

Regulation 22 Statement of Gloucester City Council **In support of the Gloucester City Plan 2011 – 2031**

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1. Purpose and background

- 1.1 This Consultation Statement has been prepared by Gloucester City Council and sets out how residents and key stakeholders have been engaged in the preparation of the Gloucester City Plan (GCP) 2011 – 2031, in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 This statement is in addition to the Pre-Submission Gloucester City Plan Consultation Statement (September 2019) and specifically meets Regulation 22(1)(c) and demonstrates that consultation on the preparation of GCP has been undertaken in accordance with relevant Regulations and the City Council's adopted [Statement of Community Involvement \(SCI\) \(2015\)](#). The SCI sets out how the City Council will consult and involve residents, statutory consultees and stakeholders in different planning matters, including the preparation of Development Plan Documents.
- 1.3 Regulation 22(1)(c) requires as part of the documentation to be sent to the Secretary of State:
- (c) a statement setting out—*
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,*
 - (ii) how those bodies and persons were invited to make representations under regulation 18,*
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,*
 - (iv) how any representations made pursuant to regulation 18 have been taken into account;*
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
 - (vi) if no representations were made in regulation 20, that no such representations were made;*
- 1.4 The main body of this report provides an overview of the timeline and consultation process that the City Council has undertaken in preparing the GCP, across both Regulation 18 and 19.
- 1.5 Appendices 1 – 8 then provide further detail in relation to the Regulation 18 consultations, including the purpose of each of the consultations, how consultees were engaged and how feedback fed into the plan-making process.
- 1.6 Appendices 9 then provides a summary of the consultation activities and responses in relation to the Regulation 19 consultation. Submission document CD010d 'Summary of representations with officer response' provides a more detailed summary.

2. Timeline

- 2.1 The GCP has been prepared over several years and has been through different stages, staggered slightly behind the Joint Core Strategy (JCS), which was adopted in December 2017. The Local Development Scheme (LDS) has been updated to reflect changes to the JCS programme. At each stage, there has been engagement with the community and stakeholders on what the content of the GCP should be, and in order to generate comment and debate on draft proposals as they emerge. The process to date has been as follows:

- a) **Gloucester City Plan Scope (2011):** This consultation set out the context for the plan and the key issues for Gloucester. It sought views on the types of planning policies that the GCP should contain and the areas that should be identified for development or protection.
- b) **Sustainability Appraisal Scoping:** Undertaken by City Council officers, using Sustainability Appraisal (SA) work prepared for previous development plan process and the emerging JCS.
- c) **Gloucester City Plan Part 1 (2012):** This stage of the plan took the scope further, providing detail of the issues that Gloucester faces and setting out a number of 'key principles' that should be taken forward in the GCP.
- d) **Gloucester City Plan Part 2 (2013):** This stage of the plan focused on the development needs of the city and considered potential site allocations.
- e) **Sustainability Appraisal update (2016):** Specialist consultants Enfusion appointed to progress Sustainability Appraisal (incorporating Equalities Impact Assessment and Health Impact Assessment) and Habitats Regulations Assessment. At this stage relevant plans, programmes and baseline information were reviewed, updated and analysed to ensure key issues and opportunities in the area were identified and reflected in the SA Framework and objectives.
- f) **Gloucester City Plan - Draft Plan (2017):** This stage of the plan pulled the previous stages together, drawing on the outcomes of the different consultations to set out a range of proposed site allocations and detailed policies.
- g) **Gloucester City Plan - Pre-Submission (2019/20):** This is the final stage of plan-making before Submission to the Secretary of State for Examination in Public. The GCP was published for consultation between 7 November 2019 and 14 February 2020.

3. Consultation approach

3.1 At each stage, public consultation was undertaken in accordance with the City Council's adopted Statement of Community Involvement (SCI). Table 1 below is an extract from the document, providing details of the consultation methods available when consulting on Development Plan Documents.

Table 1. Consultation arrangements for Development Plan Documents – as per Gloucester City Council's adopted Statement of Community Involvement.			
Stage	Preparation	Who	How
Preparation of a local plan (Regulation 18)	Evidence gathering	Specific and general consultees Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate	Letter, email, internet, forums,
Publication of a local plan (Regulations 19 and 20)	Consult on proposed submission document	Specific and general consultees Those registered on Council's database Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate	Letter, email, internet, press releases, exhibitions, questionnaires, forums, events, deposit locations

Submission of documents and information to the Secretary of State (Regulation 22)	Submission of Local Plan and all associated documents in accordance with Regulation 22	Specific and general consultees Those registered on the Council's database Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate Those who have responded previously/asked to be notified of submission	Letter, email, internet, deposit locations
Independent examination (Regulation 24)	Independent examination of plan by an appointed Inspector	All those who made representations	Letter, email, internet, press releases, deposit locations
Adoption (Regulation 26)	Adoption of the plan by the Local Planning Authority	All those involved in the process	Letter, email, internet, press releases, deposit locations
Monitoring	After adoption of the plan	Specific consultees Any other residents or other persons carrying out business in the area that the Council considers appropriate	Letter, email, internet
The SCI footnote for this table states: Please note that this table contains an overview of consultation methods available for each stage of Local Plan preparation. Not all methods will be used in each case, but those most suitable and appropriate given the scale and nature of the consultation will be used.			

4. Gloucester City Plan preparation

- 4.1 The following section sets out further detail in relation to the scope and content of the consultation, and representations/comments received. Full summaries of the representations to each of the consultation stages, and how the responses shaped the GCP are provided as appendices.

Scope Gloucester City Plan – 2011 (Regulation 18)

- 4.2 The Scoping consultation took place between 23rd May and 23rd August 2011. It was the very starting point in thinking about what the GCP should contain, thinking about potential areas for development and the types of policies it should contain, thinking about how ‘...you would like to make Gloucester a thriving, prosperous and sustainable 21st Century Living City, in which to work, reside and enjoy’. The consultation included several public consultation events and was framed around several key questions;

1. Do you support the general scope of the City Plan or should the subject matter include something else?

2. Are the areas of opportunity the right areas of opportunity or should others be included? If so, please set out where and for what type of uses.
3. Is there an area of opportunity that you would specifically like to comment on; if so, what is your comment?
4. If you are a resident living in close proximity to an area of opportunity, how could its development help provide other improvements to your local area?
5. Whether or not you live near to an area of opportunity, please can you tell us where you would like to see improvements in your neighbourhood to make it a better place to live?
6. What matters to you about new development?

4.3 In total 414 individual comments were received. Further details on the consultation, including consultation methods, a narrative summary and how the comments informed the plan-making process are provided at Appendix 1A. The full response report is provided at Appendix 2.

Part 1 Gloucester City Plan – 2012: ‘Context and Key Principles’ (Regulation 18)

4.4 Part 1 of the GCP took forward the responses from the Scoping consultation and presented a range of different challenges the plan should seek to address, an indicative strategy ‘Going for growth’ and 13 Key Principles to deliver the strategy. The consultation sought feedback on the challenges, strategy and key development principles in order to inform the next stage of the plan.

4.5 In total 67 representations were received. Further details on the consultation, including consultation methods, a narrative summary and how the comments informed the plan-making process are provided at Appendix 1B. The full response report is provided at Appendix 3.

Part 2 Gloucester City Plan – 2013: ‘Places, Sites and City Centre Strategy’ (Regulation 18)

4.6 Part 2 of the GCP began the process of consulting on development need and opportunities based on a range of known sites. It also considered issues and opportunities on a ward-by-ward basis and presented a City Centre Vision and Strategy. Consultation was held between 13 May and 12 July 2013 and was supported by 18 consultation events, at least one in each electoral ward/parish and each lasting for three hours. The consultation events were independently facilitated by an organisation called the Gloucestershire Rural Community Council (GRCC), a local expert in community consultation.

4.7 In total, 297 individual comments were received. Further details on the consultation, including consultation methods, a narrative summary and how the comments informed the plan-making process are provided at Appendix 1C. The full response report is provided at Appendix 4.

Draft Gloucester City Plan – 2017 (Regulation 18)

4.8 The Draft GCP was the first time the plan was presented for consultation in its entirety, informed by the previous three consultations and the emerging evidence base. It includes a draft Vision, Key Principles, proposed site allocations, draft development management policies and a policies map. The formal consultation lasted for six weeks between 16th January and 27th February 2017 and was

supported by six public consultation events; two in the city centre and three at supermarkets around the city. The consultation itself didn't ask specific questions but instead sought feedback on the Draft Plan's content and the evidence.

- 4.9 In total, 64 representations were received, amounting to 267 individual comments. Further details on the consultation, including consultation methods, a narrative summary and how the comments informed the plan-making process are provided at Appendix 1D. The full response report is provided at Appendix 5.

Between Draft and Pre-Submission Gloucester City Plan - 2017 – 2019 (Plan-making)

- 4.10 From March 2017 work was undertaken to analyse the various stakeholder and consultee responses and to prepare additional evidence to support the Pre-Submission version of the GCP. New sites were considered through the annual Strategic Assessment of Land Availability process and the plan was amended to reflect changes to the NPPF and the strategic direction of the City Council.
- 4.11 At this point in the process, the JCS reached an advanced stage and was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council in December 2017. In response, the scope of the GCP was amended to reflect the revised content of the JCS, which was subject to a considerable amount of change through Main Modifications. For example, the adopted plan includes a much stronger focus on retail and city/town centres for Gloucester, with a commitment to undertake a full review at the JCS level. Therefore, some policy areas consulted on at the Draft GCP stage were not carried forward to the Pre-Submission version of the GCP as they are adequately covered in the Adopted JCS, or to be progressed through the Review.
- 4.12 Appendix 7 of this report provides a schedule of policies contained within the Pre-Submission GCP along with a headline summary of changes made since the Draft GCP, including where new policies have been created.
- 4.13 Appendix 8 provides the rationale for changes in site allocations (i.e. those that remain allocated between Draft and Pre-Submission, those that are no longer allocated, and those that are new allocations).

Pre-Submission Gloucester City Plan – 2019/20 (Regulation 19)

- 4.14 This was the final stage of plan-making before the GCP was submitted to the Secretary of State for independent examination. The consultation was published on 7 November 2019, initially closing on 17 December 2020. However, part way through the consultation it was established that several evidence base documents had not been published in the City Council's website. For that reason, and allowing for the Christmas period, the consultation was extended until Friday 14th February 2020, providing a further six-weeks of consultation on the Pre-Submission plan and evidence sources.
- 4.15 The GCP contains a Vision, Key Principles, 22 site allocation policies and a further 51 development management policies.
- 4.16 In total, 100 representations were received; 92 duly made and eight non-duly made. In total this amounts to 502 individual comments. A summary of the consultation and

headline comments received is provided at Appendix 9. A full representation summary, with a short officer response, if provided at Appendix 9A.

Appendix 1: Regulation 18 consultation summaries

As set out in the main body of this document there have been four different Regulation 18 consultations in relation to the Gloucester City Plan, held between 2011 and 2017. The GCP has been staggered behind the JCS as the strategic plan for Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils.

Appendix 1A: Scope Gloucester City Plan (2011)

The Scoping consultation took place between 23rd May and 23rd August 2011. It was the very starting point in considering what the GCP should contain, potential areas for development and the types of policies it should contain, thinking about how ‘...you would like to make Gloucester a thriving, prosperous and sustainable 21st Century Living City, in which to work, reside and enjoy’. The consultation included several public consultation events and was framed around several key questions;

1. Do you support the general scope of the City Plan or should the subject matter include something else?
2. Are the areas of opportunity the right areas of opportunity or should others be included? If so, please set out where and for what type of uses.
3. Is there an area of opportunity that you would specifically like to comment on; if so, what is your comment?
4. If you are a resident living in close proximity to an area of opportunity, how could its development help provide other improvements to your local area?
5. Whether or not you live near to an area of opportunity, please can you tell us where you would like to see improvements in your neighbourhood to make it a better place to live?
6. What matters to you about new development?

Consultation methods used at this stage were as follows:

- Publication on the City Council website
- Notifications to statutory, stakeholder consultation bodies (Appendix 6) and general consultation database
- Press notice
- Press release
- Social media posts
- Hard copies of all consultation documents in deposit locations.

Many consultation events were undertaken at this stage to raise awareness and generate feedback. Events were held at the following locations, events and meetings:

- Three Bridges Neighbourhood Partnership Meeting
- Matson and Robinswood Neighbourhood Partnership Meeting
- Barton and Tredworth Neighbourhood Partnership Meeting
- Barnwood Fun Day
- Elmbridge Neighbourhood Partnership
- Quedgeley Parish Council
- Picnic in the Park, Armscroft park formal gardens
- Barnwood Neighbourhood Partnership Meeting
- Mobile display unit in Kings Square (Westgate)
- Quedgeley Parish Councillors and Residents' Meeting
- Kingsholm and Wotton Neighbourhood Partnership Meeting

- Longlevens Neighbourhood Partnership Meeting
- Abbey Community Day
- Morrisons – Abbey
- Kingsway Funday
- Podsmead Community Day
- Asda - Barton and Tredworth
- City Centre Community Partnership
- Tesco at Quedgeley
- Hempsted Community Event
- Conservative, Lib Dem and Labour Groups
- Hucclecote Community Centre
- St Peter's School Fete, Tuffley
- Gloucestershire College: Young People aged 14-18 (3 sessions)
- G15 Youth Project - Video Diaries
- Social Media Youth Group
- Attending Gloucester Voluntary Sector Forum
- Gay Pride - Gloucester Park
- Walk about in Barton and Tredworth
- Workshop with Friends of Shopmobility (disability group)
- University of the Third Age (over 50s)
- Gloucester FM
- Planning Access Group
- St Oswald's Extra Care Village

What were the main issues raised?

Altogether, 414 individual comments were received. Of those, 59 % supported the document, 10% objected and 31% provided comment without stating whether they were supporting or objecting.

The following **general comments** were made regarding the City.

