and standards for all-inclusive play parks based on best practices and accessibility principles. These guidelines should prioritize safety, usability, and inclusivity, ensuring that all children can enjoy the benefits of play in a supportive environment.
3. **Allocate Funding and Resources:** Allocate the necessary funding and resources to support the planning, design, and construction of all-inclusive play parks in Gloucester. This may include securing grants, partnerships, and community contributions to supplement the municipal budget and ensure the successful implementation of this motion.
4. **Monitor Progress and Evaluation:** Establish a monitoring and evaluation

framework to track the progress of all-inclusive play park projects and assess their impact on the community. Regular updates and reports to the council and residents will provide transparency and accountability throughout the implementation process.

In conclusion, making all play parks all-inclusive by December 2026 in Gloucester is a crucial step towards creating a more equitable, welcoming, and accessible community for all residents. By prioritising inclusivity in our recreational spaces, we can promote social cohesion, physical well-being, and positive childhood development for children of all abilities. I urge all council members to support this motion and work together to build a more inclusive future for Gloucester.”

2. PROPOSED BY COUNCILLOR A. CHAMBERS

“This Council notes that child and young people exploitation is a serious and growing crime. While the exploitation of children by criminals has, sadly, been happening for a long time, the ways in which it has evolved and the increasing risks to children and young people mean that barely a week goes past without a devastating new story reaching the headlines.

Young children are being drawn into exploitative situations, and while our most vulnerable children, including those who have been excluded from school or are in care, are most at risk, we know that children who are ‘under the radar’ are also now being targeted due to their anonymity with authorities.

The effects of child exploitation can be devastating and have a profound impact on children for the rest of their lives.

Councils have a key role to play in tackling child exploitation head on, from awareness-raising and staff training, to prevention and support for children who have been victims. They cannot do this alone.

City Council close working with partners including the County Council, police, NHS and schools is vital if areas are to have the right systems in place to prevent and disrupt the criminal activity putting children and young people at risk.

Understanding, hearing, and designing services with young people who have been affected by exploitation is essential, as is working with parents and carers. Children and young people are unlikely to see their experience as ‘criminal exploitation’ or ‘sexual exploitation’ and our response needs to consider the holistic needs of the child and their family.

All councillors have responsibilities, as local leaders and community representatives, to help protect children in their area. Being aware of the signs of child exploitation is key, as is understanding what to do if you have concerns and knowing what questions to be asking of local services.

What is child exploitation?

Child exploitation is complex, takes a variety of forms and doesn’t neatly fit into

categories. In general, child exploitation occurs where an individual or group takes advantage of a power imbalance to coerce, control, manipulate or deceive a child or young person under the age of 18 into criminal or sexual activity or modern slavery. This can be in exchange for something the victim needs or wants, this is most likely to be the result of grooming, where a criminal has identified what a young person may want or need.

The power imbalance can be through a range of factors, including age, gender, cognitive ability, status, and access to economic or other resources. A young person may also experience poor mental health, have experienced bereavement or are being bullied which may make them more likely to be vulnerable to exploitation.

The victim may have been exploited even if the activity appears consensual, and exploitation does not always involve physical contact; it can also occur through technology.

All those working with children and young people must be clear that exploitation is never the child's fault, even if some form of exchange has taken place (for example, if the young person has received payment, gifts, a relationship or status in return). All children and young people have a right to be safe and protected from harm.

There are various ways in which children and young people are groomed for exploitation. Many perpetrators are skilled at identifying and targeting vulnerabilities, infiltrating social networks and isolating young people from protective influences. This can include the following:

there are some behavioural changes that children or young people may display. The following may help to identify a child or young person who is being exploited:

LGA states:

- persistently going missing from school or home
- regularly being found out of the home area
- excessive receipt of texts/phone calls
- relationship with controlling / older adults
- leaving home and care without explanation
- suspicion of physical assault / unexplained injuries
- gang association and isolation from peers or social networks
- significant decline in school results and performance
- self-harm or significant changes in emotional wellbeing.
- unexplained acquisition of designer clothes
- unexplained acquisition mobile phone
- Leaving home to have unexplained holidays with controlling adults
- unexplained acquisition of money,

NSPC States:

Groomers gain trust by:

- pretending to be someone they're not, for example saying they are the same age as the child online
- Employing the child or working closely with the child for example a sports venue or club
- offering advice or understanding to the child
- buying the child gifts/ designer clothes
- giving the child attention
- using their professional position to influence the child
- Using a reputation of taking the child on trips, outings or holidays

Effects of child exploitation

The effects of exploitation can be devastating and it may take a child or young person some time to come to terms what has happened to them. It is likely to have a significant impact on their physical health, mental health and wellbeing, educational outcomes and employment prospects and their relationships with family and friends.

Councils have a key role in identifying support as early as possible to help children and young people escape and recover from the exploitation that they have suffered. Family members are also likely to be impacted by their child's experience and councils should consider what support they may need for their own mental health and wellbeing and to rebuild relationships, as well as practical support.

Tackling child and young person exploitation

- This council agrees to commission a report to question the extent of child and young person exploitation which exists in Gloucester. (LGA states that stamping out child exploitation relies on full engagement from all partners at a senior level and elected members should question the extent to which this is the case in their local area).
- Training for all senior managers, elected members and appropriate other officers should include warning signs, how to report concerns, how to safe guard and how to prevent. Training should also include evidence gathering.
- Work with partners to raise awareness for young people and children including the public on how to obtain help and how to report, specifically for areas within this councils responsibility."

3. PROPOSED BY COUNCILLOR A. CHAMBERS

"Nitrous oxide (NOS) gas canisters, commonly used for recreational purposes like inhaling, can pose several dangers if disposed of in normal waste. Here are some of the potential risks:

1. Environmental Impact: NOS canisters contain nitrous oxide, a greenhouse gas that contributes to global warming when released into the atmosphere. Improper disposal in normal waste can lead to the release of nitrous oxide during decomposition, contributing to environmental pollution.

2. Fire Hazard: If NOS canisters are not properly disposed of and end up in landfills or incinerators, there is a risk of fire. The pressurised canisters can explode when exposed to heat, causing fires and endangering waste management workers. This has led to around 8 Fires at Gloucester City Council waste depot where 3 of the fires required emergency services.
3. Health Risks: Inhaling nitrous oxide from improperly disposed of canisters can be harmful to human health. It can cause dizziness, loss of consciousness, and even asphyxiation if not used in a controlled environment.
4. Contamination: NOS canisters may contain residues of nitrous oxide and other substances used in manufacturing or processing. When disposed of in normal waste, these residues can contaminate soil, water sources, and the surrounding environment.
5. Safety Risks for Waste Handlers: Waste management workers who handle normal waste may unknowingly come into contact with NOS canisters, risking injury from explosions or leakage of gas.
6. Legal Consequences: Improper disposal of hazardous materials like NOS canisters can lead to legal repercussions. Breaking waste disposal regulations can result in fines, penalties, and legal actions.

To mitigate these dangers, it is essential to handle and dispose of NOS gas canisters properly. Setting up a dedicated collection point for NOS canisters, as mentioned earlier, can help ensure safe and environmentally friendly disposal practices.

To create a collection point for nos gas canisters, Gloucester City Council can follow these steps:

1. Location Selection: Gloucester City Council will chose suitable locations around Gloucester City for the collection points. These collection points will be in canister hot spots. The collection point will be easily accessible to the public and have enough space to accommodate the collection of canisters.
2. Regulations and Permits: Gloucester City Council will check associated laws and regulations regarding the collection and disposal of gas canisters. The city council will obtain any necessary permits or permissions required to set up a collection point.
3. Safety Precautions: Gloucester City Council will ensure that the collection point is set up in a safe manner. Implement safety measures to prevent any accidents or mishaps.
4. Collection Bins: Gloucester City Council will provide designated collection bins or containers for the gas canisters. Making sure the bins are clearly labeled and secure to prevent any leaks or spills.
5. Information Signage: Gloucester City Council will display information signs at

the collection point detailing the accepted types of gas canisters, safety instructions, and contact information for any queries.

6. Collection Schedule: Gloucester City Council will establish a regular collection schedule for the canisters. Coordinate with a waste management company or recycling center for proper disposal.
7. Promotion and Awareness: Gloucester City Council will promote the collection point to the community through various channels such as social media, local newspapers, and community events. Raise awareness about the importance of proper disposal of gas canisters.

By following these steps, Gloucester City Council will create an effective and safe collection point for nos gas canisters in Gloucester City.

This council resolves to:

- Fit at least 6 designated Nos Canister collection bins/drop off bins for the safe collection of the associated canisters around Gloucester City.
- To dispose of the Nos Canisters in a safe and legal manner.
- To provide these collection points with the aim of reducing fires at the council waste depot and with a view of reducing the likelihood of future fires.
- To advertise the locations to Gloucester City residents of these collection/drop off bins and their locations.”

4. PROPOSED BY COUNCILLOR MORGAN

“This Council condemns all aggressive or threatening behaviour to any person, in any form and anywhere. This includes, but is not exclusive to, the Russian invasion of Ukraine, the conflict in Gaza and closer to home at Parliament and in other venues for democracy such as this Chamber.

We further condemn the hatred and intolerance which is spread via social media by individuals and at any public places which is resulting in the need for increasing security measures to reassure and protect those affected.

This Council requires that all councillors elected in May 2024 are to be provided with training on the use of social media and how to combat intimidation. All councillors are to be given a protocol on how to report threatening behaviour etc. Furthermore, the Leader of the Council is asked to write to our M.P. Richard Graham and the L.G.A. to register our concerns.”

5. PROPOSED BY COUNCILLOR PULLEN

“This Council welcomes the Climate Change Strategy and Action Plan following the declaration of a climate emergency in 2019.

This council further welcomes the commitment towards reaching nett zero emissions in its own functions by 2030 and across the wider city district by 2045.

The Climate Change Emergency and subsequent Climate Change Action Plan is

the most significant issue facing Gloucester in generations. It is therefore vital that every resident in the city is fully aware of the Action Plan and is consulted on its recommendations and implications”.

This council therefore resolves:

1. To carry out a full and thorough consultation process in a range of styles and processes that enables every Gloucester resident to have their say on the recommendations in the Climate Change Action Plan.
2. In addition to the consultation processes already agreed and to ensure that every resident is aware of the action plan, this council writes a physical letter to every household in the city informing them of the Climate Change Action Plan.
3. The letter will also inform residents of how to express their views and opinions on the contents of the plan and how they can take part in the consultation.”

6. PROPOSED BY COUNCILLOR CHAMBERS-DUBUS

“The use of IT and digital technology is a quick and efficient method for the council to interact with the public. Many residents find it easy and convenient to email the council, visit the council website and access council services using IT.

However, there are still significant numbers of people who do not have access to IT or who own a laptop, iPad or mobile phone. Likewise, there are many people who do not have the skills or confidence to use IT effectively. Elderly people, people with disabilities and those with specific needs are therefore often digitally excluded from contacting the council and accessing council services.

As the council continues on its journey of digital transformation it is therefore vital that there are still adequate communication processes for people who do not have access to or who are unable to use IT”.

This council therefore resolves:

1. Not to rely entirely on IT as its only means of communication with residents.
2. To recognise that not everyone has access to IT or is IT literate and that some people are digitally excluded from accessing council services.
3. To put greater emphasis on contacting the council using traditional methods such as by telephone, writing a letter or by visiting the council in person.
4. To be sympathetic and provide help and support to people who cannot use IT and are digitally excluded.
5. To provide a range of effective and accessible opportunities to ensure that everyone has access to council services and never relies entirely on IT as the only means of communication.”

7. PROPOSED BY COUNCILLOR DEE

“This council notes:

- The health and well-being of Gloucester’s residents is at the heart of everything we do (City Council Plan Priority 2022-2024).
- We acknowledge the changes in current society are affecting childhood experiences; opportunities for outdoor play are diminishing, leading to more sedentary lifestyles.
- The benefits and importance of outdoor play for young children’s healthy growth. Providing spaces for children to explore outdoors fosters better childhood experiences such as problem solving, socialising, playing co-operatively, facing adventures and challenges without being constantly engaged in activities controlled by adults.
- Play areas are an essential community asset benefitting families across the city.

This council therefore resolves to:

- Re- affirm our commitment to provide outdoor play areas in the city.
- Establish a comprehensive city-wide play strategy and make it a Council Plan priority to do so.
- Continue to improve and expand outdoor play opportunities for all children, by creating large, well-equipped, and accessible outdoor play areas in Gloucester.

Consult with children, hear their preferences and ideas; creating play spaces that meet their needs and reflect their wishes. As such the strategy should incorporate mechanisms for engaging with children and their families as part of any decision-making process.”

8. PROPOSED BY COUNCILLOR FIELD

“This council expresses deep concern about the state of many roads and footways in the city of Gloucester. They are riddled with potholes or crumbling to bits.

This council notes that Conservative run Gloucestershire County Council is responsible for the maintenance of the highway network in Gloucester.

This council agrees that it should lobby robustly Gloucestershire County Council to improve the condition of Gloucester’s roads and footways to a level acceptable to this council and the residents of this historic city.”

9. PROPOSED BY COUNCILLOR PADILLA

“The development of an Equality, Diversity and Inclusion (EDI) Strategy within our city remains a priority after recommendations from the LGA Peer Review Panel last year.

Hence this Motion revisits the development and implementation of an Equality, Diversity and Inclusion Strategy for our city. This will demonstrate our dedication to cultivating a community that thrives on diversity, encourages equal opportunities, and ensures inclusivity for all residents. It also aligns with the values of fairness, justice, and unity. This will be a comprehensive and inclusive strategy that encompasses the diverse range of protected characteristics – age, race, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, sex, sexual orientation, and of course disability.

Whereas, by engaging with a diverse range of community stakeholders, we seek to gather insights, perspectives, and expertise that will inform the development and implementation of inclusive policies. This approach will ensure that the strategy addresses the unique needs and concerns of various groups within our community.

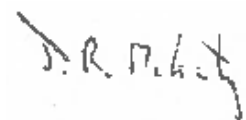
Whereas, there is a strong need to remove barriers to participation, provide accessible environments, and foster a culture that values and respects the differences among our residents.

Whereas, following its approval, regular assessments will be conducted to evaluate the effectiveness of implemented policies, identify areas for improvement, and measure progress towards our overarching goal of creating an inclusive and equitable community.

Therefore, be it resolved, the City Council:

1. Acknowledges the importance of expediting the development and implementation of an Equality, Diversity, and Inclusion Strategy.
2. Resolves to prioritise the allocation of resources, streamline decision-making processes, and provide clear directives to expedite the completion of the EDI Strategy.
3. Affirms its unwavering commitment to fostering a community where every residents feels valued, respected, and included.
4. Calls upon relevant stakeholders to actively participate in the development and implementation of the EDI Strategy, ensuring that diverse perspectives are incorporated into the framework.
5. Directs relevant departments and committees to report back within 3 months with progress updates on the development of the EDI Strategy.”

Yours sincerely



Jon McGinty
Managing Director

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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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Recording of meetings

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

FIRE / EMERGENCY EVACUATION PROCEDURE

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

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

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COUNCIL

MEETING : Thursday, 22nd February 2024

PRESENT : Cllrs. Williams (Mayor), Hudson (Sheriff & Deputy Mayor), Cook, Norman, S. Chambers, Lewis, Padilla, Hilton, Chambers-Dubus, Gravells MBE, Tracey, Morgan, Wilson, Bhaimia, D. Brown, Taylor, Field, Patel, Toleman, Pullen, J. Brown, Hyman, Bowkett, Ackroyd, Castle, A. Chambers, Conder, Dee, Evans, Kubaszczyk, O'Donnell, Radley, Zaman, Sawyer, Campbell and Trimnell

Others in Attendance

Managing Director
Monitoring Officer
Director of Communities
Head of Finance and Resources
Head of Place
Policy and Governance Manager
Democratic and Electoral Services Officer

APOLOGIES : Cllrs. Brooker and Durdey

71. MINUTES

RESOLVED:- That the minutes of the meeting held on 25th January 2024 were approved and signed by the Mayor as a correct record.

72. DECLARATIONS OF INTEREST

There were no declarations of interest.

73. PUBLIC QUESTION TIME (15 MINUTES)

73.1 In respect of question 1, Mr Redgewell asked whether any heavy maintenance required at Gloucester Transport Hub, such as roof repairs or maintenance associated with the stained-glass window would be covered by the £66k operational budget. The Leader of the Council, Councillor Richard Cook, advised that the operational budget was for general day to day maintenance and that the stained-glass window was covered by capital budget.

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73.2 In respect of question 2, Mr Redgewell asked what marketing plans the Council had in relation to the Transport Hub café and whether there was a ringfenced budget to allow for this. Councillor Cook confirmed that any marketing would be covered by a marketing budget and would not be part of the general budget.

73.3 In respect of question 3, Mr Redgewell asked whether the income generated from the public toilets in the Gloucester Transport Hub was ringfenced for bus station upkeep. Councillor Cook advised that the income from the toilets was not ringfenced and went into the Council's general fund.

74. PETITIONS AND DEPUTATIONS (15 MINUTES)

There were no petitions nor deputations.

75. ANNOUNCEMENTS

The Mayor

The Mayor reminded Members that the Civic Charity Ball was due to take place on 6th April 2024, and confirmed that further details would be circulated in due course. She further advised that the Civic Service would be held on 27th April 2024 and that she hoped as many Councillors as possible would be available to attend.

Managing Director

The Managing Director advised Members that the Head of Culture and Leisure would shortly be leaving the Council. He noted his thanks to the Head of Culture and Leisure and appreciation for his work. The Cabinet Member for Culture and Leisure also paid tribute to the Head of Culture and Leisure, noting that the city had directly benefited from his input and that he would be greatly missed.

76. FINAL BUDGET PROPOSALS (INCLUDING MONEY PLAN AND CAPITAL PROGRAMME)

76.1 Councillor Cook moved the motion as set out in the Final Budget Proposals 2024/25 and spoke in their support. He paid tribute to Cabinet Members, particularly the Cabinet Member for Performance and Resources, for their work on the budget, and thanked senior Officers, specifically the Head of Finance and Resources, for their input and for formulating the proposals. Councillor Cook also thanked Council staff for their commitment to the authority.

76.2 Councillor Cook noted that amendments had been tabled and confirmed that some had been accepted by the administration. He stated that 2023 had been memorably difficult due to the former Aspire Leisure Trust entering administration and the work which needed to be undertaken to restore Leisure Services following their closure. Councillor Cook further highlighted national issues which has put pressure on the Council's finances, including the need to procure more temporary accommodation and inflationary

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pressures which made any plans and projects more expensive to deliver, noting that pressures had also made it more difficult for the Council to replace staff.

- 76.3 Councillor Cook highlighted some of the major achievements across portfolios over the past year. He noted that the Property Investment Strategy had enabled the Council to deliver on Council Plan priorities. He referred to the acquisition of St Oswalds and the £2.2m Brownfield Land Remediation Grant which had enabled work to start on the mixed housing scheme which would include social and affordable homes, noting that the exchange of contracts with Rooftop had taken place.
- 76.4 It was noted that the High Street Heritage Action Zone had received considerable praise and that further planned work included planters and additional seating in the Cathedral Quarter. Councillor Cook advised that a new exit from the car park onto Metz way had been completed, and that work was ongoing to improve car park facilities to the front of Gloucester train station, underpass and other areas of the station. He further confirmed that the Barbican site development had concluded and had been occupied since December 2023, and that the Food Dock had been completed with new businesses occupying the various spaces.
- 76.5 Councillor Cook highlighted that the Kings Square development had seen its second-year anniversary and that in Kings Quarter, all bar one of the 19 Whitefriars apartments had been sold. He also advised Members that completion of the Forum development was expected later in the year and had already reached 70% occupancy. Councillor Cook further advised that the Council had received strong interest in occupying the former Chambers pub, and that Putt Putt Noodle would shortly be occupying the former Primark building. In respect of the former Debenhams building, Councillor Cook advised that work had been ongoing for the past 18 months with an anticipated completion of September 2024.
- 76.6 Members were advised that the Council had received £11m in Levelling Up Funding which was due to be used to develop the Garden Quarter around Greyfriars and the Eastgate Market.
- 76.7 Councillor Cook commended Ubico and their staff for their work in delivering waste and recycling services for Gloucester, noting that the value of recyclables had reached £550k, compared with £350k achieved 4 years ago.
- 76.8 In respect of savings, Councillor Cook noted that the planned relocation of the Council's face to face Housing and Customer Services from the Gateway to the Eastgate Management Offices was expected to generate savings of £85k.
- 76.9 In other portfolio areas, Councillor Cook confirmed that the Culture team had successfully applied for funding for repairs and improvements to Gloucester Guildhall, and that the Gloucester Culture Trust had been granted National Portfolio (NPO) status. Referring to events in the city, he praised the success of Gloucester Goes Retro, which had generated footfall figures of 27k in the

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Eastgate Shopping Centre, and the Lantern Parade for Christmas. In respect of Aspire Leisure Trust, it was noted that Officers and the Cabinet Member for Culture and Leisure had responded instantly to address the closure of Leisure facilities and that the new interim provider, Freedom Leisure, had already made improvements to the offering.

- 76.10 With regard to the Planning and Housing portfolio, Councillor Cook reminded Members that the Council had made available £5m to enable a temporary accommodation acquisition programme to reduce reliance on expensive temporary homelessness options. He confirmed that 7 properties had progressed towards purchase, with an estimated saving of £100k per year. Councillor Cook advised that the Council continued to work with registered housing providers to increase housing in the city, and that 1,354 new homes had been delivered over 2022/23 with 417 of these being affordable homes.
- 76.11 In the Communities and Neighbourhoods portfolio, Councillor Cook advised that there had been considerable activity, with the Council continuing to roll out the warm spaces grant. He noted that the Community Wellbeing Team continued to monitor additional funding opportunities to support local delivery partners, and that the team continued to work closely with the Stronger Safer Gloucester partnership. He advised that the city had achieved its 6th consecutive Purple Flag accolade and that the Community Wellbeing Team continued to support children and their families with access to free meals.
- 76.12 Councillor Cook reflected on the Council Plan priorities and objectives, which focused on inequalities and climate change, and noted that the draft Climate Change Strategy would be put out for public consultation prior to adoption.
- 76.13 In respect of the budget, Councillor Cook advised Members that over the past ten years, cumulative savings of £5.5m had been achieved by the Council. He advised that the administration was proposing a Council Tax increase of 2.99% and noted that the 2024/25 budget included both revenue and capital programme, which included the budgeted delivery of Greyfriars and Kings Quarter developments. Councillor Cook stated that in recognition of risks, the administration needed to ensure the Council finances were secure, and that it further recognised the importance of maintaining reserves. Councillor Cook referred to comments made by the Peer Review team following their review in November 2023 regarding legacy risks of the Forum development and cyber incident, and their belief that the Council would benefit from being prudent in spending. It was his belief that the budget proposals illustrated that the administration was ambitious but prudent.
- 76.14 Councillor Norman seconded the motion and outlined further detailed points about the budget proposals. She stated that local government finance continued to have a tough financial outlook with inflationary pressures impacting businesses, residents and local authorities. She noted that the budget and money plan had therefore been generated with prudent principles, using the best assumption on future central government changes to Business Rates baselines, New Homes Bonus and the impact of a future Fair Funding review.

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- 76.15 Councillor Norman outlined the support received by central government for Gloucester for the upcoming financial year, which included £17k increase in Revenue Support Grant and an additional year of New Homes Bonus allocation equating to £811k.
- 76.16 Councillor Norman advised Members that the impact of inflation had caused several cost pressures within the Council's budget which had resulted in the Council having to find further efficiencies or additional income, however she impressed that the Council was in a better position than many second-tier authorities.
- 76.17 With regards to the Performance and Resources portfolio, Councillor Norman advised that the following cost saving initiatives and income streams had been identified for the coming year:
- £85k saving from the relocation of the Customer Service and Housing services to Eastgate for face-to-face appointments,
 - In-sourcing of parking enforcement aiming to deliver £25k
 - Offering direct cremations aiming to deliver £50k per annum in income.
- 76.18 Councillor Norman noted that Council Tax could now increase by 2.99% for second-tier authorities and it has therefore been assumed annually within the Money Plan. She further noted that just 3 districts in the country had not planned on increasing Council Tax by the maximum amount. In practice, Councillor Norman advised that a band D household would now pay 61p per day for Council services.
- 76.19 Members were advised that the Council had limited Earmarked Reserves with the balance on 31st March 2024 being £4.266m. Councillor Norman confirmed that where earmarked reserves were not ringfenced for a specific use, they could potentially be used to support the General Fund which would, during the life span of the Money Plan, increase from £500k to £1.736m by 28/29, to reach a target of 10% of the Council's revenue budget.
- 76.20 Councillor Norman referred to the Council's budget consultation which had taken place between November 2023 – January 2024. She advised that 147 responses had been received, and that the top five priorities included:
- Street cleaning and litter collections
 - Waste collections and recycling
 - Parks, play areas and open spaces
 - Land drainage and flood protection
 - Homelessness and housing.
- 76.21 In concluding, Councillor Norman paid tribute to Officers within the Finance team and the Council as a whole in supporting the preparation of the budget. She particularly thanked the Head of Finance and Resources for leading on the generation of the budget.

Amendments

76.22 The following amendments were agreed by the administration and Group Leaders in advance of the meeting:

Liberal Democrat Group and Labour Group proposal to remove the proposed increase to charges for bulky waste collections at a cost of £3,500.

Agreed Action

The Money Plan has been amended to reduce income inflation line, removing the £3,500 expected additional income from the proposed £1 increase to the Bulky Waste Fee, this reduces the transfer to the General Fund by £3,500 (see revised Appendix 1) and the Fees and Charges Book has been revised (see revised Appendix 6 extract).

Labour Group proposal to introduce a publicity and promotion poster campaign to create public awareness of the financial support and benefits the council offers to people struggling with increasing Cost of Living expenses at an estimated cost of £5,000.

Agreed Action

The Money Plan has been amended, adding a new base budget pressure of £5,000 and reducing the transfer of funds to the General Fund by £5,000 (see revised Appendix 1 and Appendix 2).

76.23 Councillor Hilton moved and Councillor Wilson seconded the following amendments:

Amendment 1 – Garden Waste Collections 11 months per year

Improve the garden waste collection service by operating it 11 months a year rather than 10 months a year – additional cost £35,000 per annum.

Amendment 2 – Tree Watering

Establish a reserve of £25,000 to cover the cost of hiring a water bowser and staff over a 12-week period during the summer, if required, to water young trees on council land during hot dry periods.

Amendment 3 – Graffiti Removal Fund

Establish a £20,000 reserve for the removal of graffiti from prominent places across the city.

Amendments 1 to 3 (including the accepted amendment) annual cost £83,500 to be funded by

£41,000 additional central government grant within the final LG settlement.

£42,500 to come from the £900,000 environmental insurance reserve.

Amendment 4 – Water Refills

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Create an initial budget of £15,000 for the delivery of at least 3 water bottle refill units at public locations in central Gloucester starting with Kings Square. Funded by creating a capital budget from future capital receipts.

- 76.24 Councillor Hilton introduced the amendments. He noted that he was disappointed by the budget and commented that despite regeneration projects supported by various government grants, there were no plans to improve services. He noted that although he was supportive of the Forum development, it potentially remained a risk to the finances of the Council and further expressed the view that increasing Council Tax by 3% and fees and charges by 6% was excessive during the current cost of living crisis.
- 76.25 Councillor Hilton was concerned that the Council was placing too much focus on withdrawing from its balances and reserves, and noted that the current outturn predicted a £570k overspend in Q3 of 2023/24. He stated that the Council currently employed around 180 staff compared to 450 previously and raised concerns about Members needing to chase Officers due to heavy workloads. He noted that the Council currently had one Officer responsible for overseeing planning enforcement cases and further highlighted that the New Homes Bonus was not expected to exist in the following year.
- 76.26 In respect of other portfolio areas, Councillor Hilton raised concerns about litter bin shortages and the condition of the parks and open spaces in the city, commenting that the Council over-relied on volunteers rather than directly employing gardeners to upkeep green spaces.
- 76.27 With regard to the amendments, Councillor Hilton noted that he was pleased that the amendment pertaining to bulky waste had been accepted. He outlined and put forward his case for the remaining amendments, noting that garden waste collections for 10 months rather than 11 had caused annoyance to residents who had paid for the service.
- 76.28 Councillor Hilton reinforced his support for the proposed amendment to establish a reserve of £25k to support the watering of young trees during periods of hot dry weather, to avoid a former incident where young trees had perished as a result of extreme weather. Referring to the proposal for a Graffiti Removal Fund, Councillor Hilton impressed the need to tackle the issue as well as the full review recently agreed by Council and outlined his proposals for a water refill scheme. He concluded by outlining how his Members proposed to fund what they felt were modest amendments to the budget.
- 76.20 Councillor Cook responded to each of the amendments, noting that the Council had reduced garden waste collections 2 years ago following a budget consultation where the respondents had been supportive of the reduction. He noted that he had received few complaints around the matter and garden waste collections during the winter months had an adverse impact on the environment if large refuse vehicles were collecting minimal loads.
- 76.21 Councillor Cook advised Members that Gloucestershire County Council had already offered its assistance to the Woodland Trust in respect of tree

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watering, and that the motion passed by Council in January regarding graffiti had not yet reported back. He felt it was possible that the Council might be able to generate income depending on the results, by offering to clear graffiti on private residences at a cost, and it was noted that Ubico were already contracted to clear graffiti on Council owned property.

76.22 Councillor Cook stated that the water refill amendment had been raised the previous year and confirmed that a refill app showed that 80 organisations within 1 mile of Kings Square already offered a refill scheme.

76.23 Councillor A. Chambers noted his support for the water refill amendment and commented that it might particularly help vulnerable and homeless people stay hydrated. He noted that visitors may not be aware of the refill app and expressed the view that refill fountains would deliver a public health benefit for the city.

76.24 Councillor Lewis supported the budget proposals in their current form, noting his view that the current administration had been prudent in spending and as a result, the Council was financially viable and had delivered a balanced budget.

76.25 Councillor Chambers-Dubus noted her agreement that garden waste collections for 10 months of the year was not sufficient, and stated that residents living on tree lined streets faced particular challenges. She commented that cuts to regular street cleaning had made it more necessary to restore extra garden waste collection.

76.26 Councillor Patel noted that the proposal for water refill stations had already been debated at previous budget meetings. In respect of tree lined streets and street cleaning, he suggested that Members be proactive in reporting issues to the Council's Here to Help facility so that Officers could pass information relating to problem areas onto Ubico.

76.27 Councillor Wilson confirmed that garden waste was a significant issue in Hucclecote and reflected on residents' experiences. He also noted that in the current year, due to a quirk in dates the period of time between garden waste collections had fallen closer to 3 months than the expected 2. Councillor Wilson stated that he could not see why the water refill amendment could not be accepted, noting his view that £15k out of capital was a modest amount and that Kings Square would be an ideal location for the refill station. He noted that not all visitors would be aware of the refill app, and that some might feel embarrassed about entering shops to request a refill. Councillor Wilson further suggested that Severn Trent might be interested in assisting with the scheme.

76.28 In respect of the amendment relating to garden waste collections, Councillor Morgan highlighted that an environmentally beneficial option might be to compost any surplus leaves. He further noted that residents also had the option of recycling extra garden waste at the Hempsted Recycling centre.

76.29 Each amendment was put to the vote and all were lost.

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76.30 Councillor Pullen moved and Councillor Chamber-Dubus seconded the following amendments:

1. Remove the proposed charge for replacement Wheelie Bins.

Cost: £55,000.00

2. Obtain a suitable software package to enable the council to identify, target and offer financial support and benefits to people most in need and struggling with increasing Cost of Living expenses.

Cost: £20,000.00

Total cost of Amendments

(including the accepted amendments):

£83,500.00

Funded by:

1.Extra Funding from Local Government Settlement

£41,000.00

2.Transfer from Reserves

£42,500.00

£83,500.00

76.31 Councillor Pullen introduced his amendments and responded to the budget proposals. He stated that the Council had overspent by £680k and was facing a budget cut of £300k, which in his view meant that the Council was not financially viable.

76.32 Councillor Pullen noted that central government funding for the Council totaled £6.2m in 2015/16 and currently stood at £4.3m in 2023/24, which amounted to a significant cut in central government funding. He further highlighted that in 2014/15, Council Tax was raised by £6.4m and had this year raised by £9.1m, commenting that this showed that lack of funding from central government had forced the Council to increase Council Tax.

76.33 Councillor Pullen outlined his concerns about inefficiencies, including £500k spending on consultants and the disposal of the HKP Warehouses for £2m rather than the £3m market value. He further noted that Members had raised concerns about Aspire during the previous budget Council.

76.34 Councillor Pullen expressed the view that a failure in the budget pertained to the Housing and Homelessness budget. He stated that the cost-of-living crisis had resulted in a significant increase in the number of people losing their homes, and highlighted that there were currently 395 homeless cases in city, which was a rise of 62 from the previous year. Councillor Pullen further stated that there were currently 4814 people on the housing waiting list. In respect of the temporary accommodation acquisition programme which had been adopted by the Cabinet this year, Councillor Pullen asserted that this idea had been put forward by Labour Group back in 2019, as well as proposals for a Homeless Prevention Fund in 2022.

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- 76.35 Councillor Pullen further queried how the relocation of the Gateway would generate £85k in savings when the Council already owned both buildings.
- 76.36 In respect of the Labour Group amendments, Councillor Pullen noted that he was pleased that the amendment pertaining to bulky waste had been accepted, however he raised concerns about charging residents for lost wheelie bins where the loss was not down to the fault of residents.
- 76.37 Councillor Pullen thanked the Head of Finance and Resources and his team for their advice and assistance, and outlined what he felt were modest amendments to the budget,
- 76.38 Councillor Chambers-Dubus seconded the amendments. She noted that the Group had provided warnings about the Aspire Leisure Trust and the housing crisis in previous years, and that as interest rates increased, residents were getting less for their money. Councillor Chambers-Dubus expressed the view that funding cuts from central government meant that the Council could not fulfil its obligations.
- 76.39 Councillor Norman responded to the amendments, noting that Cabinet did not currently feel they could commit to the amendment from the Labour Group pertaining to the software package. She stated that she needed to understand more about the software, how it would work in practice and any implications of rolling it out. Councillor Norman noted that Officers were aware of a company which could potentially provide the software to enable to identify, target and offer financial support to residents who needed it, and that they would be willing to meet with them to ascertain whether this was the right thing for the Council to pursue. She noted that the longer-term costs and any ongoing revenue implications needed to be looked at in further detail, as well as any implications on staffing resources at the Council as the company who provided the software had highlighted that it could achieve administrative savings.
- 76.40 In respect of comments about the relocation of the Customer Services and Housing teams, Councillor Norman noted that the Gateway office had a larger square footage and that a comprehensive report regarding the proposals had previously been approved by Cabinet, which was at the time, open to be considered by the Overview and Scrutiny Committee.
- 76.41 Reflecting on the amendment pertaining to wheelie bins, Councillor Cook noted that a recent waste audit in Kingsway had shown that a street of 26 houses had 41 wheelie bins between them, and that the Council was keen to avoid waste in this respect and prevent abuse of the system.
- 76.42 Councillor O'Donnell raised concerns regarding the Review of Members' Allowances report which was considered by Council on 17 January.
- 76.43 Councillor A. Chambers noted that the proposal to obtain a software package to help target financial support to struggling residents could well save Officer time and assist residents who struggle with IT.

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- 76.44 Councillor S. Chambers responded to comments regarding the acquisition of temporary accommodation. She noted that in 2019, there were 19 households in temporary accommodation, and that to purchase temporary accommodation in the same scale back then would have resulted in wasted cost. It was her view that the Council had acted quickly to adapt to challenges brought on by the cost-of-living crisis and rising interest rates, and that other districts had commented on how quickly the Council had acted in this regard. She stated that the administration had overseen the building of a record number of homes, the highest since records began, and that the long-term focus needed to be on providing good quality homes.
- 76.45 In respect of comments around the Aspire Leisure Trust, Councillor Patel asserted that it was positive that the administration and local MP had worked together and that the Council had reopened facilities quickly following the initial closure.
- 76.46 Councilor Pullen summarised the debate. Each amendment was put to a vote and all were lost.
- 76.45 Councillor A. Chambers proposed and Councillor O'Donnell seconded the following amendment:

Based on the General Fund Summary 2024-2025 the council will be in arrears of £7,150.00.

The City Council has already looked to take the VAT Shelter funding for earmarked reserves and raid the full balance of the earmarked reserves.

Earmarked reserves is a budget equalisation – This reserve was established to provide a buffer with which to deal with the uncertainties in the forward financial planning.

It is proposed to utilise this reserve in 2023/24 to contribute towards the significant cost pressures the Council has seen this year, such as from temporary housing and inflationary pressures. This earmarked reserve was set up for this purpose and will reduce the annual impact on the overall General Fund position of the Council.

Therefore, the city council is already forecast to operate at a loss, and has no buffer left to facilitate any unidentified significant cost pressures.

Therefore it is imperative that the council is financially well and spending tax payers money correctly. If a private business was trading at a loss they have a legal responsibility to close the business.

Statutory Services are struggling and these are legally required by law.

Culture is not a statutory requirement and therefore needs to be addressed as such.

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Below is a breakdown of BlackFriars and Guildhall showing the sites separately, each site is operating at a significant loss to the tax payer.

Culture portfolio is costing the Gloucester Tax Payer £2,229,641.00 loss each year.

Blackfriars and Guildhall are set to continue to make losses based on their cash for the next 2 years.

Private cinema, bar and wedding venues when operated as a private business establishment are financially successful, employing people, generating a profit and servicing the community. My motion is for the City Council to sublet these premises to private businesses so that a profit can be generated for the business, they can be ran successfully by a private director and the premises can be fully maximised for the community. Furthermore, rental sublets for similar premises are around Guildhall £50,000- £65,000.00 per annum and Blackfriars Wedding Venue £35,000.00 - £40,000.00 per annum. This will therefore generate an income to the Gloucester Tax Payer of circa £85,000.00 to £105,000.00 per annum.

Furthermore, the deficit of the Guildhall & Blackfriars Wedding Venue costs the Gloucester Tax payer £459,830.00 a year in lost Tax payers money. It has continually made significant losses year on year and has not been able to at least break even.

Therefore, the total cost for the Gloucester Tax Payer for the Guild Hall & Blackfriars is £564,830.12

This money should be invested in emergency accommodation. Currently the city council is forecast to lose £1,577,300.00 on premises costs to support emergency accommodation such as hotels costs etc, which Government grants cover in some cases 10%- 20% of these costs.

Currently emergency housing costs to hotels in some circumstances cost the Gloucester tax payer £200.00 - £240.00 per night. 365 days in a year at £240.00 is £87,600.00 for one individual.

Therefore, 10 x individuals at £87,600.00 per year is a cost to the Gloucester Tax Payer of £876,000.00 per year. Therefore saving £477,230.12 to the Gloucester Tax Payer per year and on going savings per year of £876,000.00

Year On Year Saving

Year 1 = £876,000.00 – Minus cost of 10 x New build pods = £564,830.12 = £477,230.12

Year 2 = £876,000.00

Year 3.4.5.6.7.8.9.10 = £876,000.00 per annum

Year 10 SAVINGS OF £8,195,169.80 at a 10 year period.

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Furthermore, Gloucester City Council can purchase more pods with the generated saved income, and the on going saving of not facilitating the financially failing Guild hall & Blackfriars, while generating a on going lease income from these units while they remain functioning for the community.

Moreover to saving £8,195,169.80 over a 10 year period. Gloucester City Council will own outright a minimum of 10 x new build pods which are carbon neutral and are A+ EPC rated.

- 76.46 Councillor A. Chambers spoke in support of his amendments. He paid tribute to the Head of Finance and Resources and the Finance team for their work in preparing the budget and supporting Members with their questions on the proposals. He also thanked Councillor Norman as the responsible Cabinet Member overseeing the budget and for being available to answer questions from Members.
- 76.47 Councillor A. Chambers expressed the view that the Council had raided its VAT Shelter to fund the Forum project, and earmarked reserves for budget equalization. He felt that reserves should be used as a buffer for forward financial planning. Councillor A. Chambers further raised concerns around the figures contained in the General Fund Summary 2023/24 pertaining to the Communities and Culture portfolios. He noted that Culture was not a statutory service and expressed the view that there were other services which would benefit from more general fund budget, such as housing, parks, waste collection and businesses.
- 76.48 Councillor A. Chambers proposed that the Council consider subletting cultural venues, such as the Guildhall and Blackfriars Priory to a specialist business with a view of them running the facilities on the Council's behalf. He expressed the view that the Council was facilitating services it had no obligation to run and stated that more investment should be given to areas such as housing.
- 76.49 Councillor Lewis stated that culture was important for the vibrancy of the city. He advised Members that the Council had received advice from the specialist SLC consultancy confirming that cultural services were better off remaining in-house. He stated his view that the Guildhall was the best venue for comedy and live music in the city, which was used by thousands of people per week. Councillor Lewis further noted that the Council had received £500k in support from the Arts Council to invest in its cultural venues, which would not have been a possibility if cultural services was outsourced. He further advised that the Council had had a further £1m in funding guaranteed from the Arts Council.
- 76.50 Councillor Lewis expressed the view that Blackfriars Priory was the jewel in the crown for Gloucester and reflected on the awards the venue had won. He advised that the venue was currently performing well above predictions and that it was the expectation that Blackfriars would generate profit in 3-4 years' time. He concluded by stating that cutting culture was short-sighted.
- 76.51 Councillor Norman confirmed that the administration could not support the budget amendment from a financial perspective. She noted that when the

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Council had previously considered the option of outsourcing the Guildhall, high subsidies would be requested from the authority which suggested that it would not deliver savings as the amendment suggested.

- 76.52 In respect of comments around the provision of temporary accommodation, she confirmed that the current forecast spend as of December 2023 was £1.356m, which was £616k higher than the allocated budget. Councillor Norman impressed that as a statutory service, the Council needed to respond to this demand and the increased costs associated with temporary accommodation were a national trend. She referred Members to the recently agreed temporary accommodation acquisition programme which was intended to support a reduction in the Council's temporary accommodation costs in the 24/25 financial year and beyond and advised that the Cabinet Member for Planning and Housing Strategy was already actively working on the installation of Pods in Gloucester which need to adhere to the relevant planning requirements.
- 76.53 In relation to the suggestion of transferring staff to another organisation, Councillor Norman noted her view that it would be remiss to agree to an unsettling time for Council staff with 48 hours' notice, and with no business case to support the amendment.
- 76.54 Councillor Wilson noted his agreement and highlighted that the £2.2m in savings also included provision for the Museum of Gloucester, Leisure Services and Shopmobility. He further observed in relation to the Pods suggestion that there was no detail in the amendment on costs, maintenance and land insurance, or the issue of planning permission and road infrastructure considerations. He expressed the view that Pods were a good idea, however more detailed analysis was needed.
- 76.55 Councillor Morgan spoke in opposition to the amendment and stated that the Gloucester's cultural heritage was a significant part of the city's value. He reflected on his experience as the former Cabinet Member for Culture and assured Members that budget monitoring was a constant element of the role, with all efforts made to reduce costs to the city. Councillor Morgan felt it was insulting to Officers, who worked hard to maximise income and to give a good service to residents, to demean their work. He expressed the view that the cultural offer was very important in promoting Gloucester as a great place to live, work and visit.
- 76.56 Councillor S. Chambers confirmed that the Council was looking at options around the use of modular Pod accommodation through the capital programme. She further advised that the Council was currently working with partners and local suppliers of Pods, and that the lifespan was equal to traditional builds and environmentally friendly. Councillor S. Chambers stated that although she could not agree to accept the budget amendment on this occasion, she looked forward to further cross-party working further on project.
- 76.57 Councillor Pullen raised concerns about privatising Council services in any sense, noting his view that this generally increased costs and reduced

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access for residents. He impressed that the Council should be trying to make access to culture and leisure as affordable as possible and he therefore could not support the amendment. He agreed that there could be some value in the proposal relating to Pods, however it was his view that this should be used as a last resort if all other options had been exhausted.

76.58 Councillor Chambers-Dubus paid tribute to the staff at the Guildhall and expressed the view that it was a fantastic asset for the city. She also noted that she found the Pods proposal interesting and a potential opportunity, but agreed with earlier sentiments that they should be used as a last resort.

76.59 Councillor O'Donnell shared concerns around the General Fund figures for the cultural portfolio.

76.60 Councillor A. Chambers summarised the debate. The amendment was put to a vote and was lost.

76.61 The budget, as amended, was put to a recorded vote and the votes were as follows:

FOR	AGAINST	ABSTENTION
Williams Hudson Cook Norman Chambers S. Lewis Padilla		Hilton Pullen
Gravells Tracey Morgan		Wilson Bhaimia Brown D
Taylor		Field
Patel Toleman		Brown J. Hyman Bowkett Castle
	Chambers A.	Chambers-Dubus Conder
Dee Evans Kubaszczyk		

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O'Donnell

Radley

Zaman

Sawyer

Campbell

Trimnell

76.62 **RESOLVED that:-**

- 1) the proposals for the 2024/25 budget included in this report be approved.
- 2) it be noted that consultation had been undertaken on budget proposals.

77. COUNCIL TAX SETTING 2024/25

77.1 Councillor Cook moved and Councillor Norman seconded the motion.

77.2 A recorded vote was taken and the votes were as follows:

FOR	AGAINST	ABSTENTION
Williams		
Hudson		
Cook		
Norman		
Chambers S.		
Lewis		
Padilla		
Hilton		
Pullen		
Gravells		
Tracey		
Morgan		
Wilson		
Bhaimia		
Brown D.		
Taylor		
Field		
Patel		
Toleman		
Brown J		
Hyman		
Bowkett		
Ackroyd		
Castle		
	Chambers A.	
Chambers-Dubus		
Conder		
Dee		
Evans		
Kubaszczyk		

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O'Donnell

Radley
Zaman
Sawyer
Campbell

Trimnell

78. NOTICES OF MOTION

78.1 Councillor A. Chambers moved and Councillor O'Donnell seconded the following motion:

“Gloucester City Council notes that parts of the city centre could be described as is looking empty and bland. The city scene is not to the same standard when compared to that of the Gloucester Docks area. And parts of the city centre needs uplifting.

Gloucester City Councils mission is to get more people outside and green the grey in our city. We know adding beautiful planters and softening an urban landscape are great ways to achieve this. They create colourful and welcoming spaces for communities that people want to spend time in and enjoy.

Here are five reasons why improvements should be considered to help the city.

Improved air quality

Did you know plants absorb carbon dioxide and release oxygen into the air? This is the process known as photosynthesis and as humans breathe in oxygen and breathe out carbon dioxide plants do the opposite making the surrounding air quality better. Trees and plants also act as filters for urban pollutants and fine particulates by trapping the nasties in their leaves and bark. That's why the more plants we have in our Gloucester City environment the better, they not only help us breathe better and cleaner air they form an essential part of our surrounding atmosphere.

Good for mental and physical health

Studies have proven that seeing and being close to plants helps reduce anxiety and stress levels in human beings. Gloucester City is dominated by the hospital tower block some older 1960s apartment blocks that don't have any outside space, that can have a negative effect on adults and children including decreased concentration levels and increased psychological stress. Providing planters in Gloucester will help bring people closer to nature, they will create inviting greener spaces and people are more likely to leave their homes, go outside and exercise if there are attractive spaces filled with colourful plants to enjoy.

Sustainable communities

The fact is we all want to contribute to living in a more sustainable world, in cities there are a number of ways we can use plants to contribute to our sustainable development. Rooftop allotments are a great way of growing fruit

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and vegetables in a sustainable way, it has long term environmental benefits; saves money and is much more nutritious than shop bought produce. The community benefits are also greater as urban gardening connects the community together over common sustainable purposes.

Economic benefits

In towns and shopping centres the addition of simple landscaping and planters by businesses can be largely effective in attracting more customers and boosting sales. The addition of plants, flowers and shrubs help to cultivate a positive environment where people can thrive. Greenery can also provide economic benefits to property owners; investing in landscaping can potentially boost property values and attract a wealthier market. Planting can reinforce a sense of identity amongst neighbourhoods providing potential jobs or hobbies for the community. Initiatives like rooftop allotments are a great example of this – they encourage residents to get involved in their communities through allotment rentals all the while providing fresh produce for the locals. City Council to look into a Greener Gloucester City Centre business Competition. Where businesses make the outside of their premises greener with plants and hanging baskets. The mayor will then pick a winner, second place and runner up.

Defining spaces & pedestrian movement

Planters, when used strategically, provide the ability to divide spaces and manage pedestrian movement to aid with meeting social distancing requirements; pathways can be clearly separated from other areas. They can also be used to hide unsightly areas, to act as subtle visual and physical access barriers, or simply to enhance dead space between commercial buildings and roads.

This Council notes that:

- any additional street furniture or planters should be considered in detail, to ensure the correct positioning and funding requirements.
- that the HSHAZ planned public realm works will include 30 planters of varying size, 11 with seating attached and 12 trees being planted in the area, in the first quarter of 2024.

This Council resolves to:

- To look into a Greener Gloucester City Centre business Competition. Where businesses make the outside of their premises greener with plants and hanging baskets. The Mayor will then pick a winner, second place and runner up.
- To look into the feasibility of using several roof top spaces on City Council buildings around the city that are not being used for another purpose for urban allotments.
- To look into the possibility of business sponsorship of any new street furniture in the gate streets, prior to installation.”

78.2 The motion was put to a vote and was carried.

78.3 **RESOLVED that:-**

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“Gloucester City Council notes that parts of the city centre could be described as is looking empty and bland. The city scene is not to the same standard when compared to that of the Gloucester Docks area. And parts of the city centre needs uplifting.

Gloucester City Councils mission is to get more people outside and green the grey in our city. We know adding beautiful planters and softening an urban landscape are great ways to achieve this. They create colourful and welcoming spaces for communities that people want to spend time in and enjoy.

Here are five reasons why improvements should be considered to help the city.

Improved air quality

Did you know plants absorb carbon dioxide and release oxygen into the air? This is the process known as photosynthesis and as humans breathe in oxygen and breathe out carbon dioxide plants do the opposite making the surrounding air quality better. Trees and plants also act as filters for urban pollutants and fine particulates by trapping the nasties in their leaves and bark. That’s why the more plants we have in our Gloucester City environment the better, they not only help us breathe better and cleaner air they form an essential part of our surrounding atmosphere.

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Studies have proven that seeing and being close to plants helps reduce anxiety and stress levels in human beings. Gloucester City is dominated by the hospital tower block some older 1960s apartment blocks that don’t have any outside space, that can have a negative effect on adults and children including decreased concentration levels and increased psychological stress. Providing planters in Gloucester will help bring people closer to nature, they will create inviting greener spaces and people are more likely to leave their homes, go outside and exercise if there are attractive spaces filled with colourful plants to enjoy.

Sustainable communities

The fact is we all want to contribute to living in a more sustainable world, in cities there are a number of ways we can use plants to contribute to our sustainable development. Rooftop allotments are a great way of growing fruit and vegetables in a sustainable way, it has long term environmental benefits; saves money and is much more nutritious than shop bought produce. The community benefits are also greater as urban gardening connects the community together over common sustainable purposes.

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- To look into the feasibility of using several roof top spaces on City Council buildings around the city that are not being used for another purpose for urban allotments.
- To look into the possibility of business sponsorship of any new street furniture in the gate streets, prior to installation.”

78.4 Councillor O'Donnell proposed and Councillor A. Chambers seconded the following motion:

“Council members,

Motion that addresses a critical issue within our community – the urgent need for emergency accommodation. It is no secret that our city is facing a growing crisis of homelessness, exacerbated by a lack of affordable housing options. In light of this, I propose that we explore the possibility of converting empty properties into emergency accommodation to provide relief to those in need.

Empty properties, whether they be vacant homes, or abandoned buildings, can present an opportunity to address the pressing issue of emergency housing. By repurposing these properties, we can swiftly provide safe and

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secure accommodation to individuals and families who find themselves without a home due to unforeseen circumstances.

This motion aims to achieve several key objectives:

1. Utilising Existing Resources: Empty properties represent an underutilised resource within our community. By converting them into emergency accommodation, we could make the most of these existing structures and ensure that they serve a purpose in addressing the urgent needs of our most vulnerable residents.
2. Swift Response to Emergencies: Converting empty properties into emergency accommodation could provide additional accommodation, along with other rest centres to help us to respond quickly to crises such as natural disasters, economic downturns, or sudden displacement. This immediate response could add another element to ensure that individuals and families have a safe place to stay during times of uncertainty.
3. Cost-Effective Solution: Repurposing existing structures, we can minimise expenses while still providing essential shelter and support services to those in need quickly.
4. Community Engagement and Revitalisation: This motion also presents an opportunity for community engagement and revitalisation. By converting empty properties, we can breathe new life into neglected areas, fostering a sense of pride and community ownership. This approach not only addresses the immediate need for emergency accommodation but also contributes to the long-term development of our city.

To achieve these objectives, I propose the following actions:

1. Update an inventory: Update a comprehensive survey to identify and assess empty properties within our jurisdiction that have the potential to be converted into emergency accommodation.
2. Establish partnerships: Continue to collaborate with relevant stakeholders, including property owners, community organisations, and housing agencies, to develop solutions for converting empty properties into emergency accommodation. This partnership will ensure the efficient utilisation of resources and expertise.
3. Streamline regulations: To continue to review local policy to encourage property owners to participate in this initiative.
4. Allocate funding: To continue with identifying and acquiring property to support consider the conversion of empty properties into emergency accommodation.
5. Monitor and evaluate: Establish a monitoring and evaluation framework to assess the effectiveness of the converted emergency accommodation and make necessary adjustments to ensure optimal outcomes for the residents.

Conclusion

In conclusion, converting empty properties into emergency accommodation may present a viable and practical solution to address the pressing issue of homelessness and displacement within our community. By repurposing these properties, we can provide relief to those in need, utilise existing

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resources, and foster community engagement and revitalisation. I urge all council members to support this motion and work together to make a positive impact on the lives of our most vulnerable residents.”

78.5 The motion was put to a vote and was carried.

78.6 **RESOLVED that:-**

“Council members,

Motion that addresses a critical issue within our community – the urgent need for emergency accommodation. It is no secret that our city is facing a growing crisis of homelessness, exacerbated by a lack of affordable housing options. In light of this, I propose that we explore the possibility of converting empty properties into emergency accommodation to provide relief to those in need.

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Conclusion

In conclusion, converting empty properties into emergency accommodation may present a viable and practical solution to address the pressing issue of homelessness and displacement within our community. By repurposing these properties, we can provide relief to those in need, utilise existing resources, and foster community engagement and revitalisation. I urge all council members to support this motion and work together to make a positive impact on the lives of our most vulnerable residents.”

- 78.6 Councillor A. Chambers proposed and Councillor O'Donnell seconded the following motion:

“City council motion to ensure equality for hidden disabilities and undertake an audit of council equipment and buildings for disabled inclusion and compliance with Part M building regulations.

This council notes that there are areas of the city council that are not disability compliant and that there is disability discrimination in many parts. For example the very basic of democracy requires a platform for public speaking. It was evident that the city council's democratic public speaking platform was not all inclusive and that public residents attending the council meeting who were disabled were unable to access the public speaking platform. The public speaking platform/Podium was unable to be reached by the wheel chair users, the speaker platform/podium did not have enough space around it for wheel chair move ability/ turning and access, the speaker podium was too high for the wheel chair users to look over when delivering their questions to council. The speaker platform was not adjustable in anyway to suit disabled wheel chair users. This one very important piece of democracy for public speaking was breaching the equality act/ upsetting disabled public speaking residents and putting barriers in place for democracy. It meant that disabled public speakers were not treated the same as able bodied public speakers. Cllr Chambers demanded that the public speaking podium was immediately updated to an all inclusive one.

This council resolves to:

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1. Raise Awareness: Start by raising awareness about hidden disabilities among council members, Council staff, Council subcontractors and communication campaign to the general public. This can be done through workshops, training sessions, and awareness campaigns.
2. Conduct an Audit: Undertake a comprehensive audit of all council equipment and buildings to assess their accessibility and compliance with Part M building regulations. This audit should include a review of physical access, signage, parking, and other facilities.
3. Consult with Disability Organisations: Engage with disability organisations and advocacy groups to gather insights and recommendations on how to improve accessibility and inclusion for people with hidden disabilities. These organisations can provide valuable expertise and guidance throughout the process.
4. Develop an Inclusion Plan and amend/update existing plans: Based on the audit findings and input from disability organisations, develop an inclusion plan that outlines specific actions and timelines for improving accessibility and inclusion. This plan should address both physical barriers and attitudinal barriers that may exist within the council.
5. Implement Accessibility Measures: Implement the recommendations from the inclusion plan, which may include installing ramps, accessible parking spaces, braille signage, sensory-friendly spaces, and other accommodations to ensure equal access for people with hidden disabilities.
6. Train Staff: Provide training to council staff on disability awareness, inclusive practices, and how to effectively communicate and support individuals with hidden disabilities. This will help create a more inclusive and supportive environment within the council.
7. Monitor and Evaluate: Regularly monitor and evaluate the progress of the inclusion plan to ensure that the implemented measures are effective and meeting the needs of people with hidden disabilities. Make adjustments as necessary based on feedback and ongoing assessments.
8. Educate Councillors: Provide training to councillors on disability awareness, inclusive practices, and how to effectively communicate and support individuals with hidden disabilities. This will help create a more inclusive and supportive environment within the council chamber and interaction with the public.

The city council will consult with legal and accessibility experts to ensure compliance with local regulations/ national equality legislation and best practices.”

- 78.7 Councillor Norman moved and Councillor Padilla seconded the following amendment:

~~“City council motion to ensure equality for hidden disabilities and undertake an audit of council equipment and buildings for disabled inclusion and compliance with Part M building regulations.~~

This council notes that ~~there are areas of the~~ **it is important for the** city council that ~~are not to be~~ disability compliant and that ~~there is disability~~

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~~discrimination in many parts. For example the very basic of democracy requires a platform for public speaking. To was evident that the city councils democratic public speaking platform was not all inclusive and that public residents attending the council meeting who were disabled were unable to access the public speaking platform. The public speaking platform/Podium was unable to be reached by the wheel chair users, the speaker platform/podium did not have enough space around it for wheel chair move ability/ turning and access, the speaker podium was too high for the wheel chair users to look over when delivering their questions to council. The speaker platform was not adjustable in anyway to suit disabled wheel chair users. This one very important piece of democracy for public speaking was breaching the equality act/ upsetting disabled public speaking residents and putting barriers in place for democracy. It meant that disabled public speakers were not treated the same as able bodied public speakers. Cllr Chambers demanded that the public speaking podium was immediately updated to an all inclusive one.~~

At the January 2024 council meeting, members of the public were advised in advance of the arrangements for wheelchair users to ask their questions, however, we should and can do more to ensure that all residents can ask questions in the same disability compliant way. Many council buildings already have ramps, lifts and disabled toilet facilities, however regular review of disability compliance should be welcomed.

This council resolves to:

1. Raise Awareness: Start by raising awareness about hidden disabilities among council members, Council staff, Council subcontractors and a communication campaign to the general public. This can be done through workshops, training sessions, and awareness campaigns.
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6. Train Staff: Provide training to council staff on disability awareness, inclusive practices, and how to effectively communicate and support

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individuals with hidden disabilities. This will help create a more inclusive and supportive environment within the council.

