

## **Matter 2: Coverage and general approach**

### **Coverage and general approach**

**22. Is the vision of the GCP, and the key principles which have been identified relevant; justified; and consistent with the JCS and national policy?**

22.1 The Vision and Key Principles seek to deliver the JCS through the district plan and address any issues or opportunities specific to the city. The first element of the Vision is *'Between 2011 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.'* Other key elements, such as supporting the regeneration of the city, supporting the economy of Gloucestershire, safeguarding and enhancing the historic, cultural and natural environment, all align with the JCS and NPPF.

22.2 Section 2 'Planning for Gloucester' sets the context for the GCP and provides a portrait of the city, identifying the characteristics that justify and support the Vision, Key Principles and policies.

**23. Should policies which are identified as being 'strategic' sit within this GCP? Are all the policies within the GCP appropriately identified as strategic and non- strategic? In the case of policies identified as strategic, are they intended to supersede specific policies within the JCS? If so, which, and what would be the implications of this?**

23.1 It is important to note that the use of the terms 'strategic' and 'local', in the context of the adopted JCS and district plans, was determined before the update to the National Planning Policy Framework (NPPF) was published in 2019, which provides a new definition. The adopted JCS addresses strategic matters of a cross boundary nature, setting the overall strategy for the area, strategic-size allocations to meet a proportion of housing needs for Gloucester City and Cheltenham Borough on a cross-boundary basis (450+ dwellings), strategic employment land allocations for the JCS as a whole and high-level development management policies where there is a need for consistency in approach.

23.2 The NPPF (2019) update introduced the requirement for local authorities to make explicit which policies in a local plan are strategic. The NPPF sets out what matters the strategic policies should provide for, with paragraphs 20 and 21 providing as set out below:

*'20. Strategic policies should set out the overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- a) Housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) Infrastructure for transport, communications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) Community facilities (such as health, education and cultural infrastructure); and*
- d) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaptation.'*

- 23.3 Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
- 23.4 Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 23.5 Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies.)
- 23.6 Neighbourhood plans are to be in general conformity with strategic policies contained in development plans, and Planning Practice Guidance paragraph ID41-076-20190509 sets out guidance as to how a strategic policy is determined for this purpose and states as follows:

*‘Strategic policies will be different in each area. When reaching a view on whether a policy is a strategic policy the following are useful considerations:*

- *Whether the policy sets out an overarching direction or objective*
- *Whether the policy seeks to shape the broad characteristics of development*
- *The scale at which the policy is intended to operate*
- *Whether the policy sets a framework for decisions on how competing priorities should be balanced*
- *Whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the local plan or spatial development strategy*
- *In the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the local plan or spatial development strategy*
- *Whether the local plan or spatial development strategy identifies the policy as being strategic...’*

- 23.7 On the basis, to comply with the definition on the NPPF, the City Council considers that some of the policies within the GCP should be identified as strategic. It is important to confirm however that none of the policies in the GCP identified as strategic are intended to replace strategic policies in the JCS. Indeed, and to the contrary, they seek to develop strategic JCS policies at the local level, consistent with the JCS approach. The GCP is the ‘daughter document’ of the JCS and complies with the strategic policy framework in the JCS, with any strategic new policy direction being a matter for the JCS Review.
- 23.8 Section 6 of the GCP provides a schedule of policies for both the GCP and Adopted JCS where it is considered they meet the definition of a strategic policy. This includes, for example, all site allocations for development, affordable housing (which builds on JCS Policy

SD12), the Cordon Sanitaire around Netheridge Sewage Treatment Works and the Cotswolds Beechwoods Special Area of Conservation.

23.9 The GCP will not replace any policies within the JCS, but deliver them locally, for example through the allocation of the authority's urban capacity for development. The GCP does not supersede any policies in the Adopted JCS.

**24. The submitted GCP period runs to 2031. Therefore, assuming the GCP is adopted in 2021, the effective lifespan of the GCP will be a maximum of 10 years. Is it appropriate to include strategic policies within a GCP which has less than 15 years to run??**

24.1 Paragraph 22 of the NPPF states that 'Strategic policies should look ahead over a minimum of 15-year period from adoption', rather than they 'must'. The policies identified as strategic in the GCP are considered to meet the definition in the NPPF and PPG, but because of the relationship with the JCS and timing of the adoption of that plan, it is not possible for them to cover a full 15-year period from adoption.

**25. Should the GCP explicitly set out how each of its policies relate to those contained within the JCS?**

25.1 The City Council would be happy to provide further clarity in the GCP on this matter should be Inspector consider it necessary. This could form a matrix as an appendix to the plan or a standardised introduction to each of the sections.

**26. The Gloucestershire Waste Core Strategy (GWCS) adopted in 2012, and the Gloucestershire Minerals Local Plan 2018-2032 (GMLP) adopted in March 2020, form part of the wider development plan. As such, should policies reference matters covered by their policies?**

26.1 In response to comments made by Gloucestershire County Council as Minerals and Waste Authority, proposed changes have been submitted that improve the linkages between the GCP, Waste Local Plan and Minerals Local Plan, to be considered through the examination in public. These have been identified through Submission Document CD010a 'Schedule of Changes Pre-Submission Gloucester City Plan Addendum' and shown as part of the plan through Submission Document CD010b 'Appendix 1 – Tracked changes Pre-Submission Gloucester City Plan'. The proposed changes have been agreed between Gloucester City Council and Gloucestershire County Council as Minerals and Waste Authority in a Statement of Common Ground (SoCG3).