- Make Gloucester a good place to live, a healthy city for all its residents, fostering a sense of community and togetherness.
- There has been a steady decline in the appearance of the city centre. There are too many shop units, and they cover too great an area of the centre – need a concentrated shopping area.
- The whole centre needs a good clean-up. Gloucester has become...depressed, dirty, empty and sad. As a city we have more to offer than others with a beautiful cathedral, docks and history...everything that was good about the city has been pulled down or left to decay. I work in Gloucester but as for shopping I'd rather go to Bristol etc...as for the docks...well its been completely ruined.
- The Plans role should not be just about regeneration it should be to guide development as a whole which will include the use of appropriate greenfield land as part of the spatial strategy.
- Deal with problems in the city before bringing more people in.
- Many development areas listed will be started/completed in next 3-5 years. Need to ensure that they take on board City Vision issues.
- The sooner we have an inclusive mechanism for preparing neighbourhood plans then the sooner the community can make decisions about their community for themselves.
- Supports idea of improvement but we need basic overall fairness before we can afford choice.
- Concern over the way the cultural mix of the city is progressing.

The following **strategy issues** were raised:

- Set out the context of the plan within the JCS and how the City Vision and City Plan fits into aspirations for the area as a whole and the complexity of issues which must be considered.
- The number of sites shown across the City offers various opportunities for housing and business, but will this offer sufficient growth based on the rolling 5 year housing supply? According to current data the growth of the City over the next 20 years will ultimately use these resources; will there be sufficient land available for development beyond 2031?
- Areas outside the City Boundary that really should be included for development are: North of the City in Staverton, Innsworth, Churchdown and Shurdington. Between Eastington and Cam, east of the M5. The area to the north of the city is well serviced by road and rail, and has ready access to services denied to Quedgeley residents as a result of uncoordinated development over many years.
- Further development to the south of the principal urban area will only make worse problems in Quedgeley. A period of at least 15 years is required to allow the area to stabilise and develop adequate services.
- Between Eastington and Cam, east of the M5. This area is above the Severn flood plain, below to escarpment, outside the area of outstanding natural beauty, and sufficiently isolated from existing urban areas to allow a new town to be planned and provided. It has excellent links to the road system and an existing train station used by many Quedgeley residents commuting to Bristol.
- While Gloucester, Cheltenham and Tewkesbury have a beautifully coordinated development strategy, there appear to be several totally uncoordinated, huge developments imminent in Stroud District.
- The assessment of employment land must include all allocations up to 3 miles outside the City boundary. Employment uses outside the City boundaries are likely to undermine the potential for redevelopment of brown-field sites within the City.
- Concerns about further growth to the South of the City and the drain this may have on infrastructure in the area - this is unsustainable for the City.
- Much of the new housing and employment land will need to be delivered outside of the City's administrative boundaries but feel that the authority, if possible, should have a say in developments and section 106 monies that come in for those new areas.
- Develop North of the City - Junction 11a should be considered for further development as it has much better traffic flow than the other two motorway junctions.
- The historic environment is a key player in the regeneration of the town on a wider strategic basis. The City Vision should be closely aligned and cross referenced with the aims and objectives of the Joint Core Strategy as that work also progresses.
- There should be more mixed-use sites rather than just housing developments or employment use. Mixed use, housing, employment and leisure all over the county, not just concentrated in the city centre.

The following **key points for the City Plan** were raised:

- Focus on city centre first
- Encourage provision of more facilities for the city to improve its attractiveness
- Protect open space
- Provision of Affordable Housing
- Employment – provide jobs
- Give the Natural Environment a higher profile
- Protection of Historic Environment

- Address transportation issues in the city
- Greater emphasis on Crime and Safety
- Invest in Sport
- Balance Infrastructure provision and growth
- Waste and Recycling
- Retail issues
- Improve allotment provision
- More youth facilities
- High quality design
- Flooding issues – Do not build on flood plains.

In terms of **existing identified areas of development opportunity**, comments can be summarised as follows:

- **Kings Square and Bus Station**
Support given to this primary regeneration site which will improve the city centre environment, deliver a step change in the city's retail performance and act as a catalyst for attracting future city centre investment. This scheme is a priority for the City as a whole.
- **Greater Blackfriars**
Support given to this key site and the importance of its linkage to the city centre and to public open space and amenities. Suitable for residential, retail and employment. Develop a concert hall.
- **The Quays**
Some support for the regeneration but concern over amount of housing proposed. Requests for open space to enjoy area and more leisure uses. Monk Meadow unlikely to achieve 1000 units of accommodation. Bakers Quay opportunity for strong, mixed use development
- **Clearwater Drive**
The County Council is promoting this site as an opportunity for enhancing public open space and amenity land as part of a residential housing scheme. There is strong local opposition to these proposals which seek protection of all the open space at Clearwater Drive from development and retain the site as formal public open space for community use and wildlife enjoyment. In addition to this site further public open space is required close to Quedgeley community.
- **Land at Leven Close**
Various redevelopment suggestions submitted for this site including limited housing combined with an opportunity to increase public open space as well as a community/youth facility and additional parking to help with school run peaks.
- **Railway Corridor**
Support given for redevelopment of this brownfield regeneration site. Allstones site to be located elsewhere. However, difference of opinion on end use. More shops/supermarket and housing was not supported, Considered suitable for light industrial, sport and entertainment, for an urban green space for different leisure uses and a railway station location.
- **Land South of Barnwood Road and East of Eastern Avenue**
Seek consideration of this site for housing development rather than employment led regeneration.
- **Blackbridge Allotments**
Subject of a planning application. Promoted as a sustainable location for housing, enhance community space and provide improved allotments. Concern over amount of housing and impact on allotment provision as well as safety issues related to making the current cycle path between Stroud Road and Cole Avenue into a road.
- **Hempsted MOD site**

Objection received to redevelopment of this site with a suggestion of making this into a nature reserve. Others stated that if development did proceed there was concern over gated access to Honeythorn Close and need for high cost housing to ensure a viable scheme given site constraints.

- **Mayos Land**
This site should be allocated for public open space to address shortfall in Quedgeley. Please note that this site now has a residential planning permission and cannot therefore be considered further as an area of opportunity within the City Plan.
- **Land to the East of Waterwells Business Park**
Finish development on Land East of Waterwells and address local residents issues. Concern regarding oversupply of employment land at Waterwells, requests to consider an employment allocation for B1, B2 and B8 uses and some residential development to support provision of new infrastructure to open up the site with provision of open space linked to Hunts Grove plus reserve some land for a rail station.
- **RMC site, Waterwells Business Park**
Reserve for commercial leisure use rather than for employment purposes
- **Canal Corridor**
Support for its inclusion for redevelopment however need to protect the canal from pollution.
- **Clifton Road triangle Mixed response**
Support for residential use also considered suitable for mixed use development given surrounding area has changed and is very commercial in appearance.
- **Land adjacent to Walls Factory, Barnwood**
The site should be extended to include existing leisure buildings and a new comprehensive mixed use scheme considered. Do not build on flood plain.
- **Wellman Graham/Contract Chemicals Site**
Do not build on flood plain.
- **Tarrington Road Works**
Sensitive redevelopment to remove eyesore. Need to get housing mix right and provide two car parking spaces per household to avoid parking problem in the area.
- **Greater Greyfriars**
Support uses in current planning document.
- **BT Site/ British Gas Site**
Bristol Road Protect the canal from pollution.

A total of 26 sites were either submitted by the development industry or identified the local community as locations/sites that would benefit from development, redevelopment or regeneration.

How did the comments inform the next stage of the GCP?

The comments raised at this stage of the consultation were used to inform the next two stages of consultation, which looked at different elements of the GCP.

The first was Part 1, which focussed on the context and key principles to underpin the GCP and was held in 2012. This drew on responses relating the strategy issues the key principles for consideration in the GCP.

Where relevant to the GCP and a subject that should be covered at that level, the responses helped feed into the evidence necessary to prepare a draft strategy and the key principles that the GCP should seek to address, based on the understanding of issues and opportunities. For example, comments relating to/supporting the need for regeneration in Gloucester City Centre, fed into Key Principle 1 of the Part 1 consultation, which stated 'To

ensure development contributes to delivering a transforming City, which brings regeneration benefits, promotes sustainable development and reduces the need for greenfield development by making the most efficient use of previously developed land and building', and Key Principle 3 'To continue the City's longstanding strategy as set out in previous planning documents of delivering on a City Centre first approach. This will be delivered through the primacy of King's Quarter redevelopment. This forms the City's priority regeneration site for delivering a step-change in its retail performance and an improved City Centre environment. It will also act as a catalyst for the wider regeneration of the City Centre. Development will not be supported where it will have a demonstrable negative impact on the City Centre and its regeneration.

Another comment raised the need to clearly set out how the emerging JCS and GCP fit together, which is subsequently explained in the first few pages of the Part 1 consultation. However, given the early stage of plan-making at that time, it wasn't possible to more clearly set out a holistic overview.

Many of the strategy comments at this stage related to the different growth options outside of the city, for example in relation to the Council's aspiration to grow to the north, and pros and cons of different areas of potential growth, and the necessity to grow elsewhere given unknown development needs at that time. In this regard, some sites were promoted that were not in Gloucester City's administrative area. These comments were considered as part of the emerging spatial strategy of the Joint Core Strategy.

Part 2 of the GCP focussed on the city places, sites and a city centre strategy. This consultation was undertaken in 2013 and looked more closely at different development opportunities in the city and their allocation for different uses. Those sites that had been submitted as new opportunities as part of the Scope consultation were assessed as part of the City Council's Strategic Housing Land Availability Assessment (SHLAA) and Strategic Employment Land Availability Assessment (SELAA) – which have now been merged into one Strategic Assessment of Land Availability (SALA). Where suitable, these sites were then included in this consultation of potential development opportunities, further considered at later stages of plan-making.

The full response report is provided at Appendix 2.

Appendix 1B: Part 1 Gloucester City Plan: Context and key principles (2012)

Part 1 of the GCP took forward the responses from the Scoping consultation and presented a range of different challenges the plan should seek to address, an indicative strategy 'Going for growth' and 13 Key Principles to deliver the strategy. The consultation sought feedback on the challenges, strategy and key development principles in order to inform the next stage of the plan.

The questions asked were as follows:

1. Do you agree with the general strategy identified for dealing with the key challenges? If not, what alternatives would you like to see?
2. Do you agree with the key challenges identified? If no, what alternatives would you like to see?
3. Do you agree with the key development principles identified to deliver the strategy? If not, what alternatives would you like to see?
4. Do you have any further comments to make?

Consultation was held for six weeks during March and April 2012.

What were the main issues raised?

In total, 67 representations were received.

To summarise the responses to each of the questions:

Do you agree with the general strategy identified for dealing with the key challenges? If not, what alternatives would you like to see?

- Support for growth to the north of the city, given existing connections and the opportunity that new communities in those areas would bring to supporting regeneration initiatives. However, it also needs to be recognised that there are other areas, such as Winnycroft, that are located on the edge of the city, such as Winnycroft to the east. It also needs to be acknowledged that growth will happen to the south of the city at Hunts Grove, in Stroud District Council's administrative area.
- Support for the general principle of 'going for growth', with Gloucester being a principal location for jobs, new homes and development. It is important that this is progressed in a way that protects the city's important built and natural environment, including assets such as Robinswood Hill and Alney Island. It is also important that significant constraints such as flood risk, and the River Severn flood plain are properly considered.
- Support for the focus on regenerating Gloucester City and progressing the regeneration of sites in a coordinated manner. Support also for the identification of Kings Quarter as the Council's regeneration priority.
- It was noted that the new National Planning Policy Framework (NPPF) had recently been published and the importance of enduring conformity with its principles and requirements.
- It was noted that there is an opportunity for community benefits from development in more deprived communities, for example through the provision of open space or community facilities.
- Support was expressed for the 'city centre first principle', but that this should now prevent retail development occurring in other locations where it would support a need (i.e. not all retail development would be appropriate for city/town centres).

- It was commented that the historic environment should be seen as an opportunity rather than a liability. The plan should set out a positive strategy for the conservation and enjoyment of the historic environment. Particular improvements would be welcomed within the Cathedral precincts.
- Concern was expressed that the identified strategy appears to deal with issues outside of the Council's administrative area – it does not need to be concerned with the location of strategic allocations beyond the city's boundary.

Do you agree with the key challenges identified? If no, what alternatives would you like to see?

- Overall, there is support for the identified key challenges facing the city.
- Support that the City's retail offer, economic base, cultural facilities, quality of connections, visitor management and public realm will be improved. This is supported by the NPPF.
- The statements regarding the need to improve arrival points and connectivity apply also to those areas on the edge of the city, for example the proposed Hunts Grove development, albeit it is outside of the city's administrative area. The A38 'Eastern Avenue' should also be referred to.
- Brownfield development sites should be promoted before greenfield sites.
- Request for the plan to build in greater flexibility for the alternative use of employment sites.
- It will be difficult to deliver growth whilst protecting the natural and historic environment.
- It was commented that at the time of the consultation the final housing requirement of the JCS was still being determined, but that it should be at the higher end of the options in order to deliver for needs.
- It was commented that the GCP needs to focus on issues within the administrative area of the city to remain distinct to the JCS.
- It was noted that the need to apply the city-centre first approach to retail developments should be made clear. Regeneration of the city centre is key to the success of Gloucester.

Do you agree with the key development principles identified to deliver the strategy? If not, what alternatives would you like to see?

- General support expressed for the key development principles identified.
- Support for the role of trees in promoting the natural environment, supporting biodiversity and mitigating and adapting to the implications of climate change. Also, for making the best use of previously developed land.
- Key development principle 3 should be toned down or removed to balance regeneration of the city centre without detrimental effect to the wider City Council area. Another comment suggested it should be made clear this doesn't apply to all development, as the key principle suggests.
- There should be a separate key principle that takes a 'whole economy' approach to employment development that includes non-B use employment generating uses.
- Suggest that Green Infrastructure Strategy is prepared as part of the plan.
- With the level of development proposed it will be important to include leisure and sport as community facilities, along with health services, etc.
- Housing requirements will need to be updated to accord with the JCS once in a position to do so. The GCP should not seek to address issues that are outside of the administrative area.
- It was commented that flood risk, sustainable development, SuDS, biodiversity and ground water protection should be more fully referenced. Climate change should

permeate the whole policy base, and the plan should seek to reduce dependency on fossil fuels, reduce carbon emissions, secure sustainable construction methods, aims for the highest possible standards and embed resilience and adaptation to climate change.

