

**GLOUCESTER CITY PLAN (2011-2031)
STATEMENT OF COMMON GROUND**

between

**Gloucester City Council
&
Historic England**

1. Introduction and background

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Gloucester City Council (GCC) and Historic England (HE), referred to hereafter as 'the parties'. The SoCG documents matters which are agreed and not agreed by the parties regarding certain policies in the Pre-Submission Gloucester City Plan (GCP), which has now been submitted to the Secretary of State for independent examination.
- 1.2 This SoCG is provided without prejudice to other matters of detail that the parties may wish to address at the examination.
- 1.3 HE has been consulted at all stages of preparation of the Gloucester City Plan (GCP).
- The Scope (2011)
 - City Plan Part 1 (2012)
 - City Plan Part 2 (2013)
 - Draft Gloucester City Local Plan (2017)
 - Pre-submission Gloucester City Plan (2019)

2. Matters on which the parties agree

- 2.1 The City Council has engaged with HE in the preparation of the Plan through formal and informal consultation and as such the Duty to Cooperate has been fulfilled. The parties agree to continue to work positively together.
- 2.2 Overall, HE supports the GCP and the positive way in which the historic environment has been addressed.
- 2.3 For ease of reference, HE's original response to the GCP Pre-Submission consultation has been annotated, providing details of the agreed positions regarding the matters raised. This is provided as Appendix 1.
- 2.4 In response to representations submitted to the Pre-Submission GCP, a number of proposed changes are agreed between the parties. References are provided to Submission Document CD010a 'Schedule of changes – Pre-Submission Gloucester City Plan Addendum'. Further information is also provided in CD010d 'Summary of Representations with Officer Response', and a tracked changed version of the Pre-Submission GCP, highlighting the proposed changes, is available at Submission Document CD010b.
- 2.5 All matters are now agreed, and any objections raised by HE in their response to the GCP Pre-Submission consultation have been resolved.

3. Matters on which the parties are not agreed

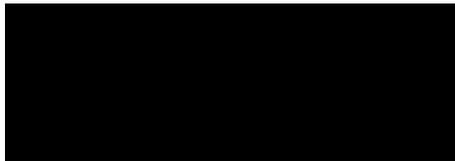
3.1 None

4. Conclusion

4.1 The parties agree that:

- a) All matters raised in Historic England's representations to the Gloucester City Plan Regulation 19 consultation have been addressed (see Appendix 1) and no soundness objections remain.
- b) Gloucester City Council has complied with the Duty to Co-operate in preparing the Gloucester City Plan through the various stages to date; and
- c) The parties will continue to work positively together and with all Gloucestershire local authorities and, where relevant, with neighbouring authorities on strategic cross boundary issues.

Signed on behalf of Gloucester City Council



Ian Edwards, Head of Place

Signed on behalf of Historic England



Rohan Torkildsen, Historic England

Dated 18th March 2021

Appendix 1: Statement of Common Ground (SoCG) between Gloucester City Council and Historic England
 Gloucester City Plan (2011-2031)

This Statement of Common Ground (SoCG) has been prepared by Gloucester City Council (GCC) and Historic England (HE). The table below was originally submitted by HE in response to the Pre-Submission Gloucester City Plan (GCP) consultation. It has now been expanded to demonstrate how agreement has been reached by parties in addressing the issues raised.

Plan ref and relevant extract	Historic England comment	GCC response	Position/Conclusion
Para 2.18 Gloucester today, Gloucester tomorrow – A portrait of the city	Historic England (HE) notes the portrayal of Gloucester’s “unique and rich heritage” and reference to the recently adopted Heritage Strategy and its importance in underpinning the delivery of <i>quality places, tourism and culture</i> .	Noted/welcomed	N/A
Para 2.21 Vision <i>Gloucester’s unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy.</i>	HE welcomes such a commitment	Noted/welcomed	N/A
Para 2.21 Key Principles	HE welcomes an evident cross cutting role of Gloucester’s heritage in shaping its future as expressed in many of the key principles.	Noted/welcomed	N/A
Policy A1	An efficient use of land is to be encouraged and is, with care, entirely compatible with the character and appearance of the historic	The City Council considers that the Plan should be read as a whole and that the historic environment policies address this matter.	HE acknowledges GCC response and does not wish to further challenge its position.