7. Monitor and Evaluate: Regularly monitor and evaluate the progress of the inclusion plan to ensure that the implemented measures are effective and meeting the needs of people with hidden disabilities. Make adjustments as necessary based on feedback and ongoing assessments.
8. Educate Councillors **Awareness**: Provide training to councillors on disability awareness, inclusive practices, and how to effectively communicate and support individuals with hidden disabilities. This will help create a more inclusive and supportive environment within the council chamber and interaction with the public.

The city council will consult with legal and accessibility experts to ensure compliance with local regulations/ national equality legislation and best practices.”

- 78.8 The amendment was accepted by the proposer of the original motion and therefore became the substantive motion. The motion was put to a vote and was carried.

78.9 **RESOLVED that:-**

This council notes that it is important for the city council to be disability compliant.

At the January 2024 council meeting, members of the public were advised in advance of the arrangements for wheelchair users to ask their questions, however, we should and can do more to ensure that all residents can ask questions in the same disability compliant way. Many council buildings already have ramps, lifts and disabled toilet facilities, however regular review of disability compliance should be welcomed.

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accessibility and inclusion. This plan should address both physical barriers and attitudinal barriers that may exist within the council.

5. Implement Accessibility Measures: Implement the recommendations from the inclusion plan, which may include installing ramps, accessible parking spaces, braille signage, sensory-friendly spaces, and other accommodations to ensure equal access for people with hidden disabilities.
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The city council will consult with legal and accessibility experts to ensure compliance with local regulations/ national equality legislation and best practices.”

Time of commencement: 6.00 pm hours

Time of conclusion: 8.49 pm hours

Chair

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Gloucester City Council

Meeting:	Cabinet	Date:	7 February 2024
	Overview and Scrutiny Committee		5 February 2024
	Council		21 March 2024
Subject:	Climate Change Strategy and Action Plan		
Report Of:	Leader of the Council and Cabinet Member for Environment		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Jon Burke, Climate Change and Decarbonisation Lead		
	Email:	jon.burke@gloucester.gov.uk	Tel: 396170
Appendices:	1. Climate Change Strategy and Action Plan		

1.0 Purpose of Report

1.1 To agree a Climate Change Strategy and Action Plan.

2.0 Recommendations

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

2.2 Cabinet is asked to **RECOMMEND** to Council that the Gloucester City Council Climate Change Strategy and Action Plan at Appendix 1 be adopted and issued for public and key stakeholder consultation.

2.3 Council is asked to **RESOLVE** that

- (1) The Gloucester City Council Climate Change Strategy and Action Plan at Appendix 1 be adopted and issued for public and key stakeholder consultation.
- (2) Consideration be given to undertaking consultation in the form of roadshows, as well as online consultation, with a particular focus on ascertaining the views of young people on the Climate Change Strategy.
- (3) A Member Briefing be offered to new Councillors on the Climate Change Strategy following the 2024 local elections.
- (4) The development of the Climate Change Action Plan be driven at the highest political level, either through a designated Cabinet Member for Climate Change or a Member Champion.

3.0 Background

- 3.1 In 2019, against the backdrop of growing concern about the climate crisis, Gloucester City Council (GCC) declared a climate emergency. In doing so the council committed to reaching net zero emissions across its own functions by 2030 and working towards net zero emissions across the wider district by 2050; this target was subsequently brought forward to 2045 in November 2021 in line with the higher confidence thresholds of the Intergovernmental Panel on Climate Change's (IPCC) 1.5°C report.
- 3.2 Since 2019, the council has developed a range of sustainability and climate change policy documents. These included the 2022 Green Travel Plan and a 2020 Carbon Baseline for its own functions and the Gloucestershire airport estate, incorporating actions to reduce emissions.
- 3.3 In 2020, GCC set out in a report called Tackling Climate Change Roadmap, the actions that the council, its partners and Gloucester citizens can take to achieve the objectives of the Climate Change Emergency resolution as adopted in July 2019. The roadmap provided a broad overview of how the council could achieve its ambition. Climate change is also a key feature in the Gloucester City (Local) Plan 2011-2031 which engages with issues such as nature recovery, biodiversity, adaptation to flooding, renewable energy, sustainable neighbourhoods, air quality and transport. Further sustainability commitments can be found within the Council's 2022-2024 Council Plan 'Building a greener, fairer, better Gloucester', including the aim of ensuring that all capital projects funded by the council are net zero in operation alongside the ambition to be net carbon zero in construction.
- 3.4 However, following the Coronavirus pandemic – which radically reshaped the Council's emissions profile – it was deemed prudent to undertake the production of a new Climate Change Strategy and Action Plan that incorporated both of the Council's decarbonisation targets, established a more rigorous emissions baseline, and brought a greater degree of strategic focus to the Council's work in this area.
- 3.5 Additionally – for reasons of both good practice and as a condition of the Council's membership of the Global Covenant of Mayors for Energy and Climate – the Council undertook to deliver its first comprehensive Climate Risk and Vulnerability Assessment (CRVA), with the aim of understanding and reducing the district's exposure to climatic risks from global warming that are now regarded as inevitable by the UK Climate Change Committee and the IPCC.
- 3.6 To this end, and following a rigorous procurement process, [WSP consultants were appointed in March 2023 to deliver both a Climate Change Action Plan and a CRVA.](#)
- 3.7 WSP subsequently met with the Council's Climate Change Member Working Group on 17 April 2023 to introduce the company, its approach to drafting the required documents, and to take questions.
- 3.8 Following project initiation, WSP met weekly with the Climate Change and Decarbonisation Lead and regularly with the City Council Leader and Managing Director. The first draft of the Action Plan was shared with the Council Leader, Managing Director, and Climate Change Member Working Group on 6 August 2023. The second draft was shared with the Council Leader, Managing Director, Climate

Change Member Working, and – informally – with Members of Overview and Scrutiny on 30 October 2023.

- 3.9 Gloucester City Councillors and internal stakeholders participated in two workshops on 13 June and 29 September 2023 to provide information and validate the analysis and results provided by the team at WSP.
- 3.10 The final draft of the Climate Change Action Plan and CRVA are now deemed ready for adoption by the Council and to be put out to consultation to Gloucester residents and other key stakeholders.

4.0 Key Findings and Recommendations

Gloucester District Emissions Baseline

- 4.1 To achieve the goal of net zero emissions across the Gloucester District by 2045, the City Council Climate Action Plan has identified a set of actions and the stakeholders responsible for their delivery. A base year, 2019¹, has been identified to measure, monitor, and report the progress towards net zero emissions by 2045. Actions have been identified by estimating baseline carbon emissions for the district for 2019 that considers historical trends since 2005.
- 4.2 Overall, the district's carbon dioxide equivalent emissions reduced 26% from 2005 to 2019. In 2019, emissions accounted for 495 KtCO₂e. The trends observed in Gloucester District historic carbon emissions from 2005 to 2019 include:
- Emissions from gas consumption (43%) are the highest of all fuels, followed by electricity (28%) and petroleum (28%). However, the decarbonisation of the electricity grid has meant that emissions from electricity consumption have declined rapidly, a trend that the Department for Energy Security and Net Zero predicts will continue.
 - In Gloucester, the domestic sector is the dominant energy end use (34%), closely followed by industry (29%), and then transport (24%).
 - Fuel consumption Gloucester is aligned with UK trends. In 2019, in the UK 41% of emissions came from gas, used for heating homes, while petroleum is mostly used in road vehicles similar to Gloucester. While domestic emissions are the highest emitting sector in Gloucester, transport is the highest emitting sector in the UK (27%), followed by energy supply (21%), businesses (17%) and residential sector (15%). Similarly, Gloucester transport and commercial are also a key source of emissions.

Gloucester City Council Emissions Baseline

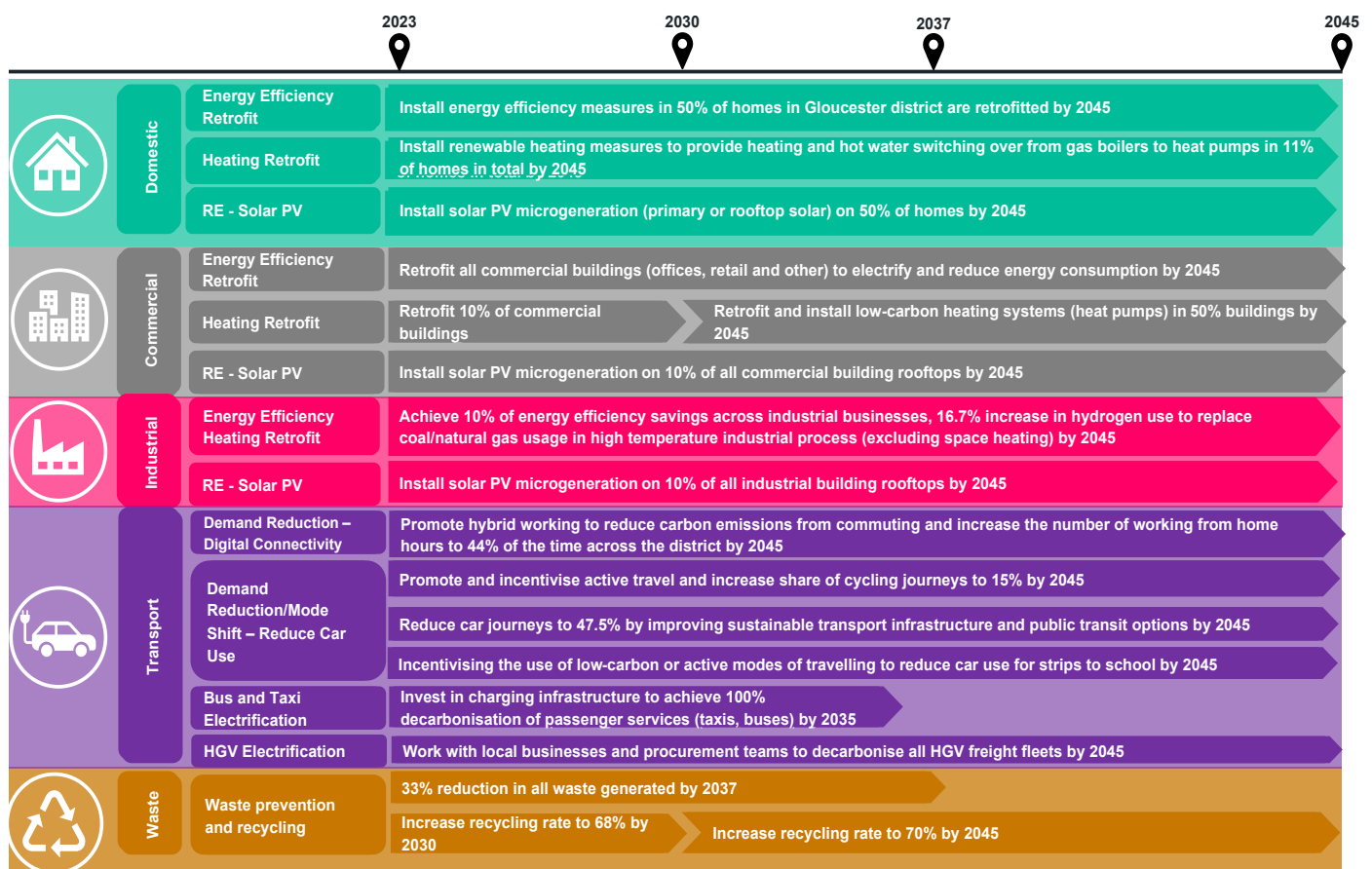
- 4.3 Gloucester City Council (GCC) is working towards net zero for its own operations by 2030. This target is aligned with its net zero target by 2045 for Gloucester District.
- 4.4 GCC emissions have been estimated by establishing an organisational boundary based upon operational control.

¹ 2019 has been selected as the base year instead of 2020, the last year of data available, recognising the impact and disruption caused by the COVID pandemic.

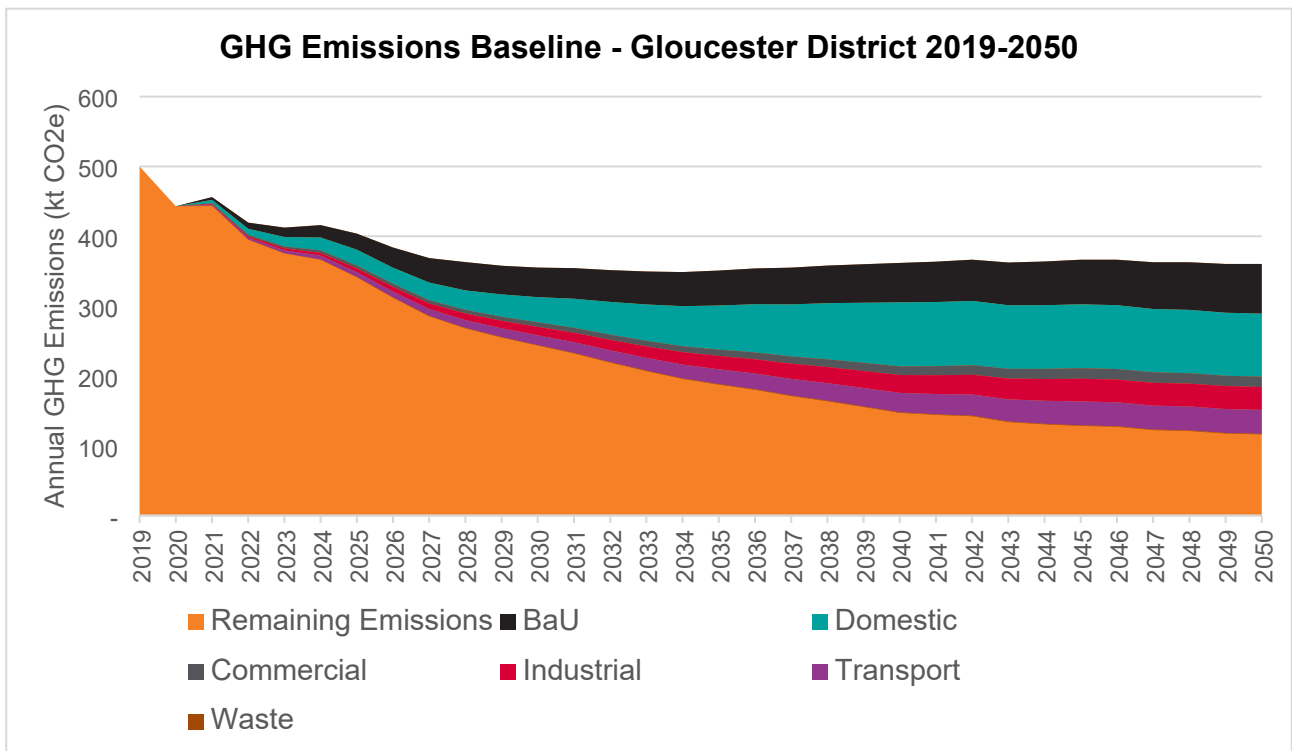
- 4.5 Assets owned by the council but leased to tenants or operated by third parties, have been excluded from the GHG baseline. Emissions from the operation of Gloucestershire Airport, partially owned by GCC, are referenced in section 4.7 of the GCAP.
- 4.6 The baseline year of 2021 was identified as the most recent year for which data was available covering the calendar period from January to December. Total carbon dioxide equivalents (CO₂e) emissions in 2021 accounted for 3,381 tCO₂e.
- 4.7 Scope 1 emissions accounted for 1,816 tCO₂e and represent more than half of all GHG emissions, followed by scope 3 with 28% and scope 2 with 18.3%. The biggest source of emissions is the consumption of gas in non-domestic buildings (37.7%), followed by electricity consumption in non-domestic buildings (18.3%) and fuel consumption by the council's vehicle fleet depot (16%). For scope 3 emissions, well-to-tank emissions (WTT) are from the extraction, refining and transportation of the fuel consumed by the council's operations, this will be reduced as electricity, gas, and fuel consumption decreases.
- 4.8 Decarbonisation of the electricity grid by 2030 (and further by 2050) means that emissions will reduce on their own as has already occurred in recent years. However, energy efficiency measures will need to continue to achieve net zero by 2030.

Gloucester District Pathway to Net Zero by 2045

- 4.9 To identify a pathway to net zero by 2045 for Gloucester District, the GHG reduction analysis was divided into five areas of opportunities: Domestic, Commercial, Industrial, Transport, Waste.

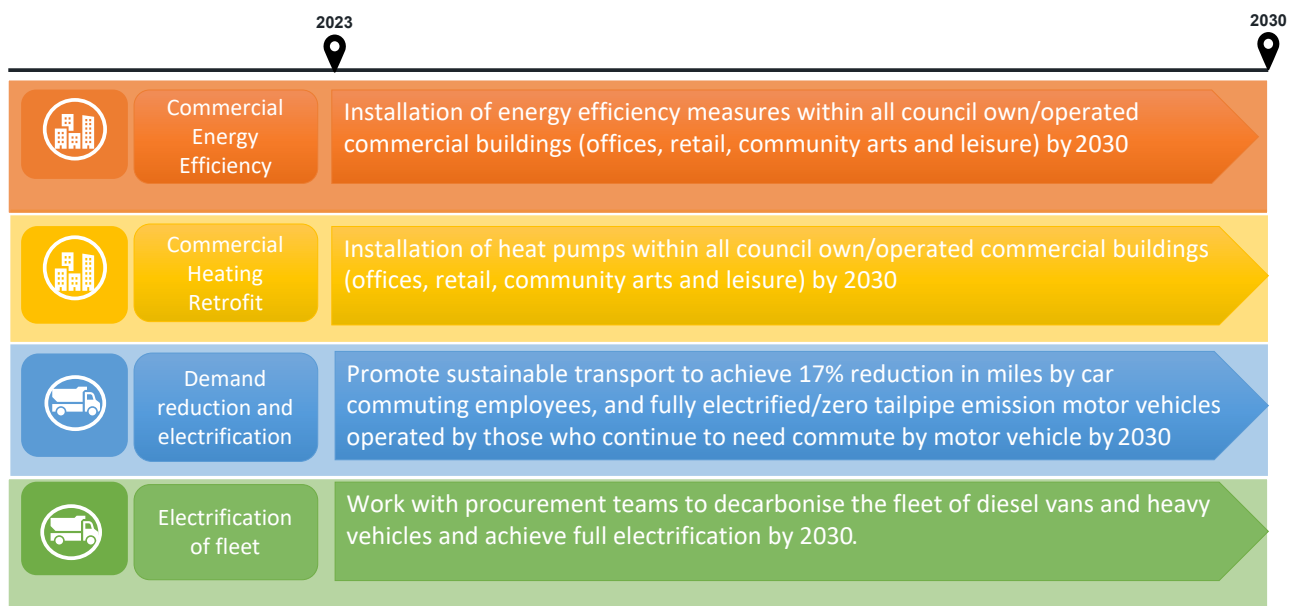


4.10 The contribution each theme can make to district decarbonisation has been modelled by the Climate Action Plan as follows:

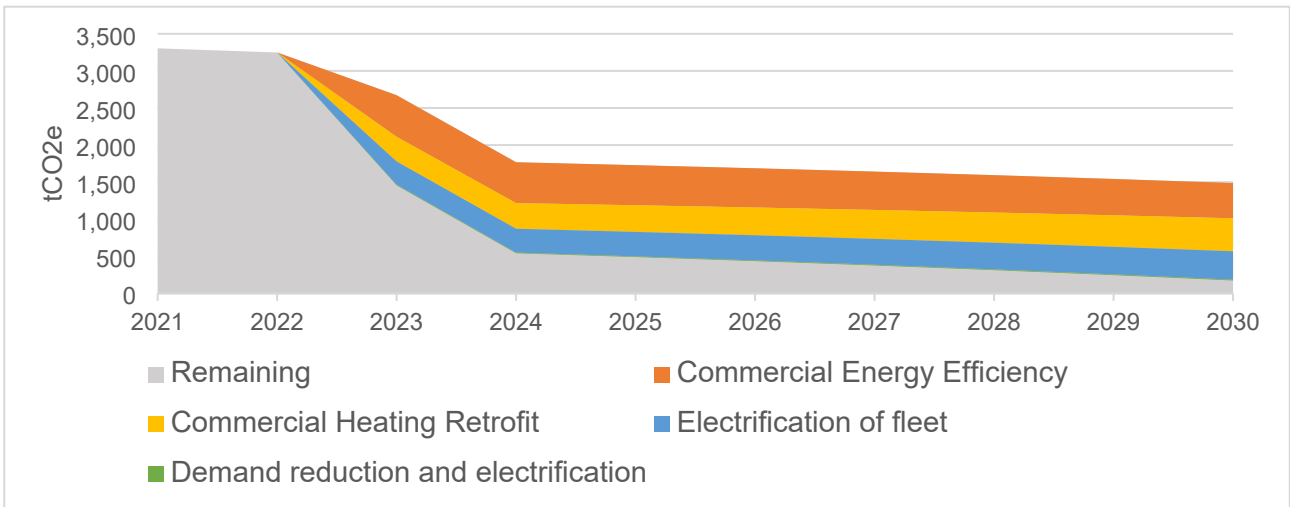


Delivering a Net Zero Carbon Gloucester City Council by 2030

4.11 To identify a pathway to net zero by 2030 for Gloucester City Council, the GHG reduction analysis was divided into five areas of opportunities: Commercial Energy Efficiency; Commercial Heating Retrofit; Demand Reduction and Electrification; Electrification of Fleet:



4.12 The contribution each theme can make to City Council decarbonisation has been modelled by the Climate Change Action Plan as follows:



5.0 Climate Risk and Vulnerability Assessment (CRVA)

5.1 The nature and extent of potential climate change risks and areas of vulnerability for Gloucester have been identified in a Climate Risk and Vulnerability Assessment (CRVA). The assessment was undertaken using the latest UK Climate Projections information and indicators (Met Office, 2022) (Arnell, 2021). The risks and opportunities were rated as low, medium, high and very high; in line with the corporate risk matrix and GCoM reporting standards. This was assessed based on the likelihood of the climate hazard occurring and, should the climate hazard occur, what would the impact or disruption look like.

5.2 WSP has used the latest UK Climate projections (UKCP18) and related tools to identify projected changes in climate for Gloucester. Based on these projections, by the 2080s, Gloucester will experience:

- The average summer day could be up to **5°C warmer**
- A shift in the growing season
- Increased winter rainfall by **over 20%**
- An increased likelihood of surface water and river flooding, influenced by tides and extreme rainfall
- An increase in the number and severity of wildfires
- Heatwaves occurring **six times** more often
- Three times** less frost days and a reduction in snowfall
- Reduced summer rainfall by **over 35%**
- An increase in the frequency and intensity of storms

5.3 As part of the CRVA, WSP were tasked with identifying priority risks to district and council arising from modelled climatic changes:

Theme	Priority Risks
Community Wellbeing	<ul style="list-style-type: none"> ■ Unsafe working conditions and reduced employee productivity. ■ Pressure on emergency, education, and health services. ■ Risks to physical and mental health. ■ Risk to the homeless. ■ Inability to travel, leading to isolation, missed medical appointments etc. ■ Increase in antisocial behaviour and crime. ■ Issues with deliveries of supplies such as food or medicine. ■ Forced migration and civil conflict.
Infrastructure (IT, transport, energy)	<ul style="list-style-type: none"> ■ Damage to infrastructure, such as IT equipment. ■ Road / rail accidents. ■ Disruption of transport, including congestion and delays. ■ Loss of power.
Biodiversity and Environment	<ul style="list-style-type: none"> ■ Damage to and/or loss of crops. ■ Increase pressure on water supply. ■ Damage to young trees, impacting establishment. ■ Increased tide levels, due to wind and sea level rise, leading to increased risk of flooding. ■ Increased tree and branch fall. ■ Increase in pests, pathogens, and invasive species. ■ Decline in species populations and habitats.
Housing and Buildings	<ul style="list-style-type: none"> ■ Damage to / flooding of vulnerable assets, such as schools, care homes, children's homes, health centre's etc. ■ Flooding of homes and businesses. ■ Increase in risk of subsidence or landslides. ■ Destruction of homes and businesses due to wildfire or storms. ■ Displacement of residents. ■ Risk of mould.
Waste and Water	<ul style="list-style-type: none"> ■ Introductions of water restrictions ■ Contamination of water supplies ■ Reduced efficiency of burning waste ■ Water supply interruptions ■ Asset flooding ■ Strain on street cleaning services
Culture Leisure and Tourism	<ul style="list-style-type: none"> ■ Increase in public safety concerns regarding health. ■ Loss of business. ■ Overheating of outdoor sports facilities. ■ Increased risk of fire.

- 5.4 Having identified key risks to the district arising from global warming and associated climatic changes, the CRVA also provides extensive examples of how local authorities and key stakeholders within the municipal boundary can reduce localised impacts of climate change risks.

6.0 Social Value Considerations

- 6.1 WSP have prepared an educational tool for third parties and key stakeholders in the district for the purposes of fulfilling their social value obligations under the contract with the Council. This tool comprises a recording that has now been provided by WSP and will be made available to private and third sector stakeholders in January 2024.

7.0 Environmental Implications

- 7.1 The environmental implications of the Climate Action Plan and Climate Risk and Vulnerability Assessment are both local and global. In terms of climate impact, reductions in Gloucester City Council and the wider district's greenhouse gas emissions will contribute to the U.K's Nationally Determined Contribution to international efforts to limit human-induced global warming to 1.5C above pre-industrial levels. Doing so will limit the extreme weather and climate-related risks associated with global warming (see section 5.0).
- 7.2 The Climate Risk and Vulnerability Assessment reflects the need to plan for the mitigation of global warming-induced extreme weather that is likely at current and future levels of global warming that are now unavoidable. By taking a rigorous, strategic approach to climate risk in the district as early as possible, we can reduce risks to human life and public service continuity.
- 7.3 The Climate Action Plan's focus on the necessity for capital investment in building fabric, the energy system, and surface transport decarbonisation presents a range of commercial and employment opportunities for the residents of Gloucester, helping to sustain and enhance economic prosperity in the district. The fiscal multiplier associated with such economic activity will also have cascading effects for the wider local economy.

8.0 Alternative Options Considered

- 8.1 The alternative option would be for the City Council to have not undertaken delivery of the Climate Action Plan and CRVA. However, this would not have been conducive to the delivery of an orderly approach to decarbonisation at the level of either the district or council. Furthermore, both a comprehensive Climate Action Plan and CRVA are conditions of membership of the Global Covenant of Mayors for Energy and Climate.

9.0 Reasons for Recommendations

- 9.1 In 2019, Gloucester City Council (GCC) declared a climate emergency. In doing so the council committed to reaching net zero emissions across its own functions by 2030 and working towards net zero emissions across the wider district by 2050; this target was subsequently brought forward to 2045 in November 2021 in line with the higher confidence thresholds of the Intergovernmental Panel on Climate Change's (IPCC) 1.5°C report.

- 9.2 In approving the recommendations of this report, Council will be supporting further progress towards the achievement of its stated decarbonisation goals in consultation with key stakeholders and residents of Gloucester.

10.0 Future Work and Conclusions

- 10.1 Subject to adoption by Council, the Climate Change Strategy and Action Plan should be put out for public consultation.
- 10.2 Subject to any final amendments, the Climate Action Plan should, using all best endeavours, be actioned by relevant officers under the direction of relevant Cabinet Member, Managing Director, Climate Change and Decarbonisation Lead.
- 10.3 In compliance with members of the Global Covenant of Mayors for Energy and Climate, biennial monitoring of progress should be undertaken and made publicly available.

11.0 Financial Implications

- 11.1 This strategy highlights areas which will need to be considered to achieve our climate goals. This will involve significant capital projects to improve our estate and revenue funds to highlight and promote the strategy with our partners. Individual business plans for projects will be required for future projects, highlighting financial implications through the development of business plans which show investment and payback timeframes.

Financial Services have been consulted in the preparation of this report

12.0 Legal Implications

- 12.1 The overarching legislative context of the Gloucester Climate Action Plan is the Climate Change Act 2008. This Act places a legal duty on central government to set legally binding targets to reduce UK greenhouse gas emissions to net-zero by 2050.
- 12.2 Where specific projects or actions are required going forward to support the Gloucester Climate Action Plan further legal advice and support will be sought from One Legal.
- 12.3 The Council must ensure that any decisions taken must be in accordance with the Council's Constitution and Financial Rules, particularly in regard to decision making, implementation of strategy/action plans and any funding requirements.

One Legal have been consulted in the preparation of this report

13.0 Risk & Opportunity Management Implications

- 13.1 The Climate Action Plan and Climate Risk and Vulnerability Assessment represents an active attempt at managing local risks associated with global warming in a rational, strategic, and progressive manner. In identifying risks and opportunities for decarbonisation in the district, officers will be able to deliver projects with more robust business cases and target areas for greatest decarbonisation potential.

14.0 People Impact Assessment (PIA) and Safeguarding:

14.1 Supplied. The initial screening indicated that the implementation of this climate action plan will have largely positive impacts on those with protected characteristics, as those people tend to be more affected by climate change and risk. However, individual projects arising from the Plan will require their own People Impact Assessments as and when they come forward.

15.0 Community Safety Implications

15.1 By reducing the potential for social disruption presented by global warming-induced extreme weather, the Climate Action Plan and Climate Risk and Vulnerability Assessment will deliver long-term benefits in respect of Community Safety.

16.0 Staffing & Trade Union Implications

16.1 None.

Background Documents: None



Gloucester Climate Change Strategy (GCCS)

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Foreword



Councillor Richard Cook

Leader of the Council
and Cabinet Member for
Environment.

As Leader of Gloucester City Council and Cabinet Member for Environment, I am only too aware of the gravity of the climate crisis, the urgency required to address it, and the appetite of both Councillors and the people of our city to see action at both the level of the council and the wider district.

That is why we are committed to delivering Net Zero Emissions across the council's functions by 2030 – having brought the target forward five years – and to do everything within the council's powers to achieve carbon neutrality across the wider district by 2045: in line with the findings of the Intergovernmental Panel on Climate Change's 1.5C report.

The council has already successfully lobbied the Government to reduce taxes on home energy measures, such as insulation and solar panels; called for support for onshore wind and low carbon building renovation, which presents huge opportunities to upskill Gloucester's workforce; and we have become a member of both the Global Covenant of Mayors for Energy and Climate and the UK100 group of councils committed to vigorous action on decarbonisation.

By supporting the rollout of electric vehicle charge points across the district, consuming 100% renewable electricity, helping residents to maintain high recycling rates, and delivering an ambitious programme of tree and wildflower meadow planting, and water course naturalisation, Gloucester City Council is already demonstrating its appetite for practical and effective climate action, but we understand that there is so much more we need to do.

This strategy represents a big step forward our understanding of the Council's and wider district's emissions and, for the first time, combines this information with decarbonisation pathways and credible approaches to achieving our goals.

But we also recognise – in light of the droughts, extreme heat events, flooding, and other increasing signals of global warming – that the Council has a duty to help the city prepare for a future in which the climate we have known becomes much less predictable, which is why an important element of the Climate Change Strategy is its climate risk assessment.

And we are taking that leadership role on climate resilience even further as lead council for climate change adaptation on the cross-county body Climate Leadership Gloucestershire. Our mission in that role is ensure that all districts within the Gloucestershire County Council area are prepared for the climatic changes that existing and future greenhouse gas emissions now make inevitable.

The transition to a low carbon world presents huge challenges, but it also presents huge opportunities. For jobs, security, and prosperity. We, as a Council, cannot deliver this transition alone – for that, we need to work with businesses, our ambitious higher education sector, and the people of Gloucester – but we can show leadership through reducing our own carbon footprint, working with other districts and the county council to increase the impact of these measures, and improve the district’s preparedness to climate change.

In that role, we take inspiration from the faith, industry, and long-term vision of the people who built our city’s world-famous cathedral. This strategy represents our own attempt to build something of which Gloucester and its people can be equally proud.

Executive Summary

Gloucester City Council (GCC) is committed to reaching net zero emissions across its own functions by 2030 and working towards net zero emissions across the wider district by 2045.

GCC announced a climate emergency in July 2019, joining over 300 local authorities and councils in England aiming to be carbon neutral 20 years before the national target. Local leadership as well as partnerships between central and local government is needed to tackle climate change.

Councils are well placed to support the Government to meet its net zero emissions target by 2050. The Gloucester Climate Change Strategy (GCCS) has been developed for Gloucester District to enable communities, local businesses, and every household to work towards meeting the district's ambitious 2045 net zero target and enhance resilience to the impacts of climate change. The GCCS also provides actions for GCC to achieve net zero emissions by 2030 across its own operations.

This GCCS provides a set of actions across mitigation and adaptation efforts focused on areas of opportunities. By adopting these actions, the associated reduction in emissions will contribute to building a more environmentally, sustainable and resilient Gloucester.

With the proposed energy, transport and waste interventions implemented by 2045, Gloucester could achieve a 76.3% reduction in GHG emissions in the district and a 95% reduction in GHG emissions in Gloucester City Council's own functions by 2030.

By 2045, homes in the District of Gloucester will need to install heating measures for space heating and hot water to achieve the greatest reductions in GHG emissions in the district.

By 2030, installing energy efficiency measures in offices, retail and other types of commercial properties provides significant carbon reduction for the council's own operations.

To achieve net zero emissions goals, carbon removals and offsets would be required. The protection and regeneration of green spaces, ecosystems and biodiversity can provide opportunities for carbon removal to Gloucester District and GCC, in addition to increased well-being.



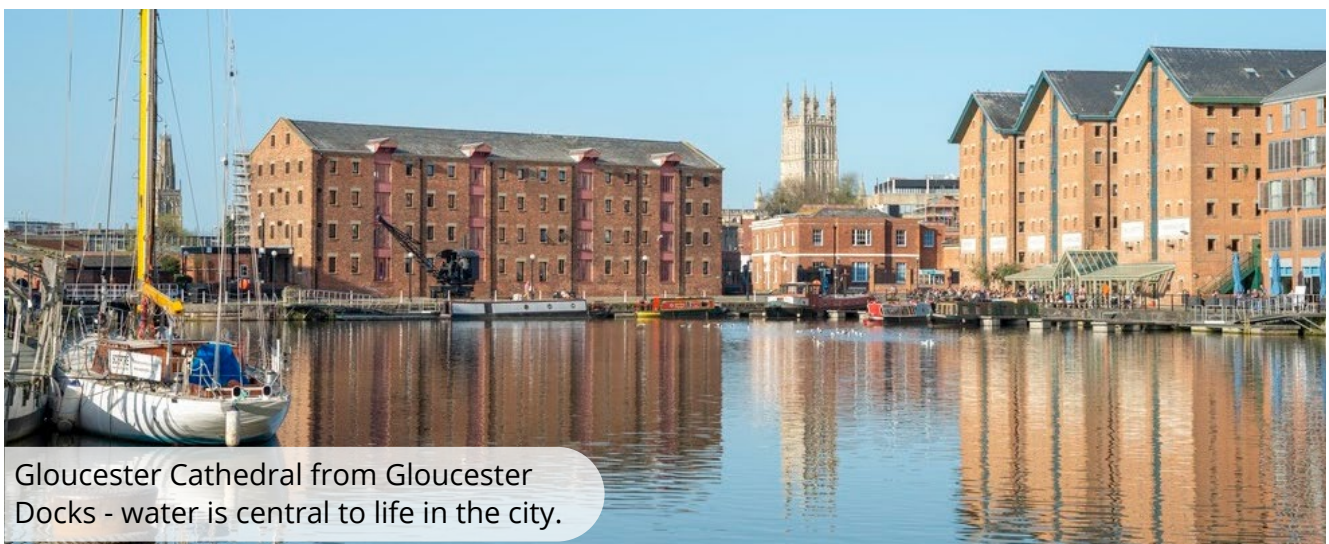
1. Introduction And Context

1.1. Local Context

In 2019, against the backdrop of growing concern about the climate crisis, Gloucester City Council (GCC) declared a climate emergency. In doing so the council committed to reaching net zero emissions across its own functions by 2030 and working towards net zero emissions across the wider district by 2045.

Since 2019, the council has developed a range of sustainability and climate change policy documents. These included the 2022 Green Travel Plan and a 2020 Carbon Baseline for its own functions and the Gloucestershire airport estate, incorporating actions to reduce emissions. In 2020, GCC set out in a report called Tackling Climate Change Roadmap, the actions that the council, its partners and Gloucester citizens can take to achieve the objectives of the Climate Change Emergency resolution as adopted in July 2019. The roadmap provided a broad overview of how the council could achieve its ambition. Climate change is also a key feature in the Gloucester City Plan 2011-2031 which engages with issues such as nature recovery, biodiversity, adaptation to flooding, renewable energy, sustainable neighbourhoods, air quality and transport. Further sustainability commitments can be found within the council's 2022-2024 Plan including promises to continually monitor and annual report on energy use across the council's estate, and to ensure that all capital projects funded by the council are net zero in operation with the ambition to be net carbon zero in construction too.

Through the UK100's Local Power in Action programme and Climate Leadership Gloucestershire, GCC is working collaboratively with local partners to achieve its sustainability goals. In January 2023 the council joined all Gloucestershire local authorities in taking collective action to deliver net zero transport, agreeing to work together on a county-wide project to tackle transport decarbonisation and achieve net zero by 2045. This commitment includes aligning Local Plans and Local Transport Plans with the county's net zero goals, supporting local efforts to create sustainable neighbourhoods and encouraging more active travel. GCC is also part of Climate Leadership Gloucestershire (CLG) which brings together councils and other strategic partners covered by the County Council. At a wider scale Gloucester City Council is a member of the Global Covenant of Mayors (GCoM) and the UK100 Network. See section 6.6 for further information about partnerships.



Gloucester Cathedral from Gloucester Docks - water is central to life in the city.

1.2. National And International

At a national level the UK Government has set a target of achieving net zero emissions across the entire country by 2050 and, under its commitment to the Paris Agreement, has pledged to cut emissions by 68% by 2030. To achieve this the UK government has developed a Net Zero Strategy which sets out policies and proposals for decarbonising all sectors of the UK economy to meet the 2050 target. The Climate Change Act (2008) forms the basis of the country's legally binding net zero target and requires the government to set 'carbon budgets' to act as stepping stones towards 2050.

At a global scale the UN Climate Change Conference Paris Agreement (2015) was the world's first comprehensive climate treaty and commits the majority of the world's governments to addressing climate change. In particular the Agreement aims to limit global temperature increase to below 2 degrees Celsius, while pursuing efforts to limit the increase to 1.5 degrees. The Intergovernmental Panel on Climate Change's (IPCC) Sixth Assessment Report (published between 2021-2023) issued a 'code red', projecting that significant climate-related changes will be felt in all global regions in the coming decades.

The UK Climate Change Risk Assessment (CCRA) sets out the risks and opportunities facing the UK from climate change. It includes summaries and sector-specific briefings that explore climate risks and opportunities across the UK. The CCRA provides the evidence base for the Government's National Adaptation Programmes, the third of which (NAP3) was published in July 2023. The NAP3 sets out a strategic five-year plan to boost resilience and protect communities against climate change risks. Defra has published key documents including Climate Change Adaptation: Policy Information and Good Practice Guidance for Local Government.

The Climate Change Committee (CCC) is an independent statutory body established under the Climate Change Act 2008 which advises the UK and devolved governments on mitigation and adaptation plans. It has called for making resilience to climate change a national priority and advised increasing the pace and ambition of policy development and implementation of climate action.

The Paris Agreement recognises the role of local governments in meeting it's ambitious goal of limiting global warming to 1.5°C. City government networks like the Global Covenant of Mayors for Climate & Energy (GCoM) share a long-term vision of supporting voluntary action to combat climate change in line with the Paris Agreement. While there are currently no statutory targets or mandatory reporting mechanisms for local authorities in England, growing pressure may change this in the coming years. This presents an opportunity for Gloucester City Council to get ahead of the curve, lead by example and achieve its vision of a more environmentally sustainable and resilient Gloucester.



2. Why is a Climate Change Strategy Needed for Gloucester?

2.1. The Purpose of Gloucester Climate Change Strategy (GCCS)

This Gloucester Climate Change Strategy (GCCS) is a tool to ensure that climate and nature are considered in all decision-making and investments and sets out the vision and actions for achieving net zero.

GCC has worked with WSP to develop this GCCS for stakeholders to work towards net zero emissions across the Council's own functions by 2030 and across the wider district by 2045. The GCCS estimates the carbon savings of existing actions and identifies additional interventions required to achieve the net zero goal. In line with GCC's commitments, the decarbonisation interventions outlined within the GCCS primarily focuses on scope 1 and 2 emissions.

As part of the GCCS, WSP also supported GCC with undertaking a Climate Risk and Vulnerability Assessment (CRVA). This Assessment is a tool for identifying and prioritising the council's climate change related risks and tests the effectiveness of existing climate risk management strategies to cope with the predicted effects of climate change.

The Assessment considers baseline climate, climate projections and key climate hazards. It also assesses the risk to vulnerable groups and engages with internal stakeholders to identify potential threats and opportunities.

2.2. Key Drivers

GCC recognises the urgency of climate change and is committed to tackling the climate emergency. The council also recognises its duty to help achieve the UK's legally binding net zero emissions target by 2050 and the Sixth Carbon Budget required under the Climate Change Act. Even though the Act does not include a statutory duty for local authorities, the council has set ambitious climate action targets for the council's own operations and Gloucester District as listed below:

- ▶ Meet Gloucester's net zero commitments (net zero emissions across the council's own functions by 2030 and across the wider district by 2045);
- ▶ Increase public awareness of climate change; and
- ▶ Enable Gloucester, its citizens and biodiversity to adapt to the changes brought about by climate change to ensure the maintenance of a high quality of life.



Flooding in Gloucester, which warming is projected to intensify.

2.3. Vision and Objectives

The Council Plan 2022-2024 sets out Gloucester City Council’s strategic direction over the next three years with a vision for the council, its partners and residents “to build a greener, fairer, better Gloucester.” To achieve this, the GCCS identified five sectoral focus areas for which actions will be identified within the objectives:

- ▶ **Energy:** Promote energy efficiency, reduce energy consumption, decarbonise heating and increase renewable energy generation in domestic, industrial, and commercial properties in Gloucester District and Gloucester City Council.
- ▶ **Transport:** Promote sustainable modes of transport, including hybrid working practices, enable the electrification of transport, while supporting walking and cycling, and improving public and multi-modal transport in Gloucester District and Gloucester City Council.
- ▶ **Waste:** Promote the reduction of waste generated and increase recycling rates in Gloucester District and Gloucester City Council.
- ▶ **Biodiversity:** To safeguard and create green spaces that enhance biodiversity, facilitate active travel, link neighbourhoods, and protect communities from the impacts of the climate crisis in Gloucester District and Gloucester City Council.
- ▶ **Resilience:** Ensure that people, nature, our prosperity, and way of life in Gloucester District and Gloucester City Council are adaptable to a changing climate and strengthen the ability to anticipate and cope and recover from unavoidable impacts.

|| The GCCS supports GCC to:

- ▶ Provide a comprehensive, public-facing, evidence-based Climate Change Strategy aligned with GCC’s targets; and
- ▶ Increase the resilience of Gloucester to climatic consequences of human-induced global warming.



3. Our Approach to The Gloucester Climate Change Strategy (GCCS)

The Gloucester Climate Change Strategy (GCCS) has been prepared to bring strategic rigour Gloucester City Council's (GCC) commitment to achieving net zero emissions across its own functions and carbon neutrality across the wider district. The Plan has been developed in collaboration with GCC officers who have contributed to:

- ▶ **Mitigation – Achieving Net Zero Emissions:** Establishing a baseline for emissions for the district and GCC to identify actions to achieve net zero emissions by 2045 and 2030 respectively.
- ▶ **Adaptation – Understanding Vulnerability to Climate Change:** Assessing climate risk and vulnerability to determine actions to improve the GCC's resilience to climate change.

3.1. Mitigation – Achieving Net Zero Emissions

To identify the actions included in the GCCS, GCC councillors and internal stakeholders participated in two workshops to provide information and validate the analysis and results provided by the team at WSP. Figure 3-1 describes our methodology, while the section below describes the approach and baseline emissions for the district and GCC:

- Part 1 – Gloucester District Emissions Baseline
- Part 2 – Gloucester City Council Emissions Baseline

Figure 3-1. The Process of the Climate Mitigation Assessment. Source: WSP



Step 1:

Collecting data to model Gloucester District and Gloucester City Council carbon baseline.

Step 2:

Developing carbon baseline of emissions for Gloucester District and Gloucester City Council carbon baseline and identify and validate key sectors and emissions trends.

Step 3:

Identify areas of opportunity for decarbonisation and existing actions.

Step 4:

Design and validate actions by adjusting the level of efforts with stakeholders and model the path to net zero emissions.

|| Part 1 - Gloucester District Emissions Baseline

To achieve its goal of net zero emissions across the Gloucester District by 2045, GCC must identify a set of actions and the stakeholders responsible for their delivery. A base year, 2019, has been identified to measure, monitor, and report the progress towards net zero emissions by 2045. Actions have been identified by estimating baseline carbon emissions for the district for 2019 that considers historical trends since 2005.

A business-as-usual (BAU) scenario was modelled to account for the impact for Gloucester of the implementation of national level policies, plans, and trends, assuming a continuation of the ongoing effort and fulfilment of existing commitments. Even with no further interventions, the BAU scenario represents a significant reduction in emissions, as outlined in policies detailed below. Modelled policies include:

- ▶ Domestic Minimum Energy Efficiency Standard (MEES);
- ▶ Transport electrification, including ICE (internal combustion engines) sale ban in 2035; and
- ▶ Electricity grid decarbonisation.

|| Gloucester District Historic Carbon Emissions 2005-2019

Carbon emissions have reduced 26% from 2005-2019 as shown in Figure 3-2. In 2019, emissions accounted for 495 KtCO₂e. These emissions have been quantified by developing an energy carbon model for Gloucester District based on WSP's local authority tool. The model primarily uses the Department for Energy Security and Net Zero -DESNZ (2021) sub-national total final energy consumption data to characterise the district and understand the total scale of the actions needed to achieve net zero emissions by 2045. The trends observed in Gloucester District historic carbon emissions from 2005 and 2019 include:

- ▶ Emissions from gas consumption (43%) are the highest of all fuels, followed by electricity (28%) and petroleum (28%) as shown in Figure 3-2 and Figure 3-3. However, the decarbonisation of the electricity grid has meant that emissions from electricity consumption have declined rapidly, a trend that DESNZ predicts will continue as shown in Treasury Green Book projections.
- ▶ In Gloucester, the domestic sector is the dominant energy end use (34%), closely followed by industry (29%), and then transport (24%). The carbon intensity of electricity is now lower than that of gas. In order to meet the District and UK carbon emissions targets, the district must prioritise a shift away from gas use in domestic and commercial buildings, as well as a move to electrifying the transport sector to avoid the use of fossil fuels, such as petrol or diesel.
- ▶ Fuel consumption Gloucester is aligned with UK trends. In 2019, in the UK 41% of emissions came from gas, used for heating homes, while petroleum is mostly used in road vehicles similar to Gloucester. While domestic emissions are the highest emitting sector in Gloucester, transport is the highest emitting sector in the UK (27%), followed by energy supply (21%), businesses (17%) and residential sector (15%). Similarly, Gloucester transport and commercial are also a key source of emissions.

Figure 3-2. Gloucester District Carbon Emissions by Fuel Type 2005-2019
Source: WSP with Data from DESNZ

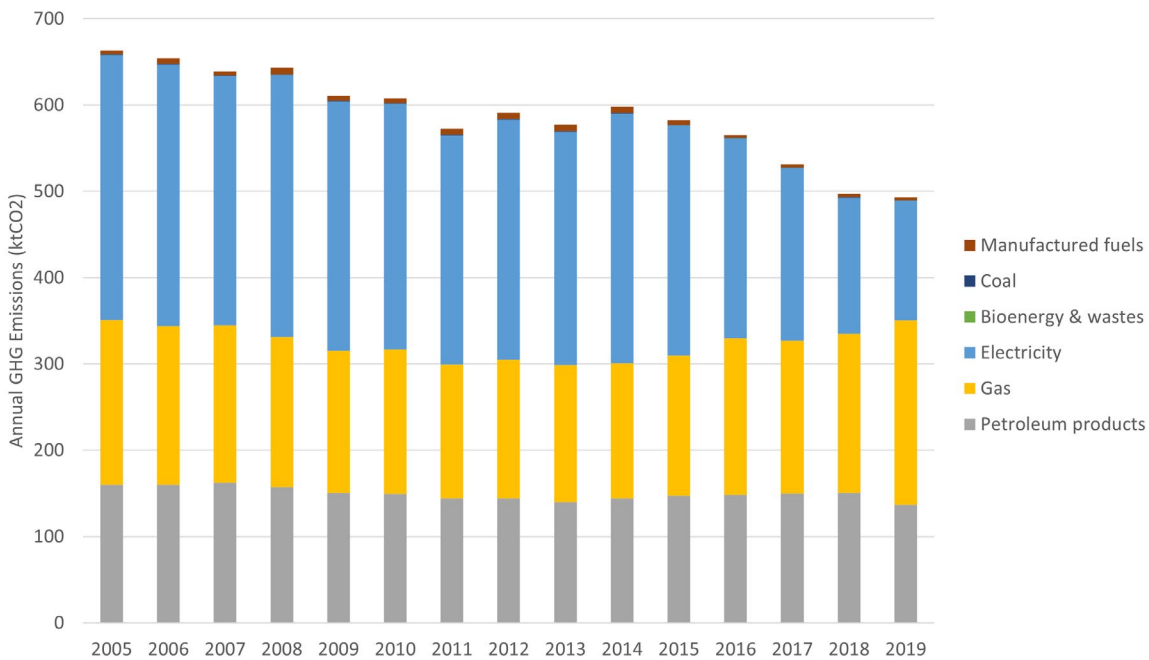
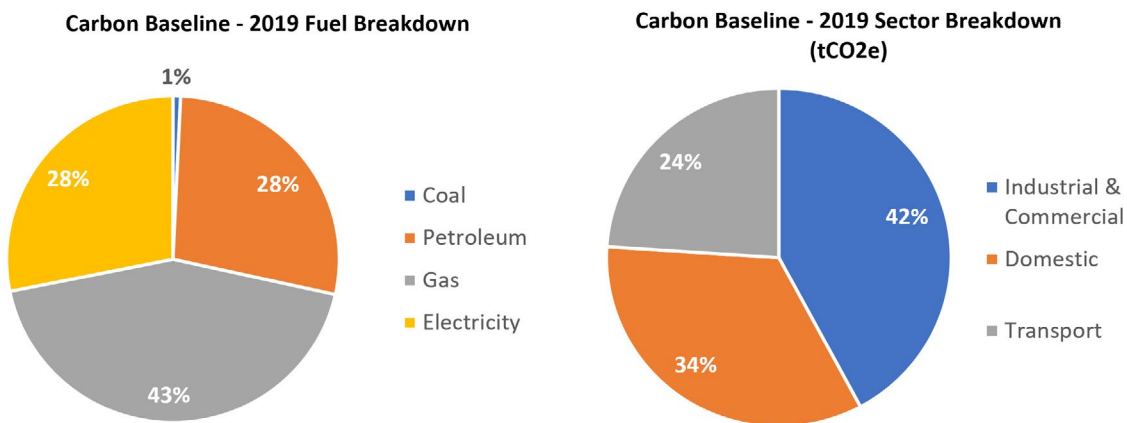


Figure 3-3. Annual Gloucester District Carbon Emissions Splits in 2019.
Source: WSP with Data from DESNZ

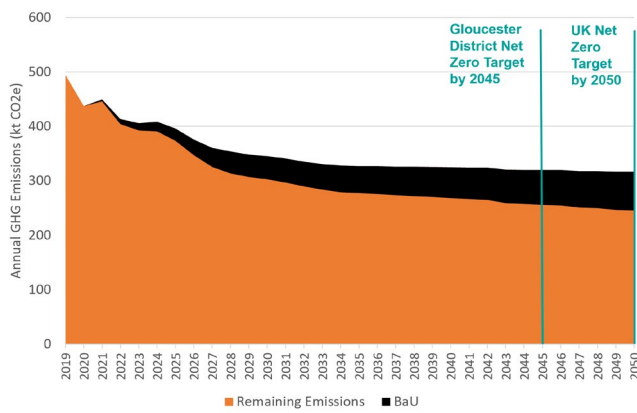


|| Delivering a Net Zero Carbon Gloucester by 2045

The UK's electricity grid is projected to continue to decarbonise as more renewable energy is connected, as reflected in the 'Business-as-Usual' (BaU) scenario. As a result, further electrification will lower emissions, supporting Gloucester District's ambition of achieving net zero emissions by 2045. However, achieving net zero emissions will not be possible without further action.

Figure 3-4 outlines the carbon emissions trajectory for Gloucester District up to 2050. The black area shows the estimated emission reduction on a BaU scenario. The orange area represents remaining emissions after BaU policies have been modelled.

Figure 3-4. Gloucester District BaU Carbon Emissions for 2017-2050. Source: WSP using DESNZ data for Baseline.



The GCCS response to this is set out later in this report (in Section 4. Achieving Net Zero Emissions) which outlines the actions Gloucester stakeholders will take to achieve the district’s net zero emissions target by 2045, in line with the UK’s net zero emissions target by 2050. This approach will focus on reducing remaining emissions (light green areas of the above figures), by installing renewable energy-based heating and cooling systems or encouraging active travel, public transport, and EVs for personal travel and commercial freight.

Part 2 – Gloucester City Council Baseline Emissions

Gloucester City Council (GCC) is working towards net zero for its own operations by 2030. This target is aligned with its net zero target by 2045 for Gloucester District. As a signatory of the Global Covenant of Mayors for Climate & Energy (GCoM), GCC is committed to implement policies and undertake actions to limit greenhouse gas emissions and track progress toward the GCoM objectives.

GCC emissions have been estimated by establishing an organisational boundary based upon operational control. This was identified and validated through collaboration and discussions with the GCC Climate Change and Decarbonisation Lead and council officers, and a review of relevant data sources, activities and assets.

The GHG Protocol’s Corporate Standard was followed to prepare Gloucester City Council’s emissions baseline which has been quantified using a ‘calculation’ approach, whereby data linked to activities (e.g. litres, tonnes, kWh etc.) is taken and converted to a mass value for GHG emissions using supplier specific and UK Government factors.

All scope 1 and 2 emissions from within the organisational boundary have been included as shown in Table 3-1. However, inclusion of scope 3 emissions is based on level of influence and data availability within Gloucester City Council. Assets owned by the council but leased to tenants or operated by third parties, have been excluded from the GHG baseline. Emissions from the operation of Gloucestershire Airport, partially owned by GCC, are referenced in section 4.7 of this GCCS and previously recommended actions to GCC will be delivered as part of the GCCS. It is anticipated that more Scope 3 emission sources will be included in future years as more data become available; Of the 15 categories included in the Scope 3 Guidance of the Greenhouse Gas Protocol, categories 1, 3, 5 and 7 have been estimated as described in the table below. In the future, emissions from downstream assets and investments that are not yet included in scope 1 or scope 2 could be included in future estimates.

Table 3-1. 2021 Gloucester City Council Baseline Carbon Emissions and Assumptions.
Source: WSP

Scope	Category	Description
Scope 1	Gas and Fuel	Direct emissions from company vehicles, generation of electricity and refrigerant gas leaks
Scope 2	Electricity consumption	Purchased electricity for own use
Scope 3	Category 1 – Purchased goods and services	Extraction, production, and transportation of goods and services purchased
Scope 3	Category 3 – Upstream well-to-tank emissions (WTT)	Extraction, refining and transportation of the raw fuel sources prior to their combustion (known as well-to-tank (WTT)).
Scope 3	Category 3 – Transmission and distribution (T&D) losses	Electricity transmission and distribution losses
Scope 3	Category 5 – Waste	Disposal and treatment of waste generated: <ul style="list-style-type: none"> ▶ Waste data was available for 2021-2022 months, this was assumed to be representative of the 2021 reporting year.
Scope 3	Category 5 – Water	Water consumption and treatment: <ul style="list-style-type: none"> ▶ Water data was available for 2021-2022 months, this was assumed to be representative of the 2021 reporting year.
Scope 3	Category 7 – Employee homeworking	Home working: <ul style="list-style-type: none"> ▶ Total number of employees for 2021 provided by GCC; ▶ Assumed 48 working weeks a year (accounting for bank holidays and annual leave); ▶ Assumed 7.5 hours worked per day.
Scope 3	Category 7 – Employee commuting	Employee commuting

|| Gloucester City Council Baseline Emissions 2021

The baseline year of 2021 was identified as the most recent year for which data was available covering the calendar period from January to December. Total carbon dioxide equivalents (CO₂e) emissions in 2021 accounted for 3,381 tCO₂e, as set out in Table 3-2.

Insights from GCC baseline emissions in 2021 are illustrated in Figure 3-5 and Table 3-2 and described below:

- ▶ Scope 1 emissions accounted for 1,816 tCO₂e and represent more than half of all GHG emissions, followed by scope 3 with 28% and scope 2 with 18.3%, as shown in Figure 3-5.
- ▶ The biggest source of emissions is the consumption of gas in non-domestic buildings (37.7%), followed by electricity consumption in non-domestic buildings (18.3%) and fuel consumption by the council’s vehicle fleet depot (16%).
- ▶ For scope 3 emissions, well-to-tank emissions (WTT) are from the extraction, refining and transportation of the fuel consumed by the council’s operations, this will be reduced as electricity, gas, and fuel consumption decreases.
- ▶ Decarbonisation of the electricity grid by 2030 (and further by 2050) means that emissions will reduce on their own as has already occurred in recent years. However, energy efficiency measures will need to continue to achieve net zero by 2030, by reducing the amount of energy needed by households and businesses, they will also reduce energy bills. These energy efficiency measures include the installation of triple glazing, cavity wall, insulation and energy saving light bulbs.

Figure 3-5. Gloucester City Council Carbon Emissions 2021 Breakdown per Scope and Categories.
Source: WSP

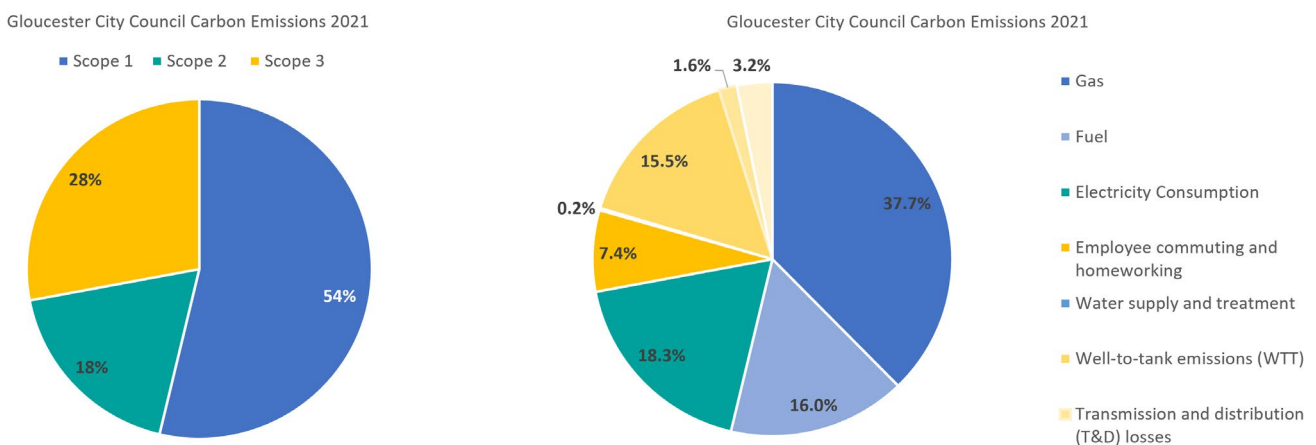


Table 3-2. Outline of GCC Operational Carbon Emissions in 2021. Source: WSP

Reporting Area	Category	2021 Total (tCO2e) (Location Based)	2021 Total (tCO2e) (Market Based)	Totals (tCO2e)
Scope 1	Gas	1,274	1,274	1,816
Scope 1	Fuel	542	542	
Scope 2	Electricity Consumption	620	1,025	620
Scope 3	Employee commuting and homeworking	251	251	868
Scope 3	Water supply and treatment	7	7	
Scope 3	Upstream well-to-tank emissions (WTT)	525	525	
Scope 3	Transmission and distribution (T&D) losses	55	55	
Scope 3	Waste	108	108	
Total		3,381	3,787	3,381

Note: Decimal number rounded to the nearest whole number.

|| Delivering a Net Zero Carbon Gloucester City Council by 2030

For GCC, net zero by 2030 means limiting the use of fossil fuel across all scopes:

Scope 1:

Heating buildings, ensuring council-owned buildings such as offices, are designed or retrofitted to be low-carbon;

Scope 2:

Electricity use in the council is an important source of emissions, as the grid decarbonises the council can adopt energy efficiency and renewable energy technologies;

Scope 3:

employee commuting, fostering a transition to sustainable transport modes; and

Scope 3:

Influence on the supply chain by requiring their suppliers and contractors to be working towards net zero, for example through sustainable procurement policy.