- There is an inconsistency between the stated development strategy of growing to the north and delivering a 'connected city'.
- Concern that there could be an over-supply of employment land in Gloucester City, which is unlikely to change over the next few years.
- For key principle 3 support was expressed for the primacy of the King's Quarter development, but that it should be expanded to state that developments will not be supported where it would have an adverse or negative impact on planned or committed investment.
- Policies around housing in affordable housing need to reference viability.
- It was commented that greater emphasis needs to be made to encouraging city centre living.

Do you have any further comments to make?

- Concern expressed regarding the potential loss of sports facilities.
- The Vision doesn't express a sense of place or set out a clear vision for how the city will change over the next 20 years.
- The GCP needs to focus on delivery and ensure that policies and allocations are flexible enough to stimulate delivery, particularly in current challenging economic circumstances.
- GCP needs to encourage pedestrian-friendly connectivity between the bus station and train station.
- Don't make the same mistakes as before e.g. the Jellicoe Plan of the 1960's.
- The next version of the GCP, which will focus on sites, should coincide with the JCS confirmation of development requirements.
- The GCP needs to be prepared with the Stroud Local Plan in mind, and the need to address the duty to cooperate.
- General comments about what respondents would like to plan to deliver – e.g. a healthy city, a quality athletics track, nightlife/quality dining, high quality developments.
- Green infrastructure should be more aligned to infrastructure provision.
- The GCP should not be progressed in the advance of the JCS.

Other comments

- Support for regeneration, infrastructure and housing development from NHS Gloucestershire. Safe, affordable, warm housing is essential for health and wellbeing.
- Evidence shows the importance of design and layout of community and associated infrastructure on health and wellbeing.
- Department of Health has recognised the importance of delivering care closer to home and NHS Gloucestershire has been investing in primary healthcare facilities to ensure that people can access services close to home and to minimise waiting times.
- Must ensure that transport infrastructure and services are improved for all the City's residents and in line with the housing growth.
- Waterwells Business Park - two general requirements to encourage the delivery of this development should be incorporated. Firstly, the full range of employment uses (B1, B2 and B8) would need to be specified. Secondly, in order to address the high costs of infrastructure to serve this particular land, particularly at a time when development of employment land is not a market priority would need to be addressed

by including an element of enabling residential development in the allocation of the land.

- Clear need for affordable housing and housing for older people. Housing delivered should provide for all needs.
- Policies for site allocations on brownfield land should recognise and protect their ecological interest.
- Green Infrastructure should be strategically planned.
- Consideration needs to be given to likely significant effects on European sites, alone or in combination.
- Planning policy needs to make provision for and protect sports developments.
- Vision does not acknowledge other key challenges facing the City, such as providing sufficient homes to support an expanding population and the need to identify suitable development sites in deliverable and sustainable locations.

How did the comments inform the next stage of the GCP?

Comments made at this stage of the process fed into the Draft Gloucester City Plan. Many of the comments supported the City Council's approach in terms of the general strategy, key challenges and key principles and so these were carried forward to the next stage of plan-making. These included 'going for growth', regenerating the city centre, applying a city centre first approach and making the best use of brownfield land.

Some respondents objected to the perceived 'blanket' application of the 'city-centre first principle' but it was considered necessary to progress this approach, where necessary, to support regeneration, vitality and viability and safeguard investment in regeneration proposals.

Various important matters were raised that should be addressed through local plans, for example in relation to Green Infrastructure, employment land, sports facilities, flood risk and SuDS. In these circumstances, the JCS provides a high-level policy approach, but the Draft GCP sought to strengthen the approach at the city-wide level. With regard to Green Infrastructure (GI), the strategic policy approach in the JCS is supported by the GI Strategy, showing how GI should be delivered on a cross-boundary basis. Further evidence was also prepared in the form of a Playing Pitch Strategy (adopted 2016) (and more recently, a Built Facilities Strategy, 2019).

It was accepted that at this stage the vision wasn't clear and didn't express a sense of place. This was subsequently pulled together to reflect something more appropriate, which was included into the Draft GCP for further consideration.

At the time this consultation was published, the new National Planning Policy Framework (2012) had been released, and so respondents rightly pointed out that it would be necessary for the GCP (and JCS) to conform with this new planning policy. The Draft GCP clearly identified the main linkages between the JCS and NPPF in order to provide clarity to the reader.

Some comments were also relevant to the emerging JCS, for example in terms of strategic areas of growth and development opportunities outside of Gloucester City's administrative area and were subsequently addressed at that level as part of the JCS partnership and under the duty-to-cooperate.

The full response report is provided at Appendix 3.

Appendix 1C: Part 2 Gloucester City Plan: Places, sites and City Centre Strategy (2013)

Part 2 of the GCP began the process of consulting on development need and opportunities based on a range of known sites. It also considered issues and opportunities on ward-by-ward basis and presented a City Centre Vision and Strategy. Consultation was held between 13th May and 12th July 2013.

To frame responses a questionnaire was prepared, that followed the structure of the consultation document. The questions were as follows:

- Development needs and context: The City Plan needs to set out the development needs of the city. Are there specific needs you think should be addressed in planning the future of the city?
- City Centre: The consultation document sets out that the city centre should seek to deliver a number of key principles. Do you have any comments on these?
- Primary Shopping Area, Primary Frontage and Secondary Frontage: The consultation document proposes to define how shopping development will be managed within the city centre. Do you have any comments on this?
- Proposals for development outside the primary shopping area: The consultation document proposed how retail developments will be managed where proposed outside of the main shopping areas. Do you have any comments on this?
- City Centre boundary: The consultation document sets out a boundary for the city centre for your views. Do you have any comments on this?
- Housing development in the city centre: The consultation document sets out how the Council can support new housing in the city centre. Do you have any comments on this?
- Development opportunities: The consultation sets out by area on the city (ward) a number of potential development opportunities. Do you have any comments on any of these or wish to put forward other sites?
- Sustainability Appraisal: The Council has published a Sustainability Appraisal Report alongside the City Plan consultation and your views are invited on this also.

To raise awareness of the consultation the following was undertaken:

- Publication on the City Council website
- Notifications to statutory, stakeholder consultation bodies (Appendix 6) and general consultation database.
- Press notice
- Press release
- City Life magazine article (city-wide distribution)
- Social media posts
- Hard copies of all consultation documents in deposit locations, the Guildhall and Tourism Information Centre.

A total of 18 consultation events were held, at least one in each ward/parish, lasting for three hours. The consultation events were independently facilitated by Gloucestershire Rural Community Council (GRCC), a local expert in community consultation. The events were held as follows:

- St Lawrence Parish Church (Barnwood ward)
- Finlay Community School (Matson and Robinswood)
- Quedgeley Community Centre (Quedgeley ward/Parish Council)

- Hucclecote Community Centre (Hucclecote ward)
- Abbeydale Community Centre (Abbey ward)
- St Luke's Community Church (Moreland ward)
- Hempsted Village Hall (Westgate ward)
- Tuffley Community Centre (Grange ward)
- St Barnabus Church Hall (Tuffley ward)
- Barton Community Centre (Barton and Tredworth)
- Kingsway Community Centres (Quedgelet ward/Parish Council)
- Longlevens Community Centre (Longlevens ward)
- The Ramblers Community Hall (Podsmead ward)
- Kingsholm and Wotton Community Centre (Kingsholm and Wotton ward)
- St Mary's Congregational Church (Westgate ward)
- Barnwood Community Fay (Barnwood ward)
- Redwell Centre (Matson and Robinswood ward)
- Lonsdale Methodist Church Hall (Elmbridge ward)

What did the responses say?

In total, 297 individual comments were received.

City centre strategy and policy options

General direction of travel: There was support for the general thrust of the City Centre Strategy given that it provides a firm commitment to improving retail, leisure, culture, business and entertainment in the city.

Relationship between the City Centre and Gloucester Quays: Concerns were raised regarding the relationship between the City Centre and Gloucester Quays. Some representations expressed concern that the popularity of Gloucester Quays undermines the City Centre and that there is a need to ensure that they complement rather than compete with one another. Comments were made about the need to improve linkages.

Retail & leisure offer: Comments focused on the need to encourage a wider range and a better mix of shops in the City Centre, for example quality independent shops rather than chain or bargain shops. There were suggestions that the night-time economy needed to be improved and that the existing offer was lacking. There were suggestions that more should be done to encourage outdoor events in order to bring people into the city. There were suggestions that Gloucester needed a central theatre to rival the Everyman in Cheltenham. Other comments focused on the need for a drive to increase a greater variety of outlets in the 'gate' streets as well as Gloucester Quays.

Objectives: There was general support for the Objectives. On Objective 3 'To draw on Gloucester's strengths as an historic city to create a hub for culture, tourism and leisure.' a suggestion was made to specifically reference historic buildings of which there are many in the City Centre. On Objective 5 'To deliver a sustainable mix of complementary city centre uses which ensure vibrancy throughout the day and evening.' it was suggested that this should be based on a significantly increased local residence presence. On Objective 6 'To improve linkages within the city centre, encouraging the use of sustainable modes of transport whilst providing well located car parking.' it was suggested that this should be more specific and focus on walking, cycling, public transport and use of the canal and river as potential transport options.

Primary shopping area and primary and secondary frontages: There was general support for the identified areas, which have been expanded to include the King's Quarter.

There was a suggestion that the proposals map should identify 'frontages' rather than 'zones'. There was an objection to the inclusion of all secondary frontage in the primary shopping area, which is contrary to the NPPF.

City Centre boundary: There was a variety of responses to the City Centre boundary. Some respondents stated that the boundary, as drawn is too large. Some agreed that the proposed extent was appropriate. There were suggestions that the City Centre could be zoned into areas with similar uses e.g. the historic centre. There were objections to the City Centre excluding Gloucester Park which was considered an integral part.

Residential development in the City Centre: There was support for a policy approach that supports residential development in the City Centre. This would improve and support the vitality and viability of the centre. Some comments focused on the importance of ensuring that development is appropriate for both older and younger people, is of high-quality design, appropriate to the area (design) and makes appropriate and timely contributions to investment in infrastructure.

Sequential test/impact test: There was strong support for the proposed policy wording, requiring the assessment of proposals for retail development not in the City Centre against the sequential test and impact test. This helps to support the primary shopping area and ensure that the most is made of public transport services. There was a suggestion that out of centre retail is not too problematic as long as there are good public transport facilities.

Heritage: Comments included those that considered more should be done in the City Centre to make the most of Gloucester's heritage, which is currently under-utilised. It was felt by some that there is a need for more tourism infrastructure e.g. hotels, coach parking, car parking. There was a request for Strategy bullet 11, to include more explanatory signage and interpretation.

Connectivity: Comments included those calling for improve connectivity between the Docks and the City Centre. Other comments stressed the need to improve the connectivity with the mainline railway.

Sites and areas

There was general support for the allocation of the **city centre opportunities** (Westgate ward north) and for the Council's leading role in taking forward regeneration. Some suggestions were made for alternative uses within some of the larger sites, for example consideration of a new library and theatre in King's Quarter. Concern was expressed that any developments within the wider city centre should not undermine the health (vitality and viability) of the primary shopping area. It was suggested that The Docks area should be broken down to identify Southgate Moorings as a separate development opportunity. The need to address flood risk and highways impact arising from the developments was also raised, as well as the need to consider the economic viability of potential sand and gravel resources.

In **Kingsholm and Wotton ward**, Hare Lane North Car Park, 67 – 69 London Road and Wessex House received no comments. General support was received to the proposed allocations for the former Telecom House and Great Western Road Sidings. The Civil Service Club received a mix of responses, with some objecting to the principle of the development and the loss of sports, whilst the developer supporting the proposal. An alternative allocation was suggested, safeguarding more of the site for sports development. More generally, the needs to address highways impact was raised, including the impact of development at Great Western Road Sidings on the nearby level crossing. The need to consider the economic viability of potential sand and gravel resources was also raised.

In **Matson and Robinswood ward**, there were a mix of responses, both supporting and objecting, to the potential development opportunities at Land at Corncroft Lane' and 'Winnycroft Farm'. The greenfield sites are located adjacent to each other and it was suggested they should be considered as a strategic allocation through the Joint Core Strategy. For both, it will be important to consider the impact on the strategic road network, local accident hotspots, biodiversity and Key Wildlife Sites.

In **Abbey ward**, concern was expressed for the loss of wildlife/biodiversity from land adjacent to Abbeydale District Centre which was overgrown, also the impact on parking from the development of the site. The main issues regarding Land at the Wheatridge are the general lack of open space in the local area and the loss of habitats for urban wildlife. Concern was also expressed regarding the impact on local infrastructure.

In **Barnwood ward**, concerns were raised regarding the identification for Land North of Walls and the Royal Mail Distribution Centre for B Use employment purposes, instead requesting a wider range of allocated uses. In this regard, it was considered that a higher value use would be required at Land North of Walls to support the necessary highways improvements. Various points of clarification, for example in relation to the size of the site were raised. Confirmation was provided that the Fire Station on Eastern Avenue had been sold and was no longer available.

In **Barton and Tredworth ward**, there was a call for more to be made of the City Farm, to attract more visitors to the area.

In **Elmbridge ward**, the only development opportunity was Helipebs, a functioning employment site. Concern was expressed over the complexity of the brownfield site, for example in relation to contamination. The deliverability of the site within the plan period was also questioned given the site was fully occupied and therefore leases will be in place. Consideration would need to be given to the impact on the highway network.

In **Longlevens ward**, it was suggested the former Bishops College site should be protected for educational purposes, given the proximity of proposed JCS strategic allocations to the north of the city. In this regard, better connectivity should be between the proposed City Plan and JCS sites. Both the former Bishops College and Land off Leven Close include playing fields, and in this regard, it is important to ensure the City Council's Playing Pitch Strategy is kept up to date. For both sites, it was suggested the extent and economic viability of sand and gravel resources must be assessed.