Effective and efficient use of land and buildings	environment. However, to ensure this occurs the policy could benefit from a reference to the need to safeguard Gloucester’s heritage assets and their setting in a manner appropriate to their significance.		
Policy B4: Development within and adjacent to Gloucester Docks and Canal	To ensure consistency with national policy perhaps policy text might make reference to the need for proposals to take account of the desirability of sustaining and enhancing the significance of the historic docks conservation area and other individual heritage assets and ensure new development makes a positive contribution to its character and distinctiveness.	In response to HE’s response, the City Council suggested the following proposed change (PM016, Submission Document CD010a): <i>2. The development would not adversely affect, and where possible enhances the historic built character significance, features and setting of the open waterspaces; and</i>	Further discussions between the parties confirm the suggested wording does not fully satisfy the objection raised by HE. Therefore, it is agreed that the following text should replace that at criterion 2 of Policy B4: <i>‘Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness.’</i>
Policy B5: Tourism and culture	HE welcomes reference to policy support for proposals that deliver the Cultural Strategy but would encourage a similar policy approach which supports the delivery of Gloucester’s Heritage Strategy, perhaps at Section D where paragraphs 3.4.3 on make considerable reference.	The City Council considers the Heritage Strategy is different in that it is more of a cross-cutting golden thread, the planning elements for which will be delivered through other policies in the Plan, primarily those in Section D ‘Historic Environment’. Notwithstanding this, it is proposed that referencing of the Heritage Strategy in the introductory section will be strengthened – see below (PM034, Submission Document CD010a).	Matter agreed/resolved
C: HEALTHY COMMUNITIES	Mindful of the significance of Gloucester’s history reflected in its streets, buildings and townscape, might the opportunity be taken to refer to its role in helping promote good health and wellbeing. Significant evidence has been gathered which indicates how	In response, to strengthen this point, the parties agree to the following proposed change (PM019, Submission Document CD010a): ‘3.3.6 The following policies have been included to ensure new development does not harm human health and takes all available opportunities to	Matter agreed/resolved.

	<p>visiting heritage has a significant positive relationship with life satisfaction. https://historicengland.org.uk/whats-new/research/back-issues/wellbeing-and-the-historic-environment/</p>	<p>provide our residents with healthy active choices. <i>More widely, the GCP supports the creation of healthier communities. This is reflected in many other policies, for example those relating to heritage, good design and creating a sense of place in new development, the delivery of new homes that meet the needs of communities and sustainable transport.'</i></p>	
<p>D: HISTORIC ENVIRONMENT</p> <p>Evidence</p>	<p>As part of its previous response to the emerging Local Plan, Historic England had explicitly welcomed preparation of a Historic Environment Topic Paper and the ward profiles (detailed analysis of the strengths and opportunities facing each area of the City) to inform a positive strategy for the conservation of the city's historic environment.</p> <p>However this is no longer referred to in the schedule of evidence. Is it no longer relevant? Is there other alternative evidence that has been applied?</p>	<p>Since the Draft GCP was published, the City Council has prepared a new Heritage Strategy (Submission Document HIS001), which is supported by the substantial background document (Submission Document HIS002), as well as a Townscape Character Assessment (Submission Document DES001 / DES002) and Public Realm Strategy (Submission Document DP008).</p> <p>Together, these replace the topic paper and provide a more comprehensive and up-to-date evidence base regarding heritage matters.</p>	<p>Matters agreed/resolved</p>
<p>D: HISTORIC ENVIRONMENT</p> <p>Heritage Strategy (2019)</p>	<p>HE welcomes the reaffirmation of Gloucester's remarkable heritage and its positive role in shaping the future planning of the city.</p> <p>HE endorse the city's Heritage Strategy as an important means to illustrate, in the Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). However we reaffirm our previous comment (see Policy B5) that a specific policy reference could/should be made.</p>	<p>In response, to strengthen the introduction to Section D 'Historic Environment', the parties agree to the following proposed additional text in the introduction to Section D (PM034, Submission Document CD010a):</p> <p><i><u>'Gloucester Heritage Strategy</u></i></p> <p>3.4.3 The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to live, work, visit and invest. It also provides volunteer</p>	<p>Matter agreed/resolved.</p>