3.2. Adaptation – Understanding Vulnerability to Climate Change

Climate Risk and Vulnerability Assessment (CRVA)

GCC is aiming for net zero by 2030, and also to create a city that is resilient to climate change impacts. The nature and extent of potential climate change risks and areas of vulnerability for Gloucester have been identified in a Climate Risk and Vulnerability Assessment (CRVA). The assessment was conducted through investigating potential climate hazards, such as heatwaves or storms, the subsequent risks to the city and its community that may occur as a result of those hazards, and existing protections against those risks and hazards. However, the changing climate not only poses risks to the city, its residents and the organisations and businesses that call it home, but also provides opportunities; such as enhancing biodiversity and landscaping, improving health and wellbeing, and providing business opportunities and cost savings through reduced heating bills.

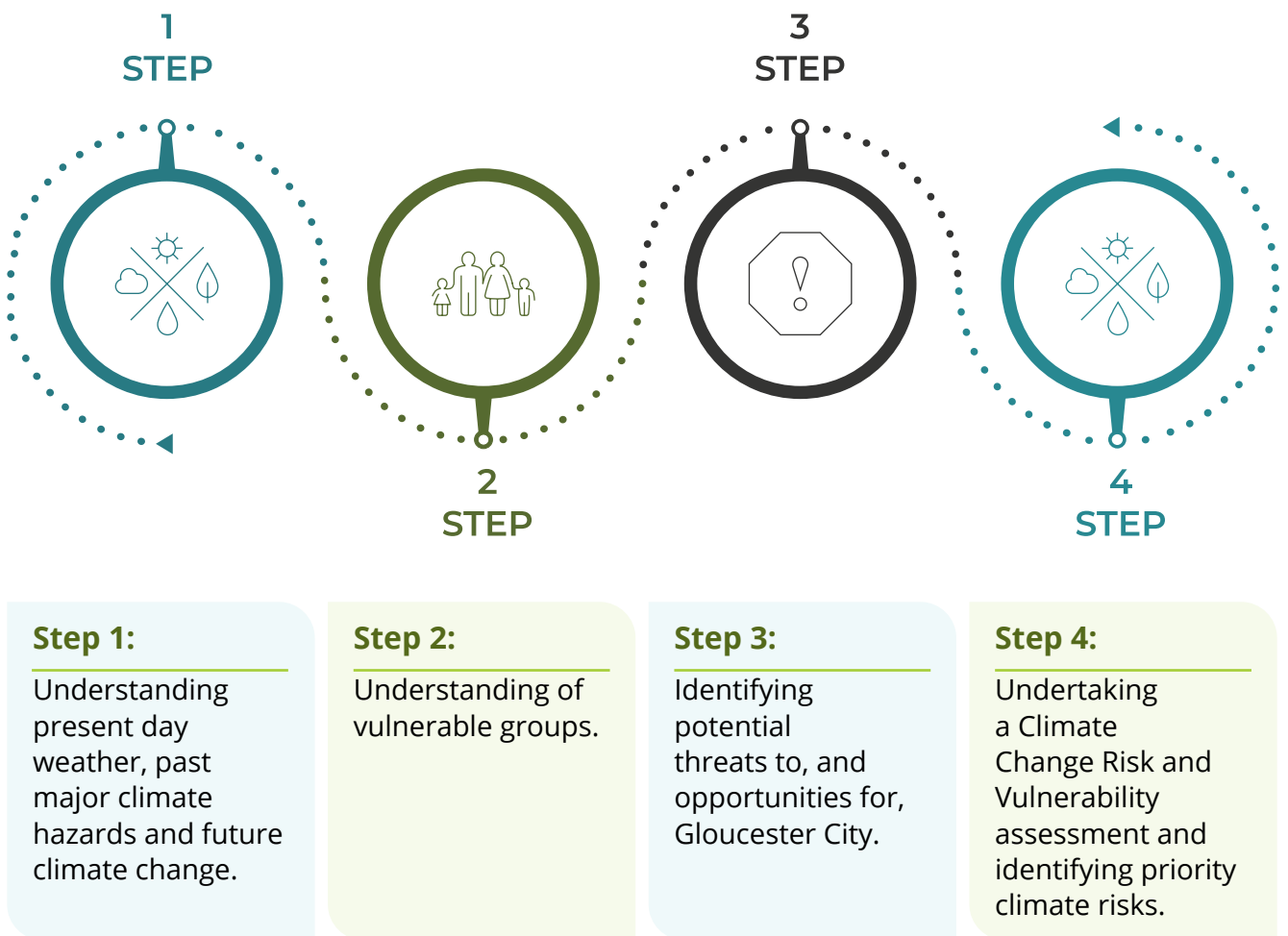
The assessment was undertaken using the latest UK Climate Projections information and indicators (Met Office, 2022) (Arnell, 2021). The risks and opportunities were rated as low, medium, high and very high; in line with the corporate risk matrix and GCoM reporting standards. This was assessed based on the likelihood of the climate hazard occurring and, should the climate hazard occur, what would the impact or disruption look like. The risks and opportunities were grouped into the six themes as outlined in Table 3-3 below.

Table 3-3. Themes and Scope of Council Services* within the Climate Risk and Vulnerability Assessment. Source: WSP

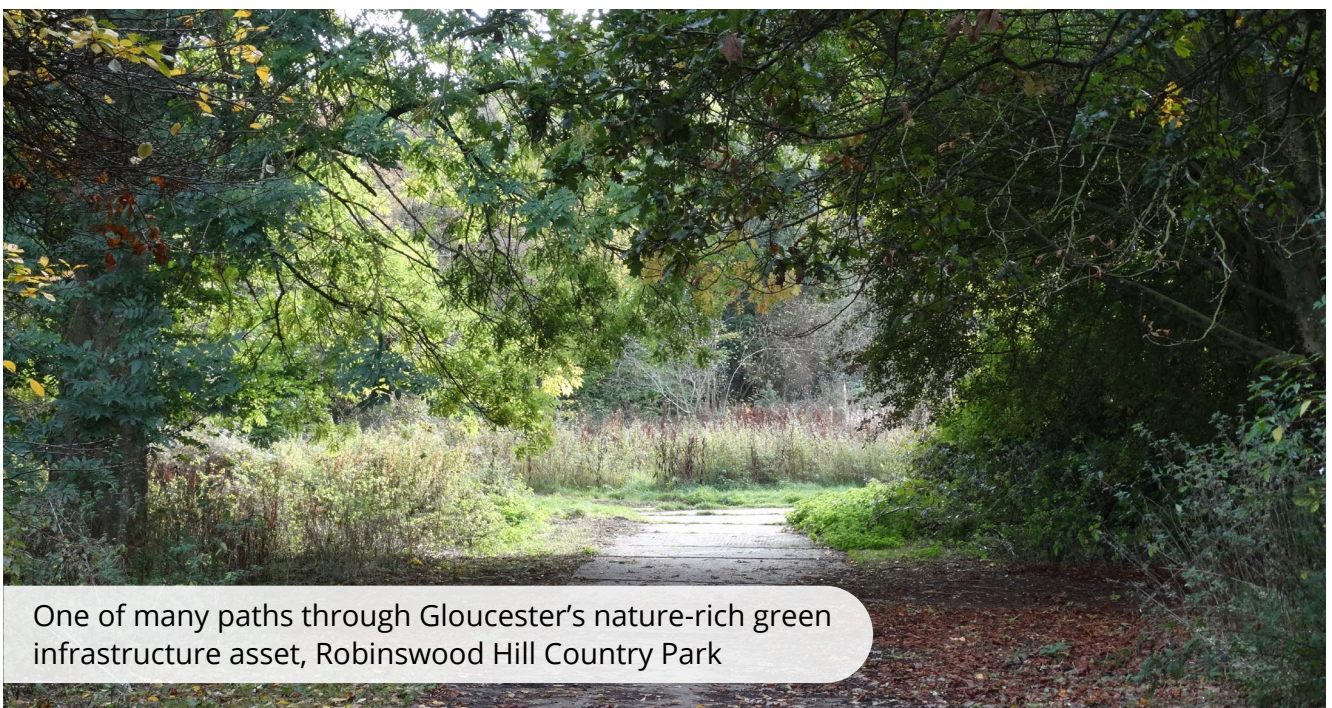
CCRA3 sectors	Theme	Services
Health and Social Care	Community Wellbeing	Safety and crime, health and wellbeing, homelessness, employment, children/young people, cemeteries, and crematoriums.
Energy, Telecoms and ICT, Transport	Infrastructure (IT, transport, energy)	IT, Transport (parking and roads) and energy
Agriculture and Food	Biodiversity and Environment	Agriculture and green and blue infrastructure
Housing, Business	Housing and Buildings	Corporate and commercial buildings
Water	Waste and Water	Waste, wastewater, bin collections, recycling, and water supply
Business, Cultural Heritage	Culture Leisure and Tourism	Farmers / craft / food markets, museums, heritage sites and assets, theatres, sports facilities, playgrounds, and tourism

*Gloucestershire airport is not included within the CRVA assessment. The CRVA methodology assesses the local authority area, and the airport falls outside of this region. Additionally, as the airport is an investment for GCC, it falls outside the services provided by the council and thus climate risks to the airport will not impact upon the functioning of the council.

Figure 3-6. The Process of the Climate Risk and Vulnerability Assessment. Source: WSP



Section 5 details further the process and outcomes of the CRVA.



4. Mitigation – Achieving Net Zero Emissions

This section describes the pathway to net zero for Gloucester District and Gloucester City Council, recognising that these are two separate but interrelated pathways. It also covers areas of opportunity for decarbonisation and actions organised around themes of energy, transport, waste and biodiversity.

4.1. Gloucester District Pathway to Net Zero by 2045

To identify a pathway to net zero by 2045 for Gloucester District, the GHG reduction analysis was divided into five areas of opportunities for decarbonisation as described in Figure 4-1 below. Related to this a set of actions has been identified for stakeholders in Gloucester District to implement to achieve the net zero target.

Figure 4-1. Gloucester District areas of opportunity for decarbonisation. Source: WSP

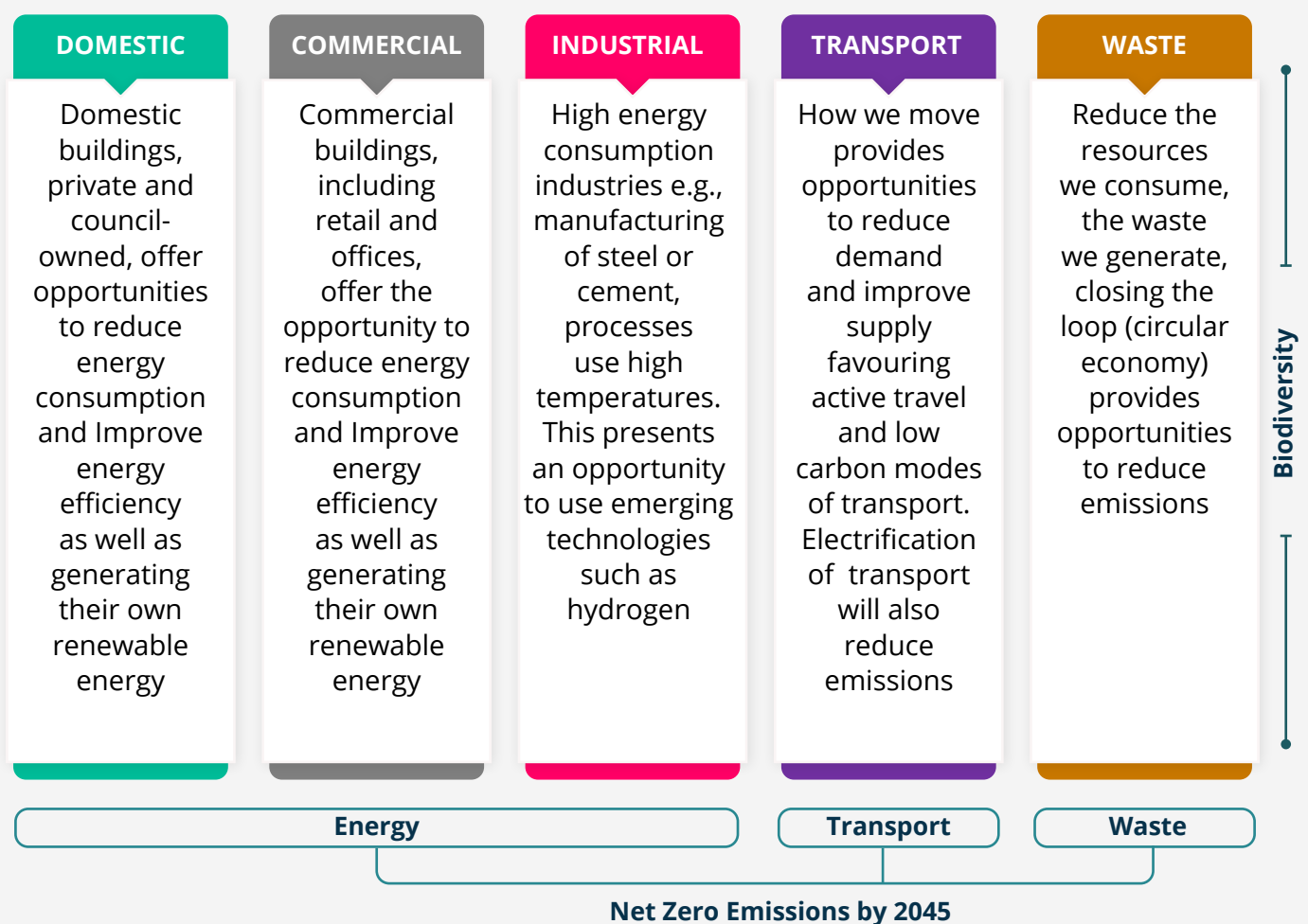
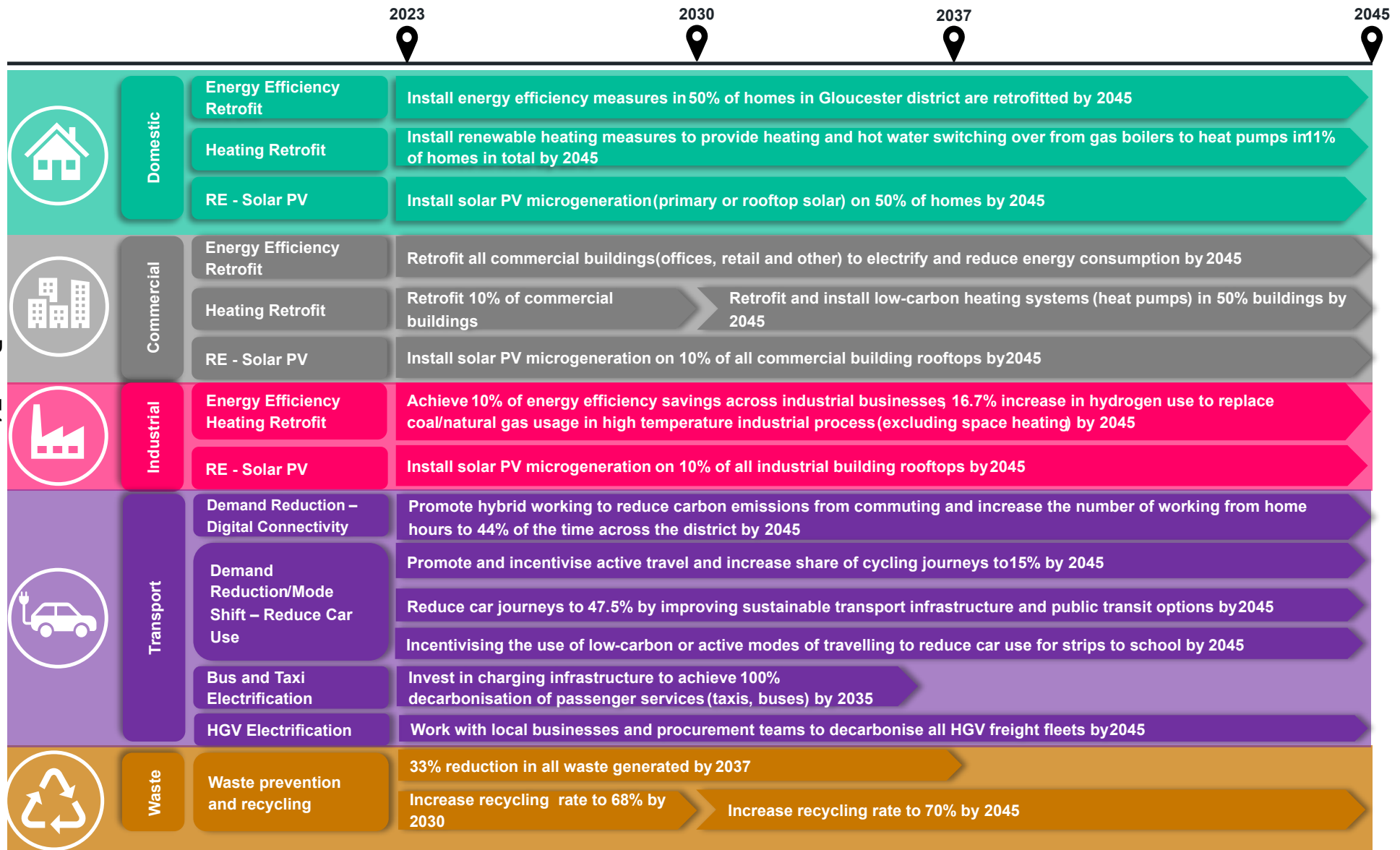


Figure 4-2 presents the actions Gloucester District can take to achieve net zero emissions by 2045, and timeline for delivering decarbonisation across the areas of opportunity. For a detailed breakdown of each action, key stakeholders and potential steps for implementation see Appendix – A – Gloucester District Climate Change Mitigation Actions.

Figure 4-2. Gloucester District roadmap to net zero emissions by 2045. Source: WSP



A short description of each action included in Gloucester District roadmap to net zero emissions by 2045 has been included in the table below as an introduction to Appendix – A.

Table 4-1. High-level description of Gloucester District Mitigation Actions. Source: WSP

Domestic energy efficiency retrofit	Installing energy efficiency measures (where not already present) in half of existing local authority owned dwellings, socially rented and private rented and owned dwellings. The installation of specific measures includes smart meters, smart thermostats, cavity and solid wall insulation, loft insulation, double glazing and other water saving measures, alongside behaviour change. Modelling considers that not all measures will be needed or can be installed in dwellings, a multi-measure approach tailored to each home is suggested.
Domestic heating retrofit	The aim is to achieve heating system retrofits in 11% of homes by 2045 (where not already present). Heat pumps are the low-carbon technology with the highest decarbonisation potential for heating. The modelling assumes the deployment trajectory modelled in the Sixth Carbon Budget report. This trajectory is based on a ban on gas boilers in 2033, and other fuels in 2028, with most installations of heat pumps taking place after 2031. However, central government has introduced an exemption on to the phase out of fossil fuel boilers, including gas, in 2035 for homes struggling to make the switch. While the Boiler Upgrade Grant for households has been increased by 50%.
Domestic solar PV	Installing solar PV in 50% of homes by 2045 can significantly reduce the demand of electricity from the network. Technology is already mature with electricity generation in the short term. A conservative capacity factor of 9.7%, which represents the energy yield of a technology, was employed in the modelling.
Commercial energy efficiency retrofit	The installation of energy efficiency measures in all commercial buildings (where not already present) models the carbon savings from the installation of a range of measures, including building fabric, building controls, energy management systems, lighting installation or building services distribution systems. Their abatement potential has been modelled using BEIS' Building Energy Efficiency Survey.
Commercial heating retrofit	Installing heating system retrofits in 50% of properties by 2045, in line with the equivalent domestic action. Achieving 10% of installations by 2030. This action requires replacing the fossil fuels (natural gas and oil) used for space heating and hot water in retail, offices, hospitality and other commercial buildings.
Commercial solar PV	Installing solar PV in 10% of commercial building rooftops by 2045 (where not already present), would require feasibility and investment to be achieved. However, PVs are a mature and cost-effective technology that provides opportunities to reduce carbon emissions. A conservative capacity factor of 9.7%, which represents the energy yield of a technology, was employed in the modelling.

Industrial energy efficiency and fuel switching	Installing measures in industrial businesses to achieve 10% of energy efficiency measures and 16.7% increase in hydrogen use as alternative to fossil fuels. The 10% energy efficiency savings is an average saving across multiple sectors, including chemicals and food and drinks. The energy efficiency was based on the BEIS Industrial Decarbonisation and Energy Efficiency Roadmaps, carried out by WSP and DNV-GL. Research for the CCC identified that, processes in which hydrogen can play a role are approximately 16.7% (on an energy basis).
Industrial solar PV	Installing solar PV in 10% of industrial buildings by 2045 can significantly reduce the demand of electricity from the network and associated carbon emissions. CCC projections for rooftop solar PV potential by 2050 on a national scale were used to estimate the technically feasible for the industrial sector. Similar to commercial and domestic, a conservative capacity factor of 9.7% was used in the modelling.
Demand Reduction - Digital Connectivity	Promoting hybrid working for people with options to work from home can reduce carbon emissions from commuting. It has been estimated that 44% of the time across the district by 2045, would be feasible based on current arrangements by UK employers requiring 2-3 days to be in the workplace. As the Sixth Carbon Budget Surface Transport report considers, improvements to IT and network connectivity would have to be in place to facilitate the implementation of this action.
Demand Reduction/ Mode Shift – Reduce Car Use	Reducing demand for car travel requires a modal shift towards active travel and public transport, combined with the provision of infrastructure and the introduction of policy measures. The Sixth Carbon Budget Surface Transport report assumes that 14% of journeys can be shifted to active travel (walking and cycling), we have adopted 15% for Gloucester, considering its urban setting. Furthermore, the CCC estimates 34% of car trips could be reduced, with the inclusion of a shift to public transport. Considering Gloucester’s current car dependency and potential for active travel, it has been assumed a 47.5% by improving sustainable transport infrastructure and public transit options by 2045. This also considers a reduction in the use of cars for schools’ trips.
Bus, Taxi and HGV/ HDV (Heavy Duty Vehicle) Electrification	<p>Investing in charging infrastructure to achieve 100% decarbonisation of passenger services (taxis, buses) by 2035. The Sixth Carbon Budget assumes Electric vehicle (EV) technology is developing quickly and they expect uptake of BEVs to grow to between 90-100% of new sales by 2030. However, this could change as the ban on the sale of petrol and diesel vehicles is moved to 2035. The GCCS modelling adopts the CCC’s projected pace of public charging infrastructure required in towns and cities as well as long-distance travel.</p> <p>The Sixth Carbon Budget states that decarbonisation of the transport sector will require widespread uptake of zero emission HDVs by 2040 to enable almost full decarbonisation of the fleet by 2050.</p>

<p>Waste prevention and recycling</p>	<p>Reducing waste tonnage by 33% by 2037 compared to 2019 levels and increase recycling to 68% by 2030 achieving 70% by 2045. These targets are aligned with the Sixth Carbon Budget Waste report recommendations; however, these would require significant behaviour changes, with the recycling of commercial and industry waste having the highest potential.</p>
<p>Biodiversity</p>	<p>To safeguard and create green spaces that enhance biodiversity, facilitate active travel, link neighbourhoods, and protect communities from the impacts of the climate crisis.</p> <p>Gloucester City Council's Open Space Strategy (2020-2025) sets out key biodiversity objectives. The council will support Gloucestershire County Council commitment to planting one million trees by 2030.</p>



The impact of the implementation of actions illustrated in Figure 4-2 on Gloucester District baseline emissions is presented in Figure 4-3.

While business-as-Usual (BAU) policies achieve the greatest decarbonisation, which include policies such as transport electrification, including ICE sale ban, that will impact the district, the domestic sector offers the highest decarbonisation potential. This is due to its high consumption of gas for heating and potential decarbonisation through the installation of heat pumps and low carbon heating technologies.

Figure 4-3. Gloucester District Emissions 2019-2050 Graph with actions associated with five identified areas of opportunity. Source: WSP

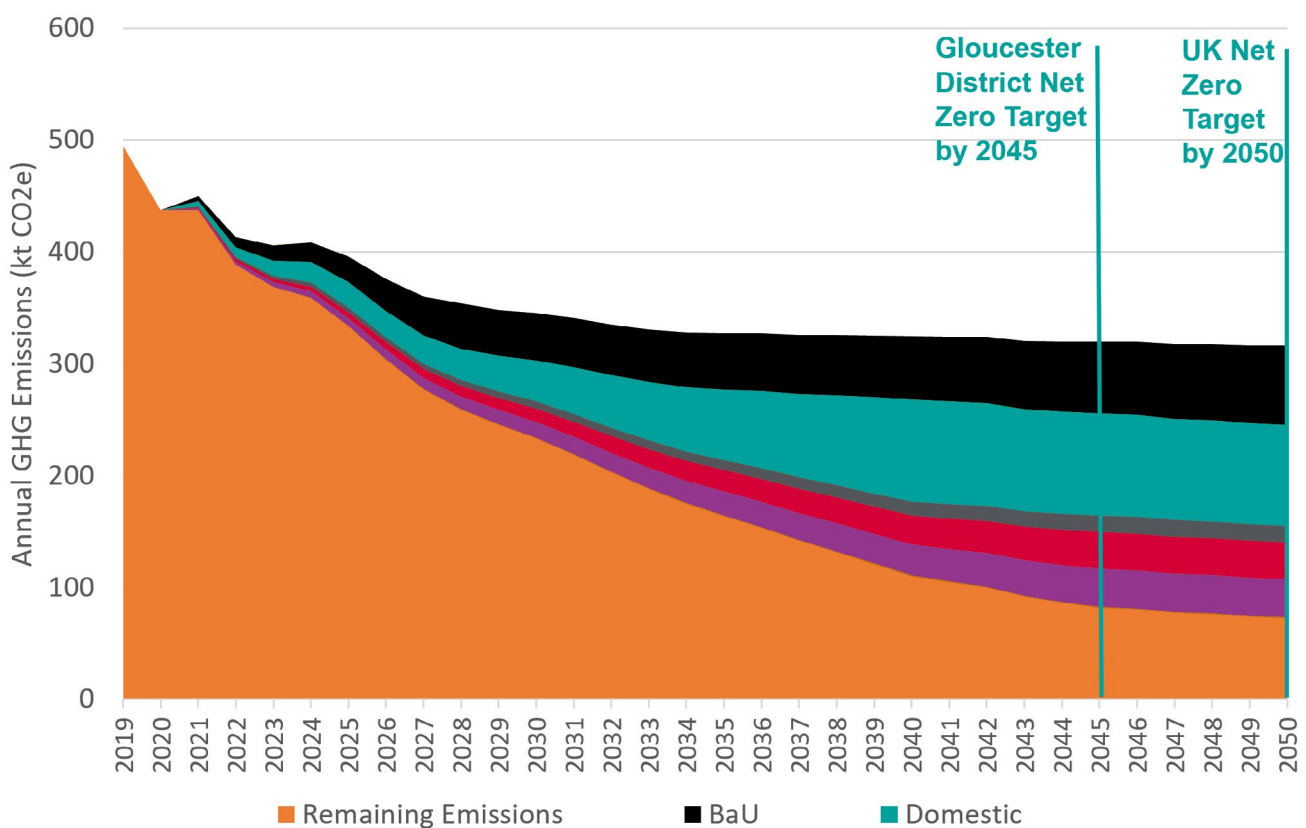


Figure 4-5 illustrates the avoided emissions in Gloucester District in 2045 from the implementation of actions included in the GCCS. Baseline emissions are for the year 2019, as described in section 3.1 to measure progress towards net zero by 2045, the cumulative impact of actions would realise a 76.34% reduction on 2019 GHG emissions levels by 2045.

Residual emissions, shown in Figure 4-5 as total remaining emissions, represents the remaining 23.76% of GHG emissions (128.30 ktCO₂e) in Gloucester District. These will have to be removed or offset to achieve net zero emissions by 2045. Following advice from Science Based Targets Initiative, offsets should not be used for more than 10% of Gloucester’s emissions: As growth is anticipated in the Gloucester City Plan 2011-2031 an up to 2045, the modelling considers commercial growth as well as additional homes anticipated to be built between 2023-2045.

Figure 4-4. Carbon reduction hierarchy. Source: Columbia University

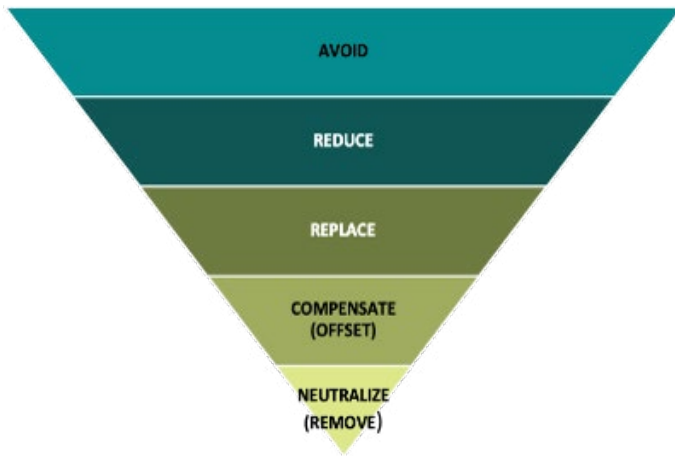
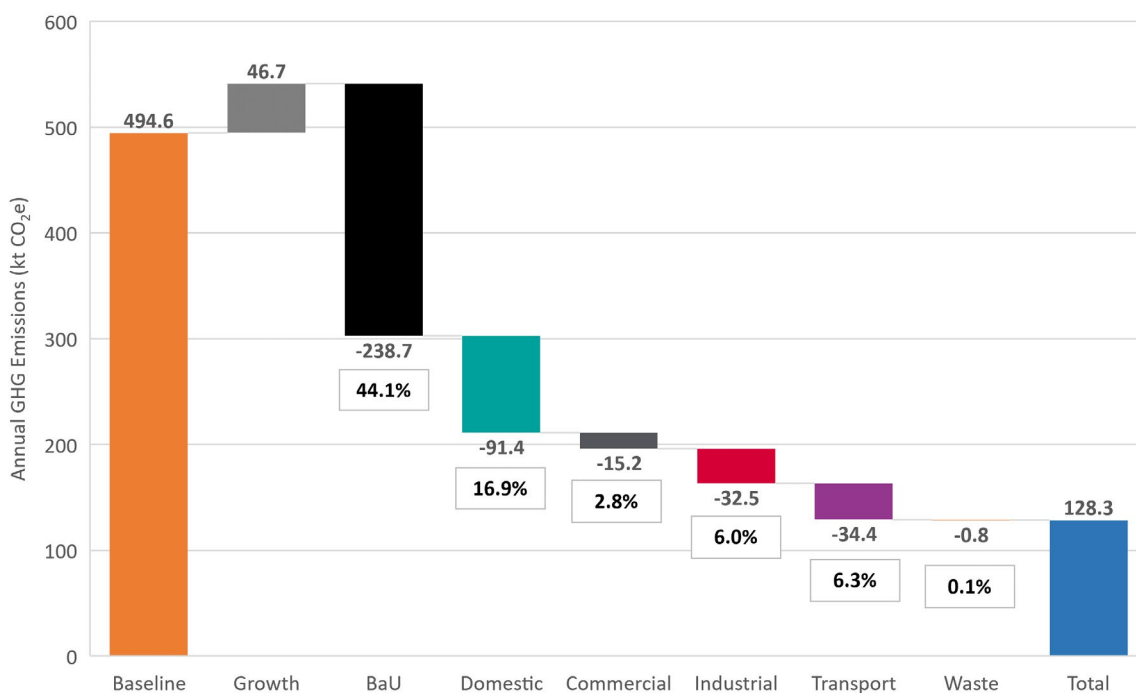


Figure 4-5. Gloucester District emissions 2045 waterfall chart with actions associated with the five identified areas of opportunity. Source: WSP



Carbon removal methods include natural strategies like tree restoration and agricultural soil management; as well as high-tech strategies like direct air capture and enhanced mineralization; and hybrid strategies like enhanced root crops, bioenergy with carbon capture and storage.

Carbon offsets involve compensating for residual emissions and involves the exchange of credits within voluntary markets. A carbon credit is a token representing the avoidance or removal of greenhouse gas emissions, measured in tonnes of carbon dioxide equivalent (tCO₂e). To achieve its net zero target at the current UK market rate (2023) of approximately £40/tCO₂, it will cost Gloucester District £5.20m to offset remaining emissions at current prices. It should be noted that high quality carbon offsets are set to increase to approximately £160/tCO₂ in 2050, increasing offset prices for Gloucester four-fold to an estimated £20.5m.

4.2. Gloucester City Council Pathway to Net Zero by 2030

To meet its net zero aspirations GCC has identified four areas of opportunities for decarbonisation as described in Figure 4-6, each with an associated set of actions as set out in Figure 4-7. These opportunities have been identified from the key emitting categories from GCC baseline emissions in 2021, as described in section 3.1, which included gas and electricity in buildings and fuel consumed by GCC’s vehicle fleet.

Figure 4-6. Gloucester City Council areas of opportunity for decarbonisation. Source: WSP

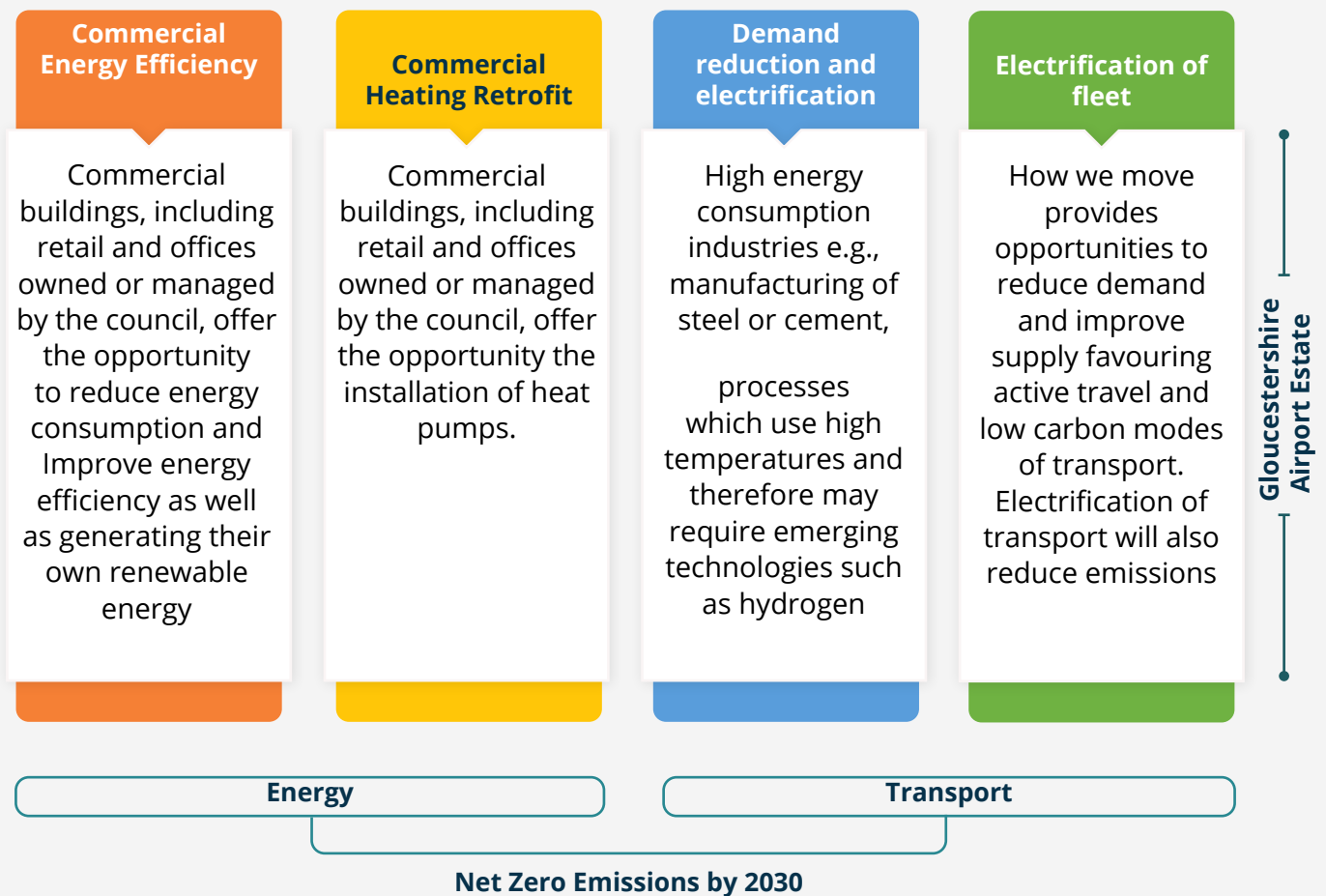
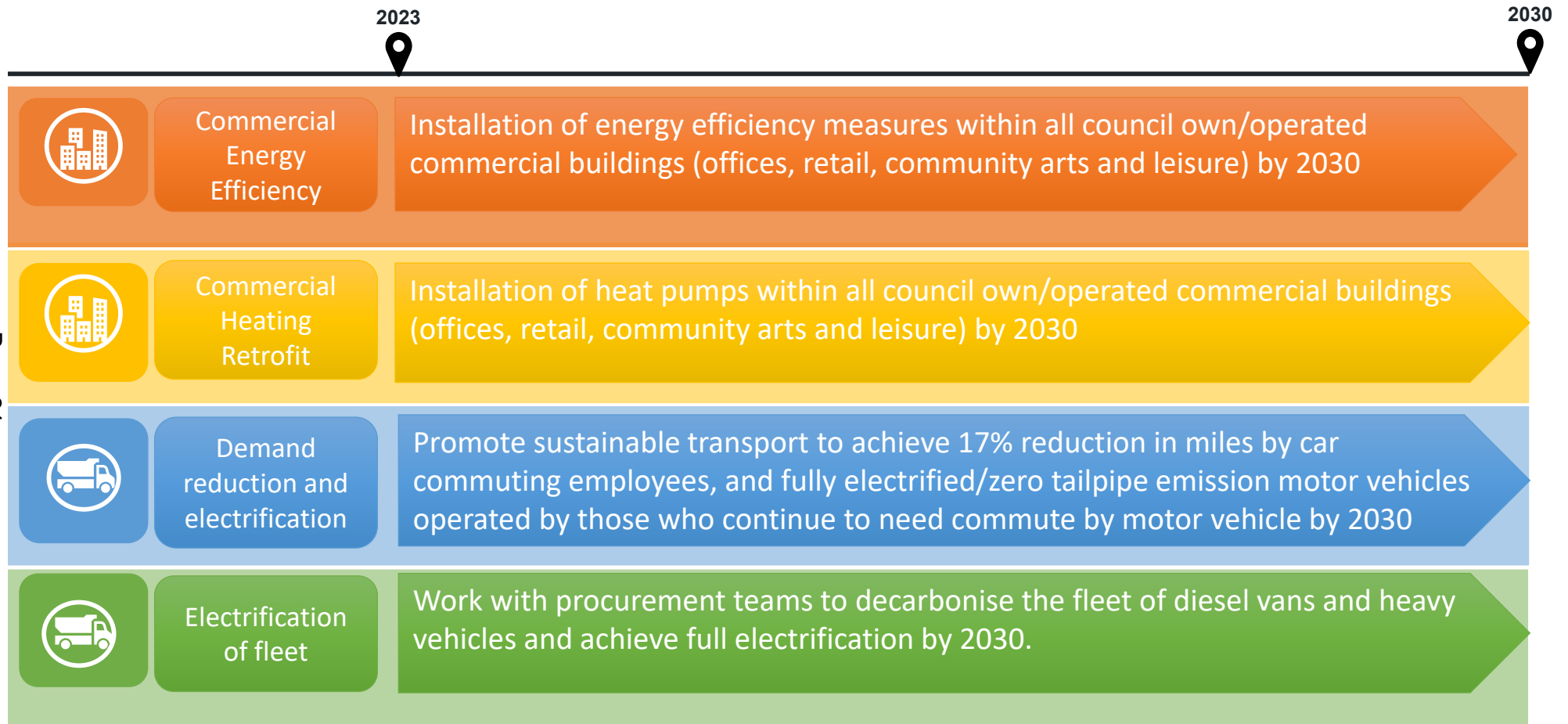


Figure 4-7. Gloucester City Council actions to net zero by 2030. Source: WSP



The net zero pathway set out in Figure 4-8 is based on existing technologies, and as such decarbonisation measures rely on the electrification and the decarbonisation of the grid, which achieves the greatest reduction from 2021 levels.

In addition to savings from grid decarbonisation, the installation of energy efficiency measures in commercial buildings achieves the greatest savings as shown in Figure 4-8. These include the following uses: community, arts and leisure, offices, retail, hospitality, and storage facilities.

Gas consumption in commercial buildings is almost three times that of electricity, which is mostly for space heating. Therefore, the installation of heat pumps will deliver substantial savings followed by the electrification of waste depot fleet, focused on diesel vans and HGVs which make up the majority of council vehicles.

Figure 4-8. Gloucester City Council Emissions 2021-2030 Source: WSP

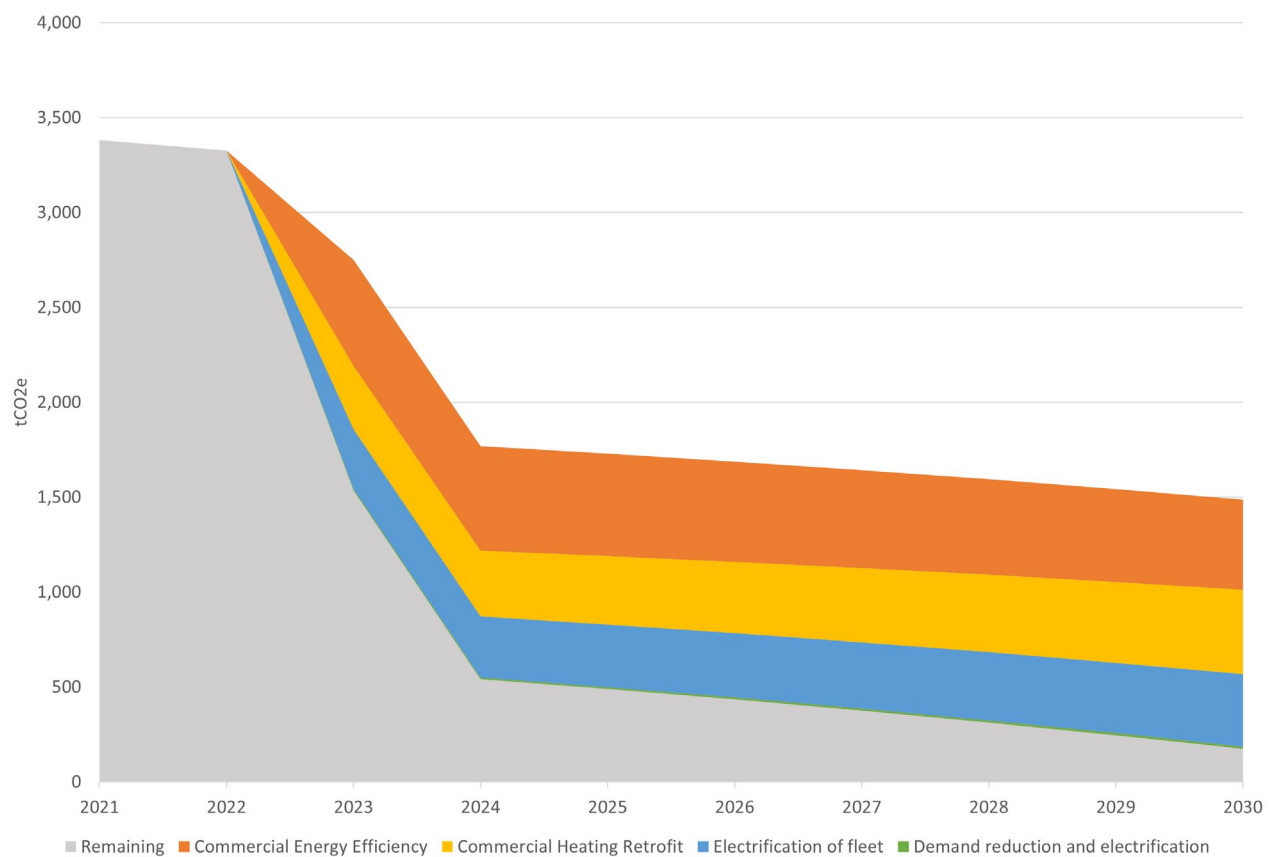
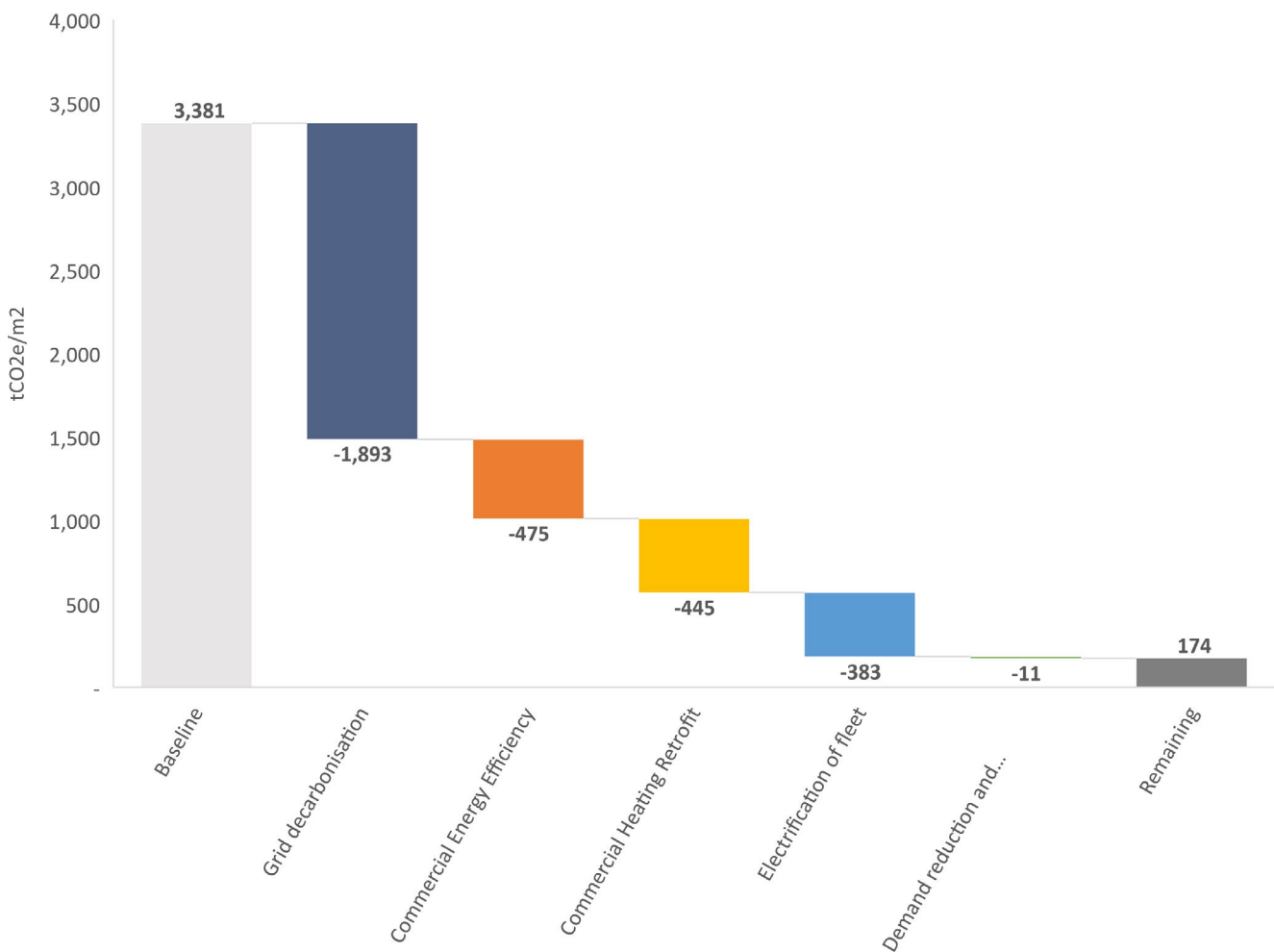


Figure 4-9 illustrates the avoided emissions in GCC’s own functions in year 2030 from the implementation of actions included in the GCCS. Baseline emissions are for the year 2021, as described in section 3.1 to measure progress towards net zero by 2030. The implementation of these actions would realise a 95% reduction on 2021 GHG emissions levels by 2030. The 5% remaining emissions will need to be removed or offset by 2030 as recommended for Gloucester District.

Figure 4-9. Gloucester City Council emissions 2030 with actions. Source: WSP



Section 4.3 outlines opportunity areas for decarbonisation for both Gloucester District and GCC’s own operations. Since the net zero goals are interrelated and would require the participation of various stakeholders, the actions for the district and GCC are presented together for each opportunity area. Similarly, the evidence used to inform the net zero pathways for the district and the GCC is the same, including central government policy as well as advice from the Climate Change Committee (CCC), city research and peer journals that are relevant to Gloucester District and GCC.



4.3. Area of Opportunity for Action: Energy

|| Aim

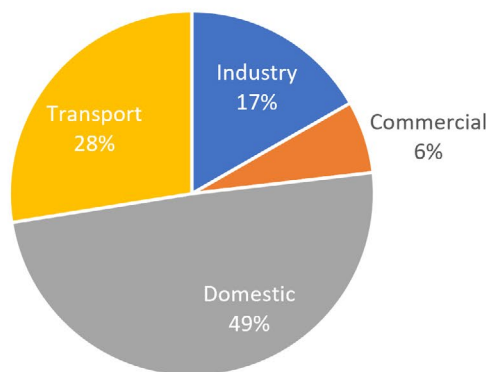
Promote energy efficiency, reduce energy consumption, decarbonise heating and increase renewable energy generation in domestic, industrial, and commercial properties in Gloucester District and Gloucester City Council.

|| Energy in Gloucester

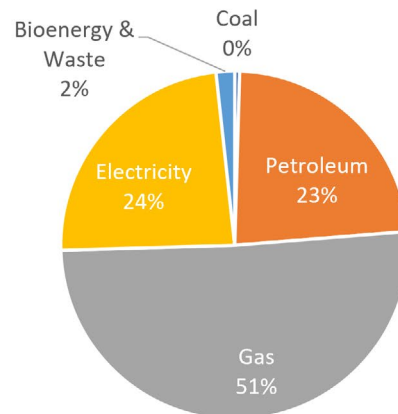
In 2019, Gloucester’s households, businesses and organisations consumed 2,288.784kWh in energy. At least 80% of the energy used is from fossil fuel, with almost half of all energy consumption from natural gas. The domestic sector consumed the most energy, followed by industry and transport.

Figure 4-10. Gloucester’s Energy Consumption in 2019 by sector and fuel.
Source: WSP with data from DESNZ.

Energy Consumption - 2019 Sector Breakdown (kWh)



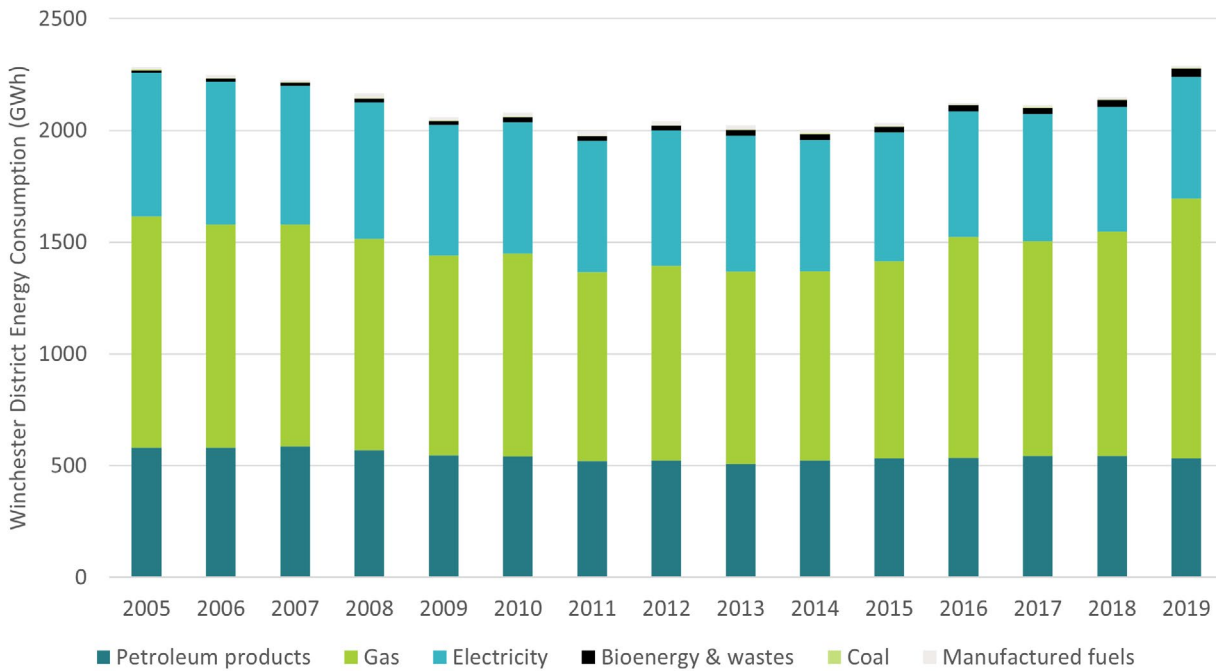
Energy Consumption - 2019 Fuel Breakdown



Sector Category	Energy consumption (kwh)	Percentage
Industry	279.4	29%
Commercial	107.1	13%
Domestic	823.4	34%
Transport	459.4	24%

Carbon emissions in Gloucester have reduced since 2005, however energy consumption, has fluctuated over the period from 2005-2019, reducing in early 2010s and increasing in 2019 to return to 2005 levels. Carbon emissions have reduced as a result of decarbonisation of the energy grid, and energy efficiency improvements in buildings as well as a decrease in consumption of coal (50%), manufactured fuels (20%), electricity (15%), and petroleum products (8%) since 2005.

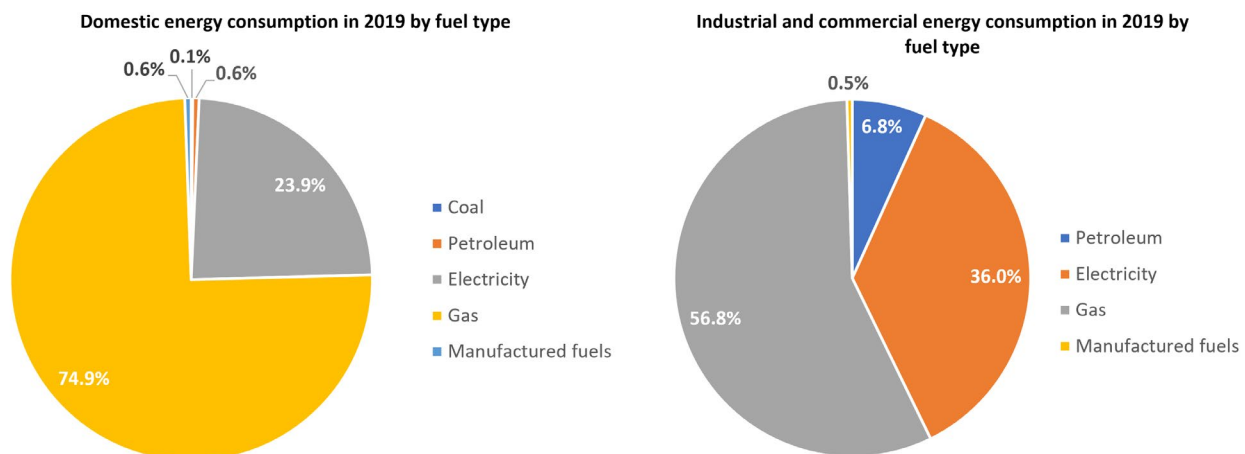
Figure 4-11. Annual Gloucester District Carbon Emissions 2005-2019.
Source: WSP with data from DESNZ



Energy in Domestic Buildings

In the domestic sector, gas consumption represents 74.9% of fuel consumption followed by electricity (23.9%), as set out in Figure 4-12. Gas use is mostly for space and water heating, which can be reduced through a combination of energy efficiency measures and low-carbon heat. In 2021, more than half of homes in Gloucester have an Energy Performance Certificate (EPC) rating below C. However, there is potential to influence behavioural change, from planning and design to building net zero homes, in line with the Future Homes Standards, with no boilers installed, as well as the generation of energy from renewable energy sources, for example for solar PV.

Figure 4-12. Domestic, Industrial and Commercial Annual Carbon Dioxide Emissions Splits for Gloucester District in 2019. Source: WSP with data from DESNZ



As part of the actions to achieve net zero, Gloucester District aims to reduce domestic sector emissions by installing energy efficiency measures, heating retrofit and solar PV in homes where these measures are not already implemented.

Gloucester District

Install energy efficiency measures in 50% of homes in Gloucester district are retrofitted by 2045.

Gloucester District

Install renewable heating measures to provide heating and hot water switching over from gas boilers to heat pumps in 11% of homes in total by 2045.

Gloucester District

Install solar PV microgeneration (primary or rooftop solar) on 50% of homes by 2045.

**Case Study:
The Warm and Well Advice Line**



The Warm and Well advice line provides free, impartial, and local home energy advice to households in Gloucestershire. The scheme has been running since 2001. Skilled energy advisers help residents and businesses with a range of issues; from providing advice about simple measures in the house to improve energy efficiency to how to access home improvement grants, such as the Energy Company Obligation (ECO).

It also carries out Green Deal Assessments, including a full technical survey, to produce and EPC certificate. This full assessment looks at fuel bills and energy usage to assess the likely impact of any improvements. The scheme also directs people to a free-to-use online database that can connect residents and businesses with local sustainable energy installers and tradespeople.

For local residents earning less than £31,000 who own or rent an inefficient property the scheme can also provide fully funded insulation and low carbon heating. It has helped to install over 60,000 energy efficiency measures. For more information, Well and Warm have documented some case studies of their work.

|| Energy in Commercial and Industrial Buildings

Commercial and industry sectors consume almost 43% of energy in Gloucester (see Figure 4-10) and make a major contribution to carbon emissions. Therefore, there is a great potential to engage with businesses to reduce energy usage and carbon footprint. Commercial properties can include retail, offices, hospitality, and other non-domestic buildings.