In **Quedgeley Severn Vale ward**, a comment was raised regarding Clearwater, in that the proposed partial development of the site would help ensure the nature conservation assets are managed and enhanced for the long-term. Regarding Land East of Waterwells, support was expressed for residential development in this area, or for its deallocation. The owner of Lynton Fields confirmed the site's available for commercial or residential purposes. Consideration must be given to the impact of development on the highway network, including Junction 12 of the M5.

In **Tuffley ward**, concern was expressed regarding the development of Land South of Grange Road, in terms of landscape, flood risk and the highways network (including the strategic road network) and community infrastructure. The area is rural in nature, good agricultural land and should stay that way. It was also considered that this site has a relationship with strategic sites being considered through the JCS (Brookthorpe with Whaddon) and that they should be considered together. Support was also expressed from the development/landowner.

In **Westgate ward south**, concern was raised to the description of Hempsted as being a 'part of the wider city'. Concern expressed regarding development leading to a loss of community cohesion, impact on highways and local infrastructure and services, the loss of green space, loss of views and the village character. Support was expressed for redevelopment of the brownfield site at the former oil storage depot, whilst in contrast there was also objection for the reasons set out earlier. Likewise, support was expressed for the South West Bypass site, but objection on the basis it would block a view to green space and represent over-development.

Strong objection was expressed with regard to Land East of Hempsted Lane, Land at Rectory Lane and Land at Rea Lane for the reasons set out above. Limited support for Land East of Hempsted Lane for small-scale development and open space.

Other site opportunities were also submitted at this stage, including land at the rear of the former Cattle Market, former Kwiksave site (City Centre), Bakers Quay, land at Unilever (Barnwood Point - redevelopment), the Peel Centre, Madleaze Industrial Estate and Land at Whaddon (Stroud District).

How did the comments inform the next stage of the GCP?

The comments raised through this consultation were considered and informed the Draft GCP.

Overall, there was support the Council's proposed approach towards the City Centre. Some concern was expressed regarding the relation between the City Centre and Gloucester Quays, and the risk that the latter could undermine the former. The City Council's response to this was that Gloucester Quays is subject to a condition that controls what can be sold from the units to safeguard against this from happening.

Some suggestions were made for changes to the different objectives, but overall felt it wasn't necessary and in some cases result in something that was too specific.

Regarding the Primary Shopping Area and primary and secondary shopping frontages, it was noted that the policies map should identify 'frontages' rather than 'zones'. This was agreed and the change subsequently made. Other comments were made in relation the extent of the city centre boundary, the inclusion of zones and Gloucester Park. It was not felt this was appropriate and a commitment to review the extent of the boundary made to inform the Draft GCP.

It was considered more should be made of the city's heritage and tourism infrastructure. A commitment was made to address this through the development management policies of the Draft GCP, which was subsequently undertaken.

Overall, there was strong support for most of the city centre sites identified, which also form regeneration sites, albeit some suggestions for alternative uses that could be considered.

Generally, some concern was expressed regarding the suitability of potential allocations regarding constraints such as flood risk, contamination, impact on biodiversity, landscape or the historic environment. In circumstances such as these, the issue was considered further through either internal screening/consideration by officers, for example historic environment and contamination.

Where necessary, and at the appropriate time, a commitment was made to commissioning consultants to provide evidence in relation to the potential impact and mitigation options for impacts from development such as flood risk and transport. In most cases this was

commissioned following the completion of the Draft GCP consultation in order to reflect the Pre-Submission GCP.

The City Council's Playing Pitch Strategy was progressed and adopted In January 2016 to provide the evidence necessary to inform a decision as to the future of the Civil Service Club and L1 'Bishops College site' and L2 'Land off Leven Close' as sites either wholly or partly playing fields.

Where objection was raised to the identification of a greenfield site, the Council made a balanced judgement on the appropriateness of the site allocation in light of constraints when considered against the level of housing need. The sites at MR1 'Land at Corncroft Lane' and MR2 'Winnycroft Farm' were later allocated as part of the Joint Core Strategy.

In relation to Land East of Waterwells Business Park, four different options were put forward for further comment. A mix of responses were received, with one stating a parcel of land is available for either commercial or residential, another supporting no allocation, and another supporting a mix. On balance, the City Council considered the most appropriate approach would be to progress a mixed-use allocation for employment to the northern area, and residential to the southern area, to protect the amenity of existing residential dwellings, and provide a more appropriate gateway to the Hunts Grove development to the south in Stroud District.

Where doubts were cast over the deliverability of potential site allocations, further work was undertaken with the landowners/developers, to establish the deliverability of the sites.

Between the publication of the Part 2 consultation and completion of the response report, some sites were granted planning permission.

The full response report is provided at Appendix 4.

Appendix 1D: Draft Gloucester City Plan (2017)

The Draft GCP presented the full plan for consultation in its entirety, informed by the previous three consultations and the emerging evidence base. It includes a draft Vision, Key Principles, proposed site allocations, draft development management policies and a Policies Map. The formal consultation lasted for six weeks between 16th January and 27th February 2017. Under each of the proposed site allocations, a summary of the main issues raised in previous consultations was provided.

To raise awareness of the consultation the following was undertaken:

- Publication on the City Council website
- Notifications to statutory, stakeholder consultation bodies (Appendix 6) and general consultation database
- Press notice
- Press release
- City Life magazine article (city-wide distribution)
- Social media posts
- Hard copies of all consultation documents in deposit locations.

Furthermore, six public consultation events spread across the city in order to provide equal coverage and provide an opportunity for as many people as possible to engage in the process. The events included a public exhibition and officers were on hand to answer questions and generate feedback. The public events were as follows:

- Kings Walk Shopping Centre: Two events were held in a vacant shopping unit in the heart of the city, between 10am and 4pm.
- Sainsburys Gloucester Quays: One event between 8am and 3pm, using the City Council's consultation minibus.
- Tesco Quedgeley: Once event between 10am and 3pm, using the City Council's consultation minibus.
- Morrisons Abbeydale: One event between 8am and 3pm, using the City Council's consultation minibus.
- St Oswald's Extra Care Village: One event between 10am and 4pm, using an exhibition in the main reception area.

Further internal sessions were held for officers and elected Members in order to raise awareness and generate feedback. These were held in meeting rooms during the working day.

The consultation itself didn't ask specific questions but instead sought feedback on the Draft Plan's content and the evidence. In total, 64 representations were received, amounting to 267 comments.

What did the responses say?

In general, some people felt that the City Plan repeated the JCS while others did not understand the relationship between the two plans. There were a number of useful comments made regarding the style of policy writing and consistency of language.

Housing comments

Several comments referred to the shortfall of housing with some requests for more sites to be allocated. Some felt that the City Plan should not have an affordable housing policy,

where others felt it should do more to address affordable housing need to ensure everyone has a decent and truly affordable home.

There was a request for the City Plan to have a policy around Houses in Multiple Occupation. Calls for further evidence base regarding affordable housing, housing mix and the inclusion of the higher optional accessible and adaptable home standards were made.

A comment was received around making A8: Self build more comprehensive to include custom build.

Economic development comments

Comments were received stating the importance of the waterways and the sports and leisure industries to the economy. Several comments were received stating that B1: Employment and Skills Plan was unreasonable, excessive and unnecessary. There was some unease regarding the protection of employment sites whilst others wanted such sites retained and reutilised for smaller scale units with a mixed-use element.

Retail and city/town centres

There was support for the protection of the City Centre and concerns raised over increasing competition from out-of-centre shopping and the amount of development taking place at Gloucester Quays. Many of the comments received are to be dealt with as part of the JCS review.

It was felt that heritage could play more of a role and several ideas were put forward to promote tourism and culture.

Health and wellbeing

There was strong support for this chapter and the reference to both physical and mental health were welcomed. Comments were received asking for more to be done for green routes and active travel especially cycling improvements and making use of the waterways and towing paths for leisure. There was also a call to do more to commit to the protection of woods and trees given the benefits they bring to mental health and air pollution. Respondents also wanted the plan to do more to encourage electric car and bus use. A request was also received to create a 'changing places' toilet policy.

It was stated that D4: Allotments was not properly evidenced, or viability tested. Further evidence was also requested to support D14: Cordon Sanitaire.

The NHS expressed concern that Policy D8: Community Facilities may prevent them disposing of their sites for other uses.

The Samaritans, Gloucestershire Public Health and Gloucestershire Suicide Prevention all offered strong support to policy D15: Suicide prevention.

Historic environment

There were high levels of support from Historic England but with a request to provide a positive clear strategy for the conservation, enjoyment and enhancement of the historic environment.

Natural environment

Natural England raised concerns over the impacts to the Cotswold Beechwoods, while others generally felt that there was a good range of policies for the protection and enhancement of the natural environment. A number of respondents felt that the biodiversity policy and trees and hedgerow policy could go further. Woodlands and orchards were specifically mentioned as an area for improvement. It was pointed out that biomass is no longer considered environmentally friendly. It was also highlighted that a key issue for Gloucester will be resilience to the impacts of climate change on flooding from all sources within the urban area and where this bounds the River Severn floodplain. One response identified that there were some key local wildlife sites missing. There was some confusion over the Green Infrastructure plan for the JCS and the County Council. The Environment Agency raised a number of points for clarification and amendment.

Design

There was general support for the policies as they ensure good design except for Policy G8: Public art which received a number of objections and was not supported. A request was made for a policy relating to open plan estates and boundary treatments. Helpful suggestions were made around phrasing and perceived repetition of JCS policies. It was suggested that Policy G17: Views of the Cathedral was moved to the Historic Environment chapter.

Sustainable transport

There were several comments relating to rail, bus services, use of electric vehicles and existing cycle infrastructure that are beyond the remit of the plan. The Canal and River Trust were promoting improve connectivity and enhancements to the towing paths as sustainable transport routes. There was a request from Highways England for additional evidence base.

Infrastructure

A request for sports and play areas to cater for disabled children and young people was made.

Sites

There were a number of objections from residents regarding the proposed allocations. Notably SA01: Land at the Wheatridge, SA02: Barnwood Manor, SA06 Former Civil Service Club, SA10: Land off Leven Close, SA14: Clearwater Drive, SA22: Secunda Way Industrial Site, and SA23: Rea Lane.

How did the comments inform the next stage of the GCP?

Through the JCS examination, the policy content of JCS changed and it was necessary to amend to GCP to reflect that. For this reason, retail and city/town centre matters were not progressed in the GCP, instead being addressed at JCS level. This is set out at Policy SD2 of the Adopted JCS, with a commitment to a review, which is underway.

In response to the consultation further evidence base was published including Phase 1 Habitat Surveys, Gloucester Heritage Strategy 2019, Gloucester City Plan Viability Report 2019, Cordon Sanitaire Evidence Study 2019, Townscape Character Assessment 2019, Strategic Flood Risk Assessment Level 2 2019, Flooding Sequential Test 2019, and the Gloucester City Plan Transport Assessment. Background topic papers were also published on housing, health and wellbeing, and employment.

Conversations continued with statutory consultees and key stakeholders.

In the next stage of the plan more was made of climate change and the natural environment to reflect the comments received on green infrastructure and the canal and river. A new policy, B4: Development with and adjacent to Gloucester Docks and Canal, was developed. The previous policies on Biodiversity and Geodiversity were merged and additional reference to ecological networks and net gain biodiversity included. Policy E3: Protection of Trees and Hedgerows was also expanded to include woodlands and to include a requirement for measurable net gain. The Air Quality policy was expanded to incorporate the significant role green infrastructure can make to air and dust pollution. A number of policies to help reduce carbon and contribute to fighting climate change were developed including G2: Charging infrastructure for electrical vehicles, G3: Cycling, and G4: Walking.

A new policy E8: Development affecting the Cotswold Beechwoods SAC was developed to address concerns raised by Natural England regarding the HRA and the likely significant effects through increased recreational disturbance.

Other new policies that were developed as a direct result of the consultation include policy C8: Changing Places Toilets, and G6: Open Plan Estates.

Policy D1: Active design and Policy D3: Accessibility were combined to create Policy C1: Active Design and Accessibility. The supporting text includes reference to making playgrounds accessible as requested through the consultation. A new policy, A1: Effective use of land and buildings, pulls together a number of previous policies (Policy A3: Sub-division of plots for infill, Policy A4: Intensification of use of existing dwellings, Policy A1: Use of upper floors for residential) and dealt with the matter of the intensification of homes and multiple occupancy, whilst seeking to ensure the best possible use was made of development opportunities.

A number of policies such as G8: Public Art, G10: Delivering strategies, G11: Development alongside main routes, G12: Design Standards, G13: Large scale 20th Century Buildings, G14: Transport Arrival Nodes, G16: Design and Climate Change were removed as respondents pointed out that they were too general or covered elsewhere.

Many suggestions around phrasing of policies were taken forward and have contributed to making a more positive plan.

Following the completion of the consultation, representations were reviewed, and a consultation response report prepared. This provided a summary of the responses received and a response setting out how the comments would be taken forward in the Pre-Submission version of the Plan.

The full response schedule is provided at Appendix 5.

Examples of consultation activity

Letter sent to consultees

13 January 2017

Dear Sir / Madam,

I am writing to you because your details are on the City Council's planning consultation database as someone who has either requested to be notified when planning consultations are published, or you have responded to planning consultations in the past.

The City Council has published the draft Gloucester City Plan (GCP) for six weeks of public consultation between 16th January and 27th February 2017. The document sets out:

- *A draft vision and key principles for development in Gloucester;*
- *Draft planning policies that reflect and address the local issues and opportunities in the City that, once 'adopted' by the Council, will be used to inform planning proposals and assess planning applications; and*
- *Proposed site allocations for different types of development.*
The consultation also includes a targeted 'call for sites'. In this regard, the community, landowners and developers are invited to submit to the City Council potential development sites. These will be assessed for their development potential and could be included in the next version of the GCP.