	<p>It may also be helpful for the Plan to set out and or illustrate, succinctly, the projects and opportunities in the Heritage Strategy (the highlights) to deliver, enable, engage and support heritage conservation.</p>	<p>opportunities and helps foster local identify and pride.</p> <p>3.4.4 The overall aim of the HS is ‘To achieve effective and sustainable conservation, regeneration and management of Gloucester’s heritage, so as to fully realise its economic, community and cultural potential.’ It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.</p> <p><i>3.4.5 The HS was delivered through the Great Place scheme, funded by the Heritage Fund and Arts Council England. The Great Place scheme places a strategic focus on enhancing Gloucester’s heritage for all and embeds a culture of developing an holistic approach to the regeneration of the city centre through the development of a heritage strategy which will in turn aid proactive working with developers, members, stakeholders and partners, whether professional or residents of the City over the next ten years and beyond.</i></p> <p><i>3.4.6 Heritage is a key component in the effective delivery of sustainable growth. It contributes to the creation of a competitive City Centre, support for the diverse needs of local communities, and the creation and maintenance of a high quality and sustainable environment. The historic environment is an integral part of the wider regeneration, economic development, tourism and cultural aspirations of the City of Gloucester.</i></p> <p><i>3.4.7 A background document has been created which informs the Gloucester Heritage Strategy 2019-29 titled "Gloucester Heritage Strategy Background Document</i></p>	
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<p>D: HISTORIC ENVIRONMENT</p> <p>Cathedral Quarter High Street Heritage Action Zone</p>	<p>Gloucester has been chosen to be one of county's flagship High Street Heritage Action Zones.</p> <p>The Cathedral Quarter High Street Heritage Action Zone is Westgate Street and the lanes and links off it. Known for its proximity to the landmark Cathedral (the finest example of</p>	<p>In response, to strengthen the introduction to Section D 'Historic Environment', the parties agree to the following proposed additional text in the introduction to Section D (PM034, Submission Document CD010a):</p> <p><i>High Street Heritage Action Zone – Cathedral Quarter</i></p>	<p>Matter agreed/resolved.</p>

	<p>Perpendicular Gothic architecture in the world), it is one of the four original Roman routes of passage and oldest commercial streets in the City.</p> <p>The 4 year initiative aims to help revive this struggling retail area of the city. Its Delivery Plan includes, for example, a series of projects to improve the public realm, shopfronts and support a sustainable use for the Fleece, 26 Westgate Street and the Folk Museum, all notable heritage assets.</p> <p>The HSHAZ will help transform the local area, and act as a catalyst for momentum and further investment in the city centre. As such Historic England considers that the HSHAZ is an important component of the Local Plan's positive strategy for the conservation of Gloucester historic environment and should therefore be included in the document in accordance with NPPF para 185.</p>	<p><i>3.4.9 The City Council has also been successful in achieving High Street Heritage Action Zone (HSHAZ) status for the Cathedral Quarter, located around Westgate Street. Westgate is one of the oldest and best-preserved areas of Gloucester and the main commercial route linking the cathedral to the rest of the city. One of four original Roman routes, Westgate links the spectacular medieval cathedral to the rest of the city. Its array of stunning historic buildings includes the 15th century timber-framed Fleece Inn and Antiques centre, both of which are on Historic England's Heritage at Risk register. Despite its strong historic character, proximity to the cathedral and good location, Westgate Street is underperforming. Westgate's retail environment has changed dramatically in recent years. It once had a strong mix of independent businesses whose owners embraced the street's historic buildings, but many have moved on and prospective new owners feel the properties are expensive to run and difficult to convert. The street scene is tired, with poor paving, inconsistent signage, and general clutter. Many retail units stand vacant. Locals perceive the area in a negative light and of the thousands of visitors to the cathedral, few are attracted into Westgate Street.</i></p> <p><i>3.4.10 The Heritage Action Zone will capitalise on Westgate's untapped potential and boost the number of people living, working and taking pride in the area. The award of up to £1.9m to Gloucester City Council will invest in Westgate Street's beautiful historic buildings, repairing buildings and historic shopfronts and converting vacant upper floors for new uses. There will be advice and support for businesses in historic properties, and the streetscape will be</i></p>	
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<p>Townscape Character Assessment: Gloucester June 2019</p>	<p>As part of the evidence base, Gloucester CC has prepared an impressive townscape character assessment, an invaluable tool to inform the delivery of the Local Plan principles and strategic policies particularly in relation to design, place, transport and heritage policy.</p> <p>However the Plan makes no reference to it; how and when it should be applied. Historic England considers it should be referred to explicitly.</p>	<p>To address this this point, the following additional supporting text is proposed (PM035, Submission Document CD010a):</p> <p><i>‘3.4.13 A Townscape Character Assessment (TCA) has been undertaken for every part of the City. The TCA identifies the morphology of Gloucester identifying form and origins, building types, past and present uses, trees and greenspaces, grain, density and plot coverage, and architectural qualities including periods, detailing and materials and colour palettes for each character area. The TCA can be used to</i></p>	<p>Matter agreed/resolved.</p>