There is a specific opportunity to improve building energy performance and energy efficiency in commercial buildings owned by, or operated on behalf of, the council to be used as an example of decarbonisation. Similarly, there is the potential to use planning as a means to work closely with businesses to integrate carbon and energy best practices in existing building stock and in new builds.

GCC aims to work closely with local businesses in the district and property managers to install energy efficiency, heating and solar PV measures on commercial and industrial buildings that can benefit from these measures and collaboratively reduce carbon emissions.

The Royal Institute of British Architects (RIBA) has developed an approach to help architects design within a climate conscious trajectory. Its 2030 Climate Challenge provides a stepped approach towards reaching net zero as well as individual targets for embodied and operational carbon, which GCC could use to inform the review of commercial planning applications.

Gloucester District

Retrofit all commercial buildings to electrify and reduce energy consumption by 2045.

Gloucester District

Retrofit and install heat pumps in 50% buildings by 2045.

Gloucester District

Install solar PV on 10% of all commercial building rooftops by 2045.

Gloucester District

Achieve 10% of energy efficiency savings and 16.7% increase in hydrogen use by 2045.

Gloucester District

Install solar PV on 10% of all industrial building rooftops by 2045.

Gloucester City Council

Installation of energy efficiency measures within all council own/operated commercial buildings by 2030.

Gloucester City Council

Installation of heat pumps within all council own/operated commercial buildings (offices, retail, community arts and leisure) by 2030.



Case Study: Working with Business to Reduce Commercial Energy Consumption

[Suntory Beverage & Food BG&I](#) developed a case study for small and medium sized independent convenience stores to implement energy efficiency measures. Cost, time, and uncertainty of where to begin were the key barriers for these businesses. After assessing a Premier in Derbyshire, a range of energy efficiency measures were implemented. These included the installation of LED lighting, replacing old chillers and updating electrical appliances. Recycling initiatives and point-of-sale sustainability measures were used to inspire behaviour change. New stock management practices were adopted to limit van driving hours.

The Energy Saving Trust worked with the store owner to support project management, energy monitoring activities, energy awareness guidance and advice on sustainability and efficiency interventions. After the interventions, the store saved £600 a year – nationwide this could reflect a £28.3m saving for independent convenience retailers. There was also a 12% reduction in electricity consumption. The project highlighted that even small, low-cost interventions can produce positive outcomes.

The Better Buildings Initiative (U.S. Department of Energy) has also produced resource toolkit: [Making the Business Case for Energy Efficiency in Commercial Buildings](#). Cambridge University have also approached this in an academic context: [Potential Barriers to Improving Energy Efficiency in Commercial Buildings: The Case of Supermarket Refrigeration](#).

4.4. Area of Opportunity for Action: Transport

|| Aim

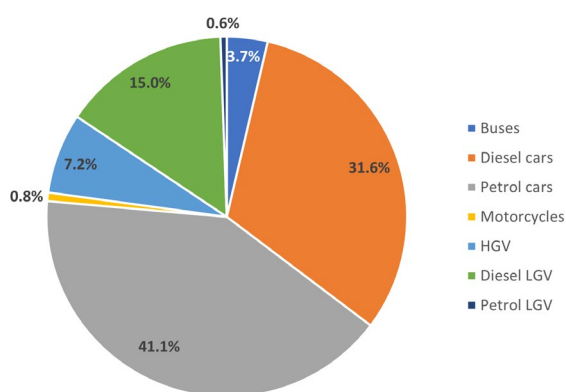
Promote sustainable practices; work with the Local Highways Authority on demand-side measures for reducing excess private motor vehicle use, and deliver demand-side policies within the Council's own powers, such as the recently adopted hybrid working policy; enable the electrification of transport at both the corporate and private level; support walking, cycling and improvements to public and multi-modal transport in Gloucester District and within Gloucester City Council.

|| Transport in Gloucester

Gloucester is one of Gloucestershire's major urban areas and main economic hub concentrating employment, education, training, and services opportunities for citizens across the county. The district is a net importer of labour, with the workday population rising as a result of in-commuting. Despite offering sustainable travel options, car use continues to be the dominant mode of transport. Continued pressure on the transport network results in delayed journey times and congestion with impacts on public health and wellbeing.

To achieve net zero emissions in Gloucester District and across Gloucester City Council's functions, it is important to reduce tailpipe emissions to near zero. In 2019 (see Figure 4-13), more than 70% of road transport energy consumption was from fossil fuelled passenger cars (diesel and petrol), followed by fossil fuel light good vehicles (LGVs petrol and diesel) with 18%, and heavy good vehicles (HGVs) with 7.2%. Buses and motorcycles have a minor contribution with 3.7% and 0.6% respectively. Therefore, Gloucester District stakeholders will need to work collectively to shift the way people travel, reducing demand for car travel, and decarbonising transport through technological changes.

Figure 4-13. Gloucester District Transport Emissions breakdown in 2019.



The GCCS is aligned with Gloucestershire's Local Transport Plan 2020 – 2041 which sets out the policy areas to reduce tailpipe emissions and objectives as described in Figure 4-14. It defines 'Connecting Places Strategy' areas, the CPS1 - Central Severn Vale includes Cheltenham and Gloucester. Priorities include to complete a strategic cycle route between Gloucester, Cheltenham, and Bishop's Cleeve, increase rail service frequencies and improved journey times to support the expansion of the MetroWest network to Gloucester, provide multi-mode interchanges hubs with sustainable links to key residential and employment areas for onward travel by bus, bicycle or on foot.

Figure 4-14. Gloucestershire's Local Transport Plan 2020 – 2041 objectives. Source: Gloucestershire County Council

LTP Objectives	
Protect and enhance the natural & built environment	Support sustainable economic growth
Enable safe and affordable community connectivity	Improve community health and wellbeing and promote equality of opportunity

|| Demand Reduction and Modal Shift

In 2021, 92% of passenger kilometres travelled in Great Britain were made by cars, vans and taxis. The vast majority of trips (94%) are made using private transport, with 68% of people choosing to commute by car. In South West England this is even higher with 76% of commuting trips made by car. A reduction in demand for car travel will reduce GHG emissions in the district and improve congestion and wellbeing. However, this would require behavioural changes and improving public transit options.

Societal changes include factors such as home working. In 2022 commuting is the second most common trip purpose in the UK after shopping. Home-working, local working and internet shopping all offer the potential to reduce the total number of journeys undertaken.

Gloucester City Council employees currently implement an agile working policy with 62% of employees frequently working from home. When not working from home, 50% of employees travel alone, in a fossil fuel motor vehicle, 14% of employees routinely walk/run to site; and 14% of employees use public transport to get to site (7% bus, 7% train). Employees choice of mode travel is motivated by convenience, time, and cost. Improving public transit option, affordability and reliability will have the greatest impact in behavioural change.

With Gloucester City Council leading by example, local businesses and office workers have the potential to adopt the transport decarbonisation hierarchy and to prioritise digital communication where possible. Factors such as increased home-working and local working for those with access to these actions could reduce car travel.

Case Study: Gloucester City Council's Green Travel Plan

The plan provides a route map for reducing surface transport emissions and improving air quality. Through 15 recommendations, including exploring segregated cycle infrastructure and embedding an agile working policy, the project will enable the council's climate action to be even more focused and directed by hard data.

The Green Travel Plan demonstrates both the council's commitment to meaningful action as well as this action being informed by science to address the climate emergency and create a healthier city. 22% of the UK's total emissions are from road transport and so, by 2030, the council will achieve a 17% reduction in miles that officers commute against pre-pandemic levels and vehicles to be zero emission at tailpipe.

The plan quantifies and assesses the per capita surface transport emissions from officers' travel, surveyed their travel habits and barriers to devise the recommendations. The plan encourages home and hybrid working, prohibits domestic air travel, mapped safe, low pollution walking routes, is exploring segregated cycling and will encourage reductions in driving in a fair and reasonable way.

The agile working policy has enabled average annual employee commuting emissions to stand at 185kg CO₂e, whereas the national best-case scenario (taking the lowest carbon mode of travel available) is 281kg CO₂e. This is popular with staff, who can enjoy greater flexibility and reduces council office costs, enabling greater funds for essential services.

To deliver the transport actions of the GCCS, stakeholders in Gloucestershire will need to work collaboratively to access investment and funding. The Sixth Carbon Budget published by the CCC found that a reduction in private car use can be achieved through investments in infrastructure for active travel as well as improvements to provision and reliability of public transport. This can also be complementary to policy changes such as the Low Traffic Neighbourhoods (LTNs), which have been found to be one of the most effective ways to reduce overall car use in European cities.

Brighton and Norwich have piloted school trip planning, providing travel plans and advice for pupils and their parents, combined with promoting walking, cycling and car sharing achieving a 10% reduction in car use in Norwich. However, changing behaviour requires improving cycling infrastructure and other facilities for users.

Gloucester District

Promote and incentivise active travel and increase share of cycling journeys to 15% by 2045.

Gloucester District

Reduce car journeys to 47.5% through mode shift and provision of infrastructure by 2045.

Gloucester District

Reduce car journeys to 47.5% through mode shift and provision of infrastructure by 2045.

Gloucester District

Incentivising the use of low-carbon or active travel to reduce car use for school trips by 2045.

Gloucester District

Achieve 17% reduction in miles by car commuting employees, and fully electrified/zero tailpipe emission motor vehicles by remaining vehicles by 2030.

**Case Study:
Islington Low Traffic Neighbourhood**

People friendly streets, or Low Traffic Neighbourhoods (LTNs) are designed to enable people to walk and cycle around their communities more safely. Beginning in the 1970s and growing in popularity in 2020, LTNs use planters, bollards, and other street furniture to direct drivers towards suitable arterial networks and avoid quiet, community streets being turned into shortcuts and rat runs. This can decrease congestion, improve air quality, and enable children to play outside safely. They also facilitate those who would like to use active travel to walk and cycle.

Islington Council installed measures such as bollards and smart cameras to create space for residents to walk, wheel and cycle around their neighbourhoods. These are being trialled for 18 months, with residents' views and feedback being assessed after 12 months before a decision is taken on whether to make the trial period permanent.

Consultations generally showed the popularity of the schemes, with more residents taking up active travel, people feeling safer outside and significant improvements in local air quality.

|| Zero-Emissions Vehicles

The CCC estimates that cars and vans, battery-electric vehicles are now widely available and are likely to become cost-saving by the late-2020s. For HGVs options include battery-electric vehicles, hydrogen fuel-cells and electric road systems. Electric vehicle (EV) technology is developing quickly and the CCC expects uptake of Battery electric vehicles (BEVs) to grow to between 90-100% of new sales by 2030, although this may be subject to change given the Government’s recent change of deadline for phasing out the production of new, wholly combustion engine vehicles from 2030 to 2035.

Achieving Gloucester District and GCC net zero targets requires for delivering transport with zero tailpipe emissions including private vehicles, public transport, and freight operations. Gloucestershire County Council is committed to the roll out and encouragement of electric vehicles in Gloucestershire, with the rollout of 1,000 electric vehicle (EV) charging points in Gloucestershire, including sites in Gloucester. This will provide on-street EV charging for those without access to increase EV uptake.

Gloucester City Council

Work with procurement teams to decarbonise the fleet of diesel vans and heavy vehicles and achieve full electrification by 2030.

Gloucester District

Invest in charging infrastructure to achieve 100% decarbonisation of passenger services (taxis, buses) by 2035.

Gloucester District

Work with local businesses and procurement teams to decarbonise all HGV freight fleets by 2045.

4.5. Area of Opportunity for Action: Waste

|| Aim

Promote the reduction of waste generated and increase recycling rates in Gloucester District.

|| Waste in Gloucester

Sustainable waste management is a crucial part of meeting local net zero goals, and in supporting the development of a safer, greener society. Effective waste management practices not only reduce the amount of waste sent to landfills but also minimize the environmental impact of waste disposal. By implementing recycling programmes, promoting composting, and encouraging waste reduction strategies, local authorities can significantly reduce greenhouse gas emissions, create jobs, and conserve valuable resources.

By 2027/28 forecasts suggest that Municipal Solid Waste in Gloucestershire will increase to 359,612 tonnes (Gloucestershire Core Waste Strategy 2011). With a growing population the volume of household and business waste, alongside waste from building sites, farms, used cars, electrical equipment, and hospitals, is a critical issue for Gloucester City, and the county as a whole.

In 2022 Gloucester City Council worked to ensure a smooth transition to a new waste management partnership. The Council Plan (2022-2024) sets out three key actions regarding waste:

Deliver a community consultation to get feedback on our plans to increase recycling and reduce waste.

Transition successfully to the new waste partnership by 1st April 2022.

Maintain a minimum recycling level of 45% and develop a waste strategy to enable an increase.

Working in Partnership

Partnership working is a key part of delivering the City's objectives. Gloucester City Council is part of the Gloucestershire Resources and Waste Partnership (GRWP) which provides countywide leadership and a framework for joint working on resources and waste related matters. GRWP members work together to optimise waste management services across the county.

GCC works with the county, and delivery partners to provide a range of waste management services including bins and recycling, street cleaning, fly-tipping, and handling environmental crime and offences. GCC also manages over 100 volunteer litter pickers and has worked with neighbouring local authorities to support the development of the Waste Wizard online platform which helps people manage their waste. The council is also working with Podback to provide a new free recycling service to help people recycle pods (coffee, tea, and hot chocolate) at home

At a county level, climate goals, and to cope with the growing pressure put on waste management systems, Gloucestershire County Council developed **Gloucestershire's Waste Core Strategy (2012-2027)**. The strategy sets out how the County Council and its partners are addressing the issue of waste management.

As part of this strategy the county set a target of achieving a recycling rate of 60% by 2020 however, a 2020-21 analysis found that Gloucestershire's recycling rate stood at 50.8%, with a significant amount of recyclable material still being disposed of by residents as residual waste. Further study showed that if all residents recycled as much as they could within the existing waste services the recycling rate would be more than 70%.

To address this, the Gloucestershire Resources and Waste Partnership (GRWP) is implementing a new Gloucestershire Resources and Waste Strategy. The GRWP has committed to developing annual action plans and has set out three key performance measures:

What's in your waste?

In 2019 we did a survey to find out what's in Gloucestershire's waste. Here's what is in your waste bin:

- Food waste 25%
- Paper 11%
- Garden waste 8%
- Plastic containers 8%
- Textiles 5%
- Card 4%
- Non-recyclable 39%



Recycling rate.

The recycling rate (which also includes reuse, composting and anaerobic digestion) has steadily climbed over a number of years although has not yet reached the original strategy target of 60%. We will maintain a target of 60% recycling but recognise that achievement of this will require further step changes in service delivery. In the meantime, the annual action plan will aim to deliver incremental improvement towards this target, with an interim target of 55% by 2026.

Residual waste per household.

This has been reduced significantly in recent years and, excluding 2020/21 when the effects of lockdown and home working skewed the tonnage data, continues on a downwards trend of between 10 and 20kg per household per year. Residual waste targets will therefore be set, reducing 10kg per household per year in line with this trend.

Carbon emissions.

Each partner authority monitors the carbon emissions associated with its activities and we will continue to do this. We will also develop a robust mechanism whereby carbon emissions are targeted for reduction and are embedded as a core aspect in decision making, for example in contract procurements or in operational delivery.

Examples of actions that the GRWP is exploring include:

- ▶ The addition of further separate materials collections for recycling, such as soft plastics (e.g., plastic films and bags), where viable.
- ▶ The continued encouragement of higher levels of participation in waste reduction, reuse and recycling by residents using behaviour change engagement techniques, with a particular focus on food waste.
- ▶ Maintaining a focus on materials quality, adapting services to respond to changing market requirements and the development of a more circular economy.

To achieve net zero emissions by 2045, Gloucester District will continue to work closely with Gloucestershire and existing policy, including the suggested approach by the CCC in the Sixth Carbon Budget Waste report for a balanced net zero pathway, as described in the actions below.

Gloucester District

33% reduction in all waste generated by 2037.

Gloucester District

Increase recycling rate to 68% by 2030 and to 70% by 2045.

Case Study: Making Recycling Work for People In Flats, London



ReLondon is a partnership of the Mayor of London and the London boroughs that aims to improve waste and resource management across the city.

In 2019 ReLondon led work to understand barriers to recycling in flats and enhance recycling rates and effectiveness. To do this the organisation conducted surveys of 132 inner London Peabody housing estates and conducted in-depth ethnographic research involving residents.

Using the insights gathered, ReLondon collaborated with housing providers, local authorities, and waste management organizations to create the 'Flats Recycling Package.' This package comprised a series of improvements to recycling facilities in purpose-built flats. The 'Package' aimed to provide residents with clear information and included a set of changes to recycling arrangements in purpose-built flats that could be implemented and tested to see how effective they were at improving recycling and capture rates.

The 'Package' was rolled out across 12 London housing estates over a span of nine months, concurrently implementing behavioural interventions designed to encourage residents to increase their recycling efforts. It also introduced five behavioural interventions across 10 of the 12 estates, including new signage around rubbish bins, feedback posters and in-home storage solutions for recycling.

The 'Flats Recycling Package' of measures substantially increased the volume and quality of recycling across all 12 estates. The overall capture rate increased by 22%, the recycling rate increased by 26% and the contamination rate decreased by 24% over the nine-month period.

4.6. Area of Opportunity for Action: Biodiversity

|| Aim

To safeguard and create green spaces that enhance biodiversity, facilitate active travel, link neighbourhoods, and protect communities from the impacts of the climate crisis.

|| Biodiversity in Gloucester

Biodiversity plays a crucial role in maintaining the health and balance of our ecosystems. Green and blue infrastructure, such as parks, forests, wetlands, and green roofs, not only support local biodiversity but also help to sequester emissions, adapt to climate change, and improve people's physical and mental wellbeing.

The City of Gloucester is home to over 200 areas of public open space including parks, allotments, cemeteries, six nature reserves and two Sites of Special Scientific Interest. With over 14% of the city's total land area made up of publicly accessible green space, the GCC recognises that biodiversity is an important part developing a healthier, more sustainable city.

Between 2014 and 2019 the council added an additional 15 hectares of new open space and over £2million for improvements to existing parks and open spaces across the city. However, the City's growing population (and ongoing projected growth) is putting pressure on local green spaces as demand for housing development increases. In response the council has developed policies to protect most public and private open spaces, as well as guidance to include green spaces in any new developments.

|| Biodiversity objectives

Gloucester City Council's Open Space Strategy (2020-2025) sets out key biodiversity objectives including:

To develop site improvement plans or site management plans for larger/priority open spaces and those sites with the greatest potential for increasing biodiversity.

Review the council's grounds maintenance contract and identify opportunities for less intensive open space management, to increase biodiversity, sustainability and ensure best use of available resources.

To utilise green space to help mitigate the effects of climate change and biodiversity loss, through habitat creation and management, increased tree planting, water management schemes and other appropriate measures.

To maintain Green Flag status for existing sites and to seek opportunities to increase the number of Green Flag parks in Gloucester.

In addition to the Open Space Strategy the council has developed Gloucester’s City Plan (2016-2031) which sets out guidance on a variety of aspects pertaining to green spaces across the City. The Plan sets out strategic objectives around conserving and enhancing the environment, trees and hedge row protection, protecting open spaces, delivering excellent design in new developments, meeting the challenge of climate change, and promoting healthy communities. Key themes within the Plan include:

|| Enhancing biodiversity

- ▶ Development proposals must demonstrate the conservation of biodiversity, in addition to providing net gains appropriate to the ecological network. All new streets must also be tree-lined unless it can be justified otherwise.
- ▶ Damage to the natural environment must be avoided or mitigated, and biodiversity offsets could be considered to provide overall net gain. The Severn Vale Nature Recovery Area (NRA) has been identified as an area for biodiversity offsetting as part of achieving biodiversity net gain when development proposals cannot deliver enhancements on site.
- ▶ Development which would result in the loss of irreplaceable habitats such as Ancient Woodland, Ancient Trees and veteran trees are not permitted except in exceptional circumstances.



Watercourse renaturalisation at Sudbrook, which has improved biodiversity and increased natural water retention.

|| Complying with the National Planning Policy Framework (NPPF)

- ▶ In accordance with the NPPF, the Local Nature Partnership (LNP) are currently mapping Gloucestershire’s ecological network. This includes identifying existing habitat, restoration opportunities, existing connectivity, and the strategic locations for increasing connectivity.
- ▶ Biodiversity Net Gain (BNG) is another key part of the NPPF, and the City Council is working with developers to incorporate BNG requirements into ongoing and future activities.

|| Allotments

- ▶ Allotments are key spaces for biodiversity as well as providing a range of other ecological and wellbeing benefits. Existing allotments are protected from redevelopment unless an appropriate alternative provision is made by the developer. The provision of new allotments will be supported where they would meet identified need within a community.

|| Green infrastructure targets

The importance of green infrastructure in helping to reduce the localised effects of global warming cannot be overstated. Urban tree canopy cover, in particular, helps – via shading, removal of hardstanding, and evapotranspiration – to significantly reduce the propensity, intensity, and duration of extreme heat events, with cascading effects on peak energy demand for cooling and hospital admissions; rainwater gardens and tree pits reduce surface water flooding; and green roofs reduce pressure on the drainage system while enhancing biodiversity.

As part of the City’s work to achieve its net zero ambitions Gloucester City council has committed to a programme of tree planting. The council has already collaborated with the Royal Forestry Commission, the Woodland Trust, and Gloucestershire County Council to plant 12,800 new saplings across all 18 of the city’s wards, and an additional further 100 large ‘standard’ specimens will be planted across Gloucester.

At a county level, Gloucestershire County Council has committed to planting one million trees by 2030, a target that aligns with the recommendations of the Gloucestershire Tree Strategy (current total up to 220,396 (2023)).

Case Study: Linking Neighbourhoods Through Green Infrastructure, Little France Park, Edinburgh.

Little France Park is a peri-urban green corridor that links Edinburgh City Centre to Midlothian. It is approximately 45ha has been created by reclaiming unmanaged grassland. The park is made up of a range of habitats including grassland, hedges, wetland (that has been created as part of a flood alleviation scheme), woodland and moving water courses. It is ecologically diverse and species rich and the site became a nature reserve in 2021.

The park includes a 3km cycle route that links new housing developments with the city and public transport routes. The park is adjacent to some areas of economic deprivation and is an important resource for local people.

4.7. Area of Opportunity: Gloucestershire Airport Estate

Gloucestershire Airport, located at Staverton, is jointly owned by is Gloucester City Council and Cheltenham Borough Council. The analysis below summarises Gloucestershire Airport’s carbon baseline emissions for 2019 and actions to reduce emissions (excluding the air fleet).

The airport’s emissions have been calculated based on electricity and fuel consumption (made up of jet fuel, aviation gas (AVGAS), unleaded avgas 91 (UL91), and red diesel). Figure 4-15. Percentage contribution to airport emissions by source (CO2e). Source: CLS Energy Ltd adapted by WSP. shows the relative contribution of each emission source converted into tonnes CO2e. The aviation fuels combined (jet fuel, AVGAS, and UL91) is by far the most significant source, making up almost 99 percent of emissions.

Analysis of the airport’s electricity demand only (presented in kilowatt hours (kWh)) shows that consumption is generated from 12 locations. The top four sites (New Hanger and Terminal, Control Tower, SE27, and Gloucester Airport Limited (GAL)) contributing 90% of the the airport’s electricity consumption (with the top 3 contributing 80%) as shown in Table 4 2

Figure 4-15. Percentage contribution to airport emissions by source (CO2e). Source: CLS Energy Ltd adapted by WSP.

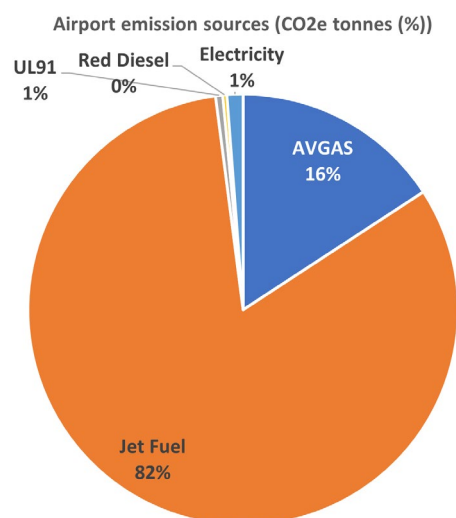


Table 4-2. Electricity Consumption Across Gloucester Airport Buildings. Source: CLS Energy Ltd Adapted by WSP

Building	Cost (£/kWh)	Consumption (kWh)	Total (%)
New hanger and terminal	0.13	128,451	32.73
Control tower	0.12	124,876	31.82
SE27	0.13	62,455	15.91
GAL	0.13	35,900	9.15
Pump house east camp	0.13	11,955	3.05
New service sewage pump	0.13	9,170	2.34
SE21 Goodrem Nicholson	0.13	6,034	1.54
SE44 Hangar	0.14	5,092	1.30
Unit 18	0.10	3,914	1.00
Blenheim House	0.13	3,411	0.87
SE20	0.13	946	0.24
Sewage farm	0.13	236	0.06
Total		392,440	100.00

|| Actions for Gloucestershire Airport Estate

Actions to reduce emissions have been identified for the airport estate, split between energy efficiency measures and renewable measures, with detail provided in Appendix B – Actions For Gloucestershire Airport Estate.

The impact of the actions has been considered in terms of ability to reduce emissions and the payback period. The payback period represents how long it will take for the initial investment to have repaid itself through profit or financial savings.

Figure 4-16. Energy savings and payback period - energy efficiency actions for Gloucestershire Airport Estate. Source: CLS Energy Ltd adapted by WSP.

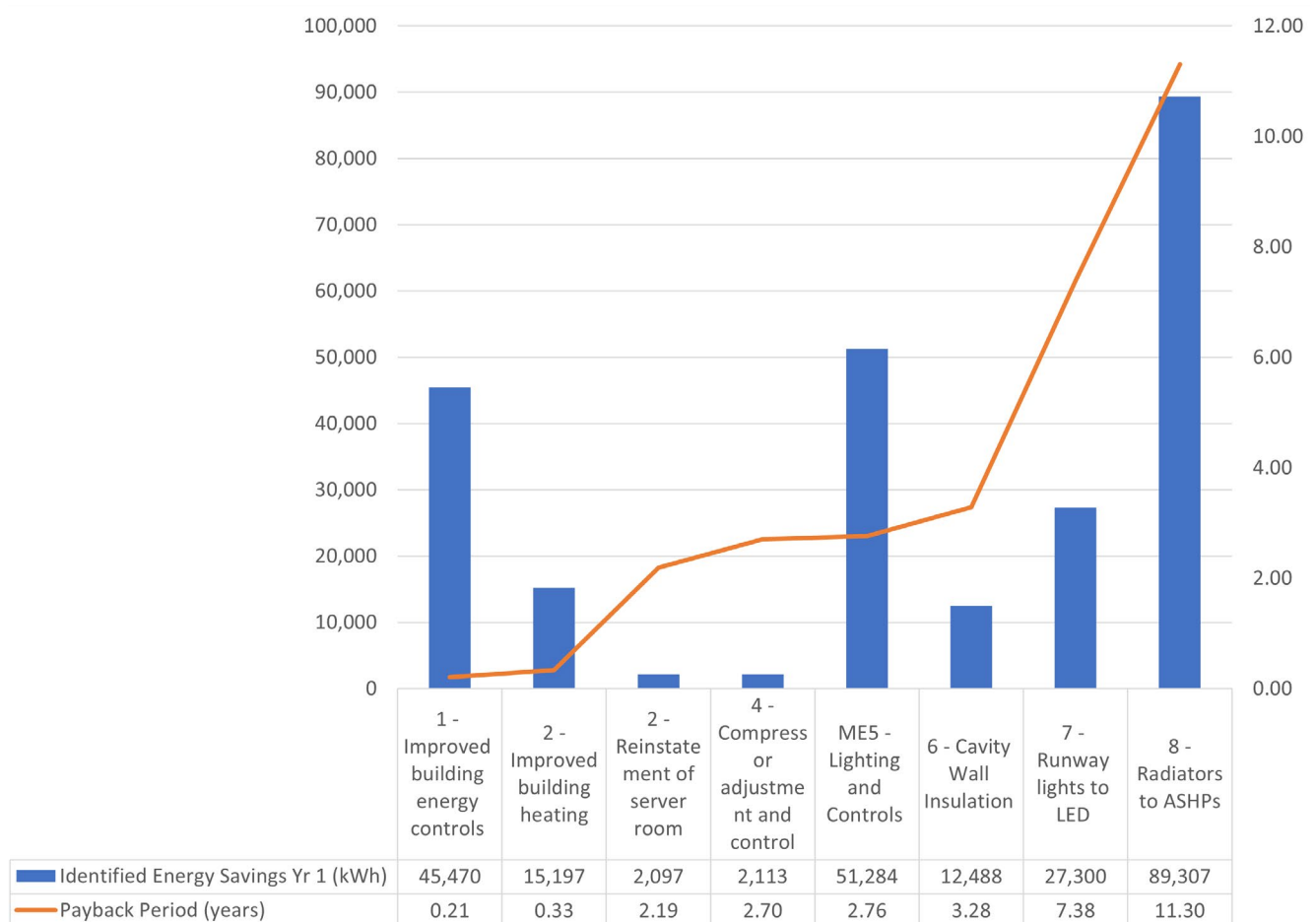


Figure 4-16 shows the combined energy savings and payback period for energy efficiency actions. The energy efficiency actions with the greatest impact within the shortest payback period are 1 - Improved building energy controls, 2 - Improved building heating, and 5 - Lighting and controls.

5. Adaptation – Understanding Vulnerability to Climate Change

5.1. Introduction

Recent experiences have demonstrated the impact that a changing climate has on our communities, buildings, infrastructure, businesses, and natural environment. In order to protect ourselves from such impacts, we must first understand how the climate is changing, what the consequences of that will be in terms of the weather, and the threats, or opportunities, this poses to our everyday lives and the council's operations and services.

The Global Covenant of Mayors, the world's largest global alliance for city climate leadership, includes a commitment to supporting and enhancing adaptation efforts to increase resilience to adverse climate change impacts. To be able to do so requires the preparation of a Climate Risk and Vulnerability Assessment, to understand the existing and future climate, and the risks or opportunities this may bring, to be able to inform the necessary adaptation efforts.

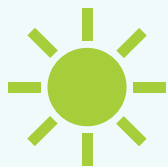
Figure 5-1. Floodwater being pumped from a property in Gloucester.



5.2. Current and Future Climate

WSP has used the latest UK Climate projections (UKCP18) and related tools to identify projected changes in climate for Gloucester. Projections were identified for the 2030s, 2050s and 2080s. Figure 5-2 indicates that by the 2080s, Gloucester will experience:

Figure 5-2. Future Climate Scenarios for Gloucester. Source: WSP



The **average summer day** could be up to **5°C warmer**



A shift in the **growing season**



Increased **winter rainfall** by **over 20%**



An increased likelihood of **surface water and river flooding**, influenced by tides and extreme rainfall



An **increase** in the number and severity of **wildfires**



Heatwaves occurring **six times** more often



Three times less **frost days** and a **reduction in snowfall**



Reduced summer rainfall by **over 35%**



An increase in the **frequency and intensity of storms**

5.3. Vulnerable Groups

Climate change and extreme weather events threaten our health by affecting not only the weather we experience but also the food we eat, the water we drink and the air we breathe. While climate change can affect anyone, particular members of society are more vulnerable than others. For Gloucester, these include:



Women and girls

Vulnerable to climate change based on biophysical characteristics and gender inequalities. 50.5% of Gloucester's population are women and girls



Elderly

More likely to be increasingly physically, financially, and emotionally at risk to the impact of climate change, largely due to changes in mobility, physiology, and restricted access to resources. 16.7% of Gloucester's population are over 65.



Children and youth

Face disproportionate health effects particularly from heat related impacts as they are dependent on adults to help them adapt in their behaviour and clothing. This can have a detrimental impact on mental health and wellbeing. 19.2% of Gloucester's population are 15 and under.



Marginalised/minority communities

Can be disproportionately affected by climate change. This is generally linked to the vulnerabilities associated with people on lower incomes due to historic and systemic inequalities faced by these communities. Alongside reduced engagement and access to information. 7.7% of Gloucester's populations main language is not English.



Persons with disabilities

Can experience significant levels of vulnerability to changes in climate as a result of limitations presented across local infrastructure and services. 7.4% of Gloucester's population identify themselves as disabled and limited a lot.



Persons with chronic health conditions

Existing medical conditions can make individuals more sensitive to climatic changes, increasing the potential for health impacts and worsening symptoms. 22.4% of Gloucester's population suffer from respiratory conditions, 20.5% with poor mental health, 9.2% with heart disease, and 1.5% with dementia.



Low-income households and unemployed individuals

Those on low income are less able to deal with climate events as they lack the economic or financial capacity to invest in measures to make their homes more resilient e.g., flood insurance. Just over 20% of Gloucester's population are within the most 20% deprived nationally for income deprivation.



Persons living in sub-standard housing

Tenants in the social and private rented sector are likely to have a lower ability to adapt to climate change and extreme weather events compared to homeowners. Reliant on their landlord to ensure that they live in a building which is appropriately insured and retrofitted with appropriate equipment (e.g., air conditioning/heating). In Gloucester, 35% of households are renters.



Outdoor workers

Vulnerable to extreme heat and weather events, impacting their occupational health and safety as well as influencing their line of work. In the Southwest, 134,400 are employed in construction, 75,500 in agriculture, forestry and fishing, and 40,300 in mining, quarrying and utilities.



Frontline workers

Health, education, and emergency service workers become increasingly vulnerable as climate change exacerbates conditions as they have increased exposure to people suffering from climate induced health problems (e.g., vector-borne diseases), as well as an increase in strain on services due to higher demand, subsequently impacting the physical and mental health of frontline workers. In the Southwest, 611,800 workers are employed within health and education.

5.4. Key Risks

As part of the CRVA process, risks were identified across the six themes of Community Wellbeing; Infrastructure (including IT, transport and energy); Biodiversity and Environment; Housing and Buildings; Waste and Water; and Culture, Leisure and Tourism. The risks were identified through an in-depth analysis of documentation provided by GCC, a review of the UK's Third Climate Change Risk Assessment (CCRA3) and stakeholder engagement sessions.

The UK's Third Climate Change Risk Assessment (CCRA3) was used as a foundation to develop the risks applicable to Gloucester. CCRA3 identifies primary risks to health and social care, energy, telecoms and ICT, transport, agriculture and food, housing, business, water, and cultural heritage. This includes, for example, risks to agricultural and forestry productivity, to business locations and infrastructure, to building fabric, to infrastructure networks from cascading failures, to health and wellbeing from high temperatures, to household water supply, to people, communities and buildings from flooding, and risks to infrastructure from subsidence. Therefore, through using these themes and risks as a basis to which the CCRVA could evolve into risks and themes that were distinctive to Gloucester.

Figure 5-3. The Percentage of Overall CRVA Risks per Theme Across All Time Periods (current, 2030s, 2050s and 2080s). Source: WSP

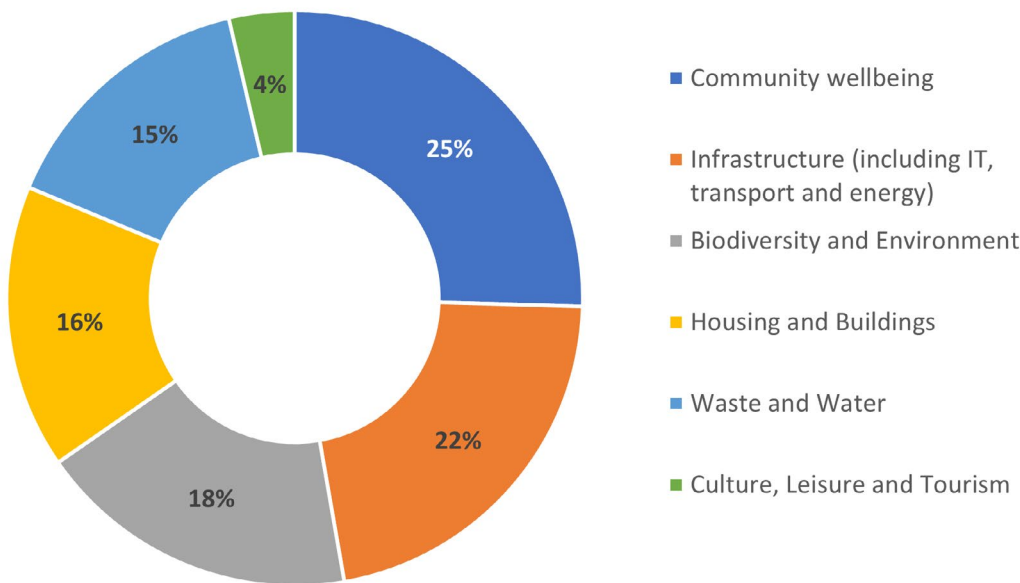


Figure 5-3 shows the percentage breakdown of all risks (low, medium, high and very high) across the themes. 25% of risks fall within the category of Community Wellbeing.

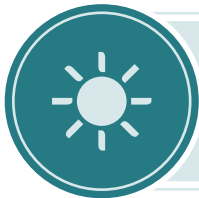
Presented below is a summary of the key findings of priority risks identified during the CRVA process.

Table 5-1. Priority Risk Examples Identified During the CRVA Process. Source: WSP

Theme	Priority Risks
Community Wellbeing	<ul style="list-style-type: none"> ■ Unsafe working conditions and reduced employee productivity. ■ Pressure on emergency, education, and health services. ■ Risks to physical and mental health. ■ Risk to the homeless. ■ Inability to travel, leading to isolation, missed medical appointments etc. ■ Increase in antisocial behaviour and crime. ■ Issues with deliveries of supplies such as food or medicine. ■ Forced migration and civil conflict.
Infrastructure (IT, transport, energy)	<ul style="list-style-type: none"> ■ Damage to infrastructure, such as IT equipment. ■ Road / rail accidents. ■ Disruption of transport, including congestion and delays. ■ Loss of power.
Biodiversity and Environment	<ul style="list-style-type: none"> ■ Damage to and/or loss of crops. ■ Increase pressure on water supply. ■ Damage to young trees, impacting establishment. ■ Increased tide levels, due to wind and sea level rise, leading to increased risk of flooding. ■ Increased tree and branch fall. ■ Increase in pests, pathogens, and invasive species. ■ Decline in species populations and habitats.
Housing and Buildings	<ul style="list-style-type: none"> ■ Damage to / flooding of vulnerable assets, such as schools, care homes, children’s homes, health centre’s etc. ■ Flooding of homes and businesses. ■ Increase in risk of subsidence or landslides. ■ Destruction of homes and businesses due to wildfire or storms. ■ Displacement of residents. ■ Risk of mould.
Waste and Water	<ul style="list-style-type: none"> ■ Introductions of water restrictions ■ Contamination of water supplies ■ Reduced efficiency of burning waste ■ Water supply interruptions ■ Asset flooding ■ Strain on street cleaning services
Culture Leisure and Tourism	<ul style="list-style-type: none"> ■ Increase in public safety concerns regarding health. ■ Loss of business. ■ Overheating of outdoor sports facilities. ■ Increased risk of fire.

5.5. Opportunities

Whilst climate change does pose considerable risks, it also presents opportunities to be benefitted from.



An increase in sunshine leading to an increase in energy generation from solar power can create opportunities for offsetting carbon emissions and creates long-term cost savings.



Warmer winters resulting in reduced household heating can save energy and costs to homeowners.



New business opportunities will arise in areas such as retrofitting, the food and beverage sectors, and outdoor leisure pursuits.



There will be benefits to health and wellbeing, with an increase in outdoor leisure pursuits, and a reduction in cold-related illnesses and lessened symptoms of some conditions.



The local economy will benefit from increased tourism, as a result of an extended tourist season due to warmer, drier weather.



There will be opportunities for new plant, animal or bird species to colonise habitats, and new planting opportunities.



Agriculture and forestry could be boosted by the increased suitability of new and alternative crop and tree species.

5.6. Adaptation Activities

As seen in recent years, climate change and extreme weather events have caused damage to the environment and community. To strengthen the city's resilience to climate change, there is the need to alleviate the impacts that climate change presents, such as those identified in Table 5-1, through adaptation. Climate change adaptation is (IPCC, 2022):

The process of adjustment to the actual or expected climate and its effects.

Adaptation is important for Gloucester because, despite the fact that the causes of climate change might be global in nature, the effects of climate change are felt locally. As the effects are felt locally, the solutions need to be specific to the local context. To identify these adaptation solutions for Gloucester, a collaborative effort was made by WSP and council officers through exploring existing adaptation measures in place at the local, county and national levels, investigating other council's adaptation measures, and online research. These adaptation measures have been established in response to the CRVA, to mitigate the high and very high risks that were identified, and examples are discussed throughout this section, looking more closely at those actions under community wellbeing, biodiversity and environment, and built environment and services. These themes have been selected as there are multiple overlaps between the adaptation actions from the original six themes.

In establishing the adaptation actions for Gloucester, a number of co-benefits were identified. Co-benefits are valuable because they target multiple objectives and reduce numerous risks through one adaptation action, which also has the benefit of being cost-efficient. Two types of co-benefits were identified, these were direct and cascading. Direct co-benefits simultaneously meet several objectives that enhance climate resilience and the overall environment, society and economy. Cascading co-benefits meet several objectives in succession of one another.

Direct example: Joint Green Infrastructure Strategy

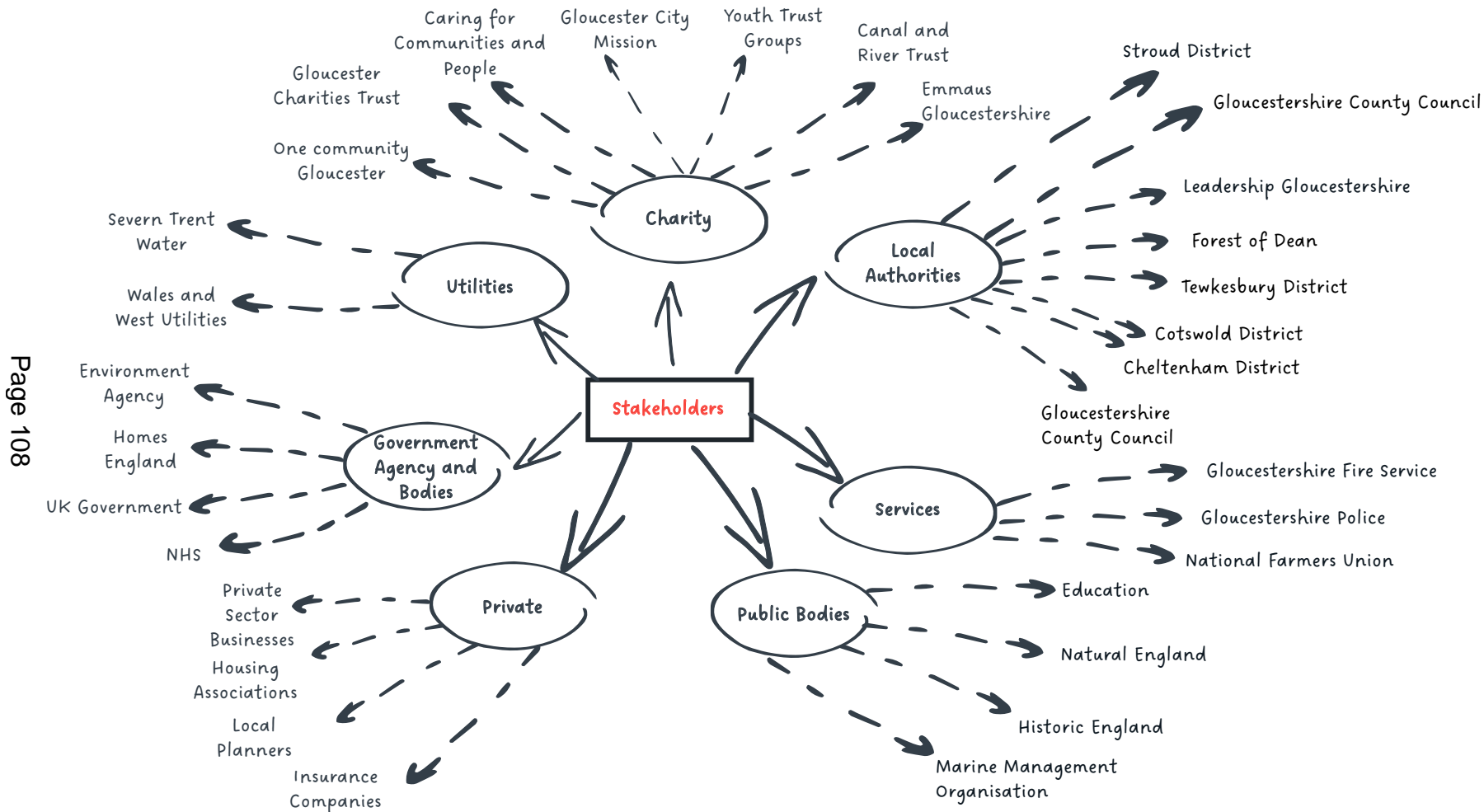
- Reduces flood risk
- Improves biodiversity
- Creates carbon sinks
- Decreases local temperatures
- Provides new habitats
- Improves community

Cascading example: Flood defences

- Reduces disruption
- Reduces insurance claims
- Cost savings
- Reduces damage to assets / residential and commercial buildings
- Reduces impacts to physical and mental health

However, it's important to acknowledge that adaptation is not any specific individuals responsibility. It is a cross-cutting and cross-sectoral issue that is relevant and of interest to a wide range of stakeholders, as identified in Figure 5-4. Their engagement and participation can also greatly support adaptation action. Therefore, it is necessary to understand who these key stakeholders are for Gloucester as working in partnership allows for a greater pool of knowledge, shared resources and responsibility, has a greater influence and addresses interdependencies between organisations.

Figure 5-4. Gloucester City Council's stakeholders. Source: WSP



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The adaptation measures mentioned above are both an example of where multiple organisations can come together, in this instance neighbouring local authorities or GCC and the Environment Agency, and develop adaptation actions that work towards an increasingly climate resilient City in a more effective way.

**Case Study:
Gloucestershire Local Resilience Forum**



Gloucestershire Local Resilience Forum (LRF) is a multi-agency partnership made up of representatives from the emergency services, local authorities, the NHS, the Environment Agency and others.

The Partnership co-ordinates effective and efficient integrated emergency management arrangements within Gloucestershire to prepare your family, business and community for emergencies and disruption.

The LRF carries out a risk assessment to identify the range of risks present in the community, assess the likelihood of their occurrence together with the health, social, economic and environmental impacts that would occur in the event of the risk happening.

The completed risk assessment is used to help prioritise the work they do to ensure emergency preparedness. They subsequently provide advice to help you prepare for cold weather, fires, flooding, storms, extreme heat, power failures, evacuation and more in their 'Are you Ready' booklet. Being prepared can help reduce the effects of extreme weather on your life, reduce the need for support from others and enable you to support the vulnerable members of your community.

Action: Joint Local Plan Update

The Joint Strategic Plan is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, which sets out a strategic planning framework for the three areas.

Since the Joint Core Strategy was adopted in 2017, the councils' have been working towards a review of the plan.

A review of the plan provides the opportunity to develop sustainable construction, biodiversity, flood risk, and green infrastructure policies into a more targeted approach towards adaptation in new developments and communities.

Action: Adaptation Working Group

The newly formed Gloucester Adaptation Working Group is comprised of local stakeholders who will meet on a quarterly basis to discuss climate adaptation in the local area, through a formal governance process.

The Group provides the ideal opportunity to share experiences, knowledge, and funding to work towards co-ordinated goals and targets to improve climate resilience in Gloucester.

Using the CRVA from this report, the Group can establish priority risks to their individual and combined sectors and determine the actions necessary to reduce those risks.

|| Community Wellbeing

Community wellbeing as a theme brings together a range of areas, including, education and children, physical and mental healthcare, crime, food security, employment, and social care. Ensuring that communities are capable of anticipating, preparing and responding to events, trends, or disturbances related to climate is essential to successfully adapt to climate change. As such, public participation plays such an important role in the effort to adapt to climate change.

Community Based Adaptation (CBA) embodies local community action on climate adaptation initiatives. This may involve participatory learning and problem-solving (including creative trial-and-error approaches), sharing, collaborative planning and local implementation of climate adaptation initiatives.

What is important to the community in terms of climate adaptation?



|| What can individuals do?

There are many ways to adapt to what is happening and what will happen. Individuals can take some simple measures. It is beneficial to plant or preserve trees at home, opt for vegetative gardens as opposed to hard standing patios or plastic alternatives, this supports cooling of inside temperatures, support natural ecosystems, and provide natural drainage systems. Investing in flood gates or barriers at home if it is prone to flooding and encouraging neighbours to do the same. Using a variety of shading types and fixtures to windows reduces overheating from windows. The most effective type is by using external, fixed shading, for south facing windows deep reveal with horizontal overhangs are most effective and for east/west facing windows vertical moveable shutters/louvres are most effective. Rainwater collection systems such as green roofs, rain gardens or water butts can be used to both reduce localised flood risk and support green spaces during drought periods and in the event of hose pipe bans. Clearing brush might reduce fire hazards. For businesses, start thinking about and planning around possible climate risks, such as hot days that prevent workers from doing outside tasks.

What can Gloucester City Council and the community do?

The loss of urban green space leads to increases in urban heat and flooding, which are amplified by climate change, and can threaten human health, well-being, infrastructure and property. Open and green spaces provide natural cooling of air and surfaces, and support water management in urban areas. Green spaces are an invaluable resource for delivering sustainable urban health to the community and Gloucester City Council Open Space Strategy supports this. Other adaptation actions to support the community include raising awareness and training, working with stakeholders such as fire and rescue and the NHS to support vulnerable community and those directly impacted by extreme weather events and co-designing solutions with communities, as identified on the following page.

Case Study: Gloucester City Council Open Space Strategy



Gloucester's open spaces provide residents and visitors with opportunities for formal and informal recreation, and daily contact with nature. Open spaces provide venues for sports, social events, entertainment, relaxation and celebration. Open spaces are places where people from communities can come together to rest and play. Open spaces also form part of a vital biodiversity network, providing habitat for wildlife and bringing the countryside into the heart of the city. The council has embarked on an exciting programme of biodiversity and habitat improvement schemes aimed at making green spaces even more wildlife friendly. Green spaces also provide areas where natural processes can occur, which is vital in helping to protect Gloucester City and its residents from the effects of climate change.

The Open Space Strategy aims to utilise green space to help mitigate and reverse the effects of climate change and biodiversity loss, through habitat creation and management, increased tree planting, water management schemes and other appropriate measures, and support the health and wellbeing agenda and help address health inequalities, by improving existing open space facilities in areas of the city where there is a deficit in the provision of open space, and where the scope to provide additional open space is limited.

Action: Awareness Raising

The City Council should work with partners to provide training and workshops for young people focusing on awareness and coping with climate anxiety.

Action: Extreme Weather Follow-Up Scheme

The City Council should establish a follow-up system with the County Council Public Health officer and NHS for victims of flooding, storm damage or wildfires to ensure their wellbeing.

Action: Fire and Rescue Community Wildfire Education Programme

The City Council should work with Gloucestershire Fire and Rescue on public education of wildfire causes and risk.

Action: Community Support for Retrofitting

The City Council should establish a communications plan to encourage residents / businesses to invest in mechanical cooling measures and establish a plan for potential funding to retrofit cooling measures for the most vulnerable.

Action: Climate Cafés

A climate café would be a free event held by the Council to discuss climate risk and adaptation with the local community. It can be used to raise the general public's awareness of health-related impacts from climate change and avoidance measures.

Action: Wildlife Trust Projects

The City Council should continue working with the Wildlife Trust on a range of projects with different groups to improve wellbeing, including projects such as Nature Nurtures, Tuffley Rose Garden, Brighter Future, and Nature on your Doorstep.

Action: Overheating Respite Area Creation

The City Council should consider developing outside respite areas (shaded, open to air currents, potentially with moving water) for (particularly vulnerable) people who live in premises at risk of overheating and within large open spaces.

|| Biodiversity And Environment

The risks associated with biodiversity and environment, such as damage to and/or loss of crops and vegetation, increase in pests, declines in species populations and habitats and so forth are areas which are vital to the functioning of our ecosystem. The environment is also critical to absorbing carbon, reducing local temperatures, managing flood risk, restricting wildfires, enhancing wellbeing, reducing air pollution, and improving biodiversity.

Protecting biodiversity is key to adapting to climate change, as healthy ecosystems are much more resilient and therefore able to maintain the services on which we depend. The loss of biodiversity can lead to an increased risk of wildfire, urban heat extremes, and flooding, as well as having a cascading effect on interdependent species. However, an increase in biodiversity and green space will provide protection against such risks, as with the renaturalisation of watercourses in Gloucester which provides flood risk protection from the river. Actions taken to mitigate the risks to the environment often have many co-benefits, these measures include increasing connectivity of green and blue infrastructure through the Joint Green Infrastructure Strategy, new land management practices, regular vegetation inspections and maintenance, rewilding of landscapes, the creation of tiny projects, and enhancing the natural environment through creating or protecting wildflower meadows, or restricting grass cutting, as identified on the following page.

Case Study: Riparian restoration plus associated habitats

This project is located in an urban area on the Whaddon Brook, adjacent to Holmleigh Park, Gloucester. Prior to the project, the watercourse comprised a straight, concrete lined channel with short utility mown grass banks, offering very little in the way of habitat, biodiversity, and flood resilience.

The concrete base and sides were removed from a 180-metre reach of watercourse with a new, natural channel was created with meanders and a two-stage profile. In areas where there was a risk of bed erosion, stone cobbles were laid. Similarly, where there was a risk of lateral bank erosion, coir rolls, planted with native wetland species, were installed. Gravels were introduced to support fish and invertebrates, and the banks were sown with wildflower seed and native trees were planted.

The changes have allowed for reduced flood risk, an improved habitat for fish, invertebrates, insects, reptiles and small mammals, reconnected waterways, reduced pollution impacts, urban cooling, cost savings, and benefits to mental and physical health through creating a more aesthetically pleasing, nature-orientated space for people to enjoy.

Action: Joint Green Infrastructure Strategy

The Strategy sets out a local interconnected network of green infrastructure for the existing settlements, based around the network of watercourses linking together key strategic GI assets. This should be reviewed, monitored, and updated.

Action: Land Management and Farmer Collaborations

The City Council should work with farmers to support a shift in farmland management and encourage consideration of crop diversification, maintenance plans, and encourage relationships with water suppliers.

Action: Regular vegetation inspections and maintenance

The City Council should carry out regular inspections of vegetation and establish maintenance plans for vegetation, i.e. Watering schedules for newly-planted trees, regular inspection of trees for damage prior to storm events and other extreme weather events.

Action: Rewilding

The City Council should continue to provide support to partners to restore nature and landscapes in rewilding of the region. The delivery partners activities include research and monitoring, as well as practical conservation and awareness-raising.

Action: Tiny Forests

The City Council should establish Tiny Forests, these are dense, fast-growing, native woodlands about the size of a tennis court. Each forest is made up of around 600 trees and provides a biodiversity rich habitat, with low management and maintenance requirements.

Action: Gloucester Urban Green Project

The project has delivered benefits through multiple methods such as, changes to grass cutting regimes and wildflower meadow creation. The asset register and mapping should be made available online for public use and benefits should be monitored.



|| Built Environment And Services

The built environment and services addresses risks related to housing and buildings, infrastructure, waste and water, and culture, leisure, and tourism. The protection of residents, particularly vulnerable groups such as those with disabilities, people living in sub-standard housing, and low-income households is at the core to supporting resilience in this area, collaboration between the council and its stakeholders is essential, as evidenced below.

Gloucestershire's Local Transport Plan sets out several objectives which support the protection and enhancement of the natural and built environment, encourage sustainable economic growth, enable safe and affordable community connectivity, and improve community health and wellbeing. The Plan aims to reduce air pollution through supporting active travel, reducing congestion, and increasing planting. These measures will also help to improve the health and wellbeing of residents through reduced exposure to pollution and increased physical activity. Indirectly this objective reduces vulnerabilities to climate change. Increased planting is also targeted because of its multiple other benefits which directly decrease risks associated with climate change, including reducing flood risk, reducing local temperatures in heatwaves, protecting habitats, and carbon absorption. Gloucester Nature Park is similar in that there is increased planting and active travel provision, thereby providing the same benefits and climate risk mitigation. Additional actions are identified on the following page.

Case Study: Gloucester Nature Park



Gloucester Nature Park is an exciting new project focused on the area of urban fringe between Gloucester and the River Severn. It will include areas of new woodland, wetland, low carbon energy generation, wildflower meadows and green infrastructure. Accessibility is at the heart of this project:

- **Proximity to the city centre**
- **Increased footpath and cycle path provision**
- **Improved viewpoints and educational opportunities**
- **Opportunities to connect people with nature for the first time.**

So far, 480 people have been directly engaged with the project, through walks and talks, tree planting, and installing access improvements.

Climate resilience is at the heart of this project, including flood mitigation, renewable energy, and reducing the urban heat island effect.

Action: Future Design Standards

The City Council should collaborate on future design standards, such as with DHULC or Homes England, to mitigate climate risks and improve the adaptive capacity of new developments and communities.

Action: Review Locations of Key Infrastructure

The City Council and its stakeholders should review locations of key electrical connections / telecommunications' interfaces / signals / power supply equipment and where possible relocate away from areas likely to be affected by flooding.

Action: Multi-Agency Extreme Weather Plan

Emergency services are particularly impacted through demand on services to respond to flooding, storm, and heatwave events. Collaboration to alleviate pressure through a multi-agency extreme weather plan with neighbouring services should be considered.

Action: Water Efficiency Measures Installation

The Council should consider the installation of measures such as rainwater harvesting, grey water recycling and others to reduce water demand and use (e.g., low flow taps) in their properties, and encourage uptake of such practices to residents.

Action: Planned and Preventative Maintenance

Alongside stakeholders, the City Council should carry out regular inspections of assets (buildings, vegetation, infrastructure) and ensure planned and preventative maintenance takes place prior to, during and post-extreme weather events to minimise the risk of damage.



6. Delivering Our Climate Change Strategy

This section outlines the framework needed for delivery of the net zero and adaptation goals and supporting Climate Change Strategy, including governance, monitoring and communications of progress towards the goals. It will be developed into the final version of the GCCS draft in September 2023.

Climate action planning ensures successful and responsible climate change mitigation and adaptation in alignment with the community's needs. Gloucester Climate Change Strategy will set out actions to implement climate mitigation, adaptation, and access to sustainable energy strategies to meet net zero targets, as well as specific priority actions, and a timeline. The GCCS provides a holistic, approach to achieve mitigation, adaptation, and other sustainable development goals.



6.1. Governance

The diagram below published in the Climate Change Committee's Sixth Carbon Budget highlights local authorities' leverage and influence through the services they provide. The report notes that while councils face a number of significant barriers to achieving net zero, their leadership role both within their own operations, and in partnership with others, means that local authorities remain at the heart of the climate conversation.

As described in Table 6-1, local authorities have the power to lead on sustainability within their own operations, enable change through policies and partnerships, and inspire communities to take action.