The consultation is published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Accessing the consultation

The consultation document and all supporting information is available to download from the City Council's website at www.gloucester.gov.uk/cityplan. Hard copies have also been made available at the City Council reception in the Docks, all Gloucester libraries and the Guildhall. In addition, the Council is holding five public consultation events. You are welcome to come and visit the team at any of the following:

- *Wednesday 25th January; Sainsbury's Gloucester Quays, 9am - 3pm*
- *Saturday 28th January; King's Walk Shopping Centre, 10am – 4pm*
- *Tuesday 7th February; King's Walk Shopping Centre, 10am – 4pm*
- *Saturday 11th February, Tesco Quedgeley, 10am – 3pm*
- *Friday 17th February, Morrisons Abbeydale, 9am – 3pm*
Those at Kings Walk Shopping Centre will be held in a vacant unit. For those at a supermarket officers will be in the 'Hello Gloucester' minibus in the car park.

Responding to the consultation

You are strongly encouraged to respond via the Council's dedicated and easy to use online consultation system – available to access from the web link above. Using this system saves time and cost for the Council when processing comments.

However, if you would prefer, response forms can be downloaded from the website and paper copies picked up from any of the locations mentioned above. Once completed, they can be either emailed to cityplan@gloucester.gov.uk or posted to Planning Policy and Heritage Team, Herbert Warehouse, The Docks, Gloucester, GL1 2EQ.

Responses must be received no later than 5pm on Monday 27th February 2017.

Consultation database

Consultation on emerging planning documents is important and the City Council is keen to ensure that those who want to be a part of this process get that opportunity. Equally however it

is important that this process is undertaken in an efficient and cost-effective way and that the contact information held is as up-to-date as possible.

With this in mind, we would be grateful if you could contact the team if your details are incorrect or if you wish to be deleted from our database. Furthermore, if you have received this notification by hard copy letter, please let us know your email address so that we can send you emails in the future.

Please note that your personal information will be held and used by the City Council solely for the purposes of preparing emerging planning policy and will not be provided to any third parties.

Further information and contacts

More information in relation to the GCP is available from the website at www.gloucester.gov.uk/cityplan. However if you have more specific questions please contact a member of the Planning Policy and Heritage Team by emailing cityplan@gloucester.gov.uk or phoning the City Council switchboard on 01452 396396.

Yours faithfully,

Adam Gooch
Planning Policy and Heritage Team

Press release

Thursday 1st December 2016

Share your views on the Gloucester City Plan

Gloucester City Council is inviting members of the public to have their say on what areas in the city have potential for development and what criteria they'd need to meet.

The Gloucester City Plan delivers the Joint Core Strategy at a local level and sets out draft policies that reflect local issues and opportunities in the city. It looks at areas in the city that would be appropriate for development and growth to ensure that the council meets its development targets.

The city plan outlines a possible 23 sites across Gloucester that would be suitable for development and a further 70 policies that protect the environment and make sure that new developments contribute positively to the city's needs.

The council is asking its partners, businesses and local residents what they think of the possible sites and policies in the plan and if there are any others that could be considered.

Subject to council approval next month, a six week long public conversation on the city plan will launch on 16th January 2017.

Cllr Colin Organ, cabinet member for housing and planning, said: "It's really important that we hear from as many people as possible on this consultation. We will also be travelling around the city asking local communities to come and speak with us.

"Development is essential to the growth of the city, but it should also serve the needs of the community. Gloucester is a growing city and becoming an even more desirable city to live in, visit and work. We're hopeful that the plans outlined in this document will support this growth."

ENDS

Issued by Gloucester City Council media team, 01452 427553,
charlotte.merryfield@gloucestershire.gov.uk

Statutory notice

Notice of consultation on the Draft Gloucester City Plan Regulation 18: Town and Country Planning (Local Planning) (England) Regulations 2012

Title of the Plan

Draft Gloucester City Plan

Subject matter and area covered by the Plan

Gloucester City Council has prepared the Draft Gloucester City Plan (GCP) for a six-week period of public consultation. The GCP will deliver the Joint Core Strategy (JCS) at the local level but also provide a planning framework that reflects and addresses the local issues and opportunities in the City. It includes; a draft vision and key principle for development in Gloucester; draft planning policies that, once adopted, will be used to inform planning proposals and assess planning applications; and proposed site allocations for different types of development.

Period of publication for representations

Representations are invited in the Draft GCP for six-weeks between Monday 16th January and Monday 27th February 2017. Representations must be received no later than 5pm on Monday 27th February 2017.

Where to view the documents

The Draft GCP and other associated documents are available to view:

- On the City Council's website at www.gloucester.gov.uk/cityplan;
- At the City Council's offices at Herbert Warehouse, The Docks, Gloucester, GL1 2EQ.
- At all libraries in Gloucester (see <http://www.gloucestershire.gov.uk/libraries> for further information); and
- At Gloucester Guildhall.
- At any of the consultation events – see the website or contact us for further details.

How to make representations

Representations can be made online, by email or via post.

- The City Council has a dedicated online planning consultation portal, which is available to access at www.gloucester.gov.uk/cityplan.
- Electronic response forms are available to download from the City Council's website
- Hard copy response forms are available from the City Council offices, all libraries in Gloucester, at the Guildhall and at any of the consultation events.
- We would prefer you to use a representation form, however if you would like to write a letter or email, please ensure you reference clearly the element of the document you are referring to

All representations should be sent to the City Council by the deadline above. For full contact details see below.

Address to which representations should be sent

- Online representations can be made via the City Council's website at www.gloucester.gov.uk/cityplan.
- Electronic representations should be emailed to cityplan@gloucester.gov.uk.
- Hard copy representations should be sent to Planning Policy and Heritage Team, Gloucester City Council, Herbert Warehouse, The Docks, Gloucester, GL1 2EQ.
- You may also hand in completed response forms at any of the consultation events.

Further information

If you would like any further information, please visit www.gloucester.gov.uk/cityplan. If your query is more specific, please contact the Planning Policy and Heritage Team by emailing cityplan@gloucester.gov.uk, phoning the City Council on 01452 396396 or visiting one of the consultation events.

Events

Draft city plan NOW available for public consultation @kingswalk #Gloucester



 **GlosLiveOnline and 9 others**

07/02/2017, 10:25



Appendix 6: Statutory and stakeholder consultation bodies

Coal authority
Environment Agency
Historic England
Marine Management Organisation
Natural England
Network Rail Infrastructure Limited
Highways England
Gloucestershire County Council
Forest of Dean District Council
Stroud District Council
Cheltenham Borough Council
Cotswold District Council
Tewkesbury Borough Council
British Telecom
Vodafone
Virgin Media
Telewest
Gloucestershire Clinical Commissioning Group
Gloucestershire Hospitals NHS Foundation Trust
Gloucestershire NHS Health and Care Trust
NHS South Western Ambulance Service Trust
National Grid
Western Power Distribution
Wales and West Utilities
Severn Trent Water
Thames Water
Ministry for Housing, Communities and Local Government
Department for Digital, Culture, Media and Sport
Department for Farming and Rural Affairs
Ministry of Defence
Homes England

Other consultees

National / regional organisations

AGE UK
British Sign and Graphics Association
Campaign for the Protection of Rural England (CRPE)
Campaign for Real Ale
Canal and River Trust (formerly British Waterways)
Civil Aviation Authority
Defence Infrastructure Organisation
EDF Energy
Education and Skills Funding Agency
Forestry Commission
Federation of Small Businesses
Freight Transport Association
Friends, Families and Travellers
Great Western Railways
Health and Safety Executive
Home Builders Federation

Marine Management Organisation
Mobile UK (formerly Mobile Operators Organisation)
National Farmers Union
National Federation of Gypsy Liaison Groups
National Playing Fields Association
National Rail Property
National Trust
Office of Rail and Road
Sustrans
Ramblers Association
Royal Society for the Protection of Birds
Showmen's Guild of Great Britain
South West HARP Planning Consortium
Sport England
Theatres Trust
Woodland Trust

County / City organisations

Active Gloucestershire
Aspire Sports and Cultural Trust
Barnwood Community Partnership
Barnwood Trust
Barton / Tredworth Neighbourhood Partnership
Brockworth Parish Council
Bromford Housing
Brookthorpe with Whaddon Parish Council
Churchdown Parish Council
Cotswold Conservation Board
Diocese of Gloucester
Elim Housing
Elmbridge Neighbourhood Partnership
Elmore Parish Council
Friends of Alney Island
Gloucester Chamber of Commerce
Gloucester Charities Trust
Gloucester City Centre Community Partnership
Gloucester City Homes
Gloucester Civic Trust
Gloucestershire Association of Parish and Town Councils
Gloucestershire Constabulary
Gloucestershire Environmental Trust
Gloucestershire Football Association
Gloucestershire Fire and Rescue Service
Gloucestershire Lead Local Flood Authority
Gloucestershire First Local Enterprise Partnership (GFirst)
Gloucestershire Local Medical Committee
Gloucestershire Local Nature Partnership
Gloucestershire Orchard Trust
Gloucestershire Playing Fields Association
Gloucestershire Rural Community Council
Gloucestershire Voluntary and Community Sector Alliance
Gloucestershire Wildlife Trust
Green Square Group
Guinness Partnership

Hardwick Parish Council
Haresfield Parish Council
Hartpury College and University
Hempsted Residents Association
Highnam Parish Council
Hucclecote Community Association
Hucclecote Parish Council
Innsworth Parish Council
Kingsholm and Wotton Neighbourhood Partnership
Llanthony Secunda Priory Trust
Longford Parish Council
Longlevens Neighbourhood Partnership
Lower Severn Internal Drainage Board
Maisemore Parish Council
Minsterworth Parish Council
Muslim Community of Gloucester / Muslim Welfare Association
Podsmead Big Local
Quedgeley Town Council
Rooftop Housing Group
Roots Coffee and Community
Sanctuary Housing
Severn Wye Energy Agency
South Western Ambulance Service Trust
Sovereign
Stagecoach West
The Venture: White City CIC
Three Bridges Neighbourhood Partnership
Together in Matson
Two Rivers Housing
University of Gloucestershire
Upton St Leonards Parish Council
Young Gloucestershire

General contacts database

Developers
Planning consultants
Agents
Members of the community

Appendix 7: Policy changes between the Draft and Pre-Submission versions of the Gloucester City Plan

The following table provides a headline summary of policy made to policies between the Draft Gloucester City Plan (DGCP) and Pre-Submission Gloucester City Plan (PSGCP), including redrafting, amalgamation and new policies.

Policy evolution/changes – Reg.18 draft to Reg.19 version for consultation	
Pre-submission Policy	Headline commentary.
A. Housing	
Policy A1: Effective and efficient use of land and buildings	Merge of DGCP policies A1, A3, A4, G1, G2, G5, G6, to reflect new NPPF requirement re. density and address issues around intensification of neighbourhoods.
Policy A2: Affordable Housing	Created in order to provide clarity on the affordable housing requirement in Gloucester, building on Policy SD11 of the JCS and in response to new evidence.
Policy A3: Estate regeneration	Previously Policy A2. Additional criteria added in order to anticipate regeneration initiatives in City and to strengthen policy.
Policy A4: Student accommodation	Previously Policy A6. Additional criteria added to justify the need for purpose-built accommodation and safeguarding loss in response to new evidence.
Policy A5: Specialist housing	Previously Policy A7. Policy redrafted, additional criteria added based on new evidence.
Policy A6: Accessible and adaptable homes	Amended to reflect DGCP comments and to reflect new NPPF requirement.
Policy A7: Self-build and custom-build homes	Expanded to include custom-build, additional specific requirement for serviced plots to be made available
Policy A8: Static caravan sites	No significant change - minor amendments to strengthen policy.
Policy A9: Extensions to existing dwellings	No significant change - minor amendments to strengthen policy.
Policy A10: Annexes to existing dwellings	No significant change - minor amendments to strengthen policy.
B. Economic Development, Culture and Tourism	
Policy B1: Employment and skills plans	Change to threshold.
Policy B2: Safeguarding employment sites and buildings	Merge of previous employment policies and amended to reflect new evidence.

Policy B3: New employment development and intensification and improvements to existing employment land	Merge of previous employment policies and amended to reflect new evidence.
Policy B4: Development within and adjacent to Gloucester Docks and Canal	Created in response to DGCP comments from Canal and River Trust
Policy B5: Tourism and culture	Created in response to DGCP comments from the Culture Trust.
C. Healthy Communities	
Policy C1: Active design and accessibility	Merge of DGCP Policies D1 and D3, now refers to Sport England's 'Active Design' guidance (or future iteration).
Policy C2: Allotments	Previously Policy D4. Amended to reflect current position regarding opportunities to new allotments.
Policy C3: Public open space, playing fields and sports facilities	Merge of DGCP Policies D5, D6, D7 and amended to reflect Playing Pitch Strategy, Built Sports Strategy and Open Space Strategy.
Policy C4: Hot food takeaways	Previously Policy D9. Expanded to cover all forms of takeaway. Additional 400m exclusion zone around secondary schools/colleges (not including designated centres).
Policy C5: Air Quality	Previously Policy D10. Expansion to include new criteria and mitigation options to reflect the fact that Gloucester has several Air Quality Management Areas and congestion in a built-up urban area.
Policy C6: Cordon Sanitaire	Previously Policy D14. 'Constraints area' replaced with 'Cordon Sanitaire. New evidence to inform extent of Cordon Sanitaire reflected on Policies Map.
Policy C7: Fall prevention from taller buildings	Previously Policy D15. New name. Requirement changed from number of storeys to metrage.
Policy C8: Changing Places toilets	Created in response to DGCP comment, Government direction of travel and local need.
D. Historic Environment	
Policy D1: Historic environment	Previously Policy E1. Reworded to make clearer, additional criterion relating to archaeology.
Policy D2: Non-designated heritage assets	Previously Policy E3. Name changed. Additional criteria for design and consideration of new builds and demolition of non-designated heritage assets.
Policy D3: Recording and advancing understanding of heritage assets	Previously Policy E2. Additional requirement added - method will depend on asset in question and developer required to disseminate information. Mitigation moved to justification.
Policy D4: Shopfronts, shutters and signs	Previously Policy E4. Additional criteria added to provide more direction.