		<i>inform an understanding of character and local distinctiveness.'</i>	
Gloucester Public Realm Strategy (2017)	<p>The Gloucester Public Realm Strategy (2017) is only referred to in the text at 3.6.12. We assume it has been issued to ensure good practice in the historic city and is therefore considered an important reference.</p> <p>Good practice, in accordance with national design guidance and Historic England's Streets for All (2018) https://historicengland.org.uk/images-books/publications/streets-for-all/ (practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations, including highways engineers, planners and urban and landscape designers) is vital to conserve and enhance the nations primary historic cathedral cities such as Gloucester, York and Canterbury.</p> <p>As part of the Plan's positive strategy for the historic environment, how might its Design, Heritage and Transport policy champion the Public Realm Strategy and ensure appropriate quality standards are achieved?</p> <p>What is its role in ensuring an attractive, vital and vibrant town centre characterised by its rich and delightful heritage cityscape?</p>	<p>To address this this point, the following additional supporting text is proposed (PM035, Submission Document CD010a):</p> <p><i>3.4.14 The Public Realm Strategy SPD provides further guidance relating to the high-quality design of streets, squares, parks, green spaces and other outdoor spaces required in the historic core of the City.'</i></p>	Matter agreed/resolved.
Article 4 Directions	Article 4 directions can increase the public protection of designated and non-designated heritage assets and their settings. We note at	In response, the parties agree the following proposed change:	Matter agreed/resolved

	<p>paragraph 6.2 that GCC has two. Might these be referred to in Section 4 of the Plan as a component part of the city's positive heritage strategy?</p>	<p>3.4.2 The historic environment, consisting of archaeological remains, historic buildings, townscapes and landscapes, including locally significant assets and their settings in addition to designated and statutorily protected features, will be valued, protected, preserved, enhanced and managed for its contribution to character, local distinctiveness and sustainability. <i>Gloucester City has fourteen designated conservation areas and twelve are located in and around the city centre with two areas subject to Article 4 directives. The appraisals and management documents form a focus for heritage-led regeneration and economic development by understanding the importance of Gloucester's historic environments and managing change were necessary.</i> New development should seek to safeguard, and where possible enhance, heritage assets and their settings. Development will be required to respect and respond positively to designated heritage assets and their settings, avoiding loss or harm to their significance. Proposals that involve securing a viable future use or improvement to an asset on the Heritage at Risk register will be supported.</p>	
<p>Policy D1: Historic environment</p>	<p>HE welcomes this carefully considered clear and succinct policy.</p> <p>After point 6, to reflect the emphasis in the NPPF (paras 193 on), it may be helpful to include the following reference:</p> <p><i>Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less</i></p>	<p>In response, the parties agree the following proposed change (PM036, Submission Document CD010a):</p> <p>At criterion 3: '3. The proposed use of the heritage asset is compatible with the preservation <i>sustaining or enhancing</i> of its significance; and'</p> <p>Following criterion 6:</p>	<p>The issue raised by HE in relation to criterion 3 is agreed/resolved.</p> <p>In relation to the suggestion of additional text following criterion 6, further discussions between the parties have led to agreement that the following text should replace the submitted proposed change to better reflect the NPPF (PM036, Submission Document CD010a):</p> <p>Following criterion 6:</p>