Table 6-1. Gloucester City Council Climate Change Strategy Roles and Influence. Source: WSP

Lead	Enable	Inspire
In the council's operations	Action through programmes, policies, and decisions	Businesses and residents to act
<ul style="list-style-type: none"> Energy use Travel Council estate and land Procurement 	<ul style="list-style-type: none"> Transport networks Planning policies Waste and the circular economy Green spaces and biodiversity 	<ul style="list-style-type: none"> Helping residents lead more sustainable lives Providing climate and sustainability education opportunities for all ages Signposting organisations and individuals to act Partnering with other anchor and leading organisations to act together

6.2. Monitoring and Reporting Progress

As part of the progress monitoring and reporting approach of this GCCS, GCC would need to define a data collection approach to measure progress against net zero targets using the actions defined in this GCCS. This approach will help the council understand local climate action and its impact, which is crucial to get to net zero by 2030 for its operations and by 2050 for the district.

|| Data Collection and Performance

For each mitigation action of the GCCS, a deadline for delivery as well as level of effort have been identified to report progress against. GCC has the option to choose yearly targets to measure progress. The council and other Gloucester District stakeholders will need to collect data and information from stakeholders responsible for the delivery of actions. Data quality and accessibility will be key enablers to track progress and increase climate action.

|| Reporting on Progress

By disclosing annual progress, the council can transparently disclose the data and methodologies used and lessons learned with partners and neighbouring local authorities.

GCoM has a reporting framework with a standardised set of reporting requirements that apply across all GCoM regional covenants, while allowing for regional flexibility. The council will align its annual reporting with reporting to Cabinet Members and GCoM.

6.3. Raising Awareness and Communications

|| Within Gloucester City Council

The GCCS presents a springboard from which to build capacity and climate literacy across the council. Raising awareness internally is vital for generating buy-in and catalysing action. This may include activities such as:

- ▶ Tailored climate literacy training for Councillors and council staff that includes the key findings and recommendations of the GCCS.
- ▶ The development of accessible digital and physical communication materials that highlight key findings and next steps for the council.
- ▶ Presentation of the GCCS at committee, department, and senior leadership meetings.

|| With Local Communities and Partners

The climate crisis and the actions taken by local authorities have become important (and sometimes controversial) local issues. For this reason, the council must pro-actively disseminate information, and be prepared to react to questions from external stakeholders. Preparing for this could include:

- ▶ Ensuring that councillors and council staff have the knowledge and materials necessary to communicate the GCCS with local external stakeholders.
- ▶ Working with partner organisations to disseminate key messages from the GCCS and act on recommendations.
- ▶ Using digital channels to distribute information to the public.

|| Across the District

The causes and impacts of the climate crisis are not limited to local authority boundaries. It is important that the findings from the GCCS are discussed at a county and/or regional level in order to plan effectively. Doing this may include:

- ▶ Presenting the GCCS at key partnership meetings such as those held as part of the Climate Leadership Gloucestershire partnership.

6.4. Partnerships for Delivering the GCCS

Partnerships are a vital part of developing and implementing climate action. Both mitigation and adaptation are issues that transcend local geographies and sectoral boundaries. Councils have a key role not only in making their own operations more sustainable but in bringing different stakeholders together to drive holistic and coordinated climate action.

Gloucester City Council works with neighbouring local authorities as well as with central government, industry and local communities to mitigate and adapt to climate change.

|| With Central Government

In 2022 Gloucester received funding from the UK Shared Prosperity Fund, to be administered locally by the council, and given to schemes that help improve residents' opportunities and quality of life. Fourteen projects were awarded funding including a refill shop and a nature park.

|| With Neighbouring Local Authorities

At a local level Gloucester is part of Climate Leadership Gloucestershire (CLG) which brings together councils and strategic partners from across the county. The council also works closely with other district authorities across Gloucestershire, South Gloucestershire and other partners on a range of issues including its Affordable Warmth Strategy which aims to improve energy efficiency and its Green Travel Plan.

The council is working with Severn Wye Energy Agency which manages the Warm and Well domestic retrofit programme on behalf of the eight Local Authorities in Gloucestershire and South Gloucestershire.

|| With Local Communities and Partners

The council has partnered with the Gloucestershire Wildlife Trust to carry out Natural Flood Risk Management in the Twyver Catchment. The project is also receiving support from Stroud District Council and the Environment Agency.

|| With National and Global Networks

At a global level Gloucester City Council are members of the Global Covenant of Mayors and the UK100 Network.



7. Glossary

|| Adaptation:

- ▶ In human systems, the process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities. In natural systems, the process of adjustment to actual climate and its effects; human intervention may facilitate adjustment to expected climate and its effects.

|| Adaptive capacity:

- ▶ The ability of systems, institutions, humans and other organisms to adjust to potential damage, to take advantage of opportunities, or to respond to consequences.

|| Anthropogenic emissions:

- ▶ Emissions of greenhouse gases (GHGs), precursors of GHGs, and aerosols, caused by human activities. These activities include the burning of fossil fuels, deforestation, land use and land use changes (LULUC), livestock production, fertilisation, waste management, and industrial processes.

|| Biodiversity:

- ▶ or biological diversity means the variability among living organisms from all sources including, among other things, terrestrial, marine, and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems.

|| Business as usual (BAU):

- ▶ BAU projections assume that operating practices and policies remain as they are at present.

|| Carbon dioxide (CO₂):

- ▶ A naturally occurring gas, CO₂ is also a by-product of burning fossil fuels (such as oil, gas and coal), of burning biomass, of land use changes (LUC) and of industrial processes (e.g., cement production). It is the principal anthropogenic greenhouse gas (GHG) that affects the Earth's radiative balance.

|| Carbon neutrality:

- ▶ Carbon neutrality means having a balance between emitting carbon and absorbing carbon from the atmosphere in carbon sinks. Removing carbon oxide from the atmosphere and then storing it is known as carbon sequestration. In order to achieve net zero emissions, all worldwide greenhouse gas (GHG) emissions will have to be counterbalanced by carbon sequestration (European Parliament, 2023).

|| Carbon offsets:

- ▶ A carbon offset is a reduction in emissions of carbon dioxide or other greenhouse gases made in order to compensate for (“offset”) an emission made elsewhere.

|| Carbon sequestration:

- ▶ The long-term removal of carbon dioxide (CO₂) or other forms of carbon from the atmosphere, with secure storage on climatically significant time scales (decadal to century). The period of storage needs to be known for climate modelling and carbon accounting purposes (European Parliament, 2023)

|| Carbon sink:

- ▶ is any system that absorbs more carbon than it emits. The main natural carbon sinks are soil, forests and oceans. According to estimates, natural sinks remove between 9.5 and 11 gigatonne of CO₂ per year. Annual global CO₂ emissions reached 37.8 gigatonne in 2021 (European Parliament, 2023).

|| Climate:

- ▶ in a narrow sense is usually defined as the average weather, or more rigorously, as the statistical description in terms of the mean and variability of relevant quantities over a period of time ranging from months to thousands or millions of years. The classical period for averaging these variables is 30 years, as defined by the World Meteorological Organization. The relevant quantities are most often surface variables such as temperature, precipitation and wind. Climate in a wider sense is the state, including a statistical description, of the climate system.

|| Climate change:

- ▶ refers to a change in the state of the climate that can be identified (e.g., by using statistical tests) by changes in the mean and/or the variability of its properties and that persists for an extended period, typically decades or longer. Climate change may be due to natural internal processes or external forcings such as modulations of the solar cycles, volcanic eruptions, and persistent anthropogenic changes in the composition of the atmosphere or in land use.

|| Climate change risk and vulnerability assessment:

- ▶ Risk assessments focus primarily on the projected changes in climatic conditions, inventory of potentially impacted assets, the likelihood of the impact happening and the resulting consequences. Vulnerability assessments emphasise exposure, sensitivity and adaptive capacity of systems, assets and populations. Integrated risk and vulnerability assessments address both the vulnerability to and the impacts of climatic hazards.

|| Co-benefits:

- ▶ The positive effects that a policy or measure aimed at one objective might have on other objectives, thereby increasing the total benefits for society or the environment. Co-benefits are often subject to uncertainty and depend on local circumstances and implementation practices, among other factors.

|| Decarbonisation:

- ▶ Decarbonisation denotes the declining average carbon intensity of primary energy over time.

|| Enabling mechanisms:

- ▶ Enabling mechanisms are management and other approaches that engender execution in accordance with policy and planning intent (Peltz, Eric, et al, 2012).

|| Greenhouse gases (GHG):

- ▶ Gaseous constituents of the atmosphere, both natural and anthropogenic, that absorb and emit radiation at specific wavelengths within the spectrum of radiation emitted by the Earth's ocean and land surface, by the atmosphere itself, and by clouds. This property causes the greenhouse effect. Water vapour (H₂O), carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄) and ozone (O₃) are the primary GHGs in the Earth's atmosphere.

|| Global Convenance of Mayors:

- ▶ The Global Convenance of Mayors (GCoM) is the largest global alliance for city climate leadership, built upon the commitment of over 11,500 cities and local governments. GCoM serves cities and local governments by mobilizing and supporting ambitious, measurable, and planned climate and energy action in their communities.

|| Hazards:

- ▶ the potential occurrence of a natural or human-induced physical event or trend that may cause loss of life, injury, or other health impacts, as well as damage and loss to property, infrastructure, livelihoods, service provision, ecosystems and environmental resources.

|| Pathways:

- ▶ The temporal evolution of natural and/or human systems towards a future state. Pathway concepts range from sets of quantitative and qualitative scenarios or narratives of potential futures to solution-oriented decision-making processes to achieve desirable societal goals.

|| Resilience:

- ▶ The capacity of social, economic and environmental systems to cope with a hazardous event or trend or disturbance, responding or reorganising in ways that maintain their essential function, identity and structure, while also maintaining the capacity for adaptation, learning and transformation.

|| Risk:

- ▶ The potential for adverse consequences where something of value is at stake and where the occurrence and degree of an outcome is uncertain. In the context of the assessment of climate impacts, the term risk is often used to refer to the potential for adverse consequences of a climate-related hazard, or of adaptation or mitigation responses to such a hazard, on lives, livelihoods, health and wellbeing, ecosystems and species, economic, social and cultural assets, services (including ecosystem services), and infrastructure. Risk results from the interaction of vulnerability (of the affected system), its exposure over time (to the hazard), as well as the (climate-related) hazard and the likelihood of its occurrence

|| (Climate change) roadmap:

- ▶ A climate change roadmap is an ever-evolving document, which seeks to push the agenda for further action on climate change.

|| Social vulnerability:

- ▶ comes about through the interaction of a number of personal, environmental and social factors that affect the way in which climate hazards impact on the well-being of individuals or groups.
- ▶ Personal features of the individual such as age and health.
- ▶ Environmental characteristics such as the availability of green space or quality of housing.
- ▶ Social and institutional context, such as levels of inequality and income, the strength of social networks, the cohesion of neighbourhoods and the day-to-day practices of institutions.

|| Vulnerability:

- ▶ The propensity or predisposition to be adversely affected. Vulnerability encompasses a variety of concepts and elements including sensitivity or susceptibility to harm and lack of capacity to cope and adapt.

|| Weather:

- ▶ Weather refers to short term atmospheric conditions (ranging from days to months).

Definitions taken from IPCC glossary reports unless otherwise stated.

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Gloucester City Council

Meeting:	Cabinet Council	Date:	6 March 2024 21 March 2024
Subject:	Gloucester City Centre Conservation Area Appraisal and Management Plan		
Report Of:	Cabinet Member for Planning and Housing Strategy		
Wards Affected:	Westgate		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Ullin Jodah McStea, Principal Conservation Officer		
	E:	ullin.jodahmcstea@gloucester.gov.uk	01452 396794
Appendices:	1. Gloucester City Centre Conservation Area Appraisal and Management Plan 2. Public Consultation Report and Officer Comments.		

FOR GENERAL RELEASE

1.0 Purpose of Report

- 1.1 To seek approval for the adoption of the updated draft of the City Centre Conservation Area Appraisal and Management Plan as a Supplementary Planning Document. (Appendix 1)

2.0 Recommendations

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

- (1) The City Centre Conservation Area Appraisal and Management Plan be approved as a Supplementary Planning Document with immediate effect.
- (2) The alteration of the boundary of the city centre conservation area be approved.
- (3) Authority be delegated to the Head of Place, in consultation with the Cabinet Member for Planning and Housing, to obtain graphic design input for the layout of the document, add additional photographs and maps to the document, and to make any other necessary minor amendments, corrections and additions to the document prior to publication.

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

- (1) The City Centre Conservation Area Appraisal and Management Plan is approved as a Supplementary Planning Document with immediate effect.
- (2) The alteration of the boundary of the city centre conservation area be approved.

(3) Authority is delegated to the Head of Place, in consultation with the Cabinet Member for Planning and Housing, to obtain graphic design input for the layout of the document, add additional photographs and maps to the document, and to make any other necessary minor amendments, corrections and additions to the document prior to publication.

3.0 Background and Key Issues

- 3.1 The purpose of this report is to seek approval from Council for the adoption of the Gloucester City Centre Conservation Area Appraisal and Management Plan (Appendix 1).
- 3.2 The document was originally drafted by the Council's Principal Conservation officer, Ullin Jodah McStea drawing on consultancy advice commissioned from Donald Insall Associates, Chartered Architects and Historic Buildings Consultants. Following approval from Cabinet, it has been amended in the light of comments received in the 8-week public consultation which took place between October and December 2023.
- 3.3 The public consultation included public meetings (to comply with the requirements of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 Section 71), a 'drop in' stand at Eastgate Shopping Centre, meetings with stakeholder groups and a mail out to all the residents within the conservation area. The mail out, as well as information provided on the internet and social media, informed the public of how and where they could gain more information, as well as how and where they could respond to the consultation. Options to view the draft document virtually, or as a hard copy were also provided, as were options to respond.
- 3.4 The period of public consultation ended on December 20th2023. All comments received were then collated and a Consultation and Adoption Report has been produced, a copy of which is attached as Appendix 2. These reports not only detail the comments received, but also what action was taken as a result. Officer comments are also included within the report.
- 3.5 Changes to the Conservation Area Appraisal and Management Proposals in the light of the consultation responses include:
- Redrafting of the text on changes to the conservation area boundary on Westgate Street.
 - Review and updating of the SWOT analysis.
 - Language in Management Plan amended to aid clarity and avoid confusion.
- 3.6 The Conservation Area Appraisal and Management Proposals is to be adopted as a Supplementary Planning Document of Policy SD8 'Historic Environment' of the adopted Joint Core Strategy (2017), and Policy D1 'Historic Environment' of the adopted Gloucester City Plan (2023).
- 3.7 Once adopted, it will replace the 2007 City Centre Conservation Area Appraisal and Management Proposals.

4.0 Social Value Considerations

- 4.1 The adoption of an updated Appraisal and Management Plan that has been subject to public consultation will strengthen the Council's ability to extract social value from development schemes in the area.

5.0 Environmental Implications

- 5.1 The Appraisal provides interpretation and context as well as a framework to further the protection and enhancement of the environment. The document deals mainly with the built environment, including buildings of architectural merit and heritage importance, and it also acknowledges the importance of the public realm and areas of open and green space within the conservation area. Sustainability and issues of climate change have also been considered in the preparation of this document.

6.0 Alternative Options Considered

- 6.1 To continue without updating the Appraisal and Management Plan. The extant document, produced in 2007 would become increasingly outdated and irrelevant, potentially exposing the Council to challenge and resistance to its efforts to improve the city centre.

7.0 Reasons for Recommendations

- 7.1 To strengthen and update the relevance of the Gloucester City Centre Conservation Area Appraisal and Management Plan.

8.0 Future Work and Conclusions

- 8.1 If Members are minded to follow the recommendations of this report, the new boundaries of the conservation areas and the two newly designated areas will have to be advertised in the format given in both legislation and government guidance.
- 8.2 If Members are minded to adopt the updated draft of the City Centre Conservation Area Appraisal and Management Plan as SPD, there will again be a requirement to make suitable announcement of this, and again Legislation and government guidance dictates the format that such notification and publicity must take.
- 8.3 If the appraisal is adopted, then the management proposals within will become a material consideration for consideration of planning applications for buildings or sites within the conservation areas.

9.0 Financial Implications

- 9.1 There are no direct financial implications arising from this report

10.0 Legal Implications

- 11.1 It is a statutory requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 for a local planning authority from time to time to review parts of their area that are designated as conservations areas and to draw up and publish proposals for the preservation and enhancement of the conservation areas. In so

doing there is a duty to consult the local community on the proposals, including the holding of a public meeting, and for the local planning authority to have regard of the views expressed by consultees. Appendix 2 outlines the results of the consultation and the action taken.

- 11.2 In order for the City Centre Conservation Area Appraisal and Management Plan to be adopted as a supplementary planning document the requirements of the Town and Country Planning (Local Planning)(England) Regulations 2012 as amended and the Council's Statement of Community Involvement should be followed. At this a consultation and adoption report is required and this has been produced as Appendix 2. Following the adoption resolution by the Council the new supplementary planning document will need to be publicised in accordance with the aforementioned regulations.

One Legal has been consulted on this report

11.0 Risk & Opportunity Management Implications

- 11.1 N/A.

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 There are no direct safety implications as a result of this report.

14.0 Staffing & Trade Union Implications

- 14.1 None.

Background documents: None

Gloucester City Centre Conservation Area Appraisal and Management Plan.

Update draft following public consultation. 01.02.2024

Please note, all amendments are highlighted in blue.

1. Introduction
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 - 1.2 The Conservation Area Appraisal and Management Plan and its purpose
 - 1.3 How it will be used
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1.1 What is a Conservation Area?

A conservation area is 'an area of special architectural or historic interest the character and appearance of which it is desirable to preserve or enhance' as set out in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

When dealing with planning applications in conservation areas the Local Authority is required to ensure that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area' (Section 72); the Local Authority also has a duty 'from time to time to formulate and publish proposals for the preservation and enhancement or any parts of their area which are Conservation Areas' (Section 71).

The Planning (Listed Buildings and Conservation Areas) Act 1990 prevents the demolition of buildings in conservation areas without consent and allows for the

service of 'Repair Notices' for vacant buildings in a similar way to those for listed buildings.

These sections of the 1990 Planning Act form the foundation for Gloucester City Council to manage the built environment in such a way as to retain the special qualities of their conservation areas. There are, however, a wide range of legislation, national guidance additional guidance and local and national policy documents which assist in this task. They deal with other types of heritage asset, such as listed buildings, additional controls to supplement those included in the 1990 Act (often called Article 4 Directions), various types of repair and enforcement notices, and advice on how to assess the impact of development on the setting of an area or building.

Consequently, it is important that this document is read in conjunction with additional guidance and local and national policy documents. Where applicable, links have been provided to the documents to provide additional guidance. This appraisal forms part of the Council's Historic Environment Record and evidence base for the Local Plan. It is essential that any management plan supports a modern community and is considerate of social and economic factors. In view of this consultations **have been** undertaken during the appraisal process, and these will impact on the formulation of the management policies outlined later in this document.

1.2 The Conservation Area Appraisal and Management Plan and its Purpose

This appraisal has been prepared by Gloucester City Council, with input from Donald Insall Associates; it has been funded through the Cathedral Quarter High Street Heritage Action Zone (HSHAZ).

The appraisal is set out in 3 parts:

1. Understanding the area: This consists of a brief summary of the area, its historic development, its significance and components. Much of this has been compiled from third party documents, including the 2007 Conservation Area Appraisal
2. Site appraisal: The conservation area is divided into four character areas. The key elements of each character area, and how they contribute to the character and significance of the conservation area, will be outlined and appraised. The strengths, weaknesses, opportunities and threats in relation to each character area will also be assessed and used to inform the final section of the document.
3. Management of change: This section will set out a series of principles to help guide future development whilst ensuring that the special character of the area is preserved and where possible enhanced.

1.3 How it will be used

A conservation area appraisal defines the special interest of the conservation area that merits its designation and describes and evaluates the contribution made by the different features to its character and appearance. It will be used by council officers and Members when considering applications for development, but also as a guide for developers, owners, and tenants in preparing proposals which are in line with

national legislation and guidance and local policy on the protection of conservation areas. The appraisal also seeks to understand the City Centre Conservation Area's capacity for change and its potential to meet local development needs and pressures. This appraisal aims to increase the appreciation and understanding of the conservation area and help businesses, tenants and owners understand the legislation that protects this complex historic city.

1.4 Consultation process

It is a statutory requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 for conservation area guidance produced by or on behalf of the Council to be subject to public consultation, including a public meeting, and for the local authority to have regard to the views expressed by consultees. Public consultation has been undertaken at various stages through the production of this appraisal, including at the beginning of the process; a draft of the appraisal has also gone out to public consultation. This public consultation has been vital in understanding the thoughts, issues and pressures which face the City Centre Conservation Area from those who live, work, and use the area, as well as the local authority who are responsible for the administration of planning policy to ensure that its character or appearance is preserved or enhanced.

Groups which were informed of the consultation or specifically consulted include:

Gloucester Business Improvement District

Gloucester Housing Strategy Team

Gloucester City Council Planning Officers

Gloucester Heritage Team

Gloucester City Council Cabinet Members

Gloucester Culture Trust Gloucester Development Forum

University of Gloucestershire

Gloucester Civic Trust

The residents of the City Centre Conservation Area

The results of these consultations have informed the preparation of this document.

1.5 Regeneration context

At the time of this review, the Cathedral Quarter HSHAZ is approaching its final stages. Having been awarded £1.9m in funding from Historic England, this scheme has delivered change to part of Westgate Street providing grants to property owners for renovation and refurbishment of shopfronts and the conversion of vacant upper floors to residential use, as well as delivering improvements to the public realm. It is the intention that the work completed through the HSHAZ will encourage further regeneration as well as educate residents and owners as to the benefit of investment in heritage and good design. This will have an impact on the current condition of Westgate Street and its environs and should be assessed during the next conservation area appraisal review. At this point in time 14 facades/shopfronts have been

restored/renovated, and 5 new upper floor residential units created as a part of this scheme.

However, despite the HSHAZ interventions, and the undoubted improvements that it has delivered, there remains considerable uncertainty regarding the future direction of high streets, with many believing that these areas need to provide more than retail to encourage visitors.

A Townscape Heritage Initiative was awarded to Southgate Street to improve the area from St Mary DeCrypt Church to the southern end of Southgate Street in 2013. This has now concluded and there is a large improvement which is reflected in this review.

Current and Recent Regeneration Schemes

There are several large-scale developments underway in the City Centre Conservation Area, and a number completed since the 2007 appraisal. These include the demolition of the Gloucester Technical College and the redevelopment of Greyfriars (Friars Orchard Scheme).

There is also significant regeneration underway in the King's Quarter of the city centre, an area which includes part of the City Centre Conservation Area. This £200m+ city council led regeneration project, supported by £20 million in Levelling Up funding, is providing a new mixed development in that area of the city. Within the conservation area the former Debenhams site is being repurposed by the University of Gloucester. This building has one of the largest footprints in the city centre and its repurposing will bring 4 500 students and hundreds of new jobs to the area. Work is now underway to create the Forum, a mixed use office, hotel, leisure, retail and residential development on the edge of King's Square, just outside the conservation area. All schemes are due for completion in 2024.

Whilst the Longsmith Street Carpark is currently out of use, its planned closure as part of the regeneration of the Fleece Hotel site is currently on hold, with uncertainty facing the future of this important historic site.

The regeneration initiatives above aim to revitalise historically significant as well as negative parts of the conservation area, which it is hoped will encourage further regeneration. The impacts of these should be assessed within the next review of this document to understand the full effects of these projects and how they may inform future phases of development.

1.6 National and Local Policy Context The obligations of local planning authorities towards conservation areas within the legislative process have already been outlined at the start of this document, however there is considerable policy, both national and local, which provides more details on how legislation should be implemented. The National Planning Policy Framework (NPPF) 2023 provides national policy. Protecting and enhancing the historic environment is a key component of the NPPF's drive to achieve sustainable development.

Section 16 of the NPPF, 'Conserving and enhancing the historic environment' sets out the heritage framework in detail in relation to various 'heritage assets'. Conservation Areas are referred to as designated heritage assets in the NPPF. Both the Joint Core

Strategy (produced in partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, setting out a planning framework for all three areas and adopted in December 2017) and the Gloucester City Plan (adopted in January 2023) refer to designated heritage assets. Policy SD8 in the Joint Core Strategy concerns the historic environment and it states that 'Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment' and that 'Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place...Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation'. Policy D1 of the Gloucester City Plan focuses on the historic environment; it states that

'Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings'

2.1 Significance of the site

The City Centre Conservation Area lies between The Docks and the Cathedral Precinct and encompasses the main retail core of the city. The four principal streets meet at The Cross, reflecting their Roman origin, and the boundary of the conservation area follows the line of the former Roman wall, now lost below later development. The grid pattern of streets and back lanes are predominantly laid out on the Roman plan. In the north-east and the south-east quadrants, these have been overlaid by post-war development which created two large shopping centres.

The conservation area retains a high number of historic buildings, dating from the 11th century onwards. Medieval churches, and former merchants' houses, many with fine timber-framed frontages, can be found in the main streets, of which Westgate Street is the most intact. There are also some noticeable examples of high-quality 20th Century development, including the former Debenhams built between 1928 and 1931, the Oxbode and HSBC Bank built in the 1960s.

The key characteristics of the City Centre Conservation Area are summarised below:

1. The centre of Gloucester City, located between The Docks and the Cathedral Precinct
2. High density of commercial, local government and cultural uses with a growing number of residential properties
3. Primary shopping frontages along the Gate Streets
4. Retains the Roman street layout, overlaid by Saxon development, of the four main streets meeting at The Cross
5. Surviving Romans remains, exposed and below ground. For example the King's Bastion and the footings of the East Gate, as well as Roman wall remains within a retail premises on Southgate Street.

6. Back lanes and alleys, where they survive, on a grid pattern with some remains of medieval burgage plots
7. Two outstanding 12th Century friaries – Blackfriars and Greyfriars as well as several other scheduled sites without above ground remains
8. A high number of grade 1 and 2* listed buildings dating between the 11th and 19th centuries, the highest concentration of which is in Westgate Street
9. Several very early medieval churches – St Mary Decrypt, St Nicholas Church, St John the Baptist and St Michael's Church
10. Survival of several medieval stone undercrofts in Westgate Street associated with wealthy merchants' houses
11. Several outstanding timber-framed houses and Inns of the 15th-17th centuries, including The New Inn in Northgate Street, listed grade I
12. Some high-quality examples of 20th Century design

2.2 Boundary alterations

As a part of the appraisal process, two small extensions to the City Centre Conservation Area were put forward for inclusion and subsequently accepted. These areas, and the reason for their inclusion within the City Centre Conservation Area, are:

Area 1 – Area on the northern side of Westgate Street

The area to the northern side of Westgate Street, which comprise the garden at the front of the Dukeries and the open space to the east of the corner with Archdeacon Street, was outside the network of conservation areas which surround Gloucester's city centre, though still a space that has historic value.

As a part of Westgate Street, the designation site is a space that provides further evidence of Gloucester's historic layout in particular its medieval street plan. Some of this is clearly visible above ground, in terms of the continuation of Westgate Street through this space, however, there are also records of below ground remains, for example Gloucester's Historic Environment Record notes evidence of the Foreign Bridge being observed in this area.

As well as its historic value, the character of the designation site (it is an open space with a number of street trees but no buildings) makes a positive contribution to this part of the city centre. It is a part of the setting of a number of highly graded listed buildings, for example the grade I listed St Nicholas's Church and the grade II* 'Folk of Gloucester', but it also provides a rare area of openness and greenery within Gloucester's urban heart. It also acts as a buffer between a number of important historic buildings and some of Gloucester's less sympathetic modern development.

Area 2 – Bearland House, Bearland Lodge, numbers 41,43,45, 47,49 Longsmith Street.

Bearland House and Lodge are impressive 18th century houses which, alongside numbers 41-49 Longsmith Street, were within the Barbican Conservation Area. Because it was felt that the domestic character of this range of buildings responds more to the architectural character of the City Centre Conservation Area, rather than

the Barbican Conservation Area which is dominated by Gloucester Prison, the boundary between the two was redrawn to bring these buildings into the former.

2.3 Location Gloucester is the county town of Gloucestershire, with Cheltenham located 10 miles to the east, Tewkesbury 15 miles to the north and the Forest of Dean to the west. To the south is Stroud and the Cotswold escarpment, which rises steeply from the plain. This is crossed by the M5 motorway, connecting the north of England to Bristol, Bath and the southwest. The City Centre Conservation Area is the historic core of Gloucester and provides the majority of its primary and secondary shopping frontages. It is a vibrant part of the city offering day and night-time activities and a mix of uses. The form of the conservation area is largely established by its historic layout which remains intact, forming a loose grid of routes.

2.4 Topography, geology and landscape Central Gloucestershire itself is located on a spur of higher ground just above the floodplain of the River Severn. The city lies on lower lias clay and gravels in the Vale of Gloucestershire. To the north, west and south the terrain is low lying, but the Cotswold escarpment, along with the outlying Robinswood Hill and Churchdown Hill, rises steeply to the east, around 5 miles from the city centre.

Within the City Centre Conservation Area, contours confirm that there is a high spot close to the crossing point of the four main streets, with the steepest slope occurring on the west side of Ladybellegate Street. The change in gradient is also noticeable along Westgate Street, which drops gradually towards the river. Until the 19th Century, the River Twyver or Fullbrook ran westwards along the north side of St Aldate Street (forming the northern ditch of the medieval city) and into what was Mill Lane but has long since been culverted. The River Severn has changed course several times; the eastern branch of the Severn silted up and a new branch developed further west.

2.5 Relationship of the Conservation Area to its surroundings

The wider city is divided into 14 conservation areas with the City Centre the most central. Immediately to the north is the Cathedral Precincts Conservation Area which is linked to Westgate Street by College Street and which provides important open spaces which are surrounded by highly graded historic buildings. To the west is the Barbican Conservation Area, which includes the southern elevation of Longsmith Street and the western elevation of Ladybellegate Street. To the southwest, beyond Commercial Road, lies the historic docks surrounded by the vast warehouses of the Docks Conservation Area. Continuing east is the Southgate Conservation Area which is an area of mixed commercial and residential development. The Spa Conservation Area wraps around the southwest edge of the city centre, with its elegant Regency terraces and open green spaces. Finally, to the east, the boundary abuts the Eastgate and St Michael's Conservation Area, comprising mainly 19th century development along outer Eastgate Street and Cromwell Street residential areas.

The City Centre Conservation Area is partially pedestrianised so vehicular access to its core is limited. The pedestrianisation scheme creates a pleasant shopping environment for the four main streets, with car parking situated around the edges. There are both surface and multi-storey car parking facilities off Ladybellegate Street; There is roof car parking above Eastgate Shopping Centre and to one side of King's

Square. There is an important pedestrian link from Brunswick Road to Southgate Street, past Greyfriars, which also connects into Eastgate Shopping Centre and the adjoining covered market. The principle vehicular entrances into the City Centre Conservation Area are from Royal Oak Road and The Quays, leading into public car parking and the county council offices in Quay Street. The Inner Relief Road wraps around the city centre on the northern, eastern, and south-eastern sides, feeding into the parking for the two shopping centres and into Lower Eastgate Street, to the two surface carparks off Hampden Way. There is a pedestrian route from King's Square towards the railway and bus station.

2.6 Archaeology There are a high number of scheduled monuments within the City Centre Conservation Area which are shown on the following link [Search the List: Map Search | Historic England](#). Most of these lie below existing buildings. The best preserved above ground remains are the buildings and ruins of Blackfriars and Greyfriars. Both consist of considerable standing remains with Blackfriars considered to be the most complete Dominican Friary on a national basis. Any substantial groundworks within the conservation area have the potential to impact archaeological remains of national importance whether scheduled or not.

2.7 Historic development

The name Gloucester is derived from the Roman name Glevum, combined with the suffix 'cester', which means a Roman walled settlement or fortress. The City Centre Conservation Area forms the historic core of Gloucester, and the boundaries largely follow the lines of the Roman city walls, later used by both Saxons and Normans until largely demolished in the Civil War of the mid-17th Century.

The historical development of the city has been covered in detail in a variety of publications, references of which are included within the bibliography. The principal features of the historic development of the City Centre Conservation Area are as follows:

Roman

Roman occupation commences in AD48 when a Roman fortress was constructed at Kingsholme, taking advantage of the lowest bridging point of the River Severn;

A new fortress is established on the site of Gloucester city centre around AD 57 which by AD 97 had become a Roman 'Colonia' or veteran settlement on the same footprint;

The cross plan of the streets was laid out, with the Gate Streets largely aligned along the Roman layout;

The forum and basilica lay alongside Southgate Street;

A suburb developed on land to the west, reclaimed from the river;

Roman Gloucester survives as an urban centre into the 5th century. It's status during the 6th and early 7th century is unclear and it may have continued as a partly occupied central place during the dark ages.

Anglo-Saxon and Norman

In 679 the Christian king of the Hwicce's, Osric, founded a minster in Gloucester which was rebuilt in 823;

New streets laid out in the 9th Century, many of which remain, and the town walls were refortified;

Queen Aethelfleda founded St Oswald's Priory in around 900;

This 'Old Castle' and was probably a ringwork type structure utilising part of the city walls. It probably developed into a 'Mottle and Bailey' type castle after some years. The 'Old Castle' was built in the early 12th century close to the river, and Gloucester grew due to its location. The market and mint developed as a response to this.

The Abbey of St Peter, which stood on the old Minster site, re-founded by William in 1072, became one of the principle Benedictine centres in England.

Medieval

Henry III was crowned in St Peter's Abbey in 1216;

Greyfriars was established in 1231, Blackfriars in 1239 and Whitefriars in about 1268;

Gloucester's wealth derived principally from the making of wool cloth;

Long, thin burgage plots were laid out along the principal streets, to promote development;

Westgate Street contained the market, several churches, the mint and a number of vaulted stone merchant's undercrofts constructed in the prosperous late 12th and early 13th Centuries;

Southgate contained the fish and corn markets;

Eastgate Street was the Jewish Quarter until the Jews were expelled in 1275;

Northgate Street contained another market and was lined with shops;

St Peter's Abbey was rebuilt and extended in the 14th Century.

Tudor and Jacobean

In the late 1530s due to the dissolution of the monasteries, the power of the church diminished and Gloucester became notable for its markets and manufacturing;

The Bluecoat School was built in 1566 in Eastgate Street;

Gloucester became a significant port, helped by improvements to Gloucester Quay;

In 1643 the Civil War resulted in the demolition of the suburbs to the south, east and north;

Gloucester declined in the late 17th Century as the textile industry became less important, although new industries, such as metal working, developed.

Georgian

Gloucester prospered as roads improved and river borne trade through Bristol increased;

The quayside facing the River Severn continues as an important part of the city's economy;

The city centre roads widened with Eastgate demolished in 1778 and the remaining gates in 1781;

New markets were built off Eastgate Street and Southgate Street in 1786;

Existing buildings were re-fronted in fashionable brick;

New public buildings were constructed;

A new gaol was built on the site of the Norman castle in 1788.

Regency

A new spa developed to the south of the city centre after 1814, providing a short-lived impetus to the building of new shops in the city centre. It was eventually closed in the 1830s;

Gloucester and Berkeley Canal opened in 1827, which meant that by 1900 Gloucester had become one of the largest and most profitable ports in the country;

The first basin in Gloucester docks was constructed in 1812 with warehouses built from 1826 onwards;

Grain and timber became the most important imports.

Victorian

Between 1840 and 1900 the Docks continued to expand, providing Gloucester with its principal source of income;

Birmingham and Gloucester railway arrived in 1840;

The volume of canal borne traffic peaked in about 1850, but decreased rapidly after the railways developed, providing links to Birmingham, Swindon and Bristol;

In 1849 St Michael's Cross was demolished and rebuilt to one side;

In 1855 Eastgate market was rebuilt;

Gloucester Wagon Works was developed in the 1860s

In 1872 the School for Science and Art in Brunswick Road was completed, shortly followed by the public library and Price Memorial Hall (later the museum) which were added on either side

The middle classes moved out of the city centre and new residential suburbs developed outside the historic core;

In the late 19th Century, banks, offices, and larger stores moved into the city centre;

In the 1890s the new Guildhall was built in Eastgate Street, on the site of the former Bluecoat School.

20th Century

In 1900 the buildings between Commercial Road and Ladybellegate Street were demolished for the new electricity works;

Between 1901-1907 there was rebuilding around The Cross to ease congestion;

By 1914, the city centre had become almost entirely commercial;

In the 1920s and 1930s, buildings were demolished in Northgate and Eastgate Streets for new development; this includes the construction of Debenhams which was built between 1928-1931;

New buildings including The Technical College in Brunswick Road (1938-41 but now demolished) and the Central Post Office in The Oxeboode (1934) were built;

The city escaped major damage during the Second World War;

New housing was built in the 1930s and 1950s/60s including the Fountain Square area at the western end of Westgate Street;

St Michael's Cross was removed from the city centre in the 1950s

The late 1950s saw the completion of the bypass. In 1962, Bruton Way became the first section of the Inner Relief Road to be opened, with the Kimbrose gyratory system completed at the end of Southgate Street in the early 1960s. The opening of the Severn Bridge in 1966 removed through traffic from South Wales and was further relieved by the opening of the M5 in 1971;

G A Jellicoe's Plan of 1962 led to the demolition of much of the medieval streets and buildings in the northeast and southeast quadrants, to provide the Eastgate Shopping Centre (1966-1974) and King's Square (1969- 1972.), served by the rooftop car parking and linked across Eastgate Street by a first floor bridge;

Jellicoe's Plan also allowed for the creation of a Via Sacra, a pedestrian route linking the cathedral and other historic sites of the main shopping area;

The County Hall buildings off Westgate Street were constructed in the late 1960/70s;

The portico to the old Eastgate Market was moved to form a new entrance to the Eastgate Shopping Centre in 1973;

Periodic development in the 1970s and 1980s saw the demolition of some of Gloucester's best Non-Conformist churches and also the replacement of the Gloucestershire Infirmary in lower Southgate Street with Southgate House;

21st Century

The Gloucester Technical College was demolished in 2011 to enable residential development in the form of the Friars Orchard scheme.

3. Character Areas

Within a conservation area, it is sometimes possible to identify parts of the area which differ in character. Key factors in defining where one part of the conservation area differs from another include the density of buildings, their relationship to one another, the street layout and the historic pattern of development. Where clear differences do exist, these are identified as 'character-areas' and the conservation area is examined using those sub-areas. Four areas have been identified as being 'character-areas' within the City Centre Conservation Area. The areas reflect the historical evolution of the city, and the pattern of development in different areas. The character areas are as follows:

1. The Gate Streets
2. Brunswick Road, Greyfriars and Eastgate
3. Quay Street, Longsmith Street and Ladybellegate Street
4. King's Square and King's Walk

3.1 The Gate Streets

The Gate Streets Character Area comprises Westgate Street, Eastgate Street, Southgate Street and Northgate Street from their intersection at The Cross, extending outwards to Lower Quay Street (Westgate Street), no. 12 (Eastgate Street), Kimbrose Way (Southgate Street) and St Aldate Street (Northgate Street). With elements of the Roman, Saxon and Medieval town plan still clearly evident, in the form of the street layout, burgage plots and hidden alleyways, part of the Gate Streets character and importance lies in its historic origins and plan form. This is supplemented and enriched by the area's historic buildings, whose variety and quality are exceptional. Dating from the 12th to the 20th century, the historic buildings of the Gate Streets character area include medieval friaries and churches, buildings with medieval undercrofts, a number of outstanding timber framed buildings, some of which have been refronted, as well as more recent 19th and 20th century buildings of note. The most complete and unaltered of the Gate Streets is Westgate Street, which contains a rich mix of well detailed historic buildings with limited modern infill. Overlaying this historic environment is the everyday modern hustle and bustle of a city centre shopping area, which adds its own unique character to this special place.

3.1.1 TOWNSCAPE CHARACTER

Townscape refers to the arrangement and appearance of buildings, spaces and other physical features in both the built and natural environments

Layout and plan form

The layout of the space within the Gate Streets character area is defined by the historic development of Gloucester, in particular the intersection of the Roman streets at the Cross, which were subsequently overlaid by Saxon development. The surviving back lanes and alleyways, on a grid pattern with some remains of medieval burgage plots, also contribute to this.

The Gate Streets are generally characterised by a tight urban grain, though there is considerable variation in the width of the principal streets themselves; this variation reflects the sites of medieval markets or island buildings which were demolished as part of highway improvements, some of which started as early as the 18th century. Today it is an area dominated by retail, one that is predominantly pedestrianised, with vehicular access limited to this space for much of the day. As such part of the character within this part of the conservation area lies in the shopfronts and the activity bought by visitors, workers, and shoppers. There is no one style or age of building predominant within this compact area, with buildings ranging in age, scale, material and design. The far-reaching views which converge at the Cross allows the consideration of these streets as a group.

Land uses

Historically, many buildings within the Gate Streets would have been occupied by family businesses with residences above, but from the 18th Century onwards, as the docks developed, so did the city, with residential growth moving towards the suburbs of the Spa and London Road. New buildings were constructed for governmental, administrative, manufacturing, or commercial uses. More recent development, for example the construction of the 1960s shopping centres, resulted in the further loss of residences, so that today, there are relatively few homes in within this part of the city centre. Moves to encourage the residential use of the oftenuvacant upper floors within parts of the character area are currently being undertaken as part of the Gloucester's Cathedral Quarter HSHAZ; the repopulation of the city centre is a wider aim of the city council. Whilst the Gate Streets are dominated by retail premises, there are also buildings accommodating other services such as banking, hospitality or entertainment; there are also several religious buildings throughout the character area, with active worship remaining in Southgate Street and Northgate Street. Administrative services can be found at Shire Hall. The Debenhams building, a

substantial site which bridges both the Gate Streets and the King's Square character areas, is currently undergoing conversion to enable its use by the University of Gloucester as a teaching site. The reuse of this important prominent site is a positive step, one that will revitalise this part of the conservation area.

Building density, scale and proportions

Westgate Street

Within Westgate Street the density of its built form increases as it progresses towards the Cross, with the eastern end of this historic thoroughfare showing a greater concentration of buildings than the more disjointed western end. The building line is also varied, with features such as St Nicholas Church, positioned at an angle on the northern side of the street, the jetties of the Folk and No 66 and the recessed portico of Shire Hall, all adding variety to the street scene. There are a number of street trees at the lower end of Westgate Street.

The scale and proportion of the buildings on Westgate Street add texture to the street scene. Whilst there are a handful of substantial and imposing 19th and 20th century buildings on Westgate Street, for example Shire Hall and, on the corner, 1-3 Northgate Street, many of the other buildings on this historic route are more domestic in scale, varying between 2 and 4 storeys in height, occupying narrow plots and presenting an unbroken line to the street; they are also mainly historic, and most have a shopfront at ground floor level, though the quality of these varies. Positive examples can be found at 19, 64 and 66 where good quality late 19th Century shopfronts remain.

Above the shopfronts facades are diverse, whilst the roofscape, with its varied heights and features such as parapets, gables and both plain and decorative dormers, increase interest. It is the variations within Westgate Street, and the glimpses to what lies beyond, that give this historic route its immense character, richness and architectural diversity.

To the north of Westgate Street is College Street, which, with its modest simple 15th century timber framed buildings sitting opposite a substantial decorated 3 storey Victorian row, provides an iconic view of Gloucester's 11th century Cathedral. Close by the narrow College Court provides a more enclosed feel; the medieval ogee arched gateway, made famous by Beatrix Potter in *The Tailor of Gloucester*, is a particular feature in this space.

Eastgate Street

In contrast Eastgate Street is characterised by late 20th century redevelopment. Common characteristics in these buildings include substantial plot sizes, buildings of 2 to 3 stories, flat roofs and, in a number of cases, large overhangs. The tendency towards brutalism in this area, the proportions of the buildings, their massing and the lack of variety in the roofscape, are at odds with the range and scale of the buildings on Southgate and Westgate Street. There are some exceptions to this, for example at Nos 19-23, two late 19th century banks and the Guildhall, which are notable as surviving examples of earlier buildings. However, the predominance of late 20th century development which surrounds them makes them appear isolated.

Northgate Street

Whilst the range of buildings in Northgate Street is diverse in terms of age and architectural style, many of them are 3 storeys in height. Exceptions to this include Nos 6-10 Northgate Street, which is 4 storey and the Debenhams site, the latter of which marks the intersection with the Oxbode. There are also 2 storey buildings on Northgate Street, at numbers 35 and 37, though these modest buildings appear out of character with the rest of the street scene. Plot sizes too vary, from modest single ones to the property currently housing TK Maxx, which is at least 10 bays in width. The building line to each side of Northgate Street is predominantly consistent, with a notable exception at The New Inn which has a jettied first and second floor. On the opposite side of the road, the Church of St John is set slightly back and marks the turning from Northgate Street onto St Johns Lane. Buildings along this side street are mainly 2 and 3 storeys in height and are less condensed, with regular breaks to the building line. These breaks provide glimpsed and far-reaching views towards the Cathedral. Whilst there is great variety in terms of building age and style on Northgate Street, the overall impression is one of a more consistent street scene than the neighbouring Westgate Street.

Southgate Street

With St Michael's Tower and St Mary De Crypt positioned along it, as well as a combination of modern, historic, stone faced and timber framed buildings, there is considerable variety amongst the buildings that line Southgate Street. Whilst buildings do not generally exceed 4 storeys in height, the plot size, and the building line is varied, as is the roofscape, with chimneys, decorative turrets, ornate gables, differing roof lines and church towers all clearly visible and providing enrichment to this historic street.

As well as being a focal point within the streetscene, St Mary De Crypt marks the entrance to Greyfriars, and provides a break from the otherwise tight urban grain. Its tower also provides a noticeable landmark, which alongside St Michael's tower, effectively bookmarks the street at St Mary's. The community facilities and green space provide space for rest, assembly and an easily understood historic landmark,

all of which have been enhanced through recent work. Unfortunately it is also an area where anti social behaviour is evident.

The triangle formed at the southern end of Southgate Street by its connection to Commercial Road and Kimbrose Way also has a tight urban grain, however in this location a public open space has been created. Bearing in mind this area overlooks private spaces, rear gardens and rear elevations and is only partially screened by a piece of street art, it remains an unusual and perhaps incongruous feature of the conservation area.

Slightly to the west of the southern end of Southgate Street is Blackfriars' Priory. The presence of this historic monastic site not only provides further variation in terms of plot size, scale and proportions, the fact that it sits comfortably within its own grounds and is bordered on one side by a Georgian terrace which has retained its front gardens and historic boundary treatment gives a more open feel and diminishes the density of this part of the character area.

Alleyways and backstreets

A feature of the Gate Streets, in particular Westgate Street, are the small back lanes that were laid out during the Saxon period when the city is known to have been replanned with a grid of streets and a series of secondary routes. These offer a different perspective to the busy urban character of the Gate Streets, typically narrower but often with glimpsed views to rear elevations and a range of smaller scale buildings, both domestic and commercial. A number of these routes have been overlooked and are now suffering from deterioration. Typical issues include lack of lighting, poor repair, insensitive infill development, blocking of historic openings and the installation of security grilles. routes have been overlooked and are now suffering from deterioration. This has led to anti-social behaviour and their use for refuse storage which deters pedestrian use. Examples of the back lanes and alleyways within this character area include:

- Bull Lane

- Maverdine Lane

- St John's Lane

- College Court

- Cross Keys Lane

- Alley to the east of 11 Westgate Street – Pinchbelly Alley

- Alley to the north of the New Inn

Views

Views within the Gate Streets are varied and diverse, with key views from the Cross looking outwards along each of the four main streets. The view along Northgate Street is perhaps the shortest of these, because the road curves as it heads outwards, whilst the view along Westgate Street is longer. This important view, which is enabled by the linear form of the street and the way it falls away as it heads westwards, contains the architecturally diverse buildings that line the street as well as more distant elements; on clear days, the Malvern Hills can be seen from parts of Westgate Street. (A map and photographs showing some of the City Centre Conservation Areas most important distant views can be found on page X)

Enclosed views, for examples along Bull Lane and College Court can also be found in close proximity to Westgate Street, whilst along College Street is a terminated view, with the Cathedral providing the focal point. The Cathedral also provides a background to a deflected view up St Johns Lane from Northgate Street, which entices the observer to explore further.

Southgate Street offers long ranging views north and south, framed to either side by the fine-grained buildings characteristic of this part of the conservation area. Looking to the south from the Cross, the view terminates at No 1 Commercial Road where the road splits in two, encompassing a number of features along its way. The chimneys of St Mary De Crypt, the timber framed gables of Robert Raikes House and the characterful roofscape comprising a variety of gables, chimneys and roof slopes are of particular note.

Eastgate Street stretches beyond the boundary of the City Centre Conservation Area with the long, straight nature of the road enabling far-reaching views both through the Eastgate and St Michaels Conservation Area, to the Cotswold Hills beyond. Street trees are prominent in many of these views and make a positive contribution to them, bringing an element of green into this urban setting. The first-floor bridge which is part

of the Eastgate shopping centre interrupts a number of these views at high level and can cause overshadowing which is unfortunate.

3.1.2 STREETScape CHARACTER

Streetscape is the outward facing visual appearance and character of a street, area or locality.

Open Space

The semi pedestrianised nature of the Gate Streets and the Cross creates a freely accessible area within the centre of Gloucester, one that is used not only for enabling people to access the shops and services that line these streets, but also, to some extent as a destination in itself, with the presence of benches, and the use of the pedestrianised streets for outdoor dining, encouraging people to linger in these areas. Other than the Gate Streets themselves, there is limited public open space within this character area. The churchyard of St Mary de Crypt, which can be accessed from Southgate Street along Marylone, is a rare green space and provides a degree of tranquillity away from the busy shopping streets. The presence of a number of trees in this space contributes to this area's ambiance, however, recent incidents of anti-social behaviour detract from calm and respite that this place can offer.

Other open spaces within this character area include the area at the southern end of Southgate Street and the space to the west of Shire Hall. Whilst this latter area benefits from the presence of a number of street trees, it remains a location which could be improved and enhanced.

Whilst not always accessible to the public, green spaces can be found within Blackfriars. In addition to the south of the priory site, some retained front gardens front onto Ladybellegate Street and are visible from the public domain. Though limited in number these are a rare example of inner-city development which had a traditional front garden.

Within the character area is a limited amount of vegetation, sometimes within the form of street trees, whilst other are planters located on the street network. Although limited in number, and not always sensitively placed, this vegetation is part of the streetscape and adds a visual contrast to an otherwise high density of hard landscaping and terraced buildings.

Public Realm

The Gate Streets were the subject of a substantial pedestrianisation scheme which began in the 1990s and encompassed their intersection and extended as far as the junction with Brunswick Road (Eastgate Street), the junction with Blackfriars, (Southgate Street) Upper Quay Street (Westgate Street) and the junction with the Oxbode (Northgate Street). Much of the public realm within the Gate Streets today, dates back to this time.

In terms of street surfaces a variety of materials have been used within the Gate Streets including York Stone and Forest Pennant Stone slabs for pavements as well as small red clay setts in a herringbone pattern in the central areas of upper Westgate and Eastgate Street, or a higher quality stone setts (upper Southgate and Northgate Streets) which are more robust and allow for vehicle movements. In some areas coloured tarmac, or resin bound gravel have been used. A strip of clay or stone setts in stretcher bond are usually laid between the edges and middle sections of the streets.

Also of interest are the outlines of archaeologically known buildings laid out in black engineering bricks which are set into the paving at various points along Eastgate and Westgate Streets. Whilst these outlines are unusual, the information on them is both limited and dated, and somewhat lost in the myriad of street clutter that now dominates central Gloucester; something that leads to underappreciation of this distinctive feature.

As a part of the HSHAZ a scheme to improve the public realm within the Cathedral Quarter was introduced and having undertaken public consultation, a number of proposals, including decluttering the street, repairs to street surfaces, the introduction of more greenery and seating and improved interpretation have now been put forward. The implementation of these proposals is currently underway.

Evidence of the Via Sacra, a pedestrian scheme that originated in the Jellicoe Plan and linked the then new shopping centres with the historic elements of the city centre and the Cathedral, can be found in all the character areas including the Gate Streets. In some cases, traditional materials were used for the paving of the route, whereas in others a cruciform pattern is inlaid in the street surface. Unfortunately, whilst the route may provide a link between a number of Gloucester's historic sites, there is a lack of consistency in terms of how this route is depicted, as well as a lack of interpretation and maintenance, all factors that erode the legibility of this interesting route.

Whilst there are examples of the use of high quality and traditional materials within the Gate Streets, and interesting surface features, sporadic change, a lack of

maintenance and insensitive and poor quality repairs in the years since pedestrianisation have eroded and diminished the sense of cohesion that was originally intended.

This lack of cohesion is also reflected in the wide range of street furniture that is evident within this central area, which includes bins, bollards, seating and wayfinding. Again, whilst there may have initially been a uniformity of approach, in the intervening years, any co-ordination appears to have been lost, with an irregularity in the type and the placement of the public realm furniture, much of which is dated and poorly maintained. This, alongside the privately owned outside eating areas, food wagons and advertisements, give the Gate Streets a chaotic and often cluttered feel.

Within the Gate Streets is also a considerable amount of public art, from the mosaic panels which indicate the previous historic uses of the rear streets, to the sculptures seen at the Cross, the junction of Southgate Street and Commercial Road. The quality of these works varies, and their placement and lack of interpretation means that many of these items are not fully understood or appreciated; they add to the cluttered feel of these streets.

The introduction of a Public Realm Strategy in 2017 sets out a clear approach to the selection of materials, designs and the location of these throughout the City Centre Conservation Area to strengthen the relationship between primary, secondary and rear streets and is a welcome introduction. Whilst it may not be possible to undertake a comprehensive redevelopment of the public realm in this conservation area at present, as development opportunities arise, the public realm strategy should be used to guide development to ensure that high quality and appropriate materials are used. For further information please see [prs-adopted version.pdf](#) (gloucester.gov.uk)

3.1.3 ARCHITECTURAL CHARACTER

A substantial part of the special interest of the City Centre Conservation Area is derived from its buildings, which give the Gate Streets a rich texture and provide an illustration of the development of the city. Many of these buildings are 'listed' which means that they are included on the government's Statutory List of Buildings of Special Architectural or Historic Interest. Landmark Buildings, which may be listed or unlisted, make a particular contribution to the streetscene. There are also a number of unlisted 'positive buildings', whose contribution may be less than a landmark, but which still have considerable value ('Unlisted landmarks' and 'positive buildings' may be considered to be non-designated heritage assets, NDHA, and a number of these will be on Gloucester's Local List.) Unfortunately, though, there are also examples of less sympathetic and inappropriate development within the conservation area, with a number of buildings that are detrimental to, or have a negative impact on the

conservation area; these are referred to as negative buildings. Neutral buildings, make no contribution (neither positive or negative) to the area's special interest; they can however, in some cases, help to enable an appreciation of a heritage asset. (This will be discussed later in this appraisal, in relation to the recent Friars Orchard Scheme.) A map showing the buildings within the City Centre Conservation Area and identifying the contribution that they make can be found on page X, whilst access to the full range of listed buildings in Gloucester's City Centre Conservation Area can be found on: Search the List: Map Search | Historic England

Listed Buildings

These buildings are protected by law and consent is required from Gloucester City Council before any works of alteration, extension or demolition can be carried out. The City Centre Conservation Area contains 139 listed buildings, the highest proportion, 79, being found in or around Westgate Street, with 41 in or around Southgate Street. The rest of the conservation area accounts for just 19 entries. The high quality of these buildings means that within the conservation area are 23 grade I or II* listed buildings (or entries) including Blackfriars and Greyfriars which are listed grade I as well as being scheduled monuments. Some of the highest graded listed buildings within the Gate Streets include:

26 Westgate Street (Grade I) Dating back to the late 15th century, this refronted former merchants house is notable for the quality of its surviving historic fabric in particular its leaded glass. Its elaborate multi jettied façade can be viewed in Maverdine Lane

The Fleece, 19 Westgate Street (Grade I) 15th century timber frame pilgrims' inn with surviving 12th century undercroft. Its 19th century timber frame façade faces onto Westgate Street

5-11 College Street (Grade II*) 15th range of dwellings or shops and dwellings. Substantially altered in the 18th and 19th century and altered/restored in the 20th century.

The Dick Wittington, 100 Westgate Street (Grade I) Late 15th Century merchants house, with an 18th century frontage of high architectural quality.

Landmark buildings

Landmarks are buildings or structures that due to their height, location or detailed design stand out from their background. They contribute to the character and townscape of the area and provide navigation or focal points or key elements in views. Some of these buildings are important architecturally or historically, whereas others may be of community value, and they may be listed or unlisted.

Landmark buildings in the Gate Streets character area include:

Westgate Street

St Nicholas Church (Grade I) Historic church dating back to the 12th century which marks the north-western edge of the conservation area and now in the care of the Churches Conservation Trust

Bishop Hooper's House/The Folk of Gloucester, 99-101 Westgate Street (Grade II*) Mid 16th century traditional timber frame building retaining considerable original fabric

Shire Hall Complex (Grade II) Early 19th century magistrates court designed by Sir Robert Smirke with substantial additions in the early 20th century. A substantial and dominant building on the lower end of Westgate Street

58 Westgate Street and 2-8 College Street (Grade II) Late 19th century range of shops and offices by FW Waller. Its decorative details and prominent position ensure its contribution to the Westgate streetscene.

Eastgate Street

Lloyds Bank, 19 Eastgate Street (Grade II) Northern Renaissance style late 19th century building has a red brick and granite ashlar façade with terracotta details. It was designed by FW Waller.

Northgate Street

The New Inn (Grade I) Nationally important and substantially intact high quality timberframe 15th century galleried inn

St John the Baptist Church (Grade II*) Historic church dating back to the mid 15th century with many significant phases of alteration and change.

The former Debenhams store (unlisted) – Substantial high quality example of 1930s architecture with art deco decoration.

Southgate Street

St Michael's Tower (Grade II*) The tower of the former 15th century Church of St Michaels stands at the Cross, the highest point in Gloucester City. As well as acting as a focal point, St Michaels Tower provides key views across the City.

St Mary De Crypt (Grade I)) Historic church first recorded in the first half of the 12th century. It's attached church yard is an important green space within the City Centre Conservation Area as well as contributing to the setting of Greyfriars.

Blackfriars (Grade I, Scheduled) Founded around 1239, Blackfriars is one of the most complete surviving Dominican 'black' friaries in England (so called due to the colour of their robes). This group of buildings retains is of considerable importance, for its relative completeness and the survival of its scriptorium, one of the country's oldest surviving library buildings.

9 Southgate Street (Grade I) Mid 17th century building constructed for Thomas Yate, an alderman and apothecary of Gloucester and is of note for the outstanding architectural quality of its carved and panelled timber façade, which would have once been painted in an orange russet colour.

A map showing the City Centre Conservation Area's landmark buildings can be found on page X.

Positive buildings: Unlisted buildings of merit/NDHAs

There are a number of buildings within the City Centre Conservation Area that are not listed, and which do not perhaps have the prominence or presence to be identified as 'landmarks', but still make a positive contribution to the streetscape and its' richness. Positive buildings within the Gate Streets include:

25-27 Westgate Street, late 19th century shops and dwellings with stone dormers above

1-3 Northgate Street, early 20th century ashlar faced bank

32-34 Southgate Street, Victorian recreation of a 16th century timber frame building

71-73 Southgate Street, Gloucestershire Furniture Exhibition Centre, an early 20th century building by A.W. Probyn with a large first floor display window.

Neutral and negative buildings

Neutral buildings within the Gate Streets include 4-6 Southgate Street (neutral) and 11-25 Southgate Street (negative).

Historic shopfronts

As one of Gloucester's main retail centres, shopfronts make an important contribution to the character of the area, with shopfronts on the ground floor of many buildings within the Gate Streets. Unfortunately, though, whilst there may be many shopfronts, historic ones are relatively rare, with those that do survive, and which retain historic fabric, dating from the late 19th/early 20th century. With so few of these surviving, those that do are of considerable importance and should be conserved; partial areas of fabric should also be considered valuable and reinstating lost elements should be encouraged. It is also worth noting that further historic fabric may be hidden by large fascias or over-faced with contemporary materials, and that care should be taken when dealing with such sites.