Policy D5: Views of the Cathedral and historic places of Worship	Previously Policy G17. Reference to SPD moved to supporting text.
E. Natural Environment	
Policy E1: Landscape character and sensitivity	Previously Policy F1 'Landscape'. Additional reference to retaining trees and hedgerows in response to DGCP.
Policy E2: Biodiversity and geodiversity	Merge of DGCP Policies F2 and F6. Additional reference to ecological networks and criteria for internationally designated, nationally designated and locally designated sites (at request of Natural England).
Policy E3: Nature Recovery Area	Previously Policy F3 'Nature Improvement Area'. Created in dialogue with Gloucestershire Wildlife Trust.
Policy E4: Trees, woodlands and hedgerows	Previously Policy F4. Expanded to include woodlands in response to DGCP. Now requires protection, incorporation, measurable net gains and protection through development phases.
Policy E5: Green Infrastructure: Building with Nature	Previously Policy F5. Expanded to include reference to Buildings with Nature standards (previously in supporting text).
Policy E6: Flooding, sustainable drainage and wastewater	Previously Policy F7. In consultation with Severn Trent and the Environment Agency, expanded to reference sustainable drainage (incorporating DGCP Policy F10) (now requires SUDS), watercourse restoration, wastewater discharge, financial contribution (in exceptional circumstances) to flood risk infrastructure.
Policy E7: Renewable energy potential of the River Severn and the canal	Previously Policy F8. Additional requirement to consider impact on commercial/leisure uses and biodiversity/riparian habitats.
Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation	Created in response to dialogue with Natural England re: Habitats Regulations and potential impacts on Cotswold Beechwoods Strategic Area of Conservation.
F. Design	
Policy F1: Materials and finishes	Previously Policy G3. Added reference to 'innovative modern materials will be supported where they would complement distinctiveness'.
Policy F2: Landscape and planting	Previously Policy G4. Added 'Where appropriate...'. No significant change to policy wording.
Policy F3: Community safety	Previously Policy G9. No significant change to policy wording; protecting against malicious threats included in the reasoned justification.
Policy F4: Gulls	Previously Policy G15. No significant change to policy wording.
Policy F5: Open plan estates	Created in response to DGCP to reflect a very locally specific design issue.
Policy F6: Nationally described space standards	Created to reflect new NPPF requirement / opportunity aligned with local evidence.
G. Sustainable Living, Transport and Infrastructure	

Policy G1: Sustainable transport	Created in response to growing concern around climate change and that the City Council has declared a climate emergency. Expanded and reframed since DGCP.
Policy G2: Charging infrastructure for electric vehicles	Additional text/requirements
Policy G3: Cycling	Created partly in response to DGCP, as well as opportunity in response to climate change
Policy G4: Walking	Created in response to LTP / climate change emergency. Protecting/incorporating opportunities for cycling
Policy G5: Broadband connectivity	Created in response to LTP / climate change emergency. Protecting/incorporating opportunities for walking
Policy G6: Telecommunications infrastructure	Created in response to a locally identified policy need.
Policy G7: Water efficiency	Created in response to IDP, working with Severn Trent / Environment Agency. Evidence of local water issues
Policy G8: Review mechanism	Created in to reflect NPPF requirements

Appendix 8: Site allocation changes between the Draft and Pre-Submission versions of the Gloucester City Plan

Site Allocations evolution/changes – Reg.18 draft to Reg.19 version for consultation			
Draft GCP (Reg.18) Sites	Commentary	Planning Ref for those with PP	Reg.19 Sites
SA01 Land at the Wheatridge	Still allocated at Reg 19	/	SA01: Land at the Wheatridge
SA02 Barnwood Manor	Still allocated at Reg 19	/	SA02: Land at Barnwood Manor
SA03 Gloucester Mail Centre	Planning granted	18/00336/JPA (48 dwellings under prior approval)	
SA04 Helipebs	No certainty over availability. Policy to protect employment land.		
SA05 Allstone site	Planning permission granted	16/00948/OUT (200 dwellings & 200 student units)	
SA06 Former Civil Service Club	Planning permission granted	18/00306/FUL (100 dwellings)	
SA07 67-69 London Road	Still allocated at Reg 19	/	SA03: Former Prospect House, 67 – 69 London Road
SA08 Wessex House	Still allocated at Reg 19	/	SA04: Former Wessex House
SA09 Great Western Road Sidings	Still allocated at Reg 19	/	SA05: Land at Great Western Road Sidings
SA10 Land off Leven Close	Planning permission granted	16/01558/OUT (10 dwellings)	
SA11 Land adjacent to St Aldates	Planning permission granted	14/00449/FUL (23 dwellings)	
SA12 Blackbridge Sports Hub	Still allocated at Reg 19	/	SA06: Blackbridge Sports and Community Hub
SA13 Land East of Waterwells Business Park	Part of this site still allocated at Reg 19, but 2 major parcels	/	SA07: Lynton Fields, Land East of Waterwells Business Park

	granted planning permission for housing		
SA14 Land at Clearwater Drive	Planning permission granted for a school	17/00729/FUL	
SA15 King's Quarter	Still allocated at Reg 19	/	SA08: Kings Quarter
SA16 Greater Blackfriars	2 parts of this site still allocated at Reg 19, but 2 major parcels granted planning permission for student accommodation	/	SA09: Former Quayside House, Blackfriars SA10: Former Fleece Hotel & Longsmith Street Car Park
SA17 Southgate Moorings	No longer available	/	
SA18104 Northgate Street	Now included within Kings Quarter allocation	/	
SA19 Land adjacent to Eastgate Shopping Centre	No longer allocated at Reg 19 due to the fact that it will be more appropriately dealt with through the JCS Retail Review	/	
SA20 Land at St Oswalds	Still allocated at Reg 19	/	SA11: Land rear of St Oswalds Retail Park
SA21 Former Town Ham Allotments	Dropped due to report indicating unsuitability / land instability etc	/	
SA22 Secunda Way Industrial Estate	The LPA considered it likely to come forward for employment use and so it was dropped off the allocation list. However, it is being promoted instead for residential use and the LPA still regard employment use on this site the most suitable. Thus it is still going ahead for allocation under ref: SA22.	/	SA22 - Secunda Way Industrial Estate
SA23 Land at Rea Lane	Still allocated at Reg 19	/	SA12: Land at Rea Lane, Hempsted
			SA13: Former Colwell Youth & Community Centre

			SA14: Land off New Dawn View
			SA15: Land south west of Winneycroft Allocation
			SA16: Land off Lower Eastgate Street
			SA17: Land south of Triangle Park (Southern Railway Triangle)
			SA18: Jordans Brook House
			SA19: Land off Myers Road
			SA20: White City Community Facility
			SA21: Part of West Quay, the Docks

Appendix 9: Regulation 19 consultation

Introduction

This appendix covers parts (v) and (vi) of Regulation 22(1)(c) which provides:

- (v) If representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations; and*
- (vi) If no representations were made in Regulation 20, that no such representations were made.*

The City Council published the Gloucester City Plan Pre-Submission for consultation on 7 November 2019, pursuant to Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. Initially published for just longer than six weeks consultation until 17th December 2020, this was extended until 14th February 2020 in response to certain evidence documents not being published on the City Council's website.

In total, the City Council received 92 'duly made' representations and eight non-duly made. This amount to 502 individual comments (494 duly made). A summary of the main issues raised in plan/policy order is provided at Section 3 below, which includes an initial response from City Council officers.

Who was consulted under Regulation 19 and how was it undertaken?

Upon publication of the consultation, letters/email notifications were made to consultees held on the planning policy consultation database, along with other notifications as appropriate. Further notifications were made following the decision to extend the consultation.

In addition to the above, awareness of the consultation was raised through the following:

- Publication on the City Council website
- Notifications to statutory, stakeholder consultation bodies (Appendix 6) and general consultation database
- Press notice
- Press release
- Social media posts
- Elected Member email to raise awareness.
- Hard copies of consultation documents in deposit locations

Main issues raised

Pursuant to Regulation 20, 91 duly made representations were received. Eight non-duly made representations were made. It total, 499 individual comments were received.

The following sets out a summary of the main issues raised to the Pre-Submission Gloucester City Plan consultation. Submission document CD010d 'Summary of representations with officer response' provided a more detailed summary.

Overall support was expressed for the Pre-Submission GCP, its vision, key principles and policies.

For the **context**, overall support was expressed, albeit some suggestions were put forward to make some factual amendments. It was also felt that the introductory paragraphs could give more weight to the issue of climate change and carbon neutrality.

The **Vision** was supported, though it was suggested it could be improved with reference to the Gloucestershire Health and Wellbeing Strategy 2019 – 2030 as the latest evidence base. It was also considered the Vision could be strengthened from a climate change perspective.

Overall, there was support for the **Key Principles** identified. It was suggested that some changes could be made to strengthen the approach towards climate change and the efficient use of resources and waste reduction. It was also suggested that a specific Key Principle relating to flood risk management should be considered. A respondent considered the GCP does not fully accord with Key Principle 1, regarding making the best use of brownfield land, in that it doesn't allocate their omission site.

The policies in **Section A 'Housing'**, received a higher number of responses. Overall, **Policy A1 'Effective and efficient use of land and buildings'** was strongly supported as it seeks to ensure the best possible use is made of development sites, whilst respecting character, context and local amenity. A comment was received from Historic England requesting the text be amended to safeguard heritage assets, and another from the South Worcestershire authorities requesting the inclusion of minimum density standards within the policy. Gloucestershire County Council as Minerals and Waste Local Authority consider criterion 5 should be revised to ensure resource and infrastructure safeguarding is effectively considered.

Policy A2 'Affordable Housing' received a higher number of soundness objections from the industry, though there was support from other bodies. The main objection relates to the perceived increase in the affordable housing from 20% in the adopted JCS (Policy SD11) to 25% in the GCP. One respondent felt affordable housing is a strategic matter that shouldn't be addressed in the local-level GCP. Concern was expressed regarding the impact of the requirement on viability and the way the cost has been reflected in the Viability Appraisal that supports the GCP. Objection was also raised in relation to the requirement for the occupation of affordable housing to be limited to those in need of affordable housing and to be secured in perpetuity, and that the policy is absent on housing mix and density. In contrast, support was expressed for the GCP providing clarity on the amount of affordable housing required, the policy clause to prevent the sub-division of sites to circumvent policy requirements and generally seeking to secure affordable homes to provide for the needs of communities.

Policy A3 'Estate regeneration' received a good level of support, in that it supports the regeneration of communities and seeks to deliver additional new homes. A soundness objection was raised by Gloucester City Homes on the basis that the complexity of schemes such as these require a policy lever to relax some requirements where it would stand in the way of otherwise beneficial regeneration. Others commented that the policy should support opportunities to increase density where appropriate, and also require improvements to waste collection.

Policy A4 'Student accommodation' received support from the University of Gloucestershire and Hartpury College and University, although some amendments have been suggested regarding flexibility for the use of student accommodation.

With regard to **Policy A5 'Specialist housing'**, soundness objections were raised by two respondents. The first states that the requirement for the applicant to demonstrate a 'sustainable business model' should be removed as it is considered unreasonable, and that in the case of speculative developments the end operator may not be known. The other

contended that the requirement for developers to contribute towards affordable housing, where the use would fall into Class C3 (on the basis that the development is already providing for a form of social need), should be removed.

Policy **A6 'Accessible and adoptable housing'** received a higher number of objections from the industry. The main reasons for this relate to the evidence supporting the requirements of the policy and the way the cost implications have been factored into the Viability Assessment and the potential impact on estate regeneration. Category M4(3) should only apply to affordable homes or homes the LPA is responsible for allocating. In contrast, support was expressed from Public Health at Gloucestershire County Council and South West Housing Association Planning Consortium (as long as applied pragmatically) and Redcliffe Homes (albeit a request for lower thresholds).

Policy **A7 'Self-build and custom-build'** received a higher number of objections from the industry. It was felt that the evidence base does not support the need for the policy, that it could affect delivery and create delay, the impact on viability and the way the cost had been factored into the Viability Assessment. Furthermore, that alternative means of delivery had not been explored, and that the requirement to deliver against self/custom build needs is a local authority, not developer responsibility. An alternative delivery model option was submitted by one respondent.

Policies **A8 'Static caravan sites'**, **A9 'Extensions to existing dwellings'** and **A10 'Annexes to existing dwellings'**, received no comments.

Policy B1 'Employment and Skills Plans' was generally well received, though the Home Builders Federation made some suggestions as to how the policy could be improved. Objection was received from one developer in that it would create additional costs and affect viability.

Policy B2 'Safeguarding employment sites and buildings' received a mixed response. On one hand, support was expressed for a policy that allows the release of employment land for alternative uses, where justified. On the other, respondents felt the policy is inflexible and doesn't reflect Policy SD1 'Employment development except retail development' of the JCS. It was also suggested by Sport England that commercial sports development should be allowed under the policy. Gloucestershire County Council as Minerals and Waste Local Authority requested that waste management infrastructure be afforded the same safeguarding provisions as B-use employment land.

Policy B3 'New employment development and intensifications and improvements to existing employment land' received strong support, with suggestions for how the policy could be improved in relation to environment impacts and supporting active travel.

Policy B4 'Development within and adjacent to Gloucester Docks and the canal' received strong support, along with some suggestions for improvements. These included strengthening the approach to public realm, historic significance and biodiversity net gain.

The Theatres Trust supports policy **B5 'Tourism and Culture'**; Historic England encourages a similar policy in relation to the City Council's Heritage Strategy.

Policy B6 'Protection of Public Houses' received one representation, from Stroud District Council. It suggests it would be helpful to define the physical distance for criterion 3, when determining what is meant by 'within walking distance of the site'.

The policies in **Section C 'Healthy communities'** were overall very well received. **Policy C1 'Active design and accessibility'** received strong support from Public Health at

Gloucestershire County Council and Sport England. Objection was raised on the basis that the policy goes beyond national policy requirements and is not justified – the National Design Guide is the standard to be met. Other suggestions were made for how the policy could be improved, including referencing the quality of green space as a key factor in encouraging use, providing the correct reference to the County Manual for Streets and amending terminology to align with the NPPF.