	<p>than substantial harm to its significance. Any harm will require clear and convincing justification.</p> <p>At point 3 the Policy refers to “preservation”. “Sustain” may be more appropriate? (NPPF glossary definition of Conservation).</p>	<p><i>‘Great weight will be applied to the conservation of designated heritage assets and any harm will require a clear and convincing justification.’</i></p>	<p><i>‘Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.’</i></p>
<p>Policy D2: Non-designated heritage assets <i>Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should: 1. Be of high quality and designed sympathetically to <u>preserve</u> the historic, architectural and archaeological interest. 2. Respect the surrounding landscape and its setting. 3. Seek to enhance the character of the non-designated heritage asset.</i></p>	<p>Perhaps the opportunity could be taken to rationalise text, and ensure greater consistency with national policy, potentially as follows</p> <p>Policy D2: Non-designated heritage assets Development affecting a non-designated heritage asset or its setting should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered.</p>	<p>In response, the parties agree to the following proposed changes (PM037 / PM038, Submission Document CD010a): ‘Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should:’</p>	<p>Further conversations between the parties have led to agreement that the following text should replace the submitted proposed change to better reflect the NPPF (PM036, Submission Document CD010a)</p> <p>Policy D2: Non-designated heritage assets</p> <p>Development affecting a non-designated heritage asset, or its setting should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered.</p>
<p>Paragraph 3.4.15 <i>Gloucester City Council does not have a formal</i></p>	<p>To ensure that locally important heritage assets are identified and therefore given appropriate weight, Historic England would</p>	<p>To address this this point, the following amendments to the supporting text is proposed (PM038, Submission Document CD010a):</p>	<p>Matter agreed/resolved.</p>

<p><i>local list of non-designated heritage assets, but the Council have developed criteria for the identification of undesignated heritage assets which may be suitable for inclusion on a future local list and this is available from the City Council website.</i></p>	<p>encourage the city council to include a commitment to the preparation of a local list, especially as criteria is in place. At present there is only an aspiration to prepare a local list and as a consequence there is no certainty it will be forthcoming, resulting in an associated risk inconsistent with an expectation that the Plan sets out a positive strategy for those assets at risk.</p>	<p>3.4.23 Gloucester City Council does not have a formal <i>is in the process of creating a</i> Local List of non-designated heritage assets, <i>using a criteria for the</i>, but <i>the Council have developed criteria for the</i> identification of undesignated heritage assets. which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance ‘Local Heritage Listing: Historic England Advice Note 7’, which is available to download from the Historic England website.</p> <p>3.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future <i>the</i> Local List.</p>	
<p>Policy D5: Views of the Cathedral and historic places of worship</p>	<p>GCC’s <i>Heights of Buildings</i> SPD emphasises the importance city’s townscape and skyline and as a result inappropriate the potentially appropriate locations for taller structures and the form they should take.</p> <p>Whilst views of the cathedral and historic places of worship (policy D5) are very important planning matters, a consideration of the impact on other significant heritage concerns should not be overlooked.</p> <p>Historic England has prepared specific advice consistent with national policy and guidance to support the preparation appropriate and robust tall building LP policy. This may be</p>	<p>The City Council considers the approach taken in the Pre-Submission GCP is appropriate.</p>	<p>Historic England note that GCC considers the policy focus on the threat of potential development on important views of the city’s ecclesiastic structures is vital especially where views of towers and spires add to the city’s distinct historic character. As the Plan’s Design and Heritage policies can also apply to ensure the setting of other buildings, places and spaces can be considered, Historic England does not wish to challenge the validity of Policy D5.</p>

	<p>helpful to ensure an appropriate policy and basis for the subservient SPD.</p> <p>https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/</p>		
Section 4 Proposed site allocations	<p>The GCP includes a significant number of allocations that will have a direct and indirect impact on the significance of national, known and unknown, designated and undesignated heritage assets.</p> <p>As decisions will be expected to be made in accordance with the development plan it will be vital for the city council to demonstrate that the quantum of development (numbers and floor area) in the proposed allocations are compatible with its design and heritage policies, and that national policy expectations can be met.</p> <p>We note that the City Council has prepared Historic Environment Assessments of the proposed site allocations to demonstrate they are in accordance with national policy for the historic environment.</p>	<p>In considering potential site allocations, the City Council has engaged the expertise of its conservation and heritage officers in understanding and assessing the implications of the historic environment on the suitability of site allocations and in identifying heritage constraints/opportunities as part of site allocations policies.</p> <p>A number of specific Historic Environment Assessments were prepared to SALA sites in 2017 (Submission Documents HIS007). Following on from this, heritage matters were considered as part of the Strategic Assessment of Land Availability process, via engagement with internal conversation and heritage officers (Submission Document HOU010).</p> <p>Policies SD8 of the Adopted JCS, and D1 and D2 of the GCP provide a comprehensive policy framework for considering the historic environment through the Development Management process.</p>	<p>HE note that the City Council has prepared Historic Environment Assessments of the proposed site allocations to demonstrate they are in accordance with national policy for the historic environment.</p> <p>Matter agreed/resolved.</p>