The following historic shopfronts have been identified –

- 5 Southgate Street

- 28 Southgate Street

- 45-47 Southgate Street

- 76 Southgate Street

- 80 Southgate Street

- 82-84 Southgate Street

- 13 Westgate Street

- 19 Westgate Street

- 52 Westgate Street

- 64 Westgate Street

- 66 Westgate Street

- 100 Westgate Street

Architecture and materials

The diversity of buildings within the Gate Streets, in terms of their age, period of development, function and style inevitably leads to a wide range of architectural features, methods of construction and building materials. Perhaps the most diverse street, Westgate Street, includes timber frame buildings, some of which, for example The Folk and 66 Westgate Street are jettied, whilst others, for example the Dick Whittington Public House and 26 Westgate Street, have been historically refronted and now have facades of brick or render respectively. Other examples of timber framing can be found on Southgate Street, in the form of the Robert Raikes Public House, and on Northgate Street, with the New Inn, an historic medieval coaching inn. The building styles of the 18th and early 19th century are also represented within the Gate Streets. With facades of brick and render, these buildings often have pitched slate roofs, many of which sit behind parapets. These buildings include features such as sliding sash windows, pediments, keystones, string courses and cornices. Gloucester's Shire Hall however, the core of which was constructed in the early 19th century, is ashlar faced. The principal elevation of this substantial structure is dominated by a giant inverted Ionic portico, whilst the later wings are rusticated at ground floor levels and have rooftop balustrading.

Later 19th century buildings are also evident within the Gate Streets, with the domestic revival style 58 Westgate Street/2-8 College Street being a prominent example. With its gabled dormers, upper floor timber framing, decorative barge boards and mullioned windows, this striking building is identified as a landmark within the conservation area.

There are a number of ecclesiastical buildings within this character area, including the 13th century Blackfriars and the 12th century St Mary de Crypt. These iconic stone buildings contain such external features as tracery, buttresses, stone mullion windows with hood mouldings and stained glass and provide enrichment to this historic part of Gloucester.

Whilst the church buildings are generally earlier, the more recent past is also visible within the Gate Streets, with considerable 20th century development evident. Whilst some of these buildings, for example the former Debenhams Store which fronts onto Northgate Street, is undoubtedly a positive building with its dressed stone facades and art deco detailing, many of the others are less successful, for example 2-4 Northgate Street and 1-3 Eastgate. Often brutalist inspired, these bland heavy buildings, with their lack of details and extensive use of concrete, are out of place in this sensitive historic setting.

Boundary treatments

The densely packed nature of the built form on the Gate Streets, and the way many of the buildings face directly onto the street means visible boundary treatments in this character area are relatively limited. Some that can be seen from the public domain, and which make a positive contribution to the character of the conservation area include the railings and plinth that surround St Mary de Crypt. Blackfriars also retains a range of historic boundary treatments which includes walls of historic stone and brick, as well as the railings and plinth that front the Georgian terrace that are attached to this historic site.

3.1.4 CONDITION AND THREATS

Whilst the Gate Streets contain some of the most important elements within the conservation area, their condition, both in terms of the built environment and the public realm, gives cause for concern, with many buildings in a poor and deteriorating condition, a proliferation of inappropriate signage, as well as poorly maintained and outdated street surfaces and furniture. Whilst the current HSHAZ scheme has provided some funding to assist owners of buildings in Westgate Street to repair and restore their buildings, and to enable the conversion of upper floors to residential use, many

buildings remain within the Gate Streets that are in need of repair and maintenance. The number of vacant premises in this character area, especially at ground floor level, exacerbates this concern.

A summary of the strengths, weaknesses, opportunities and threats with regards to the Gate Streets, is provided below.

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
Historic Street Layout – Roman, Saxon, Medieval and later	Poor quality and unsympathetically over scaled late 20th century buildings	Ensure high quality new development that is sensitive to the historic city centre	Insensitive development within the character area or its setting.
Outstanding range of historic buildings, from the 12th -20th centuries	Excessive and sometimes poor-quality street furniture (some of which is defunct)	Strengthen pedestrian links between the Docks and the Cathedral	Increasing number of vacant premises – shops and upper floors
High number of historic ecclesiastical buildings	Lack of/poor quality highway maintenance	Reduce unauthorised and inappropriate advertising and fascia signage	Lack of maintenance (built environment)
	Buildings at Risk/ buildings in a poor state of repair	Increase awareness and protection of	Erosion of historic

	<p>Lack of interpretation of historic environment</p> <p>Lack of green infrastructure</p> <p>Poor quality advertising and signage</p> <p>Litter/cleanliness anti social behaviour</p> <p>High vacancy rates within properties of each of the Gate Streets leading to poor condition of properties.</p>	<p>non-designated heritage assets</p> <p>Improve public awareness of the city's history and its heritage assets through improved interpretation</p> <p>Promote/encourage the introduction of green infrastructure where appropriate</p> <p>To shift the city centre away from retail and to encourage alternative commercial and residential uses in historic properties</p> <p>To secure funding from relevant national bodies to invest in the fabric of historic properties</p> <p>To redevelop the Fleece Hotel</p>	<p>features/use of inappropriate materials</p> <p>Inappropriate and unauthorised signage</p> <p>Ongoing insufficient maintenance and renewal of the public realm</p> <p>Condition of streets (cleanliness) and anti social behaviour</p>
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3.2

Brunswick Road, Greyfriars and Eastgate

The 'Brunswick Road, Greyfriars and Eastgate' Character Area has undergone significant change since the turn of the 21st century. Once dominated by the Brunswick Road campus of the Gloucestershire College of Arts and Technology, the buildings on this site, including the 'positive' late 1930s purpose built technical college, as well as the college's less successful later elements have in the last decade been demolished and replaced with the 'Friars Orchard' scheme, a predominantly residential development.

Despite this level of development, this character area remains one for which further ambitious regeneration plans have been put forward with a scheme that involves the Eastgate Shopping Centre and Market Hall and well as Greyfriars itself. When it proceeds it is proposed that it will provide Gloucester with a new cultural centre, one

which will provide the city with entertainment and performance space, hospitality options and an urban park.

Today though, the Brunswick Road Character Area is one of contrasts; it is a mix of old and new and encompasses evidence of built form from the earliest times, for example the remains of the footings of the Roman 'East Gate' on the corner of Brunswick Road and Eastgate Street, up until the more recent 21st century residential Friars Orchard development. In between are medieval remains, in the form of Greyfriars Church, as well as buildings from the 18th and 19th centuries. In addition, whilst there are areas of activity and energy for example, the modern shopping centre, a large proportion of this character is a place of relative tranquillity, which although used as a thoroughfare, feels far away from the hustle and bustle of Gloucester's retail centre. The green spaces within this character area, which can feel unexpected and even at times secluded, contribute to this feeling of calm.

3.2.1 TOWNSCAPE CHARACTER

Layout and plan form

There are a number of factors contributing to the layout of this character area. Much of the land is now defined by the Friars Orchard development, completed in 21st century, but there are other areas where parts of the historic development of this site are still evident. The streets around Priory Place and the Quakers Meeting House shows the remains of early 19th century development, whilst Greyfriars and its associated spaces give an indication of the layout of the area at an earlier time. Mid to late 20th century development, in the form of the Eastgate Shopping Centre, has its origins in the 'Jellicoe Plan', a comprehensive, but now much criticised scheme, which informed major development in central Gloucester in the 1960s and 1970s.

Land uses

The predominant land uses in this character area are residential and retail, however there are also other elements including community uses (Museum of Gloucester and the Public Library), and religious (Quakers Meeting House). In addition, commercial units have been made available on the ground floors of some of the Friars Orchard blocks; this option appears to have had only limited uptake, something that subdues the atmosphere in this area.

Building density, scale and proportions:

Whilst the Eastgate Shopping Centre is a substantial, intensely developed site, this intensity and size is not reflected in the pattern of development of the rest of the character area. There may be small areas of relative density, for example in the terraces in this character area (both historic and modern), however space remains between the small clusters of buildings such as between Priory Place and Greyfriars House and Church, and between the elements of the new development, for example between the Friars Orchards blocks and terraces. In addition, whilst a substantial number of new dwellings were created as a result of the recent scheme, the feeling within this character area is not one of over intensification, surprisingly an impression of space remains.

The scale and proportion of the buildings within this character area also varies, and whilst the design and substantial massing of the Eastgate Shopping Centre may detract from this part of the conservation area and have a detrimental impact on the setting of the listed buildings in this locality, recent development has been more considered. With its sensitive scale and use of materials, its pared down design, modest storey height and careful spacing, Friars Orchard enables an appreciation of the historic environment in which it was placed; the removal of cars from much of this area, though 'under garden' parking, contributes to the success of this scheme.

Whilst a few of the historic buildings in this character area have a modest plot, others for example the Public Library, Museum of Gloucester and Winston Hall, have a larger footprint and are of a more generous size. These buildings are predominantly 2-3 storeys, but the increased height of the storeys, their proportions, and in some case their embellishments, gives them a stature and presence, which adds considerably to the character of the conservation area.

Alleyways and backstreets

The historic back street Greyfriars, can be found in this character area. Views There are panoramic views from the top of the Eastgate shopping centre carpark however, because of the developed nature and topography of this part of the conservation area, the remaining views are shorter and more local though still of considerable importance. These include the historic view (looking west) from Brunswick Road along Greyfriars, and a newly created one, along Friars Orchard, again from Brunswick Road looking west. There are also a number of enclosed and terminated views in the open space immediately to the south of Greyfriars House and Church. Partially enclosed by historic buildings, and recently landscaped, this space, and the views within it, contribute to the character and appearance of this part of the conservation area. There are also views from the west of Greyfriars House, to the rear of St Mary de Crypt.

3.2.2 STREETScape CHARACTER

Open space

There are a number of open spaces in this character area, including ones that have either been created or enhanced by the recent Friars Orchard development, for example the area facing on to Brunswick Road. Others such as the 'Bowling Green', to the rear of the public library, and the Greyfriars burial ground are more historic. The green nature of these spaces, and the trees throughout this character area, (including a number that have recently been planted) bring a contrast and a freshness, to this city centre location.

Public realm

The public realm in this character area is dominated by the Friars Orchard scheme, which introduced new street surfaces, street furniture/street art and planting. However, whilst this scheme is beginning to settle in, and whilst much of this area appears well cared for, regular maintenance will be needed to ensure that it remains in its current condition. In addition, interpretation for the street art within this area also needs consideration, as at present it lacks context and meaning.

Some historic surface treatments remain within this character area, in particular to the front of Greyfriars House, whilst the route of the Via Sacra is clearly evident in this character area, with its cruciform pattern inset into the footpath along Greyfriars.

Street art is limited, confined to the 'wall' along Brunswick Road and the 'coffin' benches next to Greyfriars. Unfortunately, no interpretation is provided to support these artworks, and they appear lost and without meaning.

3.2.3 ARCHITECTURAL CHARACTER

The architectural character of this part of the conservation area is varied, with many neutral buildings and a substantial negative building. Scattered amongst this are a number of listed buildings. These buildings are of importance in their own right, but they also contribute to an understanding of Gloucester's history and provide a visual enhancement within the street scene.

Listed Buildings

The Listed Buildings within the Brunswick Road, Greyfriars and Eastgate Character Area include:

Winston House (Grade II*) Substantial brick built mid-18th century house with intact boundary treatments.

Museum of Gloucester, Brunswick Road (Grade II) Late 19th century building (originally a lecture hall) by FS Waller, adjacent to the

Public Library, Brunswick Road (Grade II) Originally designed by Fulljames, Waller and Son to a 13th Century Gothic design, and extended around 1900.

Addison's Folly (Grade II) The surviving portion of a former house on the south side of the former Bell Lane, which includes masonry that is probably medieval and from demolished parts of Greyfriars.

Landmark buildings

Greyfriars House and Church (Grade I) Early 19th century classically style town house and the adjoining remains of the nave and north aisle of the church of the former Franciscan Friary. Also a scheduled monument.

Re-sited (Grade II) market hall entrance built to designs by Medland and Mowbray in 1865 Positive buildings:

Unlisted buildings of merit/NDHAs There are no unlisted buildings of merit in the Brunswick Road and Greyfriars Character Area.

Neutral and Negative Buildings

There are a number of neutral buildings in this character area, in particular those that make up the Friars Orchard development. However, whilst these buildings may be termed as neutral, their neutrality enables an appreciation of the historic environment in which they are located. The Eastgate Shopping Centre is a negative building.

Historic shopfronts

There are no historic shopfronts in this character area.

Architecture and materials

Although the number of historic buildings in this character area may be limited, a number of styles, features and materials are still represented. The cluster of historic buildings around Greyfriars (with the exception of the church itself) date back to the early to mid 19th century and contain features consistent with that period including sliding sash windows, fan lights, cornice and parapets, and to Greyfriars House, a portico and pediment. These buildings are constructed of brick, brick and stucco or stone, whilst roofing materials are predominantly slate.

The later 19th century is represented on Brunswick Road in the form of the public library and museum. Built in a Victorian 13th century Gothic style, the public library is an ornate building with a range of decorative features including its red tile roof laid interspersed with decorative courses and patterns, its squared rockfaced coursed rubble stonework, its arched canopies and its foliated capitals. In contrast is the City Museum and Art Gallery. Another Victorian interpretation of an earlier period, this time an eclectic early Renaissance style, the building includes within it features such as copper cupolas, an ashlar fronted dormer and an entrance with a shell hood with scalloped edges.

Winston House, located on Bell Lane, however is much earlier (mid 18th century), and its multi-pane sash windows, with exposed sash boxes reflect this. It also has a Palladian (Venetian) window. The front elevation contains an Ionic stone door surround, whilst facades are brick with stone detailing.

Although now a ruin, the remains of Greyfriars retain a number of architectural features. Though now predominantly blocked in, the arched openings between the nave and the north aisle are still clearly visible, as are elements of some of the building's tracery. In addition, though much of this historic site has been lost, it remains a haunting and evocative place, one that defines the character of this part of the conservation area.

The modern buildings in this area are predominantly brick, though the late 20th century Eastgate Market Hall has ribbed granite aggregate panels which alternate with angled steel mullioned windows; to top it are concrete rainwater chutes, in a style reminiscent of the modernist architect Le Corbusier. Opinions of this striking building are mixed.

Boundary treatments

The street facing nature of the Friars Orchard blocks, and the back-to-back character of the terraces, limits the extent of the boundary treatments in the development. Where they do exist, they are in keeping with the development and include red brick walls, close boarded fencing, and, on the Brunswick Road part of the scheme, railings in red brick plinths. Red brick can be found in other parts of the character area, including alongside the bowling green, to the rear gardens on Priory Place. Unfortunately, the modern boundary treatments to the front of this terrace lack a sense of continuity, as whilst brick, they differ in colour.

Whilst the elevations of Winston House are brick, the boundary treatment is not, with ironwork railings set into dressed stone plinths enclosing the front of the property. Whilst this boundary treatment reflects the historic high status of this building, it is now somewhat overwhelmed by the massing and unsympathetic design of the Eastgate shopping centre, to which it is adjacent.

3.2.4 CONDITION AND THREATS

Overall, the condition of this character area is good. Whilst some of the historic buildings in this part of conservation area would benefit from improved maintenance, the introduction of the Friars Orchard scheme, and the public realm improvements made as a part of this, have brought about positive change.

Brunswick Road, Greyfriars and Eastgate.

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>Range of historic including the outstanding Greyfriars</p> <p>Important below ground remains</p> <p>A level of green space</p>	<p>Poor quality and unsympathetically over scaled late 20th century buildings</p> <p>Buildings at Risk/ buildings in a poor state of repair</p> <p>Lack of interpretation of historic environment</p> <p>Litter/cleanliness anti social behaviour</p> <p>Area to the rear of Eastgate Shopping Centre is neglected and overlooked.</p>	<p>Ensure high quality new development that is sensitive to this historic context</p> <p>Improve public awareness of the city's history and its heritage assets through improved interpretation</p> <p>Levelling Up Funding to regenerate the Greyfriars/Eastgate area, which should drive more footfall to a currently overlooked area.</p>	<p>Insensitive development within the character area or its setting.</p> <p>Lack of maintenance (built environment)</p> <p>Erosion of historic features/use of inappropriate materials</p> <p>Lack of maintenance of Friars Orchard planting scheme</p> <p>Condition of streets (cleanliness) and anti social behaviour</p> <p>Commercial units on the ground floor of Friars Orchard remain empty.</p>

3.3 Quay Street, Longsmith Street and Ladybellegate Street

The Quay Street, Longsmith Street and Ladybellegate Street Character Area focuses on a collection of historic streets immediately to the south of Westgate Street. Whilst not perhaps one of central Gloucester's primary routes, Longsmith Street, which descends through Bearland and Quay Street towards the River Severn, and its off shoots provide evidence of the layout of historic Gloucester dating back to the medieval period. Longsmith Street runs parallel to Westgate Street to which it connects through a number of side streets and alleyways.

Within this streetscape are a number of impressive and significant historic buildings, for example the grade I listed Ladybellegate House, a substantial early 18th century townhouse, and Gloucester's Crown Court, constructed in the early 1800s as the assize, quarter session and county court. Whilst the style of this latter building may be severe classical and restrained, the use of high quality ashlar in its construction gives an indication of the status of this important building. Ladybellegate House, and the row of late 18th century townhouses which line part of Berkeley Street, provide evidence of residential development at that time. Further evidence of 18th century development can be found on the southern side of Longsmith Street, in the form of Bearland House and Bearland Lodge. Whilst these attractive buildings are not currently within the City Centre Conservation Area, they make a positive contribution to its setting.

Unfortunately, the Longsmith Street locality also contains some of Gloucester's less successful examples of modern development, with the 1960s multistorey carpark and the early 1970s extension to the telephone exchange, overshadowing and detracting from the historic buildings within this area. In addition, whilst attempts have been made to improve the appearance of some of these buildings, for example by recladding the immense 1960s extension to Shire Hall, these structures remain a negative feature within this character area.

The street level car park, which runs along the eastern side of Ladybellegate Street, whilst it creates a feeling of openness, does little to enhance the character of the area. It is also considered to be detrimental to the setting of Blackfriars Priory. The continuous flow of road traffic in this area, something that is encouraged by the availability of car parking, is also a negative feature, though the recent development of the car parking site to the west of Ladybellegate Street to provide student accommodation, has provided a more structured setting to the conservation area.

3.3.1 TOWNSCAPE CHARACTER

Layout and plan form

The layout of this character area is defined by the historic development of Gloucester, in particular the layout of the medieval city, which includes a number of alleyways and side streets. However, whilst the street layout may remain relatively unaltered the buildings and spaces that line these streets have undergone substantial change over the centuries, and relatively few historic structures remain above ground today; much of this area is taken up by immense later 20th century buildings such as the extension to Shire Hall, which bridges Bearlands and cuts this character area in two. There is no sense of continuity or connection between the majority of the buildings in this character area and little evidence of a common building line; the grain of development, in contrast to the adjacent Westgate Street, is less constrained.

Land uses

Once the home to Gloucester's important iron smith industry, the land uses along Longsmith Street, Ladybellegate Street and Quay Street are today varied. Whilst car parking accounts for some of the land use, civic and administrative services are also represented. There is also a limited amount of residential accommodation in this character area, but no retail.

Building density, scale and proportions

There is a marked contrast in the scale and proportions of the historic buildings and the buildings of the late 20th century within this character area. Whilst the historic buildings, for example, Ladybellegate House, Gloucester Court and the 18th century houses along Berkeley Street may have been buildings of status, stature and size at the time of their construction, today they appear modest and are overshadowed by the vast modern structures next to which they are located. The historic buildings are generally between two and three storeys in height, and up to seven bays wide.

The late 20th century structures, in particular the early 1970s extension to the telephone exchange and the 1960s addition to Shire Hall are immense, with extensive footprints, many storeys and tall storey heights. The proportions of these colossal buildings, their massing and form, give an impression of density to this character area, although there is space between many of the buildings within this part of the city.

Alleyways and backstreets

This character area contains a number of alleyways and backstreets, some of which are medieval in origin and which link to Westgate Street.

These include:

- Bull Lane

- Cross Keys Lane

- Berkeley Street

Views

Whilst the Shire Hall 'bridge' blocks views down Longsmith Street towards Bearland, there remain a number of significant views within this character area. Some of these can be found from the top on the Longsmith Street Car Park, which enable a range of far reaching views across the centre of Gloucester including ones towards the Docks, towards the Cathedral and others that provide an unusual, but interesting picture of the backs of many of Gloucester's historic buildings.

At ground floor level views are more limited in their scope, though still attractive and appealing. They include the view looking north along Ladybellegate Street which terminates at Ladybellegate House and enclosed views into Bull Lane and Cross Keys Lane. Berkeley Street has views of particular importance, including towards the south which terminates at Bearland House, whilst the other looking north, which provides glimpses of Gloucester Cathedral.

3.3.2 STREETScape CHARACTER

Open space

The prevalence of street level parking on and around Longsmith Street, and the road layout around Quay Street, give a feeling of openness in this city centre area. However, whilst this may be the case, these car parks, some of which are poorly maintained and have irregular boundary treatments, make little aesthetic contribution to the conservation area and detract from its historic character. Rather than providing a sensitive setting for the heritage assets in this character area, these

spaces identify it as a place of transition, for people to leave their cars and go. They do little to encourage appreciation of one of Gloucester's more historic areas.

Public open spaces, for example, the areas around the entrances to Berkeley Street and Bull Lane, whilst small, are more positive. With their established street trees, and the provision of seating around Berkeley Street, these small spaces encourage people to linger; they also enhance the setting of the nearby listed buildings within this historic area.

The gardens to the front of Ladybellegate House and Bearland House, whilst modest and not within the public domain also make a positive contribution to this character area. Their boundary treatments, in the form of traditional ironwork railings, not only contribute to the historic interest of this area, they also enable views of these important buildings.

Public realm

Surfaces, Street Furniture and Street Art.

Whilst there is evidence of traditional street surfaces on Berkeley Street modern surfacing treatments are more prevalent within this character area, with tarmac being used on both pavements and roads, and substantial areas using modern paving slabs. Unfortunately, there is also evidence of a lack of maintenance, and poor repairs. The Via Sacra runs through this character area. Other than bollards, parking meters and signboards, street furniture is limited in this area, with only a scattering of benches around the entrance to Berkeley Street. There is also no street art. The lack of enhancement to this area, further reinforces the transitory nature of this area.

3.3.3 ARCHITECTURAL CHARACTER

Listed Buildings

The Listed Buildings within the Quay Street, Longsmith Street and Ladybellegate Street Character Area include:

Ladybellegate House, 20 Longsmith Street (Grade I) Early 18th century townhouse constructed in 1704 for by Henry Wagstaffe

Cider House, 2 Quay Street (Grade II) Utilitarian building with a complex history and various uses including a coach house, warehouse and a slaughterhouse.

20 Berkeley Street (Grade II) Late 18th century townhouse constructed of brick with stone and rendered details.

Landmark buildings

There are no Landmark Buildings within this character area.

Positive buildings- Unlisted buildings of merit/NDHAs

The Telephone Exchange, Berkeley Street, Neo -Georgian late 1930s building constructed of brick with an ashlar ground floor.

Neutral and Negative Buildings

Negative buildings in this character area include Longsmith Street carpark, the extension to the Telephone Exchange and the extension to Shire Hall.

Historic shopfronts There are no historic shopfronts in this character area.

Architecture and materials

The majority of the historic buildings within this character area are 18th and 19th century, and as such show various details associated with the Georgian/Regency period for example multi pane sliding sash windows, pedimented door surrounds, fanlights and parapeted roofs. Buildings are predominantly brick, sometimes with stucco detailing, though there are examples of render and ashlar, with slate and tiles being used on the roofs.

The late 20th century developments within this character area, in particular the extension to the telephone exchange, contain a number of traits consistent with Brutalist architecture, for example the extensive use of concrete, massive forms and heavy looking materials. Attempts have been made in recent years to improve the appearance of some of these structures, for example by recladding the Shire Hall

extension and introducing new fenestration, however these alterations do little to ameliorate the negative impact of this massive structure. Materials used in these modern buildings include brick, concrete, decorative cladding and aluminium windows.

Boundary treatments

Unfortunately, many of the boundary treatments in this part of the conservation area make little positive contribution to the character and appearance of this historic space. The boundaries to the ground level car parks on Ladybellegate Street, which are enclosed by a combination of modern and older brick walls, are in need of maintenance and repair, whilst the use of modern timber fencing, to the southern end of the carpark appears an incongruous insertion. The masonry walls to the rear of the Longsmith Street car park, also need maintenance works. In contrast to these are the boundary treatments to Ladybellegate House and Bearland House, **the latter of which has now been brought into this conservation area;** the retained historic railings set in stone that front both these houses, are attractive elements that enhance this location.

3.3.4 CONDITION AND THREATS

There are concerns with the condition of this character area, in terms of its built form, its public realm and its open spaces. Whilst the multi storey and street level car parks may be viewed as regeneration opportunities, they are currently in a poor condition, a factor which detracts from the conservation area. Street surfaces also require appropriate maintenance and repair, as do some of the historic buildings within this area. There is considerable scope for improvement.

Quay Street, Longsmith Street and Ladybellegate Street

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>Historic Street layout – Medieval and later</p> <p>Range of high quality historic buildings</p> <p>Important below ground remains</p>	<p>Poor quality and unsympathetically over scaled late 20th century buildings</p> <p>Lack of/poor quality highway maintenance</p> <p>Buildings at Risk/ buildings in a poor state of repair</p>	<p>Ensure high quality new development that is sensitive to the historic city centre</p> <p>Redevelopment of Longsmith Street car park and car parks along Ladybellegate Street.</p>	<p>Insensitive development within the character area or its setting.</p> <p>Ongoing insufficient maintenance of the built environment</p>

	<p>Appearance and maintenance of street level car parks (Ladybellegate Street)</p> <p>Lack of maintenance of/poor quality/unsympathetic boundary treatments</p> <p>Unattractiveness of Multi-storey car park</p> <p>Litter/cleanliness anti social behaviour</p>	<p>Increase awareness and protection of non-designated heritage assets.</p> <p>Strengthen pedestrian links between the Docks and the Cathedral.</p> <p>Promote/encourage the introduction of green infrastructure where appropriate</p> <p>Location – proximity to Southgate Street</p>	<p>Ongoing Insufficient maintenance and renewal of the public realm</p> <p>Condition of streets (cleanliness) and anti social behaviour</p>
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3.4 King's Square and King's Walk

Historically the site of much earlier development, today the King's Square and King's Walk Character Area is characterised by a large open public space and the architecture of the 20th century. Whilst the majority of the early 20th century buildings in this area are well designed and use high quality materials, later change has been less successful. For example the contrast between the Post Office, which has been extant since 1934 and has classical detailing and a Portland stone façade and the 1970s King's Walk Shopping Centre, a substantial structure which lacks architectural merit and high quality materials is marked; the latter building makes a negative contribution to the character of the conservation area.

Despite its weaknesses, within King's Walk is access to a significant part of Gloucester's past, with the entrance to the 'King's Walk Bastion', part of the Roman city wall, being located in the shopping centre. Whilst a modest access point within a large retail centre, it is an indication of the extensive Roman remains that continue to exist beneath Gloucester's city centre.

Whilst it is the rear, weaker and rather bland elevation of the former Debenhams that overlooks King's Square, the immense size and overwhelming presence of this building make it one of the defining features of this part of the conservation area. Works are currently ongoing on this site, with enhancements to this substantial building proposed.

The exception to this 20th century domination is the northern side of St Aldate's Street, where a row of 19th century buildings remains; these buildings follow the line of part of Gloucester's Roman wall, and part of the route of the Via Sacra.

The King's Square and King's Walk Character Area and its setting are also areas where considerable change has happened in recent years and is currently ongoing. Under the heading of the King's Quarter, projects have included the renovation of King's Square (complete) and the repurposing of the former Debenhams site (ongoing). On the edge of the conservation area, the Forum, a scheme which includes substantial residential development, as well as a new four-star hotel, is progressing. A number of 'incubators', aimed at promoting growth in specific areas, have also been located within the King's Quarter. The new developments, as well as the focus on promoting growth, will help to ensure a positive future for the centre of Gloucester.

3.4.1 TOWNSCAPE CHARACTER

Layout and Plan Form

The layout of the space within the King's Square Character Area is predominantly defined by early 20th century development, in particular the creation of King's Square and The Oxbode which were constructed in the late 1920s, following the slum clearances in that area, as well as the construction of Bon Marche (the former Debenhams store). Although there have been additional changes to the area since that time, which involved further clearances and the pedestrianisation of the Square, the legibility of the early 20th century scheme remains.

The open nature of King's Square, and the generous width of The Oxbode, give much of this character area a feeling of space, despite its urban city centre position. This contrasts with St Aldates, which retains a more enclosed feeling, something that has been enabled by the retention of its 19th century buildings along its northern side.

Land Uses

With the impending arrival of the University of Gloucester and the public library on the former Debenhams site, educational provision and community use will become a major land use in this area. It will sit alongside the many retail premises that exist on the ground floors of both the Oxbode and St Aldates Street, and within the King's Walk Shopping Centre. Unfortunately, though, at present there are vacant premises, both at ground floor level and on the upper floor levels in these locations, something that subdues the vibrancy of this potentially thriving locality. Hospitality, in the form of the

converted former 'Regal' cinema (now a public house) as well as a number of cafes, are also evident.

However, the focal point of this character area is King's Square itself, a public open space that has recently been the subject of an extensive regeneration scheme. With a design based on the Severn Bore, the Square now includes granite wave shaped seating areas, water fountains and coloured lights. It is now Gloucester's premier outdoor events area.

Building Density, Scale and Proportions

In contrast to the open spaces within this character area is the density of the buildings. Along the Oxbode and St Aldate's are tightly grained street elevations, and a consistent building line, whilst the King's Walk Shopping Centre contains many units in one substantial mass. Together these provide a sense of enclosure around the open space, something that is helped by the height of the buildings some of which are up to 5 storeys, for example the former Debenhams, and have increased storey heights.

Alleyways and Backstreets There are no historic backstreets or alleyways in this character area.

Views

Many of the views within this character are local or linear. They include those facing east and west along the Oxbode, and also along St Aldates. In the latter case, because of the narrowness of St Aldates, and the height of the buildings on either side, these views feel more enclosed; the backdrop of the Cathedral, which is clearly visible when looking west along St Aldates, reminds the observer of one of Gloucester's most important historic sites.

The recent regeneration of King's Square has enabled local views across this space, which are terminated by the buildings that enclose it. Those which terminated by the early 20th century development, are of higher value than those that end on the later, 1960s – 1970s scheme. There are panoramic views from the top of the King's Walk Car Park.

3.4.2 STREETScape CHARACTER

Open Space

King's Square is the largest public open space, not just in this character area, but in the City Centre Conservation Area as a whole. Created in the late 1920s, it was not until 1972 that King's Square became a public open space. Fifty years later, in 2022, following its regeneration the Square was reopened. Now used to host weekly markets, live music and dance, family days, outdoor cinema and cultural activities, King's Square is promoted as Gloucester's major open air event space, and a destination in itself. The granite 'waves' which loosely enclose the square serve a number of functions, and can be used as seating, a stage set for plays or even for children to climb on; they encourage passers-by to stop and appreciate the space.

Adding to the character of King's Square are a number of mature street trees, as well as planting that has been added as part of the regeneration scheme, though this has yet to establish. Three more mature trees can be found at the western end of the Oxbode, providing an element of green in this built-up area.

There is enclosed space at the rear of the Oxbode, and within the former Debenhams site along St Aldates, which serve as service areas to those buildings.

Public Realm

The resurfacing of much of King's Square was part of the recent regeneration scheme with Forest of Dean sandstone used in the form of pavers and setts; high quality traditional materials that enhance this important location. Changes to the Via Sacra, were also made, with the removal of the cruciform pattern from the Square and its replacement with inset medal roundels. Whilst it is intended that these roundels will be used in the future to support the Via Sacra route, it should be noted that at present the cruciform pattern remains along St Aldate Street and in the King's Walk Shopping Centre as well as in other parts of the conservation area.

Surface treatments in other parts of this character area are more mixed, and whilst Forest of Dean sandstone is found on the Oxbode, some pavements, as well as the roads, have black tarmac surfaces. St Aldate also has concrete pavers. The use of the less traditional materials, as well as a lack of maintenance and poor-quality repairs beyond the Square itself, are all detrimental to the conservation area.

3.4.3 ARCHITECTURAL CHARACTER

Listed Buildings

There are no listed buildings in the King's Square character area.

Landmark Buildings:

The former Debenhams store (unlisted) – Substantial high quality example of 1930s architecture with Art Deco decoration.

Positive buildings- Unlisted buildings of merit/NDHAs

The Oxbode - Art Deco terrace above shops

The Post Office, 14 King's Square – Gloucester's first purpose-built head post office, with as striking classical ashlar façade.

The Regal, 33 St Aldate Street - Former cinema dating back to the 1930s and constructed in an Art Deco style. Now a public house.

60 Northgate Street and 1 – 23 St Aldate Street – terrace of 19th century buildings some of which contain historic shop fronts and others with upper storey shop windows.

Nem House, 37-41 Clarence Street, substantial 20th century building with stone faced lower floors, brick upper floors and sliding sash windows.

Neutral and Negative Buildings:

Negative buildings within this character area include 23a St Aldate Street and the King's Walk Shopping Centre.

Historic Shopfronts

The following historic shopfronts have been identified –

13 - 23 St Aldate Street

Architecture and Materials

The simple clean lines, geometric shapes and 'streamlined' look of the Art Deco movement are well represented in this character area, with the Oxbode, the Regal and former Debenhams store all examples of this style. Not only are these buildings well designed and executed, their use of high-quality materials, in particular their dressed stone facade, give them a status and stature above many of the other buildings in this character area.

Another high-quality building, of a similar date but of a different design is the Post Office. Again faced in stone, this building is more classical in its detailing and includes such features as cornices, key stones, pediments and a rusticated ground floor. It is an attractive and visually appealing building.

The quality of the rest of the 20th century architecture within this character area is less exalted, with, sadly, examples of uninspired design and overlarge structures and unsympathetic features. Materials are varied and include brick, concrete and large glazed features. The 19th century terrace that runs along St Aldates is predominantly brick at upper floor level, with some stone detailing. It contains within it an oriel window, a cupola, ghost signage and upper shop floor windows. This terrace makes a positive contribution to the conservation area.

Boundary Treatments

The street facing nature of the buildings within this character means there are limited boundary treatments that are visible.

3.4.4 CONDITION AND THREATS

Where there has recently been substantial investment within King's Square, and there continues to be with the regeneration of the former Debenhams site, there remain areas where there are weaknesses and threats within this character area. The lack of maintenance of the public realm and the poor-quality repairs beyond King's Square itself, are disappointing and detract from recently undertaken works to this public space, whilst the number of vacant premises in this area, and lack of maintenance to some buildings, diminish what should be a vibrant and thriving area.

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>High quality early 20th century architecture.</p> <p>Important below ground remains</p> <p>Pedestrian access point to the city centre from the Transport Interchange</p>	<p>Poor quality and unsympathetically over scaled late 20th century buildings</p> <p>Lack of/poor quality highway maintenance in places (the notable exception being King's Square)</p> <p>Buildings at Risk/ buildings in a poor state of repair</p> <p>Unoccupied properties (in particular the upper floors of the Oxbode)</p>	<p>Ensure high quality new development that is sensitive to this historic context</p> <p>Reduce unauthorised and inappropriate advertising and fascia signage</p> <p>Increase awareness and protection of non-designated heritage assets</p> <p>Improve public awareness of the city's history and its heritage assets through improved interpretation</p> <p>Promote/extend the green infrastructure where appropriate</p> <p>To build on the impetus of the current regeneration and attract further investment to currently neglected buildings.</p> <p>Regeneration of the Oxbode</p>	<p>Insensitive development within the character area or its setting.</p> <p>Increasing number of vacant premises – shops and upper floors</p> <p>Lack of maintenance (built environment)</p> <p>Erosion of historic features/use of inappropriate materials</p> <p>Inappropriate and unauthorised signage</p> <p>Ongoing insufficient maintenance and renewal of the public realm</p>

Management Plan:

The following set of management proposals are put forward as guidance for the Council in determining planning and listed building consent applications as well as for building owners, tenants, and developers when preparing proposals for change within the City Centre Conservation Area or its setting. These management proposals vary, with the some identifying the successful criteria for change, whilst others identify actions that can enhance this historic area, and which will be encouraged.

A level of consultation was undertaken at the start of the appraisal process in 2021, prior to the formulation of these management proposals; a further full public consultation was held in the autumn of 2023 for the conservation area appraisal document, of which the management proposals are a part.

The principal aim of the following proposals is the preservation or enhancement of the character and appearance of the City Centre Conservation Area, which will be brought about through the sensitive conservation of its historic elements, combined with positive change and regeneration where required. In recognition of the current climate change agenda, there is a presumption against demolition, except where buildings have been identified as having a negative impact on the Conservation Area and the viability of regeneration has been ruled out.

Proposals:

4.1.1 Development Proposals:

Aim: Development proposals will preserve or enhance the City Centre Conservation Area's character and appearance and conform to local policies as outlined in section D1 of the Gloucester City Plan. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area.

Management Proposal 1: Development will respect the scale, design, proportions, grain, and materials of the surrounding architectural vernacular. Detailing should be characteristic of the area and retain any historic plot boundaries/ historic street layout. Development will be of a high-quality design which reflects its immediate context and sits comfortably with its setting and **within** important views.

New development will normally be limited to a height that does not noticeably or significantly exceed that of the surrounding built form. An exception is only likely to be acceptable where it has some justification based on the character of the area, and sits comfortably with the pattern of existing historic tall buildings.

4.1.2 Demolition of Buildings

Aim: To ensure the significance of the Conservation Area is preserved and that any future development enhances its existing positive characteristics.

Management Proposal 2: The full or substantial demolition of buildings or structures identified as making a positive contribution to the significance of the Conservation Area (including NDHAs) is harmful to the significance of Conservation Areas and will

be regarded as substantial harm or less than substantial harm according to the circumstances of the case.

Demolition of neutral buildings will only be considered when there is no alternative use of the building, and when they are to be replaced with a quality building that has been specifically designed to preserve and enhance the character of the conservation area.

Demolition is only likely to be permitted for buildings identified as 'negative' within this conservation area appraisal, and will only be supported where there are acceptable plans for the site following demolition.

Proposals which look to adapt existing buildings in some form and support the climate change agenda will be positively received.

4.1.3 Boundary Treatments

Aim: Development proposals will preserve historic boundaries; new boundary treatments will be harmonious with surviving historic examples.

Management Proposal 3: The removal of historic boundary treatments will be resisted where there is no justifiable reason for their removal. Where new or replacement boundary treatments are required, they should use a local and traditional material palette and be of appropriate scale and design.

4.1.4 Inappropriate Alteration and the Loss of Original Features

Aim: To preserve, repair, restore or reinstate buildings historic features which make a positive contribution to the character and appearance of the conservation area

Management Proposal 4: The loss of architectural features that make a positive contribution to the character and appearance of the conservation area, such as the removal of existing chimneys or loss of traditional windows and doors will not be supported. In addition, when undertaking repairs to traditional buildings, appropriate traditional materials and fixtures and fittings should be used, for example lime mortars and renders and cast-iron rainwater goods. The use of non-traditional materials/fixtures and fittings, for example cement-based mortars and renders, uPVC windows, and plastic rainwater goods, will not be supported.

The painting or rendering of unpainted brick or stonework will not be supported.

PV and thermal panels, satellite dishes, TV aerials, meter boxes and other modern additions will not be resisted, as long as they do not impact negatively on the character and appearance of the Conservation Area. Locating them on the rear elevations or rear roof slopes may be an option.

4.1.5 Shopfronts

Aims: To conserve, repair or reinstate traditional shopfronts and, where new shopfronts or signage is required, ensure that it is well designed and appropriate to the host building and the context of the conservation area.

Management Proposal 5: The loss of historic shopfronts or historic features* will be resisted. Proposals for new shopfronts or signage must be in line with the requirements set out within the adopted Gloucester City Council guidance on shopfronts, shutters and signage or GCC Local Plan.

*Historic features can include such features as pilasters, capitals, cornices etc. For further information see [Shopfront Shutters and Signage Design Guide cover \(gloucester.gov.uk\)](http://gloucester.gov.uk)

4.1.6 Public Realm

Aims: To conserve existing historic and high quality aspects of the public realm. To improve the appearance and quality of the public realm

Management Proposal 6: The loss of historic elements of the public realm will not be supported. Where alterations to the public realm, or the addition of new elements/replacement items are required, they should respect the traditional materials and character of the Conservation Area and/or comply with the recommendations within the Gloucester Public Realm Strategy (GPRS).

Temporary repairs to hard landscaping which are not in keeping with original materials should be replaced on a like-for-like basis within 12 months of their installation.

Major new developments which require changes to the public realm will need to comply with the GPRS and preserve or enhance the character and appearance of the conservation area.

New street and traffic signage should be coordinated to avoid excessive use of new signage, including A-boards, particularly at the entrances to alleyways and back streets.

4.1.7 Advertisements

Aims: Shopfronts make a considerable and significant contribution to the conservation area and the installation of poorly designed shopfronts and signage have a negative impact. New shopfronts/signage should reflect the requirements of Gloucester City Council's adopted guidance on shopfronts, shutters and signage

Management Proposal 7: Gloucester City Council will consider the introduction of a Special Area of Control of Advertisements within part(s) of the City Centre Conservation Area.

4.1.8 Review Process

Aim: To review policies within this document on a regular basis to ensure that they remain relevant to any emerging and adopted policies and the condition of the Conservation Area.

Management Proposal 8: Gloucester City Council will undertake a 5 year review of this Conservation Area Appraisal and Management Plan, updating policy as required to

ensure the plan remains a useful, relevant working document and reflects the character and appearance of the conservation area.

4.1.8 Maintenance

Aim: To encourage owners to undertake minor works that will improve the condition and appearance of their properties which will have a wider positive impact on the Conservation Area as a whole.

Management Proposal 9: The Council recommends that regular maintenance is undertaken to retain the value of the attractive traditional features present within the City Centre Conservation Area. A lack of maintenance can lead to decay, deterioration and the need for more complex and expensive repairs.

Basic maintenance tasks include:

- The regular clearing of debris in gutters and rainwater pipes
- The pruning of vegetation near to buildings
- The re-fixing of loose roof tiles or slates
- The regular re-painting of timber

For further information on traditional building maintenance please contact heritage@gloucester.gov.uk

4.1.9 Sustainability/Regeneration

Aim: To offer increased residential opportunities within the city centre through the conversion and reuse of upper floors where appropriate.

Management Proposal 10: The conversion of upper storeys from commercial use to high quality residential will be encouraged where proposals retain an active street frontage, maintain surviving historic details, and where the impact of relevant planning requirements (for example cycle provision and refuse issues) do not have a detrimental impact upon the character or appearance of the Conservation Area. Retrofitting measures which improve the thermal or energy efficiency of a building will be supported in principle. Proposals which require the loss of original fabric, or which adversely affect the setting or character of an existing building are unlikely to be accepted, however, each proposal should be judged on a case-by-case basis.

4.2.0 Public Realm

Aim: To declutter the public realm

Management Proposal 11: To undertake an audit of the street furniture and street art within the conservation area with a view to its rationalisation and improved interpretation.

To be repeated on a 5 yearly basis.

4.2.1 The Via Sacra Aim:

To update the Via Sacra and improve its condition and interpretation.

Management Proposal 12: To undertake a review the route of the Via Sacra and to update it in accordance with the GPRS.

4.2.2

Local List

Aim: To preserve or enhance buildings that contribute positively to the conservation area

Management Proposal 13: To undertake a yearly review of the local list with particular regard to the City Centre Conservation Area. For further information on the Local List please see: [Gloucester's Local List - Gloucester City Council](#)

4.2.3 Buildings at Risk

Aim: To preserve or enhance buildings that contribute positively to the conservation area.

Management Proposal 14: To undertake a yearly review of the condition of buildings within the City Centre Conservation Area and update the 'at risk' register.

RELVEANT LINKS Policy Gloucester City Plan 2011-2031

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 Gloucester Heritage Strategy 2019-2029

Gloucester Public Realm Strategy Guidance Shopfronts, Shutters and Signage— Design Guidelines for Gloucester

City Centre Conservation Area Public Consultation and Adoption Report

Between Wednesday October 25th and December 20th 2023 a public consultation on the draft of the City Centre Conservation Area Appraisal and Management Plan was undertaken with the aim of obtaining public opinion on this document and the proposals within it.

The questions that were asked in the public consultation were:

1. What do you think about the City Centre Conservation Area Appraisal document?
2. What do you think about the management proposals made in the City Centre Conservation Area Appraisal document?
3. Are there any additional management proposals you think the document should make to help Gloucester City Council improve the City Centre Conservation Area
4. Is there anything else you would like to say about the City Centre Conservation Area, the Appraisal document, or the management proposals?
- 5.

Publicity was undertaken in a number of ways including information on the internet, on social media and in the local press. A mail out to all the residents/occupiers in the conservation area was also undertaken, and posters were put up.

Copies of the appraisal document were posted online, whereas hard copies were made available at the public library and the council offices. An additional hard copy was made available to the Westgate Residents Group.

A number of meetings were also held to promote the publication. To meet the requirements of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 Section 71, this included public meetings (2 were held) but also meetings with different stakeholders. A list of the meetings (put forward and actually held), as well as the number of attendees and a summary of their comments can be found on the following page.

To supplement this, a staffed 'drop in' stand was placed in Eastgate Shopping Centre to enable members of the public to talk to the GCC Heritage team about the document and provide their comments.

A total of 18 responses were submitted on the website, whereas a further 6 were submitted by email. These comments, and how they have been responded to, can be found later in this report.

An updated copy of the City Centre Conservation Area Appraisal and Management Plan, reflecting the comments put forward in the public consultation, is submitted with this report, for it to be considered for adoption by Gloucester City Council as a Supplementary Planning Document.

Consultation Record – Meetings and Mail Outs

Date and Location	Group	Attendees	Comments
14.11.23 and 07.12.23 6pm Guildhall	General Public	1 and 0	That the public consultation had not received wide enough publicity.
15.11.23 6pm Folk	Civic Trust	7	Issues raised included: general condition of city centre – dirty, lack of maintenance
24.11.23 4pm Guildhall	City Centre Commission	Approx. 20	Suggested use for Longsmith Street Carpark – multiuse community site.
05.12.23 6pm The Dukeries	Westgate Residents Group	14	Lack of street maintenance Parking on pavements, without action being taken. Concern that improvements end at Shire Hall rather than extending to the end of Westgate Street. Also wanted a connected approach from Westgate Street car park to draw in visitors. The inclusion of the trees bordering the Westgate Street car park within the conservation area was also suggested.
06.12.23	Stand at Eastgate Shopping Centre	12-15 people provided feedback	Issues raised focused on lack of maintenance and street cleaning. Streets appear dirty. Anti-social behaviour also an issue.
31.10.23	Consultation notification email	252 individuals and organisations contacted included Statutory Consultees	

28.11.23	Mail out to residents of CCCA	1133 residents contacted.	
	RTPI Young Planners		Did not happen as date could not be arranged.
	Gloucester College		Meeting could not be arranged, though informal feedback from students involved in a wider discussion has been provided. Issues they raised included concerns about feeling unsafe within Gloucester.
	University of Gloucester		No response

Responses received through the Public Consultation Website.

	What do you think about the CCCA Appraisal document?	What do you think about the management proposals made in the CCCA Appraisal document?	Are there any additional management proposals you think the document should make to help GCC improve the CCCA?	Is there anything else you would like to say about the CCCA, the Appraisal document, or the management proposals?
1	Excellent, informative and easy to access	I would support them	no	I fully support them
	Officer Comment: Thank you for your positive comments.			
2	<p>I think it addresses many of the concerns, but doesn't seem to action them. For example, under the SWOT analysis, it says as an opportunity "Ensure high quality new development that is sensitive to the historic city centre". Nothing that is currently being built in the centre is sensitive to the historic city centre. It is all modernist with old names 'friar orchard' etc.</p> <p>Like many cities in post-war Europe, when the opportunity arises, we should re-build as the towns were before post-war town planners and their modernist/car centric/brutalist approach.</p>	I agree with them - but as mentioned above, they don't seem to be practised. Unsympathetic buildings are planned and erected with little attention for the historic look and feel of Gloucester and will date awfully	Enforcement of your proposals. Force absentee landlords to vacate properties through compulsory purchases. Remove unsympathetic eyesore buildings that are vacant. Re-build Gloucester to look like it did before post-war modernism	As above

	<p>The Northgate street Sainsbury's is a classic example of this. https://www.punchline-gloucester.com/articles/aanews/sainsburys-site-in-major-bid-for-city-living-flats</p> <p>This is a 21st century version of what they did in the 60s, with very little care for the fact it's surrounded by medieval buildings. It should be built in character, and replicate what was there before a slab of concrete was placed there. That is how to give areas its identity back, bring back tourism and make a place unique. Every city is blighted with 21st century architecture that won't last. Let's make Gloucester different.</p>			
	<p>Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.</p>	Noted.	Noted.	
3	<p>Please consult us where the proposals may be affected by Severn Trent Water infrastructure. The public sewers and water mains records can be viewed via</p>			

	Digdat.co.uk. Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record.			
	Officer Comment: Thank you for contacting us regarding the City Centre Conservation Area appraisal and making us aware of the increase in public sewers.			
4	While the enhancements sound well-meaning, I find it hard to believe the fact tourism needs to include a lot more independent and other shops into the area seems to be omitted from the document. People want to shop and eat and drink out. Upgrading buildings is not enough. Landlords rents need to be brought down, out of town landlords need talking to. Where is the mention of clock in the arcade? That was not looked after? Other shops have moved out of Gloucester as lack of tourists from Japan and USA would visit that clock.	A bit lacking passion. It felt like a document done to appease a growing pissed off population, I don't see much community information in there. Are you consulting with shop owners?	Include bringing in independent businesses, other retail and talking to out of town landlords who are pricing local businesses out of the area. It is not just about the appearance of city but the 'feel' and right now it's dying.	Talk to the shop and business owners this time. Talk to businesses that have left to go to other areas (Hothouse that left to go Worcester for example who are now thriving there, the manager told me the clock not being taken care of reduced tourism). Stop driving everyone to the Quays and stop making the forum development and kings square a priority, you are trying to make a new centre for Gloucester and we will never see it that way.

	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Noted. All occupiers/residents of the conservation area were consulted.	Noted. The marketing of the city to attract businesses and visitors is beyond the scope of the conservation area appraisal.	Noted.
5	I think the document is very thorough and is an accurate description of the city centre.	I fully support the management proposals.	I think existing shops should be made (over time) to update their shopfronts to be more in keeping with the conservation area - with grants available for small businesses. Perhaps local signwriters could be commissioned.	
	Officer Comment: Thank you for your positive comments.		Funding has recently been made available in the Cathedral Quarter HSHAZ, but unfortunately at present there is no new funding available. Forcing shops to update is at the discretion of their owners/occupiers, it is not something a council can force.	
6	Well presented. An authoritative source of Gloucester history and proposes a considered sympathetic way forward .	Good	Yes. On going management of the plan need a specific management with authority.	No
	Officer Comment: Thank you for your positive comments.			

7	Good any regeneration is positive for the city	Fine	No	Not at the moment
	Officer Comment: Thank you for your comments.			
8	Conservation needs to be done sensitively and with historic accuracy.	Don't repeat the mistakes of past re-developments and lose the heritage of this historic Roman City.	It is essential to preserve the heritage and history of this City. So many opportunities if preservation have already been lost. If we had followed the examples of cities such as York & Chester, we would now be benefiting from excellent tourism.	During the next 9 days please ensure this appraisal document gets publicised as widely as possible. Spread the news in local radio etc. I found it by accident on social media
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.			
9	Not a lot to argue with!	Would like some constructive usage of the "negative" buildings - could paint and mouldings be used to turn them into, at least, interesting facades?	How are you going to get the right retail offerings? You can make the buildings as nice as anything but if the area remains full of vape shops and tattoo parlours (or simply empty premises) then it's going to be worthless effort.	More and better residential units would help. Can balconies be bolted onto flats? Are there grants available to improve interiors?
	Officer Comment: Thank you for providing your thoughts and suggestions on	Noted.		The encouragement of the sensitive conversion of upper floors to residential use is one of the management proposals put forward

	the City Centre Conservation Area appraisal.			in this appraisal, and something that that has been actively promoted through the HSHAZ.
10	It is a comprehensive and well written document. It may need a summary for people who don't wish to read the whole thing.	They are sensible, but may be difficult to achieve without some funding or political backing.	Shop front design and fascia signage should be better controlled. Other historic cities don't seem to have the same problem of inappropriate designs, sizes and materials with their shop fronts on older buildings.	I hope it is approved and implemented.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal. Noted.		The possibility of introducing an 'Area of Special Control' of advertisements will be put forward in the management proposals.	
11	A thorough and researched document. I have no specialist knowledge, yet it appears to adequately represent both the strengths and weaknesses of the Area.	I have reviewed solely with regard to extension of the Area at the West end of Westgate Street. Protecting the trees is worthwhile for the trees' worth, however the text seems to say that the trees' function is to shield the GCH apartments from view. Perhaps we should consider improving the exterior to these apartments?	As above, we should improve the exterior appearance of the GCH Westgate Estate. The improvements to Westgate Street are likely to end at Shire Hall. They should extend to Castlemeads Court, to lead visitors from the Westgate Street Car Park into town. We need a unified and attractive feel for this stretch of road.	Although outside the area, many residents are unaware of Alney Island and the Boating Lake. Could we include appropriate information boards at the Car Park and outside Castlemeads?

	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Thank you for your feedback on this specific proposal. The text in this part of the appraisal will be reviewed.	Noted.	This suggestion relates to land beyond the City Centre Conservation Area and the scope of this appraisal
12		<p>Several of the concepts need to offer a greater level of description, at the moment the management proposals offer an idea but would benefit from more detail.</p> <p>Graffiti and criminal damage are continually affecting every surface within an urban setting, a plan needs to be created to address these issues and have a clear process for removing the damage.</p>	<p>The policy needs to include more information about the legal implications and how Gloucester City Council intend to combat Heritage Crime.</p> <p>How does the policy address the preservation of public art and other features with significant cultural interest?</p> <p>A clear definition needs to be created which differentiates the features and characteristics of 'street art' from 'graffiti'.</p> <p>The idea that a building within the conservation area, who have become victims of crime, should be offered special measures or assistance when the fabric of the structure has been blighted by graffiti or criminal damage.</p>	A clearer definition within Paragraph 2.1.2 would be advantageous when it refers to buildings which have been identified as 'negative'. Architecture and history can be subjective and opinions may vary depending on political and cultural pressures of the time, therefore can a clear definition be provided to explain why one building could be positive, while another might be negative.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	<p>Noted.</p> <p>Measures are in place to address issues of graffiti and criminal damage through</p>	Thank you for your comments regarding Heritage Crime. Unfortunately, the LPA is not in the position to offer special measures or assistance when	The definition of 'negative' will be reviewed.

		<p>both the City Council and the local police.</p> <p>The City Council takes a proactive stance to the removal of graffiti on historic properties, and seeks funding from a range of sources to protect and repair heritage buildings</p>	<p>buildings within the conservation area are affected by heritage crime.</p>	
13	Timely	<p>Improvements must be made to enhance Gloucester as a tourist destination as well as for local residents.</p>	<p>Of immediate and one would presume lower cost implications would be better street cleaning and clearing of weeds at the edge of roads and buildings The Ladybellegate area is a particular eyesore.</p>	<p>Hope that some of the proposals come to fruition</p>
	<p>Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.</p>	<p>There are a number of schemes currently underway (for example the HSHAZ) that aim at enhancing Gloucester.)</p>	<p>Thank you for providing this information. It will be passed on to the relevant team within the council.</p>	
14				<p>In case you'd like to attract more visitors and locals more parking space would be essential. Try to keep or improve character of city centre of course 'hidden' spaces (roof parking or deep parking option) would be ideal. That's already a huge problem not only for visitors even more so the local (GL1) residents.</p>

	Officer Comment: Thank you for providing your suggestions on the City Centre Conservation Area appraisal.			Noted.
15	I am pleased to read such a well thought out and comprehensive, well detailed plan.	I agree with all the proposals for Guidelines and Enhancements in section 4 of the document. If these proposals are acted out in full, ensuring good quality of materials and in aesthetics, this should raise the profile and pride in this City both locally and nationally, and emphasise its beauty and historical importance.	Please see my answer number 4 below.	Improved cleaning of the streets and public seating could be carried out. For example, the streets and public seating were very dirty during the September 2023 Gloucester History Festival and ideally should have been cleaned before this event. This surely will showcase the City and give tourists a better impression of the City than they may have than at the present time. Improved police patrols would decrease the amount of antisocial behaviour i.e. drinking in the streets and open areas, and shouting from individuals. Also vehicles using the pedestrianised areas and acting recklessly. These daily occurrences make it unpleasant for all those who visit the City, whether locals or tourists.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Noted.		Thank you for providing this information. It will be passed on to the relevant team within the council.
16	It is interesting as a starting point but does not include the social and economic	As above	Not a simple problem to fix – prevalence of homelessness, anti-social behaviour at all times	Page 35 – photo is of May Hill and the Forest of Dean hills, not the Malverns!

	factors that affect how any changes that are implemented will work with the reality of the existing communities in the CA.		of the day, even down to the casual littering. All make a negative impact and hard to see how the proposals take this into account. A cultural centre that is only affordable to some. There are already so many things in the CCCA that are only affordable to the minority. And there is already noise at anti-social hours that negatively impacts life in Greyfriars community.	
	Officer Comment: Thank you for providing your comments on the City Centre Conservation Area appraisal.		Noted.	Noted. This will be amended.
17	The appraisal is very thorough from a heritage perspective, but there is very little reference to how people might best access the Conservation Area from an active travel perspective, or how physical activity can be facilitated or encouraged. There is mention of enhanced pedestrian links, but no reference to accommodating cycling and wheeling, or wellbeing more generally.	As above, it would be good to see some comment or detail on how physical activity and active travel can be supported. All places and spaces should encourage physical activity, not just buildings and facilities for sport, activity and leisure, but open spaces, green infrastructure, urban public realm, heritage assets and streets. Providing multifunctional spaces allows for physical activity to be delivered alongside other priorities,	Active Gloucestershire would strongly recommend that reference is made to Sport England's Active Design Guidance - https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design . The City Council should also consult the resources available on the Healthy Streets website - https://www.healthystreets.com/	Active Gloucestershire would be very happy to work with the city council to explore how physical activity can be supported and promoted within the city centre conservation area. Please contact Richard Fishlock - Strategic Lead for Facilities & Active Environments - richardfishlock@activegloucestershire.org

		such as biodiversity, community space, sustainability or other needs, enabling the function of spaces to be maximised.		
	Officer Comment: Thank you for providing your comments on the City Centre Conservation Area appraisal.	Noted.	Noted.	Noted. The encouragement of physical activity and active travel are beyond the scope of this document, however, the Council is keen to encourage them and already works with Active Glos as well as other partners to encourage pedestrian and cycling access to the city centre and to lengthen dwell time.
18				I would like to see more greenery and trees in the city centre to soften up the landscape, and I would like to see fewer new buildings. Collectively we should be spending more money on derelict and old buildings Public art is a good thing, and the art we have in the city centre is ok, but often it gets out dated (like the CD rack on Southgate Street), so we need to ensure that public art in the city centre is somehow future-proofed.
	Officer Comment:			Noted.