Policy C2 ‘Allotments’ receive one response, encouraging the policy to include a principle preventing pesticide use to help tackle the ecological emergency.

Policy C3 ‘Public open space, playing fields and sports facilities’ was well received, including from Sport England, Gloucestershire Playing Fields Association and the Gloucestershire FA. Objections were raised on the basis that the policy needs to provide greater flexibility to allow the redevelopment of open spaces where it would support estate regeneration. In contrast, it was expressed that criterion 1 of the policy, relating to ‘excess provision’ of open space does not accord with the NPPF (an ‘excess’ against standards doesn’t justify a loss). Some suggestions were made for how the policy could be improved, for example by opposing the loss of existing facilities where it would have a significant detrimental impact on ecological networks, and to secure additional benefits from landscape treatments, provision of green infrastructure, enhanced biodiversity and Sustainable Urban Drainage Systems.

Policy C4 ‘Hot food takeaways’ received support. Suggestions were made for how the policy could be improved, by reflecting updated child obesity figures and amended wording around highways impact to align with the NPPF. Gloucestershire County Council as Minerals and Waste Local Authority supported the policy requirement for adequate provision of waste and disposal facilities but suggested the policy would benefit from being more prescriptive and better aligned with local policy ambitions for the future management of waste.

Policy C5 ‘Air quality’ was strongly supported, including Gloucestershire County Council as Public Health lead, in that it supports the delivery of the Gloucestershire Air Quality Strategy. Some suggestions were made for how the policy could be improved, in referencing the positive mitigating impact of trees in creating a physical buffer between roads and development, and in referencing the impact of poor air quality on the natural environment. Furthermore, to ensure consistency with other policies, reference should be made to the requirement for Habitats Regulations Assessment in certain circumstances.

Policy C6 ‘Cordon Sanitaire’ was subject to a relatively large number of responses. One developer objected to the evidence that underpins the extent of the Cordon Sanitaire, and to the approach taken in the policy. Many responses from local residents objected to the perceived reduction/change in the extent of the Cordon Sanitaire boundary, but all raising the issue of odour nuisance from Netheridge Sewage Treatment Works.

Policy C7 ‘Fall prevention from tall buildings’ received strong support from Gloucestershire County Council as Public Health lead as an evidence-based intervention that can help prevent death and serious injury.

Policy C8 ‘Changing Places toilets’ received support from Sport England, with a suggestion to reference the Sport England guidance for the construction of sports buildings, which includes Changing Places toilets.

The policies in **Section D ‘Historic environment’** were overall supported, including from Gloucestershire County Council Archaeology and Gloucester Civic Trust. Historic England commented that the policies and supporting text would benefit from better referencing of the

Council's recently adopted Heritage Strategy, High Street Heritage Actions Zone, Article 4 Directions, Townscape Character Assessment and Public Realm Strategy.

Policy D1 'Historic environment' received concerns that the policy is too restrictive and that it should allow for circumstances where proposals resulting in 'less than substantial harm' to the significance of a designated heritage asset should be weighed against the public benefits.

Policy D2 'Non-designated heritage assets' received concerns that the policy is too restrictive and should allow greater flexibility in accordance with the NPPF. Historic England suggested minor changes to rationalise the text and provide greater consistency and encourage the City Council to commit to preparing a Local List. Support was expressed for the use of the term 'balanced assessment'.

Policy D3 'Recording and advancing understanding of heritage assets' received no responses.

Policy D4 'Shops, shutters and signs' received an objection on the basis that the policy appears to be unsupportive of certain types of signage.

Policy D5 'Views of the Cathedral and historic places of worship' received two opposing views. One stated that not all historic places of worship are going to have the same sensitivity as the Cathedral. The other, from Historic England, is that other significant heritage concerns should not be overlooked.

The policies in **Section E 'Natural Environment'** overall received strong support. Suggestions were made to strengthen the section, in that a reference should be made to the climate and ecological emergencies that have been declared by the Government and the City Council, and that reference should be made to both green and blue infrastructure. Better reference should also be made of the South West Marine Plan.

Policy E1 'Landscape character and sensitivity' received both support and objection. Support was expressed for the balanced approach set out in the policy, objection was raised on the approach taken to hedgerows, as they almost impossible to retain when masterplanning a site. It was further suggested that the policy should address new landscape features, or cross-reference to Policy E4 of the GCP.

Overall, there was strong support for **Policy E2 'Biodiversity and geodiversity'** in that it links net gain with strategic Green Infrastructure, the approach to a Nature Recovery Network and the opportunity to mitigate off-site. It was further stated that the policy clearly follows national planning policy but also the advice of the Gloucestershire Local Nature Partnership. Suggestions were put forward for how the policy and supporting text could be strengthened, for example a mention of the associated biodiversity benefits from SuDS and clarifying the purpose of the Asterix. It is requested the word 'must' is provided with 'should' and that the long-term impacts are considered when reviewing proposals for biodiversity net gain that may mature beyond the build period.

Policy E3 'Nature Recovery Area' received strong support as an opportunity to capture off-site mitigation. To strengthen the policy, it has been suggested that it states 'Development proposals with the NRA, or in area ecologically related to it...' It was also suggested the target species list should be amended.

Policy E4 'Trees, woodlands and hedgerows' received strong support, with some suggestions for ways the policy could be strengthened, including a greater root protection buffer and ancient/veteran trees and a commitment to maintenance measures. As with

Policy E1, it has been requested that reference to hedgerows is removed, given the difficulty of retaining them when masterplanning.

Strong support was expressed for **Policy E5 'Green infrastructure: Building with Nature'**. Suggestions were made for improvements, for example by renaming the policy 'Green and blue infrastructure', referencing the JCS Green Infrastructure Strategy, referencing SuDS and working with natural processes. In contrast, objection was raised as it was considered there was a lack of justification (policy can encourage not require) and it was also noted that Natural England are preparing their own standards, so the wording could refer to 'equivalent standards'.

Policy E6 'Flooding, sustainable drainage and wastewater' received very strong support, including from the Environmental Agency, Gloucestershire Lead Local Flood Authority and Severn Trent. The Environment Agency strongly recommends the final sentence is removed and replaced with wording to expand upon opportunities that may present themselves during the plan lifetime. Furthermore, that changes are made to strengthen supporting text in relation to the design and layout of sites. Likewise, the LLFA make several suggestions for improvements to the supporting text, including reference to the benefits of upstream Natural Flood Management.

Overall strong support was expressed for **Policy E7 – Renewable energy potential of the River Severn and the Canal'**. Suggestions were made for some improvements, including an addition to the supporting text for relevant applications to have regard to the South West Marine Plan, and an amendment to require the consideration of landscape and visual impacts from proposals.

Policy E8 'Development affecting Cotswold Beechwoods Special Area of Conservation' received strong support, including from Natural England as statutory consultee. Suggestions to strengthen the policy were made, including stating protection should include ancient woods and ancient and veteran trees, and that mitigation should also refer to provision of Suitable Alternative Natural Greenspace, in partnership with other authorities / stakeholders.

The policies in **Section F 'Design'** were overall well received, albeit there was a high-level objection to Policy F6 'Nationally Described Space Standards'.

Policy F1 'Materials and finishes' received two responses, with a suggestion to amend the policy to help steer the decarbonisation of construction (e.g. using local timber for frames), and another to promote resource efficiency and management of waste.

Significant support was expressed for **Policy F2 'Landscape and planting'** although there were some suggestions for policy improvements. This includes expansion of policy to require developers to procure trees with strong biosecurity measures or nurseries that quarantine, requiring greater consideration of the ecological suitability of planting schemes and a requirement to seek an overall net gain for biodiversity where possible. It was also commented that matters such as these should be able to be reserved for future consideration for outline planning applications, and that the use of the word 'must' should be replaced with 'should'.

Policy F3 'Community safety' received two responses stating that the policy must acknowledge the potential detrimental impacts on wildlife from safety lighting, and that the requirement for parking on-plot and avoiding parking courts will place an over-reliance on allocated parking, which will not afford balanced approaches to parking.

Policy F4 ‘Gulls’ received two responses, stating that consideration should be given to providing allocated gull nesting sites to encourage breeding in areas where nuisance behaviours can be contained, along with a request for the policy to be broadened to include feral pigeons.

Policy F5 ‘Open plan estates’ received one response from Gloucestershire Wildlife Trust, commenting that the enclosure of land must not degrade ecological networks, and that wherever possible, enclosure should be through hedgerows rather than non-permeable fencing and walling.

Policy F6 ‘Nationally described space standards’ received a higher amount of objection. It was expressed that housebuilders and specialist providers adopt relevant and appropriate standards in their developments and it is not therefore necessary to adopt the national standard. It was expressed that the evidence prepared does not support the need for the standards and the impact on viability, housing supply and affordable housing is not considered. It was further expressed that this issue is strategic in nature and should not be addressed in the non-strategic GCP. In contrast, support was expressed on the basis that it supports the Gloucester City Integrated Locality Partnership priority to support improvements in mental health and wellbeing of children and young people living in the city.

Overall, there was strong support for **Policy G1 ‘Sustainable transport’**, including from Stagecoach, the primary local bus service provider. Support was expressed for the commitment for the sustainable transport network and that it is sufficiently clear to support transport related interventions. It was further noted that paragraph 3.7.10 is inaccurate and should be updated to make clear what the GCP Highways Assessment is.

Policy G2 ‘Charging infrastructure for electric vehicles’ received a mix of responses. Concern was expressed for the way the cost has been addressed within the viability appraisal (50% of dwellings and whether the identified cost allows for more than the plug socket). One developer stated that the figures can’t be ‘required’ as implementation may not always be technically feasible. In contrast, support was expressed, and it was considered the 2% requirement for parking spaces in commercial development should be much higher, and that the policy should support charging for e-bikes in town centres.

Responses to **Policy G3 ‘Cycling’** asks for the policy/supporting text to reflect the fact that the canal towpath isn’t a dedicated cycle path and the needs of others need to be considered. Furthermore, that the policy could be improved by supporting green cycle routes, which are more likely to be used and enhance ecological networks.

Policy G4 ‘Walking’ received a response from Gloucestershire Wildlife Trust, stating that the policy could be improved by supporting green walking routes, which are more likely to be used and enhance ecological networks.

Policy G5 ‘Broadband connectivity’ received one response from the Home Builders Federation, raising concerns that the delivery of broadband service connections are reliant on third party contractors, over which the developer is unlikely to have any control. Furthermore, that the policy should not impose onto developers connectivity requirements that go beyond the provision of infrastructure as set out in Building Regulations.

Policy G6 ‘Telecommunications infrastructure’ received no responses.

Policy G7 ‘Water efficiency’ received some objection on the basis that new policy is new and hasn’t been consulted on before, and that it is not justified by the evidence. It was also suggested that it could be improved by the provision of a description of how water efficiency will be achieved, mentioning the benefits of upstream Natural Flood Management and the

water quality benefits of SuDS. Support was expressed by the Gloucestershire Lead Local Flood Authority and Severn Trent as local water and drainage provider.

Policy G8 ‘Review mechanism’ received contrasting views. One is that the policy should not identify affordable housing as the priority in a review of infrastructure provision, the other that it is too open ended and should be restricted to affordable housing.

Several generic comments were made to the **site allocations** section of the GCP. It was recommended by the LLFA that all site allocations should have a section within the policy regarding flood risk and SuDS, not just those located in flood zones. Objection was raised on the basis that allocations don't include a minimum density standard. In contrast support was expressed for the identification of the allocations and the City Council's approach of identifying significantly higher densities on sites within or near to the city centre, as well as the biodiversity measures identified. Concern was raised regarding a perceived shortfall in the allocation of employment land against the JCS requirement and the same for retail floorspace. Gloucestershire County Council, as Minerals and Waste Local Authority, requested amendments to many of the site allocations policies to create better synergy with the Minerals and Waste Local Plans. Some challenges were made regarding the deliverability of some of the site allocations. Another objector challenged the allocation of the site on the basis of the flooding sequential test (promoting a site in a lower flood risk area).

Policy SA01 ‘Land at The Wheatridge’ received some objection based on the suitability of the site to accommodate a primary school and the need for it in this location. In contrast, support was expressed, including from Gloucestershire County Council as education authority, to the only suitable site in the local area that could accommodate a new primary school. Support was expressed from Gloucestershire Wildlife Trust for the identified biodiversity measures to be delivered.

Policy SA02 ‘Land at Barnwood Manor’ received overall support for the allocation. One objection was raised based on the application of the flood risk sequential test from the promoter of an omission site. Please note that at the time of writing this statement this site has been granted planning permission for residential development.

Policy SA03 ‘Former Prospect House’ received support, including from the landowner and local resident association. The landowner noted that the red line boundary identified on the policies map needs amending, that the policy should support redevelopment (as opposed to re-use) and that the identified capacity should be 60 rather than 30. Other comments were made regarding the need for flexibility regarding biodiversity requirements. A request was made for the City Council to work with the resident association on a Development Brief for the site.

Policy SA04 ‘Wessex House’ received strong support for the allocation of the site for residential development and the identified biodiversity measures. Gloucestershire NHS Foundation Trust commented that any development would need to consider the impact on the road network surrounding Gloucestershire Royal Hospital.

Policy SA05 ‘Land at Great Western Road Sidings’ received strong support for the allocation, including from the landowners (Network Rail), as well as support for the identified biodiversity measures. Gloucestershire NHS Foundation Trust commented that any development would need to consider the impact on the road network surrounding Gloucestershire Royal Hospital.

Policy SA06 ‘Blackbridge Sports and Community Hub’ received strong support for the allocation, including Active Gloucestershire and the Gloucestershire Football Association. The identified biodiversity measures were further supported.

Policy SA07 ‘Lynton Fields, Land East of Waterwells Business Park’ received objection based on the identification of an employment allocation, instead requesting allocation for residential development. In contrast, the proposed allocation was supported by Stagecoach and Stroud District Council.