**27. Is it appropriate that substantial reference is made within the text, and policies of the GCP, to strategies and plans which are not statutory planning documents? How could this apparent issue be resolved? (For example, Policy C3 refers to the City Council's Open Space Strategy; Policy D4 refers to Shopfronts, Shutters and Signage Design Guidelines, Policy G1 states that the policies of the Gloucestershire Local Transport GCP will be used for development management matters; and SA10 refers to the City Council's Concept Statement).**

27.1 With regard to Policy C3 'Public open space, playing fields and sports facilities', the evidence base has been used to justify the content of the policy, with new provision to be provided in accordance with the strategies. This is because the strategies identify opportunities for improvements to open spaces and playing fields that will be considered at the time of the

planning application. This provides a flexible approach that can reflect changing circumstances, for example where improvements have already been implemented through alternative development sites or investment from National Governing Bodies and allows the approach to be responsive to future updates to the strategies. Further information is provided as part of the City Council's response to Question 48.

- 27.2 With regard to Policy D4 'Shopfronts, Shutters and Signs', it may be more appropriate to identify the SPD as a part of the supporting text (including any future iteration), as it would need to be updated in the future to realign with the GCP, once adopted.
- 27.3 With regard to Policy SA10 'Former Fleece Hotel and Longsmith Street Car Park', the policy references the need to 'refer to the City Council's Concept Statement on all matters to do with built heritage and archaeology'. This is because the former Fleece Hotel is one of the most historically sensitive buildings in the city and the Council wishes to ensure these are properly addressed. However, on the basis that the Concept Statement is an SPD, it may be more appropriate to refer to it in supporting text, or to bring the heritage constraints identified in the Concept Statement into the main policy.
- 28. Is it appropriate that criteria which appear to be akin to policy wording are included within the supporting text of the GCP, and that supporting text/ background information is contained within the site allocation policies? If not, how could this be resolved to ensure that there is no ambiguity about what is policy and what is not? (For example, paragraph 3.1.13 sets out criteria against which a development would be considered).**
- 28.1 Paragraph 3.1.13 refers to Policy A1 'Effective and efficient use of land and buildings' – please see response to Question 64 in relation to this matter.
- 28.2 On the wider point, the City Council has tried to ensure that requirements identified in policies are interpreted / clarified in the supporting text, where necessary. If it is considered that clarity would be more appropriate as part of the policy text, or versa, the Council would be happy to consider this.
- 29. Does the GCP have enough flexibility to adapt to rapid change (para 11 of the Framework)?**
- 29.1 Paragraph 11 (a) states, '*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that (a) plans should positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change.*'
- 29.2 The Adopted JCS and GCP, taken together, take a positive / enabling approach to delivering development within the Gloucester City administrative area, whilst seeking to balance employment needs and the natural and built environment.
- 30. I note that there is no policy reference shown on the key to the Policies Map. Are all the policies of the GCP which have a geographical application clearly and consistently shown on the Policies Map? Is it appropriate that the Policies Map references policies which are not contained within the GCP?**

- 30.1 Having reviews the Policies Map, the City Council can confirm that references to 'green/blue infrastructure' have not been included for practical reasons, in that they are outlined in the JCS Green Infrastructure Strategy. Please see response to Question 35, Matter 4 for further information.
- 30.2 With regard to Local Wildlife Sites, the vast majority are identified on the Policies Map as other co-designations, for example SSSI, County Parks and Open Space etc, but for clarity they should also be co-labelled as Local Wildlife Sites. For further clarity, an already identified SSSI needs to be co-labelled as a RIGS.
- 30.3 In terms of the appropriateness of including policies map references that are not contained in the GCP, the City Council did this to enable users to see the full extent of policies that have a geographical extent for both the GCP and Adopted JCS, given that the plans should be read together. Otherwise the user would need to look at two separate policies maps.
- 30.4 In response to a representation received to the GCP Pre-Submission consultation, a minor change has been proposed to correct the extent of site allocation SA06 'Former Prospect House, 67 – 69 London Road'. This is shown in Submission Document CD010a 'Schedule of Changes Pre-Submission Gloucester City Plan (reference PM082) CD010c 'Appendix 2 – Amended Gloucester City Plan Policies Map'.
- 30.5 To aid use of the Policies Map, the City Council is happy to include Adopted JCS and GCP policy references on the Key.
- 31. Chapter 7 sets out the policies of the 1983 Adopted Gloucester City Plan which will be superseded on adoption of the GCP. This includes all the retail policies. Given that the submission version of the GCP does not include any specific retail policies, will the Council rely on the policies of the JCS and national policy for development management decision making? If so, will it result in a policy void?**
- 31.1 Policy SD2 'Retail and City / Town Centres' of the Adopted JCS sets out a strategic level policy relating to these matters for the JCS authorities. For Gloucester City, it includes:
- Identification of a settlement hierarchy (Gloucester City Centre as a key urban area).
  - Identification of the City Centre boundary, primary shopping area and retail frontages and subsequent policy approaches.
  - Application of sequential test and impact test.
  - Key development principles for development in designated centres.
- 31.2 Criterion 7 of this policy confirms that retail and city/town centre matters will be subject to a review and this is progressing. A new JCS Retail Study will be published shortly.
- 31.3 In terms of a policy void, policy SD2 does not cover matters relating to district and local centres, which are being progressed through the JCS Review. The current position is that these matters are addressed through policies from the Local Plan 2002 (Second Stage Deposit), which reached an advanced stage and has been adopted by the Council for development control purposes. [Further information is available on the City Council's website.](#)