	Thank you for providing your comments on the City Centre Conservation Area appraisal			The introduction of more greenery, including trees, to the city centre is beyond the scope of this document, however, the Council recognises their importance to creating a vibrant and attractive city centre and is continually delivering projects that will provide greenery (eg Westgate Street).
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Organisation	Comments Received	Officer Comment
Canal and Rivers Trust	'The Trust have reviewed the document and policies contained within it, and based on the information available we have no comment to make.'	Noted.
National Highways	'Thank you for providing National Highways with the opportunity to comment on the Gloucester City Centre Conservation Area Appraisal. As you are aware, National Highways are responsible for the strategic road network which in Gloucester comprises the A40 and A417 trunk roads and the M5. Having reviewed the documents provided we are satisfied that the proposals within them are unlikely to result in an adverse impact upon our network and we therefore have no comments.'	Noted.
Gloucestershire Wildlife Trust	<p>I am writing to you to provide Gloucestershire Wildlife Trust's (GWT) response to the Gloucester City Centre Conservation Area Appraisal.</p> <p>We acknowledge that this appraisal is strongly centred around heritage, but it is an opportunity to highlight the important role that green infrastructure (GI) has to play in helping to; support and protect heritage sites and surrounding urban areas from the impact of climate change, (including urban heating and flooding); making them better spaces for nature; and adding to their visual appeal and supporting the well-being of Gloucester's residents and visitors. Various studies show the benefits of nature-based solutions to heritage sites, which prevent them from becoming grey 'historic holes' in cities. The Gloucester City Plan also raises the importance of greening urban areas with more GI, to support biodiversity and tackle the impacts of climate change (addressing the climate emergency</p>	<p>Noted.</p> <p>The Council acknowledges the importance of Green Infrastructure to tackling climate change as well as creating a pleasant and attractive environment in the city centre.</p> <p>The City Centre Conservation Area appraisal document acknowledges the positive impact that the introduction of greenery has on the built, historic environment but it is not strictly within the scope of the document to address it. However some amendments have been</p>

	<p>declared by the City Council). The current document doesn't make the most of this opportunity and we would like to see some amendments to take this into account.</p> <p>A few comments are made throughout the document that acknowledge the lack of green infrastructure and its importance. For example, page 21 recognises the ambiance that street trees create in urban areas. It also references the visual contrast they provide in high density, hard landscaped areas. Page 23 states that there is a limited amount of vegetation in the Gate Streets character area, which could be improved, and that St Mary de Crypt is a valued rare greenspace. Page 24 states that the introduction of more needed greenery in Westgate Street is planned for 2024. There is a clear acknowledgement of the need for more GI across these heritage sites. However, in the weakness and opportunities for each of the character areas, there is very little reference to the role that GI could play, which suggests a lack of commitment to incorporating it.</p> <p>We appreciate that maintenance of green infrastructure in cities is often one of the main reasons for the lack of it. This should not be a blocker to its implementation. For example, there could be opportunities for local businesses to sponsor/support in the maintenance of GI (for example, maintaining planters near to their offices or in spaces they can go and sit for breaks/lunch). This could be through volunteer days for staff, for example. An opportunity for businesses to show an expression of interest in supporting this could be provided. Raingardens can also be a low maintenance option to planters and may be a good alternative in some places. GWT have done a lot of work in Gloucester in the past to support the delivery of planters,</p>	<p>made to be made to appraisal document to provide more references to green infrastructure.</p>
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	<p>trees and raingardens, and we would be happy to provide our expertise to support in their delivery.</p> <p>There are some areas mentioned in the consultation which have very little GI and a lot of hard landscaping and therefore act as barriers for wildlife to move through the city. Adding planters or more native street trees where possible could help to address this. Sadly, some areas, including Kings Square, have undergone recent regeneration which did not incorporate much additional green space. This could have reduced the amount of surface water run-off during heavy rainfall leading to potential flooding, in a city which is already facing a growing threat from flood risk. To help mitigate the impacts of increased flood risk, more planters or rain gardens could be added to the area. These should include attractive native, flowering plants that are good for pollinators and will help to increase biodiversity and bring nature into the city, as well as providing some resilience to climate change impacts. Future regeneration projects must have sufficient GI incorporated into their designs.</p> <p>It is good to see important trees highlighted in the appraisal, which also references the need for more street trees. Trees are important for biodiversity but also to ameliorate the impact of climate change, providing some protection against flooding and urban heating. Trees also help to absorb pollutants and provide cleaner air, which can help to protect heritage sites and the health of the city's residents. Visually, trees provide attractive spaces that support well-being. For these reasons, existing street trees should be protected and opportunities for planting new street trees, especially in areas that have very few, should be sought.</p>	
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	<p>GWT represents natural heritage as part of the Gloucester Natural Heritage Forum. We would be happy to have a discussion through this forum on ways we can support in the planning and delivery of effective GI across historic sites in the city.</p>	
Historic England	<p>Thank you for your email of 31st October 2023, inviting us to comment on the draft Conservation Area Appraisal and Management Plan for Gloucester City Centre Conservation Area. We recognise and commend the effort taken to arrive at this stage in the process. There is much to admire in the work so far. We would like to offer some comments that may help refine and improve the emerging document.</p> <p>The Presentation of Information</p> <p>The textual presentation of the survey is thorough and presents a fairly complete understanding of the Conservation Area. However, at present the document mainly relies on written descriptions. For somebody not familiar with the area, a study biased to a textual understanding might make the document difficult to follow. We think that there is a valuable opportunity to make greater use of visual aids to support the textual narratives and assist those not used to reading Conservation Area Appraisals.</p> <p>We welcome the maps at end of the document; however, the legibility of the study could be significantly improved if it were supported graphically by way of more specific annotated maps, at appropriate places throughout the document. Below, we have detailed some of the key places that would benefit from bespoke illustrations, and we suggest what might be illustrated at each point.</p>	<p>Once the content of the appraisal document has been adopted, then a graphic designer will be consulted to advise on the presentation of the document.</p>

	<ul style="list-style-type: none"> • 1.5 Context (regeneration initiatives) <ul style="list-style-type: none"> ○ it would help to have a map that illustrated the relationship between the various schemes described. • 2.1 Understanding the site <ul style="list-style-type: none"> ○ it would help to have a map that illustrated the relationship between the various parts of the site described. • 2.7 Historical development <ul style="list-style-type: none"> ○ this section would benefit from a historical “map-regression” study, showing how the site evolved over time. • Chapter 3 <ul style="list-style-type: none"> ○ Each of the areas would benefit from an annotated map, illustrating the key locations and buildings referred to in the text. <p>Similarly, it might help to further reconsider the hierarchy of textual and visual information being presented. The use of other graphic design strategies may further help with legibility. Such graphic design devices can help to make important observations stand out. For example: significant conclusions and critical observations might be highlighted somehow from the background text; or new proposed policies could be placed within a coloured box.</p> <p>Finally, the document would benefit from photographic examples that illustrate various points being made within the text. For example, illustrating where parts of the conservation area are clearly challenged by existing development; or, where recent interventions have worked particularly well; or, where</p>	
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	<p>there are serious threats to the character of the Conservation Area.</p> <p>SWOT Analysis</p> <p>It was a wise move to undertake the five individual SWOT analyses, one for each Character Area. However, the outcomes currently seem quite generic and do not appear to sufficiently interrogate each of the Character Areas.</p> <p>We feel that that more detailed thought could be given to each of the SWOT analyses, aiming at revealing more unique, site-specific observations under each heading of the SWOT study.</p> <p>Identifying the very particular identity and challenges of each Character Area ought to lead to a clearer understanding of any opportunities. In turn, this will suggest more focused ideas about of how to manage the various Character Areas. Such deeper interrogation will make it much easier to frame more tightly focused management policies that are likely to add most value to the whole exercise.</p> <p>This further interrogation might take a closer look at the areas that are particularly sensitive and may require special policies to protect or enhance them. Similarly, it would be helpful to identify where significant opportunities exist to accommodate change in a way that most benefits the Conservation Area. A few pertinent questions might help get this exercise started:</p> <ul style="list-style-type: none"> • What is unique and valuable about this Character Area? • What aspects may require special protection, or specific policies? 	<p>Noted: A review of the SWOT analysis (using the questions suggested by Historic England) has been undertaken.</p>
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	<ul style="list-style-type: none"> • What is currently the biggest threat to the Character Area? • Is there something lacking? ... either tangible, or intangible that could enhance the experience here? • Is there something negative that we would obviously want to change, if the opportunity arose? • What policies might encourage such opportunities to emerge? <p>Demolition On page 55, the strategy of demolition is considered:</p> <p><i>“Demolition is only likely to be permitted for the replacement of buildings identified as ‘negative’ within this conservation area appraisal.”</i></p> <p>Given the prevailing direction of sustainable development policy, it is becoming more and more likely that demolition should only ever be permitted as a final resort, where all other options for re-use have been ruled out. Perhaps the wording of this policy could be strengthened to support a stronger stance on sustainability?</p> <p>Townscape Important Townscape views are mapped on page 61. This study is an important consideration, but probably needs expanding somewhat. It would help to see the views illustrated photographically alongside the map, with some narrative about the importance of each key view. Furthermore, it might be useful to identify more distant views that illustrate the skyline of the city. This “distant view study” could reveal the potential impact of any proposed larger developments on the Conservation Area. A suitable narrative on these key views will</p>	<p>Noted.</p> <p>Thank you for this suggestion. A distant view study will be added to this document.</p>
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	<p>help moderate future development in a way that respects, protects and enhances the Conservation Area.</p> <p>Working With Partners and Encouraging Appropriate Activity A successful Conservation Management Plan will seek to identify key stakeholders and find appropriate ways to work with them. Therefore, it is essential to identify the key group of partners, who are best placed to identify appropriate activities that will support the Conservation Area into the future and assist with framing the right policies to achieve this.</p> <p>Conclusion We hope that our comments have been helpful. We look forward to seeing the next, or final draft of the document and wish Gloucester City Council's Conservation Team well with their ongoing work.</p>	<p>Once the appraisal has been adopted, key stakeholders for example GCC - Heritage, Economic Development, City Centre Team, Housing Team etc, also BID, Solace, City Centre Commission, Historic England will be fed back to regarding the key points of the appraisal and the issues raised in the public consultation</p>
SF Planning	<p>Comments on Section 2.2 – Changes to the Conservation Area Boundary.</p> <p>Land to the North of Westgate Street (at junction with fountain Square) The Council outlines the rationale as follows; “The Dukeries is a 1960’s residential development to the northern side of Westgate Street and is outside the network of conservation areas which surround the city centre. Nos 102-106 Westgate Street stand to the east of this and are of similar period of development. Both ranges of buildings are noticeably at odds with the buildings on Westgate Street, due to their scale, mass, materiality, condition and detailing, and as such, detract from their setting. The areas of public realm, including soft landscaping and trees to the front of these buildings are an</p>	

	<p>important buffer which provide a significant piece of landscape to the streetscape, and as such it is felt that they should be protected from removal as this would have a detrimental impact on Westgate Street, as well as on the setting of St Nicholas Church This small alteration to the conservation area boundary would provide this protection."</p> <p>SF Comments: The new designation does not appear to cover the buildings themselves, only the area in front. Whilst protection of the trees which improve the visual appearance of these buildings is understandable and entirely sensible; there is a question as to whether it is more appropriate to protect the trees using a tree preservation order. This is because paragraph 191 NPPF states that; "When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest". The Council appear to be quite clear that these buildings lack historic interest and detract from the conservation area. Therefore, the designation does not appear appropriate when reviewed against paragraph 191. Also, Tree Preservation Orders are entirely appropriate to provide the protection required by the Council, for the reasons they require it. In Tree Preservation Orders: A Guide to the Law and Good Practice prepared by what was DCLG it is stated that; "3.1 LPAs may make a TPO if it appears to them to be: 'expedient in the interests of amenity to make provision for the preservation of trees or woodlands in their area' ...3.2 The Act does not define 'amenity', nor does it prescribe the circumstances in which it is in the interests of amenity to make a TPO. In the Secretary of State's view, TPOs should be used to protect selected trees and woodlands if their</p>	<p>Thank you for your comments on this issue. Its presentation will be reviewed.</p>
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	removal would have a significant impact on the local environment and its enjoyment by the public." The Council should not be using the conservation area appraisal as a means of doing something which is more appropriately achieved by other means.	
	<p>Comments on Section 4 – suggested guidelines and enhancements</p> <p>2.1 Comments on Section 4 – suggested guidelines and enhancements 2.1</p> <p>It is our view that Section 4 should confirm the intended status of the 'policies' outlined in that section. Our understanding is that they are to be used as guidance when making decisions on development within or affecting the conservation area which makes sense and is consistent with the use of conservation area appraisals generally. However, the language used gives the impression that they could be considered on par with local plan policies which would not be the correct approach and may confuse members of the community accessing this document. Some small changes to wording should rectify this.</p>	<p>Noted. Thank you for your comments on this issue. To avoid confusion, what were referred to in the draft appraisal as 'policies' will be amended to 'management proposals' The appraisal, one adopted will be a Supplementary Planning Document, which support policies in Gloucester's adopted City Plan.</p>
	<p>Comments relating to sections 4.1 and 4.2 are outlined below, underneath the relevant text in italics</p> <p><i>4.1.1 Development will respect the scale, design, proportions, grain, and materials of the surrounding architectural vernacular. Detailing should be characteristic of the area and retain any historic plot boundaries/ historic street layout. Development will be of a high quality design which reflects its immediate context and sits comfortably with its setting and in important views</i></p> <p>SF Comment</p>	

	<p>The requirement to retain historic plot boundaries and historic street layout should be to retain any known historic plot boundaries/street layout as the document itself confirms that this is not always clear. Should this say 'retain' important views or perhaps something similar? – the final sentence doesn't appear to make sense.</p>	<p>To add the word 'known' to this part of the text could leave as yet unidentified historic boundaries/layouts vulnerable to change which could be harmful to the character of the conservation area. This part of the text will not be amended.</p> <p>'Important views' – minor text amendment</p>
	<p><i>4.1.2 The full or substantial demolition of buildings or structures identified as making a positive contribution to the significance of the Conservation Area (including NDHAs) is harmful to the significance of Conservation Areas and will be regarded as substantial harm or less than substantial harm according to the circumstances of the case. Demolition of buildings identified in this document as making a neutral contribution to, or detracting from, the Conservation Area's special character will only be supported where there are acceptable plans for the site following demolition. Proposals which look to adapt existing buildings in some form and support the climate change agenda will be positively received. Demolition is only likely to be permitted for the replacement of buildings identified as 'negative' within this conservation area appraisal.</i></p> <p>SF Comment</p> <p>Once again this appears to be generally consistent with the aims of the conservation area designation and policies within the local plan.</p> <p>However, it is important to recognise that the protection and enhancement of existing heritage assets and their settings</p>	<p>Noted. With regard to the request of a more nuanced approach, as the</p>

	<p>should be in proportion with the significance of the asset, in accordance with both local and national policy. Therefore, the strategy advocated here should allow for a more nuanced approach, factoring in the significance of the asset and the level of contribution (i.e. the fact that some buildings make more of a positive contribution than others). The drafting should be more detailed to account for this.</p> <p>There is little to explain what constitutes substantial demolition; some brief guidance on that would assist.</p> <p>The fact that demolition of neutral and negative buildings will only be permitted if there are acceptable plans following demolition is vague. What is meant by acceptable? Does this mean a proposal which accords with local policy? Is this simply an assessment in heritage terms?</p> <p>It may also be beneficial to have different approaches for neutral and negative buildings. The wording doesn't make it clear whether buildings which 'detract from' the conservation area's special character are intended to refer to negative buildings. Our initial reading was that it intended to refer to negative buildings but then there is a separate part of the policy which refers directly to negative buildings, so some clarity would be helpful.</p> <p>The final part of the policy 'demolition is only likely to be permitted for the replacement of negative buildings' is unduly restrictive and doesn't account for where a negative building might be demolished to allow for a use which does not necessarily involve the erection of a replacement building (e.g. open space, perhaps in support of a wider scheme). We think the intention here is to clarify that the building should not be</p>	<p>document states that the level of harm will be determined on the on the 'circumstances of the case', it is not felt that this needed.</p> <p>When an application is made, it will be up to the planning case officer (in accordance with national legislation and policy, local policy and guidance and input from consultees) to determine what is acceptable.</p> <p>Noted. This part of the document will be reviewed.</p> <p>Opinions to this Management Proposal have been mixed, with other consultees suggesting that it is too lenient. A review of this proposal has been carried out.</p>
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	demolished to reduce the site to a vacant plot, but the wording could perhaps be revisited to clarify this.	
	<p>4.1.3 <i>The removal of historic boundary treatments will be resisted where there is no justifiable reason for their removal. Where new or replacement boundary treatments are required, they should use a local and traditional material palette and be of appropriate scale and design.</i></p> <p>SF Comment</p> <p>This has the potential be the source of a reasonable amount of debate in respect of individual developments. The policy should make it clear what sort of information (if any) is expected in order to demonstrate whether something is justified so the bar is set at an appropriate level which is clear from the outset.</p>	<p>Bearing in mind that the loss of historic boundary treatments is likely to detrimentally impact on the character and appearance of the conservation area, (a designated heritage asset) justification would need to be in the terms of public benefit to accord with the requirements of the NPPF, if the harm is less than substantial. (If the harm was substantial, there would be additional requirements to accord with the NPPF.</p>
	<p>4.1.4 <i>The loss of architectural features such as the removal of existing chimneys or loss of traditional windows and doors will not be supported. In addition, when undertaking repairs to traditional buildings, appropriate traditional materials and fixtures and fittings should be used, for example lime mortars and renders and cast-iron rainwater goods. The use of non-traditional materials/fixtures and fittings, for example cement-based mortars and renders, uPVC windows, and plastic rainwater goods, will not be supported. The painting or rendering of unpainted brick or stonework will not be supported. PV and thermal panels, satellite dishes, TV aerials, meter boxes and</i></p>	

	<p><i>other modern additions will not be resisted, as long as they do not impact on the character and appearance of the Conservation Area. Locating them on the rear elevations or rear roof slopes may be an option.</i></p> <p>SF Comment <i>This should make it clear that the loss of such features will be permitted where these make a positive contribution to the building/conservation area generally. There may be many reasons why removal of these features is appropriate and acceptable.</i></p> <p>The requirement to use traditional materials where it is feasible to do so would be appropriate (e.g. where the materials and expertise are available). Additional wording should be considered here to make that clear.</p>	<p>Thank you for your comments on this issue. The text will be reviewed and amended.</p> <p>The suggestion regarding the use of traditional materials has the potential to undermine the character of the conservation area. This section of text will not be amended.</p>
	<p><i>4.1.5 The loss of historic shopfronts or historic features will be resisted. Proposals for new shopfronts or signage must be in line with the requirements set out within the adopted Gloucester City Council guidance on shopfronts, shutters and signage or GCC Local Plan.</i></p> <p>SF Comment Whilst the appraisal identifies historic shopfronts in some detail, it is less clear what is meant by 'historic features'. Could more explanation be included?</p>	<p>Details of 'historic features' have been added to the text.</p>
	<p><i>4.1.6 The loss of historic elements of the public realm will not be supported. Where alterations to the public realm, or the addition of new elements/replacement items are required, they should respect the traditional materials and character of the Conservation Area and/or comply with the recommendations</i></p>	

	<p><i>within the Gloucester Public Realm Strategy (GPRS). Temporary repairs to hard landscaping which are not in keeping with original materials should be replaced on a like-for-like basis within 12 months of their installation. Major new developments which require changes to the public realm will need to comply with the GPRS and preserve or enhance the character and appearance of the conservation area. New street and traffic signage should be coordinated to avoid excessive use of new signage, including A-boards, particularly at the entrances to alleyways and back streets.</i></p> <p>SF Comment</p> <p>Whilst a clear time limit for temporary hard surfacing to be in place is welcomed, 6 months may be unduly restrictive. If the hard landscaping is within adopted highway, it may take time to obtain the necessary consents both to do the work and to temporary stop up/divert the highway. The requirement should perhaps be for reasonable endeavours to be made to replace within 6 months.</p> <p>Street signage in particular has the potential to bring benefits to the conservation area for example by outlining the history of this part of the conservation area (e.g. the historic plot markings on Westgate street) and signposting people to other historical parts of the city. If there is a specific concern with A boards, the policy could make the restriction relate to this. Street signage more generally should simply be considered on its own merits, particularly when it is unclear what is meant by 'excessive'</p>	<p>Thank you for your comment. This has been reviewed and changed to 12 months.</p> <p>That street signage can bring benefits is not disputed. However, a review of street furniture (including signage) was undertaken as a part of this appraisal and during this process it became apparent that not only was there considerable redundant signage, but also different signs performing the same function.</p>
	<p><i>4.1.7 Gloucester City Council will undertake a 5 year review of this Conservation Area Appraisal and Management Plan, updating policy as required to ensure the plan remains a useful,</i></p>	

	<p><i>relevant working document and reflects the character and appearance of the conservation area</i></p> <p>SF – No comments</p>	
	<p><i>4.2.1 The Council recommends that regular maintenance is undertaken to retain the value of the attractive traditional features present within the City Centre Conservation Area. A lack of maintenance can lead to decay, deterioration and the need for more complex and expensive repairs. Basic maintenance tasks include:</i></p> <ul style="list-style-type: none"> <i>• The regular clearing of debris in gutters and rainwater pipes</i> <i>• The pruning of vegetation near to buildings</i> <i>• The re-fixing of loose roof tiles or slates</i> <i>• The regular re-painting of timber</i> <p>SF comment</p> <p>These matters are mostly outside of development control, save where they relate to listed buildings or where consent is required in respect of trees or hedgerows. The Council should be clear that this policy is not intended to negate the need for necessary consent so as to avoid confusion from local people.</p>	<p>Thank you for your comments on this matter.</p>
	<p><i>4.2.2 The conversion of upper storeys from commercial use to high quality residential will be encouraged where proposals retain an active street frontage, maintain surviving historic details, and where the impact of relevant planning requirements (for example cycle provision and refuse issues) do not have a detrimental impact upon the character or appearance of the Conservation Area. Retrofitting measures which improve the thermal or energy efficiency of a building will be supported in principle. Proposals which require the loss of original fabric, or which adversely affect the setting or character of an existing building are unlikely to be accepted,</i></p>	

	<p><i>however, each proposal should be judged on a case-by-case basis.</i></p> <p>SF – No comments</p>	
	<p>4.2.3 To undertake an audit of the street furniture and street art within the conservation area with a view to its rationalisation and improved interpretation. To be repeated on a 5 yearly basis.</p> <p>SF – No comments</p>	
	<p>4.2.4 <i>To undertake a review the route of the Via Sacra and to update it in accordance with the GPRS.</i></p> <p>SF comments</p> <p>This policy is supported. We consider that more could be done to explain the route (this may fit in with the audit outlined at 4.2.3)</p>	Noted.
	<p>4.2.5 <i>To undertake a yearly review of the local list with particular regard to the City Centre Conservation Area. Current recommendations for Local Listing within the City Centre Conservation Area include the Regal and the Post Office (King's Square) and 3-5 Westgate Street.</i></p> <p>SF Comments</p> <p>Clarity on which buildings are locally listed, and the important features of those buildings is welcomed. We agree with regular updates which reflect how circumstances are changing across the city, particularly taking into account the various regeneration projects which are ongoing.</p>	Noted. A link to Gloucester's Local List has been added to the appraisal document.

<p>Housing Strategy Team</p>	<p>Section 1.1 Page 1 Para 6</p> <p>Text</p> <p><i>Consequently, it is important that this document is read in conjunction with additional guidance and local and national policy documents. Where applicable links have been provided to the documents to provide additional guidance. This appraisal forms part of the Council's Historic Environment Record and evidence base for the Local Plan</i></p> <p>Comment</p> <p>Use of living standard and building place where people want to live balanced against impact, thinking about amenity space provision as well as NDSS, How does it support SD11 mixed and balanced communities</p> <p>Section 1.6 Page 6 Para 2</p> <p>Text</p> <p>The National Planning Policy Framework (NPPF) 2021 provides national policy. Protecting and enhancing the historic environment is a key component of the NPPF's drive to achieve sustainable development.</p> <p>Comment</p> <p>See above</p> <p>Section 1.6 Page 6 Para 5</p>	<p>The focus of this document is a specific part of Gloucester's heritage, its protection and enhancement, rather than its role in specific housing policies. However, this does not mean that the guidance in this document is not supportive of SD11 when development is sensitively handled.</p>
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	<p>Policy SD8 in the Joint Core Strategy concerns the historic environment and it states that 'Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment' and that 'Designated and undesignated heritage assets and their settings will be conserved and enhanced as <i>appropriate to their significance</i>, and for their important contribution to local character, distinctiveness and sense of place...Development should aim to <i>sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation</i>'.</p> <p>Section 1.6 Page 6 Para 6</p> <p>Text</p> <p>Policy D1 of the Gloucester City Plan focuses on the historic environment; it states that '<i>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings</i>'</p> <p>Comment No mention of enhancement – proposals can hook on too this.</p> <p>2.2 Boundary alterations</p> <p>Text</p> <p>Area 1 – Area of green on the northern side of Westgate Street</p>	<p>Noted.</p>
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	<p>3.1 The Gate Streets</p> <p>With elements of the Roman, Saxon and Medieval town plan still clearly evident, in the form of the street layout, burgage plots and hidden alleyways, part of the Gate Streets character and importance lies in its historic origins and plan form. This is supplemented and enriched by the area's historic buildings, <u>whose variety and quality are exceptional.</u></p> <p>3.1.1 TOWNSCAPE CHARACTER</p> <p>Text</p> <p>Today it is an area <u>dominated by retail</u>, one that is predominantly pedestrianised, with vehicular access limited to this space for much of the day. As such part of the character within this part of the conservation area lies in the shopfronts and the activity bought by visitors, workers, and shoppers.</p> <p>Comment</p> <p>Does the plan address who this might be changed to reflect changing nature of cities and retail in particular</p> <p>Land uses Page 16</p> <p>Text</p> <p>Moves to encourage the residential use of the often vacant upper floors within parts of the character area are currently being undertaken as part of the Gloucester's Cathedral Quarter</p>	<p>The City Plan acknowledges the changing economy in the city centre, away from retail and towards other commercial and residential uses. The City Centre Conservation Area Appraisal also acknowledges this, for example in regard to its management proposal of the conversion of upper floors.</p>
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	<p>HSHAZ; the repopulation of the city centre is a wider aim of the city council.</p> <p>Comment</p> <p>s/a</p> <p>3.1.4 CONDITION AND THREATS</p> <p>Text</p> <p>Whilst the Gate Streets contain some of the most important elements within the conservation area, their condition, both in terms of the built environment and the public realm, gives cause for concern, with many buildings in a poor and deteriorating condition, a proliferation of inappropriate signage, as well poorly maintained and outdated street surfaces and furniture. Whilst the current HSHAZ scheme has provided some funding to assist owners of buildings in Westgate Street to repair and restore their buildings, and to enable the conversion of upper floors to residential use, many buildings remain within the Gate Streets that are in need of repair and maintenance. The number of vacant premises in this character area, especially at ground floor level, exacerbates this concern.</p> <p>Comment</p> <p>Residential alongside patient investors need to be seen as an opportunity</p> <p>Character Area SWOT s</p> <p>Text</p>	<p>Noted.</p>
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	<ul style="list-style-type: none"> • The Gate Streets • Brunswick Road, Greyfriars and Eastgate • Quay Street, Longsmith Street and Ladybellegate Street • King's Square and King's Walk Character Area <p>Opportunities Ensure high quality new development that is sensitive to the historic city centre</p> <p>Threats Increasing number of vacant premises – shops and upper floors</p> <p>Comment A generic approach to opportunities could a more granular approach better steer development ie focus on HSAZ to create resi. What does high quality mean – nb comments re living standards, is there a tension between achieving high quality livings standards eg amenity space NDSs and EPC ad heritage. NB threat can be viewed as an opportunity, more resi. Will create more demand for services and retail.</p> <p>4. Guidelines and enhancements</p> <p>Text The principal aim of the following policies is the preservation or enhancement of the character and appearance of the City Centre Conservation Area, which will be brought about through the sensitive conservation of its historic elements, combined with positive change and regeneration where required.</p> <p>Comment</p>	<p>Noted.</p>
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	<p>Policy or guidance?</p> <p>4.1.1 Development Proposals:</p> <p>Text Aim: Development proposals will preserve or enhance the City Centre Conservation Area's character and appearance and conform to local policies as outlined in section D1 of the Gloucester City Plan</p> <p>Comment Policy: Development will respect the scale, design, proportions, grain, and materials of the surrounding architectural vernacular. Detailing should be characteristic of the area and <u>retain any historic plot boundaries</u>/ historic street layout. Development will be of a high-quality design which reflects its immediate context and sits comfortably with its setting and in important views</p> <p>How is this balanced against other policies and regulation lacking any wiggle room vis a vis different heritage values</p> <p>4.1.2 Demolition of Buildings</p> <p>Text Aim: To ensure the significance of the Conservation Area is preserved and that any future development enhances its existing positive characteristics. Policy: The full or substantial demolition of buildings or structures identified as making a positive contribution to the significance of the Conservation Area (including NDHAs) is harmful to the significance of Conservation</p>	<p>Noted. This will be reviewed.</p> <p>Historic boundary treatments are features that usually make a positive contribution to the character and appearance of the conservation area, (a designated heritage asset). If their removal impacts on this, then as in cases of harm to designated heritage assets, the harm would need to be balanced against the public benefits of the proposals. (This is in cases of less than substantial harm. If the harm was substantial, there would be additional requirements to accord with the NPPF.)</p>
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	<p>Areas and will be regarded as substantial harm or less than substantial harm according to the circumstances of the case. <u>Demolition of buildings identified in this document as making a neutral contribution to, or detracting from, the Conservation Area's special character will only be supported where there are acceptable plans for the site following demolition.</u> Proposals which look to adapt existing buildings in some form and support the climate change agenda will be positively received. Demolition is only likely to be permitted for the replacement of buildings identified as 'negative' within this conservation area appraisal.</p> <p>Does this creates a risk that buildings will not be refurbished</p> <p>4.1.3 Boundary Treatments</p> <p>Text Aim: Development proposals will preserve historic boundaries; new boundary treatments will be harmonious with surviving historic examples. Policy: The removal of historic boundary treatments will be resisted where there is no <u>justifiable reason for their removal</u>. Where new or replacement boundary treatments are required, they should use a local and traditional material palette and be of appropriate scale and design.</p> <p>Comment Potentially will limit enhancements that would create better living standards, what is a justifiable reason?</p> <p>4.2.2 Sustainability</p> <p>Text</p>	<p>It is not believed that it will.</p> <p>See response to SF planning above.</p>
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	<p>Regeneration Aim To offer increased residential opportunities within the city centre through the conversion and reuse of upper floors where appropriate. Enhancement Policy: The conversion of upper storeys from commercial use to high quality residential will be encouraged where proposals retain an active street frontage, maintain surviving historic details, and where the impact of relevant planning requirements (for example cycle provision and refuse issues) do not have a detrimental impact upon the character or appearance of the Conservation Area. Retrofitting measures which improve the thermal or energy efficiency of a building will be supported in principle. Proposals which require the loss of original fabric, or which adversely affect the setting or character of an existing building are unlikely to be accepted, however, each proposal should be judged on a case-by-case basis</p> <p>Comment</p> <p>What does high quality mean?</p> <p>Can we take a progressive approach to street storage of bicycles?</p> <p>This may be problematic in terms of thermal efficiency – what are the possible solutions here to retain fabric but improve performance (technical appendix?)</p>	<p>In this instance it refers to development that is sensitive to its context, and which provides a good standard of accommodation.</p> <p>All proposals will be dealt with on their own merits.</p> <p>It does not need to be, retrofitting can be undertaken in a sensitive manner.</p>



Meeting:	Cabinet Council	Date:	6 March 2024 21 March 2024
Subject:	Capital Strategy 2024/25		
Report Of:	Cabinet Member for Performance and Resources		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	Yes
Contact Officer:	Richard Wintour, Accountancy Manager		
	Email:	Tel: 396439	
	Richard.wintour@gloucester.gov.uk		
Appendices:	1. Capital Strategy 2024/25		

FOR GENERAL RELEASE

1.0 Purpose of Report

1.1 To formally recommend that Council approves the attached Capital Strategy.

2.0 Recommendations

- 2.1 Cabinet is asked to **RECOMMEND** that the Capital Strategy be approved.
- 2.2 Council is asked to **RESOLVE** that the Capital Strategy at Appendix 1 be approved;

3.0 Background and Key Issues

- 3.1 The Capital Strategy focuses on core principles that underpin the Council’s five year capital programme, providing a position statement of progress (capital expenditure) and the resources available (funding). The Strategy projects the Capital programme while setting out how the programme will be achieved focusing on key issues and risks that will impact on the delivery of the Capital strategy and the governance framework required to ensure the Strategy is delivered.
- 3.2 The Strategy maintains a strong and current link to the Council’s priorities and to its key strategy documents, notably the Treasury Management Strategy, Asset Management Strategy, Property Investment Strategy, Medium Term Financial Plan and the Corporate Plan.

4.0 Alternative Options Considered

4.1 The Capital Strategy is a requirement of the CIPFA Prudential Code, no alternatives considered as this is a code requirement.

5.0 Reasons for Recommendations

5.1 Capital Strategy is a requirement of the CIPFA Prudential Code.

6.0 Future Work and Conclusions

6.1 The Capital Strategy will be monitored and reviewed annually.

7.0 Financial Implications

7.1 There are no direct financial implications arising from this report. The Capital Strategy provides a position statement with regards to capital expenditure and the resources available in terms of funding.

8.0 Social Value Considerations

8.1 This report notes the Capital Strategy of the Council. This is a requirement of the CIPFA Prudential Code – ESG requirements are included within the Code.

9.0 Legal Implications

9.1 The Council is required to have a Capital Strategy to meet the requirements of the Local Government Act 2003, Localism Act 2011, Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2020, the CIPFA Prudential Code, DLUHC Minimum Revenue Provision Guidance, the CIPFA Treasury Management Code and DLUHC Investment Guidance.

10.0 Risk & Opportunity Management Implications

10.1 The Council must have reviewed its Capital Strategy by 31st March 2024.

11.0 People Impact Assessment (PIA) and Safeguarding:

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

12.0 Community Safety Implications

12.1 None

13.0 Staffing and Trade Union Implications

13.1 None

Background Documents:

Local Government Act 2003
CIPFA Treasury Management Code
CIPFA Prudential Code
DLUHC MRP Guidance

Introduction

This capital strategy sets out how Gloucester City Council intend to spend capital to provide services and meet the strategic aims in the Council plan. This strategy gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services along with an overview of how associated risk is managed and the implications for future financial sustainability. It has been written in an accessible style to enhance members', residents and other stakeholders understanding of these areas.

Background

The Capital Strategy demonstrates that the authority takes capital investment decisions in line with service objectives and properly takes account of stewardship, value for money, prudence, sustainability and affordability. The Capital Strategy also sets out the long-term context in which capital expenditure and investment decisions are made and gives due consideration to both risk and reward and impact on the achievement of priority outcomes. Decisions around capital expenditure, investment and borrowing should align with the processes established for the setting and revising of the budget for the local authority.

The Capital Strategy should also be tailored to the authority's individual circumstances and should include capital expenditure, investments and liabilities and treasury management. For Gloucester, the Treasury Management Strategy drawn up in line with the Treasury Management Code will continue to be published as a separate document and this will remain separate to differentiate between the demand and assessment of capital expenditure and the management of the investment and borrowing portfolio.

CIPFA published the revised codes on Treasury Management and Prudential Code on 20th December 2021. Formal adoption is required from 2023/24 Financial Year. Both the Capital Strategy and Treasury Management Strategy are produced in accordance with the Prudential Code.

Policy Context

The Council plan 22-24 defines the Council's vision:

“Building a greener, fairer, better Gloucester”

The priorities to support this vision are:

1. Building greener, healthier, and more inclusive communities
2. Building a sustainable city of diverse culture and opportunity
3. Building a socially responsible and empowering council

The vision and priorities are underpinned by our core values.

For full details of the Council Plan see: [Council Plan](#)

The Capital Strategy is an important policy document in delivering the Council's Vision in terms of maintaining and extending the Council's asset base but needs to take a longer-term view to reflect the life cycle of capital assets. The life cycle of capital assets, often known as non-current assets, will range between 5-60 years or even longer if land is acquired. Decisions made now will affect residents, business and other stakeholders for many years to come.

Capital Expenditure and Financing

Capital expenditure is where the Council spends money on assets, such as property or vehicles, that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £6,000 are not capitalised and are charged to revenue in year.

- For details of the Council's policy on capitalisation, see: Statement of Accounts 2021/22 page 21, Accounting Policies point 19 - [Statement of Accounts](#)

In 2024/25, the Council is planning capital expenditure of £36.272 as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
General Fund services	30.118	45.894	36.272	33.607	6.182
TOTAL	30.118	45.894	36.272	33.607	6.182

The capital programme includes a variety of projects from large regeneration to smaller individual projects, the main capital projects are detailed below:

Kings Quarter – The Forum continues to progress; Council approved the project in January 2021. The project will see significant investment by the Council in both the physical, economic, and cultural redevelopment of this part of the city. The plans include retail, office, hotel and residential areas which will see this part of the City completely redeveloped. The required council investment will be £107m and will be a long-term investment of up to 50 years. Significant due diligence has been undertaken with financial, property and legal advisors to confirm the projects long term viability. The Whitefriars apartments were part of phase one of the project and were completed in 2023. All but one the apartments have been sold and residents are now living there.

In 2021 the Council was awarded £20m 'levelling up' funding from DLUHC which will support circa £200m of investment in the City. The funding will be used to deliver the

Forge Digital Innovation and Incubation Centre, providing 2,430 sqm of accommodation and support for high value added SME businesses. It will form part of the wider mixed-use Forum development which will provide a vibrant and active destination in an important gateway adjacent to the City Centre bus station and rail interchange, in the Kings Quarter area.

The fund will also support the redevelopment of the former Debenhams building via the University of Gloucester. The University will create a new City Campus for teaching, learning and community partnerships in the City Centre. The LUF bid will also enable an important public role in the UoG building by creating a drop in Well Being Centre, a new digitally enabled public library and information centre.

The Council continues to upgrade the Kings Walk site. New branding has been installed throughout and exciting new tenants such as 'Putt Putt Noodle' have been revealed as the centre continues to redevelop.

Work with partners is ongoing as part of the wider regeneration plans. Redevelopment of the Railway Station will ultimately see it link to the Transport Hub and City Centre supporting the Kings Quarter regeneration. The redevelop work is ongoing with the project funded via the LEP.

In late 2023 the council secured £11m of Levelling Up Round Three money for the redevelopment of the Greyfriars area of the city centre. This grant funding, supported by council funding, will ensure the redevelopment of the Eastgate Market and surrounding area.

Housing Projects – The Council has set aside £5m to support its temporary accommodation needs. The Council will invest in suitable housing provision which will reduce future demand for private housing provision to meet its statutory responsibilities.

Governance: The Major Projects Steering group and/or the Property Investment Board review significant projects for inclusion within the Council's capital programme. Projects are collated by finance who calculate the financing cost (which can be nil if the project is fully externally financed). The groups appraise all bids based on a comparison of service priorities against financing costs and makes recommendations for the capital programme. The final capital programme is then presented to Cabinet and Council in February each year.

The Major Projects Group oversees ongoing projects to insure successful delivery in accordance with approved plans.

The Property Investment Board is responsible for the investment strategy overseeing the performance of the non-operational and investment portfolio.

The Asset Management Steering Group provides strategic planning and overview of our operational assets.

- For full details of the Council's capital programme see: [Money Plan](#)

All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
External sources	1.081	0.482	6.355	1.250	2.697
Own resources	0.000	6.676	5.168	4.310	3.385
Debt	29.037	18.056	24.750	28.047	0.100
TOTAL	30.118	38.736	36.272	33.607	6.182

Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as minimum revenue provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. Planned MRP and use of capital receipts are as follows:

Table 3: Replacement of debt finance in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
Own resources	2.685	2.406	2.407	2.057	2.081

- The Council's full minimum revenue provision statement is available here: [Treasury Management Strategy - MRP](#)

The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR is expected to increase by £22.585m during 24/25. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
General Fund services	164.816	201.407	223.992	250.205	248.428
TOTAL CFR	164.816	201.407	223.992	250.205	248.428

Asset management: To ensure that capital assets continue to be of long-term use, the Council has an asset management strategy which is currently been updated to ensure it remains appropriate to manage our assets. . Gloucester City Council has a diverse estate from ancient monuments to commercial property. The asset management strategy details our approach to managing our diverse assets including our acquisitions and disposals, planned maintenance, governance and performance.

Asset disposals: When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2024/25. Repayments of capital grants, loans and investments also generate capital receipts. The Council plans to receive £2.668m of capital receipts in the coming financial year as follows:

Table 5: Capital receipts in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
Asset sales	0.000	5.676	2.668	2.310	2.385
Loans repaid	0.000	0.000	0.000	0.000	0.000
TOTAL	0.000	5.676	2.668	2.310	2.385

- The Council's Flexible Use of Capital Receipts Policy is available here: [Flexible Use of Capital Receipts Policy](#)

Treasury Management

Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

Borrowing strategy: The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between cheap short-term loans and long-term fixed rate loans where the future cost is known but higher.

Projected levels of the Council's total outstanding debt (which comprises borrowing, PFI liabilities, leases are shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions

	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
Debt (incl. PFI & leases)	153.847	190.438	213.023	239.236	237.459
Capital Financing Requirement	164.816	201.407	223.992	250.205	248.428

Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from table 6, the Council expects to comply with this in the medium term.

Affordable borrowing limit: The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt in £m

Authorised limit £m	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Debt	225	245	270	270
Other long term liabilities	35	35	35	35
Total	260	280	305	305
Operational boundary £m	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Debt	210	230	255	255
Other long term liabilities	30	30	30	30
Total	240	260	285	285

- Further details on borrowing are in pages 11 to 15 of the treasury management strategy Treasury Management Strategy

Investment strategy: Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

The Council’s policy on treasury investments is to prioritise security and liquidity over yield, that is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

- Further details on treasury investments are in pages 16 to 21 of the treasury management strategy

Governance: Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Head of Finance and Resources and staff, who must act in line with the treasury management strategy approved by Council. Half yearly reports on treasury management activity are presented to Audit and Governance Committee which is responsible for scrutinising treasury management decisions.

Investments for Service Purposes

The Council makes investments to assist local public services, including making loans to local service providers, businesses to promote economic growth, the Council's subsidiaries that provide services. In light of the public service objective, the Council is willing to take more risk than with treasury investments, however it still plans for such investments to generate a profit after all costs.

Governance: Decisions on service investments are made by the relevant service manager in consultation with the Head of Finance and Resources and must meet the criteria and limits laid down in the investment strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme.

Liabilities

In addition to debt of £190.438m detailed above, the Council is committed to making future payments to cover its pension fund deficit (valued at £45.689m). It has also set aside £1.6m to cover risks of provisions, this mainly relates to NNDR appeals, where the Council has estimated the costs arising from appeals by ratepayers. The Council did not have any contingent liabilities in 2022/23.

Governance: Decisions on incurring new discretionary liabilities are taken by service managers in consultation with head of Finance and Resources. The risk of liabilities crystallising and requiring payment is monitored by finance.

- Further details on provisions (page 50), liabilities and guarantees are on page 65 of the 2021/22 statement of accounts - [Statement of Accounts](#)

Revenue Budget Implications

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 9: Prudential Indicator: Ratio of financing costs to net revenue stream

%	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
	23.44%	21.06%	21.19%	19.88%	19.95%

- Further details on the revenue implications of capital expenditure are noted within the 2024/25 revenue budget - [Money Plan](#)

Sustainability: Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The Head of Finance and Resources is satisfied that the proposed capital programme is prudent, affordable and sustainable.

Knowledge and Skills

The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. For example, the Head of Finance and Resources is a qualified accountant with 20 years' experience, the Financial Services and Accountancy Managers are both qualified accountants with 25 and 10 years' experience. The Council pays for junior staff to study towards relevant professional qualifications including CIPFA, ACT (treasury) and CIMA.

Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Link Group as treasury management advisers, the Council employs property consultants on a case by case basis. This approach is more cost effective than employing such staff directly and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.



Meeting:	Cabinet Council	Date:	6 March 2024 21 March 2024
Subject:	Treasury Management Strategy 2024/25		
Report Of:	Cabinet Member for Performance and Resources		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	Yes
Contact Officer:	Richard Wintour, Accountancy Manager		
	Email:	Richard.wintour@gloucester.gov.uk	Tel: 396439
Appendices:	1. Treasury Management Strategy 2024/25		

FOR GENERAL RELEASE

1.0 Purpose of Report

1.1 To formally recommend that Council approves the attached Treasury Management Strategy, the prudential indicators and note the Treasury activities.

2.0 Recommendations

2.1 Cabinet is asked to **RECOMMEND** that the Treasury Management Strategy be approved.

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

- (1) The Treasury Management Strategy at Appendix 1 be approved;
- (2) The authorised borrowing limit be approved at:-
 - 2024/25 £280m
 - 2025/26 £305m
 - 2026/27 £305m
- (3) The prudential indicators set out in section two of the strategy be approved.

3.0 Background and Key Issues

3.1 Recent property acquisitions within Gloucester and continued regeneration of the City, has meant that the Councils borrowing requirements have increased. These long term investments and projects will significantly change the treasury position of the Council over the life of the investments, creating investable cashflow streams.

- 3.2 The 2024/25 Treasury Management Strategy recommends to continue operating within an under-borrowing position. This position reflects that the Council uses internal resources, such as reserves, to fund the borrowing need rather than invest those funds for a return. This strategy is sensible, at this point in time, for two reasons. Firstly, the lost interest on those funds is significantly less than the costs of borrowing money for the capital programme. In addition, using the resources to reduce debt the Council will reduce exposure to investment counterparty risk.
- 3.3 There will be cash flow balances that will be invested for short periods within the year. Section 4 of the strategy outlines the Annual Investment Strategy - in particular it outlines the creditworthiness policy through the use of credit ratings.
- 3.4 The borrowing strategy is to utilise investments to reduce short term borrowing. Once investments have been applied it is anticipated that the majority of new debt will be short term as market rates are more attractive than long term borrowing. There will be need for long term borrowing to support the current capital programme, such borrowing will also mitigate the risk presented by having all borrowing on short-term deals.
- 3.5 The strategy allows flexibility for either debt rescheduling or new long term fixed rate borrowing while allowing the Council to benefit from lower interest rates on temporary borrowing at the current time.
- 3.6 The strategy also includes the minimum revenue provision (MRP) policy statement. This policy continues with the practice approved last year. MRP is the revenue charge to reduce debt by placing a charge on the General Fund each year. The preferred option is to provide for the borrowing need created over the approximate life of the asset purchased. This is achieved with an annuity calculation which provides a consistent overall annual borrowing charge with the level of principal (MRP) increasing each year, much like a repayment mortgage.

4.0 Alternative Options Considered

- 4.1 The following option has been considered:

There remains the option to replace existing short term borrowing with longer term options, this is not as attractive due to the availability of short term funding which remains below rates available for longer term funds.

5.0 Reasons for Recommendations

- 5.1 The Council is required to approve a Treasury Management Strategy before the start of each financial year to meet the requirements of the Local Government Act 2003. The Treasury and Investment Strategies recommended provide the best platform for financing the long-term capital programme and managing daily cash flow whilst protecting Council funds.

6.0 Future Work and Conclusions

- 6.1 The Treasury Management Strategy provides a logical basis to fund the Council's capital financing requirement and long-term Capital Programme. The Council will continue to monitor the strategy and is prepared to adapt this strategy if there is changes within the markets.

7.0 Financial Implications

- 7.1 The expenditure and income arising from treasury management activities are included within the Council Money Plan.

8.0 Social Value Considerations

- 8.1 This report notes the Treasury Strategy of the Council. Environmental Social and Governance requirements are covered within the CIPFA Prudential Code.

9.0 Legal Implications

- 9.1 The Council is required to approve a Treasury Management Strategy before the start of each financial year to meet the requirements of the Local Government Act 2003, the Chartered Institute of Public Finance and Accountancy's (CIPFA) Prudential Code for Capital Finance in Local Authorities, the CIPFA Treasury Management In the Public Services: Code of Practice and Cross-sectoral Guidance Notes; DLUHC Capital Finance: Guidance on Minimum Revenue Provision.
- 9.2 The Treasury Management Strategy attached at Appendix 1 meets these legislative and guidance requirements.

10.0 Risk & Opportunity Management Implications

- 10.1 There is a risk that short term and long term interest rates could increase and this will be monitored both in-house and by the Council Treasury Management Advisor, Link Asset Services. In this event the risk will be managed through the opportunities either to reschedule debt or new long term fixed rate borrowing in place of short term borrowing.
- 10.2 The risk of deposits not being returned by the counterparty is minimised by only investing short term cash flow monies with counterparties on the approved lending list. All counterparties on this list meet minimum credit rating criteria, ensuring the risk is kept extremely low although not eliminated.

11.0 People Impact Assessment (PIA):

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

12.0 Other Corporate Implications

Community Safety

12.1 None

Sustainability

12.2 None

Staffing & Trade Union

12.3 None

Background Documents:

Local Government Act 2003
CIPFA Treasury Management Code
CIPFA Prudential Code
DLUHC MRP Guidance

Treasury Management Strategy 2024/25

1. Introduction

2021 revised CIPFA Treasury Management Code and Prudential Code – changes which will impact on future TMSS/AIS reports and the risk management framework

CIPFA published the revised Codes on 20th December 2021 and stated that revisions need to be included in the reporting framework from the 2023/24 financial year. The Council, therefore, has to have regard to these Codes of Practice when it prepares the Treasury Management Strategy Statement and Annual Investment Strategy, and also related reports during the financial year, which are taken to Full Council for approval.

The revised Treasury Management Code required all investments and investment income to be attributed to one of the following three purposes: -

Treasury management

Arising from the organisation's cash flows or treasury risk management activity, this type of investment represents balances which are only held until the cash is required for use. Treasury investments may also arise from other treasury risk management activity which seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.

Service delivery

Investments held primarily and directly for the delivery of public services including housing, regeneration and local infrastructure. Returns on this category of investment which are funded by borrowing are permitted only in cases where the income is "either related to the financial viability of the project in question or otherwise incidental to the primary purpose".

Commercial return

Investments held primarily for financial return with no treasury management or direct service provision purpose. Risks on such investments should be proportionate to an authority's financial capacity – i.e., that 'plausible losses' could be absorbed in budgets or reserves without unmanageable detriment to local services. An authority must not borrow to invest primarily for financial return.

The revised Treasury Management Code requires an authority to implement the following:

-

- **Adopt a liability benchmark treasury indicator** to support the financing risk management of the capital financing requirement; this is to be shown in chart form for a minimum of ten years, with material differences between the liability benchmark and actual loans to be explained;
- **Long-term treasury investments**, (including pooled funds), are to be classed as commercial investments unless justified by a cash flow business case;
- **Pooled funds** are to be included in the indicator for principal sums maturing in years beyond the initial budget year;
- Amendment to the **knowledge and skills register** for officers and members involved in the treasury management function - to be proportionate to the size and complexity of the treasury management conducted by each authority;

- **Reporting to members is to be done quarterly.** Specifically, the Chief Finance Officer (CFO) is required to establish procedures to monitor and report performance against all forward-looking prudential indicators at least quarterly. The CFO is expected to establish a measurement and reporting process that highlights significant actual or forecast deviations from the approved indicators. However, monitoring of prudential indicators, including forecast debt and investments, is not required to be taken to Full Council and should be reported as part of the authority's integrated revenue, capital and balance sheet monitoring;
- **Environmental, social and governance (ESG)** issues to be addressed within an authority's treasury management policies and practices (TMP1).

The main requirements of the Prudential Code relating to service and commercial investments are: -

- The risks associated with service and commercial investments should be proportionate to their financial capacity – i.e. that plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services;
- An authority must not borrow to invest for the primary purpose of commercial return;
- It is not prudent for local authorities to make any investment or spending decision that will increase the CFR, and so may lead to new borrowing, unless directly and primarily related to the functions of the authority, and where any commercial returns are either related to the financial viability of the project in question or otherwise incidental to the primary purpose;
- An annual review should be conducted to evaluate whether commercial investments should be sold to release funds to finance new capital expenditure or refinance maturing debt;
- A prudential indicator is required for the net income from commercial and service investments as a proportion of the net revenue stream;
- Create new Investment Management Practices to manage risks associated with non-treasury investments, (similar to the current Treasury Management Practices).

An authority's Capital Strategy or Annual Investment Strategy should include: -

- The authority's approach to investments for service or commercial purposes (together referred to as non-treasury investments), including defining the authority's objectives, risk appetite and risk management in respect of these investments, and processes ensuring effective due diligence;
- An assessment of affordability, prudence and proportionality in respect of the authority's overall financial capacity (i.e., whether plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services);
- Details of financial and other risks of undertaking investments for service or commercial purposes and how these are managed;
- Limits on total investments for service purposes and for commercial purposes respectively (consistent with any limits required by other statutory guidance on investments);
- Requirements for independent and expert advice and scrutiny arrangements (while business cases may provide some of this material, the information contained in them will need to be periodically re-evaluated to inform the authority's overall strategy);

- State compliance with paragraph 51 of the Prudential Code in relation to investments for commercial purposes, in particular the requirement that an authority must not borrow to invest primarily for financial return.

As this TMSS and AIS deals solely with treasury management investments, the categories of service delivery and commercial investments should be addressed as part of the Capital Strategy report.

However, as investments in commercial property have implications for cash balances managed by the treasury team, it will be for each authority to determine whether to add a high level summary of the impact that commercial investments have, or may have, if it is planned to liquidate such investments within the three year time horizon of this report, (or a longer time horizon if that is felt appropriate).

1.1 Background

The Authority is required to operate a balanced revenue budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low-risk counterparties or instruments commensurate with the Authority's low risk appetite, providing adequate liquidity initially before considering investment return.

The second main function of the treasury management service is the funding of the Authority's capital plans. These capital plans provide a guide to the borrowing need of the Authority, essentially the longer-term cash flow planning, to ensure that it can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet risk or cost objectives.

The contribution the treasury management function makes to the Authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

CIPFA defines treasury management as:

“The management of the local authority's borrowing, investments and cash flows, including its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day-to-day treasury management activities.

1.2 Reporting requirements

1.2.1 Capital Strategy

The CIPFA 2021 Prudential and Treasury Management Codes require all local authorities to prepare a Capital Strategy report which will provide the following: -

- a high-level long-term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of the strategy is to ensure that all the Authority's elected members fully understand the overall long-term policy objectives and resulting Capital Strategy requirements, governance procedures and risk appetite.

1.2.2 Treasury Management reporting

The Council is currently required to receive and approve, as a minimum, three main treasury reports each year, which incorporate a variety of policies, estimates and actuals.

Prudential and treasury indicators and treasury strategy (this report) - The first, and most important report is forward looking and covers:

- 1 the capital plans (including prudential indicators);
- 2 a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- 3 the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- 4 an annual investment strategy (the parameters on how investments are to be managed).

A mid-year treasury management report – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision.

An annual treasury report – This is a backward-looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

Scrutiny

The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken at Gloucester by the Audit and Governance Committee.

Quarterly reports – In addition to the three major reports detailed above, from 2023/24 quarterly reporting (end of June/end of December) is also required. However, these additional reports do not have to be reported to Full Council/Board but do require to be adequately scrutinised. This role is undertaken by the Audit and Governance Committee.

1.3 Treasury Management Strategy for 2024/25

The strategy for 2024/25 covers two main areas:

Capital issues

1. the capital plans and the associated prudential indicators;
2. the minimum revenue provision (MRP) policy.

Treasury management issues

1. the current treasury position;
2. treasury indicators which limit the treasury risk and activities of the Council;
3. prospects for interest rates;
4. the borrowing strategy;
5. policy on borrowing in advance of need;
6. debt rescheduling;
7. the investment strategy;
8. creditworthiness policy; and
9. the policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003, DLUHC Investment Guidance, DLUHC MRP Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management.

1.4 Training

The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny.

Furthermore, pages 47 and 48 of the CIPFA Code state that they expect “all organisations to have a formal and comprehensive knowledge and skills or training policy for the effective acquisition and retention of treasury management knowledge and skills for those responsible for management, delivery, governance and decision making.

Finance training for members, including Treasury Management, featured in the member development programme during 2023/24 and further training will be arranged as required

The training needs of Treasury Management officers are periodically reviewed and staff have attended training and seminars during 2023/24 and will continue to do so in the upcoming year.

1.5 Treasury management consultants

The Council uses Link Group, Link Treasury Services Limited as its external treasury management advisors.

The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.

It also recognises that there is value in employing external providers of treasury management services to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

The scope of investments within the Council's operations now includes both conventional treasury investments, (the placing of residual cash from the Council's functions), and more commercial type investments, such as investment properties. The commercial type investments require specialist advisers, and the Council uses such advisors on a case by case basis in relation to this activity.

2 THE CAPITAL PRUDENTIAL INDICATORS 2024/25 – 2026/27

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

2.1 Capital expenditure

This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts.

Capital expenditure £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Policy & Resources	0.810	1.179	4.550	4.800	1.175
Place	26.365	42.216	23.200	25.200	1.400
Communities	2.685	1.654	6.972	1.557	1.557
Tech and Corp	0.258	0.758	0.050	0.050	0.050
Culture & Trading	0.000	0.087	1.500	2.000	2.000
Total	30.118	45.894	36.272	33.607	6.182

The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a borrowing need.

Financing of capital expenditure £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Capital receipts	0.000	5.676	2.668	2.310	2.385
Capital grants	1.081	0.482	6.355	1.250	2.697
Capital Reserves	0.000	0.000	0.000	0.000	0.000
Revenue	0.000	1.000	2.500	2.000	1.000
Net financing need for the year	29.037	38.736	24.750	28.047	0.100

2.2 The Council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility by the PFI, PPP lease provider and so the Council is not required to separately borrow for these schemes.