Policy SA08 ‘King’s Quarter’ received strong support for the allocation. Please note that at the time of writing this site has been granted planning permission for a mixed-use development.

Policy SA09 ‘Former Quayside House, Blackfriars’ received strong support, including from the landowner, Gloucestershire County Council and Gloucestershire Clinical Commissioning Group, the latter in response to the allocation for healthcare facilities. Support also expressed by Stagecoach. The Environment Agency expressed concern regarding the viability of the site over its lifetime from a flood risk perspective, which may require some policy amendments.

Policy SA10 ‘Former Fleece Hotel and Longsmith Street Car Park’ received strong support for the allocation, including from Dowdeswell Estates, the preferred developer for the site.

Policy SA11 ‘Land rear of St Oswald’s Retail Park’ received objection from a leaseholder, based on the costs of mitigating site constraints to deliver residential development. The Environment Agency raised objections because of the mitigation necessary to address contamination and previous use of the site, and recommend some changes to the policy to address these. Support for the allocation was expressed by others, including Stagecoach, as the site is a sustainable location for high density development.

Policy SA12 ‘Land at Rea Lane, Hempsted’ received support from the landowner. Soundness objections were raised by others, including Hempsted Residents Association, based on suitability, constraints and infrastructure needs. The issue of the Cordon Sanitaire is also raised – see policy C6. Please note that this site has now been granted planning permission.

Policy SA13 ‘Former Colwell Youth and Community Centre’ received support for the allocation (including from the landowner) and for the biodiversity measures identified. Gloucestershire Hospitals NHS Foundation Trust commented that the impact of development on the road network surrounding Gloucestershire Royal Hospital would need to be considered.

Policy SA14 ‘Land of New Dawn View’ received support for the allocation from the landowner, and support from Gloucestershire Wildlife Trust to the identified biodiversity measures.

Policy SA15 ‘Land South West of Winnycroft Allocation’ received support for the allocation from the landowner, and support from Gloucestershire Wildlife Trust to the identified biodiversity measures. The Environment Agency commented that the policy could be improved by including an additional comment that the site should contribute to the ongoing SuDS and Twyver flood mitigation scheme.

Policy SA16 ‘Land off Lower Eastgate Street’ received support for the allocation, including from the landowner, and support from Gloucestershire Wildlife Trust to the identified biodiversity measures.

Policy SA17 ‘Land South of Triangle Park’ received a comment from the landowner, Network Rail, that whilst the site is currently required for operational purposes, it may become available for employment development later in the plan period. Gloucestershire Wildlife Trust support the identified biodiversity measures but suggested the policy could be improved through the creation of a 15-metre buffer between development and the railway line.

Policy SA18 ‘Jordan’s Brook House’ received support from the landowner. Support was expressed by Gloucestershire Wildlife Trust for the identified biodiversity measures.

Policy SA19 ‘Land off Myers Road’ received support for the allocation and the identified biodiversity measures. Gloucestershire Hospitals NHS Foundation Trust stated that the impact of development on the road network surrounding Gloucestershire Royal Hospital will need to be considered.

Policy SA20 ‘White City Community Facility’ received support from the White City CIC as the only available site that can accommodate a new community facility within the area (in part to replace one that has already been lost).

Policy SA21 ‘Part of West Quay, The Docks’ received support for the mixed-use allocation, including from the landowner, but with a request to increase the indicative capacity from the 20 dwellings identified in the policy. The Environment Agency note the site is located within The Docks regeneration area and therefore flood risk should be addressed.

Policy SA22 ‘Land adjacent to Secunda Way Industrial Estate’ received a soundness objection from the landowner, on the basis that the employment allocation should be changed to residential. The Environment Agency state that flood risk may impact on the access to the from Secunda Way at the northern end of the site and should be highlighted on the site requirements of the policy.

In total, 14 **omission sites** were submitted as part of the consultation.

- Three of these are located outside of Gloucester City in Stroud District Council’s administrative area, in whole or in part; ‘Land south of former Tuffley Farm’, ‘Land South of Grange Road’ and ‘Land off M5 Junction 12’.
- The ‘Former Oil Storage Depot’ was subject to planning permission and this has now expired. The landowner wishes the site to be considered as an allocation.
- ‘Land at Naas Lane’ was at the time of the consultation subject to a planning application and has subsequently been granted planning permission for residential development.
- ‘Land east of St Oswald’s Retail Park’, ‘Land off Hempsted Lane’ and ‘Land West of Newark Farm’ are new sites that don’t feature in the Council’s Strategic Assessment of Land Availability.
- ‘Land east of Winnycroft Farm and north of Green Farm’ is included within the Strategic Assessment of Land Availability and found unsuitable based on the presence of a moat that is a Scheduled Monument. The developer contends the heritage asset can be enhanced through development.
- Sites at ‘Mill Place’, ‘Peel Centre’ and ‘Madleaze Industrial Estate’ form a part of the ‘Canal Corridor’ and are included within the Strategic Assessment of Land Availability. All are at present functioning retail or employment sites. Mill Place and Madleaze Industrial Estate are promoted as mixed-use redevelopment opportunities, the Peel Centre as an opportunity for additional retail development.
- ‘Westgate Retail Park’ is an existing retail-led mixed-use development, promoted as an opportunity for additional development.

In terms of **evidence**, the **Viability Appraisal** received objection, primarily on the basis that how policy costs have been applied, as well as methodological assumptions made, for example in relation to build costs and borrowing costs. See earlier in this summary for where this issue has been raised.

The City Council's **housing land supply** position and the deliverability of some of the site allocations was challenged, with omission sites identified to fill a shortfall

The **Sustainability Appraisal** was supported by statutory consultees, the main criticism from developers submitted omission sites was that it had failed to consider reasonable alternatives.

The **Habitats Regulations Assessment** received support from Natural England as statutory consultee.

Historic England requested that better referencing be made of the City Council's recently adopted **Heritage Strategy**, the associated **background paper**, **Townscape Character Assessment** and **Public Realm Strategy**.

Subject to some points of clarification, both Highways England and Gloucestershire County Council as Highways Authority were supportive of the **transport** evidence informing the Plan.

Sport England were supportive of the Council's **Playing Pitch Strategy**, which is being actively delivered and kept up to date.

A substantial number of responses were submitted in relation to the **Cordon Sanitaire** evidence (both duly and non-duly made). From a developer perspective, it is considered the methodology is flawed, whereas concerns were raised by the local community regarding a perceived reduction in the size of the boundary within which odour nuisance is likely.

Industry respondents raised objection to the City Council's evidence underpinning Policy A5 '**Specialist Housing**', Policy A6 '**Accessible and adaptable housing**', Policy A7 '**Self-build and custom-build homes**' and Policy F6 '**Nationally described space standards**', all contained within the Housing Background Paper. The objections primarily relate to the justification and the impact on development viability.

Objection was also raised to Policy G7 '**Water efficiency**' and the evidence used to support the policy.

Examples of consultation activity

Letter sent to consultees

7th November 2019

Dear Sir / Madam,

Pre-Submission Gloucester City Plan - Consultation

I am writing to inform you that the Pre-Submission Gloucester City Plan (GCP) was approved for public consultation by the City Council on 26th September 2019, under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The Plan has now been published for consultation for a period of six weeks, between Thursday 7th November and Friday 20th December 2019. All comments must be received by 5pm on Friday 20th December 2019.

Where to view the documents

The Pre-Submission GCP, Policies Map, Sustainability (Integrated) Appraisal, Habitats Regulations Assessment, Consultation Statement and Statement of Representations Procedure and Statement of Fact are available to view at:

- City Council's website at www.gloucester.gov.uk/cityplan;
- City Council's reception – 'The Gateway', 92 – 96 Westgate Street, Gloucester, GL1 2PE; and
- All libraries in Gloucester (see the website for details of locations).

The evidence base is available to view online at www.gloucester.gov.uk/cityplan or in hard copy by appointment at 'The Gateway'.

How to make representations

Representations can be made online, by email or via post.

- Respond online or download electronic response forms at www.gloucester.gov.uk/cityplan. Completed electronic response forms should be emailed to cityplan@gloucester.gov.uk.
- Pick up a response form from the City Council's reception at 'The Gateway', 92 – 96 Westgate Street, Gloucester, GL1 2PE or any library in Gloucester City. Hard copy representations should be sent to Planning Policy Team, Gloucester City Council, PO BOX 3252, Gloucester, GL1 9FW.

What happens to representations?

Copies of all comments received will be submitted in full to the Secretary of State and considered as part of the examination by the Planning Inspector. Please note that copies of all comments will be made available for the public to view (including your name, but will not include any personal contact details or signatures), and therefore cannot be treated as confidential. Data will be processed and held in accordance with the General Data Protection Regulation 2016 and Data Protection Act 2018. For further information on how we use your data please see the privacy notice on the Council's website.

Appearing at the Examination

The Examination is open to the public, subject to the venue's seating availability. Anyone can attend and listen to the discussions but there are strict rules which apply to those who wish to participate. If a person wishes to appear at the examination as a participant, such a request must be made as part of their representation on the GCP. The Inspector, once appointed, will decide who can attend the Examination, depending on the agenda.

Further information

If you would like any further information, please visit www.gloucester.gov.uk/cityplan. If your query is more specific, please contact the Planning Policy Team by emailing cityplan@gloucester.gov.uk, or telephoning the City Council on 01452 396396.

Yours faithfully,

Adam Gooch
Planning Policy Team Leader
Gloucester City Council

Public consultation on Gloucester City Plan starts

Published

08.11.2019

The public can now submit their comments on the Gloucester City Plan, which is the last stage before going to the Planning Inspectorate.



- Consultation on Gloucester City Plan (GCP) runs from 7 November to 20 December 2019.
- GCP contains 22 sites for residential, employment, mixed-use, sports and community development.
- GCP contributes 972 new homes, providing much needed supply in the city.
- The consultation can be found at: <https://gloucester.inconsult.uk/consult.ti/cityplan.presub/consultationHome>

The public can now give their opinion on the latest Gloucester City Plan.

The plan, which was accepted by Gloucester City Council last month, is going to public consultation for 6 weeks before it gets submitted to the Planning Inspectorate.

The GCP contains ambitious policies and development opportunities for new homes, employment development and mixed-use and community spaces.

The public will be able to make comments on the GCP until Friday 20 December.

Despite the city having a limited supply of land for development, the GCP identifies 22 potential sites that make the most efficient use of what land is available. Sites

have been included drawing from the ongoing and targeted 'call for sites', land on the brownfield register and a review of internal land assets.

The plan goes further than the adopted Joint Core Strategy (JCS), as it stipulates that 25% of the housing that comes forward must be affordable. The JCS looks to 20% as a starting point.

The plan seeks to support healthier communities as it limits opportunities for hot food takeaways, encourages more active travel, seeks more tree planting and reductions in air pollution and promotes high quality green infrastructure. There is also an obligation on developers to put in place measures to prevent falls from tall buildings.

As Gloucester City Council has recently declared a climate change emergency, this is also factored into the plan. There are policies on flood risk and water efficiency, the promotion of sustainable transport, the use of electric vehicle charging infrastructure and the delivery of more green infrastructure such as trees, hedges and biodiversity gain on sites.

Head of Place for Gloucester City Council, Ian Edwards, says:

“Development of land in Gloucester is essential as the city continues to grow and prosper. The Gloucester City Plan puts in place important policies and structure on how we'll go forward.

”This plan was supported by all of the Council after undergoing very thorough questioning by the Overview and Scrutiny Committee.

“It has already gone through 4 rounds of public consultation, and the comments we received informed its development to this point. The public now has another opportunity to tell us their views on the draft plan so that it can go on to the next stage.”

After the consultation, the draft plan will be submitted to the Planning Inspectorate prior to a public examination.

The plan and where to submit comments can be found at: <https://gloucester.inconsult.uk/consult.ti/cityplan.presub/consultationHome>

Press Release

City Plan consultation extended

Published

09.01.2020

The Gloucester City Plan consultation is open until 5pm Friday 14 February 2020.



Gloucester City Council's consultation on its City Plan (GCP) has been extended until Friday 14 February 2020.

Residents can submit their views on the plan, which contains ambitious policies and development opportunities for new homes, employment development and mixed-use and community spaces.

The GCP identifies 22 potential sites that make the most efficient use of what land is available. Sites have been included drawing from the ongoing and targeted 'call for sites', land on the brownfield register and a review of internal land assets.

The plan goes further than the adopted Joint Core Strategy (JCS), as it stipulates that 25% of the housing that comes forward must be affordable. The JCS looks to 20% as a starting point.

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Public notice

Notice of Publication: Pre-Submission Gloucester City Plan Regulation 19: Town and Country Planning (Local Planning) (England) Regulations 2012

Title of the Plan

Gloucester City Plan 2011 - 2031

Subject matter and area covered by the Plan

Gloucester City Council has prepared the 'Pre-Submission' Gloucester City Plan (GCP) for a six-week period of public consultation. The GCP covers the administrative area of Gloucester City Council and a twenty-year period between 2011 and 2031. It delivers the Joint Core Strategy (JCS) at the local level but also provides a planning framework that reflects and addresses the local issues and opportunities in the City. It includes; a Vision and Key Principles for development in Gloucester; planning policies that, once adopted, will be used to inform planning proposals and assess planning applications; and site allocations to provide for the development needs of the city.

'Pre-Submission' is the final stage of consultation before the GCP is submitted to the Secretary of State for Housing, Communities and Local Government for independent examination.

Period of publication for representations

Representations are invited on the 'Pre-Submission' GCP for six-weeks between Thursday 7th November and Friday 20th December 2019. Representations must be received by the City Council no later than 5pm on Friday 20th December 2019.

Where to view the documents

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Appearing at the Examination

The Examination is open to the public, subject to the venue's seating availability. Anyone can attend and listen to the discussions but there are strict rules which apply to those who wish to participate. If a person wishes to appear at the examination as a participant, such a request must be made as part of their representation on the GCP. The Inspector, once appointed, will decide who can attend the Examination, depending on the agenda.

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Appendix 5A: Representation summary table with officer response

See separate document.