The Council is asked to approve the CFR projections below:

£m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Capital Financing Requirement:-					
Total CFR	164.816	201.407	223.992	250.205	248.428
Movement in CFR	26.631	36.591	22.585	26.213	(1.777)

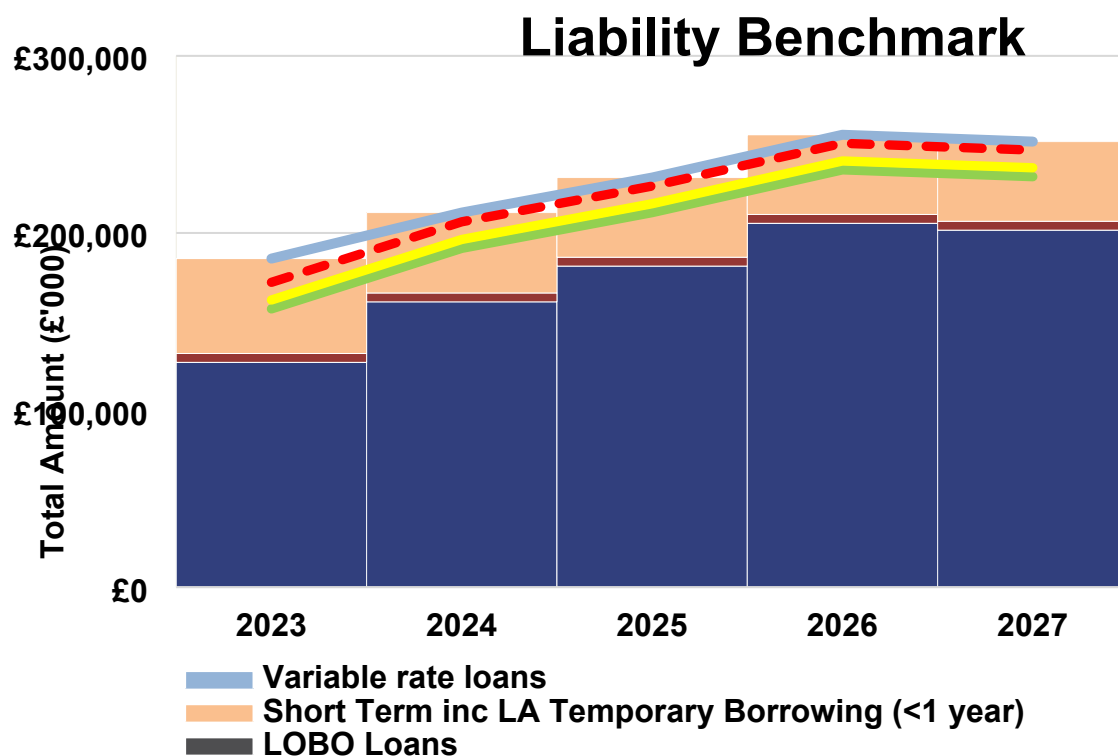
Movement in CFR represented by					
Net financing need for the year (above)	29.037	38.736	24.750	28.047	0.100
Less MRP/VRP and other financing movements	(2.685)	(2.406)	(2.407)	(2.057)	(2.081)
Kings Walk	0.279	0.261	0.242	0.223	0.204
Movement in CFR	26.631	36.591	22.585	26.213	(1.777)

2.3 Liability Benchmark

The Authority is required to estimate and measure the Liability Benchmark (LB) for the forthcoming financial year and the following two financial years, as a minimum.

There are four components to the LB: -

1. **Existing loan debt outstanding:** the Authority's existing loans that are still outstanding in future years.
2. **Loans CFR:** this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing and planned MRP.
3. **Net loans requirement:** this will show the Authority's gross loan debt less treasury management investments at the last financial year-end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cash flows forecast. .
4. **Liability benchmark (or gross loans requirement):** this equals net loans requirement plus short-term liquidity allowance.



2.4 Core funds and expected investment balances

The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances for each resource and anticipated day-to-day cash flow balances.

Year End Resources £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Fund balances / reserves	1.127	1.127	1.023	1.263	1.395
Capital receipts	0.366	0	1.5	2.5	0
Provisions	1.5	1.5	1.5	1.5	1.5
Other (Grants)	2	2	2	2	2
Total core funds	4.993	4.627	6.023	7.263	4.895
Working capital*	10	10	10	10	10
Under/over borrowing**	(10.969)	(10.969)	(10.969)	(10.969)	(10.969)
Expected investments	4.024	3.658	5.054	6.294	3.926

*Working capital balances shown are estimated year-end; these will vary in year

2.5 Minimum revenue provision (MRP) policy statement

The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).

DLUHC regulations have been issued which require the full Council to approve **an MRP Statement** in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement):

For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be:

1. **Existing practice** - MRP will follow the existing practice outlined in former DLUHC regulations (option 1) This option provides for an approximate 4% reduction in the borrowing need (CFR) each year.

From 1 April 2008 for all unsupported borrowing (including finance leases) the MRP policy will be

2. **Asset life method** – MRP will be based on the estimated life of the assets, in accordance with the regulations

These options provide for a reduction in the borrowing need over approximately the asset's life.

Capital expenditure incurred during 2023/24 will not be subject to an MRP charge until 2024/25, or in the year after the asset becomes operational.

The Council will apply the asset life method for any expenditure capitalised under a Capitalisation Direction.

Repayments included in finance leases and loan principal are applied as MRP.

For capital expenditure on loans to third parties where the principal element of the loan is being repaid in annual instalments, the capital receipts arising from the principal loan repayments will be used to reduce the CFR instead of MRP.

MRP Overpayments - Under the MRP guidance, any charges made in excess of the statutory MRP can be made, known as voluntary revenue provision (VRP).

VRP can be reclaimed in later years if deemed necessary or prudent. In order for these amounts to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year.

Cumulative VRP overpayments made to date are £2.6m.

3 BORROWING

The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The Treasury Management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

3.1 Current portfolio position

The overall treasury management portfolio as at 31 March 2023 and for the position as at 01 January 2024 are shown below for both borrowing and investments.

TREASURY PORTFOLIO				
	actual 31.3.23	actual 31.3.23	current 01.01.24	current 01.01.24
	£000	%	£000	%
Treasury investments				
Banks	7,162	35%	7,623	33%
Building societies - unrated	0	0%	0	0%
Building societies - rated	0	0%	0	0%
Local authorities	0	0%	0	0%
DMADF (H.M.Treasury)	0	0%	0	0%
Money Market Funds	3,975	19%	5,975	26%
Certificates of Deposit	0	0%	0	0%
Total managed in house	11,137	55%	13,598	60%
Bond Funds	0	0%	0	0%
Property Funds	9,265	45%	9,167	40%
Total managed externally	9,265	45%	9,167	40%
Total treasury investments	20,402	100%	22,765	100%
Treasury external borrowing				
Local Authorities	51,947	34%	73,600	42%
PWLB	96,621	63%	96,825	55%
LOBOs	5,000	3%	5,000	3%
Total external borrowing	153,568	100%	175,425	100%
Net treasury investments / (borrowing)	-133,166	0	-152,660	0

The Council's treasury portfolio position at 31 March 2023 with forward projections, is summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

£m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
External Debt					
Debt at 1 April	106.98	131.816	168.146	190.489	216.479
Expected change in Debt	24.836	36.330	22.343	25.990	-1.981
Other long-term liabilities (OLTL)	21.752	22.031	22.292	22.534	22.757
Expected change in OLTL	0.279	0.261	0.242	0.223	0.204
Actual gross debt at 31 March	153.847	190.438	213.023	239.236	237.459
LT Debtors					
<i>Revised gross debt</i>					
The Capital Financing Requirement	164.816	201.407	223.992	250.205	248.428
Under / (over) borrowing	10.969	10.969	10.969	10.969	10.969

Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2024/25 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.

The Director of Policy and Resources reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

3.2 Treasury Indicators: limits to borrowing activity

The operational boundary. This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

Operational boundary £m	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Debt	210	230	255	255
Other long term liabilities	30	30	30	30
Total	240	260	285	285

The authorised limit for external debt. A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

(1) This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

(2) The Council is asked to approve the following authorised limit:

Authorised limit £m	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Debt	225	245	270	270
Other long term liabilities	35	35	35	35
Total	260	280	305	305

3.3 Prospects for interest rates

The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. Link provided the following forecasts on 7th November 2023. These are forecasts for certainty rates, gilt yields plus 80 bps:

Link Group Interest Rate View	07.11.23												
	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26
BANK RATE	5.25	5.25	5.25	5.00	4.50	4.00	3.50	3.25	3.00	3.00	3.00	3.00	3.00
3 month ave earnings	5.30	5.30	5.30	5.00	4.50	4.00	3.50	3.30	3.00	3.00	3.00	3.00	3.00
6 month ave earnings	5.60	5.50	5.40	5.10	4.60	4.10	3.60	3.40	3.10	3.10	3.10	3.10	3.10
12 month ave earnings	5.80	5.70	5.50	5.20	4.70	4.20	3.70	3.50	3.30	3.30	3.30	3.30	3.30
5 yr PWLB	5.00	4.90	4.80	4.70	4.40	4.20	4.00	3.80	3.70	3.60	3.50	3.50	3.50
10 yr PWLB	5.10	5.00	4.80	4.70	4.40	4.20	4.00	3.80	3.70	3.70	3.60	3.60	3.50
25 yr PWLB	5.50	5.30	5.10	4.90	4.70	4.50	4.30	4.20	4.10	4.10	4.00	4.00	4.00
50 yr PWLB	5.30	5.10	4.90	4.70	4.50	4.30	4.10	4.00	3.90	3.90	3.80	3.80	3.80

Additional notes by Link on this forecast table: -

- Our central forecast for interest rates was previously updated on 7 November and reflected a view that the MPC would be keen to further demonstrate its anti-inflation credentials by keeping Bank Rate at 5.25% until at least H2 2024. We expect rate cuts

to start when both the CPI inflation and wage/employment data are supportive of such a move, and when there is a likelihood of the overall economy enduring at least a slowdown or mild recession over the coming months (although most recent GDP releases have surprised with their on-going robustness).

- Naturally, timing on this matter will remain one of fine judgment: cut too soon, and inflationary pressures may well build up further; cut too late and any downturn or recession may be prolonged.
- In the upcoming months, our forecasts will be guided not only by economic data releases and clarifications from the MPC over its monetary policies and the Government over its fiscal policies, but also international factors such as policy development in the US and Europe, the provision of fresh support packages to support the faltering recovery in China as well as the on-going conflict between Russia and Ukraine, and Gaza and Israel.

PWLB RATES

- The short and medium part of the gilt curve has rallied since the start of November as markets price in a quicker reduction in Bank Rate through 2024 and 2025 than held sway back then. This reflects market confidence in inflation falling back in a similar manner to that already seen in the US and the Euro-zone. At the time of writing there is c70 basis points difference between the 5 and 50 year parts of the curve.

The balance of risks to the UK economy: -

- The overall balance of risks to economic growth in the UK is even.

Downside risks to current forecasts for UK gilt yields and PWLB rates include: -

- **Labour and supply shortages** prove more enduring and disruptive and depress economic activity (accepting that in the near-term this is also an upside risk to inflation and, thus, could keep gilt yields high for longer).
- **The Bank of England** has increased Bank Rate too fast and too far over recent months, and subsequently brings about a deeper and longer UK recession than we currently anticipate.
- **Geopolitical risks**, for example in Ukraine/Russia, the Middle East, China/Taiwan/US, Iran and North Korea, which could lead to increasing safe-haven flows.

Upside risks to current forecasts for UK gilt yields and PWLB rates: -

- Despite the tightening in Bank Rate to 5.25%, the **Bank of England allows inflationary pressures to remain elevated** for a long period within the UK economy, which then necessitates Bank Rate staying higher for longer than we currently project.
- **The pound weakens** because of a lack of confidence in the UK Government's pre-election fiscal policies, which may prove inflationary, resulting in investors pricing in a risk premium for holding UK sovereign debt.
- Projected **gilt issuance, inclusive of natural maturities and QT**, could be too much for the markets to comfortably digest without higher yields compensating.

Borrowing advice: Our long-term (beyond 10 years) forecast for Bank Rate remains at 3% and reflects Capital Economics' research that suggests AI and general improvements in

productivity will be supportive of a higher neutral interest rate. As all PWLB certainty rates are currently significantly above this level, borrowing strategies will need to be reviewed in that context. Overall, better value can be obtained at the shorter end of the curve and short-dated fixed LA to LA monies should be considered. Temporary borrowing rates will remain elevated for some time to come but may prove the best option whilst the market continues to factor in Bank Rate reductions for 2024 and later.

Temporary borrowing rates are likely, however, to remain near Bank Rate and may also prove attractive whilst the market waits for inflation, and therein gilt yields, to drop back later in 2023.

3.4 Borrowing strategy

The Authority is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Authority's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as medium and longer dated borrowing rates are expected to fall from their current levels once prevailing inflation concerns are addressed by tighter near-term monetary policy. That is, Bank Rate remains elevated through to the second half of 2024.

Against this background and the risks within the economic forecast, caution will be adopted with the 2024/25 treasury operations. The Director of Finance will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- *if it was felt that there was a significant risk of a sharp FALL in borrowing rates, then borrowing will be postponed.*
- *if it was felt that there was a significant risk of a much sharper RISE in borrowing rates than that currently forecast, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.*

Any decisions will be reported to the appropriate decision-making body at the next available opportunity.

3.5 Policy on borrowing in advance of need

The Authority will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and will be considered carefully to ensure that value for money can be demonstrated and that the Authority can ensure the security of such funds.

Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

3.6 Rescheduling

Rescheduling of current borrowing in our debt portfolio is unlikely to occur as there is still a very large difference between premature redemption rates and new borrowing rates.

All rescheduling will be reported to Cabinet at the earliest meeting following its action. The Council has recently taken long term loans and there is no current rescheduling planned.

3.7 New financial institutions as a source of borrowing and / or types of borrowing

Currently the PWLB Certainty Rate is set at gilts + 80 basis points for both HRA and non-HRA borrowing. However, consideration may still need to be given to sourcing funding from the following sources for the following reasons:

1. Local authorities (primarily shorter dated maturities out to 3 years or so – still cheaper than the Certainty Rate).
2. Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid a “cost of carry” or to achieve refinancing certainty over the next few years).

Our advisors will keep us informed as to the relative merits of each of these alternative funding sources.

3.8 Approved Sources of Long and Short term Borrowing

On Balance Sheet	Fixed	Variable
PWLB	●	●
Municipal bond agency	●	●
Local authorities	●	●
Banks	●	●
Pension funds	●	●
Insurance companies	●	●
UK Infrastructure Bank	●	●
Market (long-term)	●	●
Market (temporary)	●	●
Market (LOBOs)	●	●
Stock issues	●	●
Local temporary	●	●
Local Bonds	●	
Local authority bills	●	●
Overdraft		●
Negotiable Bonds	●	●
Internal (capital receipts & revenue balances)	●	●
Commercial Paper	●	
Medium Term Notes	●	
Finance leases	●	●

4 ANNUAL INVESTMENT STRATEGY

4.1 Investment policy

The Department of Levelling Up, Housing and Communities (DLUHC - this was formerly the Ministry of Housing, Communities and Local Government (MHCLG)) and CIPFA have extended the meaning of 'investments' to include both financial and non-financial investments. This report deals solely with treasury (financial) investments, (as managed by the Treasury Management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy, (a separate report).

The Council's investment policy has regard to the following: -

1. DLUHC's Guidance on Local Government Investments ("the Guidance")
2. CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ("the Code")
3. CIPFA Treasury Management Guidance Notes 2021

The Council's investment priorities will be security first, portfolio liquidity second and then yield, (return). The Council will aim to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and with the Council's risk appetite.

The above guidance from the DLUHC and CIPFA place a high priority on the management of risk. This Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means: -

1. Minimum acceptable **credit criteria** are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
2. **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as "**credit default swaps**" and overlay that information on top of the credit ratings.
3. **Other information sources** used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
4. This Council has defined the list of **types of investment instruments** that the Treasury Management team are authorised to use. There are two lists in appendix 5.4 under the categories of 'specified' and 'non-specified' investments.
 1. **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year.
 2. **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.

5. **Lending limits**, (amounts and maturity), for each counterparty will be set through applying the matrix table in paragraph 4.2.
6. **Transaction limits** are set for each type of investment in 4.2.
7. This Council will set a limit for the amount of its investments which are invested for **longer than 365 days**, (see paragraph 4.4).
8. Investments will only be placed with counterparties from countries with a specified minimum **sovereign rating**, (see paragraph 4.3).
9. This Council has engaged **external consultants**, (see paragraph 1.5), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this Council in the context of the expected level of cash balances and need for liquidity throughout the year.
10. All investments will be denominated in **sterling**.
11. As a result of the change in accounting standards for 2022/23 under IFRS 9, the Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the MHCLG, concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31.3.23. At the current juncture it has not been determined whether a further extension to the over-ride will be agreed by Government.

However, the Council will also pursue **value for money** in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance, (see paragraph 4.5). Regular monitoring of investment performance will be carried out during the year.

Changes in risk management policy from last year.

The above criteria are unchanged from last year

4.2 Creditworthiness policy

The Council applies the creditworthiness service provided by the Link Group. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard & Poor's. The credit ratings of counterparties are supplemented with the following overlays: -

1. "watches" and "outlooks" from credit rating agencies;
2. CDS spreads that may give early warning of changes in credit ratings;
3. sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, and any assigned Watches and Outlooks, in a weighted scoring system which is then combined with an overlay of CDS spreads. The end-product of this is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Authority to determine the suggested duration for investments. The Authority will, therefore, use counterparties within the following durational bands.

- Yellow 5 years *
- Dark pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.25
- Light pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.5
- Purple 2 years
- Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
- Orange 1 year
- Red 6 months
- Green 100 days
- No colour not to be used

The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically, the minimum credit ratings criteria the Authority uses will be a short-term rating (Fitch or equivalents) of F1 and a long-term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored daily. The Authority is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the Authority's minimum criteria, its further use as a new investment will be withdrawn immediately.
- in addition to the use of credit ratings the Authority will be advised of information in movements in Credit Default Swap spreads against the iTraxx European Senior Financials benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link. Extreme market movements may result in downgrade of an institution or removal from the Authority's lending list.

Sole reliance will not be placed on the use of this external service. In addition, the Council will also use market data and market information, as well as information on any external support for banks to help support its decision-making process.

Y	Pi1	Pi2	P	B	O	R	G	N/C
1	1.25	1.5	2	3	4	5	6	7
Up to 5yrs	Up to 5yrs	Up to 5yrs	Up to 2yrs	Up to 1yr	Up to 1yr	Up to 6mths	Up to 100days	No Colour

	Colour (and long term rating where applicable)	Money and/or % Limit	Time Limit
Banks *	yellow	£10m	5yrs
Banks	purple	£10m	2 yrs
Banks	orange	£10m	1 yr

Banks – part nationalised	blue	£10m	1 yr
Banks	red	£10m	6 mths
Banks	green	£10m	100 days
Banks	No colour	Not to be used	
Limit 3 category – Council’s banker (where “No Colour”)	Barclays Bank	100 %	1 day
Other institutions limit	A-	£10m	6 months
DMADF	UK sovereign rating	unlimited	6 months
Local authorities	n/a	100%	1yrs
	Fund rating	Money and/or % Limit	Time Limit
Money Market Funds CNAV	AAA	£10m	liquid
Money Market Funds LVNAV	AAA	£10m	liquid
Money Market Funds VNAV	AAA	£10m	liquid
Ultra-Short Dated Bond Funds with a credit score of 1.25	Dark pink / AAA	£10m	liquid
Ultra-Short Dated Bond Funds with a credit score of 1.50	Light pink / AAA	£10m	liquid

Creditworthiness.

Significant levels of downgrades to Short and Long-Term credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks. Nonetheless, when setting minimum sovereign debt ratings, the Council will not set a minimum rating for the UK.

CDS prices

Although bank CDS prices, (these are market indicators of credit risk), spiked upwards during the days of the Truss/Kwarteng government in the autumn of 2022, they have returned to more average levels since then. However, sentiment can easily shift, so it will remain important to undertake continual monitoring of all aspects of risk and return in the current circumstances. Link monitor CDS prices as part of their creditworthiness service to local authorities and the Authority has access to this information via its Link-provided Passport portal.

4.3 Limits

County limits

The Council has determined that it will only use approved counterparties from countries with a minimum sovereign credit rating of AA- from Fitch or equivalent. The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix 6.4. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

4.4 Investment strategy

In-house funds. Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e., rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. The current shape of the yield curve suggests that is the case at present, but there is the prospect of Bank Rate having peaked in the second half of 2023 and possibly reducing as early as the second half of 2024 so an agile investment strategy would be appropriate to optimise returns.

Accordingly, while most cash balances are required in order to manage the ups and downs of cash flow where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer-term investments will be carefully assessed.

Investment returns expectations.

The current forecast shown in paragraph 3.3, includes a forecast for Bank Rate to have peaked at 5.25%.

The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows: -

Average earnings in each year	
2023/24 (residual)	5.25%
2024/25	4.55%
2025/26	3.10%
2026/27	3.00%
2027/28	3.25%
Years 6 to 10	3.25%
Years 10+	3.25%

As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

Investment treasury indicator and limit - total principal funds invested for greater than 365 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

The Council is asked to approve the following treasury indicator and limit:

Upper limit for principal sums invested for longer than 365 days			
£m	2024/25	2025/26	2026/27
Principal sums invested over 365 days	£30m	£30m	£30m

4.5 Investment risk benchmarking

These benchmarks are simple guides to maximum risk, so they may be breached from time to time, depending on movements in interest rates and counterparty criteria. The purpose of the benchmark is that officers will monitor the current and trend position and amend the operational strategy to manage risk as conditions change. Any breach of the benchmarks will be reported, with supporting reasons in the mid-year or Annual Report.

Security - The Council's maximum security risk benchmark for the current portfolio, when compared to these historic default tables, is:

1. 5% historic risk of default when compared to the whole portfolio.

Liquidity – in respect of this area the Council seeks to maintain:

1. Bank overdraft - £0m
2. Liquid short term deposits of at least £5m available with a week's notice.
3. Weighted average life benchmark is expected to be 25 years, with a maximum of 40 years.

Yield - local measures of yield benchmarks are:

4. Investments – internal returns above the 7 day SONIA rate
5. Investments – external fund managers - returns 110% above 7 day compounded SONIA.

And in addition that the security benchmark for each individual year is:

	1 year	2 years	3 years	4 years	5 years
Maximum	5%	5%	5%	5%	5%

Note: This benchmark is an average risk of default measure, and would not constitute an expectation of loss against a particular investment.

4.6 End of year investment report

At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

5.1 THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2024/25 – 2026/27

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

5.1.1 Capital expenditure

Capital expenditure £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Policy & Resources	0.810	1.179	4.550	4.800	1.175
Place	26.365	42.216	23.200	25.200	1.400
Communities	2.685	1.654	6.972	1.557	1.557
Tech and Corp	0.258	0.758	0.050	0.050	0.050
Culture & Trading	0.000	0.087	1.500	2.000	2.000
Total	30.118	45.894	36.272	33.607	6.182

5.1.2 Affordability prudential indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators:

1. Ratio of financing costs to net revenue stream

This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

%	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
	23.44%	21.06%	21.19%	19.88%	19.95%

The estimates of financing costs include current commitments and the proposals in this budget report.

The current figures are largely the result of the Kings Walk and St Oswalds investments. Rental payments received from retailers within Kings Walk and St Oswalds will cover these financing costs.

5.1.3 Maturity structure of borrowing

Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

The Council is asked to approve the following treasury indicators and limits:

Maturity structure of fixed and variable interest rate borrowing 2024/25		
	Lower	Upper
Under 12 months	0%	100%
12 months to 2 years	0%	100%
2 years to 5 years	0%	100%
5 years to 10 years	0%	100%
10 years and above	0%	100%

5.1.4. Control of interest rate exposure

Please see paragraphs 3.3, 3.4 and 4.4.

6 APPENDICES

1. Interest rate forecasts
2. Economic background
3. Treasury management practice 1 – credit and counterparty risk management (option 1)
4. Approved countries for investments
5. Treasury management scheme of delegation
6. The treasury management role of the section 151 officer

6.1 INTEREST RATE FORECASTS 2022 – 2025

Link Group Interest Rate View	07.11.23												
	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26
BANK RATE	5.25	5.25	5.25	5.00	4.50	4.00	3.50	3.25	3.00	3.00	3.00	3.00	3.00
3 month ave earnings	5.30	5.30	5.30	5.00	4.50	4.00	3.50	3.30	3.00	3.00	3.00	3.00	3.00
6 month ave earnings	5.60	5.50	5.40	5.10	4.60	4.10	3.60	3.40	3.10	3.10	3.10	3.10	3.10
12 month ave earnings	5.80	5.70	5.50	5.20	4.70	4.20	3.70	3.50	3.30	3.30	3.30	3.30	3.30
5 yr PWLB	5.00	4.90	4.80	4.70	4.40	4.20	4.00	3.80	3.70	3.60	3.50	3.50	3.50
10 yr PWLB	5.10	5.00	4.80	4.70	4.40	4.20	4.00	3.80	3.70	3.70	3.60	3.60	3.50
25 yr PWLB	5.50	5.30	5.10	4.90	4.70	4.50	4.30	4.20	4.10	4.10	4.00	4.00	4.00
50 yr PWLB	5.30	5.10	4.90	4.70	4.50	4.30	4.10	4.00	3.90	3.90	3.80	3.80	3.80

PWLB forecasts are based on PWLB certainty rates.

6.2 ECONOMIC BACKGROUND

- The third quarter of 2023/24 saw:
 - A 0.3% m/m decline in real GDP in October, potentially partly due to unseasonably wet weather, but also due to the ongoing drag from higher interest rates. Growth for the second quarter, ending 30th September, was revised downwards to -0.1% and growth on an annual basis was also revised downwards, to 0.3%;
 - A sharp fall in wage growth, with the headline 3myy rate declining from 8.0% in September to 7.2% in October, although the ONS “experimental” rate of unemployment has remained low at 4.2%;
 - CPI inflation continuing on its downward trajectory, from 8.7% in April to 4.6% in October, then again to 3.9% in November;
 - Core CPI inflation decreasing from April and May’s 31 years’ high of 7.1% to 5.1% in November, the lowest rate since January 2022;
 - The Bank of England holding Bank Rate at 5.25% in November and December;
 - A steady fall in 10-year gilt yields as investors revised their interest rate expectations lower.
- The revision of GDP data in Q2 to a 0.1% q/q fall may mean the mildest of mild recessions has begun. Indeed, real GDP in October fell 0.3% m/m which does suggest that the economy may stagnate again in Q3. The weakness in October may partly be due to the unseasonably wet weather. That said, as the weakness was broad based it may also be the case that the ongoing drag from higher interest rates is more than offsetting any boost from the rise in real wages.

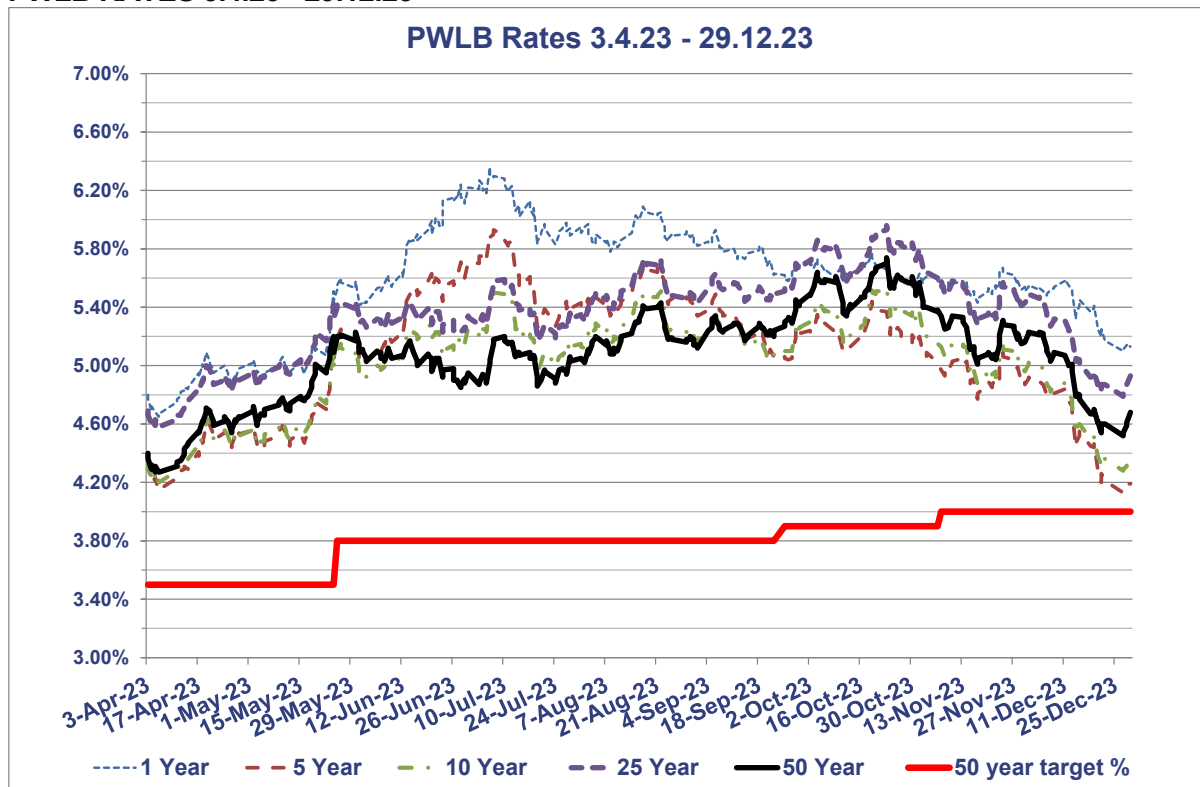
- However, the rise in the flash composite activity Purchasing Managers Index, from 50.7 in November to 51.7 in December, did increase the chances of the economy avoiding a contraction in Q3. The improvement was entirely driven by the increase in the services activity balance from 50.9 to 52.7. (Scores above 50 point to expansion in the economy, although only tepid in this instance.) The press release noted that this was primarily driven by a revival in consumer demand in the technological and financial services sectors. This chimes with the further improvement in the GfK measure of consumer confidence in December, from -24 to -22. The services PMI is now consistent with non-retail services output growing by 0.5% q/q in Q3, but this is in stark contrast to the manufacturing sector where the output balance slumped from 49.2 to 45.9 and, at face value, the output balance is consistent with a 1.5% q/q fall in manufacturing output in Q3.
- The 0.3% m/m fall in retail sales volumes in October means that after contracting by 1.0% q/q (which was downwardly revised from -0.8% q/q) in Q2, retail activity remained weak at the start of Q3. That suggests higher interest rates are taking a bigger toll on real consumer spending.
- Higher interest rates have filtered through the financial channels and weakened the housing market but, overall, it remains surprisingly resilient with the Halifax house price index recently pointing to a 1.7% year on year increase whilst Nationwide's December data pointed to a -1.8% year on year decrease. However, the full weakness in real consumer spending and real business investment has yet to come as currently it is estimated that around two thirds to a half of the impact of higher interest rates on household interest payments has yet to be felt.
- Overall, we expect real GDP growth to remain subdued throughout 2024 as the drag from higher interest rates is protracted but a fading of the cost-of-living crisis and interest rate cuts in the second half of 2024 will support a recovery in GDP growth in 2025.
- The labour market remains tight by historical standards, but the sharp fall in wage growth seen in October will reinforce the growing belief in markets that interest rates will be cut mid-2024. Wage growth eased in October much faster than the consensus expected. Total earnings fell by 1.6% m/m, which meant the headline 3myy rate eased from 8.0% in September to 7.2% in October. This news will be welcomed by the Bank of England. Indeed, the timelier three-month annualised rate of average earnings growth fell from +2.4% to -1.2%. Excluding bonuses, it fell from 5.3% to 2.0%. Furthermore, one of the Bank's key barometers of inflation persistence, regular private sector pay growth, dropped from 7.9% 3myy to 7.3%, which leaves it comfortably on track to fall to 7.2% by December, as predicted by the Bank in November.
- The fall in wage growth occurred despite labour demand being stronger in October than expected. The three-month change in employment eased only a touch from +52,000 in September to +50,000 in October. But resilient labour demand was offset by a further 63,000 rise in the supply of workers in the three months to October. That meant labour supply exceeded its pre-pandemic level for the first time, and the unemployment rate remained at 4.2% in October. In the three months to November, the number of job vacancies fell for the 17th month in a row, from around 959,000 in October to around 949,000. That has reduced the vacancy to unemployment ratio as demand for labour eases relative to supply, which may support a further easing in wage growth in the coming months.
- CPI inflation fell from 6.7% in September to 4.6% in October, and then again to 3.9% in November. Both these falls were bigger than expected and there are clear signs of easing

in domestic inflationary pressures. The fall in core CPI inflation from 5.7% to 5.1% in November was bigger than expected (consensus forecast 5.6%). That's the lowest rate since January 2022. Some of the decline in core inflation was due to the global influence of core goods inflation, which slowed from 4.3% to 3.3%. But some of it was due to services inflation falling from 6.6% to 6.3%. The Bank views the latter as a key barometer of the persistence of inflation and it came in further below the Bank's forecast of 6.9% in its November Monetary Policy Report. This will give the Bank more confidence that services inflation is now on a firmly downward path.

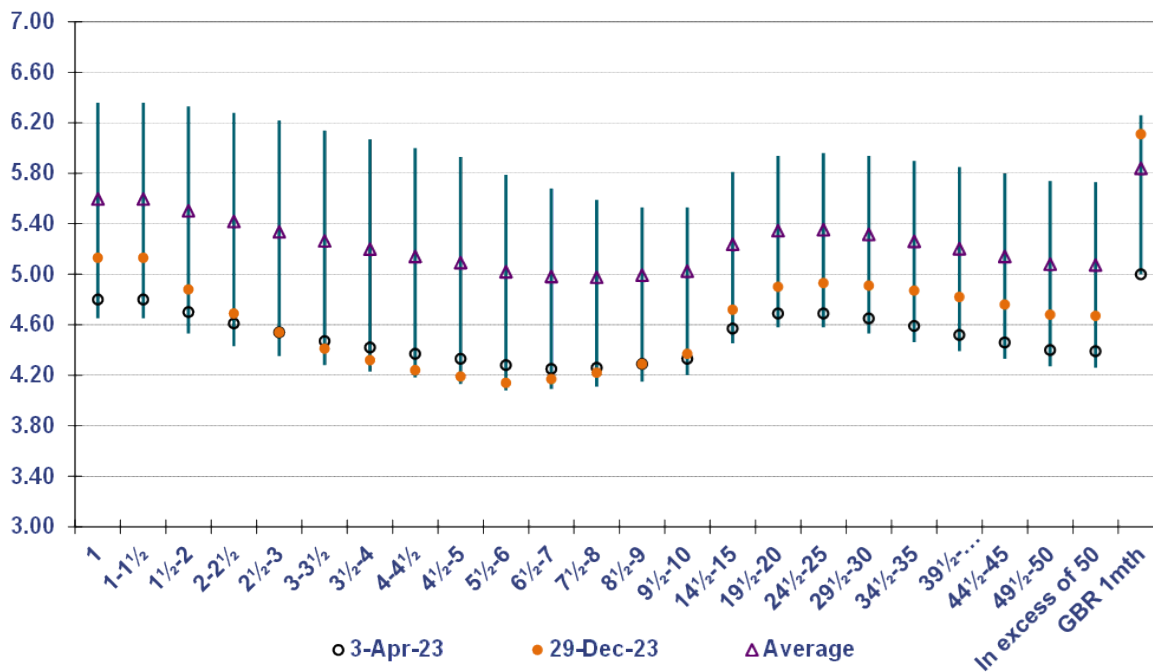
- The Bank of England sprung no surprises with its December monetary policy committee (MPC) meeting, leaving interest rates at 5.25% for the third time in a row and pushing back against the prospect of near-term interest rate cuts. The Bank continued to sound hawkish, with the MPC maintaining its tightening bias saying that “further tightening in monetary policy would be required if there were evidence of more persistent inflationary pressures”. And it stuck to the familiar script, saying that policy will be “sufficiently restrictive for sufficiently long” and that “monetary policy is likely to need to be restrictive for an extended period of time”. In other words, the message is that the MPC is not yet willing to endorse investors' expectations that rates will be cut as soon as May 2024.
- Looking ahead, our colleagues at Capital Economics forecast that the recent downward trends in CPI and core inflation will stall over the next few months before starting to decline more decisively again in February. That explains why we think the Bank of England won't feel comfortable cutting interest rates until H2 2024.
- The fall in UK market interest rate expectations in December has driven most of the decline in 10-year gilt yields, which have fallen in line with 10-year US Treasury and euro-zone yields. 10-year gilt yields have fallen from 4.68% in October 2023 to around 3.70% in early January, with further declines likely if the falling inflation story is maintained.
- Investors' growing expectations that the Fed will cut interest rates soon has led to an improvement in risk sentiment, which has boosted the pound and other risky assets. In addition, the rise in the pound, from \$1.21 in November to \$1.27 now, has also been supported by the recent relative decline in UK wholesale gas prices.
- The further fall in 10-year real gilt yields in December has supported the recent rise in the FTSE 100. That said, the index remains 5% below its record high in February 2023. This modest rise in equities appears to have been mostly driven by strong performances in the industrials and rate-sensitive technology sectors. But UK equities have continued to underperform US and euro-zone equities. The FTSE 100 has risen by 2.2% in December, while the S&P 500 has risen by 3.8%. This is partly due to lower energy prices, which have been a relatively bigger drag on the FTSE 100, due to the index's high concentration of energy companies.

In the chart below, the rise in gilt yields across the curve in the first half of 2023/24, and therein PWLB rates, is clear to see, prior to the end of year rally based on a mix of supportive domestic and international factors.

PWLB RATES 3.4.23 - 29.12.23



PWLB Certainty Rate Variations 3.4.23 to 29.12.23



HIGH/LOW/AVERAGE PWLB RATES FOR 3.4.23 – 29.12.23

	1 Year	5 Year	10 Year	25 Year	50 Year
Low	4.65%	4.13%	4.20%	4.58%	4.27%
Date	06/04/2023	27/12/2023	06/04/2023	06/04/2023	05/04/2023
High	6.36%	5.93%	5.53%	5.96%	5.74%
Date	06/07/2023	07/07/2023	23/10/2023	23/10/2023	23/10/2023
Average	5.60%	5.09%	5.03%	5.35%	5.08%
Spread	1.71%	1.80%	1.33%	1.38%	1.47%

MPC meetings 2nd November and 14th December 2023

- On 2nd November, the Bank of England's Monetary Policy Committee (MPC) voted to keep Bank Rate on hold at 5.25%, and on 14th December reiterated that view. Both increases reflected a split vote, the latter by 6 votes to 3, with the minority grouping voting for an increase of 0.25% as concerns about "sticky" inflation remained in place.
- Nonetheless, with UK CPI inflation now at 3.9%, and core inflating beginning to moderate (5.1%), markets are voicing a view that rate cuts should begin in Q1 2024/25, some way ahead of the indications from MPC members. Of course, the data will be the ultimate determinant, so upcoming publications of employment, wages and inflation numbers will be of particular importance, and on-going volatility in Bank Rate expectations and the gilt yield curve can be expected.
- In addition, what happens outside of the UK is also critical to movement in gilt yields. The US FOMC has kept short-term rates in the range of 5.25%-5.50%, whilst the ECB has moved its Deposit rate to a probable peak of 4%. Markets currently expect both central banks to start cutting rates in 2024.

6.3 TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT OPTION 1

SPECIFIED INVESTMENTS: All such investments will be sterling denominated, with **maturities up to maximum of 1 year**, meeting the minimum 'high' quality criteria where applicable.

NON-SPECIFIED INVESTMENTS: These are any investments which do not meet the specified investment criteria. A maximum of 100% will be held in aggregate in non-specified investment

A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made it will fall into one of the above categories.

The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

	Minimum credit criteria / colour band	** Max % of total investments/ £ limit per institution	Max. maturity period
DMADF – UK Government	N/A	100%	6 months
UK Government gilts	UK sovereign rating	50%	12 months
UK Government Treasury bills	UK sovereign rating	50%	12 months
Bonds issued by multilateral development banks	AAA (or state your criteria if different)	50%	6 months
Money Market Funds (CNAV, LNAV and VNAV)	AAA	100%	Liquid
Ultra-Short Dated Bond Funds with a credit score of 1.25	AAA	100%	Liquid
Ultra-Short Dated Bond Funds with a credit score of 1.5	AAA	100%	Liquid
Local authorities	N/A	100%	12 months
Gloucestershire Airport	N/A	£7.25m	
Marketing Gloucester	N/A	£0.24m	
Rokeby Merchant	N/A	£0.6m	
Ladybellegate Estates	N/A	£1.8m	

Gloucestershire Wildlife Trust	N/A	£0.55m	
Term deposits with banks and building societies	Blue Orange Red Green No Colour	£10m £10m £10m £10m £0	12 months 12 months 6 months 100 days Not for use
CDs or corporate bonds with banks and building societies	Blue Orange Red Green No Colour	£1m £1m £1m £1m £0	12 months 12 months 6 months 100 days Not for use
Gilt funds	UK sovereign rating	Nil	
CCLA Property/DIF Funds		£15m	10 years

Accounting treatment of investments. The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

6.4 APPROVED COUNTRIES FOR INVESTMENTS

This list is based on those countries which have sovereign ratings of AA- or higher, (we show the lowest rating from Fitch, Moody's and S&P) and also, (except - at the time of writing - for Hong Kong and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link creditworthiness service.

Based on lowest available rating

AAA

1. Australia
2. Denmark
3. Germany
4. Netherlands
5. Norway
6. Singapore
7. Sweden
8. Switzerland

AA+

9. Canada
10. Finland
11. U.S.A.

AA

12. Abu Dhabi (UAE)

AA-

13. Belgium

14. France

15. Qatar

16. U.K.

6.5 TREASURY MANAGEMENT SCHEME OF DELEGATION

(i) Council

- receiving and reviewing reports on treasury management policies, practices and activities;
- approval of annual strategy.

(ii) Audit and Governance Committee

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- budget consideration and approval;
- approval of the division of responsibilities;
- receiving and reviewing regular monitoring reports and acting on recommendations;
- approving the selection of external service providers and agreeing terms of appointment.

(iii) Body/person(s) with responsibility for scrutiny

- reviewing the treasury management policy and procedures and making recommendations to the responsible body.

6.6 THE TREASURY MANAGEMENT ROLE OF THE SECTION 151 OFFICER

The S151 (responsible) officer

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- submitting regular treasury management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the treasury management function;
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- ensuring the adequacy of internal audit, and liaising with external audit;
- recommending the appointment of external service providers.
- preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe ensuring that

the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money

- ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the authority
- ensure that the authority has appropriate legal powers to undertake expenditure on non-financial assets and their financing
- ensuring the proportionality of all investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources
- ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities
- provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees
- ensuring that members are adequately informed and understand the risk exposures taken on by an authority
- ensuring that the authority has adequate expertise, either in house or externally provided, to carry out the above
- creation of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed, to include the following
 - *Risk management (TMP1 and schedules), including investment and risk management criteria for any material non-treasury investment portfolios;*
 - *Performance measurement and management (TMP2 and schedules), including methodology and criteria for assessing the performance and success of non-treasury investments;*
 - *Decision making, governance and organisation (TMP5 and schedules), including a statement of the governance requirements for decision making in relation to non-treasury investments; and arrangements to ensure that appropriate professional due diligence is carried out to support decision making;*
 - *Reporting and management information (TMP6 and schedules), including where and how often monitoring reports are taken;*
 - *Training and qualifications (TMP10 and schedules), including how the relevant knowledge and skills in relation to non-treasury investments will be arranged.*

Gloucester City Council

Meeting:	Cabinet Council	Date:	6 March 2024 21 March 2024
Subject:	Pay Policy Statement 2024/25		
Report Of:	Cabinet Member for Performance and Resources		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Greg Maw, Head of Finance and Resources		
	Email: greg.maw@gloucester.gov.uk	Tel:	396422
Appendices:	1. Pay Policy Statement for 2024/25		

FOR GENERAL RELEASE

1.0 Purpose of Report

- 1.1 The purpose of this report is to consider and approve the Council's Pay Policy Statement for 2024/25.
- 1.2 Section 38 of the Localism Act 2011 requires local authorities to produce an annual pay policy statement from 2012/13 onwards, which must be agreed annually by full council.

2.0 Recommendations

- 2.1 Cabinet is asked to **RECOMMEND** that the Pay Policy Statement for 2024/25 attached as Appendix 1 be approved.
- 2.2 Council is asked to **RESOLVE** that the Pay Policy Statement for 2024/25 attached as Appendix 1 be approved.

3.0 Background and Key Issues

- 3.1 The Council's proposed pay policy for 2024/25 is attached to this report. The statement has been developed in response to the requirements of the Localism Act 2011 and follows guidance which accompanied the Act.

4.0 Social Value Considerations

- 4.1 None

5.0 Environmental Implications

- 5.1 None

6.0 Alternative Options Considered

6.1 The council is required to produce the statement in accordance with the Localism Act 2011; there is no alternative option on this matter.

7.0 Reasons for Recommendations

7.1 To demonstrate transparency in publication of the Council's pay policy arrangements in accordance with the principles of the Localism Act.

8.0 Future Work and Conclusions

8.1 None.

9.0 Financial Implications

9.1 None.

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

10.0 Legal Implications

10.1 Production of an annual pay policy statement is a requirement of the Localism Act 2011.

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

11.0 Risk & Opportunity Management Implications

11.1 The Council must have a current Pay Policy Statement in place in accordance with the legal requirements above.

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 The policy will be shared with the Trade Unions at one of the routine monthly meetings

Background Documents: None

Gloucester City Council**Pay Policy Statement 2024/25****Introduction and Purpose**

Gloucester City Council employs approximately 298 staff which equates to 265.65 Full Time Equivalent staff (FTEs). Please note that this figure excludes casual and zero hours staff and is as at 1st January 2024.

The provision of many of the Council's services is outsourced to the private or third sectors and some others are carried out by partner councils through shared service arrangements. Gloucester City Council remains responsible for these services. The Council's annual gross expenditure is approximately £98m per Comprehensive Income and Expenditure Statement for 2021/22.

Under section 112 of the Local Government Act 1972, the Council has the "power to appoint officers on such reasonable terms and conditions as the authority thinks fit". This Pay Policy Statement (the 'statement') sets out the Council's approach to pay policy in accordance with the requirements of Section 38 of the Localism Act 2011. The purpose of the statement is to provide transparency with regard to the Council's approach to setting the pay of its employees by identifying:

- the methods by which salaries of all employees are determined;
- the detail and level of remuneration of its most senior staff i.e. 'Chief Officers', as defined by the relevant legislation.
- the arrangements for ensuring the provisions set out in this statement are applied consistently throughout the Council.

An original version of this policy statement was approved by the Council in 2012. This policy statement will come into immediate effect and will be subject to review on a minimum of an annual basis in accordance with the relevant legislation prevailing at that time.

Legislative Framework

In determining the pay and remuneration of all of its employees, the Council will comply with all relevant employment legislation. This includes the Equality Act 2010, Part Time Employment (Prevention of Less Favourable Treatment) Regulations 2000, The Agency Workers Regulations 2010 and where relevant, the Transfer of Undertakings (Protection of Employment) Regulations 2006. With regard to the Equal Pay requirements contained within the Equality Act, the Council ensures there is no pay discrimination within its pay structures and that all pay differentials can be objectively justified through the use of equality proofed Job Evaluation mechanisms which directly relate salaries to the requirements, demands and responsibilities of the role.

Pay Structure

The Council's pay and grading structure comprises Grades A-H as 'Green Book' staff and 'Job Size 1 - 5' for posts as Chief Officer's roles. Director positions are paid at Job Size 5 (SMT1) with the Managing Director being paid at SMT2. Within each grade there are a number of salary

pay points. The Council uses a structure based around the nationally determined pay spine for grades A to H with all posts being evaluated under the HAY job evaluation scheme. For salary points above this, i.e. for Job Size 1 and above, grades are determined following evaluation under the HAY job evaluation scheme and are approved by the General Purposes Committee.

The Council's 'Green Book' Pay Structure (grades A-H) for 2023/24 as set out in the table below.

Grade	Spinal Column Points		Pay Scale	
	From	To	Minimum £	Maximum £
A	1	3	22,366	22,737
B	4	5	23,114	23,500
C	6	8	23,893	24,702
D	10	14	25,545	27,334
E	16	20	28,282	30,296
F	21	25	30,825	33,945
G	26	29	34,834	35,411
H	31	35	37,261	41,496

The Chief Officer pay scale for 2023/24 is as set out below.

Grade	Job Size	Pay Scale	
		Minimum £	Maximum £
I	1	43,889	49,124
J	1	50,171	53,259
K	2	54,296	57,394
L	2	58,630	62,672
M	3	63,504	69,515
N	3	70,851	77,015
Job Size 4	4	79,852	88,047
Job Size 5 (SMT1)	5	94,132	103,829

The

Council

remains committed to adherence with national pay bargaining in respect of the national pay spine and any annual cost of living increases nationally determined in the pay spine.

Council posts are allocated to a grade within the Pay Structure based on the application of the Hay Job Evaluation scheme.

In determining its grading structure and setting remuneration levels for all posts, the Council takes account of the need to ensure value for money in respect of the use of public expenditure, balanced against the need to recruit and retain employees who are able to meet the requirements of providing high quality services to the community, delivered effectively and efficiently and at times at which those services are required.

In relation to progression within a post grade, with the exception of career grades which will usually require the achievement of some criterion before progression occurs, employees generally progress from the minimum spinal column point of their grade in April each year until they reach the maximum of their post grade. This is not the policy for posts at Chief Officer level (job size 1 and above), where progression within grades is subject to performance.

New appointments will normally be made at the minimum of the relevant grade, although this can be varied if necessary to secure the best candidate as per the Council's Starting Salary Policy. From time to time it may prove appropriate to take account of the external pay market such as where difficulties in attracting applicants or retaining employees with particular experience, skills and capacity occur. Where necessary, the Council will ensure the requirement for such market forces supplements is objectively justified by reference to clear and transparent evidence of relevant market comparators, using appropriate and timely data sources available from within and outside the local government sector.

Other pay related allowances are the subject of either nationally or locally negotiated rates, having been determined from time to time in accordance with collective bargaining machinery and/or as determined by Council Policy.

Pay Awards

The Council's policy is to apply any nationally negotiated pay awards to employees at all levels of the Council. This will cover conditions of service in respect of both NJC for Local Government Services (Green Book) and NJC for Chief Officers.

An exception to this will be where employees have transferred to the Council under the Transfer of Undertaking (Protection of Employment) Regulations 2006 ('TUPE'), retaining statutory protection of the pay and conditions that applied with their previous employer. Any post-transfer local government pay award in such circumstances will not be automatically applied but will be considered on a case-by-case basis and with due regard to equal pay legislation, including the Public Sector Equality Duty.

Chief Officers' Remuneration

The term 'Chief Officer' as used in this policy refers to those defined as such within the Localism Act 2011. The Chief Officer posts covered by this policy are therefore the Chief Executive and those posts which report directly to the Chief Executive, and also the next management tier

below (excluding any secretarial, clerical or administrative support roles), as set out in the Council's constitution.

All references to 'Chief Officers' in this policy statement are therefore in respect of the above definition (i.e. to be distinguished from the potentially wider group of senior staff employed by the Council in posts subject to National Joint Council (NJC) for Chief Officers national conditions of service (also known as the Blue Book) – where this wider group of staff are referred to elsewhere in this policy they are not therefore to be construed as 'Chief Officers' as defined under the Localism Act).

The Chief Officer posts falling within the statutory definition are set out below, with details of their basic full-time equivalent (FTE) salary as at 1 April 2023.

a) Managing Director

The current salary of the post is £ 131,153 per annum.

In addition to this, payments for returning officer duties are made to the Managing Director. For local elections (Parish, District and County) this remains in accordance with the scale of fees agreed by all authorities in Gloucestershire. Fees for Parliamentary, European and national referenda are set nationally.

b) Directors job size 5

The salaries of posts designated as Directors fall within a range between £ 94,132 rising to a maximum of £ 103,829. Progression through the range is subject to performance.

Management Posts currently members of the Senior Management Team also defined as 'Chief Officers' for pay policy purposes:

c) Heads of Place, Culture and Leisure Services, Finance and Resources and Transformation and Commissioning

The salaries of the posts are designated "Head of" are job size 4 and fall within the range of £79,852 to £88,047. Progression through the range is subject to performance.

Other Management posts reporting to the Senior Management Team

The salaries of posts reporting to the Senior Management Team include posts at job size 1 (grades I to J SCP 42-51) and upwards. Progression through grades at Chief Officer level (job size 1 to job size 5) is not automatic and is based on performance.

Recruitment of Chief Officers

The Council's policy and procedures with regard to recruitment of Directors and Statutory Officers is set out within part 5 - section 10 and part 2 Article 8 of the Council's Constitution.

When recruiting to all posts the Council will take full and proper account of its own Equal Opportunities, Vacancy Management and Redeployment Policies. The determination of the remuneration to be offered to any newly appointed Chief Officer will be in accordance with the Pay Structure and relevant policies in place at the time of recruitment in addition to external market advice and the HAY job evaluation process. Where the Council is unable to recruit to

a post at the designated grade, it will consider the use of temporary market forces supplements in accordance with its relevant policies.

Where the Council remains unable to recruit Chief Officers under a contract of service, or there is a need for interim support to provide cover for a vacant substantive Chief Officer post, the Council will, where necessary, consider and utilise engaging individuals under 'contracts for service'. These will be sourced through a relevant procurement process ensuring the Council is able to demonstrate the maximum value for money and the benefits from competition in securing the relevant service. The Council does not currently have any Chief Officers engaged under such arrangements.

Interim appointments

For these purposes an 'interim' appointment will be an engagement other than through a regular contract of employment on standard Council terms and conditions of service (e.g. engagement through an agency or consultancy arrangement).

The Council is conscious of the need to secure value for money in the contractual arrangements for all appointments, including the need to ensure no one is inappropriately enabled to achieve a more favourable position in respect of their tax liabilities ('tax avoidance') than might otherwise apply. The Council will therefore have proper regard to this principle in applying the HMRC test for tax status under the IR35 tax provisions for 'off-payroll' engagements.

Additions to Salaries of Chief Officers

In addition to basic salary, set out below are details of other elements of current 'additional pay' provisions which are chargeable to UK Income Tax and do not solely constitute reimbursement of expenses incurred in the fulfilment of duties:

- Fees paid for returning officer duties where identified and paid separately (see above);
- Market forces supplements in addition to basic salary where identified and paid separately (see above);
- Professional subscriptions are not normally paid for any staff;
- Honoraria or ex-gratia payments may only be made to staff including Chief Officers for undertaking additional duties outside of their substantive role for which they receive an amount reflective of the duration and nature of the work they undertake. For Chief Officers, such payments are rare and will only be made in accordance with the Council's relevant policy.

Subject to qualifying conditions, employees have a right to join the Local Government Pension Scheme.

The employee contribution rates are set nationally through the LGPS regulations whereas the employer contribution rates are set by Actuaries advising the Gloucestershire Pension Fund and are reviewed on a triennial basis in order to ensure the scheme is appropriately funded. The employer's contribution rate for Gloucester City Council, set at the last triennial review, is 19.4%.

Payments on Termination

The Council's approach to discretionary payments on termination of employment of Chief Officers, prior to reaching normal retirement age, is set out within its policy statement in accordance with Regulations 5 and 6 of the Local Government (Early Termination of Employment) (Discretionary Compensation) Regulations 2006 and Regulations 12 and 13 of the Local Government Pension Scheme (Benefits, Membership and Contribution) Regulations 2007.

Redundancy payments are based upon an employee's actual weekly salary and, in accordance with the approved policy, will be up to 60 weeks' pay, depending upon length of service and age.

Furthermore, the Council will not re-employ Chief Officers either directly or under a contract for service (e.g.: in a consulting or advisory capacity) who have previously been made redundant by the Council.

It is noted that, at the time of publication, the Government's position relating to the statutory restriction of public sector exit payments remains unclear. The Restriction of Public Sector Severance Payment Regulations 2020 that came into effect on 4th November 2020 were subsequently revoked on 12th February 2021. The stated reason for the revocation was that the regulations had resulted in 'unexpected consequences' in some cases. However, the Government has indicated work is proceeding at pace to introduce alternative arrangements to 'restrict excessive exit payments to public sector employees'. Any legislation that is introduced as a result of this will be incorporated into the relevant Pay Policy Statement.

Any other allowances arising from employment

The following allowances apply to all employees:

Payment for acting up or additional duties

Chief Officers are expected to be flexible in managing changing requirements. Therefore honoraria would only be paid in exceptional circumstances at this senior level.

In limited situations where an employee may be required to complete work of a higher graded post or undertake duties outside the scope of their role, the Council may consider a payment consistent with job evaluation principles. Any such payments are subject to review and are only for limited periods.

Unsocial hours payments

The Council does not make unsocial hours payments to Chief Officers

For other employees, the Council recognises that certain roles and services require employees to work unsocial hours, or be available to work and therefore on standby. In these circumstances the Council has a policy to provide additional payments or time off in lieu for eligible employees.

Recruitment and retention allowances

Whilst the Council does not currently apply any recruitment or retention allowances it has the scope to locally agree such payments if necessary. The General Purposes Committee would agree any such payments for post above Job Size 4 and for all other employees the decision would be made by the Head of Paid Service.

Car and motor cycle allowances

Reimbursement of approved business mileage is made in accordance with the Council’s locally agreed mileage rates. These rates, which mirror the HMRC mileage allowance payments, are reviewed annually.

Lowest Paid Employees

The Council has a commitment to pay no employee (excluding apprentices) less than scale point 3 of the ‘Green Book’ pay scale (£ 22,737 per annum, £ 11.79 per hour) and remains committed to paying above the foundation living wage rate.

Apprentices do not fall within the definition of ‘lowest paid employees’, as they are not part of the Council’s approved staffing establishment and are employed under separate terms. In 2023, the Council increased the rate of pay for apprentices as follows:

- Level 2 Apprentices- £ 7.31 per hour
- Level 3 Apprentices- £ 8.83 per hour or National Minimum Wage if this is higher for their age

The relationship between the rate of pay for the lowest paid and Chief Officers is determined by the HAY job evaluation process used for determining pay and grading structures as set out earlier in this policy statement.

The relationship between the remuneration of Chief Officers and employees who are not Chief Officers

The Council does not have a policy on pay multiples but recognises that the Hutton Review of Fair Pay in the Public Sector recommends a maximum ratio of the highest remunerated post compared with the lowest remunerated post of 1: 20.

In accordance with the Local Government Transparency Code (2014), the Council uses the principle of pay multiples to provide a wider understanding of the relationship between its highest and lowest paid employees. It recommends the publication of the ratio between highest paid salary and the median average salary of the whole of the Council’s workforce.

The multiples are as follows*:

	Annual salary FTE	Multiplier
Highest paid taxable earnings	£ 131,153	N/A
Median earnings	£ 29,269	4.48
Lowest earnings	£ 22,269	5.89

* Data is accurate as of the 1 January 2024 and excludes apprentices

As part of its overall and ongoing monitoring of alignment with external pay markets - both within and outside the sector, the Council will use available benchmarking information as appropriate. This will include the pay multiples as set out above.

Publication

Upon approval by the full Council, this statement will be published on the Council's Website. In addition, for posts where the full time equivalent salary is at least £50,000, the Council's Annual Statement of Accounts will include a note on Officers Remuneration setting out the total amount of:

- Salary, fees or allowances paid to or receivable by the person in the current and previous year;
- Any bonuses so paid or receivable by the person in the current and previous year;
- Any sums payable by way of expenses allowance that are chargeable to UK income tax;
- Any compensation for loss of employment and any other payments connected with termination;
- Any benefits received that do not fall within the above.

In addition to this pay policy statement, the key roles and responsibilities and employment benefits for each of our Senior Management Team members will be available on the Council's website www.gloucester.gov.uk.

Accountability and Decision Making

In accordance with the Constitution of the Council, the General Purposes Committee has delegated powers to monitor employment legislation and ensure that personnel procedures and guidelines in respect of recruitment, grievance and discipline are in place and up to date. The committee is also responsible for the contractual terms and conditions of the Managing Director, the Corporate Directors and the Monitoring Officer.

Appointment of the Managing Director is made by full council. Appointments of Corporate Directors and the Monitoring Officer are made by a councillor level selection committee of the Appointments Committee. All other appointments are made at Corporate Director level, delegated where appropriate to Heads of Service and Service Managers.

Policy review

This policy will be reviewed no later than 31 March 2025 and thereafter on an annual basis.

The Council may amend the policy at any time with Full Council approval. If any amendments are made the revised version will be published on the Council's website.